



Clean Air Act Asbestos NESHAP Compliance Evaluation Inspection Report

Key Financial Center

702 West Idaho Street
Boise, Idaho

Inspection Date: November 6, 2024

ALYSON SKEENS Digitally signed by ALYSON SKEENS
Date: 2025.01.14 08:09:09 -07'00'

Report Author Signature

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Attachments

Attachment 1	Notification of Renovation, Original
Attachment 2	Notification of Renovation, Revision 1
Attachment 3	Inspection Digital Image Log

1. Facility and Inspection Information

Facility Owner: Rafanelli & Nahas
702 West Idaho Suite 825
Boise, Idaho 83702

Facility Location: Key Financial Center
702 West Idaho Street
Boise, Idaho 83702

Abatement Contractor: Abatement Pro, Inc.
5470 West Albatros Lane
Boise, Idaho 83705

Andy Jordan
Operational Manager and Vice President
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DJ Welch
Vice President
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Juan Hernandez
On-site supervisor

NAICS: 562910 – Remediation Services

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Date of Inspection: November 6, 2024

Inspection Start/End Times: 10:00 – 11:15

Inspection Notice: Unannounced

Were samples collected for this inspection? No

Were any sample results positive for asbestos? N/A

2. Introduction

The purpose of this inspection was to determine compliance with the Clean Air Act (CAA), National Emission Standard Asbestos (“asbestos NESHAP”) (40 CFR Part 61, Subpart M), which applies to renovation and demolition activities which may disturb asbestos at a “facility” as defined in the asbestos NESHAP.

This inspection was led by Alyson Skeens; Andrew Gregory was present for the inspection.

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection and from records review. The information provided does not constitute a final decision on compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

3. Compliance History

A review of EPA’s Enforcement and Compliance History Online (ECHO) database¹ showed Abatement Pro, Inc. has not had informal or formal enforcement actions in the last five years.

4. Pre-Inspection Records Review

The asbestos NESHAP requires the owner or operator to provide the U.S. Environmental Protection Agency (“EPA”) with written notice of intention to demolish or renovate a facility. The notice is to be mailed in at least 10 working days before asbestos materials are disturbed. The notice is to be updated as necessary.

On October 3, 2024 Abatement Pro submitted a notice to EPA R10 for a floor renovation project on the 12th floor of the Key Financial Center in Boise, Idaho Attachment 1. The Key Financial Center is a 13-floor office building owned by Rafanelli & Nahas. The notice stated 9,000 square feet of floor tile and mastic was to be abated from the 12th floor. Grinding was listed as a work

¹ See <https://echo.epa.gov/>.

method on the notice. The notice stated the materials were test via PLM EPA/600/R-93 116. Waste disposal site listed was Ada County Landfill.

On October 22, 2024 Abatement Pro submitted a revised noticed stating abatement dates were updated, Attachment 2. I reviewed both notices and observed the revised notice had a different renovation start date. Submittal date, and work dates are summarized in the table below.

Notice Type	Submittal Date	Asbestos Start and End Dates	Renovation Start and End Dates
Original	October 2, 2024	Start: November 4, 2024 End: November 15, 2024	Start: October 16, 2024 End: November 15, 2024
Revision	October 22, 2024	Start: November 4, 2024 End: November 15, 2024	Start: October 28, 2024 End: November 15, 2024

5. Inspection Elements/Order

Pre-Inspection Observations

Inspector Gregory and I parked at corner of North Capital Boulevard and West Idaho Street. I observed construction work on the building's external structures along W. Idaho St. I observed a temporary entrance sign, blue scissor lifts, workers in level D PPE and OSB Sheathing over windows.

Entry and Opening Conference with Facility Representatives

Inspector Gregory and I walked into the temporary entrance at Key Financial Center at approximately 10:00. Upon entering the building, we went left towards the elevators. I observed the middle elevator was open with yellow tarp and OSB sheathing on the ground. An OSB sheathing was also blocking door from closing (see photograph PB060003). Shortly after taking a photograph of the elevator, I saw a worker take the elevator. Inspector Gregory and I went to the elevator on the right to go the 12th floor where the notice listed the renovation would be taking place. The elevator button for the 12th floor did not illuminate when pressed and did not move. I went back to the lobby to call the contractor point of contact listed on the notification of renovation. The number went to Abatement Pro's main number. The receptionist stated she would call the on-site supervisor, Juan Hernandez, and have him meet us downstairs.

Mr. Hernandez met us downstairs in the lobby. Inspector Gregory and I introduced ourselves and presented our credentials. I stated EPA received a notice of a floor renovation on the 12th floor of the Key Financial Center and we were there to conduct an unannounced inspection. Mr. Hernandez stated he could take us to the work zone. Mr. Hernandez led inspectors to the middle elevator. Once the doors of the elevator reopened, I observed a barrier with an asbestos work zone sign (see photograph PB060004). I asked if we could go back downstairs to the lobby to conduct the opening conference.

The opening conference began at approximately 10:15; present were myself, Inspector Gregory and Mr. Hernandez. I asked Mr. Hernandez when the project started and what they were currently working on. Mr. Hernandez stated they started last Tuesday and were currently conducting the final clean and vacuum of the space. The asbestos tile has all been removed. I asked if the mastic was also hot. Mr. Hernandez stated he thought the mastic and tile both were hot but was not completely sure. I asked if they were done with the abatement. Mr. Hernandez stated they are hoping they will be done tomorrow. Currently workers are cleaning and planned to run the air samples tomorrow. Mr. Hernandez stated if the samples are clean will tear down barriers on Friday. If they are not, then they will have to reclean and rerun the air monitors.

I stated I saw a terminator in the front lobby, and asked if they used it to remove the tiles. Mr. Hernandez stated they planned to use the terminator, but it did not fit in the elevator. They switched their planned work methods to hand tools such as tile bars and grinders for mastic removal.

I asked if there was negative air pressure being used in the hot zone. Mr. Hernandez stated there was and they had 6 air filters. They were venting the exiting air through two windows. I asked how many workers had been on this project. Mr. Hernandez stated there were three to four workers, but last week there were seven workers. I asked how asbestos containing waste materials were being handled. Mr. Hernandez stated that they were using the standard size asbestos waste bags. They were double bagging the waste, bringing it down the worker elevator and through the main entryway, loaded the waste into their dumpster and then took the loads to Ada County Landfill. I asked how many loads have been taken so far. Mr. Hernandez stated they had taken two loads.

I asked how Abatement Pro prevented people from entering the work site. Mr. Hernandez stated that the building had limited the elevator's access to the 12th floor. Currently, elevators 1 and 3 cannot go to the 12th floor, and elevator 2 can only go to the 12th floor.

I asked if Abatement Pro was hired directly by owner of building or a general contractor. Mr. Hernandez stated he believed they were hired directly by the owner of the building to conduct the abatement. I asked if Abatement Pro has done other work at the Key Financial Center. Mr. Hernandez stated they demolished the awning on building on W. Idaho St. side of building where non-abatement contractors were working. I asked Mr. Hernandez had any questions, and he stated he did not. I stated that I did not have any other questions about the project and was ready to look at the hot zone. Inspector Gregory and I went back to the car to get our PPE.

Facility Walk-Through

Upon returning to the lobby Mr. Hernandez took us back up the 12th floor. I asked Mr. Hernandez if I could see his supervisor credential. Mr. Hernandez said they were on his iPad. Mr. Hernandez looked for a few minutes but could not immediately locate them. I stated we could

wait to see his credential until after we walked through the hot zone, or he could email them to me after the inspection.

Mr. Hernandez entered the hot zone followed by me and then Inspector Gregory. We entered the hot zone at approximately 10:40. We entered a large space without dividing walls. I observed the 3-stage decontamination zone entrance was placed approximately 2/3 to the left along the wall if looking at it from inside the hot zone. There were critical barriers covering walls and windows from floor to ceiling. The flooring was bare concrete without tiles or mastic. I observed two air filtration banks with three filter units on either side of the 3-stage decontamination zone. I observed one worker with a SASE vacuum cleaning the bare concrete floor and two workers cleaning abatement tools on critical barriers. I observed several goosenecked asbestos waste bags staged to leave the hot zone. Looking closely at the floor I observed air vents and holes through the subfloor were covered. Vents for the HVAC system were also covered.

I signaled to Mr. Hernandez that Inspector Gregory and I had completed our inspection of the hot zone. Mr. Hernandez, Inspector Gregory and then I left the hot zone.

Closing Conference

We went downstairs and met Andy Jordan, Operational Manager and Vice President, and DJ Welch, Vice President. Mr. Hernandez showed us his credential on iPad (see photograph PB060022).

I started the closing conference at approximately 11:00; present were myself, Mr. Hernandez. Mr. Jordan and Mr. Welch. I stated that this was an unannounced inspection in order to determine compliance with the asbestos NESHAP. I stated what we observed while on site and I did not have potential compliance concerns based on the on-site visit. I asked if they had any questions; they stated they did not.

I stated that there would be an inspection report documenting the inspection and asked who I should email the inspection report. Mr. Jordan and Mr. Welch said they both would and provided their email address. I observed that Mr. Jordan was using a Pacific Technology Inc (PTI) email and asked how PTI and Abatement Pro were sister companies. Mr. Jordan said PTI is the parent company of Abatement Pro, Inc. and most of the work conducted in the Treasure Valley is done by Abatement Pro.

At this time, I told Mr. Jordan and Mr. Welch we were next going to an abatement being conducted by PTI off of Overland Road and if they would want to meet us there. Mr. Jordan stated they would meet us at the job site.

Inspector Gregory and I left at approximately 11:15.