



ENFORCEMENT ORDER

Allegheny County Health Department

Air Quality Program

836 Fulton Street Pittsburgh, PA 15233

Phone: (412) 578-8103

Address of Alleged Violation: 304 Josephs Ln. Pittsburgh, PA 15237			
Name of Alleged Violator #1: Avonworth School District			
Address of Alleged Violator #1: 258 Josephs Ln. Pittsburgh, PA 15237			
Contact Person #1: Jeff Hadley	Title: Superintendent of Schools	Phone Number: 412-369-8738	Email: jhadley@avonworth.k12.pa.us
Name of Alleged Violator #2: Triangle Roofing Corporation			
Address of Alleged Violator #2: 351 Mt. Nebo Road, Pittsburgh, PA 15237			
Contact Person #2: Justin Fehl	Title: Principal	Phone Number: 412-369-9333	Email: Justin@triangleroofinginc.com

PART 1: DESCRIPTION OF INSPECTION(S)

On November 3, 2025, the Allegheny County Health Department (ACHD) received a complaint regarding renovations, including roofing work being performed on Avonworth High School (AHS).

On November 14, 2025, an ACHD representative contacted AHS to investigate the complaint. Dr. Jeff Hadley, Avonworth School District Superintendent, informed ACHD that a roof replacement was performed on AHS. ACHD requested the dates of the roof removal and replacement, as well as a copy of an Asbestos Hazard Emergency Response Act (AHERA) survey for AHS.

On November 18, 2025, Avonworth School District provided contact information for the contractor of the roof replacement project, Triangle Roofing Corporation. On November 25, 2025, ACHD contacted Triangle Roofing to request an asbestos survey, waste manifests, and square footage of material removed for the roof renovation conducted by Triangle Roofing Corporation. On November 26, 2025, Triangle Roofing Corporation provided the bid specification for the roofing project. The bid specification lists that, "The Contractor at all times shall observe, comply with, and post as required all Federal, State, and local laws, ordinances, and regulations in any manner affecting the conduct of the work applying to employees on the project, as well as all orders or decrees which have been or may be promulgated or enacted by any legal bodies or tribunals having authority or jurisdiction over the work, materials, employees, or Contract."

On November 26, 2025, an ACHD representative requested AHS's asbestos survey for the roofing project. Avonworth School District's representative stated the roofing contractor did not provide an asbestos survey.

As of the date of this order, a thorough pre-renovation asbestos survey of the building materials disturbed by the renovation project has not been provided to ACHD by Avonworth School District or Tringle Roofing Corporation as required by Article XXI § 2105.62.b, 40 CFR § 61.145(a).

Did the individual/company cooperate with ACHD personnel? If not, explain:	Yes
Inspection Date(s) 11-14-2025	Inspector Name(s) Owen Kulp/ Cali Conley

PART 2: YOU ARE IN VIOLATION OF THE FOLLOWING REGULATION(s):

1	Regulation Section Article XXI § 2105.62.b, 40 CFR § 61.145(a)	Regulation Requirement The owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation must thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos
	Description of Violation Prior to renovation, Avonworth School District and Triangle Roofing Corporation failed to perform and provide to ACHD a thorough pre-renovation asbestos survey of the building materials disturbed by the renovation project.	
	What You Must Do to Correct the Violation Provide an asbestos survey reflecting roofing material where the renovation occurred if conducted before the renovation and conduct a thorough asbestos survey prior to any future renovation.	

PART 3: YOU ARE HEREBY ORDERED AS FOLLOWS:

Immediately stop all work and/or cease operations at the following location(s):

You are hereby Ordered to correct the violation(s) listed in Part 2 within _____ days of the service of this Enforcement Order.

You are hereby Ordered to comply with the following requirements within 14 days of the service of this Enforcement Order:

Provide waste manifests for roofing material removed or replaced.

The Order(s) in this Part is enforceable upon issuance and any appeal shall not act as a stay. The Order(s) shall remain in effect until you are notified in writing by the Department. Please contact the ACHD Air Quality Program at (412) 578-8103 to arrange for a reinspection or to request that the Order(s) be rescinded.

Please be advised that failure to comply with this Order within the times specified herein is a violation of Article XXI giving rise to the remedies provided by Article XXI § 2109.02 including civil penalties of up to \$25,000 per violation per day.

PART 4: CIVIL PENALTY

For the violations listed in Part 2, you are hereby assessed a civil penalty of \$ 5,850.00. The determination of the civil penalty is attached as **Exhibit No. 1** and is incorporated as part of this Enforcement Order.

Please be aware that if the Department did not assess a civil penalty, the Department may issue a subsequent enforcement order in which a civil penalty is assessed.

You shall pay the civil penalty amount within thirty (30) days of receipt of this Order. Payment shall be made by corporate or certified check, or the like, made payable to the "Allegheny County Clean Air Fund", and sent to Air Quality Program Manager, Allegheny County Health Department, 836 Fulton Street, Pittsburgh, PA 15233.

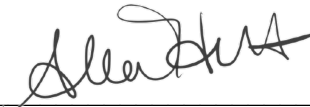
PART 5: REQUEST FOR ADMINISTRATIVE HEARING

Pursuant to Article XI, § 1104.A ("Hearings and Appeals"), and Article XXI § 2109.06.a.5, of the Allegheny County Health Department Rules and Regulations, you are notified that if you are aggrieved by this Order, a Notice of Appeal shall be filed no later than thirty (30) days after receipt of written notice or issuance of this Order. Such a Notice of Appeal shall be filed in the Office of the Director at 542 Fourth Avenue, Pittsburgh, PA 15219.

This Order is enforceable upon issuance and any appeal of this Order shall not act as a stay unless the Director of the ACHD so orders. In the absence of a timely appeal, the terms of this Order shall become final.

Please be aware that if you wish to appeal this Order and a civil penalty has been assessed under Part 4, you are required within 30 days of receipt of this Order to either forward the penalty amount to the ACHD for placement in an escrow account or post an appeal bond to the ACHD in the amount of the penalty. Failure to forward the money or the appeal bond at the time of the appeal shall result in a waiver of all legal rights to contest the violation or the amount of the civil penalty unless you allege financial inability to prepay the penalty or to post the appeal bond. If you allege financial inability to prepay or post a bond, then you have the burden to prove it. Please review the specific requirements for prepaying the penalty or posting the appeal bond found in Article XXI § 2109.06.a.2-3.

A copy of Article XXI and Article XI may be found at <https://www.alleghenycounty.us/Health-Department/Health-Department-Regulations.aspx>.



Air Quality Program Manager

3/9/2026

Date

EXHIBIT NO. 1

CIVIL PENALTY DETERMINATION AND CALCULATION

PURPOSE: The primary purpose for assessing civil penalties is to deter future violations not only at the specific facilities that are involved in the enforcement actions taken by the Department, but also at all the facilities within Allegheny County that are subject to the Article XXI regulations. In order to achieve the goal of deterrence, a civil penalty should remove any significant economic benefit resulting from noncompliance and include an amount beyond recovery of the economic benefit to reflect the seriousness of the violation.

CIVIL PENALTY FACTORS: The ACHD has determined the civil penalty to be in accordance with Article XXI, § 2109.06.b, reflecting relevant factors including, but not limited to: the nature, severity and frequency of the alleged violations; the maximum amount of civil and criminal penalties authorized by law; the willfulness of such violations; the impact of such violations on the public and the environment; the actions taken by the violator to minimize such violations and to prevent future violations; and the violator's compliance history.

$$\text{Civil Penalty} = (\text{Gravity Based Component} \times \text{Adjustment Factor}) + \text{Economic Benefit} + \text{Cost to the Department} + \text{Additional Deterrent Penalty}$$

CIVIL PENALTY FORMULA: The following calculation is used to assess the civil penalty:

Gravity Based Component: A gravity based component reflects the potential harm that the violation may have on the public or environment and the severity of the violation.

Adjustment Factor: The gravity based component may be adjusted for factors and circumstances unique to the violator. These adjustment factors include the violator's degree of cooperation with the ACHD during the investigation, the compliance history of the violator, the degree of willfulness that violator exhibited with regard to the violation, the size of the violator, and whether the violator is a Title V source or a Synthetic Minor source.

Economic Benefit: This component is a measure of the economic benefit gained by the violator as a result of noncompliance with the regulatory, statutory, or permit requirements.

Cost to the Department: Extra monetary costs for the investigation and preparation of the case, such as source sampling costs and laboratory costs, may be identified and added to the adjusted civil penalty.

Additional Deterrent Penalty: An additional deterrent penalty may be assessed if justified by the circumstances of the case.

CIVIL PENALTY CALCULATION

A. Gravity Based Component

Violation	Gravity Based Penalty	Violation Days	Total Gravity Penalty
Article XXI § 2105.62.b, 40 CFR § 61.145(a). Failure to perform asbestos survey prior to renovation	\$ 9,000.00	1	\$9,000.00
	\$		\$
	\$		\$
	\$		\$
Gravity Component Total			\$9,000.00

B. Adjustment Factors

	Factor	Adjustment Amount
Degree of Cooperation: Provided some information	0.1	\$ 900.00
Compliance History: No Enforcement Actions in last two years		\$
Degree of Willfulness: Failure to exercise due diligence		\$
Size of Violator: Governmental Entity	-0.45	-\$4,050.00
Title V source or a Synthetic Minor source:		\$
Adjustment Factors Total		-\$3,150.00

C. Other Adjustments

Economic Benefit:	\$	
Cost to the Department:	\$	
Additional Deterrent Penalty:	\$	
Other Adjustments Total		\$
TOTAL CIVIL PENALTY		\$5,850.00