



Environmental
Protection Agency

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

April 19, 2011

CERTIFIED MAIL

Mr. Gary Spiker
GCS Industrial Services, Ltd.
330 Tallmadge Road, Building G
Brimfield, Ohio 44240

Re: **Notice of Violation**
Demolition at 420 Monroe Avenue, Bellevue, Ohio

Dear Mr. Spiker:

The Ohio Environmental Protection Agency (EPA), Northwest District Office (NWDO) received notification on January 18, 2011, for asbestos abatement and demolition at Progress Plastic Product, Inc. located at 420 Monroe Avenue, Bellevue, Ohio. On March 10, 2011, Ohio EPA inspected the Progress Plastic Product 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).

While on site Ohio EPA visually inspected the roll off containers containing regulated asbestos-containing material (RACM) and found that they were not double lined nor were the contents adequately wet. In the first floor office area, corner beading containing dry joint compound (RACM) was laying in a pile. In addition, during abatement the floor tile was broken into several small pieces making it friable and therefore deemed RACM.

This notice of violation is being issued for the following:

1. **Standard for Asbestos Waste handling**
OAC Rule 3745-20-05(B)(1)

GCS was found in violation for failure to adequately wet the asbestos-containing materials in the roll-off boxes. During the inspection both roll-off boxes contained RACM that was dry. The liner of one roll-off box was damaged and dry material fell out of the roll-off onto the floor.

2. **Standard for Asbestos Waste Handling**
OAC Rule 3745-20-05(C)(4)

GCS was found in violation for failure to line the roll-off boxes with at least .012 inch (twelve mils) of leak-tight plastic. During the inspection the roll off boxes were lined with only one .006 inch (six mils) plastic liner.

3. **Standard for Notification Prior to Demolition or Renovation**
OAC Rule 3745-20-03(D)(1)

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GCS was found in violation for failure to amend the demolition notification within one working day when the amount of RACM affected by the demolition changes by at least twenty per cent. GCS failed to notify Ohio EPA within one working day when the floor tile being removed became friable and was considered RACM.

**4. Demolition and Renovation Procedures for Asbestos Emission Control
OAC Rule 3745-20-04(A)(6)(a)**

GCS was found in violation for failure to maintain the joint compound on the corner beading adequately wet. GCS staged the corner beading in a pile located in the first floor office area, without completely removing the joint compound (RACM). The remaining joint compound on the corner beading should have been maintained adequately wet until collected and contained for disposal.

GCS later set up the containment area again in the first floor office area to transfer the RACM into different roll-off boxes in order to properly line the new roll-offs and adequately wet the RACM. GCS also finished removing the joint compound from the corner beading and revised their demolition notification form to include the busted up floor tile as RACM.

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

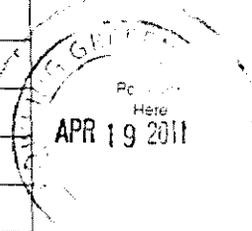
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pc: DAPC-NWDO File
Certified Receipt Number 7009 1410 0001 1840 2550

ec: Tom Sattler, Supervisor, DAPC, NWDO
Mark Budge, Manager, DAPC, NWDO
Amy Heller, DAPC, NWDO
Tom Kalman, DAPC, CO
William MacDowell, USEPA

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PS Form 3811, August 2009 See Reverse for Instructions		

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