



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

October 2, 2018

Ms. Tammy Sulkowski  
R.T.R. Services Corp.  
7033 Morrish Road  
Swartz Creek, MI 48473

Mr. Mathew J. Farrell  
M1 Bunker LLC  
691 N. Squirrel Road, Suite 120  
Auburn Hills, MI 48326-2869

Mr. Mathew J. Farrell  
8722 South Shore Drive  
Clarkston, MI 48348

SRN: U631808141, Oakland County

Dear Ms. Sulkowski and Mr. Farrell:

**VIOLATION NOTICE**

On September 19, 20 and 24th, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the former Salvation Army located at 108 and 118 W. Lawrence, Pontiac. The purpose of this inspection was to determine M1 Bunker LLC's and R.T.R. Services Corp.'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, M1 Bunker LLC owns the facility and R.T.R. Services Corp. performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, DEQ staff Tammy Bell and Joseph Goeddeke observed that regulated asbestos-containing materials including, but not limited to, thermal system insulation and 9" x 9" floor tile had been disturbed at the facility.

Process Description	Section Violated	Comments
Renovation activities at 108 and 118 W. Lawrence, Pontiac.	40 CFR 61.145(a)	Failure to thoroughly inspect the facility for the presence of asbestos, including Category I and Category II nonfriable ACM.

	40 CFR 61.145(b)(3)(i)	Failure to provide notification at least 10 working days before asbestos removal work or any other activity begins that would break up, dislodge or similarly disturb asbestos material.
	40 CFR 61.145(c)(1)	Failure to remove RACM from a facility before any activity begins that would break up, dislodge, or similarly disturb the material.
	40 CFR 61.145(c)(3)	Failure to adequately wet RACM during stripping.
	40 CFR 61.145(c)(4)	Failure to contain RACM in leak tight containers.
	40 CFR 61.145(c)(6)(i)	Failure to adequately wet RACM that has been stripped.
	40 CFR 61.145(c)(8)	Failure to have an on-site representative trained in the provisions of 40 CFR Part 61, Subpart M and the means of complying with them present at the facility.
	40 CFR 61.150(a)(1)	Failure to adequately wet asbestos waste containing material (ACWM).
	40 CFR 61.150(a)(1)(3)	Failure to seal ACWM in leak tight containers or wrapping.
	40 CFR 61.150(a)(1)(3)(v)	Failure to label containers with the name of the waste generator and the location at which the waste was generated.
	40 CFR 61.150(b)(1)	Failure to deposit ACWM at a waste disposal site operated in accordance with the provisions of § 61.154.
	40 CFR 61.150(c)	Failure to mark vehicles during the loading and unloading of waste so that the signs are visible.

Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 23, 2018 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the

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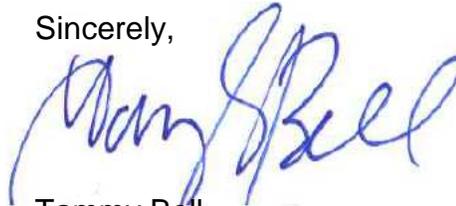
violations occurred; an explanation of the causes and duration of the violations, and whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Both parties please submit a written response to Ms. Tammy Bell at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or [bellt4@michigan.gov](mailto:bellt4@michigan.gov) and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or [CamilleriJ@michigan.gov](mailto:CamilleriJ@michigan.gov).

If M1 Bunker LLC and/or R.T.R. Services Corp. 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 us during the inspections of 108 and 118 W. Lawrence, Pontiac. 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,



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

Enclosure: Sample results and fact sheet

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Karen Kajiya-Mills, DEQ  
Ms. Joyce Zhu, DEQ