



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

November 8, 2017

Mr. Karl H. Thomas
HRT Enterprises
3075 SE St. Lucie Blvd
Stuart, FL 34997

Mr. Robert Pasek
GRS Corporation
1197 Rochester Rd, Suite C
Troy, MI 48083

Mr. Peter Adamo
36641 Moravian Drive
Clinton Township, MI 48035

SRN: U82130124, Wayne County

Dear Messrs. Thomas, Pasek and Adamo:

VIOLATION NOTICE

On October 26, 2017, the Department of Environmental Quality (DEQ), Air Quality Division, conducted a review of the waste manifests for demolition debris clean-up activities at the former industrial facility located at 11111 French Road, Detroit. The purpose of this inspection was to determine HRT Enterprises, GRS Corporation and Mr. Peter Adamo's 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.

According to our investigation, HRT Enterprises owns the facility and GRS Corporation and Mr. Peter Adamo performed the renovation activities at the facility. The National Emission Standard for Asbestos holds both the owner and operators liable for violations.

During the inspection, staff observed that the debris was manifested as non-friable asbestos. According to the landfill, in general, material manifested as non-friable asbestos is treated as either construction and demolition debris or municipal solid waste that is disposed of in the landfill.

Process Description	Section Violated	Comments
Removal /disposal of demolition debris	40 CFR 61.150(b)	Asbestos-containing waste material identified as non-friable

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containing regulated asbestos containing materials.		asbestos was not deposited in the landfill in accordance with the provisions of §61.154.
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 29, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If HRT Enterprises, GRS Corporation and/or Mr. Peter Adamo 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 violation cited above and for the cooperation that was extended to me during my inspection of 11111 French Road, Detroit. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ