



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 22, 2021

Ms. LaJuan Counts
Detroit Demolition Program
1301 Third Avenue, 6th floor
Detroit, MI 48226

Mr. Mark Green
Detroit Next, Inc.
1001 Woodward Ave, Suite 500
Detroit, MI 48226

Ms. Saskia Thompson
The Detroit Land Bank Authority
500 Griswold St. Suite 1200
Detroit, MI 48226

SRN: U822101997 and U822101998, Wayne County

Dear Ms. Counts, Ms. Thompson, and Mr. Green:

VIOLATION NOTICE

On August 31 and September 15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential structures located at 14202 and 14205 Indiana St., Detroit. The purpose of this 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 Detroit Land Bank Authority owns the properties, the Detroit Demolition Department manages the City of Detroit's demolition program and Detroit Next, Inc. performed the demolition activities at the subject properties. The NESHAP for Asbestos holds both the owner and operators liable for violations.

During the inspection on August 31, 2021, AQD staff observed the debris piles from the demolition of two residential properties across the street from each other. The structures had been demolished on August 24, 2021.

Ms. LaJuan Counts, Detroit Demolition Program
 Mr. Mark Green, Detroit Next, Inc.
 Ms. Saskia Thompson, The Detroit Land Bank Authority
 Page 2
 September 22, 2021

Process Description	Section Violated	Comments
Asbestos containing waste material generated from the demolition of structures from two residential properties. The structures were unsafe to fully survey or abate. Regulated asbestos containing material (plaster) was identified in at each location.	40 CFR 61.145(b)(2); Consent Judgement No. 18-862, Section 5.1	Failure to update notifications- the project end dates were listed as August 30, 2021, and the notifications indicated all asbestos was removed prior to demolition.
	40 CFR 61.150(a)(1)(i); Consent Judgement No. 18-862, Section 5.1	Failure to keep asbestos containing waste material adequately wet until disposal.
	40 CFR 61.150(b)(1); Consent Judgement No. 18-862, Section 5.1	Failure to deposit asbestos containing waste material as soon as practical.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 11, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence. Please include all waste disposal records for each location with the response.

Please submit the written response to Ms. Tammy Bell at EGLE, AQD 3058 West. Grand Blvd, Suite 2-300, Detroit, Michigan 48202 or 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.

If the City of Detroit, the Detroit Land Bank Authority and/or Detroit Next, 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.

Ms. LaJuan Counts, Detroit Demolition Program
Mr. Mark Green, Detroit Next, Inc.
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Page 3
September 22, 2021

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of 14202 and 14205 Indiana St., Detroit. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy Bell
Environmental Quality Specialist
Air Quality Division
313-330-0105

Enclosure: Sample results

cc: Mr. Hosam Hassanien, 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
Mr. Jason Wolf, EGLE
Dr. April Wendling, EGLE