



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 5, 2020

Mr. Robert Delicata
RDC Construction Services, LLC
26400 W. Eight Mile Road
Southfield, MI 48033

SRN: U822000662 and U822000664, Wayne County

Dear Mr. Delicata:

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 demolitions had been completed. 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.

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:

Mr. Robert Delicata

Page 2

March 5, 2020

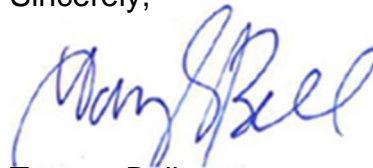
- a copy of the waste shipment records for the properties;
- a copy of the site foreman's asbestos NESHAP training;
- the dates the violation occurred;
- an explanation of the causes and duration of the violation;
- whether the violation is ongoing;
- a summary of the actions that have been taken and 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 RDC Construction 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 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. Ron Crawford, DBA
Mr. Boysie Jackson, City of Detroit
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