



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



C. HEIDI GREYER  
DIRECTOR

August 29, 2016

Mr. Juan Reyes  
Air Technology Systems, Inc.  
18016 Lasher  
Detroit, Michigan 48219

Mr. Tim Palazzolo  
Detroit Building Authority  
500 Griswold Street, Suite 1200  
Detroit, Michigan 48226

Ms. Pura Bascos  
Detroit Land Bank Authority  
500 Griswold Street, Suite 1100  
Detroit, Michigan 48226

Ms. Iva Patterson  
City of Detroit  
Office of Contracting & Procurement  
1301 Third Street, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

SRN / ID: U821609346

Dear Ms. Bascos, Ms. Patterson, Mr. Palazzolo and Mr. Reyes:

### **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 the abatement, and the Detroit Building Authority oversees 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 investigation, 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. Enclosed are the photographs and analytical test results. A scheduled demolition has been notified for and is slated to begin between the dates of August 8, 2016 and September 10, 2016.

August 29, 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

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by September 19, 2016, (which coincides with 21 calendar days from the date of this letter). The written response should include: the date(s) 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 date(s) by which these actions will take place; and what steps are being taken to prevent a reoccurrence. The signed written response from both the owner and the operator 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 sent as an email attachment to [dechyc@michigan.gov](mailto:dechyc@michigan.gov).

If Air Technology Systems, Inc., the Detroit Land Bank Authority, The City of Detroit Office of Contracting and Procurement, and/or the Detroit Building Authority 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 extended to us during our conversations. If you have any questions regarding the violation notice or the actions necessary to bring this facility into compliance, please contact me at 517-749-2891; [dechyc@michigan.gov](mailto:dechyc@michigan.gov); or DEQ AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Sincerely,



Craig W. Dechy  
Environmental Quality Analyst  
Air Quality Division

Enclosures

cc: Dr. Abdul El-Sayed, City of Detroit  
Mr. Butch Hollowell, City of Detroit, Corporation Counsel  
Ms. LaReina Wheeler, City of Detroit, Dept. of Environmental Affairs  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Tom Hess, DEQ  
Ms. Karen Kajiya-Mills, DEQ









**BULK SAMPLE ANALYTICAL REPORT**

Fibertec IHS Project # 39051-1  
 NVLAP Accreditation #101510-0

Client Name: State of Michigan Department of Environmental Quality, Air Quality  
 Project Name: 15870 Baylis  
 Summary: 5 Submitted Bulk Samples, 5 Sample Layers Analyzed.

Date Sampled: 8/24/2016  
 Date Submitted: 8/25/2016  
 Date Analyzed: 8/25/2016

Client P.O. #: N/A  
 C.O.C. #: N/A

Fibertec Sample No.	Client I.D. No.	Description / Location	Asbestos Type	Non-Asbestos Containing Portion	Analyst
15870-1	15870-1	White fibrous material, duct paper.	Chrysotile 50%	Non-fibrous material 50%	CT
15870-2	15870-2	White fibrous material, duct paper.	Chrysotile 40%	Non-fibrous material 50% Cellulose fibers 10%	CT
15870-3	15870-3	White fibrous material, duct paper.	Chrysotile 40%	Non-fibrous material 55% Cellulose fibers 5%	CT
15870-4	15870-4	White fibrous material, duct paper.	Chrysotile 45%	Non-fibrous material 55%	CT
15870-5	15870-5	White fibrous material, duct paper.	Chrysotile 35%	Non-fibrous material 50% Cellulose fibers 15%	CT

Comments

Bulk samples are analyzed using the USEPA Test Method EPA/600/R-93/116. The constituent percent reported represents an estimate of the area percent of the component. The test report relates only to items tested. This report is not intended to be used as a product endorsement by NVLAP or any agency of the U.S. Government. Fine fibers like those in floor tile may not be discernible by this method. This report shall not be reproduced, except in full, without the written approval of the laboratory. Individual sample layers are homogeneous, unless otherwise noted. Test items were received in acceptable condition. Revision 4.0 dated 12/8/2010.

If no asbestos was/were detected in the sample/samples the acronym NAD (no asbestos detected) will appear in the Asbestos Type column of the report.

Approved Signatory: \_\_\_\_\_

*Phillip G. Rte*

Date: 08/25/16



39051-1

Analytical Laboratory

1914 Holloway Drive Holt, MI 48842
Phone: 517 699 0345
Fax: 517 699 0388
email: lab@fibertec.us

Industrial Hygiene Services, Inc.

1914 Holloway Drive Holt, MI 48842
Phone: 517 699 0345
Fax: 517 699 0382
email: asbestos@fibertecihs.com

Geoprobe

11766 E. Grand River Rd. Brighton, MI 48116
Phone: 810 220 3300
Fax: 810 220 3311

Chain of Custody #

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Client Name: SOM-MDEQ-Air Quality
Contact Person: ORAL G. DECHY
Project Name/ Number: 15870 BAYUS
Email distribution list: DECHYO@MICHIGAN.GOV
Purchase Order# 078B6600005
Table with columns: Date, Time, Sample #, Client Sample Descriptor, MATRIX, # OF CONTAINERS, HOLD SAMPLE, Matrix Code (S, A, O, P), Deliverables (Level 2, 3, 4, EDD)
Comments: \* PLEASE KEEP ALL SOM/MDEQ SAMPLES POST ANALYSIS - WE WILL PICK THEM UP
Turnaround Time ALL RESULTS WILL BE SENT BY THE END OF THE BUSINESS DAY
LAB USE ONLY