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October 30, 2017

Mr. Robert Wolf, Manager
Oak Ridge Largo, LLC
4706 18th Avenue
Brooklyn, NY 11204

Re: Notice of Violation - Oak Ridge Apartments, 13333 Ridge Road

CERTIFIED MAIL: 7015 3010 0002 1821 2249

Mr. Wolf:

Pursuant to Chapters 78-601 and 90-403, Laws of Florida, and the rules promulgated therein, which authorizes and empowers the Pinellas County Air Quality Division to control, abate and prohibit pollution of the air in Pinellas County, Florida, you are hereby notified of findings which indicate that violations of the Pinellas County Code has taken place as follows:

1. Pinellas County Code, Section 58-149(a). National emission standard for asbestos 40 CFR, Part 61, Subpart M, 61.145 Standard for demolition and renovation

Notification requirements. Each owner or operator of a demolition or renovation activity to which this section applies shall:

(1) Provide the Administrator with written notice of intention to demolish or renovate. Delivery of the notice by U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.

(3) Postmark or deliver the notice as follows:

(i) At least 10 working days before asbestos stripping or removal work or any other activity begins (such as site preparation that would break up, dislodge or similarly disturb asbestos material), if the operation is described in paragraphs (a) (1) and (4) (except (a)(4)(iii) and (a)(4)(iv)) of this section. If the operation is as described in paragraph (a)(2) of this section, notification is required 10 working days before demolition begins.

Specifically, Oak Ridge Largo, LLC caused asbestos stripping and removal activities, described as disturbance of approximately 2,345 square feet of Regulated Asbestos Containing Material (RACM) popcorn ceiling texture, to be performed at the referenced facility, without first submitting written notification to the Pinellas County Air Quality Division, ten working days prior to commencement of renovation activities.

2. Pinellas County Code, Chapter 58, Section 58-149(a). National emission standard for asbestos 40 CFR, Part 61, Subpart M, 61.145 Standard for demolition and renovation.

(c)(1) Remove all Regulated Asbestos Containing Material (RACM) from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal.

Pinellas County Air Quality
509 East Ave. S. • Suite 138
Clearwater, FL 33756
Main Office: (727) 464-4422
FAX: (727) 464-4420
V/TDD: (727) 464-4062

www.pinellascounty.org



Specifically, all RACM was not removed from the referenced facility prior to the commencement of renovation activities. The renovation activities dislodged RACM from the ceilings of the referenced facility and the disturbed RACM was found in and about the affected areas of the facility.

3. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, SUBPART M, 61.145 Standard for demolition and renovation.

(c)(3) When Regulated Asbestos Containing Material (RACM) is stripped from a facility component while it remains in place in the facility, adequately wet the RACM during the stripping operation;

Specifically, RACM was stripped from the referenced facility without adequately wetting the material. The dry disturbed RACM was observed in and about the affected areas of the facility.

4. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, Subpart M, 61.145 Standard for demolition and renovation.

(c)(6) Adequately wet the Regulated Asbestos Containing Material and ensure that it remains wet until collected and contained or treated in preparation for disposal.

Specifically, previously stripped RACM did not remain wet and was not properly collected or contained for disposal. Inspection determined no wetting of the stripped RACM was performed. Additionally, the dry asbestos containing waste material was disposed of in an open-air waste container.

5. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, Subpart M, 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

(a) (1) (iii) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet;

Specifically, disturbed RACM was not contained in leak-tight containers until transport and disposal. Stripped, dry RACM waste was observed in and about the affected areas of the facility and in an open-air waste container located on the facility grounds.

6. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, SUBPART M, 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

(a) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (a)(1) through (4) of this section.

Specifically, dry and disturbed asbestos containing waste material from the stripping operations was observed on the facility grounds and in an open-air waste container located on the facility grounds

7. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, SUBPART M, 61.145 Standard for demolition and renovation.

(c) (8) Effective 1 year after promulgation of this regulation, no RACM shall be stripped, removed, or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them, is present.

Specifically, a trained on-site representative was not present during the removal of RACM.

8. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, Subpart M, 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

(b) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at: (1) A waste disposal site operated in accordance with the provisions of § 61.154; and (d) For all asbestos-containing waste material transported off the facility site: (2) Provide a copy of the waste shipment record, described in paragraph (d)(1) of this section, to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.

Specifically, dry RACM waste material from the renovation operation was found on site in a waste container owned by the City of Largo. This material was not identified as regulated asbestos containing waste.

9. Pinellas County Code, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, SUBPART M, 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

(a)(iv) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(4) or 1926.1101(k)(8). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.

(v) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.

Specifically, inspections by PCAQD personnel did not find any of the waste materials wrapped or labeled as per regulation requirements.

10. Pinellas County Code, Chapter 58, Sec. 58-149(a). National emission standard for asbestos 40 CFR, Part 61, SUBPART M, 61.150 Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations.

(5)(c) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of §§61.149(d)(1) (i), (ii), and (iii).

Specifically, investigation by PCAQD personnel revealed markings (signage) were not placed on work vehicles.

Based on the facts stated above, and on the results of inspections on September 5, 6, and 7, 2017 at the Oak Ridge Apartments, located at 13333 Ridge Road, Largo, this serves as a Notice of Violation.

Respond By Phone and in Writing within 10 Days

Please call Cari Burchfield upon receipt of this letter to discuss the resolution of the violations for which Oak Ridge Largo, LLC may be responsible and follow-up in writing explaining the circumstances that may have led to the alleged violations and propose any corrective action deemed necessary to bring the facility back in compliance. You have the opportunity to request a conference if you feel that the violations did not occur and can provide supporting evidence. The initial discussion with the Division and follow-up written response will not absolve Oak Ridge Largo, LLC of potential civil penalty.

If Oak Ridge Largo, LLC does not submit the follow-up written response within ten (10) calendar days of receipt of this Notice of Violation, a Consent Order will be issued specifying compliance conditions along with a penalty of \$42,021.25.

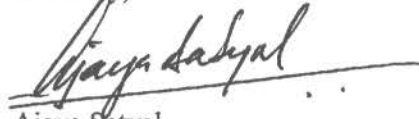
Potential Enforcement Action

Operation of a source in violation of Pinellas County Code, Chapter 58, may result in liability for damage and restoration and judicial imposition of a civil penalty up to a maximum of \$10,000 per violation, per day, pursuant to chapters 78-601 and 90-403, Laws of Florida. Continuation of activities in violation of existing regulations can result in fines being levied for each and every day a violation takes place. Violations may be resolved through entry into a Consent Order or formal enforcement action.

Failure to respond to this notice, or comply within the specified time frames, may result in commencement of civil, administrative or criminal action for injunctive relief and the assessment of civil and/or criminal penalties as provided by this Code, and the Florida Statutes. Also, the State of Florida, Department of Environmental Protection, reserves the right to take enforcement actions related to the potential violations cited above.

If you have any questions regarding this matter, please contact Cari Burchfield at (727) 464-4422.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajaya Satyal", is written over a horizontal line.

Ajaya Satyal
Air Quality Division Manager

Copy: Mr. Raymond Katz, Oak Ridge Largo, LLC (sent via email to: sales@novelties29.com)
Case File, Read File