

# Asbestos Containing Building Material Survey

# Former Hickey & Sons Property Metal Structure at 3702 E. Hampton Street (Bldg. #5) Tucson, AZ

# Report Date: October 5, 2018

# SHC-T18651

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### INSPECTION INFORMATION SHEET

Southwest Hazard Control, Inc.
1953 West Grant Road
Tucson, Arizona 85745
Pima County Department of Environmental Quality
33 N. Stone Avenue #700
Tucson, AZ 85701
3702 E. Hampton Street (bldg. #5)
September 25, 2018
EMSL Analytical, Inc.
EMSL Analytical, Inc. 200 Route 130 North Cinnaminson
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### 2.0 INSPECTION REPORT

### 2.1 Introduction

Southwest Hazard Control, Inc. ("hereafter known as SHC") was contacted by Kimberly Baeza of the Pima County Department of Environmental Quality, to have SHC visit the subject site and collect bulk samples of readily available suspect building materials that may be disturbed during possible demolition activities. Sampling was to be collected of building materials with analysis performed by an independent 3<sup>rd</sup> party laboratory.

Stan Maxam of SHC conducted the site reconnaissance and subsequent sampling on September 25, 2018. Mr. Maxam is an employee of SHC and is an EPA AHERA Accredited Licensed Asbestos Building Inspector, experienced in performing asbestos surveys.

### The following summaries apply:

### ACM Identified by Testing

3702 E. Hampton Street - (bldg. 5) No asbestos materials are present in the structure.

### Note:

Various regulatory agencies have jurisdiction over projects dealing with the assessment PACAM (Presumed Asbestos Containing Materials) and abatement of ACBMs (Asbestos Containing Building Materials). The EPA regulates building materials that contain greater than 1 percent asbestos. Pima County enforces the EPA NESHAP rule with respect to releases of asbestos to the environment. OSHA regulates asbestos removal projects as they relate to worker safety and exposure issues (Airborne asbestos fibers must be below the OSHA standard of 0.10 fibers per cubic centimeter.

**\*\*** OSHA does not recognize composite sampling protocol (<1%) as related to worker safety and requires proper removal techniques and training.

Category I & II-ACM's (<u>Asbestos Containing Materials</u>) should be removed prior to demolition. Normal demolition/renovation activities involve heavy equipment and crushing of building materials, this could render these ACM's friable and all related building materials. All these materials would then need to be handled and disposed of as Regulated ACM's and possibly causing a violation of the NESAP affecting the Owner & Operator.

A written notification must be provided to the PCDEQ NESHAP coordinator at least 10 working days prior to asbestos abatement projects involving the removal of greater than 160 square feet of a surfacing material, 260 linear feet of pipe length or one cubic yard of regulated asbestos material.

- Prior to demolition or renovation a copy of the survey should be included with application for permit to Pima County Department of Environmental Quality, County, and City Permit departments.
- A copy should also be made available to the contractor selected to do demolition or renovation and kept on site at all times.
- The owner should retain a licensed and qualified asbestos abatement contractor to perform abatement activities. The general contractor, if one is retained for renovation or demolition, may be the best source for local, licensed abatement contractors.
- Before the abatement of asbestos containing materials from the facility, the abatement contractor or the general contractor should provide the 10 working day notification using forms supplied by PCDEQ, EPA Region 9, or the State of Arizona. The notification should include information relating to the abatement work and at the demolition/renovation work.

The owner should ensure that the general contractor and/or abatement contractor provide notice to any people who may be in the area during abatement work (building occupants, other subcontractors, etc.) of the asbestos abatement work.

This document is prepared by SHC and is designated for the sole use of the Owner and/or any regulatory agency that may be directly involved with this property. No other party should rely on the information contained herein without prior written consent of SHC, Inc. This report shall not be reproduced except in full, without the written consent of the Owner.

### 2.2 Scope of Services

According to the information provided to SHC the buildings on the property may be demolished in the near future. Applicable asbestos regulations require that the buildings or the portions affected by demolition or renovation be thoroughly inspected for asbestos prior to such activities by an AHERA accredited inspector. The purpose and scope of our services was to inspect, identify, and assess suspected asbestos-containing materials that are, or may, at some point become subject to site demolition. SHC was contacted for the purpose of identifying all readily available and assessable suspect asbestos containing building materials prior to the work scheduled at this site.

### 2.3 Site Information

This is a former metal storage unit.

### 2.4 Survey Methodology

This asbestos compliance survey was accomplished by visually inspecting the subject areas as directed and identifying suspect ACM's within the areas to be disturbed during the possible demolition. A comprehensive visual inspection of the area was performed to acquaint the inspector(s) with an overview of the site. Random samples were taken from interiors and exteriors of the structures. Sampling locations were listed with description given for each sample along with location numbered and sampling location. All interior and exterior areas were visited. Destructive sampling was performed. If questionable items are encountered and revealed, stop work and contact SHC (520-622-3607) for further testing and evaluation.

Random representative samples of homogeneous materials were taken using variations of a random sample pattern. When random sampling could not be conducted, convenient sampling was performed. Samples taken were given individual numbers, prefixed with an area number and recorded on collection sheets and laboratory chain of custody sheets.

The suspect materials identified during our site visit were classified for the type of building material under the following categories:

### Surfacing Material:

Material that is sprayed-on, trawled on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other surface materials used for acoustical, fireproofing or other purposes.

### Miscellaneous Material:

Internal building material on structural components, structural members, or fixtures such as floor and ceiling tiles.

### 2.5 Description of Sampling and Testing

Sampling was performed on all assessable and readily available suspected asbestoscontaining materials (ACM) identified as materials that may be disturbed during possible demolition. Sample analysis was performed to determine the presence, if any, of asbestos content in the friable materials. Destructive sampling was performed. Sampling was performed in accordance with all State, Federal and Local governmental agency policies, procedures and regulations. Desert Analytical participates in the AIHA/NIOSH and (PAT) Programs and AIHA Bulk Sample Round Robin Program.

### 2.6 Sample Summary

During our site inspection of this site at the request of our client, a total of 2 samples were obtained, with 2 individual layers from 1 homogenous area. Representative samples were collected and submitted for laboratory analysis.

### 2.7 Analysis of Bulk Samples

Asbestos bulk analysis was performed on all of the samples by EMSL Analytical, Inc. with Polarized Light Microscopy (PLM) is the EPA approved method for analyzing bulk materials for asbestos. PLM utilizes a light microscope equipped with polarizing filters.

The identification of asbestos fiber bundles is determined by visual properties displayed when the sample is treated with various dispersion staining liquids. The actual structure of the fiber and the effect of polarized light on the fiber, all of which is viewed by a trained technician, substantiate identification. The limit of detection of asbestos is about one percent (1%) by area.

Attachments:

Tables Laboratory Data Sample Location Descriptions

Table 1 – Description of suspected homogeneous ACBM sampled

Area #	Description
1	Concrete slab

### Table 2 -- List of Suspect ACM Homogeneous Areas Sampled/Assumed

Sample Number	HA #		Description / Location		Asbestos	Friable
3702-1	1	Concrete slab	East end	G	N	N
3702-2	1	Concrete slab	Northwest corner	G	N	N

### Samples shaded and bolded are asbestos containing.

OrderID: 041829109

EMOL ANALYTICAL INC.

Asbestos	Chain	of Custody
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Sample #		San	nple Descriptio	on				Volume HA /	Area (Air) # (Bulk)	Date/Time Sampled	
3702-1	Concrete	slab	Eas	st en	d				<b>I</b>	9/25/18	
3702-2	Concrete	slab	No	rthw	est co	rner			4		
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EMSL	EMSL Analytical, Inc. 200 Route 130 North Cinnaminson, NJ 08077 Tel/Fax: (800) 220-3675 / (856) 786-5974 http://www.EMSL.com / cinnasblab@EMSL.com	EMSL Order: Customer ID: Customer PO: Project ID:	041829109 SOUT56
Attention:	Stan Maxam	Phone:	(520) 622-3607
	Southwest Hazard Control, Inc.	Fax:	(520) 622-3643
	1953 West Grant Road	Received Date:	09/26/2018 9:30 AM
	Tucson, AZ 85745	Analysis Date:	09/26/2018
		Collected Date:	09/25/2018
Project:	T18651		

### Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Ashestos			
Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Туро	
3702-1	East End - Concrete Slab	Tan Non-Fibrous		100% Non-fibrous (Other)	None Detected	
041829109-0001		Homogeneous				
3702-2	Northwest Corner - Concrete Slab	Gray Non-Fibrous		100% Non-fibrous (Other)	None Detected	
041829109-0062		Homogeneous				

Analyst(s)

Natalia Dispensa (2)

Benjamin Ellis, Laboratory Manager or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report nust not be used by the client to claim product certification, approval, or endorsement by NVLAP. NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc, Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

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# **Certificate of Achievement** Asbestos Building Inspector – Refresher

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This is to certify that the following individual has passed a competency exam meeting the requisite training for Asbestos Accreditation under TSCA Title II ETC Compliance Solutions is accredited by the State of Texas License No. 00-0076

# Stanley P. Maxam

XXX-XX-8070



Training Date: December 19, 2017 Expiration Date: December 19, 2018 Certificate #: **08820342** Issue / Exam Date: December 19, 2017



Instructor: Brian Gladhart

Training Director: Carole Benz



# ATTACHMENT 3

### Hickey & Sons Parcel Phase I Environmental Site Assessment Report, August 9, 2018 Observations, Database Information and Recommendations

Engineering and Environmental Consultants was contracted by Pima County to perform an expanded Phase I Environmental Site Assessment for one parcel (herein referred to as "the property"). The Pima County Assessor's Parcel Number associated with the property is 112-16-171A. The property consists of approximately 1.11 acres located in Section 4, Township 14 South, Range 14 East Gila and Salt River Baseline and Meridian, Pima County, Arizona.

## The assessment revealed the following Recognized Environmental Conditions (RECs) in connection with the property.

REC 1 – petroleum stained soil along the south side of the large Quonset building located on the southwest portion of the property. Petroleum stained soil should be removed, properly disposed and confirmation sampling conducted.

REC 2 – former lube pit within the large Quonset building located near the southwest corner of the property; it is considered a REC due to its unknown construction and likelihood of receiving petroleum discharges from historical auto repair activities. An assessment should be performed to determine if the soil beneath the lube pit has been impacted. After assessment the lube pit should be removed or filled in should no use for it be identified.

REC 3 – drainage sump within the former covered auto repair area associated with the Quonset building on the south central portion of the property. It is considered a REC due to its unknown construction and likelihood of receiving discharges from historical auto repair activities. An assessment to determine if soils beneath the sump are impacted should be conducted; then the sump should be removed.

REC 4 - two five-gallon containers with unknown contents on the east-central boundary of the property. The containers are in poor condition and should be removed and properly disposed.

REC 5 – three stored transformers on the east-central boundary of the property, which have no labeling identifying them as free of polychlorinated biphenyls (PCBs). Removal and proper disposal of these transformer is recommended; as well as assessing whether the soils beneath them is contaminated with PCBs.

## The assessment revealed the following Historical Recognized Environmental Condition (HREC) in connection with the subject property.

HREC – the property had five underground storage tanks (USTs) that were removed in 2001; however, no further action is recommended.

### **Observations and Recommendations**

• The property has an unused aboveground storage tank (AST) with an oily water mixture,

and both should be removed and properly disposed.

- The access to the lube pit is not secure and presents a safety hazard. Access to the lube pit should be limited and a secure access cover installed.
- Solid waste and stored materials are found throughout the property; proper removal and disposal is recommended.
- Various stored containers are found in the interior and exterior of structures on the property; recycling or proper disposal of these materials is recommended.
- Suspect asbestos containing building material (ACBM) is present on the structures; an asbestos survey and abatement (if needed) should be conducted prior to demolition activities.
- Various building components of the structures have suspect lead-based paint. Lead-based paint testing may be required by the receiving landfill if the structures are demolished.
- It is possible that some portions of the property were serviced by a septic system in the past. Assuming only domestic waste was introduced into the septic system, no long-term environmental impact to the property would be expected. However, septic systems can be physical hazards during construction/demolition activities.

# ATTACHMENT 4



