



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

August 5, 2016

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

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

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

SRN: U82608023 & U821608021, Wayne County

Dear Ms. Bascos and Messrs. Woods and Palazzolo:

**VIOLATION NOTICE**

On July 21, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of the asbestos NESHAP- subject residential properties located at 5753 and 6070 15<sup>th</sup> Street, Detroit. The purpose of this inspection was to determine BBEK Environmental, LLC's, the Detroit Land Bank Authority's and the Detroit Building Authority's 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, the Detroit Building Authority oversees the demolition activities including asbestos abatement and BBEK Environmental, LLC performed the asbestos abatement activities at the properties. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection at 5753 15<sup>th</sup> Street, AQD staff Joe Goeddeke observed dry, friable pipe insulation debris in the basement crawlspace. Transite siding and plaster tested positive at the site and had not been removed. At 6070 15<sup>th</sup> Street, dry, friable duct insulation and as well as stack cement were found in the basement, and dry debris in the window troughs.

Process Description	Section Violated	Comments
Asbestos abatement activities at 5753 and 6070 15 <sup>th</sup> Street, Detroit	§61.145(a)	Failure to thoroughly inspect for asbestos.
	§61.145(c)(1)	Failure to remove RACM.
	§61.145(c)(4)	Failure to contain in leak tight container
	§61.145(c)(6)(i)	Failure to wet RACM

Mr. Kevin Woods  
Ms. Pura Bascos  
Mr. Tim Palazzolo  
Page 2  
August 5, 2016

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 26, 2016 (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.

If BBEK Environmental, LLC, the Detroit Land Bank Authority and/or the Detroit Building Authority believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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 my inspection of 5753 and 6070 15th Street, Detroit. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

Enclosure: Sample results

cc: Ms. LaReina Wheeler, City of Detroit BSEED  
Mr. Melvin Butch Hollowell, City of Detroit  
Dr. Abdul El-Sayed, City of Detroit  
Mr. Leon Salenbien, Salenbien Trucking & Excavating  
cc via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Wilhemina McLemore, DEQ