



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

July 27, 2011

**CERTIFIED MAIL**

Mr. Steve Siegbigteroth  
Rand Environmental Services, Inc.  
35555 Genron Court  
Romulus, Michigan 48174

Re: Notification of Violation  
Ford Lima Plant-1155 Bible Road, Lima, Ohio

Dear Mr. Siegbigteroth:

The Ohio Environmental Protection Agency (EPA), Northwest District Office (NWDO) received notification on June 27, 2011, for asbestos abatement at Ford Lima Engine located at 1155 Bible Road, Lima, Ohio. On July 19 and July 20, 2011, Ohio EPA inspected the Ford Lima Engine site to determine compliance with U.S. EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos and Ohio's air pollution control regulations adopted under Chapter 3745-20 of the Ohio Administrative Code (OAC).

Ohio EPA's inspection of the Ford Lima Engine site found friable pipe insulation being removed with glove bags. The friable pipe insulation in the glove bags was found not to be adequately wet.

This Notice of Violation letter is being issued for the following rule violation:

1. Violation OAC Rule 3745-20-05, "Standard for asbestos waste handling," for failure to maintain adequately wet asbestos-containing waste material.

Ohio EPA visited the site on July 20, 2011, and all the bags (approximately 120 bags) of asbestos-containing material had been opened up and re-wetted. Also, Rand environmental brought in garden hoses with sprayers to keep the friable pipe insulation wet during removal.

NWDO is requesting Rand Environmental Services submit a written response to this letter by August 10, 2011, which includes confirmation of the company's understanding of the standards for asbestos waste handling.

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Please be advised that this letter does not constitute a waiver of Ohio EPA's authority to seek civil penalties pursuant to Ohio Revised Code section 3704.06. Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date. If you have any questions, please feel free to contact me at (419) 373-3058.

Sincerely,



Amy Heller  
Division of Air Pollution Control

//lr

pc: ~~DAPC-NWDO-File~~  
Certified Mail Receipt Number 7009 1410 0001 1840 3021

ec: Tom Sattler, Supervisor, DAPC, NWDO  
Jennifer Jolliff, Supervisor, DAPC, NWDO  
Mark Budge, Manager, DAPC, NWDO  
Amy Heller, DAPC, NWDO  
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