



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREYER
DIRECTOR

November 9, 2018

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

Mr. Kevin Woods
BBEK Environmental, LLC
27610 College Park Drive
Warren, MI 48088

SRN: U821807850, Wayne County

Dear Ms. Daniels and Messrs. Palazzolo and Woods:

VIOLATION NOTICE

On October 25, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the residential property located at 5929 St. Hedwig St., Detroit. The purpose of this inspection was to determine the Detroit Land Bank Authority's, the Detroit Building Authority's and BBEK Environmental, LLC's 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 and 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.

According to our investigation, the Detroit Land Bank Authority owns the facility and BBEK Environmental, LLC performed the asbestos abatement activities at the facility. The Detroit Building Authority manages the City of Detroit's Demolition Program. The NESHAP for Asbestos holds both the owner and operator(s) equally liable for violations.

On October 25, 2018, AQD staff Craig Dechy and Tammy Bell observed thermal system insulation in the basement crawlspace. The house had been cleared for demolition on October 17, 2018.

During the inspection, staff observed the following:

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| Process Description | Section Violated | Comments |
|--|--|------------------------|
| Asbestos NESHAP subject residential property scheduled for demolition. | 40 CFR 61.145(c)(1); Consent Order AQD No. 1-2017 | Failure to remove RACM |

Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by November 30, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Ms. Tammy Bell at DEQ, AQD, 3058 West Grand Boulevard, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or CamilleriJ@michigan.gov.

If the Detroit Land Bank Authority, the Detroit Building Authority and/or BBEK Environmental, LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to us during our inspection of 5929 St. Hedwig St., 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,



Tammy Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Sample results
cc: Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ