



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

December 11, 2023

VIA E-MAIL

Frank Sedgeman
Rand Environmental Services, LLC
35555 Genron Court
Romulus, Michigan 48174

SRN/ID: U472307190; Livingston County

Dear Frank Sedgeman:

VIOLATION NOTICE

On December 6, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at 727 North Street, Howell, Livingston County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), 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 my investigation, DTE Energy owns the facility and Rand Environmental Service, LLC, contracted the asbestos surveyor and performed the abatement activities. The National Emission Standard for Asbestos (NESHAP) may hold both the *owner and operator* liable for all violations.

During the inspection, EGLE, AQD staff observed the following:

The facility was not demoed, and abatement had occurred. However, additional Thermal Systems Insulation in the form of heat shield was noted in the furnace room. Rand Environmental Services, LLC had contracted American Environmental Consultants, Inc. to perform a thorough asbestos inspection of the facility. Both American Environmental Consultants, Inc. and Rand Environmental Services, LLC failed to identify the suspect material during their respective activities.

Process Description	Section Violated	Comments
On 12/6/2023, an inspection was performed at 727 North St., Howell. Heat shield was identified post abatement activities. Heat shield was not identified by the respective contractors.	40 CFR §61.145(a)	Failed to thoroughly inspect the affected facility.

VIOLATION NOTICE

Frank Sedgeman

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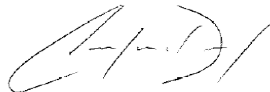
December 11, 2023

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by January 1, 2024, (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 to this violation notice, may be submitted by mail and directed to Jeremy Howe at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Jason Wolf, Enforcement Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and WolfJ2@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 extended to me during my site visit. 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; or the post office box address provided in the paragraph above.

Sincerely,



Craig W. Dechy
Senior Environmental Quality Analyst
Air Quality Division

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Robert Byrnes, EGLE
Jeremy Howe, EGLE
Jason Wolf, EGLE