



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 26, 2019

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

SRN: U821900721, Wayne County

Dear Ms. Daniels and Mr. Palazzolo:

**VIOLATION NOTICE**

On April 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of a home located at 18412 Patton Street, Detroit, MI. The purpose of this inspection was to determine 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; 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; and Consent Judgment No. 18-862-CE.

According to our investigation, The Detroit Land Bank Authority owns the above facilities. The Detroit Building Authority oversees the City of Detroit's demolition programs.

Vinyl asbestos 9x9 floor tile on basement stairway treads in poor condition and asbestos insulation board on top of the furnace. Samples of each collected by staff were positive for asbestos. Both of these materials were left after the abatement, as well as after the Post-Abatement Verification inspection. During the inspection, staff observed the following air pollution violations:

| Process Description                          | Section Violated  | Comments  |
|--|---|---|
| Home located at 18412 Patton Street, Detroit | 40 CFR 61.145(c)(1),<br>Consent Judgment No. 18-862-CE, Paragraph 5.1 | Failure to remove regulated asbestos-containing material. |
|  | 40 CFR 61.145(a),<br>Consent Judgment No. 18-862-CE, Paragraph 5.1    | Failure to thoroughly inspect for asbestos.               |

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by May 17, 2019 (which coincides with 21 calendar days from the date of this letter). The 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.

The owner must submit a signed written response to Joseph Goeddeke at EGLE, AQD, 3058 West Grand Boulevard, Detroit, Michigan 48202 or goeddekej@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide 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 our conversations. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Mr. Paul Max, City of Detroit BSEED  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Mr. Jason Wolf, EGLE  
Ms. Wilhemina McLemore, EGLE