



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

March 22, 2016

Ms. Carrie Lewand-Monroe
Detroit Land Bank Authority
65 Cadillac Place, Suite 3200
Detroit, MI 48226

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

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

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

SRN: U821507057, Wayne County

Dear Ms. Lewand-Monroe and Messrs. Delicata, Wright and Patterson:

VIOLATION NOTICE

On February 26, 2016 and March 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an investigation of the residential properties located at 5816-18 Beechwood, 14558 Griggs, and 15736 West Parkway, Detroit. The purpose of this investigation was to determine the Detroit Land Bank Authority's, 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 properties are owned by the Detroit Land Bank, 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.

RDC Construction Services, LLC was requested to provide documentation pertaining to the demolition on 5816-18 Beechwood on February 26, 2016. During the review it was noted that the house had been demolished several weeks prior to the notification start date of October 29, 2015. On March 15, 2016, it was discovered that several homes had been demolished without the submittal of a 10 day notification to the DEQ AQD .

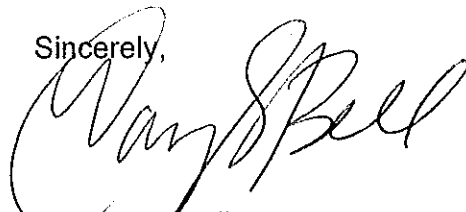
| Process Description | Section Violated | Comments |
|---|------------------|--|
| Demolition of asbestos-NESHAP subject residential properties. | §61.145(b)(1) | Failure to provide 10 working day notification for: 14558 Griggs, and 15736 West Parkway, Detroit |
| | §61.145(b)(3) | Failure to notify at least 10 working days prior to demolition-the notification for 5816-18 Beechwood was submitted after the house had been demolished. |

Please initiate actions necessary to correct the cited violations 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 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 recurrence.

If the Detroit Land Bank, 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 violations cited above and for the cooperation that was extended to me during my investigation of the sites. 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 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