



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

February 23, 2024

VIA E-MAIL

LaJuan Counts
Director
City of Detroit Construction and Demolition Department
1301 Third Avenue, 6th Floor
Detroit, Michigan 48226

SRN: U822302783; Wayne County

Dear LaJuan Counts:

VIOLATION NOTICE

On February 8, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the former Ruddiman School property 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 (40 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 Public Schools owns the facility. The City of Detroit Construction and Demolition Department oversaw the ordered demolition of the school. The Adamo Group, Inc. was contracted by the City of Detroit to demolish the school as an “emergency alteration.” The Adamo Group, Inc’s scope of work did not include removal of slabs/substructures at the time the building was demolished.

On August 14, 2023, a violation notice was issued to the Detroit Demolition Department for failing to remove asbestos containing waste material (ACWM) from the site. EGLE, AQD provided the City of Detroit additional time to respond to the August 14, 2023 violation notice in order to seek regulatory guidance from the United States Environmental Protection Agency (USEPA) regarding ordered demolitions. A letter was sent by the City of Detroit to the USEPA Region 5 on January 12, 2024, and is pending a return response.

On February 8, 2024, EGLE, AQD observed that the site had been backfilled. It is assumed that this was done without removal of ACWM as specifically proposed at a future date in the January 12, 2024 letter to the USEPA. Removal of the ACWM was requested in the violation notice and has been delayed while awaiting the response from the USEPA.

Process Description	Section Violated	Comments
Ordered demolition of the former Ruddiman School at 7310 Southfield, Detroit.	40 CFR 61.150(b)(1); Consent Judgment 18-862 Section 5.2	Failure to remove and deposit asbestos containing waste material at a Type II landfill prior to backfilling of the site.

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 8, 2024. 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 have your contractor submit a notice of intent to renovate/demolish prior to removal of ACWM and provide copies of waste shipment records upon completion of removal.

The signed written response to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, 525 West Allegan Street, Lansing, Michigan 48933 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@Michigan.gov.

If the City of Detroit Construction and 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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact Jeremy Howe, Supervisor, Technical Programs Unit, at 231-878-6687.

Sincerely,



Jeremy Howe
Supervisor, Technical Programs Unit
Air Quality Division
231-878-6687

cc: Ron Crawford, City of Detroit Construction and 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