



Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Clean Air Act Asbestos NESHAP Compliance Inspection Report

Peach Investment Corp
Adjacent Properties Located at
608, 630 and 646 W. 4th Ave.
Anchorage, Alaska

Inspection Date: July 29, 2022

JOHN PAVITT

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Date: 2022.10.03 08:58:00 -08'00'

Report Author Signature

Date

John Pavitt
Asbestos NESHAP Inspector
EPA Region 10

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1. Facility and Inspection Information

Facility Owner: Peach Investment Corp.
3000 C Street, Suite 105
Anchorage, AK 99503

AFS/FRS Number: None

Abatement and Demolition Contractor: Central Environmental Inc. (CEI)
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Other Operator: None

NAICS: 236220 Commercial and Institutional Building Construction

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Date of Inspection: 07/29/2022

Date of Report: 10/03/2022

Inspection Start/End Times: 1:00 pm – 3:30 pm

Inspection Notice: This inspection was announced.

Scheduled dates asbestos removal¹: 07/05/2022 - 09/09/2022

Scheduled dates demolition/renovation: 07/05/2022 - 09/09/2022

Were samples collected for this inspection? No

Were any sample results positive for asbestos? N/A

2. Introduction

I inspected three adjacent commercial buildings undergoing asbestos abatement in preparation for demolition. The purpose of the inspection was to determine compliance with the Clean Air Act (CAA), National Emission Standards for Hazardous Air Pollutants 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.²

Also participating for on-the-job training were two Alaska Occupational Safety & Health (AK OSH) consultants.

The group of three adjacent commercial buildings have the same owner, Peach Investment Corp.. For the purpose of this inspection the group of buildings was considered a single facility. The buildings are:

Location	Physical description	Size
608 W 4 th Ave.	Four stories, including basement.	20,607 square feet

¹ Current project dates at the time of the inspection. Multiple notices have been submitted to EPA R10 as the abatement work was performed in phases and the demolition activity was postponed.

² See 40 CFR §61.141. *Facility* means any institutional, commercial, public, industrial, or residential structure, installation, or building (including any structure, installation, or building containing condominiums or individual dwelling units operated as a residential cooperative, but excluding residential buildings having four or fewer dwelling units); any ship; and any active or inactive waste disposal site.

Office space, the Reed Building, vacant	Approximately 77 years old	
630 W 4th Ave. The 4 th Avenue Theater, vacant	Five stories including basement and penthouse. Approximately 81 years old	40,304 square feet
646 W 4th Ave. Office space, former First National Bank, vacant	Four stories, including basement. Approximately 70 years old	20,528 square feet



Figure 1: From Left to Right: 608, 630 and 646 W 4th Ave., Anchorage, AK.

Central Environmental Inc. (CEI) is a full-service general construction, demolition, utilities and environmental company.³ For this project, CEI is the asbestos contractor and demolition contractor. CEI submitted a series of asbestos NESHAP notifications to EPA R10 describing asbestos abatement from the three buildings in preparation for demolition. At the time of the inspection, the most recent notification had been submitted on 7/11/22. (See Records Review section below for notification details.) The buildings are currently vacant and have had asbestos abatement in prior years. In calendar year 2022, CEI's records show that the building at 646 W 4th Ave has had asbestos abatement and associated waste disposal, while notices for the other two buildings state that the contractor would continue to search for asbestos containing materials (ACM) and remove it when found.

³ See company web site, <https://cei-alaska.com/aboutus-html/>

Demolition had not begun at the time of the inspection. I confirmed during the on-site inspection that asbestos remained to be abated from a boiler room in one building and from roof penetrations on all three buildings. I identified 10 suspect ACMs during the on-site inspection. Contractor CEI subsequently tested the materials and provided lab test results showing the materials in question were non-detect for asbestos. (See Records Review, below.)

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) database⁴ shows that the property developer Peach Holdings LLC and the contractor CEI have no history of violations or enforcement actions in the last five years.

Environmental Justice Information

A review of EPA's Environmental Justice (EJ) Screening program⁵ shows the project location is rated below the 80th percentile for all indices in the system.

4. Records Review

I reviewed the following records for this asbestos NESHAP compliance inspection.

a. Asbestos Notifications from CEI to EPA R10 (Attachment 2)

Notice Type	Submittal Date	Work Description	Work Schedule
Original Notice Abatement 646 W 4 th Ave only	3/18/22	Notice provided all required details including amounts of asbestos involved in the project and work dates. Thermal System Insulation = 1,000 linear feet Gypsum Wallboard w/ Texture = 9,000 square feet Floor Tile and Mastic = 15,000 square feet	Start: 4/1/22 End: 4/22/22
Revision #1 646 W 4 th Ave only	4/21/22	Revised to reduce amount of estimated asbestos Gypsum Wallboard = 0 Tile and Mastic = 10,500 square feet	Start: 4/1/22 End: 5/6/22

⁴ See <https://echo.epa.gov/>

⁵ See [EJScreen: Environmental Justice Screening and Mapping Tool | US EPA](#)

		Mastic (newly identified) = 4,000 square feet	
Revision #2 646 W 4 th Ave only	5/6/22	Revised to change work dates.	Start: 4/1/22 End: 5/20/22
Revision #3 646 W 4 th Ave only	5/23/22	Revised to change work dates.	Start: 4/1/22 End: 5/31/22
Original Notice Abatement and Demolition 608, 630 and 646 W 4 th Ave	5/16/22	CEI submitted three notices, one for each building, each with the same project work dates. Amount of asbestos to be abated TBD.	Start: 5/31/22 End: 7/15/22
Revision #1 608, 630 and 646 W 4 th Ave	5/27/22		Start: 6/7/22 End: 7/22/22
NOTICE CANCELLED	6/6/22	608 and 630 W 4 th Ave – Effective Immediately 646 W 4 th Ave – Effective 6/14/22	
New Original Notice Abatement and Demolition 608, 630 and 646 W 4 th Ave	6/21/22	Project is back on. New work dates provided in the notices to EPA.	Start: 7/5/22 End: 8/5/22
Revision # 1 608, 630 and 646 W 4 th Ave	7/5/22	Work dates changed.	Start: 7/11/22 End: 8/5/22
Revision # 2 608, 630 and 646 W 4 th Ave	7/11/22	Work dates changed.	Start: 7/25/22 End: 9/9/22

b. Asbestos Survey and Waste Shipment Records (Attachments 3 and 4)

On 8/1/22, I sent an email to CEI requesting records of asbestos sampling and waste disposal from the three buildings. (Attachment 3) The requested records were the following:

1. All asbestos sampling results for samples collected this calendar year (January 1, 2022 – now).
2. If not already included in item #1, provide sampling results for the following suspect asbestos-containing building materials (ACBM) which I observed during the inspection:
 - a. 4th Ave Theater
 - i. Theater curtains (smaller curtains are still hanging above the stage).
 - ii. Drywall/GWB material on theater room walls which was disturbed in order to remove historic murals.
 - iii. Ceiling plaster in the theater room which appeared broken and had fallen in patches from the ceiling.
 - iv. Ceiling tiles in the theater lobby.
 - v. Ceiling tiles in apartment located on 4th floor.
 - vi. Cloth covering - brown, similar to burlap - which covers fiberglass insulation on ductwork.
 - vii. Elevator brakes.
 - b. Reed Building, 608 W 4th Ave.
 - i. Floor tile – 12 x 12 black and white squares – located in bathroom on second floor.
 - ii. Spray-on texture in basement. Observed on pipes and several small wall sections.
 - c. Bank Building, 646 W 4th Ave.
 - i. Air duct insulation – brown with black coating - observed inside sections of ducting in basement closet.
3. All waste disposal records for asbestos waste materials this calendar year (January 1, 2022 – now).

CEI responded on August 11th via email (Attachment 4). CEI provided the following:

Asbestos survey results

- **646 W 4th Ave** (former Bank Building). Samples collected by CEI in April 2021 were analyzed on 4/11/21 and samples collected in May 2022 were analyzed on 5/31/22. Most samples were non-detect for asbestos. The positive asbestos samples were the following:
 - grey paper pipe insulation (40% Chrysotile),
 - black/brown flooring mastic (1.2% Chrysotile),
 - red brick pattern sheet vinyl (2.5 - 20% Chrysotile)
 - tan 9x9 floor tile/mastic (2.6 - 3.8% Chrysotile)
 - white pipe insulation (20% Chrysotile)

- white boiler insulation (15% Chrysotile, 30% Amosite)
 - red floor tile/black mastic (5.1% Chrysotile)
 - grey floor tile/black mastic (2.2% Chrysotile)
- **630 W 4th Ave** (Theater). July 2022 samples were analyzed on 7/18/22. No samples tested positive for asbestos.
 - **EPA-Requested Samples.** Samples requested by EPA immediately after the inspection were submitted by CEI to a lab on 8/5/22 and were analyzed on 8/8/22. No samples tested positive for asbestos.
 - Sample results were not provided for elevator brake shoes in the Theater building. CEI's response stated they would sample brake shoes when they had access during the demolition process.
 - Sample results were not provided for stage curtains in the Theater building as requested.

Waste Disposal Records

Records show that 34 cubic yards of asbestos-containing waste material (consisting of 793 bags, totaling 18,975 pounds) were removed from the 646 W 4th Ave Anchorage building and transported by CEI to an interim storage area on 6/28/22, and from there brought to the Anchorage Regional Landfill on 7/14/22. The landfill signed the Waste Shipment Record form and identified no discrepancies with the shipment.

5. Inspection Elements/Order

Pre-Inspection Observations

This was an announced inspection. I arranged to meet contractor CEI and have them escort me through the group of three buildings. Abatement work had been intermittent in the weeks leading up to the inspection and I wanted to ensure that someone was there to unlock the doors and show me the work they had done to remove asbestos to date. I arrived at 1:00 p.m. and observed the properties from across the street. I walked over to the 4th Avenue Theater and met CEI representatives Stewart Jacques, Mike Montanye, Caleb Moffitt and Angela Swigart. Also present for the inspection were AK OSH representatives Gina Agron and Brad Buechner.

Entry and Opening Conference with Facility Representatives

I introduced myself to the CEI representatives and showed them my inspector credentials. I said I was there to check on compliance with the asbestos NESHAP at their job site. I pulled out a copy of the most recent asbestos renovation notifications EPA received from CEI for the project (Attachment 2). The notifications stated the amount of asbestos to be removed was "TBD" and the schedule would run through 9/9/22, approximately six more weeks.

I asked to walk from top to bottom of each building to look for any remaining asbestos materials which may need to be removed before demolition. I said that if I collected samples they could of course collect split samples at the same time so we both have the same information.

Facility Walk-Through

I toured the three buildings with the CEI representatives, starting at 1:15 pm. No demolition or asbestos abatement was taking place that day. I took photos as we walked along, see photo log (Attachment 1). Many areas were dark and we relied on flashlights and ambient light from windows to see in most areas. When I saw suspect asbestos materials I pointed them out and made notes to follow up and request test results. CEI representatives said they were still in the process of removing “Other Regulated Material” (ORM) such as fluorescent light ballasts that may contain PCBs, mercury in light switches and thermostats and miscellaneous chemicals.

630 W 4th Ave. – The 4th Avenue Theater

We started with the Theater Building on the ground floor. The utilities were scheduled to be shut off the next week and some lighting was on. However, the large theater room was dark and cavernous and had significant damage in areas. Theater seats were already removed. Loose boards were piled up. A mural painted on a wall was physically removed (for historic preservation) and white, dusty powder lay on the floor beneath where it used to be. Portions of the ceiling plaster had fallen some thirty feet to the floor below. Large golden columns extended from floor to ceiling and were showing cracks and chips in the surface and revealed plaster underneath. Theater curtains were hung above the stage. The CEI representatives said they thought the curtains dated from the 1980s. Theater curtains are a known historic use of asbestos.

The theater lobby had square, white ceiling tiles. CEI representatives said pipes with thermal system insulation (TSI) had already been abated in 2018, which explained why we were seeing holes in walls in the lobby and other locations in the building such as bathrooms. We examined an electric panel adjacent to the lobby and I confirmed the wiring was not asbestos-coated.

We walked up to the penthouse apartment on the 4th Floor. Appliances yellow-green appliances were still in place. Holes were cut into walls and the bare pipes were exposed in the wall cavities. CEI representatives said the vinyl floor tiles had already been tested and did not have asbestos. I looked at the floor tiles and they were flexible not brittle or friable. There was a wood ceiling above the drop ceiling. In the utility room, a carpet lay on top of the plywood floor. In the office space I saw no suspect asbestos materials. Exit Signs were installed at the ceiling. CEI representatives said they had found that some contain radioactive material which is not unusual for older Exit Signs. We had a view of the roof and I asked if they had found asbestos materials there. The CEI representatives said the roof itself is negative for asbestos, however the roof flashings are hot, with 1-3% asbestos in their samples.

We walked down the stairs to “Level 3.5” which had access to the attic. I looked inside the attic and saw the pipes were bare metal. On some ductwork surfaces I saw an insulation material that was cloth wrapping. I said I would be asking for their test results for that.

We walked down to the 3rd Floor. I asked if the elevator brakes had been tested for asbestos.

CEI representatives said it had not been tested. I said I would be asking for their test results before the demolition could go forward. We also examined an office space and the hallway. The CEI representatives said that cement asbestos board (CAB) had already been removed from the hallway. I saw more of the brown cloth material inside the open walls and said I would need to see asbestos test results for that.

We went next to the 2nd Floor. Here I examined a safe vault. Inside the vault I saw no suspect ACM. The walls were bare concrete. I found no spray-on fireproofing here. The ceilings were exposed: the pipes at the ceiling were bare. CEI representatives said the pipes had previously been abated.

We continued to the Basement Floor. The Boiler Room was marked with Asbestos Warning tape. CEI representatives said they would be removing TSI from pipes there. We also examined fire doors which were being stored in the basement and were labeled with asbestos warning tape. CEI had identified six fire doors so far, they said. A kitchen area in the basement used to be used for events at the theater. I looked over the kitchen and it was newer, with no suspect ACM.

608 W 4th – Ave. The Reed Building

We entered the Reed Building at approximately 2:38 pm. We climbed the stairs to the 3rd Floor and continued our tour. This level had a wood ceiling with wood trusses and a wood floor. Metal support posts ran from the floor to ceiling. The ductwork was bare, clean metal. The walls were covered in sheetrock that looked new and had no joint compound. CEI representatives said the building had been abated in 2018.

We walked the length of the floor and stepped into a bathroom and small spaces off the hallway. The bathroom had 12x12, square, black-and-white floor tile. Wallpaper varied in the small rooms along the hallway included zebra, flowers and striped patterns.

On the 2nd Floor I examined a pipe chase in a wall opening and saw it was bare, uninsulated metal. In a bathroom we again saw black-and-white floor tiles. CEI representatives said it had tested negative for asbestos. I requested test results for them.

On the 1st Floor I saw a gas furnace that was not insulated, therefore not suspect for ACM. We continued down to the basement which was empty. Water pipes suspended from the ceiling were painted white. Some sections of pipe had plaster “over-spray” dotting the surface, and I asked for asbestos test results of the spray material.

646 W 4th Ave. – Former First National Bank

We entered the former First National Bank Building at approximately 3:00 pm. This building had asbestos abatement this spring and summer. On the 1st Floor, I saw that the ceiling had cut-out sections which revealed pipes up above. The pipe elbows had been abated and the straight sections were still insulated with fiberglass. The floor decking above the ceiling was bare corrugated metal (not sprayed with fireproofing). We also walked into the safety deposit box room. Several dozen of the boxes were open. I found no suspect ACM in this room. We walked

the perimeter of the lobby, stepped behind the service counter and looked at walls and the floor. The floor had already been abated. No suspect ACM was found in these areas.

We walked downstairs to the basement. In a storage closet I saw ductwork that was coated on the inside with a sound dampening fiberglass material that was black on one surface. I asked for asbestos test results for the black material. We looked at the boiler room. A “Redflash” boiler there had already been abated. The boiler surface was corroded and rough, and in some spots a white mineral deposit was visible. I examined the white mineral and determined it was not suspect asbestos.

Sampling

I did not collect samples for this inspection. Asbestos sampling results were provided by CEI and are included as Attachment 4 to this report.

Closing Conference

At about 3:20 pm I had a closing conference in the lobby of the former First National Bank Building with CEI representatives.

I asked them about their plan to demolish the three buildings. I ask how they will prevent dust during the demolition. CEI representatives said they would have water on site and spray during demolition to prevent dust. They said public access would be blocked by having traffic controls in the street and the 4th Avenue sidewalk would be closed (on the buildings side).

I said I had only seen the roof of the 4th Ave Theater but not the roofs of the other two buildings. I asked if those roofs also had asbestos. CEI representatives said the roofs are the same: they found asbestos in the roof penetrations and would abate those areas.

Mr. Jacques said their schedule was to begin demolition in about two weeks, but they had just learned of a delay. He said they were asked to put bracing in the basements to reinforce the structures before demolition. He said that was to prevent the basements from being wrecked and putting in the bracing would take time.

I said that when the schedule changes they will need to revise their notices. I said they will also need to revise the notices to indicate the amounts of asbestos to be abated. As submitted, the notices state the amounts of asbestos are TBD.

I said I would request records, including their asbestos surveys. I said I would send that via email on the coming Monday and asked them to provide the records within two weeks. (I sent an email to CEI on 8/1/22 requesting records. See Attachment 3.)

I asked the CEI representatives if they had any questions for me. They did not. I left the facility at about 3:30 pm.