



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING

**EGLE**  
LIESL EICHLER CLARK  
DIRECTOR

September 16, 2021

UPS NEXT DAY DELIVERY

Ms. Saskia Thompson  
Executive Director  
Detroit Land Bank Authority 500  
Griswold Street, Suite 1200  
Detroit, Michigan 48226

Ms. Katrenia Williams  
Owner/President  
MWV Environmental Services, Inc.  
Detroit, Michigan 48228

Ms. Lajuan Counts  
Director  
Detroit Demolition Department  
Public Safety Headquarters  
1301 3<sup>rd</sup> Avenue, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

SRN/ID: U822104144; Wayne County

Dear Ms. Thompson, Ms. Counts and Ms. Williams:

**VIOLATION NOTICE**

On September 10, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of 19742 Burgess Street, Detroit, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 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 my investigation, the Detroit Land Bank Authority owns the facility, the Detroit Demolition Department oversaw the abatement project and MWV Environmental Services, Inc., performed the abatement work. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

Duct insulation was on registers throughout the main floor. Insulation on one of the duct registers was noted as being detached from the duct. The inspection was performed post planned renovation activities and after the PAV had taken place by Environmental Testing & Consulting. The owner and the owner's representative along with the contractor failed to remove all Regulated Asbestos Containing Material and Regulated Asbestos Containing Waste Material.

## VIOLATION NOTICE

Ms. Thompson, Ms. Counts and Ms. Williams

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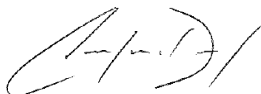
Process Description	Section Violated	Comments
During the post planned renovation inspection, TSI was observed on and off duct registers throughout the facility.	40 CFR §61.145(c)(1)	Failure to remove all RACM.
	40 CFR §61.145(c)(6)(i)	Failure to adequately wet the material and ensure that it remained wet until collected and contained.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by October 6, 2021, (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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and emailed to DechyC@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 email communications. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; DechyC@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy  
Environmental Quality Analyst  
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Dr. April Wendling  
Mr. Jason Wolf, EGLE