

**COMMUNITY REDEVELOPMENT AGENCY  
AGENDA  
TUESDAY, MARCH 8, 2016  
4:45 P.M.**

1. Approval of March Financial Report *(Requires vote)*
2. Riverfront Redevelopment Team (RRT) Membership *(Requires vote)*
3. Bike Racks for Downtown Milton *(Requires vote)*
4. 2016 Be Local Advertising Agreement *(Requires vote)*
5. NESHAP Inspection Requirements on Properties on Pine and Elmira Streets – Cost of \$10,000 *(Requires vote)*
6. Other Business
7. Adjourn

**DOWNTOWN TRUST FUND**  
**FY 2016**  
**( Fund 102 )**

as of 03/07/2016

		<b>FY 2016</b>	<b>FY 2016</b>			
acct. #		<b>BUDGET</b>	<b>YTD</b>	<b>Balance</b>	<b>Description</b>	
<b>REVENUES</b>	338-10-00	O/S Rev from Local Units (SRC contrib)	\$ 39,666	\$ 39,665	\$ 1	Estimated tax billing
	338-10-01	O/S Rev from Local Units (CITY contrib)	\$ 21,067	\$ 21,067	\$ -	Estimated tax billing
	348-xx-xx	Promotional	\$ 34,800	\$ 9,054	\$ 25,746	Promotional Revenue
	361-10-00	Interest Income	\$ -	\$ 15	\$ -	Interest
	366-10-00	Misc. Donations	\$ -	\$ -	\$ -	Misc. Donations
	381-01-00	Transfer from General Fund	\$ 2,505	\$ -	\$ 2,505	Demo Pine St & Elmira St (from Planning Demo Line)
	389-90-01	Funds Forward FY 2015 Balance	\$ 77,470	\$ -	\$ 77,470	FY15 EOY (\$7,767est + BA \$69,703=\$77,470)
<b>REVENUE TOTALS</b>		<b>\$ 175,508</b>	<b>\$ 69,801</b>	<b>\$ 105,722</b>		

Dept. 552

<b>EXPENDITURES</b>	<b><u>5 K Race</u></b>					
	48-01	Promo-5K	\$ 17,000	\$ 4,483	\$ 12,517	Promo-5K
	<b>TOTAL 5 K</b>		<b>\$ 17,000</b>	<b>\$ 4,483</b>	<b>\$ 12,517</b>	
	<b><u>BANDS ON THE BLACKWATER</u></b>					
	48-02	Promo-Bands on Blackwater	\$ 19,000	\$ 6,584	\$ 12,416	Promo-Bands on Blackwater (14 Concerts)
	<b>TOTAL BANDS</b>		<b>\$ 19,000</b>	<b>\$ 6,584</b>	<b>\$ 12,416</b>	
	<b><u>MOVIE NIGHT</u></b>					
	48-03	Promo-Movie Night	\$ 850	\$ 845	\$ 5	Promo-Movie Night
	<b>TOTAL MOVIE NIGHT</b>		<b>\$ 850</b>	<b>\$ 845</b>	<b>\$ 5</b>	
	<b><u>SCRATCH ANKLE</u></b>					
	48-04	Promo-Scratch Ankle	\$ 2,000	\$ 938	\$ 1,062	Promo-Scratch Ankle
	<b>TOTAL SCRATCH ANKLE</b>		<b>\$ 2,000</b>	<b>\$ 938</b>	<b>\$ 1,062</b>	
	<b><u>OTHER EVENTS</u></b>					
	48-06	Promo-Other Events	\$ 3,500	\$ -	\$ 3,500	Promo-Other (Tough Mudder)
	<b>TOTAL OTHER EVENTS</b>		<b>\$ 3,500</b>	<b>\$ -</b>	<b>\$ 3,500</b>	
	<b>PROMO EXPENSE TOTALS</b>		<b>\$ 42,350</b>	<b>\$ 12,850</b>	<b>\$ 29,500</b>	
	<b><u>OTHER EXPENSES</u></b>					
	34-00	Other Contractual Services	\$ 13,000	\$ 8,500	\$ 4,500	Misc. \$1,500; Arborist \$2,000; Demo \$10,000
	43-00	Utility Services	\$ 4,000	\$ 1,218	\$ 2,782	Gulf Power / Willing St. power poles
	46-00	Repair & Maintenance	\$ 22,000	\$ 900	\$ 21,100	R&M
48-00	Promotional	\$ -	\$ -	\$ -	Advertisement	
49-00	Other Current Charges	\$ 4,000	\$ 3,443	\$ 557	Christmas lighting maintenance/Electrical Repair	
52-00	Operating Supplies	\$ 500	\$ 175	\$ 325	Misc.	
54-00	Dues & Subscriptions	\$ 370	\$ 370	\$ -	Dues & Subscriptions	
61-02	Easement-Sidewalk	\$ 1,200	\$ 1,200	\$ -	Easement-Sidewalk	
64-07	Misc. Equipment	\$ 9,500	\$ 9,495	\$ 5	1/2 cost of Movie Screen	
64-27	Downtown Project Expense	\$ 4,500	\$ -	\$ 4,500	Relandscaping of South Riverwalk	
82-09	Misc. Grants in Aid	\$ 4,000	\$ 1,500	\$ 2,500	Support for Special Events (SR Arts/Etc.)	
91-01	Transf to General Fund	\$ 1,456	\$ -	\$ 1,456	Kiosk at Russell Harbor Boat Ramp	
99-99	Contingencies (FY2016 Expenses)	\$ 68,632	\$ -	\$ 68,632	(\$77,470 FY15 actual)	
<b>OTHER EXPENSE TOTALS</b>		<b>\$ 133,158</b>	<b>\$ 26,801</b>	<b>\$ 106,357</b>		
<b>EXPENSE TOTALS</b>		<b>\$ 175,508</b>	<b>\$ 39,651</b>	<b>\$ 135,857</b>		

## RIVERFRONT REDEVELOPMENT TEAM (RRT)

Members:	9 voting members – One Elected Official, four owner/operators of commercial establishments within CRA’s I, II, and III. Two residents of the CRA areas. Two residents at large.
Meeting Date:	Upon call of the Chair
Member Term:	4 years ( <b>Note 2</b> )
Governing Document:	Resolution
Description of Duties:	The Riverfront Redevelopment Team is responsible for examining issues of importance to the Community Redevelopment Agency as assigned. The RRT is also responsible for insuring the development activity is consistent with the CRA plans and in keeping with the community’s character.

All records of the RRT shall be filed with the Planning and Development Department.

**Note:** Appointed members of City Boards and Committees are required by law to file a financial disclosure with the Florida Commission on Ethics. The reporting form and instructions will be sent to appointed members each year through the Santa Rosa County Supervisor of Elections office.

**Note 2:** (The first term of appointments are 2 year terms for 2 of the Owner/Operator seats and 1 of the CRA seats and 1 of the City Resident-at-Large seats in order to stagger the appointments)

**RIVERFRONT REDEVELOPMENT TEAM  
MEETS AS NEEDED**

<u>MEMBERS</u>	<u>TERM OF OFFICE</u>	<u>EXP. DATE</u>
----------------	-----------------------	------------------

**ELECTED OFFICIAL**

Continuous

**CRA I, II or III COMMERCIAL OWNER/OPERATOR**

Laura Spencer Coleman  
5228 Elmira Street  
626-8520 (w) 490-9406 (c)

4 years

Start:  
Exp:

Glen Hill  
6778 Margaret Street  
529-6199 (c)

4 years

Start:  
Exp:

Vacant

4 years

Vacant

**CRA I, II or III RESIDENTS**

Miller McCombs  
5081 Canal Street  
623-8669 (h)

4 years

Start:  
Exp:

Vacant

**CITY RESIDENTS AT-LARGE**

Vacant

Vacant



City of Milton, FL Bike Rack  
2/10/16





**DERO**  
A PLAYCORE Company

504 Malcolm Ave SE Suite 100,  
MINNEAPOLIS, MN, 55414

Tax Registration No 26-303-0026  
www.dero.com

(612) 359-0689 \* (888) 337-6729

Sales Representative - Natalia Mendez

Contact Name Randy Hoyt  
Contact Phone 850-377-4248

Est. Ship Date 3/24/2016  
Delivery terms FOB origin  
Payment terms CC

Delivery Contact  
Delivery Phone

## Quotation

Page 1 of 1  
Number QTE-00002089-1  
Date 2/11/2016  
Customer PO  
Reference  
Quote valid until 3/12/2016

**Sold to:**

Milton, FL - City of  
6731 Magnolia St.  
MILTON, FL 32570  
USA

**Ship to:**

Milton, FL - City of  
6731 Magnolia St.  
MILTON, FL 32570  
USA

Catalog No	Description	Ship date	Quantity	Unit	Net Unit	Amount
HOOP RACK-B	Surface Mount, Powder Coated, Black, 2000073-B	3/24/2016	8.00	EA	99.000	792.00
CUSTOM LOGO	Custom Laser cut plates welded to rack	3/24/2016	4.00	EA	200.000	800.00
WEDGE-.375-3.000	Wedge Anchor .375 x 3.000	3/24/2016	32.00	EA	0.000	0.00
3/8X1 BOND WSHR GV	3/8X1 BONDED WASHER GV	3/24/2016	32.00	EA	0.000	0.00

To place the order, verify that all the bill-to, ship-to, and order information is correct, sign and date where indicated, and email back to your sales representative, or to sales@dero.com. Once we receive a signed order form, we will e-mail you an order confirmation, so that you know that your order has been processed, and provide an estimated ship date.

This Ship Date is an estimate only. We will do everything possible to ship by or before that date but do not guarantee shipment by that date.

A 20% restocking fee will be assessed to all canceled orders.  
Quote is good for 30 days.

Customer agrees that installation area is suitable for drilling.  
Sales tax is estimated based on current tax rates. Final sales tax is subject to tax rates at the time of shipment.  
Payments can be made by credit card, pre-payment, or net 30 credit terms may be issued with credit approval.

THIS SIGNED ORDER FORM IS ACCEPTED AS A BINDING PURCHASE

Customer please specify desired ship date: \_\_\_\_\_

Signature & Date \_\_\_\_\_

- Builds Two (2) Bike Racks  
holding Six (6) Bikes Per Rack

Sales Subtotals	Freight	Other Charges	Sales Tax
1,592.00	219.00	0.00	0.00

<b>TOTAL</b>	<b>USD</b>	<b>\$1,811.00</b>
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# HOOP RACK



## Simple Security

The Hoop Rack is a proven design that provides high security and easy bike parking. The Hoop Rack uses thick pipe construction and the full radius of the bend makes the Hoop an attractive and functional bike rack. This bike rack can also be put on rails for mobility and is popular in bike corrals.



**DERO**  
A PLAYCORE Company

# HOOP RACK

## YOUR LOGO HERE

Customize the Hoop Rack and brand your bike parking



## FINISH OPTIONS

Galvanized



Stainless



PVC Dip



Powder Coat



Thermoplastic



## MOUNT OPTIONS

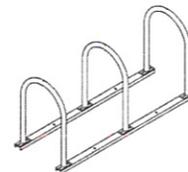
Surface



In-Ground



Rail



[www.dero.com](http://www.dero.com) | 1-888-337-6729

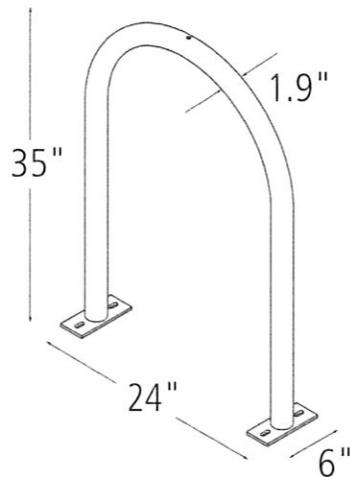


**DERO**  
A PLAYCORE Company



# HOOP RACK

## Specifications and Space Use



**Product** Dero Hoop Rack  
As manufactured by Dero Bike Racks

**Capacity** 2 Bikes

**Materials** 1.5" schedule 40 pipe (1.9" OD)



**Finishes**

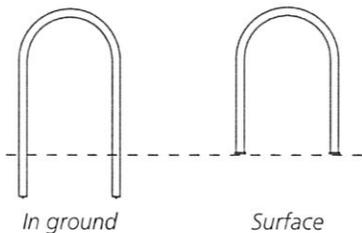


An after fabrication hot dipped galvanized finish is our standard option. 250 TGIC powder coat colors, thermoplastic coating, PVC dip, and stainless steel finishes are also available as alternate options.

Our powder coat finish assures a high level of adhesion and durability by following these steps:

1. Sandblast
2. Epoxy primer electrostatically applied
3. Final thick TGIC polyester powder coat

Stainless Steel: 304 grade stainless steel material finished in either a high polished shine or a satin finish.



**Installation Methods**



**In ground mount** is embedded into concrete base. Specify in ground mount for this option.

**Foot Mount** has two 2.5"x6"x.25" feet with two anchors per foot. Specify foot mount for this option.

**Rail Mounted Hoops** are bolted to two parallel rails which can be left freestanding or anchored to the ground. Rails are heavy duty 3"x1.4"x3/16" thick galvanized mounting rails. Specify rail mount for this option.



Rail (freestanding)

**Space Use and Setbacks**



**Wall Setbacks:**

For racks set parallel to a wall:

Minimum: 24"

Recommended: 36"

**For racks set perpendicular to a wall:**

Minimum: 28"

Recommended: 42"

**Distance Between Racks:**

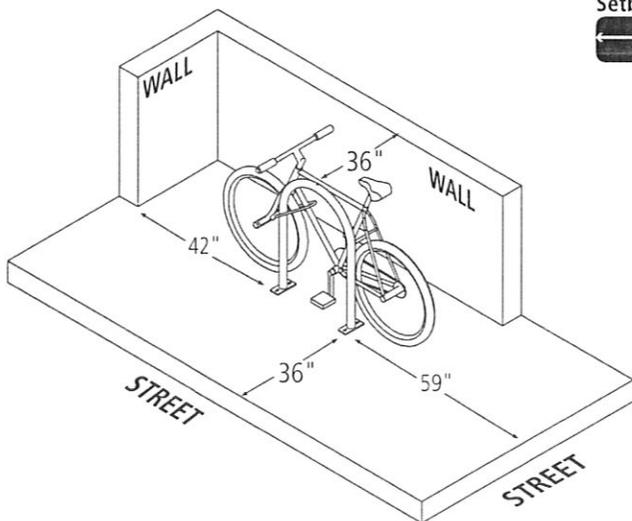
Minimum: 24"

Recommended: 36"

**Street Setbacks:**

Minimum: 24"

Recommended: 36"



DERO



BIKE RACKS



www.dero.com



1-800-298-4915



## 2016 Be Local Advertising Agreement Addendum

Advertiser Name: \_\_\_\_\_ Account Number: \_\_\_\_\_

Business Name: \_\_\_\_\_

Web Address: \_\_\_\_\_

Contact Name: \_\_\_\_\_ Contact Title: \_\_\_\_\_

Email Address: \_\_\_\_\_ Contact Phone: \_\_\_\_\_

The Advertiser agrees to the following Be Local small business program (circle one):



\$699 / monthly investment

Pensacola News Journal Newspaper  
2 Ads any Weekday + 1 Sunday Ad  
(2x3 full color + every week)

PNJ.com  
30,000 Display Ads (monthly)

50 Be Local Loyalty Cards

10,000 mobile impressions  
+ \$119/MO.



\$999 / monthly investment

Pensacola News Journal Newspaper  
2 Ads any Weekday + 1 Sunday Ad  
(2x4 full color + every week)

PNJ.com  
44,000 Display Ads (monthly)

100 Be Local Loyalty Cards



\$1,299 / monthly investment

Pensacola News Journal Newspaper  
2 Ads any Weekday + 1 Sunday Ad  
(2x5 full color + every week)

PNJ.com  
57,000 Display Ads (monthly)

150 Be Local Loyalty Cards

Partnership in program requires 12 month commitment.

Pensacola News Journal:

Advertiser:

Account Rep

Date:

Authorized Signature

Date:

Sales Rep Name / #

Printed Name

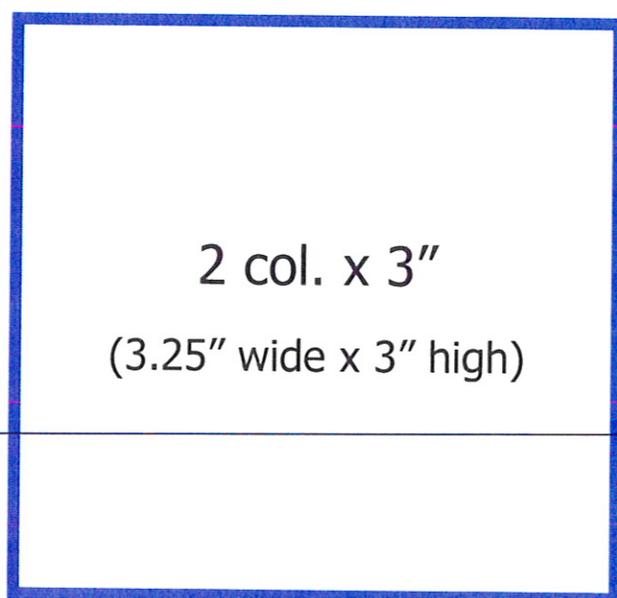
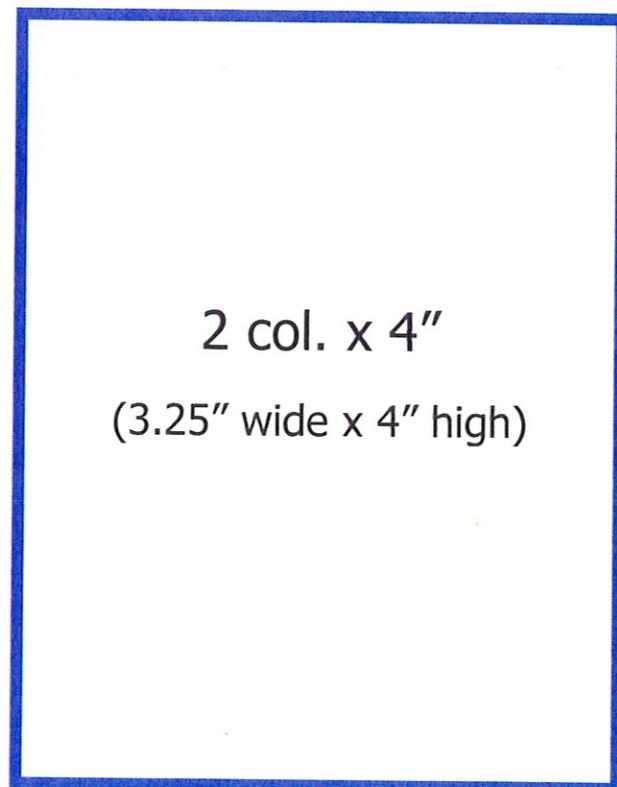
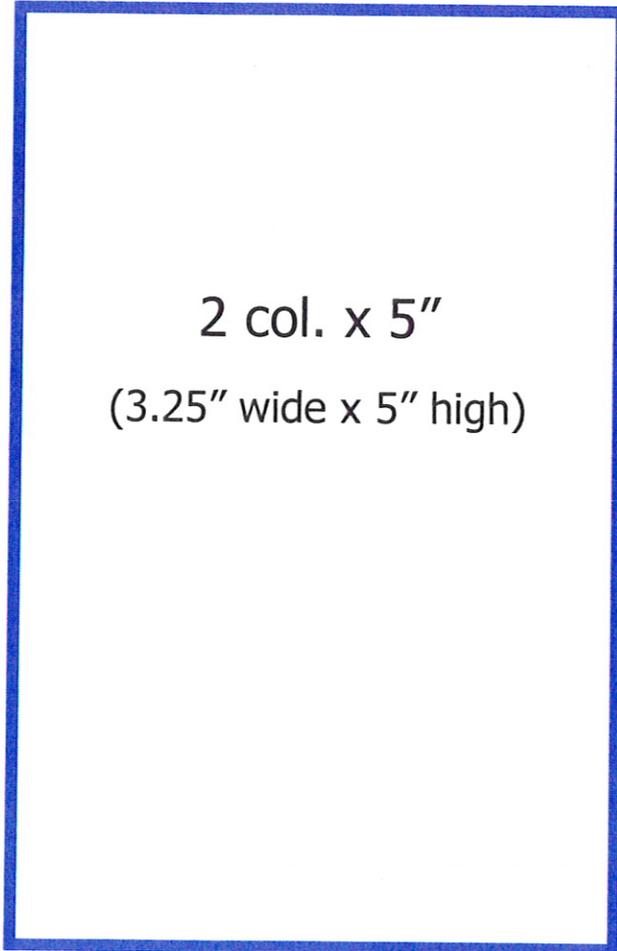
Sales Manager

Date:

Title



Ad Size Examples:



# By the Numbers

**JANUARY 2016**

**Overall PNJ Pageviews: 8,274,142**

## Desktop Page Views:

- Total Page Views: **4,200,435**
- Unique Viewers: **370,627**
- Home Page Views: **981,058**

### The Average pnj.com Visitor ...

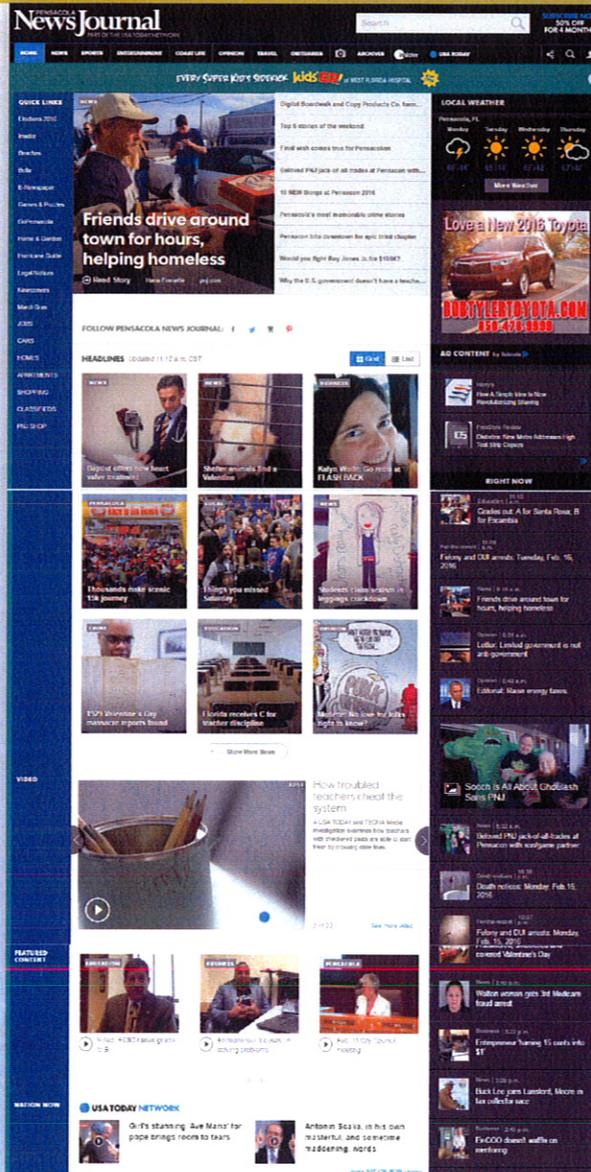
Spends **11.25** minutes on the site and views **11.33** pages.

## Section Page Views:

- Photo Galleries: **1,682,166**
- News: **931,617**
- Sports: **105,539**
- Obituaries: **150,320**
- Entertainment: **1,354,178**

## Video:

- Video Plays: **85,080**
- Minutes Watched: **87,297**



## e-Newspaper:

- Page Views: **777,515**
- Unique Viewers: **5,425**

## pnj.com Subscribers:

- Top 5 Newsletter: **17,678**
- Twitter Followers: **23,400**
- Facebook Likes: **46,417**

## Mobile Page Views:

- Total Mobile Views: **4,073,707**
- Unique Viewers: **370,627**
- m.pnj.com: **2,715,783**
- iPhone App: **417,335**
- Android App: **236,259**
- Tablet Edition: **704,330**



## Audience-based sites:

	Page Views	Facebook Likes	Twitter Followers
<b>gopensacola.com</b> Where Entertainment Starts	16,299	6,839	4,889
<b>Bella magazine.com</b>	3,549	3,360	1,405



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

RECEIVED

MAR 02 2010

BUREAU OF AIR REGULATION

Federal Express – Overnight Delivery

Sheila E. Schneider, Coordinator  
State Enforcement and Asbestos Program  
Florida Department of Environmental Protection  
Bureau of Air Regulation  
2600 Blair Stone Road, MS 5505  
Tallahassee, Florida 32399-2400

Dear Ms. Schneider:

On behalf of Duval County and the City of Jacksonville, Florida, you requested that the Environmental Protection Agency (EPA) provide you with a determination regarding the applicability of the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), contained in 40 Code of Federal Regulations Part 61, Subpart M, to municipal code enforcement demolitions. These ordered demolitions of nuisance homes are often published for contractor bids in one bid package. Multiple contractors can then bid on the various residential properties that they wish to demolish. The municipality then selects one or more contractors to perform the demolitions.

It is EPA's position that demolitions of individual residential buildings are regulated by the Asbestos NESHAP if they are either part of the same project or if they are on the same site under the control of the same owner or operator. In the scenario that you provided, the homes, while not necessarily located on the same site, are part of the same project because they are included in the same contractor bid document. Please find enclosed a memorandum dated July 3, 2008, which specifically states, "Demolitions planned at the same time or that are part of the same planning or scheduling period are considered part of the same project. For municipalities, the scheduling or planning is often done on a fiscal or calendar year or the term of the contract." Since these homes are part of the same project, all of the applicable requirements of the Asbestos NESHAP apply.

For the purpose of Asbestos NESHAP applicability, it does not matter whether the municipality takes ownership of the individual houses. All owners or operators of a demolition or renovation activity are responsible for complying with the requirements of the Asbestos NESHAP. The "owner or operator of a demolition or renovation activity" is defined in the Asbestos NESHAP as "any person who owns, leases, operates, controls, or supervises the facility being demolished or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both." The municipality itself meets this definition since it is controlling the demolitions by its hiring of the demolition contractors. The contractors meet this definition since they operate, control, and supervise the demolition operation.

Under the Asbestos NESHAP, all of the houses are required to be thoroughly inspected for the presence of asbestos. If threshold amounts of regulated asbestos-containing material (RACM) are present, such RACM will need to be removed in accordance with all of the Asbestos NESHAP requirements prior to demolition. The Florida Department of Environmental Protection (FDEP) must be provided written notice 10 days prior to such removal in accordance with the Asbestos NESHAP and 40 C.F.R. § 61.145(b). The cumulative amount of all RACM present in all of the houses must be combined when determining if thresholds have been met. Please note that regardless of whether any asbestos is present, the owner and/or operator must still provide written notice to FDEP 10 days prior to demolition.

If you have any question regarding this applicability determination, please contact Pamela McIlvaine of my staff at (404) 562-9197.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol G. Zemberger".

Kenneth R. Lapierre, Acting Director  
Air, Pesticides and Toxics  
Management Division

Enclosure



http://cfpub.epa.gov/adl/index.cfm?CFID=50338196&CFTOKEN=17988111&jsessionid=4e302672746072d4a8a52a37f5a3a4846327&requesttimeout=180  
 Last updated on Thursday, October 06, 2011

Compliance Monitoring

You are here: [EPA Home](#) [Compliance and Enforcement](#) [Compliance](#) [Compliance Monitoring](#) [Statutory Programs](#) [CAA](#) [Search ADI Database](#)

**Search Applicability Determination Index**

Selected Determinations

Click the "Control Number" link to view a determination. To download determinations on this page, check the corresponding box or boxes and click the button labeled "Download Checked Determinations on Page". To select (or de-select) all the boxes check the box in the header row. To sort the records that are displayed on the page, click the column header.

[Download Checked Determinations on Page](#)

Display 25 < Prev Page 1 of 2 Next >

Displaying 1- 25 of 39 results

<input type="checkbox"/>	Control #	Title	Category	Date	Author	Office
<input checked="" type="checkbox"/>	<a href="#">A110001</a>	The applicability of the asbestos NESHAP, Subpart M, to municipalities that	Asbestos	12/22/2010	Duffy, Richard F.	CAMPD
<input type="checkbox"/>	<a href="#">A090003</a>	Residential Structures Demolished by Municipalities for Public Safety	Asbestos	07/03/2008	Gigliello, Ken	CAMPD
<input type="checkbox"/>	<a href="#">A070002</a>	Residential Homes Demolished for Highway Expansion	Asbestos	02/16/2006	Alushin, Michael	CAMPD
<input type="checkbox"/>	<a href="#">A060001</a>	Demolition under Control of Same Owner or Operator	Asbestos	02/16/2006	Alushin, Michael	HQ
<input type="checkbox"/>	<a href="#">A050001</a>	Demolition of Residential Trailer Homes	Asbestos	06/23/2005	Michael S. Alushin	CAMPD
<input type="checkbox"/>	<a href="#">A030001</a>	Abandoned Underground Lines Wrapped in Friable Asbestos	Asbestos	03/06/2003	George Czerniak	Region 5
<input type="checkbox"/>	<a href="#">A020001</a>	Moving Structures	Asbestos	08/30/2002	George Czerniak	Region 5
<input type="checkbox"/>	<a href="#">A010002</a>	State Authority Regarding Single-Family House with Asbestos	Asbestos	04/30/2001	Michael Alushin	OECA
<input type="checkbox"/>	<a href="#">A010001</a>	Single Family House with Asbestos Containing Floor Tile	Asbestos	03/09/2001	Michael Alushin	OECA
<input type="checkbox"/>	<a href="#">A980002</a>	Inactive Landfill Requirements	Asbestos	11/05/1998	DeVillars, John	Region 1
<input type="checkbox"/>	<a href="#">A970008</a>	Residential Exemption	Asbestos	09/04/1997	Spink, Marcia L.	Region 3
<input type="checkbox"/>	<a href="#">A970002</a>	Various Recycling Issues	Asbestos	01/09/1997	Rasnic, John	METD
<input type="checkbox"/>	<a href="#">A960035</a>	Single Family Dwelling Work by Non-profits	Asbestos	01/01/1997	Rasnic, John	METD
<input type="checkbox"/>	<a href="#">A970005</a>	Small Projects	Asbestos	07/22/1996	Goldman, Lynn	METD
<input type="checkbox"/>	<a href="#">A960022</a>	Residential Buildings	Asbestos	06/11/1996	Rasnic, John	METD
<input type="checkbox"/>	<a href="#">A960030</a>	Residential Buildings	Asbestos	11/10/1995	Herman, Steven	OECA
<input type="checkbox"/>	<a href="#">A960033</a>	Demolition by Municipalities	Asbestos	11/01/1995	Herman, Steven	OECA
<input type="checkbox"/>	<a href="#">A960021</a>	Warning Signs	Asbestos	08/28/1995	Rasnic, John	METD
<input type="checkbox"/>	<a href="#">A960023</a>	Boarding House	Asbestos	01/25/1995	Rasnic, John	METD
<input type="checkbox"/>	<a href="#">A960031</a>	Practice Fire Burns	Asbestos	04/19/1994	Ripp, Tom	SSCD
<input type="checkbox"/>	<a href="#">A960034</a>	Landfill Activities	Asbestos	12/16/1993	Rasnic, John	SSCD
<input type="checkbox"/>	<a href="#">A930028</a>	Municipal Demo. of Res. Dwellings	Asbestos	07/15/1993		SSCD
<input type="checkbox"/>	<a href="#">A930024</a>	Residential Structure	Asbestos	02/03/1993	Rasnic, John B.	SSCD
<input type="checkbox"/>	<a href="#">A930007</a>	Residential Dwellings for Fire Training	Asbestos	12/03/1992	Seitz, John S.	OAQPS
<input type="checkbox"/>	<a href="#">A930013</a>	Residential Dwellings for Fire Training	Asbestos	12/03/1992	Seitz, John S.	OAQPS

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, OH 43216-1049

Dear Mr. Hodanbosi:

This letter is in response to your letter dated November 1, 2010 in which you asked how the asbestos National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 C.F.R. Part 61, Subpart M applies to municipalities that are demolishing/renovating multiple residential structures as part of an "urban renewal" project. In addition, you requested that the Agency provide a definition or clearer understanding of "planning period" as it applies to your situation.

The first issue deals with a governmental entity that is considering the demolition/renovation of multiple homes within its jurisdiction during a specific planning period, i.e., calendar year, fiscal year, grant project period, etc., as part of an "urban renewal" project. The funds for this "urban project" may come from a single source or could come from several funding sources.

On November 20, 1990, EPA published a revision to the asbestos NESHAP regulation. (See 55 FR 48406). The purpose of the revision was "to enhance enforcement and promote compliance with the current standard without altering the stringency of existing controls." The revisions revised and added several definitions in order to clarify the requirements of the NESHAP. The preamble accompanying the revisions contained clarifying information. In particular, the 1990 revisions clarified the definition of "facility" to include, in part:

Any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units) . (See 40 CFR 61.141 – Facility)

In the preamble to the 1990 amendments of the asbestos NESHAP, EPA stated that it does not consider residential structures that are demolished as part of a commercial or public project to be exempt from this rule. For example, the demolition of one or more houses as part of an urban renewal project, a highway construction project, or a project to develop a shopping mall, industrial facility, or other private development would be subject to the asbestos NESHAP. It is EPA's position that demolitions/renovations of individual residential buildings are regulated if they are being demolished/renovated as part of a larger project or if the residences meet the definition of an installation, e.g., more than one residence on the same site or one residence being demolished along with commercial buildings on the same site under the control of the same owner or operator.

In your scenario, residential homes within the governmental jurisdiction, i.e., city, county, village or township that are or will be part of the "urban project" are subject to the thorough inspection requirement of the asbestos NESHAP. The governmental unit is considered the operator of the demolition/renovation operation since it is managing the contractor(s) that will be implementing the demolition/renovation operation of the "urban renewal" project. (See 40 CFR 61.141 – Definitions - Owner or Operator of a Demolition or Renovation Operation). If the "urban project" is a demolition operation, a thorough inspection is required and a Notification must be submitted to the appropriate state or local air program agency or to the regional EPA office, whether there is asbestos or not. If it is a renovation operation, a thorough inspection is required and a Notification must be submitted only if the amount of asbestos-containing material that is friable or will be made friable during the renovation operation exceeds the regulatory threshold. If the total amount added together from every house that is part of the "urban project" exceeds 260 linear feet on pipe or 160 square feet from any facility component, then the "urban project" is regulated under the asbestos NESHAP, and the demolition operations are subject to the asbestos emission control requirements (61.145(c)) and waste disposal requirements (61.150).

As to which homes comprise the project, the government entity should know with some certainty which homes will be part of the demolition project before it begins. There may be instances, depending upon the circumstances, where additional homes may be added or subtracted from the final list of homes scheduled for demolition under the project. In the end, all homes scheduled for demolition under the project are subject to the asbestos NESHAP demolition requirements. Notwithstanding this long standing interpretation, however, there may be instances where the "isolated" single family home exemption still applies. The 1995 Clarification of Intent (60 FR 38725), for instance, describes that an isolated, single family home (including a residential structure with four dwelling units or less) is not subject to the asbestos NESHAP regulation. There may be an instance where a municipality is demolishing a single family home which is not part of a larger project, and which does not meet the definition of an installation, in which case the demolition of the home would not be subject to the asbestos NESHAP.

The second issue you raise deals with the meaning of the phrase "planning period" as it applies to the situation described above. In this regard, you specifically request a definition for or a clearer understanding of that phrase. The phrase "planning period" is not defined in the asbestos NESHAP. The Agency, however, did provide guidance in a 1995 Clarification of Intent, 60 FR 38725. At Footnote 1, the Agency stated that demolition operations planned at the same time or as part of the same planning period or scheduling period are considered to be part of the same project, and that in the case of municipalities, a planning or scheduling period is often a fiscal or calendar year or the term of a contract.<sup>1</sup> The fact that demolitions might be spread out over multiple fiscal or calendar years or even multiple contracts, however, does not necessarily mean they are not occurring as part of the same planning period. It is not unusual for large scale demolition projects to take place in phases that may include more than one fiscal year, calendar year, or contract. Such demolitions could still be occurring as part of the same project or plan and the planning period for such project or plan and the associated demolitions could extend over several years and involve multiple contracts. Depending on the specific facts in any given situation, such situations could very well be subject to the asbestos NESHAP.

I appreciate the opportunity to respond your inquiry. This letter has been reviewed by the Office of General Counsel, the Office of Air Quality Planning and Standards and the Office of Civil Enforcement, Air Enforcement Division.

Sincerely,

Richard F. Duffy, Acting Director  
Compliance Assessment and Media Programs Division  
Office of Compliance

cc: Air and Radiation Division, US EPA Region 5  
Superfund Division, Community and Land Revitalization Branch, US EPA Region 5

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<sup>1</sup> A demolition/renovation operation that is broken into smaller operations so that the total amount of regulated asbestos-containing material is less than 260 linear feet/160 square feet is not allowed under the asbestos NESHAP regulation. This would be viewed as Circumvention – 40 C.F.R. §61.19.



This memorandum responds to your request regarding the March 14, 2008 letter from the Arkansas Department of Environmental Quality (ADEQ). Their letter requests EPA's position on the applicability of the National Emission Standard for Asbestos (asbestos NESHAP), 40 CFR Part 61, Subpart M, to city-ordered demolitions of multiple residential buildings for reasons of public health, welfare, and safety. ADEQ also asked EPA to inform them if EPA did not agree with their conclusion that: 1) EPA's July 28, 1995 Asbestos NESHAP Clarification of Intent (1995 Clarification, which was published in the Federal Register (60 FR 38725), and July 15, 1993 Applicability Determination (control #930828) issued by the Stationary Source Compliance Division in OAQPS, our predecessor organization, are in conflict, and 2) the 1995 Clarification is the controlling document when analyzing the applicability of the asbestos NESHAP to such demolitions.

EPA does not agree that the documents are inconsistent based on our reading of the 1990 regulation, the 1993 Applicability Determination, which relies heavily on the regulation's preamble language, and the 1995 Clarification. In fact, based on our reading of the aforementioned documents, it is EPA's position that demolitions of individual residential buildings are regulated if they are being demolished as part of a larger project<sup>1</sup> (or if the residences meet the definition of an installation, e.g., more than one residence on the same site or one residence being demolished along with commercial buildings on the same site under the control of the same owner or operator).

Accordingly where numerous residential buildings, e.g., 20 to 100 homes as discussed in the incoming ADEQ letter, are being demolished as part of one project (for reasons of public health, welfare, and safety in the case of ADEQ), it is EPA's position that such demolitions are subject to the asbestos NESHAP requirements.

In addition, we have one comment on the two draft ADEQ Clarification Memoranda included as attachments in the March 14 letter from ADEQ. The draft designated as 2008-01 contains the following question: "Does the demolition/renovation involve more than one small residential building within 1500 feet of each other by the same owner/operator (or owner or operator under common control) as part of the same project?" This appears to be an effort to define a single "site" as that term is used within the definition of installation. As noted in the 1995 Clarification, however, the term "site" is not defined in the asbestos NESHAP and EPA has never provided specific boundaries for that term under the asbestos NESHAP. Accordingly, the use of 1500 feet as the criteria to define a site is not consistent with the Federal asbestos NESHAP regulation. Multiple residential buildings being demolished on the same site by an owner or operator would be subject to the asbestos NESHAP, regardless of their proximity to one another.

If you have questions, please call me at (202) 564-7047. The Office of Regulatory Enforcement, the Office of General Counsel and the Office of Air Quality Planning and Standards have reviewed this memorandum.

cc: Susan Fairchild, OAQPS  
Randy Hill, OCE  
Pam Mazakas, OCE  
Tahani Rivers, OCE  
Chris Kaczmarek, OGC  
Phyllis Flaherty, OC

<sup>1</sup> Demolitions planned at the same time or that are part of the same planning or scheduling period are considered part of the same project. For municipalities, the scheduling or planning is often done on a fiscal or calendar year or the term of the contract. [See 60 FR 38725, FN 1.]



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: A070002**

**Category:** Asbestos  
**EPA Office:** CAMPD  
**Date:** 02/16/2006  
**Title:** Residential Homes Demolished for Highway Expansion  
**Recipient:** Kavanaugh, James  
**Author:** Alushin, Michael  
**Comments:**

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Part 61, M                      Asbestos

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**References:**                      61.141  
   55 FR 48412  
   60 FR 38725

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**Abstract:**

Q: Could EPA clarify to the Air Pollution Control Program in Jefferson City, Missouri whether single family residences are subject to the Asbestos NESHAP, 40 CFR part 61, subpart M, if they are being demolished as part of a highway expansion?

A: EPA explains that a group of residential buildings under the control of the same owner or operator is considered an installation according to the definition of "installation," and thus is covered by the asbestos NESHAP. As an example, several houses located on a highway right-of-way that are all demolished as part of the same highway project would be considered an "installation," even when the houses are not proximate to each other. In this example, the houses are under the control of the same owner or operator, that is, the highway agency responsible for the highway project.

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**Letter:**

Mr. James L. Kavanaugh  
Interim Director  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, MO 65102-0176

Dear Mr. Kavanaugh:

This regulatory determination is in response to your letter of November 4, 2005 in which you describe a discrepancy in a previous applicability determination concerning residential structures targeted for demolition in connection with a highway expansion project. Your request seeks clarification as it applies to the asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), 40 C.F.R. Part 61, subpart M.

In the November 20, 1990 Final Rule revising the asbestos NESHAP (55 FR 48412), EPA addressed the scope of the term "installation" which was being added to the asbestos NESHAP. The Agency stated:

a group of residential buildings under the control of the same owner or operator is considered an installation according to the definition of "installation" and is, therefore, covered by the rule. As an example, several houses located on highway right-of-way that are all demolished as part of the same highway project would be considered an "installation," even when the houses are not proximate to each other. In this example, the houses are under the control of the same owner or operator, i.e., the highway agency responsible for the highway project.

In the July 28, 1995 Federal Register (60 FR 38725), EPA issued a Notice of Clarification addressing the scope of residential home exemption. EPA once again clarified that demolitions of residential buildings under the control of the same owner or operator as part of a larger demolition project (i.e., in connection with the construction of public facilities such as highways, sports arenas, or shopping malls) are not excluded from the asbestos NESHAP. (60 FR at 38726.

I appreciate the opportunity to clarify a past applicability determination discrepancy. The Office of Civil Enforcement, the Office of Air Quality Planning and Standards, and the Office of General Counsel have reviewed this determination.

Very truly yours,

Michael S. Alushin  
Compliance Assessment and Media Programs Division Office of Compliance

cc: Charlie Garlow, OCE  
Susan Fairchild, OAQPS  
Chris Kaczmarek, OGC



any building or structure or any group of buildings or structures at a single demolition or renovation site that are under the control of the same owner or operator (or owner or operator under common control).

Furthermore, in the Preamble of the revised asbestos NESHAP regulations published November 20, 1990 (55 FR 48412), the Agency responded to a question regarding whether a group of residential buildings at one location being demolished by one developer should be subject to the asbestos NESHAP regulations. The Agency responded:

a group of residential buildings under the control of the same owner or operator is considered an installation according to the definition of "installation" and is, therefore, covered by the rule. As an example, several houses located on highway right-of-way that are all demolished as part of the same highway project would be considered an "installation," even when the houses are not proximate to each other. In this example, the houses are under the control of the same owner or operator, i.e., the highway agency responsible for the highway project.

In the July 28, 1995 Federal Register (60 FR 38725), EPA issued a Notice of Clarification addressing the scope of the residential home exemption. EPA once again clarified that demolitions of residential buildings under the control of the same owner or operator as part of a larger demolition project (i.e., in connection with the construction of public facilities such as highways, sports arenas, or shopping malls) are not excluded from the asbestos NESHAP. (60 FR 38726).

With respect to your issue, residential structures demolished as part of a larger project are subject to the asbestos NESHAP if the demolition of the residential structures is under the control of the same owner or operator and is part of the same project. In the case of a highway expansion, one entity, e.g., the state highway department and/or the demolition contractor owns or has control over the residential structures to be demolished. These residential structures are subject to the asbestos NESHAP regulations. Please note, if one residential structure is the only structure demolished during the project, the one residential structure is not subject to the asbestos NESHAP regulations. [60 FR 38726, See EPA Interpretation]. At a minimum, the residential structures are subject to the "thorough inspection" and notification requirements under the Applicability section - SS 61.145. If the amount of regulated asbestos-containing material found in all the residential structures subject to the demolition project exceeds the regulatory threshold, then all the residential structures are subject to the full regulatory authority of the asbestos NESHAP.

The Office of Civil Enforcement, the Office of Air Quality Planning and Standards, the Office of General Counsel and Region 7 have reviewed this determination.

Very truly yours,

Michael S. Alushin  
Compliance Assessment and Media Programs Division Office of Compliance

cc: Charlie Garlow, OCE  
Susan Fairchild, OAQPS  
Chris Kaczmarek, OGC  
Larry Hacker, Region 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUL 3 2008

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Applicability of the Asbestos NESHAP to Demolitions of Residential Structures by Municipalities Due to Public Safety Concerns – Letter from ADEQ

FROM: Ken Gigliello, Acting Director *Ken Gigliello*  
Compliance Assessment and Media Programs Division  
Office of Compliance

TO: John Blevins, Director  
Compliance Assurance and Enforcement Division  
Region VI

This memorandum responds to your request regarding the March 14, 2008 letter from the Arkansas Department of Environmental Quality (ADEQ). Their letter requests EPA's position on the applicability of the National Emission Standard for Asbestos (asbestos NESHAP), 40 CFR Part 61, Subpart M, to city-ordered demolitions of multiple residential buildings for reasons of public health, welfare, and safety. ADEQ also asked EPA to inform them if EPA did not agree with their conclusion that: 1) EPA's July 28, 1995 Asbestos NESHAP Clarification of Intent (1995 Clarification, which was published in the Federal Register (60 FR 38725), and July 15, 1993 Applicability Determination (control #930828) issued by the Stationary Source Compliance Division in OAQPS, our predecessor organization, are in conflict, and 2) the 1995 Clarification is the controlling document when analyzing the applicability of the asbestos NESHAP to such demolitions.

EPA does not agree that the documents are inconsistent based on our reading of the 1990 regulation, the 1993 Applicability Determination, which relies heavily on the regulation's preamble language, and the 1995 Clarification. In fact, based on our reading of the aforementioned documents, it is EPA's position that demolitions of individual residential buildings are regulated if they are being demolished as part of a larger project<sup>1</sup> or if the residences meet the definition of an installation, e.g., more than one residence on the same site or one residence being demolished along with commercial buildings on the same site under the control of the same owner or operator.

<sup>1</sup> Demolitions planned at the same time or that are part of the same planning or scheduling period are considered part of the same project. For municipalities, the scheduling or planning is often done on a fiscal or calendar year or the term of the contract. [See 60 FR 38725, FN 1.]

Accordingly where numerous residential buildings, e.g., 20 to 100 homes as discussed in the incoming ADEQ letter, are being demolished as part of one project (for reasons of public health, welfare, and safety in the case of ADEQ), it is EPA's position that such demolitions are subject to the asbestos NESHAP requirements.

In addition, we have one comment on the two draft ADEQ Clarification Memoranda included as attachments in the March 14 letter from ADEQ. The draft designated as 2008-01 contains the following question: "Does the demolition/renovation involve more than one small residential building within 1500 feet of each other by the same owner/operator (or owner or operator under common control) as part of the same project?" This appears to be an effort to define a single "site" as that term is used within the definition of installation. As noted in the 1995 Clarification, however, the term "site" is not defined in the asbestos NESHAP and EPA has never provided specific boundaries for that term under the asbestos NESHAP. Accordingly, the use of 1500 feet as the criteria to define a site is not consistent with the Federal asbestos NESHAP regulation. Multiple residential buildings being demolished on the same site by an owner or operator would be subject to the asbestos NESHAP, regardless of their proximity to one another.

If you have questions, please call me at (202) 564-7047. The Office of Regulatory Enforcement, the Office of General Counsel and the Office of Air Quality Planning and Standards have reviewed this memorandum.

cc: Susan Fairchild, OAQPS  
Randy Hill, OC  
Pam Mazakas, OC  
Tahani Rivers, OCE  
Chris Kaczmarek, OGC  
Phyllis Flaherty, OC



any building or structure or any group of buildings or structures at a single demolition or renovation site that are under the control of the same owner or operator (or owner or operator under common control).

Furthermore, in the Preamble of the revised asbestos NESHAP regulations published November 20, 1990 (55 FR 48412), the Agency responded to a question regarding whether a group of residential buildings at one location being demolished by one developer should be subject to the asbestos NESHAP regulations. The Agency responded:

a group of residential buildings under the control of the same owner or operator is considered an installation according to the definition of "installation" and is, therefore, covered by the rule. As an example, several houses located on highway right-of-way that are all demolished as part of the same highway project would be considered an "installation," even when the houses are not proximate to each other. In this example, the houses are under the control of the same owner or operator, i.e., the highway agency responsible for the highway project.

In the July 28, 1995 Federal Register (60 FR 38725), EPA issued a Notice of Clarification addressing the scope of the residential home exemption. EPA once again clarified that demolitions of residential buildings under the control of the same owner or operator as part of a larger demolition project (i.e., in connection with the construction of public facilities such as highways, sports arenas, or shopping malls) are not excluded from the asbestos NESHAP. (60 FR 38726).

With respect to your issue, residential structures demolished as part of a larger project are subject to the asbestos NESHAP if the demolition of the residential structures is under the control of the same owner or operator and is part of the same project. In the case of a highway expansion, one entity, e.g., the state highway department and/or the demolition contractor owns or has control over the residential structures to be demolished. These residential structures are subject to the asbestos NESHAP regulations. Please note, if one residential structure is the only structure demolished during the project, the one residential structure is not subject to the asbestos NESHAP regulations. [60 FR 38726, See EPA Interpretation]. At a minimum, the residential structures are subject to the "thorough inspection" and notification requirements under the Applicability section - SS 61.145. If the amount of regulated asbestos-containing material found in all the residential structures subject to the demolition project exceeds the regulatory threshold, then all the residential structures are subject to the full regulatory authority of the asbestos NESHAP.

The Office of Civil Enforcement, the Office of Air Quality Planning and Standards, the Office of General Counsel and Region 7 have reviewed this determination.

Very truly yours,

Michael S. Alushin  
Compliance Assessment and Media Programs Division Office of Compliance

cc: Charlie Garlow, OCE  
Susan Fairchild, OAQPS  
Chris Kaczmarek, OGC  
Larry Hacker, Region 7



## U.S. Environmental Protection Agency Applicability Determination Index

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**Control Number: A970008**

**Category:** Asbestos  
**EPA Office:** Region 3  
**Date:** 09/04/1997  
**Title:** Residential Exemption  
**Recipient:** Rader, Paul  
**Author:** Spink, Marcia L.

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**Subparts:** Part 61, M, Asbestos

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**References:** 61.141

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### **Abstract:**

Q. A university plans to purchase all the property within the area of recently acquired residences and intends to demolish them. The university believes these demolitions are subject to the residential exemption because it considers each residence a separate site.

A. The structures in question are not subject to the residential exemption because they are part of an ongoing demolition project conducted by the university. The NESHAP Clarification of Intent (FR Notice 38725) views a continuous or single site as "parcels on the same city block" and considers these projects subject to asbestos NESHAP removal practices.

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### **Letter:**

Mr. Paul Rader, Engineer  
Asbestos Program Supervisor  
Division of Environmental Protection  
1558 Washington Street, East  
Charleston, WV 25311

Re: Applicability Determination Request for Residential Building Exemption (40 C.F.R. part 61, subpart M)

Dear Mr. Rader:

This letter is the Environmental Protection Agency (EPA) Region III response to your correspondence dated March 25, 1997, requesting an applicability determination under the Clean Air Act. Although previous discussions verbally established our position on this situation, this letter will formally confirm that determination.

More specifically, your letter asked for a determination as to whether activities conducted by Marshall University, located in Huntington, West Virginia, were subject to the National Emission Standard for Hazardous Air Pollutants for Asbestos (Asbestos NESHAP). As explained, Marshall University wanted to demolish residential structures owned by the University without removing the regulated asbestos containing material (RACM). The University believed that each residential structure was subject to the residential exemption from NESHAPs. Your stated position was that the subject demolitions are covered under the "Asbestos NESHAP Clarification of Intent" (60 FR 38725 Policy Statement). On November 20, 1990, the Environmental Protection Agency amended the National Emission Standard for Hazardous Air Pollutants for Asbestos (Asbestos NESHAP) to define installation in relation to the residential building exemption. Specifically, 40 C.F.R. 61.141 defined installation as any group of buildings under the control of the same owner or operator. Marshall University and the buildings under question are considered an installation according to this definition.

As you stated in your letter, Federal Register Notice 38725 clarifies EPA's intention

that the residential building exemption does not apply to the renovation or demolition of residential buildings as part of larger projects. Given the close proximity (a block) of the structures to Marshall University, the fact that the majority of the area in between them is owned by Marshall, and the fact that Marshall University has been and continues to be purchasing parcels of land in that immediate area for the purpose of annexation, NESHAP regulations should be followed. The Clarification of Intent views a continuous or single site as "parcels on the same city block." Therefore, Marshall University and its acquired residential structures are one continuous site, especially since the University plans to acquire all the property in the existing site area.

The Region 3 Office has coordinated with our Headquarters Office of Compliance (OC) within the Office of Enforcement and Compliance Assurance (OECA). OECA is in agreement with us that Marshall University's residential structure demolition project is under the purview of Asbestos NESHAP and that the NESHAP residential exemption does not apply.

The U.S. EPA Administrator has delegated the authority to make applicability determinations to the Regional Administrators. The Regional Administrator redelegated this authority to the Director of the Air, Radiation and Toxics Division (ARTD) and the ARTD Associate Director for Air Programs. Accordingly, EPA hereby determines that the Asbestos NESHAP residential exemption does not apply to the Marshall University demolition project. We concur with your preliminary determination to Dr. Edward Grose, Senior Vice President for Operations at Marshall University of the need for the University to comply with asbestos NESHAP during its demolition operations.

I hope this information is helpful in clarifying the applicability of the Asbestos NESHAP to the situation at Marshall University. If there are any additional questions regarding this matter, please feel free to contact Donald J. Lott, Chief of the Pesticides and Asbestos Enforcement Section, at (215) 566-2041.

Sincerely,

Marcia L. Spink  
Associate Director for Air Programs

Enclosure

cc: Donald J. Lott, EPA  
Racine M. Leonard, EPA  
Tom Ripp, EPA-HQ



AK-10-002-0179

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

JAN 3 1 2011

REPLY TO THE ATTENTION OF:

Mayor Jay Williams  
City of Youngstown  
City Hall  
26 South Phelps Street  
Youngstown, Ohio 44503

Dear Mayor Williams:

Thank you for your letter of December 3, 2010, concerning residential demolitions in Youngstown, Ohio and compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP).

The U.S. Environmental Protection Agency has consistently interpreted the NESHAP for asbestos regulation as applying to the mass demolition of residential structures. While the regulation has a residential building exemption provision, EPA has interpreted this exemption as being inapplicable when numerous residential buildings are being demolished for reasons of public health, welfare, and safety, as part of a single project, or if such residences meet the definition of an installation. I am enclosing a copy of a recent EPA letter to the Ohio Environmental Protection Agency which contains a more detailed discussion of EPA's position.

On December 1, 2010, EPA held a roundtable in Toledo, Ohio to discuss the problems that municipalities and state agencies are encountering with abandoned houses. EPA is currently evaluating whether there are additional ways we can assist with the environmental issues associated with the large-scale demolition of abandoned houses. We welcome your input as to how we can all meet our obligations more effectively, in a manner that protects public health and the environment.

Again, thank you for your letter. If you have further questions, please contact me or your staff may contact Ronna Beckmann, or Denise Gawlinski, the Region 5 Intergovernmental Liaisons, at (312) 886-3000.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Hedman', with a long horizontal line extending to the right.

Susan Hedman  
Regional Administrator

Enclosure

cc: Scott J. Nally, Director  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, OH 43216-1049

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, OH 43216-1049

Bob Princic, Supervisor  
Northeast District Office, Ohio EPA  
2110 East Aurora Road  
Twinsburg, Ohio 44087