

Section 112 of the CAA - Air Toxics Regulation for Asbestos
National Emission Standards for Hazardous Air Pollutants (NESHAP)
Renovation and Demolition of WORKSITE Inspection Report
Region 10 EPA

INSPECTION INFORMATION					
1.	Date of Inspection:	4/4/2023	2.	Inspection Number:	20230404-001kmf
3.	Inspection start time:	2:20 p.m.			
4.	Inspector(s):	Other Inspector(s) Name(s): N/A EPA Inspector(s) Name(s): John Pavitt, Alyson Skeens, and Kim Farnham			
5.	Name of Operator:	Asbestos Central LLC			
6.	Type of Operator:	Asbestos Abatement Renovation			
7.	Facility Site/Location:	Other			
		Facility Name:	Lake Roosevelt High School CTE Building		
		Street Address:	505 Crest Drive		
		City:	Coulee Dam	State:	WA
		County:	Okanogan/ Grant	Zip:	99116
		Building Size (square feet):	UNKNOWN	# Of Floors	2
		Age of Facility:	UNKNOWN	Present Use:	Education
8.	Owner of Facility:	Point of Contact:	UNKNOWN		
		Telephone Number:	UNKNOWN		
		Email:	UNKNOWN		
		Company Name:	Coulee Dam School District		
		Street Address:	110 Stevens Avenue		
		City:	Coulee Dam		
		State:	WA	Zip:	99116

9.	Physical Address of Operator:	Point of Contact:	Justin Wood		
		Telephone Number:	(509) 860-3519		
		Email:	justin@a-central.com		
		Company Name:	Asbestos Central LLC		
		Street Address:	1509 S Wenatchee Avenue		
		City:	Wenatchee		
		State:	WA	Zip:	98801
10.	Mailing Address of Operator: (If not same as Physical Address)	Point of Contact:	Same as above		
		Telephone Number:			
		Email:			
		Company Name:			
		Street Address:			
		City:			
		State:		Zip:	
11.	Latitude: 47.403044 Longitude: -120.298816 County: Chelan				
12.	Inspection was:	☐ Announced		☒ Unannounced	
13.	If scheduled, when and how?		Method: N/A		Date: Click or tap to enter a date.

14.	Person(s) interviewed during inspection:			
	FIRST, MIDDLE AND LAST NAME	TITLE	TELEPHONE	EMAIL
	Joe Greek	Foreman	(509) 888-5542	

GENERAL BUSINESS INFORMATION

15.	Business Name as it is on the Business License:	Asbestos Central LLC
	Business owner:	Justin Wood
	Type of business:	Asbestos Abatement Company
	Date business opened:	9/9/2020
	Number of certified asbestos supervisors on staff at the time of this inspection:	2
	Number of certified asbestos workers on staff at the time of this inspection:	7

OPENING CONFERENCE

Region 10 inspection of Asbestos Abatement companies is to monitor compliance with the EPA Asbestos Renovation and Demolition of Buildings promulgated under Section 112 of the CAA (42 U.S.C. 7401) Asbestos NESHAP of 1973. EPA promulgated the Asbestos NESHAP, currently found in 40 CFR Part 61, Subpart M.

16.	☒ I explained the purpose of my visit was to determine compliance with Section 112 of the CAA NESHAP, Asbestos Renovation and Demolition of Buildings, currently found in 40 CFR Part 61, Subpart M.
	☒ I explained I would be requesting contracts and associated records demonstrating compliance with 40 CFR Part 61, Subpart M.
	☒ I provided a copy of the 40 CFR Part 61, Subpart M, the U.S. EPA Small Business Resources Information Sheet, and information about claiming CBI.

ASBESTOS SUPERVISOR / WORKER CERTIFICATIONS:

17.	Asbestos Contractor/ Supervisor	Name: Joe Greek - Supervisor LNI certification	Cert Number:	ABAS00028119	Exp. date:	7/23/2023
	Asbestos Abatement Worker	Name: Alberto Ceja - Worker trainer certification	Cert Number:	NES-AWT11-4-2022-1	Exp. date:	11/4/2023
	Asbestos Abatement Worker	Name: Benjamin Knight - Worker LNI certification	Cert Number:	ABAW00039180	Exp. date:	2/10/2024
	Asbestos Abatement Worker	Name: Zachariah Melton - Worker LNI certification	Cert Number:	ABAW00039803	Exp. date:	11/4/2023
	Asbestos Abatement Worker	Name: Omar Ramirez - Worker trainer certification	Cert Number:	ASI-CAS-23-009	Exp. date:	3/16/2024

ASBESTOS ABATMENT REGULATED WORKSITE INFORMATION:

18.	Facility address:	Lake Roosevelt High School CTE Building, 505 Crest Drive, Coulee Dam, Washington		
	Facility Owner(s) Name(s):	Coulee Dam School District	Previous / Current Use:	Education
	Notification Date:	March 6, 2023	At least 80 linear meters (260 linear feet) on pipes?	No
	At least 15 square meters (160 square feet) on other facility components	Yes	At least 1 cubic meter (35 cubic feet) off facility components where the length or area could not be measured previously?	N/A
	Brief scope of work: Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II non-friable ACM:	Provide the removal and disposal of the following asbestos-containing materials (ACMs) as identified in the "Asbestos Abatement & Remediation Work Plan" provided by Fulcrum Environmental Consulting, dated February 1, 2023. Wet manual methods, HEPA vacuum, double bagged properly labeled waste.		
	Name, address, and telephone number of the waste transporter.	Asbestos Central LLC PO Box 1764 Wenatchee, WA 98807		
	Name and location of the waste disposal site where the asbestos-containing waste material will be deposited.	Greater Wenatchee Landfill 191 Webb Road East Wenatchee, WA 98802		
	Scheduled Date of Demo or Renovation Start Date:	3/27/2023	Scheduled Date of Demo or Renovation Complete Date:	4/14/2023
	Date for Asbestos Removal Start Date:	3/27/2023	Date for Asbestos Removal Complete Date:	4/14/2023
	Type of Operation (Select one)	Renovation	Asbestos Present?	Yes

ASBESTOS ANALYTICAL RESULTS FOR REGULATED WORKSITE ABOVE:		
19.	Copy of analytical results for asbestos provided.	☐ YES ☒ NO ☐ N/A
20.	Analytical results made for asbestos prior to the abatement work.	☒ YES ☐ NO ☐ N/A
Approximate amount of Asbestos Materials: RACM to be Removed: Pipes (linear feet): Surface Area (square feet): 2750 Facility Components (cubic feet): Additional Comments: Fulcrum completed an asbestos inspection of the Lake Roosevelt High School on October 19, 2012. According to the report, there are various 9-inch and 12-inch vinyl tile and associated adhesives. Materials and		

quantities:

Room 102 - vinyl floor tile and adhesive - 1,725 square feet

Room 102 - joint compound on gypsum wallboard walls and ceilings - 1,300 square feet

Room 102 - Ebonite countertop - 1 each

Room 102 - hard mudded insulation on JETs - 10 each

Vinyl floor tile and associated adhesives on concrete - main hallway, approx 950 SF; Vinyl floor tile and associated adhesives on concrete - lower-level hallway, approx 1,800 SF.

Non-Friable Asbestos Material NOT to be Removed: N/A

Pipes (linear feet/ Ln M): Surface Area (square feet/Sq M):

Facility Components (cubic feet/Cu M):

Additional Comments:

Non-Friable Asbestos Material to be Removed: N/A

Pipes (linear feet/ Ln M): Surface Area (square feet/Sq M):

Facility Components (cubic feet/Cu M):

Additional Comments:

ASBESTOS RECORDKEEPING COLLECTED FOR REGULATED WORKSITE ABOVE:

21.	Copy of the contract/work order authorization.	☐ YES ☒ NO ☐ N/A
22.	Copy of invoices/receipts for asbestos abatement work.	☐ YES ☒ NO ☐ N/A
23.	List of subcontractors utilized. Asbestos Central LLC is the subcontractor for Fulcrum Environmental Consulting.	☐ YES ☒ NO ☐ N/A

Additional Comments:

Documentation not collected during the inspection was requested from Asbestos Central LLC by April 26, 2023.

ASBESTOS ABATEMENT NOTIFICATION FOR REGULATED WORKSITE ABOVE:

Asbestos Abatement Notification Provided During Inspection? ☐ YES ☐ NO ☒ N/A

If no, provide comments: EPA received the notification from Department of Ecology Central Regional Office on

March 6, 2023.		
Postmark or deliver the notice as follows:		
24.	At least 10 working days before asbestos stripping or removal work or any other activity begins (such as site preparation that would break up, dislodge or similarly disturb asbestos material), if the operation is as described in paragraph (a)(1) and (a)(4) (except (a)(4)(iii) and (a)(4)(iv) of this section. If the operation is as described in paragraph (a)(2) of this section, notification is required 10 working days before demolition begins.	☒ YES ☐ NO ☐ N/A
25.	At least 10 working days before the end of the calendar year preceding the year for which notice is being given for renovations described in paragraph (a)(4)(iii).	☐ YES ☐ NO ☒ N/A
26.	As early as possible before, but not later than, the following working day if the operation is a demolition ordered according to paragraph (a)(3) of this section or, if the operation is a renovation described in paragraph (a)(4)(iv).	☐ YES ☐ NO ☒ N/A
27.	For asbestos stripping or removal work in a demolition or renovation operation, described in paragraphs (a)(1) and (a)(4) (except (a)(4)(iii) and (a)(4)(iv)), and for a demolition described in paragraph (a)(2), that will begin on a date other than the one contained in the original notice, notice of the new start date must be provided to the Administrator:	☐ YES ☐ NO ☒ N/A
28.	When the asbestos stripping or removal operation or demolition operation will begin after the date contained in the notice: Notify the Administrator of the new start date by telephone as soon as possible before the original start date, and Provide the Administrator with a written notice of the new start date as soon as possible before, and no later than, the original start date. Delivery of the updated notice by the U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.	☐ YES ☐ NO ☒ N/A ☐ YES ☐ NO ☒ N/A
29.	When the asbestos stripping or removal operation or demolition operation covered by this paragraph will begin on a date earlier than the original start date: Provide the Administrator with a written notice of the new start date at least 10 working days before asbestos stripping or removal work begins. For demolitions covered by paragraph (a)(2) of this section, provide the Administrator written notice of a new start date at least 10 working days before commencement of demolition. Delivery of the updated notice by the U.S. Postal Service, commercial delivery service, or hand delivery is acceptable.	☐ YES ☐ NO ☒ N/A ☐ YES ☐ NO ☒ N/A
30.	In no event shall an operation covered by this paragraph begin on a date other than the date contained in the written notice of the new start date.	☒ YES ☐ NO ☐ N/A
Additional Information: Juan Amezcua-Ceja - Supervisor LNI certification - ABAS00036871 - Expires 2/26/2024 Milton Sotelo - Worker trainer certification - 185569 - Expires June 24, 2023 Marco Gaytan-Vammen - Worker LNI certification - ABAW00039181 - Expires 2/10/2024 Douglas Summers - Worker LNI certification - ABAW00037243 - Expires 12/31/2023		

At time of inspection, Asbestos Central LLC had two asbestos supervisors and seven asbestos workers.

During the onsite inspection on April 4, 2023, Mr. Joseph Greek, Foreman, Asbestos Central LLC, confirmed that phase one scope of work would be completed on April 5, 2023. The work completed would be the removal of vinyl floor tile and associated adhesives on concrete - main hallway, approx 950 SF; and vinyl floor tile and associated adhesives on concrete - lower-level hallway, approx 1,800 SF.

The scope of work attached to the asbestos notification also included approximate 1,725 SF of vinyl floor tile and associated adhesives on concrete; approximately 1,300 SF of gypsum wallboard walls with ACM joint compound; quantity of one ebonite countertop; and quantity of 10 hard mudded insulation on JETs all in room 102 to be removed. Although this scope of work was included in the Asbestos Notification of Demolition and Renovation, Mr. Greek said this phase two scope of work would not be completed until the summer when the students would be out of school.

ASBESTOS ABATEMENT NOTIFICATION CONTENT FOR WORKSITE ABOVE

31.	Is the notice the original or a revised notification? Original	☒ YES ☐ NO ☐ N/A
32.	Name, address, and telephone number of both the facility owner and operator and the asbestos removal contractor owner or operator.	☒ YES ☐ NO ☐ N/A
33.	Type of operation: demolition or renovation. Renovation	☒ YES ☐ NO ☐ N/A
34.	Description of the facility or affected part of the facility including the size (square meters [square feet] and number of floors), age, and present and prior use of the facility.	☒ YES ☐ NO ☐ N/A
35.	Procedure, including analytical methods, employed to detect the presence of RACM and Category I and Category II nonfriable ACM.	☒ YES ☐ NO ☐ N/A
36.	Estimate of the approximate amount of RACM to be removed from the facility in terms of length of pipe in linear meters (linear feet), surface area in square meters (square feet) on other facility components, or volume in cubic meters (cubic feet) if off the facility components. Also, estimate the approximate amount of Category I and Category II nonfriable ACM in the affected part of the facility that will not be removed before demolition.	☒ YES ☐ NO ☐ N/A
37.	Location and street address (including building number or name and floor or room number, if appropriate), city, county, and state, of the facility being demolished or renovated.	☒ YES ☐ NO ☐ N/A
38.	Scheduled starting and completion dates of asbestos removal work (or any other activity, such as site preparation that would break up, dislodge, or similarly disturb asbestos material) in a demolition or renovation; planned renovation operations involving individual nonscheduled operations shall only include the beginning and ending dates of the report period as described in paragraph (a)(4)(iii).	☒ YES ☐ NO ☐ N/A
39.	Scheduled starting and completion dates of demolition or renovation.	☒ YES ☐ NO ☐ N/A
40.	Description of planned demolition or renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components.	☒ YES ☐ NO ☐ N/A

41.	Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste-handling emission control procedures.	☒ YES ☐ NO ☐ N/A
42.	Name and location of the waste disposal site where the asbestos-containing waste material will be deposited. Greater Wenatchee Regional Landfill and Recycling Center	☒ YES ☐ NO ☐ N/A
43.	A certification that at least one person trained as required by paragraph (c)(8) will supervise the stripping and removal described by this notification.	☒ YES ☐ NO ☐ N/A
44.	For facilities described in paragraph (a)(3) of this section, the name, title, and authority of the State or local government representative who has ordered the demolition, the date that the order was issued, and the date on which the demolition was ordered to begin. A copy of the order shall be attached to the notification.	☐ YES ☐ NO ☒ N/A
45.	For emergency renovations described in paragraph (a)(4)(iv), the date and hour that the emergency occurred, a description of the sudden, unexpected event, and an explanation of how the event caused an unsafe condition, or would cause equipment damage or an unreasonable financial burden.	☐ YES ☐ NO ☒ N/A
46.	Description of procedures to be followed in the event that unexpected RACM is found or Category II nonfriable ACM becomes crumbled, pulverized, or reduced to powder. Notification states they will "keep wet until proper clean-up and disposal."	☒ YES ☐ NO ☐ N/A
47.	Name, address, and telephone number of the waste transporter.	☒ YES ☐ NO ☐ N/A
Additional Comments:		

ASBESTOS ABATEMENT WORK STANDARDS – PROCEDURES FOR ASBESTOS EMISSION CONTROL		
48.	Each owner or operator of a demolition or renovation activity, according to paragraph (a), shall comply with the following procedures: Remove all RACM from a facility being demolished or renovated before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal. RACM need not be removed from demolition if:	☒ YES ☐ NO ☐ N/A
48a.	It is Category I nonfriable ACM that is not in poor condition and is not friable.	☐ YES ☐ NO ☒ N/A
48b.	It is on a facility component that is encased in concrete or other similarly hard material and is adequately wet whenever exposed during demolition	☐ YES ☐ NO ☒ N/A
48c.	It was not accessible for testing and was, therefore, not discovered until after demolition began and, as a result of the demolition, the material cannot be	☐ YES ☐ NO ☒ N/A

	safely removed. If not removed for safety reasons, the exposed RACM and any asbestos-contaminated debris must be treated as asbestos-containing waste material and adequately wet at all times until disposed of.	
48d.	They are Category II nonfriable ACM and the probability is low that the materials will become crumbled, pulverized, or reduced to powder during demolition	☐ YES ☐ NO ☒ N/A
49.	When a facility component that contains, is covered with, or is coated with RACM is being taken out of the facility as a unit or in sections:	☒ YES ☐ NO ☐ N/A
49a.	Adequately wet all RACM exposed during cutting or disjoining operations, and	☒ YES ☐ NO ☐ N/A
49b.	Carefully lower each unit or section to the floor and to ground level, not dropping, throwing, sliding, or otherwise damaging or disturbing the RACM	☐ YES ☐ NO ☒ N/A
50.	When RACM is stripped from a facility component while it remains in place in the facility, adequately wet the RACM during the stripping operation.	☐ YES ☐ NO ☒ N/A
50a.	In renovation operations, wetting is not required if: The owner or operator has obtained prior written approval from the Administrator based on a written application that wetting to comply would unavoidably damage equipment or present a safety hazard.	☐ YES ☐ NO ☒ N/A
50b.	The owner or operator uses one of the following emission control methods: A local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the stripping and removal of the asbestos materials. The system must exhibit no visible emissions to the outside air or be designed and operated in accordance with the requirements in § 61.152.	☐ YES ☐ NO ☒ N/A
50c.	A glove-bag system designed and operated to contain the particulate asbestos material produced by the stripping of the asbestos materials.	☐ YES ☐ NO ☒ N/A
50d.	Leak-tight wrapping to contain all RACM prior to dismantlement.	☐ YES ☐ NO ☒ N/A
51	In renovation operations where wetting would result in equipment damage or a safety hazard, and the methods allowed in paragraph (c)(3)(i) cannot be used, another method may be used after obtaining written approval from the Administrator based upon a determination that it is equivalent to wetting in controlling emissions or to the methods allowed in paragraph (c)(3)(i).	☐ YES ☐ NO ☒ N/A
51a	A copy of the Administrator's written approval shall be kept at the worksite and made available for inspection.	☐ YES ☐ NO ☒ N/A
52	After a facility component covered with, coated with, or containing RACM has been taken out of the facility as a unit or in sections pursuant to paragraph (c)(2), it shall be stripped or contained in leak-tight wrapping, except as described in paragraph (c)(5). If stripped, either:	☐ YES ☐ NO ☒ N/A
52a.	Adequately wet the RACM during stripping, or	☐ YES ☐ NO ☒ N/A
52b.	Use a local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the stripping. The system must exhibit no visible emissions to the outside air or be designed and operated in accordance with the requirements in § 61.152.	☐ YES ☐ NO ☒ N/A
53.	For large facility components such as reactor vessels, large tanks, and steam generators, but not beams (which must be handled in accordance with paragraphs (c)(2), (c)(3), and (c)(4), the RACM is not required to be stripped if the following requirements are met:	☐ YES ☐ NO ☒ N/A
53a.	The component is removed, transported, stored, disposed of, or reused without disturbing or damaging the RACM.	☐ YES ☐ NO ☒ N/A

53b.	The component is encased in a leak-tight wrapping.	☐ YES ☐ NO ☒ N/A
53c.	The leak-tight wrapping is labeled according to § 61.149(d)(1)(i), (d)(1)(ii), and (d)(1)(iii) during all loading and unloading operations and during storage.	☒ YES ☐ NO ☐ N/A
54.	For all RACM, including material that has been removed or stripped:	☒ YES ☐ NO ☐ N/A
54a.	Adequately wet the material and ensure that it remains wet until collected and contained or treated in preparation for disposal in accordance with § 61.150; and	☒ YES ☐ NO ☐ N/A
54b.	Carefully lower the material to the ground and floor, not dropping, throwing, sliding, or otherwise damaging or disturbing the material.	☐ YES ☐ NO ☒ N/A
54c.	Transport the material to the ground via leak-tight chutes or containers if it has been removed or stripped more than 50 feet above ground level and was not removed as units or in sections.	☐ YES ☐ NO ☒ N/A
54d.	RACM contained in leak-tight wrapping that has been removed in accordance with paragraphs (c)(4) and (c)(3)(i)(B)(3) need not be wetted.	☐ YES ☐ NO ☒ N/A
55.	When the temperature at the point of wetting is below 0 °C (32 °F):	☐ YES ☐ NO ☒ N/A
55a.	The owner or operator need not comply with paragraph (c)(2)(i) and the wetting provisions of paragraph (c)(3).	
55b.	The owner or operator shall remove facility components containing, coated with, or covered with RACM as units or in sections to the maximum extent possible.	☐ YES ☐ NO ☒ N/A
55c.	During periods when wetting operations are suspended due to freezing temperatures, the owner or operator must record the temperature in the area containing the facility components at the beginning, middle, and end of each workday and keep daily temperature records available for inspection by the Administrator during normal business hours at the demolition or renovation site.	☐ YES ☐ NO ☒ N/A
	The owner or operator shall retain the temperature records for at least 2 years .	☐ YES ☐ NO ☒ N/A
56.	No RACM shall be stripped, removed, or otherwise handled or disturbed at a facility unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them, is present.	☐ YES ☐ NO ☒ N/A
56a.	Every 2 years, the trained on-site individual shall receive refresher training in the provisions of this regulation. The required training shall include as a minimum: applicability; notifications; material identification; control procedures for removals including, at least, wetting, local exhaust ventilation, negative pressure enclosures, glove-bag procedures, and High Efficiency Particulate Air (HEPA) filters; waste disposal work practices; reporting and recordkeeping; and asbestos hazards and worker protection.	☐ YES ☐ NO ☒ N/A
56b.	Evidence that the required training has been completed shall be posted and made available for inspection by the Administrator at the demolition or renovation site.	☒ YES ☐ NO ☐ N/A
57.	For facilities described in paragraph (a)(3), adequately wet the portion of the facility that contains RACM during the wrecking operation.	☐ YES ☐ NO ☒ N/A
58.	If a facility is demolished by intentional burning, all RACM including Category I and Category II nonfriable ACM must be removed in accordance with the NESHAP before burning.	☐ YES ☐ NO ☒ N/A
59.	Additional Comments:	

STANDARD FOR WASTE DISPOSAL FOR DEMOLITION AND RENOVATION		
60.	Each owner or operator of any source covered under the provisions of § 61.145 shall comply with the following provisions:	☒ YES ☐ NO ☐ N/A
61.	Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source or use one of the emission control and waste treatment methods specified in paragraphs (a)(1) through (a)(4).	☒ YES ☐ NO ☐ N/A
62.	Adequately wet asbestos-containing waste material as follows:	☒ YES ☐ NO ☐ N/A
62a.	Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and	☒ YES ☐ NO ☐ N/A
62b.	Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and	☒ YES ☐ NO ☐ N/A
62c.	After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and	☒ YES ☐ NO ☐ N/A
62d.	Label the containers or wrapped materials specified in paragraph (a)(1)(iii) using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.100(j)(4) or 1926.1101(k)(8). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.	☒ YES ☐ NO ☐ N/A
62e.	For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.	☒ YES ☐ NO ☐ N/A
63.	Process asbestos-containing waste material into nonfriable forms as follows:	☐ YES ☐ NO ☒ N/A
63a.	Form all asbestos-containing waste material into nonfriable pellets or other shapes;	☐ YES ☐ NO ☒ N/A
63b.	Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by § 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air.	☐ YES ☐ NO ☒ N/A
64.	For facilities demolished where the RACM is not removed prior to demolition according to § 61.145(c)(1)(i), (c)(1)(ii), (c)(1)(iii), (c)(1)(iv) or for facilities demolished according to § 61.145(c)(9), adequately wet asbestos-containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.	☐ YES ☐ NO ☒ N/A
65.	Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in § 61.149(c)(2).	☐ YES ☐ NO ☒ N/A
66.	As applied to demolition and renovation, the requirements of paragraph (a) do not apply to Category I nonfriable ACM waste and Category II nonfriable ACM waste that did not become crumbled, pulverized, or reduced to powder.	☐ YES ☐ NO ☒ N/A
67.	All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator:	☒ YES ☐ NO ☐ N/A
67a.	A waste disposal site operated in accordance with the provisions of § 61.154, or	☒ YES ☐ NO ☐ N/A

67b.	An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of § 61.155.	☐ YES ☐ NO ☒ N/A
67c.	The requirements of paragraph (b) do not apply to Category I nonfriable ACM that is not RACM.	☐ YES ☐ NO ☒ N/A
68.	Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of § 61.149(d)(1)(i), § 61.149(d)(1)(ii), and 61.149(d)(1)(iii).	☒ YES ☐ NO ☐ N/A
69.	For all asbestos-containing waste material transported off the facility site: Maintain waste shipment records, using a form similar to that shown by EPA, and include the following information:	☒ YES ☐ NO ☐ N/A
69a.	The name, address, and telephone number of the waste generator.	☒ YES ☐ NO ☐ N/A
69b.	The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.	☒ YES ☐ NO ☐ N/A
69c.	The approximate quantity in cubic meters (cubic yards).	☒ YES ☐ NO ☐ N/A
69d.	The name and physical site location of the disposal site.	☒ YES ☐ NO ☐ N/A
69e.	The date transported.	☒ YES ☐ NO ☐ N/A
69f.	The name, address, and telephone number of the transporter(s).	☒ YES ☐ NO ☐ N/A
70.	Provide a copy of the waste shipment record, described in paragraph (d)(1) to the disposal site owners or operators at the same time as the asbestos-containing waste material is delivered to the disposal site.	☒ YES ☐ NO ☐ N/A
71.	For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.	☒ YES ☐ NO ☐ N/A
72.	Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter, include in the report the following information:	☐ YES ☐ NO ☒ N/A
72a.	A copy of the waste shipment record for which a confirmation of delivery was not received, and	☐ YES ☐ NO ☒ N/A
72b.	A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.	☐ YES ☐ NO ☒ N/A
73.	Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years .	☒ YES ☐ NO ☐ N/A
74.	Furnish upon request, and make available for inspection by the Administrator, all records required under this section.	☒ YES ☐ NO ☐ N/A

OTHER INFORMATION / REVIEW COLLECTED DURING INSPECTION

Use this section to enter all pertinent information not collected in the body of the inspection report.

Mr. Joseph Greek confirmed he was the foreman working for Asbestos Central, and that Just Right Cleaning & Construction (JRCC) hired the company as a subcontractor. Mr. Greek was the asbestos abatement supervisor onsite and said he had ten workers at time of inspection. Copies of certifications provided after the inspection included two supervisors and seven workers, however Mr. Greek stated during the inspection that he had 10 individuals performing the abatement work, five employees upstairs and five downstairs.

Mr. Greek said that Mr. Justin Wood was the owner of the company. Mr. Greek stated the asbestos abatement job at Lake Roosevelt High School started on Monday, April 3, 2023, and confirmed the completion date to April 5, 2023. EPA was informed that the visual inspection was to be completed on the day of inspection. After the inspection the company would spray the encapsulate and air samples would be taken on Thursday, April 6, 2023.

Mr. Greek explained that the company was utilizing the airless sprayer to keep the asbestos moist while removing the asbestos. He said that the 24" grinding machine utilized to remove the vinyl flooring with mastic was attached to a water drip system. The water drip had to be calibrated to be just enough water but not too much water. The HEPA vacuum being used was a self bagging system. Mr. Greek stated he had three negative air downstairs, two running and one backup. In the workspace there are three air scrubbers that clean the air and move the air around.

The following information was also conveyed during the inspection:

- The work practice requirement during the demolition and/or renovation of asbestos abatement.
- The certification requirements for supervisor and workers.
- The recordkeeping requirements for all asbestos abatement work.
- Retain a copy of all monitoring and inspection records for at least 2 years.
- The 10-day notification required prior to the asbestos abatement work starting.

SUMMARY OF OBSERVATIONS

The following possible deviations from the requirements of 40 CFR Part 745 Subpart E were observed during this inspection/audit:

At time of inspection, EPA was informed there were 10 individuals performing the asbestos abatement. The certifications provided had two supervisors and seven workers. Three of the workers did not hold the LNI worker certification cards, because EPA was provided copies of the trainer certifications only.

The notification provided did not have the contact information for the building owner. The notification did not have the year built, the square footage or the number of floors of the building. There was no description of the planned demolition or renovation work and the methods to be used.

The notification did not have the correct amount of asbestos to be removed at time of inspection. The notification included 5,775 square feet, 1 Ebonite cuntertop, and 10 each hard mudded insulation on JETs to be removed. At time of inspection only 3,025 of square feet of ACM was to be removed, and the rest to be removed during the summer when students were out of school.

The start and completion date of the abatement job was not correct on the notification. During the inspection, EPA was informed that the abatement job started April 3, 2023 and was to be completed on April 5, 2023, but the notification had the start date as March 27, 2023 and completion on April 14, 2023.

During the inspection, two EPA inspectors entered the containment area established by Asbestos Central. Approximate time of entry into the containment was 3:29 p.m. and exiting the containment area was about 3:45 p.m. While walking through the containment area, the inspectors located issues with the containment such as small holes in the critical barriers and places where critical barriers had detached from the floor. Mr. Greek said that the holes were probably made by the hot muffler from the grinder coming into contact with the plastic.

1. Photo: P4040017; Date: Tuesday, April 4, 2023; Time: 3:32 p.m. Inside containment area, 1st floor hallway. Small hole found in critical barrier at wall bottom.
2. Photo: P4040018; Date: Tuesday, April 4, 2023; Time: 3:32 p.m. Inside containment area 1st floor hallway. Second small hole found in critical barrier, at wall bottom.
3. Photo: P4040020; Date: Tuesday, April 4, 2023; Time: 3:32 p.m. Inside containment area 1st floor hallway. Same small hole in barrier as Photo P4040019.
4. Photo: P4040022; Date: Tuesday, April 4, 2023; Time: 3:33 p.m. Inside containment area 1st floor hallway. Small hole observed in critical barrier where wires pass through.
5. Photo: P4040025; Date: Tuesday, April 4, 2023; Time: 3:34 p.m. Inside containment area 1st floor hallway. Fifth hole in critical barrier, this one cuts through two layers of plastic.
6. Photo: P4040028; Date: Tuesday, April 4, 2023; Time: 3:35 p.m. Inside containment area 1st floor hallway. Small hole observed in critical barrier where wires pass through.
7. Photo: P4040030; Date: Tuesday, April 4, 2023; Time: 3:35 p.m. Inside containment area 1st floor hallway. Tape has pulled away from the bottom of the wall.

CLOSING CONFERENCE

At the closing conference, I reviewed the observations and/or any concerns with the company. I also explained that after all information has been reviewed and evaluated, that an EPA Compliance Officer will be notifying the company of EPA's determination and whether any further action was required.

Inspection Completion Time:

4:00 p.m.

ATTACHMENTS

A	Business Information
B	Analytical results for asbestos
C	Asbestos abatement notification
D	Asbestos abatement contract
E	Supervisor / Worker Certification
F	Fulcrum Environmental Consulting Asbestos Abatement and Remediation Work Plan
G	Waste Shipment Records
H	
I	

J	List of Other Documents: 1. 2. 3. 4. 5.
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REPORT SUBMITTED BY		
Inspector's Signature:	KIM FARNHAM  Digitally signed by KIM FARNHAM Date: 2023.05.24 11:56:59 -07'00'	
Peer Reviewer's Signature:	JOHN PAVITT  Digitally signed by JOHN PAVITT Date: 2023.05.26 12:35:06 -08'00'	
Manager's Signature:	MORGAN JENCIUS  Digitally signed by MORGAN JENCIUS Date: 2023.05.30 08:32:29 -07'00'	