



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



LIESL CLARK  
DIRECTOR

April 15, 2019

Mr. Jon Burtraw  
City Abatement Services LLC  
10301 Joy Road  
Detroit, Michigan 48204

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

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

SRN / ID: Various, Wayne County

Dear Mr. Burtraw, Ms. Daniels & Mr. Palazzolo:

### VIOLATION NOTICE

On April 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of an asbestos waste dumpster located at 1133 Nevada Avenue in Detroit, Wayne County Michigan that had regulated waste from the following addresses:

- 18138 Cardoni U821903360
- 1133 Nevada Avenue U821903368
- 1141 Nevada Avenue U821902550

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 (Act 451).

According to our investigation, City Abatement Services LLC was the operator who conducted the abatement activities at the facility and the Detroit Land Bank Authority owns the facility. 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:

DEQ/AQD staff conducted an inspection of the dumpster and noted the debris bags and drums in the dumpster had no waste generator labels on them.

Mr. Burtraw, Ms. Daniels & Mr. Palazzolo  
April 15, 2019

Process Description	Section Violated	Comments
No waste generator labels on asbestos waste bags and drums.	40 CFR §61.150(a)(1)(v) Consent Order # 18-862	Failure to label waste with generator labels

Please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by May 5, 2019, (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: DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Mr. Jason Wolf, Enforcement Unit at: DEQ, AQD, 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 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 517-599-7825; 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, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jason Wolf, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Tammy Bell, DEQ