



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

February 25, 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

Mr. John Thieme
McDonagh Demolition Company
9940 Roselawn Street
Detroit, MI 48204

SRN: U821900254, Wayne County

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

VIOLATION NOTICE

On February 6, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the residential property located at 19795 Harlow, 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 residential building, and the Detroit Building Authority manages the City of Detroit's demolition program. McDonagh Demolition Company demolished the residence as part of the City of Detroit's blight removal program. The NESHAP for Asbestos holds the owner and operators liable for violations.

On February 6, 2019, McDonagh Demolition Company contacted the AQD to inform them that residence had been demolished without a post abatement verification inspection, and that cementitious siding found on the 2nd floor had not been removed prior to demolition.

Process Description	Section Violated	Comments
Demolition of an asbestos NESHAP subject residential property located at 19795 Harlow, Detroit.	40 CFR 61.145(c)(1); and Consent Judgment File No. 18-862-CE, Section V, Paragraph 5.1 (g).	Failure to remove cementitious asbestos siding prior to demolition of the structure.

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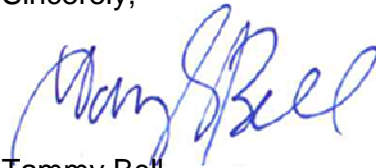
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 18, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the causes 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 DEQ, AQD 3058 West Grand Boulevard, Detroit, Michigan 48202 or bellt4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If the Detroit Land Bank Authority, the Detroit Building Authority, or McDonagh Demolition Company 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 my inspection of 19795 Harlow, 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
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jason Wolf, DEQ