



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 19, 2019

UPS NEXT DAY DELIVERY

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

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

SRN/ID: Various; Wayne County

Dear Ms. Daniels & Mr. Palazzolo:

VIOLATION NOTICE

On August 16, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the following PAV properties located in Detroit, Wayne County, Michigan:

- 12074 Indiana Street (U821905981);
- 12078 Cherrylawn Street (U821906058).

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 (Act 451) and the consent judgement #18-862.

According to our investigation, MWV Environmental Services was the general contractor for the abatement activities and the Detroit Land Bank Authority owns the properties. The Detroit Building Authority oversees the City of Detroit's demolition programs. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

The EGLE staff conducted an inspection of the sites and found Regulated Asbestos Containing Material (RACM) on air duct, Transite pieces (on the exterior of the home and garage) that were made RACM due to the removal methods and plaster. The subject structures were abated and had passed the PAV inspection.

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Process Description	Section Violated	Comments
Failure to remove RACM on air duct and plaster. Causing a Category I non-friable Transite siding to become friable (RACM) by means of removal methods.	40 CFR §61.145(c)(1) Consent Judgement #18-862	Failure to remove RACM.
Failure to thoroughly inspect.	40 CFR §61.145(a) Consent Judgement #18-862	Failure to thoroughly inspect.
Transite siding pieces on the ground around the exterior of the structure and dry.	40 CFR §61.145(c)(4) Consent Judgement #18-862	Failure to contain in leak tight container.
	40 CFR §61.145(c)(6)(i) Consent Judgement #18-862	Failure to wet RACM that has been stripped.
	40 CFR §61.150(a)(1)(ii) Consent Judgement #18-862	Visible emissions from handling operations.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 9, 2019 (which coincides with 21 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 Mr. Jason Wolf, Enforcement Unit at: EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed 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.

VIOLATION NOTICE

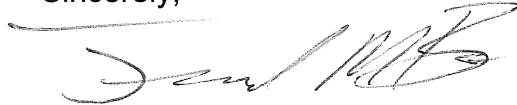
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Thank you for your attention to resolving the violations cited above and for the cooperation extended to me during our conversation. If you have any questions regarding the Violation Notice or the actions necessary to bring this facility into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeremiah Brown". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jason Wolf, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Jeffery Benya, EGLE