



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYHER  
DIRECTOR

August 4, 2016

Mr. Kevin Woods  
BBEK Environmental, LLC  
24808 Thomas  
Warren, Michigan 48091

Mr. Tim Palazzolo  
Detroit Building Authority  
500 Griswold Street, Suite 1200  
Detroit, Michigan 48226

Ms. Pura Bascos  
Detroit Land Bank Authority  
500 Griswold Street, Suite 1100  
Detroit, Michigan 48226

Ms. Iva Patterson  
City of Detroit  
Office of Contracting & Procurement  
1301 Third Street, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

SRN: U821604523

Dear Ms. Bascos, Ms. Patterson, Mr. Palazzolo, and Mr. Woods:

### **VIOLATION NOTICE**

On August 2, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed an asbestos inspection at 3986 Humboldt Street, Detroit, Wayne County, Michigan. The purpose of these inspections 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.

According to our investigation, the Detroit Land Bank Authority owns the properties and BBK Environmental LLC performed the abatement activities at the sites. The City of Detroit, Office of Contracting and Procurement, is the contract holder for the demolition and abatement, and the Detroit Building Authority oversaw the City of Detroit's demolition program. The vacant residences were abated as part of a project to remove blight within the City of Detroit. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the investigation, DEQ AQD staff, Mr. Jeremiah Brown and Ms. Karen Kajiya-Mills observed the following:

The subject properties had been abated and regulated asbestos-containing material (RACM) was discovered at the property.

August 4, 2016

Process Description	Section Violated	Comments
Failure to remove RACM duct wrap at 3986 Humboldt.	§61.145(b)(4)(vi)	Failure to estimate the amount of Regulated Asbestos-Containing Material (RACM)
	§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 August 25, 2016, (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 both 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 or scanned and sent as an email attachment to brownj9@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 meeting and emails. 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 DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jeremiah Brown  
Environmental Quality Analyst  
Air Quality Division

- cc: Dr. Abdul El-Sayed, City of Detroit  
Mr. Butch Hollowell, City of Detroit  
Ms. LaReina Wheeler, City of Detroit, Dept. of Environmental Affairs  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Tom Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ