



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

Re: Sandusky County  
**Notice of Violation**  
Failure to submit notification 10 working  
days prior to the start of work

November 16, 2012

CERTIFIED MAIL

Mr. Mike Abdo, CEO  
Abdo Wrecking, LLC  
125 East Baker Street  
Green Springs, Ohio 44836

Dear Mr. Abdo:

This letter shall serve as follow-up to The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), Division of Air Pollution Control's November 05, November 06, and November 13, 2012 inspections of demolition at the property located at 113 Jefferson Street, Fremont, Ohio 43420. On November 05, 2012 Ohio EPA was informed of demolition activities at the property and went out to investigate. Upon arrival it was found that demolition activities were being performed. Ohio EPA spoke with you, Mr. Mike Abdo, and informed you that work was to stop immediately until further notice. Both parties agreed that Abdo Wrecking, LLC was to call the Ohio EPA the following day (November 6, 2012) to discuss the required steps to complete before demolition could continue. While continuing to look into this matter two separate phone calls were placed to Abdo Wrecking, LLC where messages were left reminding them to discontinue work at the property until this matter was resolved. Our investigation found demolition has commenced at the site with disregard to directives from the Ohio EPA to stop work and a notification of demolition still has not been submitted for this activity.

Ohio EPA's rules regarding demolition and asbestos are contained in Ohio Administrative Code (OAC) rule 3745-20. Specifically, OAC rule 3745-20-03(A) requires each owner or operator to provide a written notification of intention to demolish or renovate at least ten working days before the beginning of any demolition operation, asbestos stripping or removal work.

Mr. Mike Abdo  
November 16, 2012  
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This notice of violation is being issued for the following:

1. Violation of OAC rule 3745-20-03(A) "Standard for notification prior to demolition or renovation," for failure to notify the Ohio EPA, NWDO, 10 working days prior to the start of work.

At this time all work that would disturb the material, and all material removal shall cease until ten days after a notification of demolition is submitted to and accepted by the Ohio EPA, NWDO. Ohio EPA, NWDO is requesting that Abdo Wrecking, LLC respond to this letter as soon as possible and no later than November 29, 2012 with confirmation that the company understands the notification requirements contained in Ohio Administrative Code, 3745-20.

Please note that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case. If you have any questions, please feel free to contact me, Josh Clifton at (419) 373-3058 or Mr. Tom Sattler at (419) 373-3116.

Sincerely,



Joshua S. Clifton  
Division of Air Pollution Control

/cg

pc: Certified Mail Receipt Number 7011350000082041565

ec: Tom Sattler, DAPC, NWDO  
Mark Budge, DAPC, NWDO  
Josh Clifton, DAPC, NWDO  
Bruce Weinberg, DAPC, CO  
Brian Dickens, USEPA



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

Re: Allen County  
Notice of Violation  
Failure to Notify the Ohio EPA of a  
new start date for asbestos stripping or  
removal

November 13, 2012

CERTIFIED MAIL

Mr. Jeff Price, General Manager  
Orick Industries, Inc.  
614 East Kiracofe Avenue  
Elida, Ohio 45807

Dear Mr. Price:

This letter shall serve as follow-up to The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO), Division of Air Pollution Control's November 05, 2012, renovation inspection of the property located at 4141 North West Street, Lima, Ohio. During the inspection it was found that a portion of the abatement, which included removal of asbestos floor tile and mastic, had already been completed. When asked about the removal date of these materials Buckeye Environmental admitted work had begun prior to the date indicated on the Notification of Demolition and Renovation.

Ohio EPA's rules regarding asbestos stripping or removal work in any subject demolition or renovation that will begin on a date other than contained in the original notice are contained in Ohio Administrative Code (OAC) rule 3745-20. Specifically, OAC rule 3745-20-03(A)(3)(d) requires when the asbestos stripping or removal operation or demolition operation covered by this paragraph that will begin before the date contained in the notice, written notification is required to the Ohio EPA field office of the new start date at least ten working days before asbestos stripping or removal work begins. Delivery of the amended notice shall be by the United States postal service, commercial delivery, or hand delivery.

This notice of violation is being issued for the following:

1. Violation of OAC rule 3745-20-03(A)(3)(d) "Standard for notification prior to demolition or renovation," for failure to notify the Ohio EPA field office of the new start date at least ten working days before asbestos stripping or removal work begins.

Mr. Jeff Price, General Manager

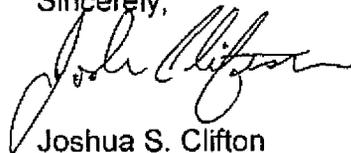
November 13, 2012

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In addition to work starting prior to the notification date, it was also found that abatement practices had rendered material that had previously been categorized as category I non-friable material into friable regulated asbestos containing material (RACM). The definition of friable asbestos material states in part "any category I or category II asbestos containing material that becomes damaged from either deterioration or attempts at removal or abatement resulting in small fragments the size of four square inches or less shall also be considered friable." The notification will need to be revised to reflect the true start date of removal and additional RACM created at the site during the removal process. This material was identified in large "rice bags" and has not been removed from the site at this time. It appears wet methods have been implemented and according to Buckeye Environmental they will re-wet the material before double bagging, sealing and placing in a lined dumpster. Ohio EPA, NWDO is requesting that Buckeye Environmental respond to this letter no later than November 23, 2012, with confirmation that the company understands the notification requirements contained in Ohio Administrative Code, 3745-20.

Please note that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. Ohio EPA will determine later whether to pursue such penalties in this case. If you have any questions, please feel free to contact me, Josh Clifton at (419) 373-3058.

Sincerely,



Joshua S. Clifton  
Division of Air Pollution Control

ec: Josh Clifton, DAPC, NWDO  
Tom Sattler, DAPC, NWDO  
Mark Budge, DAPC, NWDO  
Chad Winebrenner, DAPC, NWDO  
Bruce Weinberg, DAPC, CO  
Brian Dickens, USEPA

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