

# INDIANA FIRE PREVENTION AND BUILDING SAFETY COMMISSION

**TO:** Roger L. Lehman, Representative of the Owner  
Stuart B. Milner, Owner of Garvin Business Center

**FROM:** Indiana Fire Prevention and Building Safety Commission (Commission) Staff

**DATE:** Friday, June 18, 2021

**RE:** Response to Request for Review pursuant to Indiana Code § 22-13-2-7(a) – May 25, 2021 Fire Watch Agreement between Evansville Fire Department and Garvin Business Center

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Mr. Lehman:

The Indiana Fire Prevention and Building Safety Commission (the Commission), care of Commission staff, received your request for review, pursuant to Indiana Code § 22-13-2-7(a), of the Evansville Fire Department's and the Garvin Business Center's May 25, 2021 Fire Watch Agreement (the Order) on Thursday, May 27, 2021 via electronic mail. Pursuant to the Commission's Procedure for Review of Orders Pursuant to Indiana Code § 22-13-2-7(a) (<https://www.in.gov/dhs/files/Procedure-for-Review-of-Orders-Pursuant-to-IC-22-13-2-7a-Adopted-by-FPBSC-3-5-19.pdf>), your request was not eligible to be considered by the Commission at its Wednesday, June 2, 2021 meeting.

Upon review of your request and the Order, and as was explicitly advised during the Commission's Wednesday, June 2, 2021 meeting, the Commission's staff has determined that your request for review of the Order **does not qualify** for review by the Commission pursuant to Indiana Code § 22-13-2-7(a). The Order was issued pursuant to Indiana Code § 36-7-18-9, and, pursuant to Indiana Code § 36-7-18-11, the Order may be reviewed by the Commission under Indiana Code § 4-21.5-3-7 (Administrative Orders and Procedures Act) upon submission of a petition for administrative review. Pursuant to the Commission's Procedure for Review of Orders Pursuant to Indiana Code § 22-13-2-7(a), orders that may be reviewed under the Administrative Orders and Procedures Act must be reviewed by following those procedures and by filing a petition for administrative review.

Subsequent to your request, your client's attorney filed a petition for administrative review of the Order. The petition for administrative review was subsequently granted and the Commission's staff forwarded the petition to the Office of Administrative Law Proceedings for assignment to the Commission's administrative law judge, to initiate the administrative review proceedings. To the Commission staff's current knowledge, the administrative review proceedings of this matter are ongoing, which now renders review of the Order pursuant to Indiana Code § 22-13-2-7(a) no longer necessary. As such, no further action will be taken regarding your request for review of the Order pursuant to Indiana Code § 22-13-2-7(a). If you any further questions or concerns, please contact

the Commission's staff at [buildingcommission@dhs.in.gov](mailto:buildingcommission@dhs.in.gov).

Enclosure

Service by Electronic Mail

Cc (by Electronic Mail):

**James D. Johnson**, Attorney for the Owner, Jackson Kelly PLLC  
Greg W. Main, Chief Fire Marshal, Evansville Fire Department

**Douglas J. Boyle**, Director of the Indiana Fire Prevention and  
Building Safety Commission, Indiana Department of Homeland  
Security

**Philip A. Gordon**, Deputy Attorney General and Legal Counsel to  
the Indiana Fire Prevention and Building Safety Commission,  
Office of the Attorney General

**Justin K. Guedel**, Deputy General Counsel, Indiana Department  
of Homeland Security

May 28, 2021

*Via Electronic Mail (buildingcommission@dhs.in.gov)*

Fire Prevention and Building Safety Commission  
Indiana Department of Homeland Security  
302 W. Washington Street, Room E-208  
Indianapolis, IN 46204  
[buildingcommission@dhs.in.gov](mailto:buildingcommission@dhs.in.gov)

**RE: Request for Review of May 25, 2021 Fire Watch Agreement between Evansville Fire Department and Garvin Business Center**

Dear Sir or Madam,

The following correspondence is a Request for Review made pursuant to Ind. Code §22-13-2-7(a) and in compliance with the Fire Prevention and Building Safety Commission (the “Commission”)’s procedures for same.

1. The Name and Contact Information of the Interested Person and Entity Issuing the Order

My name is Roger L. Lehman (the “Interested Person”), and I write on behalf of Garvin Business Center (“Garvin”), to request the review of a Fire Watch Agreement (the “Order”) entered into by the Evansville Fire Department (“EFD” or “Issuing Entity”) and Garvin on May 25, 2021. The name and contact information for both the Interested Person and the Issuing Entity is provided below.

2. The Order the Interested Person Requests to be Reviewed

The Order provides that the fire chief of the EFD deemed it essential for public safety that Garvin employ a fire watch for Garvin’s property located at 1315 Read St, Evansville, IN 47710 (the “Property”). The fire watch costs Garvin approximately \$500 per day. A copy of the Order is attached.

3. Exhaustion of Internal Review Options

The Commission’s next regularly scheduled meeting is to be held on June 2, 2021. The Interested Person has not exhausted all internal review options, but respectfully requests the Commission waive this requirement for four (4) reasons: (1) the EFD consented to waiving the internal review by incorporating Garvin’s request into the Order; (2) the EFD’s Request for Sanction of Variance 16-03-61 is presently scheduled to be heard at the Commission’s June 2<sup>nd</sup> meeting, and this Request for Review is directly related to the EFD’s Request for Sanction; (3) the Order was issued only eight (8) days prior to the June 2<sup>nd</sup> meeting, which has left Garvin with

inadequate time to exhaust all internal review options given the Order's proximity to the meeting date; and (4) if forced to wait an additional thirty (30) days to seek the Commission's review the Interested Person and/or Garvin will bear an unreasonable cost<sup>1</sup>.

4. Statement Explaining the Reason for Review and Why the Commission should Modify or Reverse the Order

A.

Garvin purchased the Property, which is an older industrial park, in 1995. Situated on the Property is an industrial complex that Garvin converted into a business center. Garvin currently leases space in the complex to nineteen (19) tenants. Twelve (12) tenants operate under the B, S2, or F2 classifications, and seven (7) operate under the S1 or F1 classifications.

B.

In 2016, Garvin sought a variance from the Commission, Variance 16-03-61, which was granted on March 1, 2016. The Variance required Garvin's fire prevention systems to meet several conditions, one of which was to comply with certain NFPA standards. On February 1, 2021, members of the EFD's Fire Marshal Division conducted a fire inspection and determined that Garvin was not in compliance with the 2016 Variance.

C.

Water had been allowed into the Property's dry sprinkler system, causing a flow switch trouble signal to trip on the alarm panel for riser system number 1. Garvin attempted to reset the system, but the attempt was unsuccessful due to problems with the alarm module. Garvin corrected the issue; however, two (2) additional alarm modules indicated similar trouble signals. The EFD indicated that they would require a fire watch until the additional alarm modules were repaired or the issues sufficiently corrected. Garvin corrected the additional alarm module issues the following day and all notification devices were in service.

D.

Around the same time, EFD and Garvin's representatives also discussed an internal inspection report from 2018 that indicated internal debris was present in the systems and recommend the systems be flushed. EFD's position was that the internal debris issue had not been satisfactorily addressed. In response, Garvin agreed to have a general inspection completed by July 23, 2021 to determine the system's condition and service capabilities. Garvin is concerned with continuing to "bandage" an 80-year-old system and would move to install a new system to be ready for installation by October 1, 2021.

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<sup>1</sup> At \$500 per day, the additional 30 days would cost Garvin approximately \$15,000.

E.

On Monday May 24, 2021, the EFD and Garvin met to discuss Garvin's intent to begin putting a financing plan in motion and plans drawn to submit for CDR plan review. Without notice, the EFD returned the following day, Tuesday May 25, 2021, to verify the systems were active and monitored. During this unannounced visit, EFD presented Garvin an order and urged Garvin to sign an agreement to continue the fire watch until such time as plans were submitted to AHJ to EFD's satisfaction or the building would be ordered vacated.

F.

The sprinkler system is operational and continues to be adequately monitored, just as it has been for the last several years. This new requirement that Garvin pay for a \$500+ daily fire watch financially prevents Garvin from obtaining the necessary financing to upgrade the system (estimated to be around \$300,000). Again, the system is fully functional throughout the occupied and vacant main floor and is capable and ready to send an alarm to a monitoring station in the event such an alarm becomes necessary. EFD is aware of this fact. Thus, there is no imminent danger to the Property's occupants.

G.

The system is 80+ years old and in need of upgrades or removal as outlined in Variance 16-03-61. Since this event has occurred, Garvin is seriously contemplating changing course, particularly given that the variance would permit Garvin to abandon all the sprinkler systems and replace same with a smoke detection and auto fire alarm system in areas which store combustibles. Garvin has already abandoned two sprinkler risers on the vacant 2<sup>nd</sup> story of the Property in compliance with the variance, but they did not remove any other sprinkler heads because they did not abandon any other systems. All the aforementioned action was contemplated and permitted by the variance.

H.

Ultimately, the building on the Property should not require sprinklers or fire alarms in approximately 75% of its space. Thus, Garvin's goal was to leave its systems active until the smoke detection and fire alarm systems were installed in the other 25% of space. At that point, Garvin would remove the sprinkler heads as well as the piping. After that initial removal of sprinkler heads and piping, the final step would be to leave systems active until all the sprinkler heads and piping were removed from the remaining space.

I.

Garvin believes it has the finances in place for the above and it can all be accomplished in six (6) months.

J.

Garvin requests the EFD's May 25, 2021 Order, which requires Garvin to maintain a fire watch during public business hours, be removed while the above is being accomplished. Garvin will provide EFD monthly updates on the progress of the above.

Respectfully,

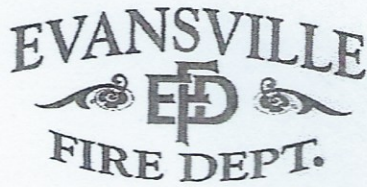
By: Roger L. Lehman

Evansville Fire Department:

550 S.E. Eighth St.  
Evansville, IN 47713  
Telephone: (812) 435-6235

Roger L. Lehman:

1220 N. Red Bank Rd.  
Evansville, IN 47720  
Telephone: (812) 589-0331  
Email: [roger@rlehmanandson.com](mailto:roger@rlehmanandson.com)



LLOYD WINNECKE  
MAYOR

MIKE CONNELLY  
FIRE CHIEF

550 S.E. Eighth St. • Evansville, IN 47713-1786  
(812) 435-6235 • FAX: (812) 435-6248 • TDD/Hearing Impaired: (812) 436-4925

### FIRE WATCH AGREEMENT

This Fire Watch Agreement ("**Agreement**") is made and entered this 25 day of MAY, 2021, by and between the City of Evansville, Indiana Fire Department ("**Fire Department**") and Garwin Business Center, the owner, agent or lessee of a Class 1 structure or any other place that people congregate (hereinafter, "**Obligor**") located at 1315 Grand Street, Evansville, Indiana (the "**Property**"). The Fire Department and Obligor shall collectively be known as the "**Parties**."

### RECITALS

**WHEREAS**, a fire watch is a temporary measure intended to ensure continuous and systematic surveillance of a building or portion thereof by one or more qualified individuals for the purposes of identifying and controlling fire hazards, detecting early signs of unwanted fire, raising an alarm of fire and notifying the Fire Department (hereinafter, "**Fire Watch**");

**WHEREAS**, Indiana Administrative Code 675 IAC 22-2.5-5 states that whenever it is essential for public safety, the fire chief for the Fire Department (the "**Fire Chief**") may require Obligor to employ one (1) or more qualified persons to be on duty to serve as a Fire Watch for the Property;

**WHEREAS**, the Fire Chief has deemed it essential for public safety that Obligor employ a Fire Watch for the Property; and

**WHEREAS**, Obligor agrees to employ a Fire Watch per the terms and conditions of this Agreement.

**NOW, THEREFORE**, the Parties agree as follows:

1. **Fire Watch Contractor.** Obligor shall contact and employ a qualified fire watch contractor to commence the Fire Watch on the Property. A qualified fire watch contractor shall be a certified firefighter who has completed the minimum mandatory training under Indiana law. The fire watch contractor must be approved by the Fire Chief, with such approval to be made in the Fire Chief's sole discretion.
2. **Fire Watch Duties.** Obligor agrees that it shall require its fire watch contractor as employed in Section 1 to follow the Fire Watch Protocol that is attached hereto as **Exhibit A**.
3. **Fire Department Acting as Fire Watch Contractor.** During the period between the Fire Chief determining that a Fire Watch is necessary and Obligor employing a qualified fire watch contractor

to commence the Fire Watch, if the Fire Department must utilize its own firefighters to commence the Fire Watch, then Obligor shall reimburse the Fire Department for any wages, overtime or other fees incurred by the Fire Department in performing such duties. The Fire Department shall invoice such wages, overtime or other fees to Obligor. Obligor shall then make payment to the Fire Department within ten (10) days of receiving such invoice. In the event of non-payment, Obligor agrees to pay all of Fire Department's reasonable attorneys fees, collection costs, court costs and expenses associated with the collection of any amounts owed under this section.

4. **Termination of Fire Watch.** A Fire Watch commenced under this Agreement may only be terminated upon the sole discretion of the Fire Chief or the Fire Chief's designee.

5. **Governing Law and Venue.** This Agreement shall be governed by and construed in accordance with the laws of the state of Indiana. In the event of any litigation between the parties hereto concerning this Agreement or any matters related thereto, such action shall be brought in state court in Vanderburgh County, Indiana.

6. **Entire Agreement.** This Agreement contains the entire agreement between the parties respecting the matters herein set forth and supersedes all prior agreements and understandings between the parties hereto respecting such matters.

**FIRE DEPARTMENT:**

City of Evansville, Indiana, by and through its  
Evansville Fire Department

By:

*Kevin Alan Chief Fire Marshal*

Its:

*Chief Fire Marshal*

**OBLIGOR:**

*Roger L. Lehnert, agent*  
Owner, Agent or Lessee of Property

Roger L. Lehnert  
Printed Name

This form was approved by the Safety Board at its meeting on September 12, 2018.

Note: This facility is placed under a mandatory fire watch, during business hours. This order shall be in place until Garvin Business Center has provided a plan that has been approved by the AHJ on upgrading the current automatic sprinkler system or installing a new automatic sprinkler system. Fire Watch detail shall consist of 1 person conducting roving patrols of the facility.

*OWNER Intends, on Appealing this order on June 2 @ State Board of Fire Prevention and Building Safety.*



## **Garvin Industrial Park 2008-April 1, 2021**

Sprinkler System violation order issued by State Fire Marshal April 21, 2008

Correction attempts, repair estimates obtained.

As system was beyond salvaging in SFM view recommendation was made by State Fire Marshall and State Building Commissioner and State Director of Code Enforcement to remove system. Sometime in 2009.

GIP determined they would prefer to keep a portion of the system operational as it would provide no less coverage than having no sprinklers.

GIA intends to continue to provide, and will certify as part of this variance request, annual inspections by a certified sprinkler contracting company, and agrees to repair any leaks and problems within the existing sprinkler system or with the monitoring/notification component to keep the system functional. GIA's insurance carrier annually inspects this facility and GIA maintains all aspects of fire and life safety in conformance with their requirements. Mandating total NFPA 25 Sprinkler testing and maintenance Standards on this extremely old, but functioning, system would cause GIA to consider shuttering the building which would then be destined to become another unusable building shell in this already struggling economy.

In March of 2010 a Variance was filed with State Fire and Building Services to keep part of system which was working in place, maintaining system as well as possible (not to NFPA 25) and labeling all non-functioning riser areas with signage indicating that the sprinkler system was not compliant with current codes. Also required was annual dry test and fire pump test. Monitoring was to be maintained and leaks repaired as they became evident. No further occupancy of 2<sup>nd</sup> floor unless approved by EFD.

Variance meeting minutes: Variance 10-02-14 Garvin Industrial Associates, Evansville, was represented by Roger Lehman, RLehman Consultants. An old industrial plant had been purchased in 1995 which had a wet sprinkler system, pump house and electric pump. It had been changed to a dry system which is no longer compliant with current NFPA 25, and would cost \$250,000 to upgrade for a building valued at \$275,000. The request was to create a maintenance program to be approved by the Commission as the standard for this building. They preferred to keep the system on, providing at least partial protection, with an annual dry test and fire pump test. It was to be monitored 24/7 with valve-off monitors, and leaks were to be repaired as they occurred. Occupancy on the second level wasn't to be increased and an NFPA 664 dust collection system was to be installed in the woodworking area. Commissioner Christoffersen moved to approve with the second by Commissioner Hawkins. It was voted upon and carried with one nay vote.

April 6, 2010 Variance was approved.

As owner assumed systems would eventually fail and repeated leaks were causing a maintenance nightmare, In 2015 GIP finally determined we needed an exit strategy for maintenance of the system the state wanted us to remove since 2008.

In early 2016, a variance was developed to begin to eliminate the systems a little at a time. The main leakage was from the 2nd floor so we received approval to disconnect all 2<sup>nd</sup> floor piping

from system, abandon in place and protect area with beam smoke detectors which has been done. Monitoring has been reinstated and is functioning as intended. No occupancy classification changes have been necessary and no additional 2<sup>nd</sup> floor occupancy has been requested.

Part 2 of the 4 part “sprinkler system deletion” strategy involved leaving an option for the owner to utilize a few of the systems as code compliant wet systems if they were to be found functional. To our surprise, once the 2<sup>nd</sup> floor piping was disconnected, all of the main level dry systems were operational. The idea of removing all the heads by March 2018 was tied to the assumption that most, if not all, of the systems would be abandoned and removing the heads would remove the appearance of being sprinkler protected.

Part 3 of the approved 2016 variance was to require removal of the main level piping on each system that was abandoned when the space was vacated and prior to re-occupancy. There was no time limit attached to this condition.

The last part of the 2016 Variance requires that any space, current or future, that is not B, F2 or S2 and is not protected by a sprinkler system would be protected by smoke detection system tied to monitoring service with horn strobe devices in the tenant space and adjacent occupied spaces for early warning.

The owner is complying with the conditions of the current 2016 variance, with the exception of converting to wet systems as majority of building is unheated, which updates the earlier 2010 variance.

2018 a sampling check of sprinkler heads has been made and they are still serviceable. Internal piping test has been completed and some piping is still serviceable and some needs flushing.

**2020** update: Sprinkler system has been up and down several times and monitoring not consistently provided as required. Also new S1 high hazard, high piled storage plastics operation moved in without getting approval from EFD. GBC has institutionalized monitoring and instituted replacement program for out of service accelerator pumps, with plans to replace 2 per year.

**2021** update: EFD appropriately filed for possible sanctions against 2016 variance which triggered the High piled, high hazard plastics facility vacating the premises after GBC commissioned sprinkler evaluation and determined it was not feasible to upgrade system. The Main sprinkler supply line froze and broke resulting in over 2 weeks of repairs and fire watch coverage. Rlehman and Son Consulting have been retained to review other potential high piled storage areas, all which will be reduced in height of combustible materials to eliminate high piled storage designation. Storage space floorplans are being developed and

information provided on type and height of materials stored. No future leases of S1 spaces will be allowed without Rlehman and Son Consulting and EFD review.

3. Ordinances.

Building Ordinance No. 02-2010  
Plainfield, Indiana

Shelly Wakefield, Director, Fire and Building Code Enforcement, introduced the building ordinance for Plainfield, Indiana, and recommended approval. Commissioner Jones moved to approve with the second by Commissioner Ogle. It was voted upon and carried.

4. Third Party Certification and Inspection.

Pyramid1  
19260 County Road 46  
PO Box 463  
New Paris, IN 46553

Shelly Wakefield, Director, Fire and Building Code Enforcement, introduced the request for third party certification by Pyramid 1, noting they were in compliance and recommending approval. Commissioner Christoffersen moved to approve with the second by Commissioner Brenner. It was voted upon and carried.

5. Variances.

Tabled Variances.

John Haines advised the Commission that the proponent for variance 10-03-21 Catalyst Refinement Service Tower #500, Whiting, had requested the variance be tabled for thirty days. Commissioner Jones moved to table with the second by Commissioner Christoffersen. It was voted upon and carried. Variance 10-02-14 Garvin Industrial Associates, Evansville, was represented by Roger Lehman, RLehman Consultants. An old industrial plant had been purchased in 1995 which had a wet sprinkler system, pump house and electric pump. It had been changed to a dry system which is no longer compliant with current NFPA 25, and would cost \$250,000 to upgrade for a building valued at \$275,000. The request was to create a maintenance program to be approved by the Commission as the standard for this building. They preferred to keep the system on, providing at least partial protection, with an annual dry test and fire pump test. It was to be monitored 24/7 with valve-off monitors, and leaks were to be repaired as they occurred. Occupancy on the second level wasn't to be increased and an NFPA 664 dust collection system was to be installed in the woodworking area. Commissioner Christoffersen moved to approve with the second by Commissioner Hawkins. It was voted upon and carried with one nay vote. Variance 10-03-4 French Lick – West Baden Development (b)(c)(d)(e) was represented by Tom Schroeder, Schroeder & Associates, and Brian Slinkard, owner. Variance (b) was a request to allow an extension to the travel distance. Staff members were all equipped with headsets to maintain contact with all areas of the track and their status. A central control worker was able to decrease speed or kill all engines from one point. Refueling was done from one point and handled similarly to the Indianapolis 500 method with a safety fire watch whenever cars are fueled or the main tank was filled. Commissioner Hawkins noted he had visited the site and found it spotless and well-maintained. He then moved to approve with the second by Commissioner Ogle. It was voted upon and carried with one nay vote. Variance (c) was to allow exits which were not accessible. The cars were not handicapped-accessible and the track, staffed by workers able to assist drivers and step over 10" barriers, has a ramp to be used by emergency personnel, which is not compliant. Exits on the main level of the area were accessible. After discussion, Commissioner Hawkins moved to approve with the second by Commissioner Christoffersen. It was voted upon and carried. Variance (d) was to allow the 30 gallon safety tank mounted on a golf cart to be considered permanent use, not temporary as interpreted by inspectors. After a lengthy discussion of fueling and safety procedures, Commissioner Hawkins moved to approve with the condition that a hatch be installed in the northwest corner of the track area wall to allow the introduction of a fueling hose to fill the mounted safety tank from that location within thirty days (30) of the date of the departmental action letter. Commissioner Ogle made the second. It was voted upon and carried with one nay vote. Variance (e) was to allow the 2.6 hour party wall between the track area and the undeveloped area adjoining it to have utilities and a 1½ hour rated opening connecting them. The two areas are currently owned by the same person, and the undeveloped area used for concession storage. When the unused area is leased, the opening will be closed or a fire-rated corridor installed. After discussion, Commissioner Hawkins moved to approve with the condition that



**MICHAEL R. PENCE, Governor  
STATE OF INDIANA**

**DEPARTMENT OF HOMELAND SECURITY**

**DAVID W. KANE, EXECUTIVE DIRECTOR**

Indiana Department of Homeland Security  
Indiana Government Center South  
302 West Washington Street  
Indianapolis, IN 46204  
317-232-3980

Stuart B Milner  
Garvin Industrial Associates, LP  
102 EAST SPINGFIELD AVE  
  
UNION, MO 63084

March 4, 2016

Dear Stuart Milner,

This letter provides notice below of the action taken by the Fire Prevention and Building Safety Commission on your application(s) for a variance(s) from the Commission's rules under IC 22-13-2-11 and 675 IAC 12-5. The Commission considered the application with all alternatives offered, as a part of its published agenda, at its regular meeting on March 1, 2016.

Project Number	Project Name	Variance Number
0	Garvin Industrial Park	16-03-61

**Commission Conditions**

**Disconnect and abandon in place upper level dry sprinkler system by 09/01/16. Re-establish and maintain monitoring of remaining systems.** Maintain existing tenants and occupancies. Any new tenants will be limited to B, S2 or f2 occupancies, other occupancies will comply with all current codes including but not limited to required fire area separations and/or fire sprinkler protection. No increased occupancy on upper level without approval of EFD. **Upper level will be protected by beam smoke detectors.** Remove all heads on all lower level sprinkler systems by 03/01/18. Owner desires to have option of upgrading one or more of the main level 14 riser systems to wet system and will comply with NFPA 13 and 25 for those systems. Will be filed with Plan Review as they are upgraded. **If lower level systems are determined to be non-salvageable, visible piping will be removed when space is vacated and prior to re-occupancy. Spaces with current occupancies and future occupancies other than B, S2 or F2, and with sprinkler systems that are found non-salvageable will be protected by smoke detection and alarm system that will notify central station and will activate horn strobe device in the tenant space and adjacent spaces.**

Edition	Code	Code Section	Commission Action & Date
12-4-9	Maintenance of Existing Buildings and Structures	IFC 2014 Sec 901.6.1	Approved with Commission condition(s) 03/01/2016

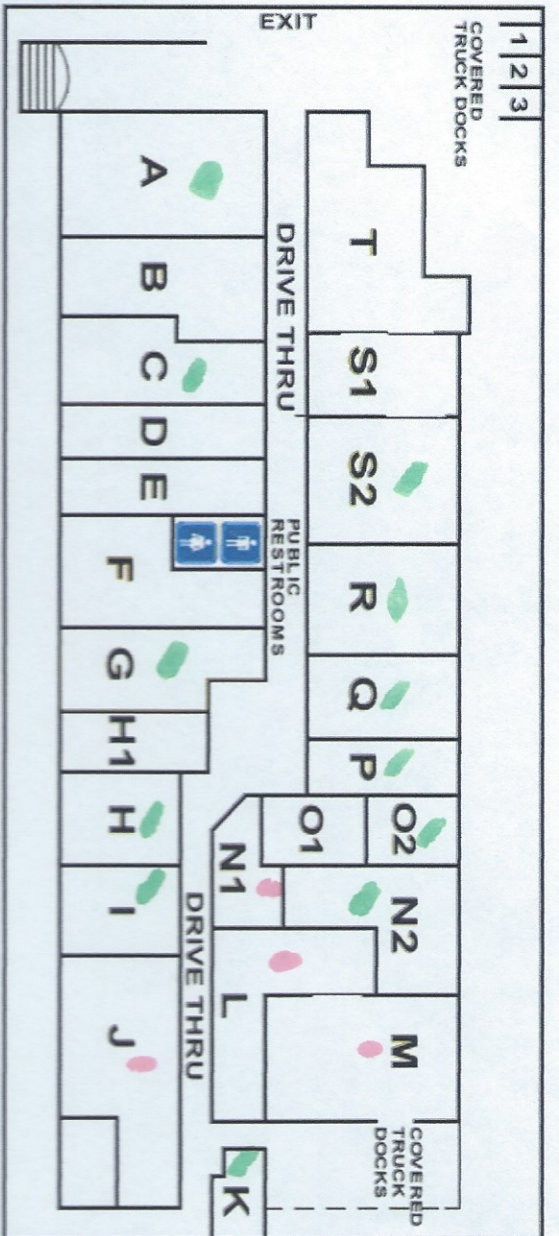
You are advised that if you desire an administrative review of this action, you must file a written petition for review at the above address with the Fire Prevention and Building Safety Commission. Your petition must fully identify the matter for which you seek review no later than eighteen(18) calendar days from

the above stated date of this letter, unless such date is a Saturday, Sunday, legal holiday under state statute, or day that the Department of Homeland Security's offices are closed during regular business hours; in which case the deadline would be the first day thereafter that is not a Saturday, Sunday, legal holiday under state statute, or day that the Department of Homeland Security's offices are closed during regular business hours. If you do so, your petition for review will be granted and an administrative proceeding will be conducted by an administrative law judge appointed by the Fire Prevention and Building Safety Commission. If you do not file a petition for review, this action will be final. Please be further advised that you may request an opportunity to informally discuss this matter prior to filing a petition for review. Such informal discussion, or request therefore, does not extend the deadline for filing a petition for review and, therefore, any request for an informal discussion should be made promptly, preferably by telephone or e-mail, upon receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean M. Illingsworth". The signature is written in a cursive style and is contained within a light gray rectangular box.

Dean Illingsworth  
State Building Law Compliance Officer,  
Department of Homeland Security



Name	Space	SQFT-TOTA	System #*	Occ Class
Mount. Valley	A	6,915	5	S2
HMR	B	7,086	4 & 5	S1
TriState Cyl HD	C	5,655	3 & 5	S2
HMR	D	4,454	3 & 6	S1
HMR	E	4,454	3 & 6	S1
Essent. Foods	F	10,104	6 & 7, 8	S1
TriState Cyl Hd	G	3,864	6 & 9	F2
Garv. Office	H	4,800	10	B
Grace Elec	H1	3,162	6 & 9 & 10	F1
Cardinal Ice	I	4,312	11 & 12	S2
Vacant	J	9,677	13 & 14	Vacant
Shekell	K	1,156	11	S2
Vacant	L	6,639	11 & 13	Vacant
Vacant	M	9,700	14	Vacant
Vacant	N1	2,101	9 & 11	Vacant
Shekell	N2	6,639	13	S2
Personal Storage	O1	2,424	13	S1
Feed Screws	O2	1,522	12 & 13	S2
Baylor	P	3,694	8 & 13	S2
TriState Cyl Hd	Q	5,000	8	S2
R and D Imaging	R	6,386	8	F2
Spectrum	S2	7,900	8	S2
Essent. Foods	S	4,844	3	S1
Essent. Foods	T	7,610	2 & 3	S1
	N Drive In	Dock	1	N/A
		130,098	<b>*Riser Location in Bold</b>	

- S2, F2, B  
 - Vacant  
 O - S1, F1  
 NOTE: 2nd Story disconnected  
 risers 6+7

Systems passing internal inspection:  
 10/23/18 12, 13, 14