



December 22, 2016

**NOTICE OF VIOLATION**

**CERTIFIED MAIL NO. 7014 0510 0002 2503 8103**

Mr. Robert Haley  
Birdsboro Power, LLC  
PO Box 314  
Birdsboro, PA 19508

Re: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County

Dear Mr. Haley:

On December 8, 2016, DEP learned from Environmental and Infrastructure Group (EIG) that one or more of the 4 brick chimneys located at the former Armorcast facility, located at 1 Armorcast Boulevard in Birdsboro, had been undermined on or before December 8, 2016 in order to place explosive charges for imminent demolition activities. At that time, no Asbestos Abatement and Demolition/Renovation Notification Form (Notification Form) had been filed with DEP or EPA for the demolition activity. Therefore, at that time, DEP Air Quality staff advised EIG that proceeding with the demolition before filing the Notification Form, and waiting the required 10-working-day notice period, would constitute a violation of the Federal Subpart M asbestos regulations. The DEP has determined that Birdsboro Power, LLC owns the property and contracted Kiewit Power Constructors as the general contractor. Kiewit then subcontracted the demolition of the chimneys to EIG.

On December 9, 2016, DEP received a Notification Form for the chimney demolitions. The Notification Form was postmarked December 8, 2016 and stated in Box 14 that the demolition was scheduled to begin on December 23, 2016. Nevertheless, based on further communications between site personnel and DEP Mining staff, it was determined that the already-placed explosive charges could neither be safely removed, nor safely left in place for an extended time period. Therefore, on instruction of DEP, the site personnel proceeded to complete the demolition on December 9, 2016. Although it was necessary to remove the stacks promptly for safety reasons once the explosive charges were set, DEP considers the irreversible action of setting the charges to be the beginning of the demolition of the chimney structures. This was not preceded by a timely asbestos Notification Form.

DEP has determined that the 4 chimneys at 1 Armorcast Boulevard constituted industrial structures and were subject facilities as defined under 40 CFR Part 61 Subpart M: National Emissions Standards for Asbestos ("Subpart M"). According to Subpart M, demolition of a facility must be preceded by a notification. According to 40 CFR Part 61 Section 61.145(b)(3)(i) the notification must be submitted at least ten working days before the demolition begins.

By commencing demolition operations without submitting a Notification Form at least ten working days before the demolition commenced you caused violations of 40 CFR Part 61 Section 61.145(b)(3)(i).

The violation identified above also constitutes a violation of 25 Pa Code Section 124.3 which fully incorporates Subpart M of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Part 61.

Violations of 40 CFR Part 61 Section 61.145 (b)(3)(i) and 25 Pa Code Section 124.3 constitute unlawful conduct and a public nuisance as defined by Sections 8 and 13 of the Air Pollution Control Act ("APCA"), 35 P.S. 4008 and 4013 for each day of violation. Violations of the Department's Rules and Regulations are subject to the penalties of Sections 9 and 9.1 of the APCA.

With regard to the above mentioned violations, please submit within 15 days of receipt of this letter, an abatement plan detailing corrective measures that will be implemented to assure future compliance with the regulations. Any abatement plan submitted should include a revised Notification Form, indicating the actual date demolition began and was completed.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

Electronic versions of the regulations listed above can be found at the following website addresses:

25 PA Code citations: [http://www.pacode.com/secure/data/025/article1CIII\\_toc.html](http://www.pacode.com/secure/data/025/article1CIII_toc.html)

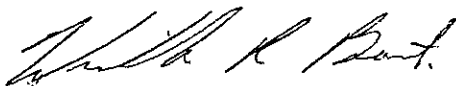
Air Pollution Control Act:

<http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Pollutants/regs/apca.pdf>

Code of federal regulations: <http://www.ecfr.gov/cgi-bin/ECFR?page=browse>

If you have any questions or concerns, please call me at 610.916.0100.

Sincerely,

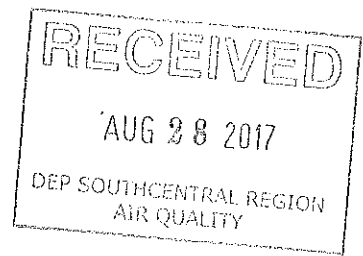


William R. Borst  
Air Quality District Supervisor

cc: Southcentral Regional Office



December 22, 2016



**NOTICE OF VIOLATION**

**CERTIFIED MAIL NO. 7014 0510 0002 2503 8097**

Edmund C. Vernier, Jr.  
Environmental and Infrastructure Group  
204 Mill Street, Suite 102  
Bristol, PA 19007

Re: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County

Dear Mr. Vernier:

On December 8, 2016, DEP learned from Environmental and Infrastructure Group (EIG) that one or more of the 4 brick chimneys located at the former Armorcast facility, located at 1 Armorcast Boulevard in Birdsboro, had been undermined on or before December 8, 2016 in order to place explosive charges for imminent demolition activities. At that time, no Asbestos Abatement and Demolition/Renovation Notification Form (Notification Form) had been filed with DEP or EPA for the demolition activity. Therefore, at that time, DEP Air Quality staff advised EIG that proceeding with the demolition before filing the Notification Form, and waiting the required 10-working-day notice period, would constitute a violation of the Federal Subpart M asbestos regulations. The DEP has determined that Birdsboro Power, LLC owns the property and contracted Kiewit Power Constructors as the general contractor. Kiewit then subcontracted the demolition of the chimneys to EIG.

On December 9, 2016, DEP received a Notification Form for the chimney demolitions. The Notification Form was postmarked December 8, 2016 and stated in Box 14 that the demolition was scheduled to begin on December 23, 2016. Nevertheless, based on further communications between site personnel and DEP Mining staff, it was determined that the already-placed explosive charges could neither be safely removed, nor safely left in place for an extended time period. Therefore, on instruction of DEP, the site personnel proceeded to complete the demolition on December 9, 2016. Although it was necessary to remove the stacks promptly for safety reasons once the explosive charges were set, DEP considers the irreversible action of setting the charges to be the beginning of the demolition of the chimney structures. This was not preceded by a timely asbestos Notification Form.

DEP has determined that the 4 chimneys at 1 Armorcast Boulevard constituted industrial structures and were subject facilities as defined under 40 CFR Part 61 Subpart M: National Emissions Standards for Asbestos ("Subpart M"). According to Subpart M, demolition of a facility must be preceded by a notification. According to 40 CFR Part 61 Section 61.145(b)(3)(i) the notification must be submitted at least ten working days before the demolition begins.

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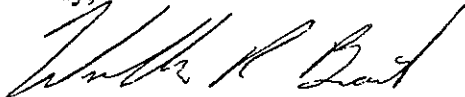
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<http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Pollutants/regs/apca.pdf>

Code of federal regulations: <http://www.ecfr.gov/cgi-bin/ECFR?page=browse>

If you have any questions or concerns, please call me at 610.916.0100.

Sincerely,



William R. Borst  
Air Quality District Supervisor

cc: Southcentral Regional Office



December 22, 2016

**NOTICE OF VIOLATION**

**CERTIFIED MAIL NO. 7014 0510 0002 2503 8080**

Mr. Greg Young  
Kiewit Power Constructors  
1 Armorcast Boulevard  
Birdsboro, PA 19508

Re: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County

Dear Mr. Young:

On December 8, 2016, DEP learned from Environmental and Infrastructure Group (EIG) that one or more of the 4 brick chimneys located at the former Armorcast facility, located at 1 Armorcast Boulevard in Birdsboro, had been undermined on or before December 8, 2016 in order to place explosive charges for imminent demolition activities. At that time, no Asbestos Abatement and Demolition/Renovation Notification Form (Notification Form) had been filed with DEP or EPA for the demolition activity. Therefore, at that time, DEP Air Quality staff advised EIG that proceeding with the demolition before filing the Notification Form, and waiting the required 10-working-day notice period, would constitute a violation of the Federal Subpart M asbestos regulations. The DEP has determined that Birdsboro Power, LLC owns the property and contracted Kiewit Power Constructors as the general contractor. Kiewit then subcontracted the demolition of the chimneys to EIG.

On December 9, 2016, DEP received a Notification Form for the chimney demolitions. The Notification Form was postmarked December 8, 2016 and stated in Box 14 that the demolition was scheduled to begin on December 23, 2016. Nevertheless, based on further communications between site personnel and DEP Mining staff, it was determined that the already-placed explosive charges could neither be safely removed, nor safely left in place for an extended time period. Therefore, on instruction of DEP, the site personnel proceeded to complete the demolition on December 9, 2016. Although it was necessary to remove the stacks promptly for safety reasons once the explosive charges were set, DEP considers the irreversible action of setting the charges to be the beginning of the demolition of the chimney structures. This was not preceded by a timely asbestos Notification Form.

DEP has determined that the 4 chimneys at 1 Armorcast Blvd constituted industrial structures and were subject facilities as defined under 40 CFR Part 61 Subpart M: National Emissions Standards for Asbestos ("Subpart M"). According to Subpart M, demolition of a facility must be preceded by a notification. According to 40 CFR Part 61 Section 61.145(b)(3)(i) the notification must be submitted at least ten working days before the demolition begins.

By commencing demolition operations without submitting a Notification Form at least ten working days before the demolition commenced you caused violations of 40 CFR Part 61 Section 61.145(b)(3)(i).

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With regard to the above mentioned violations, please submit within 15 days of receipt of this letter, an abatement plan detailing corrective measures that will be implemented to assure future compliance with the regulations. Any abatement plan submitted should include a revised Notification Form, indicating the actual date demolition began and was completed.

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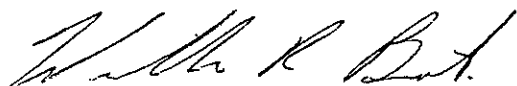
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Code of federal regulations: <http://www.ecfr.gov/cgi-bin/ECFR?page=browse>

If you have any questions or concerns, please call me at 610.916.0100.

Sincerely,



William R. Borst  
Air Quality District Supervisor

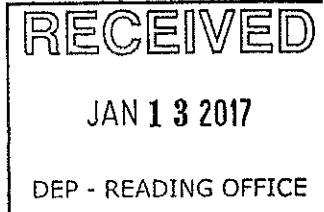
cc: Southcentral Regional Office

*Birdsboro Power, LLC*  
*PO Box 314*  
*Birdsboro, PA 19508*

January 12, 2017

*Sent via: Overnight*

Mr. William R. Borst  
Air Quality District Supervisor  
Pennsylvania Department of Environmental Protection  
Reading District Office  
1005 Crossroads Boulevard  
Reading, PA 19605



RE: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County

Letter No.: BPP-DEP-001

Dear Mr. Borst:

We are in receipt of your Notice of Violation dated December 22, 2016. This notification was received in our office on Tuesday, January 3, 2017.

We recognize and respect your agency's interpretation of the regulation, 40 CFR Part 61 Section 61.145(b)(3)(i), which requires notification for demolition of facilities.

The decision not to notify the department regarding the demolition of stacks was due to our contractor's misinterpretation relating to the NESHAP definition of *Facilities* referenced in 40 CFR 61.141. EIG did not believe the regulation applied to the stacks in part because stacks alone would not constitute a *facility* and was in receipt of sampling results which indicated no asbestos containing materials were present in the stacks.

Once alerted to the PA DEP's request for a notification on December 8, 2016, the project's contractor immediately suspended demolition activity and submitted the appropriate paperwork to the EPA and PA DEP. It was only after direction from the PA DEP Bureau of Mining Programs to proceed with demolition "as soon as possible", due to the agency perceiving an unsafe condition, that demolition was completed. There is nothing more important to us as a company than the safety of our contractors, all site personnel, and the surrounding community. Please see attached copy of the PA DEP Bureau of Mining Programs Explosives Inspection Report dated December 9, 2016.

To assure future compliance with the regulations, Birdsboro Power, LLC's contractor, EIG, will implement the following corrective measures.

*Birdsboro Power, LLC*  
*PO Box 314*  
*Birdsboro, PA 19508*

1. Submit a revised Notification Form that indicates the actual date that demolition of the stacks was began and completed. The revised Notification Form is attached.
2. Submit a Notification Form for the remaining structures at the Birdsboro Power facility at least 10 working days in advance of demolition activities. The facility encompasses multiple structures that will be abated and demolished. PADEP will be notified and updated as to the actual demolition dates of individual structures.
3. Update the notification procedures in EIG's Health and Safety Plan (HASP). The Demolition Safety Requirements in the HASP have been revised, and require that ALL demolition projects shall submit notification at least 10 days prior to commencing demolition activities.
4. Provide training to all project staff personnel on the demolition notification requirements. Training will be provided the week of January 16<sup>th</sup> to staff currently assigned to the project.

To assure regulatory compliance in the future, the project has instructed our contractor(s) to submit timely notifications prior to any demolition and/or asbestos remediation work the project anticipates moving forward. If there are any questions that may arise pertaining to regulatory interpretation, project personnel will contact the PA DEP for clarification.

If you would like to discuss this Notice of Violation and the project's corrective measures, we would be happy to meet with you at your convenience.

Sincerely,



Jim Palumbo, P.E.  
Project Manager  
Birdsboro Power, LLC



*Birdsboro Power, LLC*

*PO Box 314*

*Birdsboro, PA 19508*

cc: Kiewit Power Constructors Co. – Birdsboro Project Manager  
9401 Renner Blvd.  
Lenexa, KS 66219

Power Plant Management Services, LLC - Jim Berra  
1155 Dairy Ashford, Suite 500  
Houston, TX 77079

Raj Suri, EmberClear  
File: 15.40.02


**ASBESTOS ABATEMENT AND DEMOLITION/RENOVATION NOTIFICATION FORM**
**For Official Use Only**

Date Received 1

Date Received 2

Postmark Date: \_\_\_\_\_

Project ID#: \_\_\_\_\_

Permit #: \_\_\_\_\_

Other #: \_\_\_\_\_

Inspector: \_\_\_\_\_

NOTICE: This is not a valid asbestos abatement notification for the purposes of the Asbestos Occupations Accreditation and Certification Act unless individuals and contractors have met the certification requirements as set forth in the Asbestos Occupations Accreditation and Certification Act, Act of 1990, P.L. 805, No. 194 (63 P.S. Sections 2101-2112).

**REFER TO THE ATTACHED INSTRUCTIONS FOR INFORMATION AND REQUIREMENTS.**

1.	TYPE OF NOTIFICATION (check one):	<input type="checkbox"/> Initial	<input type="checkbox"/> Annual Notification
	<input checked="" type="checkbox"/> Revision (highlight here, and changes)	<input type="checkbox"/> Phase of Annual Notification	
	<input type="checkbox"/> Postponement	<input type="checkbox"/> Cancellation	
Date of Initial Notification or, if previously revised, date of last revision: <u>12/8/2016</u>			
2.	PROJECT LOCATION (check one):	<input type="checkbox"/> Allegheny County <input type="checkbox"/> City of Philadelphia <input checked="" type="checkbox"/> Other Location in PA (specify county): <u>Berks</u>	
3.	For Allegheny County and City of Philadelphia projects only:		
	A. Does this project require a permit? <input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes is checked, a permit application must be submitted along with this notification and approved prior to the start of the project.)		
	B. For City of Philadelphia projects requiring a permit:		
	Asbestos project inspector: _____	Certification #: _____	
	Company name: _____		
	Address: _____		
	City: _____	State: _____	Zip: _____ Phone: _____
4.	WILL ALTERNATIVE METHODS TO ANY OF THE APPLICABLE REGULATIONS BE USED?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
(If Yes is checked, approval must be obtained prior to the start of the project. Please contact the appropriate DEP regional office or local government agency (see reverse of Instruction Sheet for contact list).			
5.	TYPE OF OPERATION (check one):	<input type="checkbox"/> Abatement prior to Demolition	
	<input checked="" type="checkbox"/> Demolition <input type="checkbox"/> Ordered Demolition	<input type="checkbox"/> Renovation	<input type="checkbox"/> Emergency Renovation
6.	FACILITY DESCRIPTION:	Job No.: <u>E0-02</u>	(see Instructions)
	Facility Name: <u>Birdsboro Energy Center</u>		
	Street/Rural Address: <u>1 Armorcast Road</u>		
	City: <u>Birdsboro</u>	State: <u>PA</u>	Zip Code: <u>19058</u>
	Present use: <u>Abandoned</u>	Prior use: <u>Chimney</u>	
	Will the facility be occupied during the abatement activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	Facility size in square feet: <u>12' x 165'</u>	# of floors: _____	Age in years: <u>75</u>
7.	ABATEMENT CONTRACTOR:		
	Company name: <u>N/a</u>		
	Allegheny County or City of Philadelphia License # (if applicable): _____		
	Street/Rural/POB Address: _____		
	City: _____	State: _____	Zip: _____
Contact:	_____	Telephone No. (between 8:00 & 4:30): _____	

8. DEMOLITION CONTRACTOR:  
 Company name: Environmental and Infrastructure Group  
 Street/Rural/POB Address: 204 Mill Street, Suite 102  
 City: Bristol State: PA Zip: 19007  
 Contact: Edmund C Vernier Jr. Telephone No. (between 8:00 & 4:30): 215-458-7602

9. FACILITY OWNER:  
 Owner name: Birdsboro Power, LLC  
 Street/Rural/POB Address: 1 Armorcast Road.  
 City: Birdsboro State: PA Zip: 19508  
 Contact: Robert Haley Telephone No. (between 8:00 & 4:30): 860-301-2620

10. FACILITY INSPECTION (required for renovation and demolition projects):  
 Building inspector: Brian Rosini Certification # ACC-04 16-6-011  
 Date of inspection: 05/26/2016 Is any material assumed to be asbestos?  Yes  No  
 Procedure, including analytical method, if appropriate, used to detect the presence of asbestos material:  
PLM bulk

Building is ID and in danger of collapse. An asbestos investigator will be on site during demolition. (Philadelphia only)

11. IS ANY TYPE OF ASBESTOS PRESENT  Yes  No If Yes, please list in #12

12. TYPE OF ACM, DESCRIPTION & LOCATION OF MATERIAL, APPROXIMATE AMOUNT OF ACM, TYPE OF ABATEMENT AND FINAL AIR CLEARANCE METHOD.  
 PROVIDE INFORMATION IN THE SPACES BELOW, THEN CONTINUE ON ANOTHER SHEET, IF NECESSARY, USING THE SAME FORMAT.

Code *	Description of material	Location of material (room/floor/area)	Amount of ACM	Code **	Code ***	Code ****
n/a	n/a	n/a	n/a	n/a	n/a	n/a

Code *	Code **	Code ***	Code ****
Type of ACM	Units	Type of abatement	Final Clearance
FRI - Friable ACM	LF - Linear ft.	REM - Removal	PCM - Phase contrast microscopy
NF1 - Cat I nonfriable ACM	SF - Square ft.	CAP - Encapsulation	TEM - Transmission electron microscopy
NF2 - Cat II nonfriable ACM	CF - Cubic ft.	CLO - Enclosure	
(Note: Allegheny County treats all ACM as friable)		NON - None	

13. Is this project regulated by NESHAP  Yes  No  
 A project that includes the demolition of any defined "facility" is regulated by NESHAP. A renovation project is also regulated by NESHAP when the amounts of friable ACM, or ACM that may be rendered friable, are as follows: 260 LF or 160 SF or 35 CF.

14. OPERATION SCHEDULE(S) (as applicable)

- A. Asbestos abatement: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_ am \_\_\_\_\_ pm to \_\_\_\_\_ am \_\_\_\_\_ pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- B. Demolition: Start Date: 12/09/2016 Completion Date: 12/09/2016  
 Daily hours of operation: 6:00  am  pm to 4:30  am  pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- C. Renovation: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_ am \_\_\_\_\_ pm to \_\_\_\_\_ am \_\_\_\_\_ pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su

COMMENTS:

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15. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK:

Fell (4) abandoned brick chimneys (stacks) via use of controlled explosives

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16. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO REMOVE ACM AND TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND RENOVATION SITE:

N/A

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17. WASTE TRANSPORTER(S)

- A. Transporter #1 name: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. Transporter #2 name: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

**18. WASTE DISPOSAL SITE(S): (any asbestos containing material)**

A. Landfill name: n/a DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. Landfill name: \_\_\_\_\_ DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

**19. AIR MONITORING FIRM(S)**

A. Company name/individual: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. Final clearance firm: (if different than 19A) \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

Final clearance firm was hired by (check one)  Contractor  Owner  
 Other Explain \_\_\_\_\_

**20. AIR SAMPLE FIRM(S) (City of Philadelphia projects only)**

A. PCM company name/individual: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. TEM company name: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

**21. FOR EMERGENCY RENOVATIONS:**

Date of emergency (mm/dd/yy): \_\_\_\_\_ Hour of emergency: \_\_\_\_\_  am  pm

Description of the sudden, unexpected event:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden as a consequence of complying with the 10 working day notification requirement:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

22. FOR ORDERED DEMOLITIONS (attach copy of order):  
 Government agency that ordered: \_\_\_\_\_  
 Name of individual who ordered: \_\_\_\_\_ Title: \_\_\_\_\_  
 Date of order (mm/dd/yy): \_\_\_\_\_ Date ordered to begin (mm/dd/yy): \_\_\_\_\_

23. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLLED, PULVERIZED, OR REDUCED TO POWDER:  
 Stop work immediately & have suspect material sampled.  
 \_\_\_\_\_  
 \_\_\_\_\_

24. PENNSYLVANIA CERTIFICATIONS/LICENSES:  
 Project designer: N/A Certification #: \_\_\_\_\_  
 Contractor (Individual): \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Supervisor: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Contractor (Firm) \_\_\_\_\_ Certification #: \_\_\_\_\_

\*\*\*\*\* SIGN BOTH STATEMENTS \*\*\*\*\*

25. I HEREBY CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF 40 CFR PART 61 SUBPART M (if applicable) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING ALL WORKING HOURS, AND I CERTIFY THAT ALL WORK WILL BE DONE IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL AGENCY RULES AND REGULATIONS.

\_\_\_\_\_  
 (Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

26. I HEREBY CERTIFY THAT THE FOREGOING STATEMENTS AND THE INFORMATION CONTAINED IN THIS NOTIFICATION FORM ARE TRUE. THIS CERTIFICATION IS MADE SUBJECT TO THE PENALTIES SET FORTH IN 18 PA C.S. §4904 RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.

\_\_\_\_\_  
 (Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

FOR OFFICIAL USE ONLY



OFFICIAL USE ONLY

Date 12/9/16

## EXPLOSIVES INSPECTION REPORT

(TYPE: EXPLO)

Name: Controlled Demolition Inc.	Municipality/Township: Birdsboro Borough	License/Permit	Program	Inspected Entity	ENF Type	IRC
Address: 13401 Still Haven Ct. Phoenix, MD 31131	County: Berks	BAP#06165004	MEX	SITE		NOVIO
	Blaster's Name: Tom Doud	SMP				
Telephone: 410-667-6610	Blasters License: BL-7094	BL				
	Weather:	SP				
Contract Blaster:	Wind Direction:	PP				
Address:	Site Name: Felling of 4 Brick Chimneys	Longitude:		Permit Status: active		
	Complaint ID:	Latitude:		Inspection Result: NOVIO - inspection of proposed blasting.		

Remarks: On December 8, 2016 DEP District Mining Operations Pottsville received a notification from Tom Doud (CDI) that 2 of the 4 approx 165' chimney stacks were loaded at the old "Amorcast" plant under permit #06165004. He stated that they had been ceased by DEP Air Quality for failure to file an asbestos analysis that warrants a ten day notice under Article III Air Resources. While on site December 9, 2016 a determination has been made by DEP District Mining Operations that the operator has created an unsafe or potentially unsafe condition; as they have proceeded to load a shot and not initiate/fire the shot. This loaded shot creates or constitutes an unsafe condition in that the shot could be initiated in an uncontrolled or accidental manner. Therefore, the Department is requiring that the shots be initiated/fired as soon as possible. Additionally, a determination has been made that the other 2 chimneys not yet loaded will be loaded and fired; consistent with the original plan. No violations.

Person contacted (please print) Tom Doud	Title blaster	Times-On-Site _____ to _____	Page 1 of _____				
Blasting Inspector Michael Duke	ID#	6	4	4	1	3	6
Accompanied By	ID#						

The responsible party signature acknowledges that he/she has read the report, including the reverse side, and that he/she was given the opportunity to discuss it with the investigator. The signature does not necessarily mean he/she agrees with the report.

- White - District File     
  Yellow - Operator     
  Pink - Blasting Insp.     
  Goldenrod - SMCI/Other

### Enforcement Codes

CESSATION ORDER	CESOR
COMPLIANCE ORDER	CMPOR
CESSATION ORDER-FAILURE TO ABATE	COFTA
NOTICE OF VIOLATION	NOV
SUMMARY CITATION	SUMM
MISDEMEANOR	MIS
ORDER-TIME EXTENTION	TIMEX
PERMIT SUSPENSION	SUSPM
PERMIT REVOCATION	REVPM
THIRD PARTY RESOLUTION	3PRTY

### Inspection Result Codes

IN COMPLIANCE WITH SCHEDULE	ICS
NO VIOLATIONS NOTED	NOVIO
NO VIOLATIONS-FAC INACTIVE FOR INSPECTION	NVFIA
NO VIOLATIONS-PERMANENTLY SHUT DOWN	NVPSD
OUTSTANDING VIOLATIONS-NO VIOLS REQ	OUTNO
OUTSTANDING VIOLATIONS-VIOLS REQ'D	OUTST
PENDING	PEND
RECURRING VIOLATIONS	RECUR
VIOL(S) NOTED & IMMEDIATELY CORRECTED	VIOIC
VIOLATION(S) NOTED	VIOLS
<del>VIOLATION(S) &amp; REGURRING VIOLATIONS</del>	<del>VRV</del>

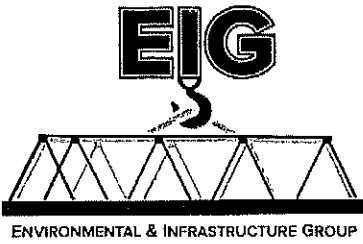
### Inspected Entity Codes

PRIMARY FACILITY (MINING PERMITS)	PF
SITE (BAP'S)	SITE
CLIENT (BL'S, PP'S, SP'S)	CLNT

### Program Codes

COAL MINING	MCM
NON-COAL MINING	MIM
NON-MINING	MEX

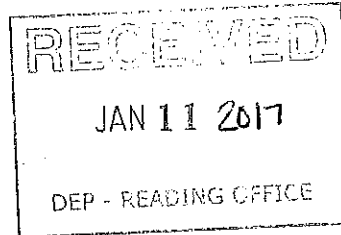




**Environmental and Infrastructure Group, LLC**  
204 Mill Street, Suite 102  
Bristol, PA 19007  
Phone: 215-458-7602  
Fax: 215-458-7921  
www.eig3.com

January 10, 2017

Mr. William R. Borst  
Air Quality District Supervisor  
Pennsylvania Department of Environmental Protection  
Reading District Office  
1005 Crossroads Boulevard  
Reading, PA 19605



RE: Non-Notification of Demolition  
1 Armorcast Road, Birdsboro, Berks County  
Certified Mail No. 7014 0510 0002 2503 8097

Dear Mr. Borst,

Environmental and Infrastructure Group is in receipt of the PA DEP Notice of Violation dated December 22, 2016.

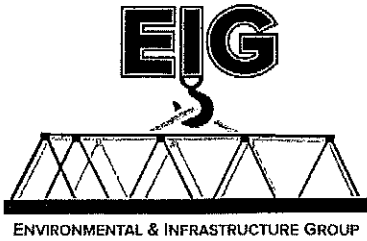
The NOV was received in our office on Tuesday December 27, 2016.

We recognize and respect your agency's interpretation of the regulation, 40 CFR Part 61 Section 61.145(b)(3)(i), which requires notification for demolition of facilities.

As an environmental contracting company, EIG views the responsibility of protecting the environment as a core principle of our business and acts accordingly when developing standard operating procedures and work plans for specific projects. EIG was in receipt of sampling results which indicated that no asbestos containing materials were present in the stacks and enacted a plan to safely demolish the stacks in accordance with industry best practices.

The decision not to notify your department regarding the demolition of stacks was due to our company's interpretation relating to the NESHAP definition of "Facilities" referenced in 40 CFR 61.141. EIG did not believe the regulation applied to stacks due to the fact that stacks alone would not constitute a "facility" and were proven to not contain asbestos containing materials.

Once alerted to the PA DEP's request for a notification on December 8th, 2016, EIG immediately suspended demolition activity and submitted the appropriate paperwork to the EPA and PA DEP. It was only after direction from the PA DEP Bureau of Mining Programs to proceed with demolition "as soon as possible", due to the agency perceiving an unsafe condition, that EIG proceeded with the demolition activity. Please see attached copy of the PA DEP Bureau of Mining Programs Explosives Inspection Report dated December 9, 2016.



**Environmental and Infrastructure Group, LLC**  
204 Mill Street, Suite 102  
Bristol, PA 19007  
Phone: 215-458-7602  
Fax: 215-458-7921  
www.eig3.com

To assure future compliance with the regulations, EIG will implement the following corrective measures.

1. Submit a revised Notification Form that indicates the actual date that demolition of the stacks was began and completed. The revised Notification Form is attached.
2. Submit a Notification Form for the remaining structures at the Birdsboro Power facility at least 10 working days in advance of demolition activities. The facility encompasses multiple structures that will be abated and demolished. PADEP will be notified and updated as to the actual demolition dates of individual structures.
3. Update the notification procedures in EIG's Health and Safety Plan (HASP). The Demolition Safety Requirements in the HASP have been revised, and require that ALL demolition projects shall submit notification at least 10 days prior to commencing demolition activities. The updated requirement has been added to EIG's HASP section 15.3.
4. Provide training to all project staff personnel on the demolition notification requirements. Training will be provided the week of January 16<sup>th</sup> to staff currently assigned to the project.

The revised Demolition Notification Form is attached per your request. If you would like to discuss this Notice of Violation and EIG's corrective measures, we would be happy to meet with you at your convenience.

Respectfully,

Richard McManus  
President



December 22, 2016

**NOTICE OF VIOLATION**

**CERTIFIED MAIL NO. 7014 0510 0002 2503 8097**

Edmund C. Vernier, Jr.  
Environmental and Infrastructure Group  
204 Mill Street, Suite 102  
Bristol, PA 19007

Re: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County

Dear Mr. Vernier:

On December 8, 2016, DEP learned from Environmental and Infrastructure Group (EIG) that one or more of the 4 brick chimneys located at the former Armorcast facility, located at 1 Armorcast Boulevard in Birdsboro, had been undermined on or before December 8, 2016 in order to place explosive charges for imminent demolition activities. At that time, no Asbestos Abatement and Demolition/Renovation Notification Form (Notification Form) had been filed with DEP or EPA for the demolition activity. Therefore, at that time, DEP Air Quality staff advised EIG that proceeding with the demolition before filing the Notification Form, and waiting the required 10-working-day notice period, would constitute a violation of the Federal Subpart M asbestos regulations. The DEP has determined that Birdsboro Power, LLC owns the property and contracted Kiewit Power Constructors as the general contractor. Kiewit then subcontracted the demolition of the chimneys to EIG.

On December 9, 2016, DEP received a Notification Form for the chimney demolitions. The Notification Form was postmarked December 8, 2016 and stated in Box 14 that the demolition was scheduled to begin on December 23, 2016. Nevertheless, based on further communications between site personnel and DEP Mining staff, it was determined that the already-placed explosive charges could neither be safely removed, nor safely left in place for an extended time period. Therefore, on instruction of DEP, the site personnel proceeded to complete the demolition on December 9, 2016. Although it was necessary to remove the stacks promptly for safety reasons once the explosive charges were set, DEP considers the irreversible action of setting the charges to be the beginning of the demolition of the chimney structures. This was not preceded by a timely asbestos Notification Form.

DEP has determined that the 4 chimneys at 1 Armorcast Boulevard constituted industrial structures and were subject facilities as defined under 40 CFR Part 61 Subpart M: National Emissions Standards for Asbestos ("Subpart M"). According to Subpart M, demolition of a facility must be preceded by a notification. According to 40 CFR Part 61 Section 61.145(b)(3)(i) the notification must be submitted at least ten working days before the demolition begins.

By commencing demolition operations without submitting a Notification Form at least ten working days before the demolition commenced you caused violations of 40 CFR Part 61 Section 61.145(b)(3)(i).

The violation identified above also constitutes a violation of 25 Pa Code Section 124.3 which fully incorporates Subpart M of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Part 61.

Violations of 40 CFR Part 61 Section 61.145 (b)(3)(i) and 25 Pa Code Section 124.3 constitute unlawful conduct and a public nuisance as defined by Sections 8 and 13 of the Air Pollution Control Act ("APCA"), 35 P.S. 4008 and 4013 for each day of violation. Violations of the Department's Rules and Regulations are subject to the penalties of Sections 9 and 9.1 of the APCA.

With regard to the above mentioned violations, please submit within 15 days of receipt of this letter, an abatement plan detailing corrective measures that will be implemented to assure future compliance with the regulations. Any abatement plan submitted should include a revised Notification Form, indicating the actual date demolition began and was completed.

This Notice of Violation is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. ~~If the Department determines that an enforcement action is appropriate, you will be notified of the action.~~

Electronic versions of the regulations listed above can be found at the following website addresses:

25 PA Code citations: [http://www.pacode.com/secure/data/025/articleICIII\\_toc.html](http://www.pacode.com/secure/data/025/articleICIII_toc.html)

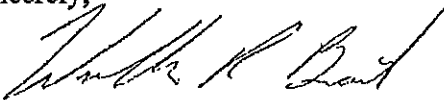
Air Pollution Control Act:

<http://files.dep.state.pa.us/Air/AirQuality/AQPortalFiles/Pollutants/regs/apca.pdf>

Code of federal regulations: <http://www.ecfr.gov/cgi-bin/ECFR?page=browse>

If you have any questions or concerns, please call me at 610.916.0100.

Sincerely,



William R. Borst  
Air Quality District Supervisor

cc: Southcentral Regional Office



**pennsylvania**  
 DEPARTMENT OF ENVIRONMENTAL  
 PROTECTION  
 READING DISTRICT OFFICE  
 1005 Crossroads Boulevard  
 Reading, PA 19605

THE RETURN ADDRESS IS ON THE OTHER SIDE OF THE MAIL  
**CERTIFIED MAIL**

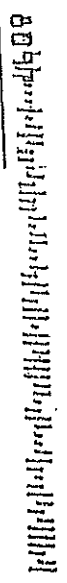


7014 0510 0002 2503 8097

EDMUND C VERNIER JR  
 ENVIRONMENTAL & INFRASTRUCTURE GROUP  
 204 MILL ST STE 102  
 BRISTOL PA 19007

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7014 0510 0002 2503





OFFICIAL USE ONLY

Date 12/9/16

## EXPLOSIVES INSPECTION REPORT

(TYPE: EXPLO)

Name: Controlled Demolition Inc.	Municipality/Township: Birdsboro Borough	License/Permit	Program	Inspected Entity	ENF Type	IRC
Address: 13401 Still Haven Ct. Phoenix, MD 31131	County: Berks	BAP#06165004	MEX	SITE		NOVIO
	Blaster's Name: Tom Doud	SMP				
Telephone: 410-667-6610	Blasters License: BL-7094	BL				
	Weather:	SP				
Contract Blaster:	Wind Direction:	PP				
Address:	Site Name: Felling of 4 Brick Chimneys	Longitude:	Permit Status: active			
	Complaint ID:	Latitude:	Inspection Result: NOVIO - Inspection of proposed blasting.			

Remarks: On December 8, 2016 DEP District Mining Operations Pottsville received a notification from Tom Doud (CDI) that 2 of the 4 approx 165' chimney stacks were loaded at the old "Armorcast" plant under permit #06165004. He stated that they had been ceased by DEP Air Quality for failure to file an asbestos analysis that warrants a ten day notice under Article III Air Resources. While on site December 9, 2016 a determination has been made by DEP District Mining Operations that the operator has created an unsafe or potentially unsafe condition; as they have proceeded to load a shot and not initiate/fire the shot. This loaded shot creates or constitutes an unsafe condition in that the shot could be initiated in an uncontrolled or accidental manner. Therefore, the Department is requiring that the shots be initiated/fired as soon as possible. Additionally, a determination has been made that the other 2 chimneys not yet loaded will be loaded and fired; consistent with the original plan. No violations.

Person contacted (please print) Tom Doud	Title blaster	Times-On-Site _____ to _____	Page 1 of _____				
Blasting Inspector Michael Duke	ID#	6	4	4	1	3	6
Accompanied By	ID#						

The responsible party signature acknowledges that he/she has read the report, including the reverse side, and that he/she was given the opportunity to discuss it with the investigator. The signature does not necessarily mean he/she agrees with the report.

- White - District File     
  Yellow - Operator     
  Pink - Blasting Insp.     
  Goldenrod - SMCI/Other

### Enforcement Codes

CESSATION ORDER	CESOR
COMPLIANCE ORDER	CMPOR
CESSATION ORDER-FAILURE TO ABATE	COFTA
NOTICE OF VIOLATION	NOV
SUMMARY CITATION	SUMM
MISDEMEANOR	MIS
ORDER-TIME EXTENTION	TIMEX
PERMIT SUSPENSION	SUSPM
PERMIT REVOCATION	REVPM
THIRD PARTY RESOLUTION	3PRTY

### Inspection Result Codes

IN COMPLIANCE WITH SCHEDULE	ICS
NO VIOLATIONS NOTED	NOVIO
NO VIOLATIONS-FAC INACTIVE FOR INSPECTION	NVFIA
NO VIOLATIONS-PERMANENTLY SHUT DOWN	NVPSD
OUTSTANDING VIOLATIONS-NO VIOLS REQ	OUTNO
OUTSTANDING VIOLATIONS-VIOLS REQ'D	OUTST
PENDING	PEND
RECURRING VIOLATIONS	RECUR
VIOL(S) NOTED & IMMEDIATELY CORRECTED	VIOIC
VIOLATION(S) NOTED	VIOLS
VIOLATION(S) & RECURRING-VIOLATIONS	VRV

### Inspected Entity Codes

PRIMARY FACILITY (MINING PERMITS)	PF
SITE (BAP'S)	SITE
CLIENT (BL'S, PP'S, SP'S)	CLNT

### Program Codes

COAL MINING	MCM
NON-COAL MINING	MIM
NON-MINING	MEX



**ASBESTOS ABATEMENT AND DEMOLITION/RENOVATION NOTIFICATION FORM**

<b>For Official Use Only</b>	Date Received 1	Date Received 2
Postmark Date: _____	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>	<div style="border: 1px solid black; width: 100%; height: 100%;"></div>
Project ID#: _____		
Permit #: _____		
Other #: _____		
Inspector: _____		

**NOTICE:** This is not a valid asbestos abatement notification for the purposes of the Asbestos Occupations Accreditation and Certification Act unless individuals and contractors have met the certification requirements as set forth in the Asbestos Occupations Accreditation and Certification Act, Act of 1990, P.L. 805, No. 194 (63 P.S. Sections 2101-2112).

**REFER TO THE ATTACHED INSTRUCTIONS FOR INFORMATION AND REQUIREMENTS.**

1.	TYPE OF NOTIFICATION (check one):	<input type="checkbox"/> Initial	<input type="checkbox"/> Annual Notification
	<input checked="" type="checkbox"/> Revision (highlight here, and changes)	<input type="checkbox"/> Phase of Annual Notification	
	<input type="checkbox"/> Postponement	<input type="checkbox"/> Cancellation	
	Date of Initial Notification or, if previously revised, date of last revision: <u>12/8/2016</u>		
2.	PROJECT LOCATION (check one):		
	<input type="checkbox"/> Allegheny County	<input type="checkbox"/> City of Philadelphia	<input checked="" type="checkbox"/> Other Location in PA (specify county): <u>Berks</u>
3.	For Allegheny County and City of Philadelphia projects only:		
	A. Does this project require a permit? <input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes is checked, a permit application must be submitted along with this notification and approved prior to the start of the project.)		
	B. For City of Philadelphia projects requiring a permit:		
	Asbestos project inspector: _____	Certification #: _____	
	Company name: _____		
	Address: _____		
	City: _____	State: _____	Zip: _____ Phone: _____
4.	WILL ALTERNATIVE METHODS TO ANY OF THE APPLICABLE REGULATIONS BE USED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	(If Yes is checked, approval must be obtained prior to the start of the project. Please contact the appropriate DEP regional office or local government agency (see reverse of Instruction Sheet for contact list).		
5.	TYPE OF OPERATION (check one):	<input type="checkbox"/> Abatement prior to Demolition	
	<input checked="" type="checkbox"/> Demolition	<input type="checkbox"/> Ordered Demolition	<input type="checkbox"/> Renovation
			<input type="checkbox"/> Emergency Renovation
6.	FACILITY DESCRIPTION:	Job No.: <u>E0-02</u> (see instructions)	
	Facility Name: <u>Birdsboro Energy Center</u>		
	Street/Rural Address: <u>1 Armorcast Road</u>		
	City: <u>Birdsboro</u>	State: <u>PA</u>	Zip Code: <u>19058</u>
	Present use: <u>Abandoned</u>	Prior use: <u>Chimney</u>	
	Will the facility be occupied during the abatement activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	Facility size in square feet: <u>12' x 165'</u>	# of floors: _____	Age in years: <u>75</u>
7.	ABATEMENT CONTRACTOR:		
	Company name: <u>N/a</u>		
	Allegheny County or City of Philadelphia License # (if applicable): _____		
	Street/Rural/POB Address: _____		
	City: _____	State: _____	Zip: _____
	Contact: _____	Telephone No. (between 8:00 & 4:30): _____	



8. DEMOLITION CONTRACTOR:  
 Company name: Environmental and Infrastructure Group  
 Street/Rural/POB Address: 204 Mill Street, Suite 102  
 City: Bristol State: PA Zip: 19007  
 Contact: Edmund C Vernier Jr. Telephone No. (between 8:00 & 4:30): 215-458-7602

9. FACILITY OWNER:  
 Owner name: Birdsboro Power, LLC  
 Street/Rural/POB Address: 1 Armorcast Road.  
 City: Birdsboro State: PA Zip: 19508  
 Contact: Robert Haley Telephone No. (between 8:00 & 4:30): 860-301-2620

10. FACILITY INSPECTION (required for renovation and demolition projects):  
 Building inspector: Brian Rosini Certification # ACC-04 16-6-011  
 Date of inspection: 05/26/2016 Is any material assumed to be asbestos?  Yes  No  
 Procedure, including analytical method, if appropriate, used to detect the presence of asbestos material:  
PLM bulk

Building is ID and in danger of collapse. An asbestos investigator will be on site during demolition. (Philadelphia only)

11. IS ANY TYPE OF ASBESTOS PRESENT  Yes  No If Yes, please list in #12

12. TYPE OF ACM, DESCRIPTION & LOCATION OF MATERIAL, APPROXIMATE AMOUNT OF ACM, TYPE OF ABATEMENT AND FINAL AIR CLEARANCE METHOD.  
 PROVIDE INFORMATION IN THE SPACES BELOW, THEN CONTINUE ON ANOTHER SHEET, IF NECESSARY, USING THE SAME FORMAT.

Code *	Description of material	Location of material (room/floor/area)	Amount of ACM	Code **	Code ***	Code ****
n/a	n/a	n/a	n/a	n/a	n/a	n/a

Code *	Code **	Code ***	Code ****
Type of ACM	Units	Type of abatement	Final Clearance
FRI - Friable ACM	LF - Linear ft.	REM - Removal	PCM - Phase contrast microscopy
NF1 - Cat I nonfriable ACM	SF - Square ft.	CAP - Encapsulation	TEM - Transmission electron microscopy
NF2 - Cat II nonfriable ACM	CF - Cubic ft.	CLO - Enclosure	
(Note: Allegheny County treats all ACM as friable)		NON - None	

13. Is this project regulated by NESHAP  Yes  No  
 A project that includes the demolition of any defined "facility" is regulated by NESHAP. A renovation project is also regulated by NESHAP when the amounts of friable ACM, or ACM that may be rendered friable, are as follows: 260 LF or 160 SF or 35 CF.

14. OPERATION SCHEDULE(S) (as applicable)

- A. Asbestos abatement: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_  am  pm to \_\_\_\_\_  am  pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- B. Demolition: Start Date: 12/09/2016 Completion Date: 12/09/2016  
 Daily hours of operation: 6:00  am  pm to 4:30  am  pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- C. Renovation: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_  am  pm to \_\_\_\_\_  am  pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su

COMMENTS:

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15. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK:

Fell (4) abandoned brick chimneys (stacks) via use of controlled explosives

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16. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO REMOVE ACM AND TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND RENOVATION SITE:

N/A

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17. WASTE TRANSPORTER(S)

- A. Transporter #1 name: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. Transporter #2 name: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

18. WASTE DISPOSAL SITE(S): (any asbestos containing material)

A. Landfill name: n/a DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. Landfill name: \_\_\_\_\_ DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

19. AIR MONITORING FIRM(S)

A. Company name/individual: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. Final clearance firm: (if different than 19A) \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

Final clearance firm was hired by (check one)  Contractor  Owner  
 Other Explain \_\_\_\_\_

20. AIR SAMPLE FIRM(S) (City of Philadelphia projects only)

A. PCM company name/individual: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

B. TEM company name: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

21. FOR EMERGENCY RENOVATIONS:

Date of emergency (mm/dd/yy): \_\_\_\_\_ Hour of emergency: \_\_\_\_\_  am  pm

Description of the sudden, unexpected event:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden as a consequence of complying with the 10 working day notification requirement:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

22. FOR ORDERED DEMOLITIONS (attach copy of order):

Government agency that ordered: \_\_\_\_\_  
Name of individual who ordered: \_\_\_\_\_ Title: \_\_\_\_\_  
Date of order (mm/dd/yy): \_\_\_\_\_ Date ordered to begin (mm/dd/yy): \_\_\_\_\_

23. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:

Stop work immediately & have suspect material sampled.  
\_\_\_\_\_  
\_\_\_\_\_

24. PENNSYLVANIA CERTIFICATIONS/LICENSES:

Project designer: N/A Certification #: \_\_\_\_\_  
Contractor (Individual): \_\_\_\_\_ Certification #: \_\_\_\_\_  
Supervisor: \_\_\_\_\_ Certification #: \_\_\_\_\_  
Contractor (Firm) \_\_\_\_\_ Certification #: \_\_\_\_\_

**\*\*\*\*\* SIGN BOTH STATEMENTS \*\*\*\*\***

25. I HEREBY CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF 40 CFR PART 61 SUBPART M (if applicable) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING ALL WORKING HOURS, AND I CERTIFY THAT ALL WORK WILL BE DONE IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL AGENCY RULES AND REGULATIONS.

\_\_\_\_\_  
(Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

26. I HEREBY CERTIFY THAT THE FOREGOING STATEMENTS AND THE INFORMATION CONTAINED IN THIS NOTIFICATION FORM ARE TRUE. THIS CERTIFICATION IS MADE SUBJECT TO THE PENALTIES SET FORTH IN 18 PA C.S. §4904 RELATING TO UNSWORN FALSIFICATION TO AUTHORITIES.

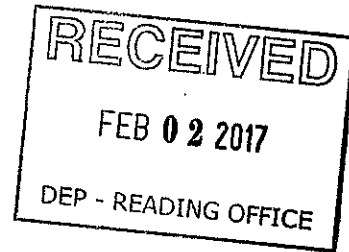
\_\_\_\_\_  
(Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

**FOR OFFICIAL USE ONLY**



# Kiewit



February 1, 2017

Mr. William R. Borst  
Air Quality District Supervisor  
Pennsylvania Department of Environmental Protection Reading  
District Office  
1005 Crossroads Boulevard  
Reading, PA 19605

**RE: Non-Notification of Demolition  
1 Armorcast Boulevard, Birdsboro, Berks County**

Letter No.: KPC-DEP-001

Dear Mr. Borst:

We are in receipt of your Notice of Violation dated January 18, 2017. This notification was received in our office on Wednesday, January 25, 2017.

We recognize and respect the agency's interpretation of the regulation, 40 CFR Part 61 Section 61.145(b)(3)(i), which requires notification for demolition of facilities.

The decision not to notify the department regarding the demolition of stacks was due to our contractor's misinterpretation relating to the NESHAP definition of *Facilities* referenced in 40 CFR 61.141. EIG did not believe the regulation applied to the stacks in part because stacks alone would not constitute a *facility* and was in receipt of sampling results which indicated no asbestos containing materials were present in the stacks.

Once alerted to the PA DEP's request for a notification on December 8, 2016, the project's contractor immediately suspended demolition activity and submitted the appropriate paperwork to the EPA and PA DEP. It was only after direction from the PA DEP Bureau of Mining Programs to proceed with demolition "as soon as possible", due to the agency perceiving an unsafe condition, that demolition was completed. There is nothing more important to us as a company than the safety of our contractors, all site personnel, and the surrounding community. Please see attached copy of the PA DEP Bureau of Mining Programs Explosives Inspection Report dated December 9, 2016.

To assure future compliance with the regulations, Kiewit Power Constructors' contractor, EIG, has implemented the following corrective measures.



# Kiewit

1. Submit a revised Notification Form that indicates the actual date that demolition of the stacks was begun and completed. The revised Notification Form is attached.
2. Submit a Notification Form for the remaining structures at the Birdsboro Power facility at least 10 working days in advance of demolition activities. The facility encompasses multiple structures that will be abated and demolished. PA DEP will be notified and updated as to the actual demolition dates of individual structures.
3. Update Kiewit's Site Specific Environmental Plan to require that notification is made at least 10 working days in advance for ALL demolition activities.
4. Provide training to all project staff personnel on the demolition notification requirements. Training was provided the week of January 16<sup>th</sup> to staff currently assigned to the project.

To assure regulatory compliance in the future, Kiewit Power Constructors has instructed our contractor(s) to submit timely notifications prior to any demolition and/or asbestos remediation work the project anticipates moving forward. If there are any questions that may arise pertaining to regulatory interpretation, project personnel will contact the PA DEP for clarification.

If you would like to discuss this Notice of Violation and the project's corrective measures, we would be happy to meet with you at your convenience.

Sincerely,

Brian Stenstrom

Project Manager

cc: Jim Berra  
Power Plant Management Services, LLC  
1155 Dairy Ashford, Suite 500  
Houston, TX 77079

Norm Decastro  
Kiewit Power Constructors  
Via Email

Jim Ryan  
Power Plant Management Services, LLC  
Via Email

**KIEWIT POWER CONSTRUCTORS CO.**  
9401 Renner Boulevard, Lenexa, KS 66219  
(913) 928-7800 (913) 689-4800 fax

**ASBESTOS ABATEMENT AND DEMOLITION/RENOVATION NOTIFICATION FORM**

**For Official Use Only**

Date Received 1

Date Received 2

Postmark Date: \_\_\_\_\_

Project ID#: \_\_\_\_\_

Permit #: \_\_\_\_\_

Other #: \_\_\_\_\_

Inspector: \_\_\_\_\_

NOTICE: This is not a valid asbestos abatement notification for the purposes of the Asbestos Occupations Accreditation and Certification Act unless individuals and contractors have met the certification requirements as set forth in the Asbestos Occupations Accreditation and Certification Act, Act of 1990, P.L. 805, No. 194 (63 P.S. Sections 2101-2112).

REFER TO THE ATTACHED INSTRUCTIONS FOR INFORMATION AND REQUIREMENTS.

1.	TYPE OF NOTIFICATION (check one): <input checked="" type="checkbox"/> Revision (highlight here, and changes) <input type="checkbox"/> Postponement Date of Initial Notification or, if previously revised, date of last revision: <u>12/8/2016</u>	<input type="checkbox"/> Initial <input type="checkbox"/> Phase of Annual Notification <input type="checkbox"/> Annual Notification <input type="checkbox"/> Cancellation
2.	PROJECT LOCATION (check one): <input type="checkbox"/> Allegheny County <input type="checkbox"/> City of Philadelphia <input checked="" type="checkbox"/> Other Location in PA (specify county): <u>Berks</u>	
3.	For Allegheny County and City of Philadelphia projects only: A. Does this project require a permit? <input type="checkbox"/> Yes <input type="checkbox"/> No (If Yes is checked, a permit application must be submitted along with this notification and approved prior to the start of the project.) B. For City of Philadelphia projects requiring a permit: Asbestos project inspector: _____ Certification #: _____ Company name: _____ Address: _____ City: _____ State: _____ Zip: _____ Phone: _____	
4.	WILL ALTERNATIVE METHODS TO ANY OF THE APPLICABLE REGULATIONS BE USED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If Yes is checked, approval must be obtained prior to the start of the project. Please contact the appropriate DEP regional office or local government agency (see reverse of Instruction Sheet for contact list).	
5.	TYPE OF OPERATION (check one): <input checked="" type="checkbox"/> Demolition <input type="checkbox"/> Ordered Demolition <input type="checkbox"/> Abatement prior to Demolition <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation	
6.	FACILITY DESCRIPTION:    Job No.: <u>E0-02</u> (see instructions) Facility Name: <u>Birdsboro Energy Center</u> Street/Rural Address: <u>1 Armorcast Road</u> City: <u>Birdsboro</u> State: <u>PA</u> Zip Code: <u>19058</u> Present use: <u>Abandoned</u> Prior use: <u>Chimney</u> Will the facility be occupied during the abatement activity? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Facility size in square feet: <u>12' x 165'</u> # of floors: _____    Age in years: <u>75</u>	
7.	ABATEMENT CONTRACTOR: Company name: <u>N/a</u> Allegheny County or City of Philadelphia License # (if applicable): _____ Street/Rural/POB Address: _____ City: _____ State: _____ Zip: _____ Contact: _____ Telephone No. (between 8:00 & 4:30): _____	

8. DEMOLITION CONTRACTOR:  
 Company name: Environmental and Infrastructure Group  
 Street/Rural/POB Address: 204 Mill Street, Suite 102  
 City: Bristol State: PA Zip: 19007  
 Contact: Edmund C Vernier Jr. Telephone No. (between 8:00 & 4:30): 215-458-7602

9. FACILITY OWNER:  
 Owner name: Birdsboro Power, LLC  
 Street/Rural/POB Address: 1 Armorcast Road.  
 City: Birdsboro State: PA Zip: 19508  
 Contact: Robert Haley Telephone No. (between 8:00 & 4:30): 860-301-2620

10. FACILITY INSPECTION (required for renovation and demolition projects):  
 Building inspector: Brian Rosini Certification # ACC-04 16-6-011  
 Date of inspection: 05/26/2016 Is any material assumed to be asbestos?  Yes  No  
 Procedure, including analytical method, if appropriate, used to detect the presence of asbestos material:  
PLM bulk

Building is ID and in danger of collapse. An asbestos investigator will be on site during demolition. (Philadelphia only)

11. IS ANY TYPE OF ASBESTOS PRESENT  Yes  No If Yes, please list in #12

12. TYPE OF ACM, DESCRIPTION & LOCATION OF MATERIAL, APPROXIMATE AMOUNT OF ACM, TYPE OF ABATEMENT AND FINAL AIR CLEARANCE METHOD.  
 PROVIDE INFORMATION IN THE SPACES BELOW, THEN CONTINUE ON ANOTHER SHEET, IF NECESSARY, USING THE SAME FORMAT.

Code *	Description of material	Location of material (room/floor/area)	Amount of ACM	Code **	Code ***	Code ****
n/a	n/a	n/a	n/a	n/a	n/a	n/a

Code *	Code **	Code ***	Code ****
Type of ACM	Units	Type of abatement	Final Clearance
FRI - Friable ACM	LF - Linear ft.	REM - Removal	PCM - Phase contrast microscopy
NF1 - Cat I nonfriable ACM	SF - Square ft.	CAP - Encapsulation	TEM - Transmission electron microscopy
NF2 - Cat II nonfriable ACM	CF - Cubic ft.	CLO - Enclosure	
(Note: Allegheny County treats all ACM as friable)		NON - None	

13. Is this project regulated by NESHAP  Yes  No  
 A project that includes the demolition of any defined "facility" is regulated by NESHAP. A renovation project is also regulated by NESHAP when the amounts of friable ACM, or ACM that may be rendered friable, are as follows: 260 LF or 160 SF or 35 CF.



14. OPERATION SCHEDULE(S) (as applicable)

- A. Asbestos abatement: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_ am \_\_\_\_\_ pm to \_\_\_\_\_ am \_\_\_\_\_ pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- B. Demolition: Start Date: 12/09/2016 Completion Date: 12/09/2016  
 Daily hours of operation: 6:00 am  pm to 4:30 am  pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su
- C. Renovation: Start Date: \_\_\_\_\_ Completion Date: \_\_\_\_\_  
 Daily hours of operation: \_\_\_\_\_ am \_\_\_\_\_ pm to \_\_\_\_\_ am \_\_\_\_\_ pm  
 Days of week (check)  Mo  Tu  We  Th  Fr  Sa  Su

COMMENTS:

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15. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK:

Fell (4) abandoned brick chimneys (stacks) via use of controlled explosives

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16. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO REMOVE ACM AND TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION AND RENOVATION SITE:

N/A

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17. WASTE TRANSPORTER(S)

- A. Transporter #1 name: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. Transporter #2 name: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

18. WASTE DISPOSAL SITE(S): (any asbestos containing material)

- A. Landfill name: n/a DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. Landfill name: \_\_\_\_\_ DEP permit #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

19. AIR MONITORING FIRM(S)

- A. Company name/individual: n/a  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. Final clearance firm: (if different than 19A) \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- Final clearance firm was hired by (check one)  Contractor  Owner  
 Other Explain \_\_\_\_\_

20. AIR SAMPLE FIRM(S) (City of Philadelphia projects only)

- A. PCM company name/individual: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_
- B. TEM company name: \_\_\_\_\_ Certification #: \_\_\_\_\_  
 Street/Rural Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Contact: \_\_\_\_\_ Telephone: \_\_\_\_\_

21. FOR EMERGENCY RENOVATIONS:

Date of emergency (mm/dd/yy): \_\_\_\_\_ Hour of emergency: \_\_\_\_\_  am  pm

Description of the sudden, unexpected event:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden as a consequence of complying with the 10 working day notification requirement:

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

22. FOR ORDERED DEMOLITIONS (attach copy of order):

Government agency that ordered: \_\_\_\_\_  
Name of individual who ordered: \_\_\_\_\_ Title: \_\_\_\_\_  
Date of order (mm/dd/yy): \_\_\_\_\_ Date ordered to begin (mm/dd/yy): \_\_\_\_\_

23. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES CRUMBLED, PULVERIZED, OR REDUCED TO POWDER:  
Stop work immediately & have suspect material sampled.

\_\_\_\_\_  
\_\_\_\_\_

24. PENNSYLVANIA CERTIFICATIONS/LICENSES:

Project designer: N/A Certification #: \_\_\_\_\_  
Contractor (Individual): \_\_\_\_\_ Certification #: \_\_\_\_\_  
Supervisor: \_\_\_\_\_ Certification #: \_\_\_\_\_  
Contractor (Firm) \_\_\_\_\_ Certification #: \_\_\_\_\_

**\*\*\*\*\* SIGN BOTH STATEMENTS \*\*\*\*\***

25. I HEREBY CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF 40 CFR PART 61 SUBPART M (if applicable) WILL BE ON-SITE DURING THE DEMOLITION OR RENOVATION AND EVIDENCE THAT THE REQUIRED TRAINING HAS BEEN ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION DURING ALL WORKING HOURS, AND I CERTIFY THAT ALL WORK WILL BE DONE IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL AGENCY RULES AND REGULATIONS.

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(Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

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\_\_\_\_\_  
(Original Signature of Owner/Operator) 1/10/17 (Date)

Printed Name of Owner/Operator: Michael Duffy Title: Vice President

**FOR OFFICIAL USE ONLY**



OFFICIAL USE ONLY

Date 12/9/16

# EXPLOSIVES INSPECTION REPORT

(TYPE: EXPLO)

<b>Name:</b> Controlled Demolition Inc.	<b>Municipality/Township:</b> Birdsboro Borough	<b>License/Permit</b>	<b>Program</b>	<b>Inspected Entity</b>	<b>ENF Type</b>	<b>IRC</b>
<b>Address:</b> 13401 Still Haven Ct. Phoenix, MD 31131	<b>County:</b> Berks	BAP#06165004	MEX	SITE		NOVIO
	<b>Blaster's Name:</b> Tom Doud	SMP				
<b>Telephone:</b> 410-667-6610	<b>Blasters License:</b> BL-7094	BL				
	<b>Weather:</b>	SP				
<b>Contract Blaster:</b>	<b>Wind Direction:</b>	PP				
<b>Address:</b>	<b>Site Name:</b> Felling of 4 Brick Chimneys	<b>Longitude:</b>	<b>Permit Status:</b> active			
	<b>Complaint ID:</b>	<b>Latitude:</b>	<b>Inspection Result:</b> NOVIO - inspection of proposed blasting.			

Remarks: On December 8, 2016 DEP District Mining Operations Pottsville received a notification from Tom Doud (CDI) that 2 of the 4 approx 165' chimney stacks were loaded at the old "Armorcast" plant under permit #06165004. He stated that they had been ceased by DEP Air Quality for failure to file an asbestos analysis that warrants a ten day notice under Article III Air Resources. While on site December 9, 2016 a determination has been made by DEP District Mining Operations that the operator has created an unsafe or potentially unsafe condition: as they have proceeded to load a shot and not initiate/fire the shot. This loaded shot creates or constitutes an unsafe condition in that the shot could be initiated in an uncontrolled or accidental manner. Therefore, the Department is requiring that the shots be initiated/fired as soon as possible. Additionally, a determination has been made that the other 2 chimneys not yet loaded will be loaded and fired; consistent with the original plan. No violations.

<b>Person contacted (please print)</b> Tom Doud	<b>Title</b> blaster	<b>Times-On-Site</b> _____ to _____	<b>Page 1 of _____</b>					
<b>Blasting Inspector</b> Michael Duke		<b>ID#</b>	6	4	4	1	3	6
<b>Accompanied By</b>		<b>ID#</b>						

The responsible party signature acknowledges that he/she has read the report, including the reverse side, and that he/she was given the opportunity to discuss it with the investigator. The signature does not necessarily mean he/she agrees with the report.

- White - District File
- Yellow - Operator
- Pink - Blasting Insp.
- Goldenrod - SMCI/Other

## Enforcement Codes

CESSATION ORDER	CESOR
COMPLIANCE ORDER	CMPOR
CESSATION ORDER-FAILURE TO ABATE	COFTA
NOTICE OF VIOLATION	NOV
SUMMARY CITATION	SUMM
MISDEMEANOR	MIS
ORDER-TIME EXTENTION	TIMEX
PERMIT SUSPENSION	SUSPM
PERMIT REVOCATION	REVPM
THIRD PARTY RESOLUTION	3PRTY

## Inspection Result Codes

IN COMPLIANCE WITH SCHEDULE	ICS
NO VIOLATIONS NOTED	NOVIO
NO VIOLATIONS-FAC INACTIVE FOR INSPECTION	NVFIA
NO VIOLATIONS-PERMANENTLY SHUT DOWN	NVPSD
OUTSTANDING VIOLATIONS-NO VIOLS REQ	OUTNO
OUTSTANDING VIOLATIONS-VIOLS REQ'D	OUTST
PENDING	PEND
RECURRING VIOLATIONS	RECUR
VIOL(S) NOTED & IMMEDIATELY CORRECTED	VIOIC
VIOLATION(S) NOTED	VIOLS
VIOLATION(S)-&REGURRING-VIOLATIONS	VRV

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## Inspected Entity Codes

PRIMARY FACILITY (MINING PERMITS)	PF
SITE (BAP'S)	SITE
CLIENT (BL'S, PP'S, SP'S)	CLNT

## Program Codes

COAL MINING	MCM
NON-COAL MINING	MIM
NON-MINING	MEX