



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

May 8, 2018

Mr. Douglas Reginald
3003 Virginia Park
Detroit, MI 48206

Mr. Timothy Drakeford
Direct Construction Services, LLC
5741 Roosevelt
Detroit, MI 48208

SRN: U821709363, Wayne County

Dear Mr. Reginald and Mr. Drakeford:

VIOLATION NOTICE

On May 1, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the commercial property located at 3539 McGraw, Detroit. The purpose of this inspection was to determine the Direct Construction Services, LLC's and Douglas Reginald'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, Douglas Reginald owns the facility and Direct Construction Services, LLC performed the demolition activities at the facility. The National Emission Standard for Asbestos holds both the owner and operator liable for violations.

On May 1, 2018, it was noted that the facility had been demolished with the submittal of the required 10-day notice of intent to renovate/demolish to the DEQ AQD.

Process Description	Section Violated	Comments
Demolition of a commercial structure located at 3539 McGraw, Detroit.	40 CFR 61.145(b)(1)	Failure to provide 10 working day notification prior to demolition
	§61.150(b)(1)	Failure to deposit asbestos containing waste at a Type II landfill in accordance with the regulation.

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Please initiate actions necessary to correct the cited violation(s) and submit a written response to this Violation Notice by May 29, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include:

- Copies of all waste disposal records;
- The dates the violation(s) occurred;
- An explanation of the causes and duration of the violation(s); and whether the violation(s) are ongoing;
- A summary of the actions that have been taken and are proposed to be taken to correct the violation(s); and
- The dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Douglas Reginald and/or Direct Construction Services, LLC believes 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(s) cited at 3539 McGraw, Detroit. If you have any questions regarding the violations or the actions necessary to bring the site into compliance, please contact me at the number listed below.

Sincerely,



Joseph Goeddeke
Environmental Quality Analyst
Air Quality Division
517-331-7906

cc: Mr. Paul Max, City of Detroit, BSEED
Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Wilhemina McLemore, DEQ