STATE OF DELAWARE
EXECUTIVE DEPARTMENT
OFFICE OF STATE PLANNING COORDINATION

June 23, 2015

Mr. Keith Rudy
Landmark Science and Engineering
100 W. Commons Blvd. Suite 301
New Castle, DE 19720

RE: PLUS review 2015-05-03, Delaware National Guard

Dear Keith,

Thank you for meeting with State agency planners on May 27, 2015 to discuss the proposed plans for the Delaware National Guard. According to the information received, you are seeking a review of a rezoning of 9.42 acres from Medium Density Residential to Light Industrial along Armory Road within the Town of Dagsboro. In addition, we have reviewed you concept site plan for the replacement of the existing 10,000 sq. ft. maintenance facility with a new vehicle maintenance facility.

Please note that changes to the plan, other than those suggested in this letter, could result in additional comments from the State. Additionally, these comments reflect only issues that are the responsibility of the agencies represented at the meeting. **The developers will also need to comply with any Federal, State and local regulations regarding this property. We also note that as Sussex County is the governing authority over this land, the developers will need to comply with any and all regulations/restrictions set forth by the County**

Strategies for State Policies and Spending

This project is located in Investment Level 2 according to the *Strategies for State Policies and Spending.* Investment Level 2 reflects areas where growth is anticipated by local, county, and State plans in the near term future.

According to the Future Land Use map within the 2009 Dagsboro Comprehensive Plan, this parcel is proposed for Residential. When the parcel was annexed in 2011, it was annexed as residential. In order to change the zoning of this parcel, the Town of Dagsboro would need to submit a comprehensive plan amendment to change the Future Land Use to Commercial. The Town can contact this office for additional information on this comprehensive plan amendment.

Code Requirements/Agency Permitting Requirements

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Any changes to the site access on Armory Road must be designed in accordance with DelDOT's Development Coordination Manual (formerly the Standards and Regulations for Subdivision Streets and State Highway Access), which is available at http://www.deldot.gov/information/business/subdivisions/changes/index.shtml.

- Under 17 Del. C. §146, the proposed building demolition and replacement requires a DelDOT Entrance Permit Application (EPA). As submitted, the PLUS application does not specify the existing or proposed Average Daily Traffic (ADT) volume using the site access on Armory Road. However, this volume is essential for DelDOT in determining how to treat the proposed development. Expedited processing, in accordance with Section P.6 or P.7 of the Development Coordination Manual may be possible but DelDOT will need to know volumes to make that determination. To advance the proposed development, the applicant's engineer should submit a completed EPA in accordance with Sections P.3 and P.4 of the Manual. Questions regarding the EPA process may be directed to the DelDOT Subdivision Manager for this part of Sussex County, Mr. John Fiori, at (302) 760-2260 or the Sussex County Review Coordinator, Mr. Steve Sisson at (302) 760-2553. Questions specific to trip generation may be directed to Mr. Bill Brockenbrough at (302) 760-2109.

- As necessary, in accordance with Section 3.2.5 and Figure 3.2.5-a of the Development Coordination Manual, DelDOT will require dedication of right-of-way along the site's frontage on Armory Road. By this regulation, this dedication is to provide a minimum of 40 feet of right-of-way from the road centerline. The following right-of-way dedication note is required, "**An X-foot wide right-of-way is hereby dedicated to the State of Delaware, as per this plat.**"

- In accordance with Section 3.2.5.1.2 of the Development Coordination Manual, DelDOT will require the establishment of a 15-foot wide permanent easement across the property frontage on Armory Road. The location of the easement shall be outside the limits of the ultimate right-of-way. The easement area can be used as part of the open space calculation for the site. The following note is required, "**A 15-foot wide permanent easement is hereby established to the State of Delaware, as per this plat.**"

- Referring to Section 3.4.2.1 of the Development Coordination Manual, the following items, among other things, are required on the Record Plan:

    - A Traffic Generation Diagram. See Figure 3.4.2-a for the required format and content.
    - Depiction of all existing entrances within 300 feet of the proposed entrance.

- Referring to Section 3.5.4.2 of the Development Coordination Manual, all projects located in Level 2 Investment Areas relative to the Strategies for State Policies and Spending that need Entrance Plan Approval are required to install a shared-use path or sidewalk along the State-maintained road frontage if the project abuts an existing facility. A fee in lieu of construction may be accepted if construction is physically impossible but DelDOT sees no reason why construction cannot occur in this instance. The developer of Vines Creek Village is required to install a five-foot wide sidewalk along their property frontage. This site will be required to connect to that pedestrian facility.

- If no entrance improvements are warranted, then only a "Letter of No Objection" will be required. In accordance with Section 3.4 of the Development Coordination Manual, a record plan shall be prepared prior to issuing "Letter of No Objection". The following information will be required for the "Letter of No Objection" review:

    - Copy of the Initial Stage Fee Calculation Form
    - Copy of the Initial Stage Review Fee
    - Gate-Keeping Checklist – Site Plan
    - Sight Distance Spreadsheet
    - Design Checklist – Record Plan*
    - Owners and Engineer's name and e-mail address
    - Three (3) paper sets of the Record Plan
    - CD with a pdf of the Record Plan

  *For the design checklist for the Record Plan, please refer to the Development Coordination Manual, Appendix D, Plan Review Checklist.

- Referring to Section 3.4.1 of the Development Coordination Manual, because the proposed development would generate more than 200 vehicle trips per day, a Pre-Submittal Meeting is required before plans are submitted for review. The form needed to request this meeting is available http://www.deldot.gov/information/business/subdivisions/Meeting_Request_Form.pdf.

- Referring to Section 3.4.2 of the Development Coordination Manual, the Initial Stage review fee shall be assessed to this project.

- If entrance improvements are required, then entrance plan approval will be required. Referring to Section 4.3 of the Development Coordination Manual, an entrance plan shall be prepared prior to issuing entrance approval. The following information will be required for Entrance Plan review:

    - Copy of the Construction Stage Fee Calculation Form
    - Copy of the Construction Review Fee
    - Gate-Keeping Checklist – Entrance Plan
    - Auxiliary Lane Spreadsheet
    - Design Checklist – Entrance Plan**

- Pipe/Angle Spreadsheet (if applicable)
- Three (3) paper sets of the Entrance Plan
- SWM Report and Calculations (if applicable)
- CD with a pdf of the Entrance Plan

**For the design checklist for the entrance plan, please refer to the Development Coordination Manual, Appendix D, Plan Review Checklist.

- Again if entrance improvements are required, then referring to Section 4.3 of the Development Coordination Manual, the Construction Stage review fee shall be assessed to this project.

Department of Natural Resources and Environmental Control – Contact Kevin Coyle 739-9071

TMDLs

- The project is located in the high *nutrient reduction* zone of the greater Inland Bays watershed. In this watershed, Total Maximum Daily Load (TMDL) pollutant reduction targets have been developed by the State of Delaware (under the auspices of Section 303(d) of the 1972 Federal Clean Water Act) for nutrients (e.g., nitrogen, phosphorus), and bacteria. A TMDL is the maximum level of pollution allowed for a given pollutant below which a "water quality limited waterbody" can assimilate and still meet State water quality standards (e.g., dissolved oxygen, nutrients, and bacteria; *State of Delaware Surface Water Quality Standards, as amended July 11, 2004*) to the extent necessary to support use goals such as, swimming, fishing, drinking water and shell fish harvesting. The TMDL for the high *nutrient reduction zone* of the Inland Bays watershed calls for 85 percent reduction in nitrogen and a 65 percent reduction in phosphorus, both from baseline conditions. The TMDL also calls for a 40 percent reduction (17 percent for marine waters) in bacteria from baseline conditions. The TMDL reduction requirements, supporting documents, and technical analysis can viewed in the following web link:
- http://www.dnrec.delaware.gov/swc/wa/Pages/WatershedAssessmentTMDLs.aspx

- The Inland Bays Pollution Control Strategy (PCS) and the accompanying regulations were finalized by order of the DNREC Secretary on October 2008. These regulations can be reviewed at the Inland Bays PCS regulations and background information about the PCS can be reviewed in the following web link:
  http://www.dnrec.delaware.gov/swc/wa/Pages/InlandBaysPCS.aspx

Water Supply

- The information provided indicates that the Town of Dagsboro will provide water to the proposed project through a public water system. DNREC files reflect that the Town of Dagsboro does not currently hold a Certificate of Public Convenience and Necessity (CPCN) to provide public water in these areas. They will need to file an application for a CPCN with the Public Service Commission, if they have not done so already. Information on CPCN requirements and applications can be obtained by contacting the Public Service Commission at 302-736-7547. Should an on-site public well be needed, a minimum isolation distance of

150 feet is required between the well and any potential source of contamination, such as a septic tank and sewage disposal areas, and at least 150 feet from the outermost boundaries of the project. The Division of Water Resources will consider applications for the construction of on-site wells provided the wells can be constructed and located in compliance with all requirements of the Regulations Governing the Construction and Use of Wells. A well construction permit must be obtained prior to constructing any wells.

- Should dewatering points be needed during any phase of construction, a dewatering well construction permit must be obtained from the Water Supply Section prior to construction of the well points. In addition, a water allocation permit will be needed if the pumping rate will exceed 50,000 gallons per day at any time during operation.

- All well permit applications must be prepared and signed by licensed water well contractors, and only licensed well drillers may construct the wells. Please factor in the necessary time for processing the well permit applications into the construction schedule. Dewatering well permit applications typically take approximately four weeks to process, which allows the necessary time for technical review and advertising.

Sediment and Stormwater Management

- A detailed Sediment and Stormwater Management Plan must be approved prior to beginning construction. The plan must comply with the current Delaware Sediment and Stormwater Regulations.

- A Notice of Intent (NOI) for Stormwater Discharges Associated with Construction Activity must be submitted along with NOI fee to DNREC Division of Watershed Stewardship prior to Sediment and Stormwater Plan approval. Once the construction activity is complete, as-builts have been approved, and final stabilization is established on the site, a Notice of Termination (NOT) may be submitted to terminate permit coverage for the construction activity.

- Initially, a Stormwater Assessment Study (SAS) must be completed for the project site and submitted to DNREC Sediment and Stormwater Program. Once a complete SAS has been submitted, a project application meeting will be scheduled. At the project application meeting the methods for compliance with the Sediment and Stormwater Regulations will be discussed and submittal requirements, analysis points, and BMPs to pursue will be agreed upon.

Tank Management Section

- If a release of a Regulated Substance occurs at the proposed project site, compliance of 7 Del.C. Chapter 60, 7 Del.C., Chapter 74 and DE Admin. Code 1351, State of Delaware Regulations Governing Underground Storage Tank Systems (the UST Regulations) is required.

The following confirmed leaking underground storage tank (LUST) project is located within the boundary of the project parcel area:
Dagsboro State OMS 5 Armory, Facility: 5-000092, Projects: S9301002, S9703042, S9910207 (All Inactive). Related to gasoline, diesel, used oil and heating fuel releases.

The following confirmed leaking underground storage tank (LUST) projects are located within a quarter mile from the proposed project area:

- Murray Motors Inc, Facility: 5-000646, Project: S9209224 (Inactive)
- Rusts Motor Service, Facility: 5-000448, Project: S9309174 (Inactive)

- No environmental impacts are anticipated; however, per the UST Regulations: Part E, § 1. Reporting Requirements:

- Any indication of a Release of a Regulated Substance that is discovered by any Person, including but not limited to environmental consultants, contractors, utility companies, financial institutions, real estate transfer companies, UST Owners or Operators, or Responsible Parties shall be reported within 24 hours to:

  - The Department's 24-hour Release Hot Line by calling 800-662-8802; and
  - The DNREC Tank Management Branch by calling 302-395-2500

Air Quality

- The applicant shall comply with all applicable Delaware air quality regulations. Please note that the following regulations in Table 1 – Potential Regulatory Requirements may apply to your project:

Table 1: Potential Regulatory Requirements

Regulation	Requirements
7 DE Admin. Code 1106 - Particulate Emissions from Construction and Materials Handling	• Use dust suppressants and measures to prevent transport of dust off-site from material stockpile, material movement and use of unpaved roads. • Use covers on trucks that transport material to and from site to prevent visible emissions.
7 DE Admin. Code 1113 – Open Burning	• Prohibit open burns statewide during the Ozone Season from May 1-Sept. 30 each year. • Prohibit the burning of land clearing debris. • Prohibit the burning of trash or building materials/debris.

7 DE Admin. Code 1135 – Conformity of General Federal Actions to the State Implementation Plan	• Require, for any "federal action," a conformity determination for each pollutant where the total of direct and indirect emissions would equal or exceed any of the de minimus levels (See Section 3.2.1)
7 DE Admin. Code 1141 – Limiting Emissions of Volatile Organic Compounds from Consumer and Commercial Products	• Use structural/ paint coatings that are low in Volatile Organic Compounds. • Use covers on paint containers when paint containers are not in use.
7 DE Admin. Code 1144 – Control of Stationary Generator Emissions	• Ensure that emissions of nitrogen oxides (NO_x), non-methane hydrocarbons (NMHC), particulate matter (PM), sulfur dioxide (SO_2), carbon monoxide (CO), and carbon dioxide (CO_2) from emergency generators meet the emissions limits established. (See section 3.2). • Maintain recordkeeping and reporting requirements.
7 DE Admin. Code 1145 – Excessive Idling of Heavy Duty Vehicles	• Restrict idling time for trucks and buses having a gross vehicle weight of over 8,500 pounds to no more than three minutes.

For a complete listing of all Delaware applicable regulations, please look at our website: http://www.awm.delaware.gov/AQM/Pages/AirRegulations.aspx.

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

Fire Protection Water Requirements:

- Water distribution system capable of delivering at least 1000 gpm for 1-hour duration, at 20-psi residual pressure is required. Fire hydrants with 800 feet spacing on centers.
- Where a water distribution system is proposed for places of assembly and business sites, the infrastructure for fire protection water shall be provided, including the size of water mains for fire hydrants and sprinkler systems.

Fire Protection Features:

- All structures over 10,000 sq. ft. aggregate will require automatic sprinkler protection installed.
- Buildings greater than 10,000 sq. ft., 3-stories or more, over 35 feet, or classified as High Hazard, are required to meet fire lane marking requirements
- Show Fire Department Connection location (Must be within 300 feet of fire hydrant), and detail as shown in the DSFPR.
- Show Fire Lanes and Sign Detail as shown in DSFPR

Accessibility:

- All premises, which the fire department may be called upon to protect in case of fire, and which are not readily accessible from public roads, shall be provided with suitable gates and access roads, and fire lanes so that all buildings on the premises are accessible to fire apparatus.
- Any dead end road more than 300 feet in length shall be provided with a turn-around or cul-de-sac arranged such that fire apparatus will be able to turn around by making not more than one backing maneuver.
- The use of speed bumps or other methods of traffic speed reduction must be in accordance with Department of Transportation requirements.
- The local Fire Chief, prior to any submission to our Agency, shall approve in writing the use of gates that limit fire department access into and out of the development or property.

Gas Piping and System Information

- Provide type of fuel proposed, and show locations of bulk containers on plan.

Required Notes:

- Provide a note on the final plans submitted for review to read " All fire lanes, fire hydrants, and fire department connections shall be marked in accordance with the Delaware State Fire Prevention Regulations"
- Proposed Use
- Alpha or Numerical Labels for each building/unit for sites with multiple buildings/units
- Square footage of each structure (Total of all Floors)
- National Fire Protection Association (NFPA) Construction Type
- Maximum Height of Buildings (including number of stories)
- Note indicating if building is to be sprinklered
- Name of Water Provider
- Letter from Water Provider approving the system layout
- Provide Lock Box Note (as detailed in DSFPR) if Building is to be sprinklered
- Provide Road Names, even for County Roads

State Historic Preservation Office – Contact Terrence Burns 736-7404

- There are no known archaeological sites, or National Register-listed property on this parcel. Furthermore, if there is any federal involvement with the project, in the form of licenses, permits, or funds, the federal agency, often through its client, is responsible for complying with Section 106 of the National Historic Preservation Act (36 CFR 800) and must consider their project's effects on any known or potential cultural or historic resources. Owners and developers who may plan to apply for an Army Corps of Engineers permit or for federal funding, such as HUD or USDA grants, should be aware of the National Historic Preservation Act of 1966 (as amended). Regulations promulgated for Section 106 of this Act stipulate that no ground-disturbing or demolition activities should take place before the Corps or other involved federal agency determines the area of potential effect of the project undertaking. These stipulations are in place to allow for comment from the public, the Delaware State Historic Preservation Office, and the Advisory Council for Historic Preservation about the project's effects on historic properties. Furthermore, any preconstruction activities without adherence to these stipulations may jeopardize the issuance of any permit or funds. If you need further information or additional details pertaining to the Section 106 process and the Advisory Council's role, please review the Advisory Council's website at www.achp.gov.

Recommendations/Additional Information

This section includes a list of site specific suggestions that are intended to enhance the project. These suggestions have been generated by the State Agencies based on their expertise and subject area knowledge. **These suggestions do not represent State code requirements.** They are offered here in order to provide proactive ideas to help the applicant enhance the site design, and it is hoped **(but in no way required)** that the applicant will open a dialogue with the relevant agencies to discuss how these suggestions can benefit the project.

Department of Transportation – Contact Bill Brockenbrough 760-2109

- Please use the Auxiliary Lane Worksheet to determine whether auxiliary lanes are warranted at the site entrance. The worksheet can be found at http://www.deldot.gov/information/business/subdivisions/auxiliary_lane_worksheet.xls.

- Please be advised DelDOT's check handling procedures changed in 2012. For specific information, see the letter available at http://www.deldot.gov/information/business/subdivisions/PaymentProcedure.pdf.

- Be advised that the Standard General Notes have been updated and posted to the DelDOT website. Please begin using the new versions and look for the revision date of May 21, 2014. The notes can be found at http://www.deldot.gov/information/business/subdivisions/DelDOT_Development_Coordination_Plan_Sheet_Notes.doc

- The applicant should expect a requirement that all PLUS and/or TAC comments be addressed prior to submitting record, subdivision or entrance plans for review.

- Please check to determine whether any utilities will need to be relocated as part of this project.

Department of Natural Resources and Environmental Control – Contact Kevin Coyle 739-9071

Soils Assessment

- Based on soils survey mapping update, the only soil mapping unit of concern is the somewhat poorly-drained Klej. Klej is a transitional soil mapping unit that may or may not contain wetland associated (hydric) soil components (Figure 1). DNREC strongly recommends a site-specific evaluation of these soils by a licensed Class D soil scientist to confirm the presence or absence of hydric soils.

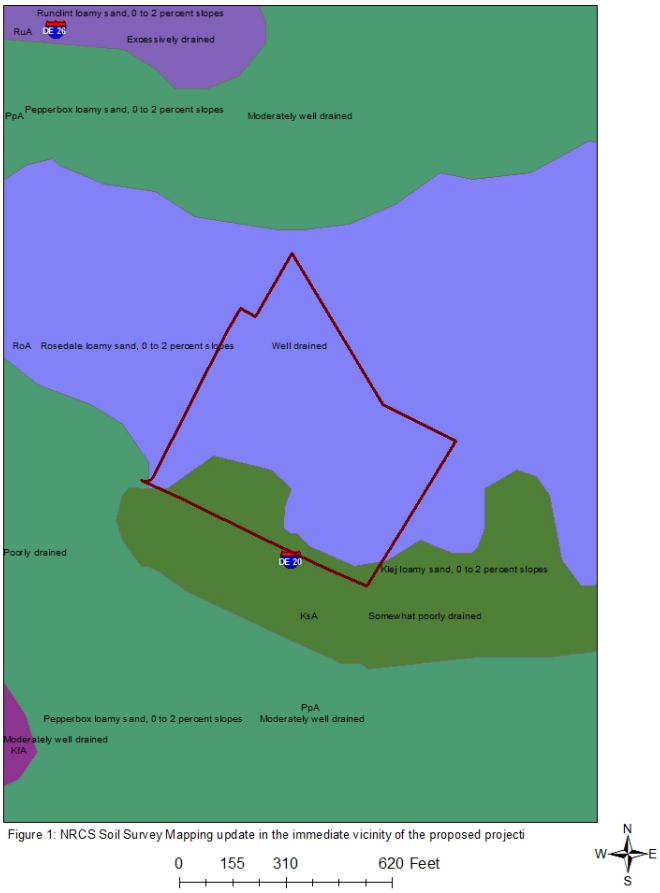

Figure 1: NRCS Soil Survey Mapping update in the immediate vicinity of the proposed projecti

Additional information on TMDLs and water quality

- Compliance with the specified TMDL nutrient and bacterial reduction requirements specified for the Inland Bays watershed can be facilitated by the strategies and requirements described in the Inland Bays PCS, and the implementation/adherence to the following recommended BMPs:

  Retain as much of the existing open space as possible on this parcel; DNREC further suggests additional native tree and native herbaceous planting wherever possible.

  Calculate post-construction surface imperviousness with all forms of created (or constructed) surface imperviousness (e.g., rooftops, driveways, parking lots, sidewalks, open-water storm water management structures, ponds, and roads) included in the calculation. Using open-water management structures and/or ponds as part of calculation for open space will result in an underestimate of actual post-construction surface imperviousness, and is not considered an acceptable best management practice.

  Since this project will create additional surface imperviousness that will increase the probability for increased flooding and increased pollutant load runoff impacts to adjoining streams and wetlands in the greater Inland Bays watershed we strongly encourage, wherever practicable, the use of pervious paving materials (instead of conventional asphalt and concrete) to mitigate these impacts. This will reduce the potential for on-site and off-site flooding events while reducing the volume of pollutant-laden runoff ultimately draining to local waterways and wetlands in the greater Inland Bays watershed. DNREC suggests that the applicant use pervious paving materials in all parking areas and consider the use of pervious pavers in roadways as well.

  Use of rain gardens, as a BMP(s) to mitigate or reduce nutrient and bacterial pollutant impacts via runoff/discharges from impervious surfaces. Please contact Lara Allison for information about the possibility for siting a rain garden(s) in this parcel. Lara can be contacted by phone at 739-9922.

  Voluntarily assess nutrient and bacterial pollutant loading at the preliminary project design phase. To this end, the Watershed Assessment Section has developed a methodology known as the "Nutrient Load Assessment protocol." The protocol is a tool used to assess changes in nutrient loading (e.g., nitrogen and phosphorus) resulting from the conversion of individual or combined land parcels to a changed land use(s); thus providing applicants and governmental entities with quantitative information about the project's impact(s) on baseline water quality. DNREC strongly encourages the applicant/developer use this protocol to help them design and implement the most effective BMPs. Please contact Jen Walls or John Martin at (Division of Watershed Stewardship) at 302-739-9939 for more information on the protocol.

Additional information on tank management.

- When contamination is encountered, PVC pipe materials should be replaced with ductile steel and nitrile rubber gaskets in the contaminated areas.

- If any aboveground storage tanks (ASTs) less than 12,500 gallons are installed, they must be registered with the TMS. If any ASTs greater than 12,500 gallons are installed, they are also subject to installation approval by the TMS.

Additional information on air quality

- New home and businesses may emit, or cause to be emitted, air contaminants into Delaware's air, which will negatively impact public health, safety and welfare. These negative impacts are attributable to:
    - Emissions that form ozone and fine particulate matter; two pollutants relative to which Delaware currently violates federal health-based air quality standards,
    - The emission of greenhouse gases which are associated with climate change, and
    - The emission of air toxics.

- Air emissions generated from commercial spaces include emissions from the following activities:
    - Area sources such as painting, maintenance equipment and the use of consumer products like roof coatings and roof primers.
    - The generation of electricity needed to support the commercial space, and all transportation activity.

Based on the information provided, the three air emissions components (i.e., area, electric power generation, and mobile sources) for the project could not be quantified.
Additional measures may be taken to substantially reduce the air emissions identified above. These measures include:

- **Constructing with only energy efficient products.** Energy Star qualified products are up to 30% more energy efficient. Savings come from building envelope upgrades, high performance windows, controlled air infiltration, upgraded heating and air conditioning systems, tight duct systems and upgraded water-heating equipment. Every percentage of energy efficiency translates into a percent reduction in pollution. The Energy Star Program is an excellent way to save on energy costs and reduce air pollution.

- **Offering geothermal and/or photo voltaic energy options.** These systems can significantly reduce emissions from electrical generation and from the use of oil or gas heating equipment.

- **Constructing with high albedo, high solar reflectance materials**. This includes roofing and hardscape. These materials help to reduce heat island impacts and, by extension, help to

minimize the potential for localized ground-level ozone formation. These materials also help reduce demands on air conditioning systems and save on energy costs.

- **Providing shade for parking areas.** Approaches may include architectural devices, vegetation, or solar panels. Providing shade for parking areas helps to reduce heat island impacts, and, by extension, helps to minimize the potential for localized ground-level ozone formation. Such measures can also have the additional benefit of channeling or infiltrating stormwater.

- **Providing charging stations for plug-in electric vehicles.** This measure helps to reduce localized air pollution by supporting the use of non-gasoline powered vehicles. Please refer to the US Department of Energy's website for electric vehicle readiness information: http://www1.eere.energy.gov/cleancities/electric_vehicle_projects.html.

- **Encouraging the use of safe multimodal transportation**. This measure can significantly reduce mobile source emissions. **For every vehicle trip that is replaced by the use of a sidewalk, bike path, or mass transit, 7 pounds of VOC and 11.5 pounds of NOx are reduced each year.**

- **Using retrofitted diesel engines during construction**. This includes equipment that is on-site as well as equipment used to transport materials to and from site.

- **Using pre-painted/pre-coated flooring, cabinets, fencing, etc**. These measures can significantly reduce the emission of VOCs from typical architectural coating operations.

- **Planting low VOC emitting trees in vegetative buffer areas, particularly those between the site and adjacent residential areas**. Native, low VOC trees reduce emissions by trapping dust particles and replenishing oxygen. Trees also reduce energy emissions by cooling during the summer and by providing wind breaks in the winter, whereby reducing air conditioning needs by up to 30 percent and saving 20 to 50 percent on fuel costs.

This is a partial list, and there are additional things that can be done to reduce the impact of the development. The applicant should submit a plan to the DNREC DAQ which address the above listed measures, and that details all of the specific emission mitigation measures that will be incorporated into the Delaware National Guard project. The DAQ point of contact is Deanna Cuccinello, and she may be reached at (302) 739-9402.

Instructions for Handling Asbestos:

- Please select a Certified Professional Service Firm (CPSF) from the attached list to inspect the facility and sample for Asbestos-Containing Materials (ACM). Once you receive the CPSF report detailing their findings as to how much, what type(s), and the location(s) of the ACM present, you can use that info to fill out the "Notification of Demolition or Renovation" form. If necessary, please select an asbestos abatement contractor from the attached list and call to schedule the work to begin three weeks (or more) from the date you mail the form to

EPA. When you choose an abatement contractor, please enter the remainder of the required info on the form, to include the name of the Abatement Contractor, name of the Hazmat Hauler who will haul the ACM, and the Hazmat landfill where the ACM will be taken. Once you have completed the form, please make four (4) copies of it, and then send the original to USEPA at the following address:

USEPA Region III
Attn: Asbestos Coordinator
1650 Arch Street
Philadelphia, PA 19103

Send one copy to the DAQ:
DNREC/DAQ
c/o Mr. Thomas Postell
655 S. Bay Rd., Suite 5N
Dover, DE 19901

- You must wait a minimum of ten business days after EPA receives your notification, prior to any activity which may disturb asbestos-containing materials (reasoning behind waiting three weeks to begin abatement work). This allows the EPA asbestos inspectors time to coordinate and schedule a site visit if they so desire.
- Once the ACM has been abated, a post-abatement inspection by a CPSF asbestos inspector shall be performed to verify that all ACM has been removed.
- Following asbestos removal and re-inspection, normal demolition procedures may be employed to complete the demolition process.
- Please keep in mind that physical demolition and loading, transport, and landfill dumping of construction/demolition debris can be quite costly. Another option for more affordable demolition does exist. If the local fire company is interested in using the structure(s) for firefighter training, they are authorized to burn it/them to the ground upon completion of their training. This significantly reduces the volume and mass of material remaining to be loaded, transported, and dumped; thereby reducing demolition costs by a good margin. Keep in mind that this type of demolition via firefighting instruction

Delaware State Fire Marshall's Office – Contact Duane Fox 739-4394

- Preliminary meetings with fire protection specialists are encouraged prior to formal submittal. Please call for appointment. Applications and brochures can be downloaded from our website: www.statefiremarshal.delaware.gov technical services link, plan review, applications or brochures.

Following receipt of this letter and upon filing of an application with the local jurisdiction, the applicant shall provide to the local jurisdiction and the Office of State Planning Coordination a written response to comments received as a result of the pre-application process, noting whether comments were incorporated into the project design or not and the reason therefore.

Thank you for the opportunity to review this project. If you have any questions, please contact me at 302-739-3090.

Sincerely,

Constance C. Holland, AICP
Director, Office of State Planning Coordination

Attachment
CC: Town of Dagsboro