



Clean Air Act Asbestos NESHAP Compliance Evaluation Inspection Report

Vacant Commercial Building

6225 West Overland Road
Boise, Idaho

Inspection Date: November 6, 2024

ANDREW GREGORY Digitally signed by ANDREW GREGORY
Date: 2025.01.13 17:19:00 -09'00'

Report Author Signature

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Table of Contents

I. Basic Facility and Inspection Information.....	3
II. Purpose of Inspection.....	4
III. Compliance History.....	4
IV. Pre-Inspection Records Review	5
V. Pre-Inspection Observations	5
VI. Inspection Elements/Order	5
A. Entry and Opening Conference	5
B. Facility Walk-Through.....	6
C. Closing Conference	7
VII. Post Inspection Activities.....	8

Attachments

Attachment 1	Notification of Renovation
Attachment 2	Inspection Digital Image Log
Attachment 3	Certificate of Completion

I. Basic Facility and Inspection Information

Facility Location: Commercial Building - Vacant
6225 W Overland Road
Boise, Idaho 83709

Facility Owner: Benjamin Stauss
17 South Wallace St
Boise, Idaho 83705
(208) 576-4765

Abatement Contractor: Pacific Technologies, Inc.
P.O. Box 4846
Boise, Idaho 83711
(208) 344-8668

Andy Jordan
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NAICS: 562910 – Remediation services

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Date of Inspection: November 6, 2024

Inspection Start/End Times: 11:30 AM – 12:40 PM

Inspection Notice: This was an announced inspection. The abatement contractor contacts, Andy Jordan and DJ Welch, were present at an asbestos NESHAP inspection that occurred earlier the same day and were informed of the inspection at the vacant commercial building on Overland Road.

Were samples collected for this inspection? No

Were any sample results positive for asbestos? N/A

II. Purpose of Inspection

The purpose of this inspection was to determine compliance with the Clean Air Act (CAA), National Emission Standard for 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.

Inspector Gregory, U.S. Environmental Protection Agency (EPA) Region 10, led the inspection and was accompanied by Inspector Skeens, EPA Region 8.

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.

III. Compliance History

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

¹ See <https://echo.epa.gov/>.

IV. Pre-Inspection Records Review

The asbestos NESHAP requires the owner or operator to provide the 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 22, 2024, Pacific Technologies, Inc. submitted a notice to EPA R10 for a renovation project at a vacant commercial building on Overland Road in Boise, Idaho (Attachment 1). The vacant commercial building's prior use was a business and is currently owned by Benjamin Stauss. The notice stated the following:

- 1,025 square feet of popcorn ceiling was to be removed between November 5, 2024 and November 8, 2024 from back rooms of the facility.
- Wet methods, negative air machines, and critical barriers were used to prevent emissions of asbestos.
- The waste disposal site is the Ada County Landfill.

V. Pre-Inspection Observations

Inspector Skeens and I met with the abatement contactor representatives, Andy Jordan and DJ Welch, at an earlier asbestos NESHAP inspection that occurred on the same day at the Key Financial Center. The abatement company listed for the Key Financial Center was Abatement Pro, Inc. While at the Key Financial Center, Mr. Jordan and Mr. Welch stated that Pacific Technologies, Inc. is the parent company of Abatement Pro, Inc. and both are represented by Mr. Jordan and Mr. Welch.

We went directly to the facility. No observations were made prior to the inspection. Inspector Skeens and I parked at the existing parking lot directly attached to the facility.

VI. Inspection Elements/Order

The inspection team was escorted by Andy Jordan and DJ Welch during the facility walkthrough. The inspection included a walkthrough of the facility and taking photographs/videos. A digital photo log is Attachment 2 to this report.

A. Entry and Opening Conference

Inspector Skeens and I arrived at the vacant commercial building at 11:30 AM. As we entered the facility to meet with Mr. Jordan and Mr. Welch it was noted there was a waste dump trailer lined with plastic wrapping outside the facility (see photograph PB060023). I presented my credentials to Mr. Jordan and Mr. Welch during an earlier inspection that day at a different facility, the Key Financial Center.

The opening conference was performed inside the vacant commercial building outside of the decontamination zone. Active work could be heard coming from the contamination zone including the sound of a water sprayer and there was warning signage located on the entry to the contamination zone. Present during the opening conference included Mr. Jordan, Mr. Welch, Inspector Skeens, and I. Mr. Jordan and Mr. Welch stated the following regarding the on-going asbestos abatement work during the opening conference:

- Started set up on Monday, November 4, 2024, and the work was intended to be complete on Friday, November 8, 2024.
- The on-going work was removing popcorn off the steel ceiling using a man-made lift. The workers were wetting it via an airless sprayer with surfactant then scrapping it off into bags.
- There were currently 6 workers on site including the on-site supervisor for the asbestos abatement, Gabby Gamino.
- Mr. Jordan stated the asbestos on the ceiling is limited to the backroom and not found in other locations.

The remainder of the facility outside of the contamination and decontamination zone showed signs of previous work including removed floor tiling, removed drywall, exposed wires and fixtures, and removed ceiling tiles (see photographs PB060026 and PB060028). I asked regarding the other work at the facility as it was not described within the asbestos NESHAP notification. Mr. Welch stated Pacific Technologies, Inc. did not perform work on other parts of the building. He walked the facility the week prior and flooring work in the entry way was already completed and he was not aware of who performed the work. An interior demolition was occurring prior and work was stopped when popcorn ceiling was detected. Pacific Technologies, Inc. was contacted by EDEM Holdings for the asbestos work in the backroom popcorn ceiling. I asked whether EDEM Holdings was the owner of the building as the asbestos NESHAP notification states the owner is Benjamin Strauss. Mr. Welch was not aware of the relationship between Benjamin Strauss, EDEM Holdings, or if they are the same. Mr. Welch states that Benjamin Strauss took samples and brought to Atlas for testing and that no additional work was intended after abatement of the ceiling in the backroom.

The closing conference ended at approximately 11: 50 AM and we began the facility walkthrough.

B. Facility Walk-Through

Inspector Skeens and I walked around the outside of the contamination zone along the barrier separating the contamination zone from the rest of the facility. No visible holes were observed within the barrier.

As Inspector Skeens and I donned PPE to enter the contamination zone Mr. Welch stated he e-mailed Gabby Gamino's on-site supervisor certification to Inspector Skeens and I. Inspector Skeens and I entered the contamination zone at 12:00 PM. I made the following observations within the contamination zone where asbestos abatement was actively taking place:

- The contamination zone where asbestos abatement was taking place consisted of one room.
- The walls and floor of the room were lined with plastic which was observed to be in good condition with few holes.
- One worker was spraying water at the active asbestos removal area and around the general area of removal including wetting the waste bags (see photograph PB060029).
- Another worker was on a ladder and using a scrapper to scrap popcorn texture from ceiling.
- The wet popcorn ceiling texture was falling to the floor and landing on the plastic flooring.
- Workers were then using a wiper blade to gather wet popcorn texture on the floor together then using a shovel to pick up texture material to put into waste bags (see photograph PB060033).
- Wetting was occurring constantly.
- The asbestos popcorn texture material was being double bagged into bags labeled to contain asbestos. The bags were observed to be in good condition with no visible holes (see photograph PB060032).
- There was an air filtration system with HEPA filters creating negative air pressure in the contamination zone (see photograph PB060036).
- A man-lift was present, however, not currently being utilized.
- The popcorn texture on the ceiling appears to abruptly stop, contained with the backroom (see photograph PB060034).

Inspector Skeens and I exited the decontamination zone at 12:23 PM and went to inspect the waste dump trailer. Mr. Welch stated the waste trailer is double-lined with plastic liner and workers will put double-bagged waste into the double-lined trailer then burrito the waste for transport. Mr. Welch added that no waste had been sent to a landfill yet. I observed the trailer being labeled with signage stating, “danger”, “do not enter”, and “asbestos” (see photograph PB060040).

The walkthrough ended at 12:30 PM.

C. Closing Conference

At approximately 12:30 PM, Mr. Jordan, Mr. Welch, Inspector Skeens, and I gathered in the facility parking lot to discuss the inspection and conduct the closing conference. I led the closing conference and summarized the parts of the facility we had visited during the inspection and our observations related to asbestos NESHAP. I went through my inspection notes and noted that I did not have potential compliance concerns from the on-site inspection.

Inspector Skeens and I departed the facility at 12:40 PM.

VII. Post Inspection Activities

As Mr. Welch stated during the inspection I received an e-mail with Gabriela “Gabby” Gamino’s Certificate of Completion for on-site asbestos supervisor (Attachment 3). The course certificate indicates that course was titled Oregon Supervisor Refresher Asbestos Course in Vale, Oregon and was valid during the inspection as the expiration date is on May 3, 2025.