



Lake Orion Community Schools Operational Services

Community Educations Resource Center
455 E. Scripps Road, Lake Orion, MI 48360

Phone: 248•814•1798

Wes Goodman
Director of Operations

August 22, 2023

Mr. Jeffrey Benya
Senior Environmental Quality Analyst
EGLE
AQD Detroit District Office
3058 West Grand Boulevard
Detroit, Michigan 48202
benyaj@michigan.gov

RE: Lake Orion Community Schools, SRN: U632301931, Oakland County
Blanche Sims Elementary School
Supplemental Violation Response Letter

Dear Mr. Benya:

In accordance with the above referenced violations, Lake Orion Community Schools (LOCS) respectfully submits the following background information and explanations for why asbestos tectum cord insulation materials were not removed prior to demolition activities at Blanche Sims Elementary School:

- LOCS retained the services of Arch Environmental Group, Inc. (AEG) for the intent of conducting a NESHAP Asbestos Inspection of Blanche Sims Elementary School prior to proposed demolition of the facility beginning in June 2023. The initial inspection was completed in November 2021. During the initial inspection, AEG identified the asbestos tectum cord insulation material. Informal discussions were had between LOCS, Frank Rewold & Sons, and AEG to determine the most efficient method for removal of the material.
- In March 2022, the above parties met with an EGLE representative to further discuss the most appropriate method for removal of the tectum cord material prior to demolition activities. It was determined that material was most likely friable; however, further investigation and sampling was suggested by the EGLE representative to determine whether the material could safely be removed from the interior of the building under negative pressure enclosure conditions. Conversely, if the material was determined to wrap around on the topside of the tectum panels, the material could be considered part of the building roofing structure and thereby removed as part of demolition activities. The EGLE representative recommended appropriate sampling of roofing materials to determine the extent and location of the tectum cord materials.
- AEG, with the assistance of a roofing contractor, collected additional core samples of roofing materials including the roof deck on August 30, 2022. The intent of the sampling was to confirm that the tectum cord material was entirely contained within the tectum ceiling panels and did not wraparound and impact roof deck materials. All sample results were negative for asbestos. These results suggest that the tectum cord materials could safely be removed from within the building utilizing negative pressure enclosures. Sample results from August 30, 2022 are attached.
- Subsequent to the final determination that the tectum cord insulation could be safely removed within negative pressure enclosures, the asbestos abatement project design was developed and included within the Project Manual "*Lake Orion*

Community Schools 2018 Bond Program New Blanche Sims Elementary School Re-Bid – Demolition and Landscaping” as released by Frank Rewold & Sons on January 26, 2023. The asbestos abatement section of the manual clearly indicated that tectum cord insulation materials were required to be abated within negative pressure enclosures.

- Frank Rewold & Sons and AEG conducted a site walkthrough with prospective demolition/abatement contractors on February 2, 2023. During the walkthrough, several contractors asked how the tectum cord materials could be abated. A definitive method was left up to the discretion of the contractor; however, it was again indicated that the materials must be removed under a negative pressure enclosure.
- Detroit Environmental Solutions (DES) and Blue Star, Inc. (Blue Star) started asbestos abatement activities at Blanche Sims Elementary School on June 12, 2023. All materials, with the exception of tectum cord insulation, were abated between June 12-22, 2023. Subsequent to the completion of these abatement activities, Blue Star started demolition of the remainder of the building with the intent of disposing of remaining materials, including tectum cord insulation materials as general construction debris. AEG personnel indicated this was not acceptable, and the materials would need to be removed under negative pressure enclosures. As some areas of the building were already demolished, AEG indicated that all demolished materials would be considered RACMs and disposed of as asbestos waste.

The information provided herein suggests that DES and Blue Star conducted demolition and abatement procedures in Violation of Section 40 CFR 61.145(c)(1), “Failure to Remove RACM Prior to Demolition”. In addition, these activities did not follow procedures for asbestos abatement as clearly defined in the Project Manual. While these reasons do not ultimately absolve Lake Orion Community Schools for responsibility in these violations, LOCS suggests that the abatement and demolition contractors clearly did not follow required abatement and demolition procedures, as detailed in the bid documentation.

Lake Orion Community Schools is committed to conducting asbestos abatement, building demolition and renovation activities in a safe manner and in accordance with all applicable state and federal regulations.

If you have any questions regarding the above information, please contact me at (248) 814-1798.

Sincerely,

Wes Goodman
Executive Director of Operations
Lake Orion Community Schools