



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 4, 2022

Mr. Richard Brown  
Richard Brown Contracting LLC  
5733 Klettner St.  
Saint Clair, MI 48079

Ms. Alexis Piscitelli  
United States Steel Corporation  
1 Quality Drive  
Ecorse, MI 48229

Ms. Peggy Madden  
City of River Rouge  
10600 W. Jefferson Ave.  
River Rouge, MI 48218

SRN: U822102446, Wayne County

Dear Mr. Brown, Ms. Piscitelli and Ms. Madden:

**VIOLATION NOTICE**

On December 16, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the commercial property located at 141 E. Great Lakes Avenue, River Rouge. The purpose of this inspection was to determine 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 City of River Rouge owns the property and Richard Brown Contracting LLC performed the demolition activities at the property. United States Steel Corporation is overseeing the project. The NESHAP for Asbestos holds the owner and operators equally liable for violations.

During the inspection, AQD staff observed the following: Demolition of the building at 141 E. Great Lakes Avenue continued after the Notification of Intent to Demolish had expired on December 1, 2021.

Process Description	Section Violated	Comments
Demolition of a commercial property after the expiration of the filed Notification of Intent to Demolish.	40 CFR 61.145(b)(2)	Failure to update notice to reflect a new end date.

Mr. Richard Brown, Richard Brown Contracting LLC  
Ms. Alexis Piscitelli, United States Steel Corporation  
Ms. Peggy Madden, City of River Rouge  
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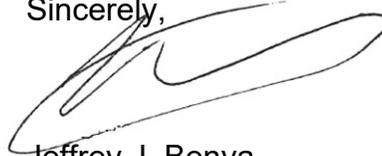
Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by January 25, 2022 (which coincides with 21 calendar days from the date of this letter). The response should include: the dates the violation occurred; an explanation of the 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 and 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 Mr. Jeffrey Benya at EGLE, AQD 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202 or [benyaj@michigan.gov](mailto:benyaj@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](mailto:wolfj2@michigan.gov).

If any party 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 the facility. 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,



Jeffrey J. Benya  
Environmental Quality Analyst  
Air Quality Division  
313-618-0372

cc: 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  
Dr. April Wendling, EGLE