



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

March 22, 2016

Mr. Robert Delicata
RDC Construction Services, LLC
26400 W 8 Mile Rd
Southfield MI 48033-5980

Mr. James Wright
Detroit Building Authority
1301 3rd Street
Detroit, MI 48226

Mr. Iva Patterson
City of Detroit
Office of Contracting and Procurement
2 Woodward Avenue #1008
Detroit, MI 48226

SRNs: U821602369, Wayne County

Dear Messrs. Delicata, Wright and Patterson:

VIOLATION NOTICE

On March 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an investigation of the asbestos-NESHAP subject properties located at 3232 Glynn Court and 6935 Edward, Detroit. The purpose of this investigation was to determine RDC Construction Services, LLC's, the Detroit Building Authority's and the City of Detroit Office of Contracting and Procurement'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, RDC Construction Services, LLC performed the demolition activities at the asbestos-NESHAP subject properties, the City of Detroit Office of Contracting and Procurement was the contract holder for the demolition, and the Detroit Building Authority oversaw the demolition. The National Emission Standard for Asbestos holds the owner and operators equally liable for violations.

On March 15, 2016, it was discovered that both properties had been demolished without the submittal of the required 10 day notification to the DEQ AQD .

Process Description	Section Violated	Comments
Demolition of two asbestos-NESHAP subject residential properties.	§61.145(b)(1)	Failure to provide 10 working day notification prior to demolition.

Messrs. Delicata, Wright and Patterson

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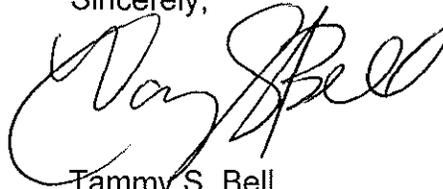
March 22, 2016

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 12, 2016 (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 violations are 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 RDC Construction Services, LLC, the Detroit Building Authority, and/or City of Detroit Office of Contracting and Procurement believe 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 investigation of the sites. 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

Enclosures

cc: Ms. LaReina Wheeler, City of Detroit BSEED

cc via email: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Ms. Holly Hollenbach, DEQ

Mr. Thomas Hess, DEQ

Ms. Karen Kajiya-Mills, DEQ

Ms. Wilhemina McLemore, DEQ