



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION



PHILLIP D. ROOS  
DIRECTOR

December 2, 2024

VIA E-MAIL

Russell Becker  
Trenton MI, LLC  
1515 Des Peres Road  
Suite 300  
Saint Louis, Missouri 63131

Warren Brown  
FH ARC Abatement, Inc.  
225 South 12th Street  
Waco, Texas 76701

SRN/ID: U822405402; Wayne County

Dear Russel Becker and Warren Brown:

**VIOLATION NOTICE**

On October 24, 2024; and November 6, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection at the commercial property located at 5045 West Jefferson Avenue, Trenton, Wayne County, Michigan. 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 our investigation, Trenton MI, LLC owns the property and FH ARC Abatement, Inc. conducted the renovation activities. The National Emission Standard for Asbestos holds both the owner and operator equally liable for violations.

During the inspection, AQD staff noted a large industrial facility slated for demolition. Two buildings on the east side of the facility were inspected. AQD staff noted suspect thermal system insulation (TSI) debris remaining from the abatement project in the crawl space of the south building, as well as several mud fittings and vermiculite in the north building. AQD staff sampled the TSI debris and took a quality control sample of the plaster ceiling remaining in the north building. Both the TSI sample and the plaster sample tested positive for asbestos. Review of the survey documentation indicates that only one type of plaster was noted within the building (at least two were present) and that material tested negative for asbestos.

Process Description	Section Violated	Comments
Demolition at a subject facility.	40 CFR 61. 145 (a)	Failure to thoroughly inspect for asbestos prior to demolition.
	40 CFR 61.145(c)(1)	Failure to remove RACM.

## VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violation and submit a signed written response to this Violation Notice by December 23, 2024 (which coincides with 21 calendar days from the date of this letter). The response should include:

- The dates the violations occurred;
- An explanation of the causes and duration of the violations;
- Whether the violations are ongoing;
- 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; and
- What steps are being taken to prevent a reoccurrence.

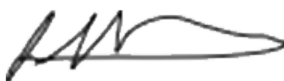
Please provide the additional survey information and the scope for the additional work discussed during the site meeting. Additional work will be subject to NESHAP notification and abatement requirements.

The signed written response from the owner and operator to this violation notice may be submitted by mail and directed to the attention of Jeff Benya, Asbestos Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to [BenyaJ@Michigan.gov](mailto:BenyaJ@Michigan.gov) and [WolfJ2@michigan.gov](mailto:WolfJ2@michigan.gov).

If the listed parties believe the above observations or statements are inaccurate or do not constitute violation(s) of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jeffrey Benya  
Senior Environmental Quality Analyst  
Air Quality Division  
313-618-0372

Enclosures: Sample results

cc: Annette Switzer, EGLE

Christopher Ethridge, EGLE

Brad Myott, EGLE

Dr. April Wendling, EGLE

Tammy Bell, EGLE

Jason Wolf, EGLE