

REV_4

Department:

DAPC

DAPC

Subdepartment:

NULL

<NONE>

Program:

OTHER

DAPC - OTHER

Office Location:

CDAQ

LAA - CDAQ

Medium:

AIR

AIR

Doc Type:

NOV

NOV

Doc Subtype:

ASBESTOS

DAPC - Asbestos

Facility County:

18

18 - CUYAHOGA

Facility ID:

CL13363

CL 13 363

Date:

20121213

12/13/2012

Facility/Site/Location/Regulated Entity Name:

3912_STORER_AVENUE

3912 Storer Avenue

Your input is 18 characters long (Max 40).

Facility Address 1:

ARICKS_ENVIRONMENTAL_MGMT_SERVICE_INC

Aricks Environmental Mgmt Service Inc

Your input is 37 characters long (Max 40).

Facility Address 2:

CUYAHOGA_COUNTY_LAND_REUTILIZATION_CORP

Cuyahoga County Land Reutilization Corp

Your input is 39 characters long (Max 40).

Facility City:

CLEVELAND_

Cleveland

Facility State:

OH

OH

Facility ZIP: (00000 or 00000-0000)

44109

44109

Mailing Name:

ERIC_WITHERSPOON

Eric Witherspoon

Your input is 16 characters long (Max 40).

Mailing Address 1:

ARICKS_ENVIRONMENTAL_MGMT_SERVICE_INC

Aricks Environmental Mgmt Service Inc

Your input is 37 characters long (Max 40).

Mailing Address 2:

19718_KINGS_HIGHWAY

19718 Kings Highway

Your input is 19 characters long (Max 40).

Mailing City:

CLEVELAND_

Cleveland

Mailing State/Province:

OH

OH

Mailing ZIP: (00000 or 00000-0000 or X0X0X0)

44122-6720

44122-6720

Project Name:

CL_13_363_3912_STORER_AVE

CL 13 363 3912 Storer Ave

Project Type:

ASBESTOS_DEMOLITION

asbestos demolition

Latitude:

NULL

Longitude:

NULL



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erievue 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 2000 0002 6936 3273
RETURN RECEIPT REQUESTED

December 13, 2012

Eric Witherspoon
President
Arick's Environmental Management Service, Inc.
19718 Kings Highway
Cleveland, OH 44122-6720

RE: Demolition project at 3912 Storer Avenue
PROJECT ID: CL 13 363
NOTICE OF VIOLATION: NESHAP-Asbestos Violations

Dear Mr. Witherspoon:

On November 28, 2012, the Cleveland Division of Air Quality (CDAQ) inspected the demolition project located at 3912 Storer Avenue in Cleveland. This letter serves as notification that Arick's Environmental Management Service completed an asbestos removal project that was in violation of the National Emission Standard for Hazardous Air Pollutants (NESHAP). Asbestos removal projects are subject to compliance with the Asbestos 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 (ORC) Chapter 3704.05(G).

When CDAQ inspected the asbestos removal phase of the demolition project, the following deficient work practices were observed:

- An impermeable dropcloth was not used while working on the east face of the house.
- The regulated asbestos-containing materials (RACM) were not adequately wet during the disjoining operation. This is in violation of 40 CFR 61.145(c)(3) and Ohio Administrative Code (OAC) Rule 3745-20-04(A)(3).
- The shingles were allowed to fall to the ground instead of being carefully lowered. The failure to carefully lower the RACM to the ground, not dropping or otherwise damaging the RACM, is a violation of 40 CFR 61.145(c)(6)(ii) and OAC Rule 3745-20-04(A)(6)(b).

Unless you undertake some type of corrective action with respect to the above noted violations, you will be in non-compliance at your next asbestos shingle removal project. These deficient work practices must be corrected at your next asbestos removal project. In addition, CDAQ requests that Arick's Environmental Management Service submit a written response indicating how the above-noted deficiencies will be corrected at future transite shake shingle removal projects. Your written response must be submitted within 14 days of receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, you must submit a written response and your response must include a timeline for correcting the alleged violations.



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. If you have any questions, please call David Wagner at 216/664-3004. All correspondence with CDAQ must include the Ohio EPA project identification number for the 3912 Storer Avenue demolition project: CL 13 363.

Sincerely,

Valencia White
Chief of Enforcement, CDAQ

VW/dlw

cc: James Maher, Cuyahoga County Land Reutilization Corp.
George P. Baker, CDAQ
Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Brian Dickens, U.S. EPA Region V
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