



Environmental
Protection Agency

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

April 20, 2011

CERTIFIED MAIL

Ms. Julie Corbett, AIC
Claim Team Supervisor
State Auto Insurance Companies
P. O. Box 1980
Indianapolis, IN 46206-1980

Re: **Notice of Violation**
Demolition at 605 South Market Street, Galion, Ohio
Failure to conduct survey and submit notification of demolition.

Dear Ms. Corbett:

This letter is being written in regards to demolition of the structure at 605 South Market Street, Galion Ohio on or around July 20, 2009. The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), Division of Air Pollution Control regulates building demolition and asbestos through Ohio Administrative Code (OAC) rule 3745-20. Specifically, OAC rules 3745-20-02 and 3745-20-03 require a thorough inspection of a structure for the presence of asbestos and submittal of a notification to Ohio EPA prior to proceeding with demolition. It is NWDO's understanding that State Auto Insurance or an agent of State Auto Insurance hired Crawford Construction Company, Inc., to demolish the structure at 605 South Market Street, Galion, Ohio.

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

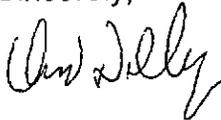
1. Violation of OAC rule 3745-20-02(A), "Standards for demolition and renovation, facility inspection, and determination of applicability," for failure to have the facility thoroughly inspected by a certified asbestos hazard evaluation specialist, prior to commencement of demolition.
2. Violation of OAC rule 3745-20-03(A), "Standard for notification prior to demolition or renovation," for failure to postmark or deliver notification of the demolition at least 10 days before beginning any demolition operation.

A fact sheet entitled "Understanding the Asbestos Notification Requirements for Facility Demolition and Renovation Activities." has been enclosed for your review. NWDO is requesting the company submit written response to this letter by May 13, 2011, which includes confirmation of the company's understanding of the asbestos survey and notification requirements.

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Please be advised that this letter does not constitute a waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The 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) 373-3130.

Sincerely,



Chad Delbecq
Division of Air Pollution Control

/llr

pc: 'DAPC-NWDO File'
Certified Receipt Number 7009 1410 0001 1840 5025

ec: Tom Sattler, Supervisor, DAPC, NWDO
Mark Budge, Manager, DAPC, NWDO
Steve Feldmann, Legal
Urvi Doshi, DAPC, CO
Tom Kalman, DAPC, CO
William MacDowell, USEPA
Chad Delbecq, DAPC, NWDO