



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

June 3, 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: U821901920, Wayne County

Dear Ms. Daniels and Mr. Palazzolo:

**This letter supersedes the letter dated May 17, 2019, which incorrectly identified the property as 15972 Holmur, Detroit.**

**VIOLATION NOTICE**

On April 10 and 19, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential property located at 15792 Holmur, Detroit. 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 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 property and the Detroit Building Authority manages the demolition program for the City of Detroit. Go Green Contracting, Inc. performed the asbestos abatement activities at the facility. The NESHAP for Asbestos holds both the owner and operators liable for violations.

During the inspection, AQD staff observed that the house was cleared for demolition. However, the post abatement report failed to identify building materials that were not tested during the asbestos survey. Friable paper backing from the kitchen floor was identified and sampled by the AQD and tested positive for asbestos.

Process Description	Section Violated	Comments
Post abatement inspection at 15792 Holmur, Detroit.	40 CFR 61.145(c)(1), Consent Judgment No. 18-862-CE, Paragraph 5.1	Failure to remove RACM.

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	Consent Judgment No. 18-862-CE, Paragraph 5.6	Failure to identify findings of potential non-compliance with Part 61.145 (c) (1)
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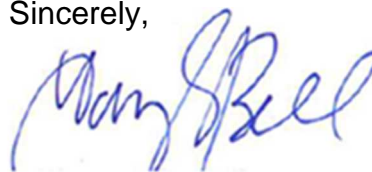
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by June 24, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes 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 EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or bellt4@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 the Detroit Land Bank Authority 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 factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during our inspection of 15792 Holmur, 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

Enclosures: Sample results & Notice to contractor

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