

March 17, 2024

Mr. Jeremy Howe, Supervisor
Technical Programs Unit
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760

RE: 436/446/456 14 Mile Road, Clawson, MI (the "Property")
SRN: U632401355; Oakland County

Dear Mr. Howe:

This letter is in response to Mr. Jeffrey Benya's dated March 13, 2024 regarding a violation of the NESHAP standard for the Property. The cited violation consists of the following:

- Failure to provide ten (10) working day notification prior to demolition {§40 CFR 61.145(b)(1)}

Trowbridge Companies ("Trowbridge") and R & B Companies, LLC ("R&B") dutifully conducted an asbestos survey and performed any and all abatement activities using a licensed professional *prior to* demolition of any structures on the Property. In no event would either Trowbridge or R&B ever intentionally violate any environmental rules or regulations regarding asbestos. In fact, both Trowbridge and R&B believed that the other was providing notice to EGLE, ACD prior to demolition of the structures on the Property, so regrettably neither party did. It was a communication mishap and in no event did either party knowingly violate the law. As noted above, we are very pleased that the Property was properly surveyed and abated by a licensed professional as necessary prior to demolition activities commenced at the Property.

Mr. Benya's letter requested the following information:

- I. The dates the violation occurred;
- II. An explanation of the causes and duration of the violation;
- III. Whether the violation is ongoing;
- IV. A summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place;
- V. What steps are being taken to prevent a reoccurrence; and
- VI. Acknowledgment of receipt, and understanding of, the "Understanding NESHAP" fact sheet.

Without admitting that any violations occurred, the following are responses to the above:

- I. Dates the violations occurred
Demolition activities occurred on or about January 4, 2024.
- II. Explanation of the causes and duration of the violation

The demolition activities occurred for approximately two (2) days on the three structures on the Property.

III. Whether the violation is ongoing

There are no ongoing violations. The three structures on the Property have been demolished with an asbestos survey and abatement remediation activity being performed by a licensed professional prior to any such demolition activity commencing.

IV. Summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place

As noted above, the three facilities have been demolished. Trowbridge and R&B now fully understand the importance of verifying that notice has been sent to EGLE, AQD prior to commencement of any demolition activities falling within the purview of the NESHAP. This policy is effective immediately.

V. What steps are being taken to prevent a reoccurrence

Trowbridge and R&B will inform any and all of its site superintendents that an asbestos survey is required prior to any demolition work commencing and each project site superintendent will be instructed to not begin any renovation/demolition work until an asbestos survey is onsite and has been reviewed by the project superintendent *and* proper ten (10) day notice provided to EGLE, AQD.

VI. Acknowledgement of receipt, and understanding of, the "Understanding NESHAP" fact sheet

Trowbridge and R&B acknowledge receipt and understanding of the "Understanding NESHAP" fact sheet.

Trowbridge and R&B are committed to the safety of our workers, the public and the environment.

Please contact Trowbridge at (248) 373-5080 or R&B at (734) 637-6223 if you require any additional information at this time.

Respectfully Submitted,

Anthony Randazzo
Trowbridge Companies

Randy Heldt
R&B Companies LLC

Cc: Mr. Jason Wolf via *electronic mail* (wolfJ2@michigan.gov)