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July 28, 2008

VIA FED EX

Regional Hearing Clerk
U.S. EPA Region III (3RC00)
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: In Re: Barnsley Square LP and Selvaggio Enterprises, Inc.
Docket No. CAA-03-2008-0363**

Dear Regional Hearing Clerk:

Enclosed please find the Respondents' Answer in the above-referenced matter. Kindly time-stamp the same and return a copy to my office in the enclosed self-addressed stamped envelope.

Thank you for your attention to this correspondence. Please feel free to call me with any questions or concerns.

Very truly yours,

MARGLE LAW OFFICES, P.C.

By:


Stanley J. Margle, III

SJM/cac
ENCL.

cc: Stephen F. Selvaggio

2008 JUL 29 11:12:08

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

IN RE:

BARNESLEY SQUARE LP
623 Selvaggio Drive
Nazareth, PA 18064, and

SELVAGGIO ENTERPRISES, INC.
623 Selvaggio Drive
Nazareth, PA 18064,

Respondents

DOCKET NO: CAA-03-2008-0363

ADMINISTRATIVE COMPLAINT
AND NOTICE OF
OPPORTUNITY FOR HEARING

RECEIVED
MAY 29 11:19:00
2008

AND NOW, come the Respondents, Barnesley Square LP and Selvaggio Enterprises, Inc. (hereinafter collectively referred to as "Respondents"), by and through their Attorney, Stanley J. Margle, III, Esquire, with this Answer of which the following is a statement:

IV. GENERAL ALLEGATIONS.

19. Admitted.

20. Admitted in part and Denied in part. It is Admitted that SEI is a corporation organized under the laws of, and doing business in, the Commonwealth of Pennsylvania at the location provided in the Complaint; however, after reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the remaining averments contained in paragraph twenty (20) and, therefore, the averments are deemed Denied.

21. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

22. Denied. The allegations set forth Conclusions of Law to which no

response is required. However, to the extent that an answer is required the allegations are Denied.

23. – 37. Denied. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph twenty-three (23) through thirty seven (37) and, therefore, the averments are deemed Denied.

38. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

39. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

40. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

41. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

V. VIOLATIONS.

Count I

FAILURE TO PROVIDE ADMINISTRATOR WITH WRITTEN NOTICE OF INTENTION TO RENOVATE

42. No response required.

43. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

44. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph forty-four (44) and, therefore, the averments are deemed Denied.

45. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

Count II
FAILURE TO HAVE ON-SITE REPRESENTATIVE TRAINED IN THE PROVISIONS OF ASBESTOS NESHAP

46. No response required.

47. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

48. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph forty-eight (48) and, therefore, the averments are deemed Denied.

49. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

Count III
FAILURE TO KEEP REMOVED RACM ADEQUATELY WET UNTIL COLLECTED FOR DISPOSAL

50. No response required.

51. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

52. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph fifty-two (52) and, therefore, the averments are deemed Denied.

53. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

Count IV
FAILURE TO DEPOSIT ALL ASBESTOS-CONTAINING WASTE MATERIALS AS SOON AS PRACTICAL AT A WASTE DISPOSAL SITE OPERATED IN ACCORDANCE WITH 40 C.F.R. SECTION 61.154

54. No response required.

55. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

56. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph fifty-six (56) and, therefore, the averments are deemed Denied.

57. After reasonable investigation, Respondents are without knowledge or information to form a belief as to the truth of the averments contained in paragraph fifty-seven (57) and, therefore, the averments are deemed Denied.

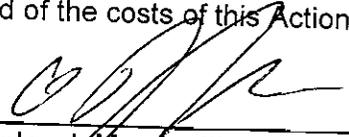
55. Denied. The allegations set forth Conclusions of Law to which no response is required. However, to the extent that an answer is required the allegations are Denied.

WHEREFORE, Respondents respectfully request Judgment in their favor and against Complainant and respectfully request dismissal of the claims against them with prejudice and

for such other and further relief as is proper, including an award of the costs of this Action.

Date: _____

By: _____



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Attorney for Respondents