



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 18, 2020

UPS NEXT DAY DELIVERY

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

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

ID: U821910850 & U821902095; Wayne County

Dear Ms. Daniels and Mr. Palazzolo:

VIOLATION NOTICE

On February 5, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at the following locations: 20430 Exeter Street and 1574 Highland Street, Detroit, Wayne County, Michigan.

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 our investigation, the initial asbestos surveys were conducted by PSI (20430 Exeter Street) and Mannik Smith (1574 Highland Street). Both contractors conducted the Post Abatement Verification (PAV) at the mentioned locations above. The Detroit Land Bank Authority owns the properties and The Detroit Building Authority oversees the City of Detroit's demolition programs. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the investigation staff observed the following:

The subject structures had an asbestos survey done to identify all asbestos containing items. The structures were abated by Men, Women and Veterans, and PAV inspections were conducted. During our inspection we found suspect RACM at 1574 Highland Street in the form of stack cement and TSI board. Our sample results confirmed both items to be asbestos containing over 1 percent. At 20430 Exeter Street our inspection found RACM in the form of TSI board located in the basement where a heat duct was located. On the exterior of the structure, several small pieces of cementitious asbestos siding were found after abatement. Our samples confirmed these two items to be positive for asbestos over 1 percent.

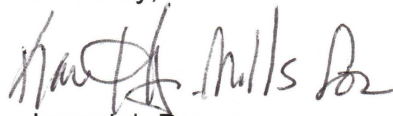
Process Description	Section Violated	Comments
Failure to thoroughly inspect the subject structure both in the original asbestos survey and during the PAV.	40 CFR §61.145(a)	Failure to thoroughly inspect.
	Consent Order #18-862 part 5.6(a)	Failure to thoroughly inspect and identify suspect RACM.

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by March 5, 2020, (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, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at: EGLE, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may 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 the violation notice or the actions necessary to bring these facilities into compliance, please contact me at 517-599-7825; BrownJ9@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Jeremiah Brown
Environmental Quality Analyst
Air Quality Division

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Jeff Korniski, EGLE
Ms. Karen Kajjya-Mills, EGLE
Mr. Jason Wolf, EGLE