



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING

LIESL EICHLER CLARK  
DIRECTOR



February 8, 2022

UPS NEXT DAY DELIVERY

Ms. Tammy Daniels  
Executive Director  
Detroit Land Bank Authority  
500 Griswold Street, Suite 1200  
Detroit, Michigan 48226

Mr. Todd Demand  
Emergent Services, LLC  
2900 South Graham Road  
Saginaw, Michigan 48609

Ms. Lajuan Counts  
Director  
Detroit Demolition Department  
Public Safety Headquarters  
1301 3<sup>rd</sup> Avenue, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

SRN/ID: U821905727; Wayne County

Dear Ms. Daniels, Ms. Counts and Mr. Demand:

**VIOLATION NOTICE**

On February 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of 18883 Brinker, Detroit, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), Part 61, Subpart M (National Emission Standard for Asbestos), and Rule 942 of Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to my investigation, the Detroit Land Bank Authority owns the facility, the Detroit Demolition Department oversaw the abatement project and Emergent Services, LLC, performed the abatement work. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

Broken and crumbled asbestos containing cementitious siding on the ground around the facility. This inspection was performed post planned renovation activities and after the Post Abatement Verification (PAV) was performed by Intertek PSI. The owner and the owner's representative along with the contractor failed to contain the asbestos-containing waste material.

## VIOLATION NOTICE

Ms. Daniels, Ms. Counts and Mr. Demand

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Process Description	Section Violated	Comments
During the post planned renovation inspection, cementitious siding material was observed removed and left on the ground around the facility.	40 CFR §61.150(a)(1)(iii)  Consent Judgement No. 18-862-CE	Failed to seal all asbestos-containing waste material in a leak tight container.

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by March 1, 2022, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation, and the date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The *signed* written response from the *owner and operator* to this violation notice, may be submitted by mail and directed to my attention at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@Michigan.gov and WolfJ2@Michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation extended to me during our email communications. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Dr. April Wendling  
Mr. Jason Wolf, EGLE