



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 29, 2019

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

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

SRN: U821902747, Wayne County

Dear Ms. Daniels and Mr. Palazzolo:

VIOLATION NOTICE

On August 12, 2019, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of a commercial site located at 31 Woodland, 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 owns the property and the Detroit Building Authority manages the demolition program for the City of Detroit. Gayanga Demolition Company performed the demolition activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection and subsequent investigation, staff observed that the Notice of Intent to Demolish was not updated to show that regulated asbestos-containing material would remain in place during the demolition. It was also discovered that the required Ordered Demolition letter was not included with the notice. The AQD staff was also made aware of a video, posted on the City of Detroit's Facebook page, of the actual demolition of the building at 31 Woodland. The video showed several potential violations occurring, including visible emissions offsite and lack of signage on trucks taking the debris to a landfill. These violations were not included in this violation notice because they were not personally witnessed by the AQD staff.

Process Description	Section Violated	Comments
Ordered Demolition at 31 Woodland, Detroit	40 CFR 61.145(b)(2); Consent Judgment No. 18-862-CE, Paragraph 5.2	Failure to update notice
	40 CFR 61.145(b)(4)(xiv); Consent Judgment No. 18-862-CE, Paragraph 5.2	Failure to include ordered demolition letter in notice

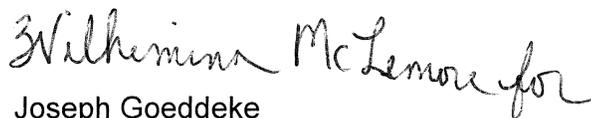
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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 dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Joseph Goeddeke at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or goeddekej@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 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 appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517-331-7906

- cc: Mr. Brian McKinney, Gayanga Company
- Mr. Paul Max, City of Detroit BSEED
- Ms. Mary Ann Dolehanty, EGLE
- Dr. Eduardo Olaguer, EGLE
- Mr. Christopher Ethridge, EGLE
- Ms. Jenine Camilleri, EGLE
- Ms. Karen Kajiya-Mills, EGLE
- Ms. Wilhemina McLemore, EGLE
- Mr. Jason Wolf, EGLE