



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

November 16, 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

Ms. Dolly Saad
MRT Environmental, Inc.
27111 Powers Avenue
Dearborn Heights, Michigan 48125

SRN / ID: U821809208; Wayne County

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

VIOLATION NOTICE

On November 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) performed an asbestos inspection located at 4847 St. Hedwig Street, Detroit, Wayne County, Michigan. 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, MRT Environmental, Inc. was the operator who conducted the abatement activities, and Detroit Land Bank Authority and Detroit Building Authority are the property owners of the address mentioned above. The National Emission Standard for Asbestos holds the owner and operator liable for all violations.

During the investigation staff observed / discovered the following:

The subject property at 4847 St. Hedwig Street had asbestos abatement activities performed. While inspecting the basement, duct TSI (Thermal Systems Insulation), which is a regulated asbestos containing material (RACM), was found on one of the floor joists and was missed during the abatement and the PAV. This TSI was labeled 20C and was marked with spray paint from the original asbestos survey.

Process Description	Section Violated	Comments
RACM was left behind that was identified during the original asbestos survey	§61.145(c)(1)	Failure to remove RACM

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by December 7, 2018, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 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: DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at: DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to brownj9@michigan.gov and 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.

Thank you for your attention to resolving the violation 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,



Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

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