



GRETCHEN WHITMER
GOVERNOR

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

DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 26, 2019

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

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

SRN: U821902807, Wayne County

Dear Ms. Daniels and Mr. Palazzolo:

VIOLATION NOTICE

On April 18, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of an asbestos waste dumpster located at 18000 block of Cardoni Street, Detroit, MI that had regulated asbestos waste from the following addresses: 20122 Omira Street, 20065 Omira Street, 19265 Omira Street, 19242 Cardoni Street, and 19232 Cardoni Street.

The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M; 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; and Consent Judgment No. 18-862-CE.

According to our investigation, The Detroit Land Bank Authority owns the above facilities. The Detroit Building Authority oversees the City of Detroit's demolition programs. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

EGLE staff received a complaint regarding the dumpster located on the 18000 block of Cardoni Street. The dumpster was open and there were small bits of broken transite on the floor, as well as a barrel – covered with red tape and plastic – that was open to the elements. The transite in the barrel was not wet. Also, the barrels on the front of the dumpster did not have waste generator labels. During the inspection, staff observed the following air pollution violations:

Process Description	Section Violated	Comments
Dumpster located at 18000 block of Cardoni street, Detroit	40 CFR 61.150(a)(1)(iii), Consent Judgment No. 18-862-CE, Paragraph 5.1	Failure to seal while wet.

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	40 CFR 61.150(a)(1)(v), Consent Judgment No. 18- 862-CE, Paragraph 5.1	No generator labels.
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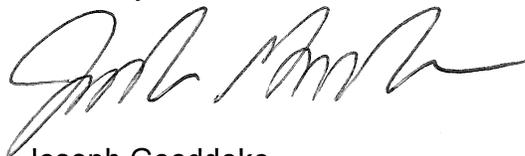
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by May 17, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the causes 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.

The owner must submit a signed written response to Joseph Goeddeke at EGLE, AQD, 3058 West Grand Boulevard, Detroit, Michigan 48202 or goeddekej@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If you believe 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 violations cited above and for the cooperation that was extended to me during our conversations. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517-331-7906

cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Karen Kajiya-Mills, EGLE
Mr. Jason Wolf, EGLE
Ms. Wilhemina McLemore, EGLE