



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

August 22, 2017

Mr. Tyrone Clifton, Director
Detroit Building Authority
1301 Third Street, Suite 328
Detroit, Michigan 48226

Ms. Irene Tucker
Detroit Land Bank Authority
500 Griswold Street, Suite 1200
Detroit, Michigan 48226

Mr. Kevin Woods
BBEK Environmental, LLC
24808 Thomas Street
Warren, Michigan 48901

SRN / ID: U821701969; Wayne County

Dear Mr. Clifton, Ms. Tucker and Mr. Woods:

VIOLATION NOTICE

On August 17, 2017, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) performed an asbestos inspection at 8444 Asbury Park, 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, the Detroit Land Bank owns the property and was under a contract for demolition through the City of Detroit and the Detroit Building Authority, which oversees demolitions for the City. BBEK Environmental, LLC submitted a 10-working day notification and conducted asbestos abatement at the site. The National Emission Standard for Asbestos holds the owner and operators equally liable for all violations.

During the investigation, DEQ AQD staff, Mr. Jeremiah Brown observed/discovered the following:

The subject property had undergone an asbestos abatement and was inspected by a subcontractor hired by the Detroit Building Authority. Our staff found RACM duct wrap on the cold air return in the basement that had not been abated. On the exterior, several small pieces of transite siding were found on the ground.

Process Description	Section Violated	Comments
Failure to thoroughly inspect and remove Regulated Asbestos-Containing Material (RACM)	§61.145(a)	Failure to thoroughly inspect
	§61.145(c)(1)	Failure to remove RACM

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by September 13, 2017, (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 both the owners and operators 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 violations cited above and for the cooperation extended to me during our meeting and emails. If you have any questions regarding this 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: Ms. LaReina Wheeler, City of Detroit, BSEED
Mr. Melvin Butch Hollowell, City of Detroit – Corporation Counsel
Mr. Timothy Palazzolo, Deputy Director, Detroit Building Authority
Mr. Ron Crawford, Detroit Building Authority
Mr. Brian Farkas, City of Detroit
Ms. Lynn Fiedler, MDEQ
Ms. Mary Ann Dolehanty, MDEQ
Mr. Christopher Ethridge, MDEQ
Ms. Wilhemina McLemore, MDEQ
Mr. Thomas Hess, MDEQ
Ms. Karen Kajiya-Mills, MDEQ
Ms. Tammy Bell, MDEQ