



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 8, 2019

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

SRN: U821909255 and U821907491, Wayne County

Dear Mr. Burtraw:

VIOLATION NOTICE

On September 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential properties located at 15356 Sorrento and 15733 Lahser, Detroit. The purpose of this inspection was to determine 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, City Abatement Services, LLC performed asbestos abatement activities at the two properties as part of the City of Detroit's blight program. The NESHAP for Asbestos holds both the owners and operators liable for violations.

During the inspections, it was noted that the post abatement verifications for each property showed the buildings had been cleared for demolition. However, at 15356 Sorrento, AQD identified pipe insulation in the kitchen. Floor tile (debris and missed tile) was found in the basement.

During the inspection of 15733 Lahser, regulated asbestos containing materials (RACM) including duct insulation and penetration mud were identified inside of the home. Debris from the cementitious siding we also found outside of the building.

| Process Description | Section Violated | Comments |
|---|---------------------|------------------------|
| Asbestos abatement activities at two residential properties being demolished for the City of Detroit. | 40 CFR 61.145(c)(1) | Failure to remove RACM |

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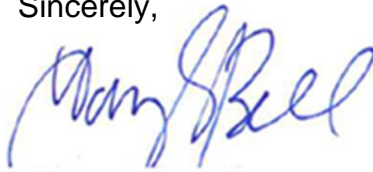
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by October 29, 2019 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the 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.

Please submit the written response to Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan or bellt4@michigan.gov and submit a copy to Mr. Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 or wolfj2@michigan.gov.

If City Abatement Services, 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 violation cited above and for the cooperation that was extended to me during my inspection of the above properties. 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 Bell
Senior Environmental Quality Analyst
Air Quality Division
313-330-0105

Enclosure: Sample results
cc: Mr. Ron Crawford, Detroit Building Authority
Mr. Paul Max, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Karen Kajiya-Mills, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jason Wolf, EGLE