



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL 7002 2030 0001 1808 3775
RETURN RECEIPT REQUESTED**

April 18, 2007

John Savage
Precision Environmental Company
5500 Old Brecksville Road
Independence, Ohio 44131

**NOTICE OF VIOLATION: ASBESTOS REMOVAL VIOLATIONS
Facility: Former St. Luke's Hospital (CL 07 119)**

Dear Mr. Savage:

On March 20, 2007, the Cleveland Division of Air Quality (CDAQ) inspected the former St. Luke's Hospital in Cleveland. This letter serves as notification that you are operating or have operated an asbestos removal project (ARP) in violation of the following applicable air statutes or air regulations.

Asbestos removal projects are subject to compliance with the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), Title 40 Code of Federal Regulations (CFR) Part 61 Subpart M, and the Ohio Administrative Code (OAC) Rule 3745-20.

The ARP violates 40 CFR 61.150(a)(1) and OAC 3745-20-05(B)(1)(a) because pipe insulation was not adequately wet enough to prevent asbestos fibers to escape into the atmosphere when transported to the lined dumpster and stored in the lined dumpster.

The ARP violates 40 CFR 61.150(a)(1)(iii) and OAC 3745-20-05(B)(1)(c) because pipe insulation was sticking out of the sealed containers allowing the potential for asbestos fibers to escape into the atmosphere when stored in the lined dumpster.

The ARP violates 40 CFR 61.145(c)(6)(ii) and OAC 3745-20-05(A)(2) because dust was observed once Category I floor tile became RACM when it was dropped from five to six feet in the air into the dumpster from the tow motor.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Precision Environmental Company provide assurance on better handling of ACM and not allowing emissions to the outside air. The requested information should be sent to the following enforcement representative:

Mike Samec
Cleveland Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080



Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If 14 days is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Mike Samec at (216)420-7682.

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker
Chief of Enforcement, CDAQ
GB/ms

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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5500 Old Brecksville Road • Independence, Ohio 44131
(216) 642-6040 • fax (216) 642-6041

May 16, 2007

Mr. George Baker
Chief of Enforcement
Cleveland Division of Air Quality
1925 St. Clair Avenue
Cleveland, Ohio 44114-2080

Re: Your letter dated April 18, 2007 regarding Notice of Violation for Precision Environmental from your site visit on March 20, 2007 at the former Saint Luke's Hospital.

Dear Mr. Baker:

We are in receipt of your above referenced letter.

We appreciate your agency's diligence during your visit of our project. We would however, like to address the referenced issues as follows:

1. The loading of the dumpster with Category I floor tile was addressed immediately on site by our Supervisor with the use of additional water while loading the tile into the dumpster.
2. Our on-site Supervisor was never made aware of any alleged inadequately wrapped pipe insulation being transported to or being stored in the lined dumpster. Our office was not made aware of this alleged issue until receipt of your referenced letter. Therefore, we can not specifically respond to this item.
3. Our on-site Supervisor was never made aware of any alleged pipe insulation sticking out of sealed containers. Our office was not made aware of this alleged issue until receipt of your referenced letter. Therefore, we can not specifically respond to this item.

However, our on-site Supervisor was made aware of several double wrapped and/or double bagged containers in the dumpster that had small tears no greater than 2 inches in diameter that were immediately repaired onsite.

05/16/07 07:59 FAX 216 642 0891

PRECISION ENVIROMENTAL

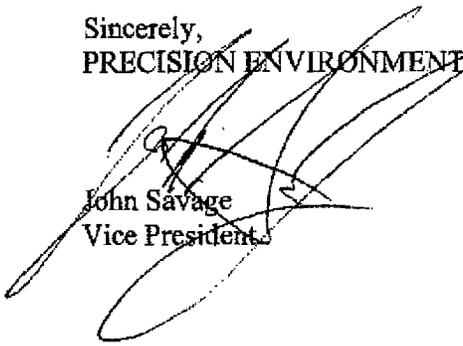
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Please be aware that we take great pride in the quality of our work at Precision Environmental Company. As always, we shall continue to conduct our asbestos abatement operations in compliance with 40 CFR 61 and OAC Chapter 3745-20.

A positive working relationship with your office is very important to Precision Environmental Company. We wish to continue well into the future.

Again, thank you for your assistance. If you have any questions please feel free to call me anytime at (216) 642-6040.

Sincerely,
PRECISION ENVIRONMENTAL COMPANY



John Savage
Vice President



5500 Old Brecksville Road • Independence, Ohio 44131
(216) 642-6040 • fax (216) 642-6041

FACSIMILE COVER LETTER

Date: 5/16/07

Time: _____

Recipient's Fax Number: (216) 420-8047

Company: CDAQ

Attention: Mr. George Baker

RE: NOV 4/8/07

From: Marc Garland

Faxed By: _____

Number of Pages (Including Cover Sheet): 3

Comments: _____

Please deliver these pages to the name shown above. If you do not receive all of the pages indicated, please contact our office as soon as possible.

Thank You.



City of Cleveland

Frank G. Jackson, Mayor

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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7002 2030 0001 1808 4024
RETURN RECEIPT REQUESTED

June 5, 2007

John Savage
Precision Environmental Company
5500 Old Brecksville Road
Independence, Ohio 44131

FACILITY ID: CL 07 119

NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Savage:

This letter shall replace the "Second Notice of Violation Letter" dated May 24, 2007. Precision Environmental's response to the original Notice of Violation was received by the Cleveland Division of Air Quality (CDAQ) on May 16, 2007, but was inadvertently misdirected. CDAQ apologizes for any inconvenience or confusion that resulted from issuance of the second Notice of Violation.

On April 18, 2007, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) requiring Precision Environmental Company (Precision) to address issues observed during inspection of the former St. Luke's Hospital asbestos removal project site on March 20, 2007. CDAQ is in receipt of a corrective action plan dated May 16, 2007. The corrective action plan was received in a timely manner and appropriate steps were taken to bring the source into compliance. CDAQ has determined that no further enforcement action is warranted at this time, but reserves its right to take such action in the future if necessary.

Precision took immediate action to control dust from floor tiles that were being broken up as they were dropped into a dumpster. Precision also immediately repaired several holes that had developed in double-wrapped or double-bagged containers, and improved the wetting of removed asbestos containing material. In the corrective action plan, Precision affirmed its commitment to conduct asbestos abatement operations in compliance with 40 CFR 61 and OAC 3745-20.

CDAQ issues this letter with Ohio EPA's concurrence and does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Mike Samco at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA facility identification number for this asbestos removal project: CL 07 119.



Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker
Chief of Enforcement, CDAQ

GB/ms

cc: Richard Nemeth and Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
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