



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 22, 2022

Mr. Jon Burtraw
City Abatement Services, LLC
10301 Joy Road
Detroit, MI 48204

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

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

SRN: U822105301, Wayne County

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

VIOLATION NOTICE

On February 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential structure located at 2294 Glendale, 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 owns the structure and City Abatement Services, LLC performed asbestos abatement activities at the structure. The Detroit Demolition Department manages the City of Detroit's Demolition Program. The NESHAP for Asbestos holds the owner and operators liable for violations.

On February 1, 2022, EGLE AQD staff conducted an inspection after asbestos abatement activities and the associated post abatement verification inspection which had cleared the structure for demolition .

During the inspection, EGLE AQD staff identified loose plaster as well as plaster still present on wood lath pieces that had been removed and placed in the backyard as part of the plaster abatement project. The post abatement verification inspection report noted that the inspector was unable to be verify that no plaster remained in the pile.

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Plaster was also noted on the sidewalk beneath the west window, and plaster was also observed remaining on a second-floor conduit inside of the structure. Samples were collected and the samples tested greater than 1% asbestos.

Process Description	Section Violated	Comments
Asbestos abatement activities conducted at 2294 Glendale, Detroit. The post abatement verification inspection was conducted on January 24, 2022.	40 CFR 61.145(c)(4)	Failure to contain RACM (asbestos plaster and associated lath) that had been abated from the structure in a leak tight container.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 15, 2022 (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 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 or City Abatement Services, LLC. 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 us during our inspection of 2294 Glendale, 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 Bell
Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Sample results

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Mr. Hosam N. Hassanien, City of Detroit BSEED
Ms. Crystal Rogers, 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