



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

March 20, 2020

Mr. Keith Jones  
J. Keith Construction, LLC  
1010 Antietam  
Detroit, Michigan 48207

Ms. Tammy Daniels  
The Detroit Land Bank Authority  
500 Griswold, Suite 1200  
Detroit, Michigan 48226

Mr. Ron Crawford  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, Michigan 48226

SRN: U822001111, Wayne County  
U822001112, Wayne County  
U822001113, Wayne County

Dear Mr. Jones, Ms. Daniels and Mr. Crawford:

### **VIOLATION NOTICE**

On February 26, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the properties located at:

- 266 W. Nevada, Detroit SRN: U822001111
- 4723 Canton, Detroit SRN: U822001112
- 4729 Canton, Detroit SRN: U822001113

The purpose of the inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, the properties are owned by the Detroit Land Bank Authority and were demolished by J. Keith Construction, LLC. The NESHAP for Asbestos holds both owners and operators liable for violations.

During the inspections, AQD staff noted that a notice of intent to renovate/demolish was not submitted for the above residential properties prior to demolition. The notifications should have been submitted as soon as possible to the AQD prior to the demolition of the structures.

Mr. Keith Jones  
Ms. Tammy Daniels  
Mr. Ron Crawford  
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Process Description	Section Violated	Comments
Demolition of three residential structures deemed emergency demolitions by the City of Detroit.	40 CFR 61.145(b)(3) iii; AQD Consent Judgment No. 18-862	Failure to notify the AQD as early as possible before, but not later than, the following working day for an ordered demolition.

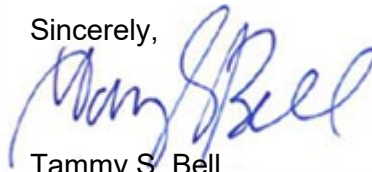
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by April 10, 2020 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Ms. Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [bellt4@michigan.gov](mailto:bellt4@michigan.gov) and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [wolfj2@michigan.gov](mailto:wolfj2@michigan.gov).

If the DLBA, the DBA and/or J. Keith Construction, Inc. believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during our inspection of 266 W. Nevada, 4723 and 4729 Canton Avenue, Detroit. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy S. Bell  
Senior Environmental Quality Analyst  
Air Quality Division  
313-330-0105

cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Dr. April Wendling, EGLE  
Mr. Jason Wolf, EGLE