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December 10, 2024

**VIA E-MAIL ONLY: [howej1@michigan.gov](mailto:howej1@michigan.gov)**

Jeremy Howe, Supervisor, Technical Programs Unit  
Air Quality Division  
Michigan Department of Environment, Great Lakes, and Energy  
P.O. Box 30260  
Lansing, Michigan 48909-7760

Re: SRN/ID: U822402215, Wayne County

Dear Mr. Howe:

This letter is in response to the Violation Notice, dated October 21, 2024, received by the City of Detroit's Construction and Demolition Department ("City") regarding the asbestos abatement work performed by National Environmental Group, LLC<sup>1</sup>("NEG") at a former school located at 13600 Ward Avenue, Detroit.

The Violation Notice alleges that on September 26, 2024, AQD staff conducted an inspection of the former school building and noted that additional asbestos removal occurred after the original notification had expired. The notification for asbestos abatement that occurred in September 2024, was only submitted to the MIOSHA asbestos program and did not include submittal to EGLE, AQD. According to the EGLE investigation, the amounts of regulated asbestos containing materials removed across the project had already exceeded the asbestos NESHAP threshold amounts of 160 square, 260 linear, and 35 cubic feet and required notification to EGLE, AQD. As a result, the Violation Notice alleges failure to notify EGLE ten (10) working days prior to additional removal of RACM that occurred in September 2024 pursuant to 40 CFR 61.145(b)(1) and Consent Judgment No. 18-862, Section 5.1b.

NEG conducted the abatement activities at the property as a subcontractor hired by the City's prime contractor for this project, Adamo Group Inc. ("Adamo"). As the contractor subject to the terms and conditions of a City contract, Adamo is responsible for the work of any subcontractor that performs or executes any portion of the demolition activities. As licensed contractors, it is the City's expectation that both Adamo and NEG would manage their respective activities in accordance with applicable laws, including the Asbestos NESHAP, and City's contract and policies. To the extent that a violation may have occurred, it would appear to be the result of the failure of the City's contractors to follow the requirements of the state and federal asbestos NESHAP, the City's Scope of Services – Abatement and Demolition of Blighted Residential Services, and the City's Contractor Discipline Policy.

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<sup>1</sup> The City of Detroit has a contract with Adamo Group Inc. National Environmental Group, LLC is a subcontractor for the City's contractor, Adamo Group Inc. and is not under contract with the City of Detroit.



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The City takes these allegations seriously and is committed to participating in their prompt resolution. Steps have been taken by the City to respond to the alleged violation and prevent its recurrence. As a result of the Violation Notice, the City issued a Health and Safety Violation Notice to the demolition contractor, Adamo, on November 15, 2024, under the Demolition Department Discipline Policy, Group III Offenses and the Demolition Department Program, Scope of Services for residential structures. Please see attached. This was done both to respond to the alleged violations and to prevent their recurrence. Furthermore, in order to prevent any recurrence of the alleged violation, the City will reemphasize the NESHAP requirements during weekly demolition contractor meetings.

It is our expectation that EGLE will acknowledge that the steps taken by the City demonstrate the necessary actions to address the alleged violation. The City appreciates the notification, as it assists the City to assess and address these alleged violations and allows the opportunity to take steps in order to prevent any future recurrence. Moreover, with the tremendous number of blighted structures being demolished within the City, all alleged violations are taken seriously to prevent any deficiencies that may impact the demolition program. We appreciate your assistance and look forward to continuing our relationship with EGLE to complete this important work. Please let us know if you have any further questions with respect to this matter.

Very truly yours,

*Timothy M Palazzolo*

Timothy Palazzolo, Director  
Detroit Construction and Demolition Department

cc: Mr. Jason Wolf, EGLE Enforcement Unit ([wolfj2@michigan.gov](mailto:wolfj2@michigan.gov))