



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

November 12, 2021

Mr. Robert Delicata
RDC Construction Services, LLC
200 Congress St.
Detroit, MI 48202

Ms. LaJuan Counts
Detroit Demolition Program
1301 Third Avenue, 6th floor.
Detroit, MI 48226

Ms. Saskia Thompson
The Detroit Land Bank Authority
500 Griswold St. Suite 1200
Detroit, MI 48226

SRN: U822101245, Wayne County

Dear Ms. Counts, Ms. Thompson, and Mr. Delicata:

VIOLATION NOTICE

On October 14 and October 22, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of residential properties located at 5891 Begole, 6008 Hazlett, 5955 and 5956 Northfield, Detroit. The purpose of the inspections was to determine RDC Construction Services, LLC's, the Detroit Demolition Department's, and the Detroit Land Bank Authority'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, the Detroit Land Bank Authority owns the properties and RDC Construction Services, LLC is contracted to perform demolition activities at the facility. The Detroit Demolition Department manages the City of Detroit's Demolition program. The NESHAP for Asbestos holds the owner and operators liable for violations.

On October 14 and 22, 2021, AQD staff observed that following violations:

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Process Description	Section Violated	Comments
Demolition of 6008 Hazlett, 5955 and 5956 Northfield, and 5891 Begole, Detroit.	40 CFR 61.145(b)(3)(iv)(A)(2) Consent Judgement No. 18-862, Section 5.1	Failure to provide the AQD with notice of new demolition start dates as soon as possible before, and no later than, the original start date.

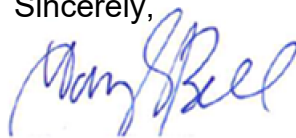
Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by December 3, 2021 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violations occurred; an explanation of the 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 Tammy Bell at EGLE, AQD 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 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 RDC Construction, LLC, the City of Detroit Demolition Department, and/or the Detroit Land Bank Authority 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 residential properties. 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
Environmental Quality Specialist
Air Quality Division
313-330-0105

Ms. Counts, Ms. Thompson, and Mr. Delicata

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cc: Mr. Hosam N. Hassanien, City of Detroit BSEED

Ms. Mary Ann Dolehanty, EGLE

Dr. Eduardo Olaguer, EGLE

Ms. Jenine Camilleri, EGLE

Mr. Christopher Ethridge, EGLE

Ms. Karen Kajiya-Mills, EGLE

Mr. Jason Wolf, EGLE

Dr. April Wendling, EGLE