

TRENTON MI LLC

December 9, 2024

Jeffrey Benya
Senior Environmental Quality Analyst – Air Quality Division
State of Michigan
Department of Environment, Great Lakes and Energy
PO Box 30260
Lansing MI 48909-7760

RE: Trenton MI LLC
SRN/ID: U822405402

Dear Mr. Benya,

Trenton MI LLC (Trenton MI) is in receipt of the referenced violation notice sent via email and dated December 2, 2024. Trenton MI is fully committed to addressing the issues raised and the following information is provided to the Department of Environment, Great Lakes and Energy (EGLE) in response to the notice. Please note that as the property owner, Trenton MI has requested that FH ARC Abatement, Inc. provide a corresponding response as well that is being sent under separate cover.

By way of background, Trenton MI acquired the former Solutia manufacturing facility on June 30, 2022 with the intent to demolish the existing structures and promote redevelopment of the property. EnviroAnalytics Group LLC (EAG) is an affiliate of Trenton MI under common ownership that has been tasked to manage the redevelopment of the site. The former Solutia manufacturing facility has been entirely shut down and decommissioned and the only personnel on-site are performing environmental remediation work, demolition and site management.

To support demolition, EAG contracted with Turnstone Environmental Health and Safety, Inc. (Turnstone) in 2022 to provide an asbestos materials identification survey conducted in a manner to satisfy EPA National Emissions Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR 61.145 Standard for demolition and renovation and to thoroughly inspect the facility via use of appropriately licensed personnel. Subsequent to completion of the survey, EAG contracted with FH ARC Abatement, Inc. (ARC Abatement) to provide asbestos abatement services for all materials identified in the survey.

Trenton MI immediately contacted both Turnstone and ARC Abatement upon notice in October 2024 from EGLE that potential asbestos containing materials may still be present at the facility. Upon completing a joint subsequent inspection with EGLE, Turnstone and ARC Abatement were directed by Trenton MI to complete additional survey work and provide abatement of identified asbestos containing materials as soon as possible. Additional survey work was completed on November 19, 2024 and that data has been provided to ARC Abatement for their use to develop an abatement plan. It is understood that the additional survey information will be provided by ARC Abatement to EGLE as well.

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ARC Abatement will be contracted to provide all necessary remaining abatement work. Proper notice will be provided to EGLE and compliance with NESHAP regulations will be strictly required for this effort. Trenton MI has requested that the abatement work be scheduled as soon as possible in 2025 and all demolition work within the areas to be abated has been put on hold until clearance is provided.

Trenton MI remains committed to provide a safe redevelopment of this site in compliance with all regulations. Please feel free to contact me with any questions and to coordinate future site visits to inspect the ongoing work.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Becker". The signature is fluid and cursive, with the first name "Russell" and last name "Becker" clearly distinguishable.

Russell Becker
Manager