



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

October 6, 2023

VIA E-MAIL

David Gillespie
Detroit Environmental Solutions, LLC
14215 West McNichols Road
Detroit, Michigan 48235

ID: U502306206; Macomb County

Dear David Gillespie:

VIOLATION NOTICE

On September 11, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted a complaint inspection at the commercial property located at 33360 Groesbeck Highway, Fraser. 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, 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, Detroit Environmental Solutions, LLC owns the facility where asbestos waste was being stored, and performed the abatement activities that generated the waste. During the inspection, it was determined that the waste was generated as a result of the removal of regulated asbestos containing materials (RACM). A list of the originating properties (provided by DES) is attached. The NESHAP for Asbestos holds operators liable for violations.

During the inspection, AQD staff observed the following: Large amounts of improperly stored asbestos containing waste (ACWM) in the warehouse and select vehicles of a licensed asbestos abatement contractor. Approximately 40 cubic yards of ACWM was present at the time of inspection. A majority of the waste containers were not properly labeled (no generator labels and/or asbestos labeling) and many containers were ripped, punctured or otherwise improperly sealed. Waste within inspected containers was dry. Suspect ACWM was observed free, loose and dry on the ground within the storage areas and vehicles. Sampling conducted by EGLE, AQD staff confirmed asbestos containing material within the waste.

Process Description	Section Violated	Comments
Complaint inspection conducted by the AQD due to concerns regarding asbestos containing waste material at the site.	40 CFR 61.145(c)(4)	Failure to contain ACWM in leak tight containers.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(a)(1)(i)	Failure to adequately wet ACWM.

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by October 27, 2023 (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 Jeremy Howe, TPU Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760; or scanned and e-mailed to HoweJ1@Michigan.gov. Questions regarding this violation notice may be directed to Jeff Benya, EGLE, AQD at BenyaJ@Michigan.gov.

If Detroit Environmental Solutions, 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 the listed property. 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,



Senior Environmental Quality Analyst
Air Quality Division
313-618-0372

Enclosures: Bulk Sample Results and Property Inventory

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Joyce Zhu, EGLE
Jeremy Howe, EGLE
Jenine Camilleri, EGLE
Jason Wolf, EGLE