



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
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 7010 1870 0000 6591 4902
RETURN RECEIPT REQUESTED**

December 16, 2011

Robert Parks
SafeAir Contractors, Inc.
9342 Pinecone Drive
Mentor, Ohio 44060

**FACILITY ID: CL 12 202
NOTICE OF VIOLATION: NESHAP VIOLATIONS**

Dear Mr. Parks:

On December 13, 2011, the Cleveland Division of Air Quality (CDAQ) inspected site address 1001 Eddy Road located in East Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Demolition 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 the Ohio Revised Code Chapter 3704.05(G).

The demolition project violated 40 CFR Part 61.145(b)(4)(ix) and OAC Rule 3745-20-03(A)(4)(m) for failing to provide the correct completion dates listed on the Notification of Demolition and Renovation. [Observed on December 13, 2011]

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that SafeAir Contractors, Inc. submit a revised Notification of Demolition and Renovation and a corrective action plan stating how future violations will be prevented to the following enforcement representative:

Mike Samec
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 Mike Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA facility identification number CL 12 202.

Sincerely,

Linda Kimmy
Field Enforcement Manager

LK/ms

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\Cuyahoga County Land Bank\1001 Eddy Road\2011-11-11 NOV.docx

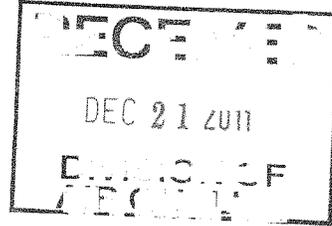


CONTRACTORS, INC.

"for all your environmental solutions"

9342 Pinecone Dr.
Mentor, Ohio 44060
(440) 639-1191
Fax: (440) 639-1194

December 20, 2011



Attn: Mr. Mike Samec
Cleveland Division of Air Quality
75 Erieview Plaza – 2nd Floor
Cleveland, OH 44114-1839

RE: CL 12 202
Notice of Violation
1001 Eddy Road, East Cleveland

Dear Mr. Samec,

SafeAir Contractors, Inc. (SAI) received the above "Notice of Violation" in regards to 1001 Eddy Road, East Cleveland on 12/20/11.

SafeAir completed the proper EPA form, Notification of Demolition and Renovation, on 11-7-11 and mailed the same to the CDAQ. This notification was for the Asbestos Abatement of 16 SF of TSI on basement duct boots at the facility. The project was notified to start on 11-25-11 and be completed on 11-26-11 for which it was. We did not perform demolition of the facility as I interpret the NESHAP Violations letter dated 12-16-11 to state. We only removed the asbestos.

SAI completed the EPA notification form properly, submitted it timely and completed the asbestos abatement properly on the dates notified for. I believe that there is confusion on what was SafeAir's work/responsibility and the demolition contractor's responsibilities. I do not believe that SAI is to be considered for any violation on this project. Please reconsider your facts and violation notification.

If you have any questions or comments, please feel free to contact me. Thank you.

Sincerely,

Robert J. Parks

- Asbestos Abatement • Confined Space • Lead Paint Abatement • Demolition • Storage Tank Removal • Storage Tank Cleaning and Inspections • Contaminated Soil Remediation • Hazardous Waste Clean-up • Hazardous Waste Transporting / Disposal



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

**CERTIFIED MAIL 7000 0600 0022 4716 6276
RETURN RECEIPT REQUESTED**

January 20, 2012

Robert Parks
SafeAir Contractors, Inc.
9342 Pinecone Drive
Mentor, Ohio 44060

**FACILITY ID: CL 12 202
NOTICE OF VIOLATION FOLLOW-UP LETTER**

Dear Mr. Parks:

On December 16, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation regarding the asbestos project located at 1001 Eddy Road requiring SafeAir Contractors, Inc. to submit a revised Notification of Demolition and Renovation and a corrective action plan. CDAQ is in receipt of a corrective action plan dated December 21, 2011.

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.

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 Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA identification number CL 12 202.

Sincerely,

A handwritten signature in cursive script that reads "Linda Kimmy".

Linda Kimmy
Field Enforcement Manager, CDAQ

LK/ms

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\Cuyahoga
County Land Bank\1001 Eddy Road\2011-11-11 NEAR.docx



CONTRACTORS, INC.

"for all your environmental solutions"

9342 Pinecone Dr.
Mentor, Ohio 44060
(440) 639-1191
Fax: (440) 639-1194

January 25, 2012

Attn: Mr. Mike Samec
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, Oh 44114-1839
Email: msanec@city.cleveland.oh.us

Re: Demolition-Cuyahoga Land Bank

Dear Mr. Samec,

SafeAir Contractors, Inc. (SAI) submits this correspondence as a notice that if the Cleveland Division of Air Quality receives any Notifications/Revisions for Demolition for which the Cuyahoga County Land Bank (CCLB) is listed as the Owner, as compared to Notifications for Asbestos Removal, and it is signed by SAI, Robert Parks, than they are not to be considered valid. SAI will not sign any notifications for the Demolition of any house or facility that CCLB has Ownership of. SAI will sign Notifications for Asbestos Abatement only. This statement is not a comment on CCLB, for their interest is with good intentions; it is only to protect SAI from any responsibilities/ownership of any acts that the Demolition process may have including the notification process, any information on the Demolition form and any acts of the Demolition Contractor prior to demo, during demo or post demo.

If you have any questions or comments then please feel free to contact me. Thank you in advance for your cooperation.

Sincerely,
Robert Parks
SafeAir Contractors, Inc.

A handwritten signature in black ink, appearing to read "R. Parks", is written over the typed name "Robert Parks". The signature is fluid and cursive.

- Asbestos Abatement • Confined Space • Lead Paint Abatement • Demolition • Storage Tank Removal • Storage Tank Cleaning and Inspections • Contaminated Soil Remediation • Hazardous Waste Clean-up • Hazardous Waste Transporting / Disposal



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

**CERTIFIED MAIL 7000 0600 0022 4716 6238
RETURN RECEIPT REQUESTED**

January 31, 2012

Mark Brookins
Ginmark
6862 Bridlewood Lane
Valley City, Ohio 44280

**FACILITY ID: CL 12 202
NOTICE OF VIOLATION: NESHAP VIOLATIONS**

Dear Mr. Brookins:

On December 13, 2011, the Cleveland Division of Air Quality (CDAQ) inspected site address 1001 Eddy Road located in East Cleveland. This letter serves as notification that you are operating sources in violation of the following applicable air statutes, air regulations, or air permit conditions.

Demolition 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 the Ohio Revised Code Chapter 3704.05(G).

The demolition project violated 40 CFR Part 61.145(b)(4)(ix) and OAC Rule 3745-20-03(A)(4)(m) for failing to provide the correct demolition completion dates listed on the Notification of Demolition and Renovation. [Observed on December 13, 2011]

The demolition project violated 40 CFR 61.145(b)(4)(x) and OAC Rule 3745-20-03(A)(4)(j) for failing to follow the description of planned demolition to be performed by not watering down the structure during demolition. [Observed on December 13, 2011]

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Ginmark submit a revised Notification of Demolition and Renovation and a corrective action plan stating how future violations will be prevented to the following enforcement representative:



Mike Samec
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 Mike Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA facility identification number CL 12 202.

Sincerely,

A handwritten signature in cursive script that reads "Linda Kimmy".

Linda Kimmy
Field Enforcement Manager

LK/ms

cc: George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\Cuyahoga County Land
Bank\1001 Eddy Road\2011-11-11 NOV Demo.docx

| SENDER: COMPLETE THIS SECTION | COMPLETE THIS SECTION ON DELIVERY | |
|--|--|--|
| <ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. | A. Received by <i>(Please Print Clearly)</i> B. Date of Delivery | |
| 1. Article Addressed to: <div style="text-align: center;"> <p>6 in mark</p> <p>6862 Bridlewood Lane</p> <p>Valley City, OH 44060</p> </div> | C. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee | |
| 2. Article Number <i>(Copy from service label)</i> | D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No <div style="text-align: center; font-size: 1.2em;"> CL 12 202 </div> | |
| | 3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D. | |
| | 4. Restricted Delivery? <i>(Extra Fee)</i> <input type="checkbox"/> Yes | |



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Frank G. Jackson, Mayor

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

March 7, 2012

Mark Brookins
Ginmark
6862 Bridlewood Lane
Valley City, Ohio 44280

**FACILITY ID: CL 12 202
GENERAL LETTER**

Dear Mr. Brookins:

On January 31, 2012, Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation (NOV) to your company Ginmark that was sent via certified mail. The address provided on the Notification of Demolition and Renovation was 6862 Bridlewood Lane, Valley City, Ohio 44280. On February 20, 2012, CDAQ received the letter back as unclaimed. Enclosed is the original Notice of Violation that was issued on January 31, 2012.

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. All correspondence with CDAQ must include the Ohio EPA facility identification number for CL 12 202.

Sincerely,

A handwritten signature in cursive script that reads "Valencia White".

Valencia White
Chief of Enforcement

VW/ms

encl: January 31, 2012, Notice of Violation: NESHAP VIOLATIONS



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
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Cleveland, Ohio 44114-1839
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SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY

CERTIFIED MAIL 7010 1870 0000 6591 4889
RETURN RECEIPT REQUESTED

May 4, 2012

Mark Brookins
Ginmark
6862 Bridlewood Lane
Valley City, Ohio 44280

FACILITY ID: CL 12 202
NOTICE OF VIOLATION FOLLOW-UP LETTER

Dear Mr. Brookins:

On January 31, 2012, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation to Ginmark for failing to provide the correct demolition dates and not watering down the structure during demolition for 1001 Eddy Road located in Cleveland. CDAQ requested an Ohio Environmental Protection Agency Notification of Demolition and Renovation (Notification).

CDAQ is in receipt of a corrective action plan dated April 20, 2012, and a revised Notification form postmarked on November 16, 2011. Ginmark stated they have improved the record keeping methods and assure it will never happen again. Also, Ginmark stated the Cuyahoga County Land Bank is now helping with the paperwork which helps tremendously in keeping everything timely and accurate. Ginmark stated the fire hose was used with the exception for not spraying during the removal of the chimney because it was extremely tall and possibly dangerous to take down.

The corrective action plan and Notification form were 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 Mike Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA identification number for 1001 Eddy Road: CL 12 202.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ



VW/msUK

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
James Maher, Cuyahoga County Land Bank
Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\Cuyahoga
County Land Bank\1001 Eddy Road\2011-11-11 NEAR Demo.docx

Dear Ms. White;

April 18, 2012

I'm in receipt of your letter dated January 31, 2012 regarding the demolition of 1001 Eddy Road Identification # CL12 202.

I didn't realize that we had passed the completion date on the notification by two business days. I can assure you that we did not do this intentionally. We take pride in our work.

I have improved our record keeping methods and can assure you this will never happen again. I now understand the importance of keeping my notifications current. Also I have made several revised notifications since this violation.

The county is now helping with the paperwork which helps tremendously in keeping everything timely and accurate.

I strongly disagree with the second violation. We used the fire hose on the entire demolition process with one exception. When one of your agents stopped to observe we were not using the fire hose because we were trying to reach the chimney with the excavator and I felt it was in my best interest not to have water spraying. The water spray would have impeded our vision. Without the spray I had clear sight of the complicated and potentially hazardous section of this project. The chimney was extremely tall and possibly dangerous to take down, with the possibility of endangering me and the home next door.

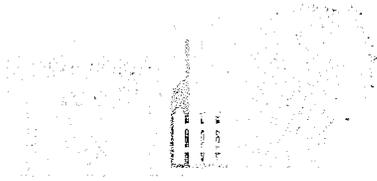
We always use the fire hose when demolishing a structure. As you are aware, demolition of a structure can generate high volumes of dust and particulates. We use the fire hose to protect the employees and neighbors from ingesting the dust.

If you have any questions please contact me at 440-823-6314.

Thanks,



Mark Brookins



Cuyahoga County Land Reutilization Corporation

323 W. Lakeside Avenue, Suite 160
Cleveland, Ohio 44113
Tel (216) 698-8853 Fax (216) 698-8972

June 28, 2012

Ms. Linda Kimmy
Field Enforcement Manager
Cleveland Division of Air Quality
75 Erieview Plaza, 2nd Floor
Cleveland, OH 44114-1839

Subject: Notice of NESHAP Violations - Project ID CL 12 202
(1001 Eddy Road, Cleveland, OH PPN 110-12-063)

Dear Ms. Kimmy,

I am writing in response to the Cleveland Division of Air Quality's (CDAQ) Notice of NESHAP Violations, dated December 21, 2011, which we received, December 27 2011. The letter indicated that "there was a failure to provide the correct completion dates listed on the Notification of Demolition and Renovation for this project (i.e. 1001 Eddy Road)."

On March 28, 2012, we received from you a Second Notice of Violation, dated March 20, 2012. The second notice states the violation in a different manner, indicating there was a failure "to provide a written notice of intention to renovate, by delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery." This letter further refers to a violation of "not waiting at least 10 working days before asbestos removal work or any other activity begins."

Because of the differences in the two letters, we are not precisely certain of what the violation is in this situation and, if this letter does not adequately respond, respectfully request a clarification. In the meantime, I would like to provide the Division of Air Quality with as much information as we have that might explain, from our perspective, what occurred and corrective actions we will take.

Abatement Phase

The abatement of the 16 SF of RACM at 1001 Eddy Rd. was performed by SafeAir Contractors, Inc. Attached is the notification, dated November 7, 2011, that was turned in by SafeAir showing the start date of November 25 and an ending date of November 26, 2011. We are unable to verify if this notification was sent to you on or before

November 14 as required, as the contractor filed his own notification. We can safely say that the work was performed on November 26, as the US EPA Waste Shipment Record for the project is signed and dated on November 26.

Demolition Phase

The demolition of 1001 Eddy Rd. was scheduled to begin by December 6 and end by December 9, 2011, as indicated in the revised notification signed by the demolition contractor, Mark Brookins of Ginmark Inc., dated November 8, 2011. CDAQ staff visited the site on December 13 and, we assume, found the demolition either not yet started or in progress, 4 days beyond the notification window. We have a photographic report of our staff site inspection dated December 16, showing demo equipment sitting on a vacant lot, which indicates that the work was just completed. We do not have a copy of any revision to the notification after the one dated November 8. We therefore must concur that the demolition notification did not correctly state the dates, as stated in the first violation notice.

Analysis of Problem

We see two issues, both stemming from our not having had access to the notifications that were submitted to CDAQ:

1. We were unable to stay on top of contractor schedules.
2. We did not have copies of submissions with which to determine if they were being done and revised properly.

Remedy

Since the time of this occurrence, and others like it, the CCLRC developed a policy whereby we take responsibility for the submission of all EPA notifications. As noted in our letter regarding 10612 Bryant Ave, we have adopted and distributed to all our contractors the following procedural changes:

The CCLRC will submit to the CDAQ all original notifications for the abatement of asbestos and demolition thereof. All contractors must provide the CCLRC with their original NESHAP Notifications which CCLRC will submit to CDAQ. CCLRC will provide copies of these documents upon request to any party in need of information on the dates for the start of abatement and demolition. Subsequent amendments to the notification forms should be submitted to CCLRC as well so that we can keep track of the start dates. As a courtesy and to standardize the notification form submission, the CCLRC has begun to prepare all forms and they will be attached to your Proceed Orders so that upon signing and accepting the work indicated in the proceed order you can fill out and return the notification form to the CCLRC.

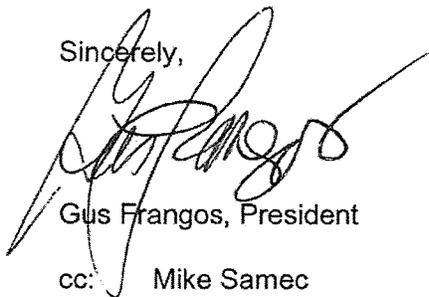
Also, as mentioned previously, the CCLRC has as a policy of terminating business with contractors who consistently fail to be thorough and to follow guidelines established in any of our programs. Due to such a policy, there are already asbestos survey contractors we do not use and demolition contractors that will not ever be used again. We also understand that even the most conscientious abatement and demolition professionals make mistakes on their start and finish dates due to weather and

unforeseen problems on other sites; therefore we will work closely with our contractors to help correct unintentional errors. If a contractor exhibits a pattern of missing performance dates, that could also be grounds for termination.

If I may make a suggestion, it would be most helpful to be able to find, at the CDAQ web site, on-line records of notifications received and anticipated start and end dates for each. This would provide certainty that items mailed to you have actually been received.

The Land Bank has been working diligently to comply with asbestos regulations. If this letter does not satisfy you that the CCLRC has addressed the violations at 1001 Eddy Rd., please contact Cheryl Stephens of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Gus Frangos", written over a white background.

Gus Frangos, President

cc: Mike Samec
George Baker
Michael Krzywicki
John Paulian
William MacDowell
Mark Brookins
Cheryl Stephens

Attachments:

SafeAir notification, dated 11.07.11
SafeAir US EPA Waste Shipment Record, dated 11.26.11
Ginmark notification revision, dated 11.08.11
CCLRC Demolition – Final Field Notes, dated 12.16.11 for 1001 Eddy Rd



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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 5873
RETURN RECEIPT REQUESTED**

July 20, 2012

Gus Frangos
Cuyahoga County Land Reutilization Corp.
323 W. Lakeside Avenue, Suite 160
Cleveland, Ohio 44113

PROJECT ID: CL 12 202

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

Dear Mr. Frangos:

On December 13, 2011, the Cleveland Division of Air Quality (CDAQ) inspected site address 1001 Eddy Road located in East Cleveland.

On December 21, 2011, the CDAQ issued a Notice of Violation (NOV) requiring Cuyahoga County Land Reutilization Corp. (CCLRC) to provide the correct completion dates on the Asbestos Notification and Renovation form.

On March 20, 2012, CDAQ issued a second NOV due to no response to the first NOV.

CDAQ is in receipt of a corrective action plan dated July 2, 2012, stating the following:

The CCLRC will submit all original notifications for the abatement of asbestos and demolition thereof. All contractors must provide the CCLRC with their original NESHAP Notification which CCLRC will submit to CDAQ. CCLRC will provide copies of these documents upon request to any party in need of information on the dates for the start of abatement and demolition. Subsequent amendments to the notification forms should be submitted to CCLRC as well so that we can keep track of the start dates. As a courtesy and to standardize the notification form submission, the CCLRC has begun to prepare all forms and they will be attached to your Proceed Orders so that upon signing and accepting the work indicated in the proceed order you can fill out and return the notification form to the CCLRC.

Also, as mentioned previously, the CCLRC has as a policy of terminating business with contractors who consistently fail to be thorough and to follow guidelines established in any of our programs. Due to such a policy, there are already asbestos survey contractors we do not use and demolition contractors that will not ever be used again. We also understand that even the most conscientious abatement and demolition professionals make mistakes on their start and finish dates due to weather and unforeseen problems on other sites; therefore we will work closely with



our contractors to help correct unintentional errors. If a contractor exhibits a pattern of missing performance dates, that could also be grounds for termination.

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 Mike Samec at 216-420-7682. All correspondence with CDAQ must include the Ohio EPA Project identification number CL 12 202.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/ms *JK*

cc: John Paulian, Ohio EPA Central Office
William MacDowell, U.S. EPA Region V
Cheryl Stephens, Cuyahoga County Land Reutilization Corp.
Jim Maher, Cuyahoga County Land Reutilization Corp.
L:\Data\Facilities\+ Programs\Asbestos\Sites\Cuyahoga County Land Bank\1001 Eddy Road\2011-12-13 ROV+NEAR Owner.docx