



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

August 14, 2023

LaJuan Counts
Detroit Demolition Department
1301 Third Avenue, 6th Floor
Detroit, MI 48226

SRN: U822302783, Wayne County

Dear LaJuan Counts:

VIOLATION NOTICE

On April 27, 2023, and August 2, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the former Ruddiman School located at 7310 Southfield Road, 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, Detroit Public Schools owns the former school. The Detroit Demolition Department oversaw the demolition of the facility. The Adamo Group, Inc. was contracted by the City of Detroit to perform demolition activities at the facility. The project scope of work was noted as an "emergency alteration", and did not include removal of subsurface structures.

An asbestos survey was not conducted prior to demolition by the Detroit Demolition Department, and as an ordered demolition, all building materials were presumed as asbestos at the time of demolition. In addition, it was noted that the school contained over 260 linear feet of pipe insulation and pipe fittings; intact and disturbed pipe insulation and pipe fittings were observed in the basement of the school. A review of additional documentation by EGLE shows that there were other regulated asbestos containing materials present in the school prior to its closure.

Due to the disturbance of regulated asbestos containing materials during the ordered demolition, the substructures are considered contaminated by asbestos and are considered an asbestos containing waste material. The asbestos-containing waste material is required to be wetted, removed from the site and disposed of at a landfill that accepts asbestos containing waste material.

Process Description	Section Violated	Comments
Ordered demolition of the former Ruddiman School located at 7310 Southfield, Detroit.	40 CFR 61.150(b)(1); Consent Judgment 18-862 Section 5.2.	Failure to deposit asbestos containing waste material as soon as practical-failure to remove asbestos-contaminated structures from the facility.

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by September 5, 2023. 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 recurrence. Please provide copies of waste shipment records upon completion of removal.

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

If the Detroit Demolition Department 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 the former Ruddiman School. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please me at the number listed below, or you may contact Jeremy Howe, Manager, Technical Programs Unit, at (231) 878-8681.

Sincerely,



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

Enclosures: Sample results, Demolition Decision Tree

LaJuan Counts, Detroit Demolition Department

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cc: Ron Crawford, Detroit Demolition Department
Mark Baron, City of Detroit BSEED
Crystal Rogers-Gilbert, City of Detroit BSEED
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jason Wolf, EGLE