



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 7, 2023

VIA E-MAIL

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

ID: U822303929; Wayne County

Dear LaJuan Counts:

VIOLATION NOTICE

On July 28, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of a commercial building located at 12155 Grand River Avenue, Detroit, Wayne County, Michigan.

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 our investigation, The Detroit Buildings, Safety Engineering and Environmental Department ordered the demolition and Detroit Construction and Demolition Department oversaw the contract, bidding and follow-thru of the demolition.

During the investigation, staff observed the following:

The subject structure located at 12155 Grand River Avenue was demolished. Upon my inspection of the site, I noticed that the concrete slab was still in place and had some demolition debris still on it, including suspect asbestos containing 9x9 floor tile and mastic. This structure was demolished by means of an Ordered Demolition that was given by Glenn Davis, Chief Building Inspector of Detroit Buildings, Safety Engineering and Environmental Department and there was no asbestos survey conducted. When a building is demolished in this manor, ALL debris, including the concrete slab and/or basement walls and floor, are to be considered asbestos containing waste material (ACWM) and must be treated, demolished and disposed of as such.

Process Description	Section Violated	Comments
Failure to deposit ACWM as soon as practical	40 CFR §61.150(b) AQD Consent Judgement No 18-862, Section 5.2	Failed to have the cement slab removed from a building that was demolished with no asbestos survey or abatement.
Failure to keep ACWM wet at all times.	40 CFR §61.150(a)(3) AQD Consent Judgement No 18-862, Section 5.2	Failed to have the cement slab kept wet at all times.

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Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by October 5, 2023 (which coincides with 28 calendar days from the date of this letter). The written response should include: the date(s) 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 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 Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and e-mailed to BrownJ9@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 violations cited above and for the cooperation extended to me during our conversation. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; e-mail at BrownJ9@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Jeremiah Brown
Senior Environmental Quality Analyst
Air Quality Division

cc: Ron Crawford, City of Detroit
Crystal Gilbert-Rogers, City of Detroit
Mark Baron, City of Detroit
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Dr. April Wendling, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE