



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



C. HEIDI GREYER
DIRECTOR

September 28, 2016

Mr. Juan Reyes
Air Technology Systems, Incorporated
18016 Lasher
Detroit, Michigan 48226

SRN / ID: U821609346

Dear Mr. Reyes:

SECOND VIOLATION NOTICE

On August 24, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), performed an asbestos inspection at 15870 Baylis Street, Detroit, Wayne County, Michigan. The purpose of this inspection was to determine 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, the Detroit Land Bank Authority owns the property and Air Technology Systems, Inc., performed the abatement activities at the site. The City of Detroit, Office of Contracting and Procurement, is the contract holder for the demolition and abatement, and the Detroit Building Authority is overseeing the City of Detroit's demolition program. The vacant residence was abated as part of a project to remove blight within the City of Detroit. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, DEQ AQD staff, Mr. Craig Dechy and Ms. Karen Kajiya-Mills observed the following:

The subject property had been abated on July 8, 2016. However, regulated asbestos-containing material (RACM) in the form of duct paper insulation was discovered in both the basement and in a debris pile on the second floor of the home. Additionally, yellow transite siding was observed on an exterior dormer of the subject property. During our inspection a scheduled demolition had been notified for and was slated to begin between the dates of August 8, 2016 and September 10, 2016.

Process Description	Section Violated	Comments
Failure to remove RACM in the form of duct paper insulation and transite siding at 15870 Baylis Street.	§61.145(c)(1)	Failure to remove RACM

Mr. Juan Reyes
Page 2
September 28, 2016

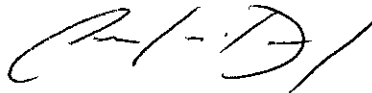
On August 29, 2016, the AQD issued you a Violation Notice citing a violation discovered as a result of an inspection and requested your written response by September 19, 2016. The violation has been reiterated above for your convenience. As of this date we have not received a response with an adequate compliance plan addressing this violation.

Please be advised that failure to respond in writing and identifying actions you will take or have taken to resolve the cited violation may result in escalated enforcement action by the AQD. Please provide the information requested in our August 29, 2016, letter by October 8, 2016, which corresponds with 10 calendar days from the date of this letter. The signed written response to this violation notice may be submitted by mail and directed to my attention at; DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909 or scanned and emailed as an attachment to me at: dechyc@michigan.gov.

If you believe the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirements cited, please provide appropriate 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 our phone conversation. If you have any questions regarding this Violation Notification or actions necessary to bring the facility into compliance, please contact me at 517-749-2891; dechyc@michigan.gov; or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig W. Dechy
Environmental Quality Analyst
Air Quality Division

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Tom Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ