



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

May 24, 2016

Ms. Pura S. Bascos
Detroit Land Bank Authority
500 Griswold Street
Suite 1100
Detroit, MI 48226

Mr. Jim Wright
Detroit Building Authority
500 Griswold Street
Suite 1200
Detroit, MI 48226

Mr. Timothy Drakeford
Direct Construction Services, LLC
5741 Roosevelt Street
Detroit, MI 48208

SRN: U821603097, Wayne County

Dear Mr. Drakeford and Wright and Ms.Bascos:

VIOLATION NOTICE

On April 20, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of two houses located at 19715 and 19695 Harned Street, Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, 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, Detroit Land Bank Authority owns the facility and the Detroit Building Authority/Direct Construction Services, LLC performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations .

During the inspection, staff observed the following:
The last date of work submitted on the Notification of Intent to Demolish was April 18, 2016. The demolition of the two houses occurred two days later – on April 20, 2016.

Process Description	Section Violated	Comments
Two houses in Detroit	40 CFR 61.145(b)(2)	Failure to update notice

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 14, 2016 (which coincides with 21 calendar days from the date of this letter). The written 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

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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.

If Direct Construction Services LLC, The Detroit Building Authority, or The Detroit Land Bank Authority believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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 me during my inspection of April 20, 2016. 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,



Joseph G. Goeddeke
Environmental Quality Analyst
Air Quality Division
517 332-7906

cc: Ms. LaReina Wheeler, City of Detroit BSEED
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ