



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

LANSING

March 20, 2020

NEXT DAY UPS DELIVERY

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

Mr. Ron Crawford  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, Michigan 48226

SRN/ID:U821910771; Wayne County  
SRN/ID:U821910783; Wayne County

Dear Ms. Daniels & Mr. Crawford:

**VIOLATION NOTICE**

On March 12, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted inspections at 16158 Lamphere Street and 16736 Dolphin Street, Detroit, Wayne County, Michigan. The purpose of these inspections 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, and the Consent Judgement No. 18-862-CE.

According to our investigation, The Detroit Land Bank Authority owns the property. 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.

The EGLE staff conducted inspections of the sites and found RACM (Regulated Asbestos Containing Material) in the first-floor wall cavities in the form of duct insulation on duct runs of both above mentioned addresses. Evidence of a thorough inspection was not present as these materials were not identified (located or quantified) on the asbestos survey and were not found during the abatement activities or PAV process. The subject structure was abated and had passed the PAV inspection.

Process Description	Section Violated	Comments
RACM was observed in wall cavities that had not been identified properly on the asbestos survey.	40 CFR §61.145(a) Consent Judgement No.18-862-CE Paragraph 5.1 (a)	Failure to thoroughly inspect for asbestos.

## VIOLATION NOTICE

Ms. Daniels & Mr. Crawford

Page 2

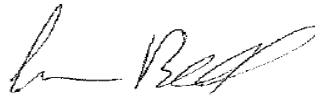
March 20, 2020

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by April 10, 2020, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 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 Belli@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 violation 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 this facility into compliance, please contact me at 517-582-0535; Belli@Michigan.gov; or the post office box address provided in the paragraph above.

Sincerely,



Ivan Bell  
Environmental Quality Analyst  
Air Quality Division

### Enclosures

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