



GRETCHEN WHITMER  
GOVERNOR

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



DANIEL EICHINGER  
ACTING DIRECTOR

April 12, 2023

John Stewart  
Recycle Livingston  
170 Catrell Drive  
Howell, Michigan 48843

David Peterson  
Triple D Demolition  
4337 East Grand River Avenue  
Suite 170  
Howell, Michigan 48843

SRN/ID: U472301606; Livingston County

Dear John Stewart and David Peterson:

**VIOLATION NOTICE**

On April 5, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at 170 Catrell Drive, 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, Recycle Livingston, owned the facility demolished and Triple D Demolition performed the demolition activities. The National Emission Standard for Asbestos (NESHAP) holds the *owner and operator* liable for all violations.

During the inspection, EGLE staff observed the following:

The facility was demolished; however, roof flashing debris was noted around the demolition area. The owner did have an asbestos survey done on the former storage facility, but the survey did not include the suspect roof flashing material. The roof flashing was sampled and tested. The roof flashing tested positive for asbestos fibers.

Process Description	Section Violated	Comments
On 4/5/2023, an inspection was performed at 170 Catrell Dr., Howell. The Notice of Intent to Renovate/Demolish indicated no asbestos. Roof flashing debris was observed and sampled for testing. Roof flashing tested positive for asbestos fibers.	40 CFR §61.145(a)	Failure to thoroughly inspect to facility.

## VIOLATION NOTICE

John Stewart and David Peterson

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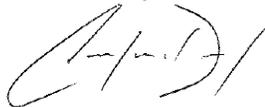
April 12, 2023

Please initiate actions necessary to correct the cited violation and submit a written response to this violation notice by May 3, 2023 (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 the *owner and operator* to this violation notice, may be submitted by mail and directed to my attention 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 [DechyC@Michigan.gov](mailto:DechyC@Michigan.gov) and [WolfJ2@Michigan.gov](mailto: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](mailto: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  
Regina Angellotti, EGLE  
Jason Wolf, EGLE