



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREETHER  
DIRECTOR

December 18, 2018

Ms. Tammy Daniels  
The Detroit Land Bank Authority  
500 Griswold, Suite 1200  
Detroit, Michigan 48226

Mr. Tim Palazzolo  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, Michigan 48226

Mr. Todd Demand  
Decommissioning Services, LLC  
P.O. Box 614  
Williamston, Michigan 48895

SRN / ID: U821808198; Wayne County

Dear Ms. Daniels, Mr. Palazzolo and Mr. Demand:

### **VIOLATION NOTICE**

On December 11, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, performed an asbestos NESHAP (National Emission Standard for Hazardous Air Pollutants) planned renovation inspection at 7727 Auburn Street, Detroit, Wayne County. The planned renovation inspection was performed after the third party post asbestos verification inspection. 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 (Act 451).

According to our investigation, the Detroit Land Bank Authority and the Detroit Building Authority own the subject facility and Decommissioning Services, LLC, is the contractor who performed the planned renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for any violations.

During the inspection, staff observed the following:

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Planned renovation activities had taken place on the facility. However, asbestos containing material in the form of transite-style siding was observed on the ground around the exterior of the home, and Thermal System Insulation (TSI) was noted on a section of duct in the basement. Additionally, it was noted that the contractor was not on-site at the time of our inspection. The contractor's Notification of Intent to Renovate/Demolish had a project schedule end date of December 21, 2018.

<b>Process Description</b>	<b>Section Violated</b>	<b>Comments</b>
On 12/11/18, staff arrived on-site to perform a planned renovation inspection, which was performed post asbestos verification inspection. During the inspection staff observed RACM in the form of transite pieces on the ground around the foundation of the home and TSI on a duct in the basement of the home.	40 CFR 61.145 (b)(2)	Failure to update notice
	40 CFR 61.145 (c)(1)	Failure to remove all RACM
	40 CFR 61.145 (c)(4)	Failure to contain RACM in leak-tight container
	40 CFR 61.145 (c)(6)(i)	Failure to adequately wet
	AQD No. 15-2017	

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by January 9, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the signed written response to Mr. Craig Dechy at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or scan and email as an attachment to me at [Dechyc@michigan.gov](mailto:Dechyc@michigan.gov) and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [CamilleriJ@michigan.gov](mailto:CamilleriJ@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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to us during our phone conversations and site meeting. If you have any questions regarding the violation notification or the actions necessary to bring this facility into compliance, please feel free to contact me at 517-749-2891; [dechyc@michigan.gov](mailto:dechyc@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Dechy".

Craig Dechy  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Mina McLemore, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Tammy Bell, DEQ