



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

RE: Wood County
Notice of Violation/Return to Compliance
Failure to remove all RACM

August 09, 2013

CERTIFIED MAIL

Mr. Rick Sheets
Midwest Environmental Control
4708 Angola Road
Toledo, Ohio 43615

Dear Mr. Sheets:

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 August 01, 2013 inspection of the former Lime City School located in Perrysburg, OH. Midwest Environmental Control (MEC) was contracted to remove all friable asbestos or asbestos that may become friable during demolition from the facility.

When NWDO arrived on site no work was being performed and it was evident that abatement activities had been completed. At the time of the inspection regulated asbestos containing material (RACM) was discovered in the basement and crawl space of the facility in the form of thermal system insulation (TSI) debris. A small portion of the debris appeared to be the direct result of abatement activities while additional material on the ground in the crawlspace appeared to have been present for some time. In addition a boiler was identified in the basement with suspect asbestos containing material components. Samples were collected by the NWDO of TSI debris that looked freshly disturbed, older looking TSI debris on the ground of the crawl space, and rope gasket material from the boiler. All three materials came back positive for asbestos.

Ohio Administrative Code (OAC) 3745-20-04 requires all RACM to be removed from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the materials.

This notice of violation is being issued for the following:

1. Violation of OAC rule 3745-20-04 "Demolition and renovation procedures for asbestos emission control." for failing to remove all RACM from a facility to be demolished.

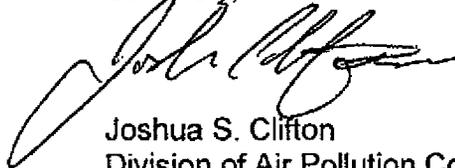
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After these violations were explained, MEC returned to the facility on August 02, 2013 to remove all RACM that remained. Work was completed on August 06 and NWDO returned to the site to re-inspect the facility on August 07. The re-inspection consisted of checking the basement and crawl space for any additional RACM. All regulated material appeared to have been removed from the facility and the floor of the basement had been cleaned.

By returning to the facility and removing the remaining RACM prior to demolition, Midwest Environmental has returned to compliance.

Please note that the submission of any 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 you can email me at josh.clifton@epa.ohio.gov, or contact me by phone at (419) 373-3058.

Sincerely,



Joshua S. Clifton
Division of Air Pollution Control

/cg

pc: Certified Mail Receipt Number 70091410000118346397

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