



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 5, 2020

Mr. Ron Crawford  
The Detroit Building Authority  
1301 Third Street, Suite 328  
Detroit, MI 48226

Ms. Tammy Daniels  
The Detroit Land Bank Authority  
500 Griswold, Suite 1200  
Detroit, MI 48226

SRN: U822000662 and U822000664, Wayne County

Dear Ms. Daniels and Mr. Crawford:

**VIOLATION NOTICE**

On February 12 and 13, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the residential properties located at 11701 Maiden and 960 E. Margaret, Detroit. The purpose of this inspection was to determine RDC Construction Services, LLC'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 properties are owned by the Detroit Land Bank Authority and were demolished for the City of Detroit. RDC Construction Services, LLC performed demolition activities at the two properties. The NESHAP for Asbestos holds both the owner and operator liable for violations.

An inspection was conducted of the above properties. The houses had been demolished. However, it was noted that RDC Construction Services, LLC did not submit a notice of intent to demolish to the AQD until February 17, 2020.

Process Description	Section Violated	Comments
Demolition of 960 E. Margaret and 11701 Maiden, Detroit.	40 CFR 61.145(a)(3); AQD Consent Judgment AQD No. 18-862-CE	Failure to notify the administrator as early as possible before, but not later than, the following working day for an ordered demolition.

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by March 26, 2020 (which coincides with 21 calendar days from the date of this letter). The response should include:

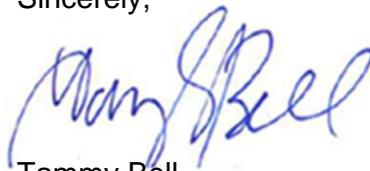
- the dates the violation occurred;
- an explanation of the causes and duration of the violation;
- whether the violation is ongoing;
- a summary of the actions that have been taken and are proposed to be taken to correct the violation;
- the dates by which these actions will take place; and
- what steps 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 the Detroit Land Bank Authority or the Detroit Building 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 violation cited above and for the cooperation that was extended to me during my inspection of 11701 Maiden and 960 E. Margaret, Detroit. 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

cc: Mr. Paul Max, City of Detroit BSEED  
Mr. Boysie Jackson, City of Detroit  
Mr. Robert Delicata, RDC Construction  
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  
Ms. April Wendling, EGLE