



STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY

LANSING



GRETCHEN WHITMER
GOVERNOR

LIESL EICHLER CLARK
DIRECTOR

February 15, 2019

Mr. Sadier Abro
Abro One Property, LLC, and
Abro Three Property, LLC
9963 Gratiot Ave.
Detroit, MI 48213

Mr. Sadier Abro
3807 Beechcrest
Rochester Hills, MI 48309

Mr. Sherman Gipson
Gipson Brothers Trucking, Inc.
2918 Ewald Circle
Detroit, MI 48238

SRN: U821801450 and U821801451, Wayne County

Dear Mr. Abro and Mr. Gipson:

SECOND VIOLATION NOTICE

On December 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) performed an asbestos inspection at 10010 and 10020 Gratiot Ave., Detroit. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations, 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 (Act 451).

On January 24, 2019, the AQD sent Abro One Property, LLC, Abro Three Property, LLC, and Gipson Brothers Trucking (Companies) a Violation Notice (VN) citing violations discovered because of the inspection and requested the Companies' written response by February 14, 2019. A copy of this VN has been enclosed for your reference. As of the date of this letter, the AQD has not received the Companies' written response to the cited violation.

Please be advised that failure to respond in writing and identifying actions the Companies will take or has taken to resolve the cited violation may result in an escalated enforcement action by the AQD. Please provide the information requested in the VN dated January 24, 2019 by March 1, 2019, which corresponds to 14 days from the date of this letter.

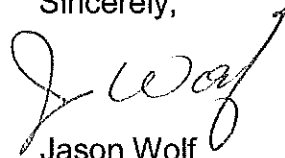
Mr. Sadier Abro
Mr. Sherman Gipson
Second Violation Notice
Page 2

The Companies' written response must be submitted to Tammy Bell at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, Michigan 48202, and must include a copy to Mr. Jason Wolf, Enforcement Unit at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. Or the response may be scanned and sent to bellt4@michigan.gov and wolfj2@michigan.gov.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding this matter or the actions necessary to bring the Company into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink that reads "J Wolf". The signature is stylized with a large, looped "J" and a long, sweeping "W".

Jason Wolf
Enforcement Unit
Air Quality Division
517-284-6772

Enclosure

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Tammy Bell, DEQ



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



LIESL EICHLER CLARK
DIRECTOR

January 24, 2018

Mr. Sadier Abro
Abro One Property, LLC, and
Abro Three Property, LLC
9963 Gratiot Ave.
Detroit, MI 48213

Mr. Sadier Abro
3807 Beechcrest
Rochester Hills, MI 48309

Mr. Sherman Gipson
Gipson Brothers Trucking, Inc.
2918 Ewald Circle
Detroit, MI 48238

SRN: U821801450 and U821801451, Wayne County

Dear Mr. Abro and Mr. Gipson:

VIOLATION NOTICE

On December 13, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of buildings located at 10010 and 10020 Gratiot Ave., Detroit. The purpose of this inspection was to determine Gipson Brothers Trucking, Inc.'s and Abro One Property, LLC's / Abro Three Property, LLC's 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, Abro One Property, LLC owns the property at 10010 Gratiot Ave., and Abro Three Property, LLC owns the property at 10020 Gratiot Ave. in Detroit. Gipson Brothers Trucking, Inc. performed the demolition activities at both properties. The NESHAP for Asbestos holds both the owner and operator of each building liable for violations.

During the inspection, AQD staff observed that demolition of the two adjacent buildings occurred outside of notified project dates. Floor tile was sampled during the inspection and tested positive for asbestos. Pieces of tile were found in a dry, friable state. Proof of asbestos abatement prior to demolition was requested from the owner and was not provided to the AQD.

Process Description	Section Violated	Comments
Demolition of buildings located at 10010 and 10020 Gratiot Ave., Detroit	40 CFR 61.145(b)(2)	Failure to update notice-the project was notified to start and end in April of 2018
	40 CFR 61.145(c)(1)	Failure to remove RACM prior to demolition.
	40 CFR 61.145(c)(4)	Failure to contain in leak tight containers.
	40 CFR 61.145(c)(6)(i)	Failure to wet RACM.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(c)	No signs during loading and unloading.
	40 CFR 61.150(c)	Failure to deposit at a Type II landfill.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by February 14, 2019 (which coincides with 21 calendar days from the date of this letter). The 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 Ms. Tammy Bell at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, 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 Gipson Brothers Trucking, Inc., or Abro One Property, LLC / Abro Three Property, LLC 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 violations cited above and for the cooperation that was extended to me during my inspection of 10010 and 10020 Gratiot Ave., Detroit. 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.

Mr. Sadier Abro
Mr. Sherman Gipson
Page 3
January 24, 2019

Sincerely,

A handwritten signature in black ink, appearing to read "Tammy Bell". The signature is fluid and cursive, with the first name "Tammy" written in a larger, more prominent script than the last name "Bell".

Tammy Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosures

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
Mr. Jason Wolf, DEQ
Ms. Wilhemina McLemore, DEQ