



State of Ohio Environmental Protection Agency

Central District Office

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March 17, 2009

Ms. Barbara Koelbl
Facilities Director
Columbus Public Schools Board of Education
1907 Leonard Avenue
Suite 150
Columbus, OH 43214

Re: WARNING LETTER - Discovery of additional asbestos and request for new asbestos survey at Scioto Trails Elementary School

Dear Ms. Koelbl:

This letter serves as follow-up to Ohio Environmental Protection Agency's, Central District Office, Division of Air Pollution Control's (CDO) most recent inspection of asbestos abatement and pre-demolition activities at Columbus Public School's (CPS) Scioto Trails Elementary School, 2951 South High Street in Columbus, Ohio.

In accordance with Ohio Administrative Code (OAC) rule 3745-20-02, all facilities must be inspected for the presence of asbestos prior to commencement of demolition or renovation.

Additionally, pursuant to OAC rule 3745-20-02, this rule applies to both the **owner** and **operator** of a demolition or renovation project. Owner or operator means any person who owns, leases, operates, controls, or supervises a facility or demolition or renovation operation.

On March 10, 2009, a CDO inspector looking inside a hole in a wall observed what appeared to be friable Regulated Asbestos Containing Material (RACM) pipe insulation. Samples were collected and the material was found to contain 25-30 percent Chrysotile asbestos. Additionally, 40 percent Chrysotile RACM was discovered uncontained on the ground in a pile of demolition wastes at the rear of the school. When questioned, the abatement contractor said neither material had been identified as RACM. CDO also understands that additional asbestos, not included in the original survey, has been discovered in the soffit of the single story building addition.

Please note that based on CDO's observations and findings (additional asbestos discovered), it would appear that a thorough survey was not performed as required by OAC rule 3745-20-02(A). Please note that failure to perform a thorough inspection is a violation of OAC rule 3745-20-02(A).

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

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At this time, CDO requests CPS perform an updated asbestos survey to quantify any additional undetected RACM at Scioto Elementary School. At a minimum, this survey should include suspect building materials, steam and roof drain pipe insulation and materials found in the single story building addition. CDO also requests CPS submit a revised *Notification of Demolition and Renovation form* to reflect the new survey's findings along with any quantities of asbestos to be abated.

Finally, be advised that this warning letter in no way waives the right of Ohio EPA or United States Environmental Protection Agency to pursue additional enforcement action. Further communications may be directed to you regarding this violation or any additional violations that may be found. If you have any questions regarding this matter, please contact me at (614) 995-0671.

Sincerely,



Richard Fowler
Environmental Specialist
Division of Air Pollution Control
Central District Office

c: Adam Ward, Unit Manager, DAPC/CDO
Kelly Toth, Permits and Compliance Team Supervisor, DAPC/CDO
DAPC/CDO File

RF/ct New Survey needed