



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

October 2, 2018

Mr. Brian Fritz
GFL Environmental USA, Inc
6200 Elmridge Drive,
Sterling Heights, MI 48313

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

SRN: U631808141, Oakland County

Dear Messrs. Fritz and Farrell, Ms. Sulkowski:

VIOLATION NOTICE

On September 19 and 20, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, 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 RTR 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, GFL Environmental USA Inc is the waste contractor, M1 Bunker LLC owns the facility and RTR Services Corp. performed the renovation activities at the facility. The NESHAP for Asbestos holds both the owner and operators equally liable for violations.

During the inspection, DEQ staff Joseph Goeddeke observed Thermal System Insulation (TSI) in two GFL roll-off bins on September 19, 2018. Lab results for a sample collected at that time proved it was regulated asbestos containing material (RACM). On the morning of September 20, 2018, a GFL driver that was removing one of the bins was informed that there was suspected asbestos containing waste material (ACWM) in the dumpster. However, the driver drove off and deposited the ACWM at the Oakland Heights landfill as regular construction and demolition debris. Lab results for TSI collected from the dumpster tested positive for asbestos.

Messrs. Brian Fritz and Mathew Farrell
Ms. Tammy Sulkowski
Page 2
October 2, 2018

Process Description	Section Violated	Comments
Renovation activities at 108/118 W. Lawrence, Pontiac	40 CFR 61.145(c)(4)	Failure to contain in leak tight container.
	40 CFR 61.150(a)(1)(iii)	Failure to seal while wet.
	40 CFR 61.150(a)(1)(v)	No generator labels.
	40 CFR 61.150(b)(1)	Failure to deposit asbestos containing waste material as RACM

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 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 Mr. Joseph Goeddeke at DEQ, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 or goeddekej@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.

If GFL Environmental USA Inc., M1 Bunker LLC 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 violation cited above. 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,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
(517) 331-7906

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