



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



LIESL EICHLER CLARK
DIRECTOR

March 27, 2019

Ms. Geraldine McDonagh
McDonagh Demolition
7243 West Touhy Avenue
Chicago, Illinois 60631

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

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

SRN/ID: Various, Wayne County

Dear Ms. McDonagh, Ms. Daniels and Mr. Palazzolo:

VIOLATION NOTICE

On March 6, 2019, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of the following residential properties located in Detroit, Wayne County, Michigan:

- 6126 Iroquois Avenue (U821900497)
- 6415 Iroquois Avenue (U821900371)
- 6432 Iroquois Avenue (U821900475)
- 6433 Iroquois Avenue (U821900485)

The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (CFR), 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, McDonagh Demolition was the operator who conducted the demolition activities at the properties and the Detroit Land Bank Authority owns the properties. The Detroit Building Authority oversees the City of Detroit's demolition programs. The National Emission Standard for Asbestos holds the *owner and operator* liable for all violations.

MDEQ AQD staff conducted an inspection of the site and noted dry plaster, transite, vermiculite, and other debris at the locations mentioned above. The asbestos surveys were limited in scope due to structural integrity issues. The asbestos that could be safely abated was done so and the houses were demolished as asbestos-containing. Because of this, all of the debris was disposed of as asbestos-containing and all debris must be removed from the site.

March 27, 2019

Process Description	Section Violated	Comments
Demolition of residential properties at 6126, 6415, 6432 & 6433 Iroquois Avenue	40 CFR §61.150(a)(3) Consent Order # 18-862	Failure to adequately wet the debris
	40 CFR §61.150(a)(1)(ii) Consent Order # 18-862	Visible emissions from handling operations
	40 CFR §61.150(b)(1) Consent Order # 18-862	Failure to deposit asbestos-containing waste material as soon as practical

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by April 17, 2019 (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 the *owner and operator* to this violation notice may be submitted by mail and directed to my attention at the address listed below. You must also include a copy to Mr. Jason Wolf, Enforcement Unit, AQD, at the same mailing address. The response may also be scanned and emailed to brownj9@michigan.gov and wolfj2@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 conversation. If you have any questions regarding this violation notice or the actions necessary to bring the facilities into compliance, please contact me at 517-599-7825; brownj9@michigan.gov; or at MDEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

cc: Mr. John Thieme, McDonagh Demolition
Ms. Mary Ann Dolehanty, MDEQ
Dr. Eduardo Olaguer, MDEQ
Mr. Christopher Ethridge, MDEQ
Ms. Wilhemina McLemore, MDEQ
Mr. Jason Wolf, MDEQ
Ms. Karen Kajiya-Mills, MDEQ
Ms. Tammy Bell, MDEQ