



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Second Floor
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

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

**CERTIFIED MAIL 7011 3500 0000 1759 9857
RETURN RECEIPT REQUESTED**

July 30, 2012

Michael Pierce
President
Integrity Environmental
5300 Mardale Avenue
Bedford Heights, Ohio, 44146

**RE: 13215 DETROIT AVENUE
PROJECT ID: CL 12-746
NOTICE OF VIOLATION : Asbestos NESHAP Violation**

Dear Mr. Pierce:

On May 22, June 26, and July 24, 2012, the Cleveland Division of Air Quality (CDAQ) inspected an Integrity Environmental asbestos removal project located at 13215 Detroit Avenue in Lakewood. This letter serves as notification that you are in violation of the following applicable air statutes, air regulations, or air permit conditions.

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, the Ohio Administrative Code (OAC) Rule 3745-20, and Ohio Revised Code Chapter 3704.05(G).

Integrity Environmental performed asbestos abatement after their Ohio Environmental Protection Agency Notification of Demolition and Renovation (Ohio EPA Notification) expired on June 1, 2012. The notification was not revised until June 21, 2012.

On July 24, 2012, CDAQ witnessed Integrity Environmental performing asbestos abatement past the dates specified on their Ohio EPA Notification. The notification expired on July 16, 2012, but abatement work continued until July 24, 2012.

The abatement project at 13215 Detroit Avenue violated 40 CFR Part 61.145(b)(3)(iv)(A), and OAC Rule 3745-20-03(A)(3)(d)(i) for failing to submit a written revised notice of the new start date.



Also, the abatement project at 13215 Detroit Avenue violated 40 CFR Part 61.145(b)(3)(iv)(C), and OAC Rule 3745-20-03(A)(3)(d)(iii) for operating on a date other than the date contained in the written notice.

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance.

CDAQ requests that Integrity Environmental submit a corrected Ohio Environmental Protection Agency Notification of Demolition and Renovation (Ohio EPA Notification) which reflects the days asbestos removal took place, and a corrective action plan outlining what steps will be taken in the future to avoid the violations that are above noted.

The corrected Ohio EPA Notification and the corrective action plan shall be submitted within fourteen (14) days of your receipt of this letter to the following enforcement representative:

Bryan Sokolowski
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there 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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA project identification number: CL 12 - 746.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/BS LK



cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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Integrity Environmental Service Inc.

Where we promote performance not promises

Phone: 216-440-2075

Fax: 440-735-1528

5300 Mardale Ave. Bedford Hts. Ohio 44146

Integrity5300@Aol.com

August 30, 2012

OHIO EPA
1920 Erie view Plaza
Cleveland, OH 44114

Dear Sir/Madame:

Integrity Environmental Abatement Services, Inc. (IEAS) regrets that we neglected to provide the appropriate ending date for the project that was in Lakewood, Ohio. The fact is that we were so concern about the project failing the final inspection by Ohio Department of Health that we forgot to submit the revision for the correct ending date. IEAS will diligently submit the proper revisions when necessary in the future. We will in the future place reminders in my Blackberry that will alert me about future significant dates.

We thank you for your leniency in regards to the Lakewood project and assures you that it will not happen again in the future.

Sincerely,

Michael L. Pierce

President

**OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION**

Operator Project #	Postmark	Date Received	Notification #				
I. Type of Notification (check one): <input type="checkbox"/> Original <input checked="" type="checkbox"/> Revised <input type="checkbox"/> Canceled							
II. Facility Description (include building name, number, and floor or room number)							
Building Name: <u>Office building</u>							
Address: <u>13215 Detroit Avenue</u>							
City: <u>Lakewood</u> State: <u>OHIO</u> Zip Code: <u>44107</u> County: <u>Cuyahoga</u>							
Site Location (specific): <u>Through-out Facility</u>							
Building Size (square feet): <u>1,620</u> # of Floors: <u>3</u> Age in Years: <u>70</u>							
Present Use: <u>Vacant</u> Prior Use: <u>Office building</u>							
III. Type of Operation (check one): <input checked="" type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training							
IV. Is Asbestos Present? (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
V. Facility Information							
Owner Name: <u>FDBT, LLC</u>							
Address: <u>24100 Charagin</u>							
City: <u>Beachwood</u> State: <u>OH</u> Zip Code: <u>44122</u>							
Contact: <u>Alan Berger</u> Telephone: <u>(216) 371-4737</u> Fax: <u>(216) 371-4738</u>							
Removal Contractor Name: <u>Integrity Environmental</u> License # <u>1887</u>							
Address: <u>5300 Mordale ave.</u>							
City: <u>Bedford Hts</u> State: <u>Oh.</u> Zip Code: <u>44146</u>							
Contact: <u>Michael Pierce</u> Telephone: <u>(216) 440-2075</u> Fax: <u>(216) 916-0597</u>							
Other Operator (demolition/general): <u>OBO Demolition</u> License # <u>1053494</u>							
Address: <u>2824 E 75th Street</u>							
City: <u>Cleveland</u> State: <u>OH</u> Zip Code: <u>44104</u>							
Contact: <u>Tony Cuywood</u> Telephone: <u>(216) 391-2474</u> Fax: <u>(216) 391-2421</u>							
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II nonfriable ACM:							
Ohio Asbestos Hazard Evaluation Specialist: <u>Eric Brown</u> # <u>ES 34113</u>							
Name <u>Eric Brown</u> Certification # <u>ES 34113</u>							
VII. Approximate Amount of Asbestos Materials: <u>8,160 SF.</u> <u>175 LF.</u> <u>50 SF. Pipe F: 4 in</u>							
	RACM to be Removed	Nonfriable Asbestos Material to be Removed		Nonfriable Asbestos Material NOT to be Removed			
		Category I	Category II	Category I	Category II		
Pipes (linear feet)	<u>175 / 25 LF.</u>			<u>ROOFING</u> <u>1160 SF.</u>			
Surface Area (square feet)	<u>8,160 / 50 SF.</u>			<u>FIBROUS</u> <u>340 SF.</u>			
Facility Components (cubic feet)				<u>Mastic</u> <u>1,575</u>			
VIII. Scheduled Dates Demolition or Renovation: Start: <u>7-25-12</u> Complete: <u>8-30-12</u>							
IX. Dates for Asbestos Removal (MM/DD/YY) Start: <u>5-21-12</u> Complete: <u>7-24-12</u>							
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Hours of Operation:	<u>8:00 - 4:30</u>						
Complete all unshaded spaces, except demolitions which involve less than 260 linear feet, 160 square feet, or 35 cubic feet of RACM, need not complete spaces VII, XI, XII, XIII, XIV, and XV. Notifications for Emergency Demolition or Emergency Renovation must supply attachments.							

OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION

X. Descriptions of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and descriptions of affected facility components:

RAZE STRUCTURE FROM TOP TO BOTTOM. WATER DOWN SITE DURING DEMOLITION TO CONTROL DUST.

XI. Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: Full Containment, Negative Pressure enclosure

WATER DOWN SITE DURING DEMOLITION TO CONTROL DUST, Double bag, Sealed with Duct tape and dispose of Property

XII. Waste Transporter #1

Name: Cooper Disposal
Address: 1431 Broadway
City: Cleveland State: OH Zip Code: 44103
Contact: Mike Cooper Telephone: 440-250-9800 Fax: 440-250-9822

Waste Transporter #2

Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Contact: _____ Telephone: _____ Fax: _____

XIII. Waste Disposal

Name: Minerva Enterprises
Address: Minerva Drive
City: Waynesburg State: OH Zip Code: _____
Contact: _____ Telephone: 330-866-3534 Fax: _____

XIV. Emergency Demolition (complete Item XIV and all other sections, only if this project is an Emergency Demo.)

1. Attach a copy of the Order to this notice.
2. Name of Authority Issuing Order: N/A Title: _____
3. Authority of Order (Citation of Code): _____
4. Date of Order (MM/DD/YY): _____ Date Order to Begin: _____

XV. Emergency Renovation (Attached separate sheet with the following information if project is Emergency Repo.)

1. Date and Hour of the Emergency
2. Description of the Sudden, Unexpected Event: N/A
3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden.

XVI. Demolition of procedures to be followed in the event that unexpected RACM is found or nonfriable ACM becomes crumbles, pulverized or reduced to powder.

Immediately wet material, place in proper containers and notify responsible party

XVII. I certify that an individual trained in the provisions of NESHAPS (40 CFR Part 61, SUBPART M) will be on-site during the Demolition or Renovation and evidence that required training has been accomplished by this person will be available during normal business hours.

Michael Pierce Date 8/28/12 Michael Pierce Supervisor
Signature of Owner/Operator Type or Print Name and Title

XVIII. I acknowledge the existence of laws prohibiting the submission of false or misleading statement and I certify that facts contained in this notification are true, accurate, and complete.

Michael Pierce Date 8/28/12 Michael Pierce Supervisor
Signature of Owner/Operator Type or Print Name and Title

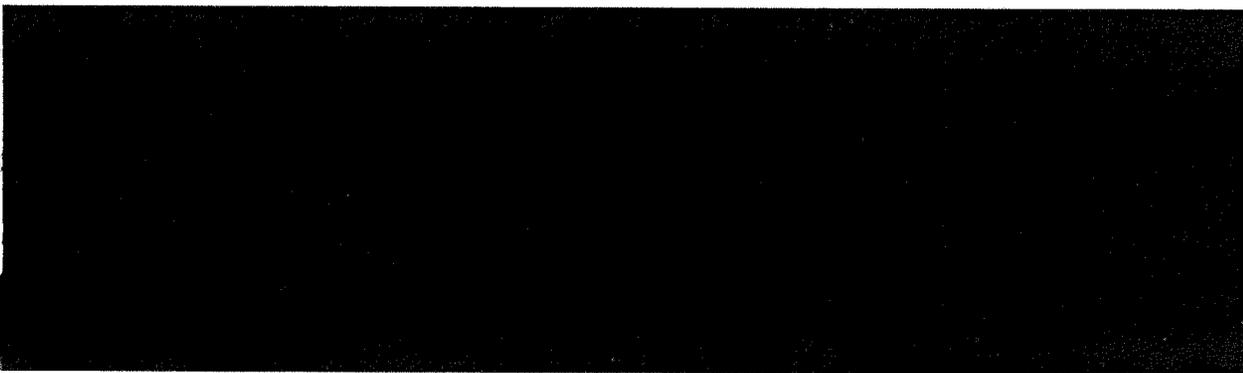
Original Notification must be mailed or hand-delivered at least ten working days (Monday-Friday excluding weekends) before demolition or renovation begins, except emergency demolitions and emergency renovations (see regulation) which must be submitted as soon as possible before operations begin. (Form Revised 11/12/97)

Michael L Pierce

5300 Mardale Ave. Bedford Hts. Ohio 44146

Integrity5300@Aol.com

Brian S.





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Frank G. Jackson, Mayor

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

**CERTIFIED MAIL 7011 3500 0000 1759 6986
RETURN RECEIPT REQUESTED**

September 5, 2012

Michael Pierce
President
Integrity Environmental
5300 Mardale Avenue
Bedford Heights, Ohio 44146

PROJECT ID: CL 12 – 746

**RESOLUTION OF VIOLATIONS
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Pierce:

On May 22, June 26, and July 24, 2012, the Cleveland Division of Air Quality (CDAQ) inspected an Integrity Environmental asbestos removal project located at 13215 Detroit Avenue in Lakewood.

On July 30, 2012, CDAQ issued a Notice of Violation requesting that Integrity Environmental submit a corrected Ohio Environmental Protection Agency Notification of Demolition and Renovation (Ohio EPA Notification) which reflects the days asbestos removal took place, and a corrective action plan outlining what steps will be taken in the future to avoid such violations.

On August 17, 2012, CDAQ was notified that the Notice of Violation was not received by Mr. Pierce. Later that day Mr. Pierce picked up a copy of the Notice of Violation from CDAQ.

On August 30, 2012, CDAQ received a corrected Ohio EPA Notification, and a corrective action plan stating that Integrity Environmental will diligently submit the proper revisions when necessary in the future, and will set reminders that will alert when dates are expiring.

The corrective action plan was received 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.

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 Bryan Sokolowski at (216) 420-7663. All correspondence with CDAQ must include the Ohio EPA project identification number: CL 12 - 746.

Sincerely,

A handwritten signature in black ink that reads "Valencia White".

Valencia White
Chief of Enforcement, CDAQ

VW/BS 

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
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