



August 3, 2011

Mr. John Pekala  
ENVIRON International Corporation  
560 West Lake Mead Parkway  
Henderson, Nevada 89015

**Regarding:     *Visual Assessment of the RZ-D Debris Piles*  
                  **Nevada Environmental Response Trust**  
                  **560 West Lake Mead Parkway**  
                  **Henderson, Nevada 89015**  
                  **Project – CON111106****

Dear Mr. Pekala,

Logistical Solutions, LLC (LoSo) is pleased to provide ENVIRON International Corporation the results of the *Visual Assessment of the RZ-D Debris Piles* conducted for the Nevada Environmental Response Trust site located at 560 West Lake Mead Parkway in Henderson, Nevada. The purpose of the visual assessment was to identify, within reason, the presence and location of suspect asbestos-containing materials (ACMs) within the debris piles located within Remediation Zone RZ-D (project area). Physical assessment activities, such as bulk material sampling, were not conducted as part of this scope of work. The general location of the debris piles is depicted on Drawing 1.

#### **EPA – National Emission Standard for Hazardous Air Pollutants (NESHAP)-Asbestos**

The *United States Environmental Protection Agency* (EPA) regulates the emission of asbestos in Title 40 of the *Code of Federal Regulations* (CFR), Chapter I, Subchapter C, Part 61, Subpart M, *National Emissions Standards for Hazardous Air Pollutants* (NESHAP). The NESHAP provides regulatory standards for the control of asbestos emissions during the removal and/or abatement of regulated asbestos containing material (RACM).

RACM is defined by NESHAP as meeting any of the following definitions: 1) a friable asbestos material; 2) a Category I non-friable ACBM that has become friable; 3) a Category I non-friable asbestos containing building materials (ACBM) that will be or has been subject to sanding, grinding, cutting, or abrading, or 4) a Category II non-friable ACBM that has a high probability of becoming or has become crumbled, pulverized or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

The NESHAP provides the following definitions for friable, non-friable, Category I non-friable, and Category II non-friable asbestos material:

- ◆ **Friable asbestos material** means any material containing more than one percent asbestos.... that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.
- ◆ **Non-friable asbestos material** means any material containing more than one percent asbestos.... that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- ◆ **Category I non-friable asbestos-containing material (ACM)** means asbestos-containing

packings, gaskets, resilient floor covering, and asphalt roofing products containing more than one percent asbestos.

- ◆ **Category II non-friable** ACM means any material, excluding Category I non-friable ACM, containing more than one percent asbestos...that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

According to the NESHAP, RACM must be removed prior to a demolition or renovation of a building. The NESHAP also requires State and local notifications, proper handling, and proper disposal of RACM that may be removed or disturbed during any demolition, repair, or maintenance activities involving the RACM.

### **OSHA - General Construction Standard**

The *Occupational Safety and Health Administration* (OSHA) regulates exposure to airborne asbestos for construction workers in Title 29 CFR, Part 1926.1101, *General Construction Standard (GCS)*. The GCS regulates exposure in all work as defined in 29 CFR 1910.12(b), including, but not limited to the following:

- ◆ Demolition or salvage of structures where asbestos is present;
- ◆ Removal or encapsulation of materials containing asbestos;
- ◆ Construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos;
- ◆ Installation of products containing asbestos;
- ◆ Asbestos spill/emergency cleanup;
- ◆ Transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed;
- ◆ Coverage under this standard shall be based on the nature of the work operation involving asbestos exposure; and
- ◆ This section does not apply to asbestos-containing asphalt roof coatings, cements, and mastics.

The GCS, which requires proper training of workers prior to the commencement of work, classifies asbestos-related work under this section into four classes:

- ◆ **Class I** – activities involving the removal of thermal system insulation (TSI) and surfacing asbestos-containing material (ACM) and potential asbestos-containing material (PACM);
- ◆ **Class II** – activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics;
- ◆ **Class III** – repair and maintenance operations, where “ACM” including TSI ACM, surfacing ACM, and PACM may be disturbed; and
- ◆ **Class IV** – maintenance and custodial activities during which employees contact, but do not disturb, ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, Class II, and Class III activities.

### **Visual Assessment Activities**

On July 28, 2011, a Nevada-licensed asbestos building inspector performed a visually assessment of the debris piles located with RZ-D for the presence of suspect ACMs. Photographs of the materials observed are included in the photograph log.

The following table presents the suspect ACMs identified within the RZ-D debris piles:

Description	Friable (yes or no)	Type (S/T/M)	Photograph No.
Soil	Yes	Miscellaneous	1
Asphalt Debris	No	Miscellaneous	1
Concrete Debris	No	Miscellaneous	1
Grout	No	Miscellaneous	2
Fiberglass or transite panels	No	Miscellaneous	3 - 4
Flat vinyl or synthetic rubber	No	Miscellaneous	5
Rectangular-shaped panel with screw holes similar to that of a fiber cement board	No	Miscellaneous	6
Charred debris/burn piles	Yes	Miscellaneous	7-8
White to grey fibrous material	Yes	Miscellaneous	9

**Notes:** Type S = Surfacing Type T = Thermal System Insulation (TSI) Type M = Miscellaneous

It should be noted that the visual inspection only included those materials observed on the ground surface. Other suspect ACM materials that were not identified in the above could be buried within the debris piles. It appeared that the suspect ACM may have originated from different locations of varying dates and time from construction or demolition activities. Based on this information, the different piles of suspect ACM observed within the RZ-D debris piles are not considered a homogenous area. Only similar materials of similar origin may be included in one homogenous area. Asbestos may be present in any of the materials identified above or in materials that were not discovered at the time of the visual assessment.

### **Conclusions and Recommendations**

The debris piles should be considered RACM unless a Nevada-licensed asbestos building inspector conducts an asbestos survey of the materials within the debris piles in general accordance with the sample collection protocols established in EPA Regulation 40 CFR 763, Asbestos Hazard Emergency Response Act (AHERA).

A Nevada-licensed asbestos abatement contractor must be used to remove and dispose of RACM prior to disturbance of the materials. Asbestos work activities are categorized according to OSHA 29 CFR 1926.11(b). Class I asbestos work is defined as activities involving the removal of TSI ACM, surfacing ACM, and PACM. Class II asbestos work means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics. Class III asbestos work involves repair and maintenance operations, where ACM, including TSI and surfacing ACM and PACM, is likely to be disturbed, and Class IV asbestos work means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste, and debris resulting from Class I, Class II, and Class III activities.

Federal law requires that asbestos control professionals must be trained on how to properly inspect for the presence of asbestos and to repair and remove it. Training for asbestos abatement professionals is required under AHERA, which is the authority under which EPA issued the EPA Asbestos Model Accreditation Plan (MAP) (40 CFR Part 763, Appendix C to Subpart E). Individuals seeking accreditation as asbestos abatement workers shall complete at least a 4-day training course as outlined in 40 CFR Part 763, Appendix C to Subpart E. The 4-day worker training course shall include lectures, demonstrations, and at least 14 hours of hands-on training.

After ACM removal is considered complete, a post-abatement visual assessment conducted by a Nevada-licensed asbestos project monitor is required to establish that removal has been achieved.

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**Limitations**

This report has been prepared for the exclusive use of ENVIRON International Corporation. The findings presented herein are based upon observations of our field personnel at the time of the visual inspection. All accessible areas of the debris piles were attempted to be visually surveyed for the presence of suspect asbestos-containing materials. However, it is possible that not all suspect ACMs located within the area of the debris piles were identified in this visual inspection.

Our services were performed in accordance with the generally accepted standard of practice at the time this report was written. No warranty, expressed or implied, is intended.

LoSo appreciates being of service to ENVIRON International Corporation on this project. If you have any questions or require additional information, please contact us at (702) 596-2021.

Sincerely,

**Logistical Solutions, LLC**



Kristopher Everett, CEM  
Project Manager  
NV Asbestos Consultant No. IM-1569



Ty L. Salazar, CEM, OHST  
Operations Manager  
NV Asbestos Consultant No. IM-1413

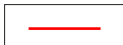
Attachments: Site Plan  
Photograph Log



**LEGEND**

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Location of Debris Piles



Approximate Scale: 1 inch ~ 106 feet



**SITE PLAN**

Nevada Environmental Response Trust  
Remediation Zone RZ-D

Project Number  
CON111106






1. View is northeast at piles of soil, concrete, and asphalt debris.

2. Grout pieces mixed with other concrete debris.



3. View of panel that was similar to that of fiberglass or transite.

<b>SITE PHOTOGRAPHS</b>	
Nevada Environmental Response Trust Remediation Zone RZ-D	
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4. Piece of panel that was similar to that of fiberglass or transite.

5. View of a flat vinyl or synthetic rubber material.



6. View of grey rectangular-shaped panel with screw holes similar to that of fiber cement board.

### SITE PHOTOGRAPHS

Nevada Environmental Response Trust  
Remediation Zone RZ-D

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7. View of a pile of charred material/burn pile.

8. View of another pile of charred material/burn pile.



9. View is a white to grey fibrous material.

**SITE PHOTOGRAPHS**

Nevada Environmental Response Trust  
Remediation Zone RZ-D

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