NESHAP Asbestos Inspection Report

Client:

Ms. Nancy Bewley

Project Location:

Historic Home
2516 Willow Creek Road
Prescott, Arizona 86301

JRM Job: 21-1168

Inspection Date: September 7, 2021

Report Date: September 14, 2021

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Limited NESHAP Asbestos Inspection Report

Sent Via Email: nancywbewley@gmail.com

Ms. Nancy Bewley

RE: Historic Home
2516 Willow Creek Road
Prescott, Arizona 86301

JRM Lab: B21-808
JRM Job: 21-1168

Dear Ms. Bewley,

Please find herein the sampling results and final project documentation for the above referenced site.

Site Reconnaissance and Inspector Information

Mr. Jason Marshall inspected the subject site for asbestos pursuant to our scope of work on September 7, 2021. Mr. Marshall is a certified Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA) asbestos building inspector.

Authorization to Proceed and Scope of Work

The sampling, testing, and subsequent material analysis were conducted pursuant to a verbal authorization given to JRM Environmental, Inc. (JRM) by Nancy Bewley. Our scope of work included the identification of the suspect materials for the planned renovations.

JRM's General Policy

It is the general operating policy of JRM to recommend removal/abatement of all ACM prior to any disturbance. Trained and licensed asbestos abatement professionals must always perform removal activities pursuant to applicable regulations. We recommend that only experienced, state approved abatement contractors be utilized for abatement activities.

Inventory of Materials Tested

Sample ID	*Homogeneous Material*	*Location*	*NESHAP Category*	*Positive or Negative*	*Amount*
1-3	**Tan Linoleum**	**Future ADA Restroom**	**RACM**	**Positive**	**120 SF**
4-6	Gray Linoleum	Future ADA Restroom	NA	Negative	None
7-9	Drywall	Kitchen, Future ADA Restroom, Men's and Women's Restrooms	NA	Negative* ≤1% Chrysotile	None
10-12	Red 5" Ceramic Tile and Grout	Kitchen	NA	Negative	None
13-15	Black 4" BBA	Kitchen	NA	Negative	None
16-18	**Green Linoleum**	**Men's Restroom**	**RACM**	**Positive**	**40 SF**
19-21	**Tan Linoleum**	**Women's Restroom**	**RACM**	**Positive**	**56 SF**
22-24	Fiberboard	Men's and Women's Restroom Walls	NA	Negative	None
25-27	Plaster	Men's and Women's Restroom Walls	NA	Negative	None

***Material Containing ≤1% Chrysotile**

Under the OSHA Construction Standard, "less than or equal to one percent" is still regulated. The employer (contractor) who disturbs this asbestos material must:

(1) Use wet methods.
(2) Promptly contain any waste in leak-tight containers.
(3) Conduct air monitoring or have a negative exposure assessment.

It is not any class of work since it is not ACM. The waste stream is not regulated for transportation or disposal.

Laboratory Analysis Summary

During our site investigation of the property, and at the request of our client, a total of 27 bulk samples were collected and analyzed for asbestos content. The samples were analyzed by JRM's in-house laboratory pursuant to Polarized Light Microscopy (PLM) EPA, Method 600/R-93/116 and M600/M4-82-020. The National Voluntary Laboratory Accreditation Program (NVLAP) administers JRM's laboratory proficiency. JRM's NVLAP code is 200080-0.

Description of the Method Used for Sampling

When possible, friable bulk material samples were collected from a statistically random manner that is representative of the homogeneous area. Non-friable material samples were also collected randomly but may have been collected conveniently depending on the location of the sample/material. Glass, metal, and wood were excluded from bulk sampling. A certified building inspector conducted the sampling of this site in accordance with applicable regulations.

NESHAP's Notification Information

AHERA Inspector:	Jason Marshall	AHERA Number:	4644-3652-041421
		Expiration Date:	4-14-2022
		Training Provider:	The Asbestos Institute
Dates of Inspection:	September 7, 2021	Amount of RACM:	216 SF
NESHAP's Notification Required for ACM?	Yes	Amount of Category I: Amount of Category II:	None None
Name of Laboratory:	JRM	Method of Analysis:	M600/M4-82-020 600/R-93/116
Number of Samples:	27	Dates Analyzed:	September 10, 2021

Yavapai County Air Quality Department Regulations

The Arizona Department Of Environmental Quality (ADEQ) regulates all asbestos renovation and demolition within Yavapai County.

Should areas within the subject site become scheduled for demolition activities involving taking out a load-supporting structural member, or if regulated (friable) amounts of asbestos are to be abated from this site greater than or equal to 160 square feet, 260 linear feet, or 35 cubic feet, you must prepare and submit the 10-Day NESHAP notification form with the notification fee. The notification must be postmarked or hand-delivered to ADEQ Air Quality Compliance Section, Field Services Unit, Attn: Asbestos NESHAP Program, 1110 W. Washington Street, Phoenix, Arizona, 85007 at least ten [10] working days prior to the commencement of the demolition activity.

Notification forms can be downloaded from their web site at www.azdeq.gov

Report Abbreviations and Definitions

The following definitions and/or abbreviations may be present and used in this report:

Abbreviation	Meaning
NA:	Non Asbestos / Not Applicable
Cat I (Category I):	Non-friable asbestos-containing material including packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos.
Cat II (Category II):	Any material, excluding Category I, non-friable ACM, containing more than 1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
Class I:	Removal of surfacing and TSI ACM.
Class II:	The removal of all other ACM.
Class III:	Maintenance activities that disturb ACM.
Class IV:	Maintenance activities that come into contact with, but does not disturb ACM.
Misc.:	Interior building materials located on structural components, structural members or fixtures, such as floor and ceiling tiles. Miscellaneous material does not include surfacing material or thermal system insulation.
RACM:	Friable asbestos material, Category 1 non-friable ACM that has become friable, Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.
Surf.:	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.
TSI:	Thermal System Insulation such as pipe insulation and fittings.

Location

AFS:	Above Floor Surface	SEC:	Southeast Corner
C:	Center	SWC:	Southwest Corner
NEC:	Northeast Corner	NWC:	Northwest Corner

Quantity

SF:	Square Feet/Footage
LF	Linear Feet/Lineal Feet/Footage

Other

A:	Assumed
AHERA:	Asbestos Hazard Emergency Response Act
BBA:	Base Board Adhesive
EPA:	Environmental Protection Agency
FT:	Floor Tile
JRM:	JRM Environmental, Inc.
LEA:	Local Education Agency
VAT:	Vinyl Asbestos Tile
VCT:	Vinyl Tile
T:	Tested

Asbestos:

The asbestiform varieties of: Chrysotile; crocidolite; amosite; anthophyllite; tremolite; and actinolite.

Asbestos-Containing Material (ACM):

Any material or product that contains more than 1 percent asbestos.

Asbestos-Containing Building Material (ACBM):

ACBM means surfacing ACM, thermal systems insulation, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.

Friable:

Friable when referring to material in a building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously non-friable material after such material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

Functional Space:

A room, group of rooms, or homogeneous area, such as crawl spaces, bedroom, a kitchen, gymnasium, hallways, etc., designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

Homogeneous Area:

An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

Miscellaneous Materials:

Interior building material on structural components, structural members or fixtures, such as floor tile and ceiling tiles, and does not include surfacing material or TSI.

Non-Friable:

Non-friable means material in a building which when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

Surfacing Materials:

Material that is sprayed, trawled-on, or otherwise applied to surfaces.

Thermal System Insulation:

ACM applied to pipes, fittings, boilers, breaching, tanks, ducts, or other structural components to prevent heat loss or gain.

BULK ASBESTOS ANALYSIS SUMMARY REPORT

CLIENT: Nancy Bewley **ATTENTION:** Nancy Bewley

LABORATORY NUMBER: B21-808 **PROJECT:** 2516 Willow Creek Road

JRM LAB SAMPLE ID	SAMPLE DESCRIPTION	TEST RESULTS POSITIVE/NEGATIVE & TYPE		OTHER MATERIALS
B21-808-1	Tan Linoleum	**Positive**	**Layer 2 Back 45% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 45% Chrysotile 55% Non-Fibrous
B21-808-2	Tan Linoleum	**Positive**	**Layer 2 Back 45% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 45% Chrysotile 55% Non-Fibrous
B21-808-3	Tan Linoleum	**Positive**	**Layer 2 Back 45% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 45% Chrysotile 55% Non-Fibrous
B21-808-4	Gray Linoleum	Negative	None	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Cellulose 1% Fibrous Glass 39% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-5	Gray Linoleum	Negative	None	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Cellulose 1% Fibrous Glass 39% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-6	Gray Linoleum	Negative	None	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Cellulose 1% Fibrous Glass 39% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous

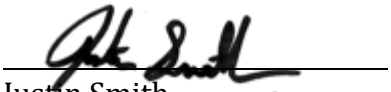
JRM LAB SAMPLE ID	SAMPLE DESCRIPTION	TEST RESULTS POSITIVE/NEGATIVE & TYPE		OTHER MATERIALS
B21-808-7	Drywall	Negative	Layer 2 Comp ≤1% Chrysotile 1 Point = 0.25%	Layer 1 Paint 100% Non-Fibrous Layer 2 Comp ≤1% Chrysotile 99% Non-Fibrous Layer 3 Paper 90% Cellulose 10% Non-Fibrous Layer 4 Gypsum 2% Cellulose 98% Non-Fibrous
B21-808-8	Drywall	Negative	Layer 2 Comp ≤1% Chrysotile 0 Points = Trace Layer 4 Comp ≤1% Chrysotile 0 Points = Trace	Layer 1 Paint 100% Non-Fibrous Layer 2 Comp ≤1% Chrysotile 99% Non-Fibrous Layer 3 Tape 90% Cellulose 10% Non-Fibrous Layer 4 Comp ≤1% Chrysotile 99% Non-Fibrous Layer 5 Paper 90% Cellulose 10% Non-Fibrous Layer 4 Gypsum 2% Cellulose 98% Non-Fibrous
B21-808-9	Drywall	Negative	Layer 2 Comp ≤1% Chrysotile 0 Points = Trace Layer 4 Comp ≤1% Chrysotile 0 Points = Trace	Layer 1 Paint 100% Non-Fibrous Layer 2 Comp ≤1% Chrysotile 99% Non-Fibrous Layer 3 Tape 90% Cellulose 10% Non-Fibrous Layer 4 Comp ≤1% Chrysotile 99% Non-Fibrous Layer 5 Paper 90% Cellulose 10% Non-Fibrous Layer 4 Gypsum 2% Cellulose 98% Non-Fibrous
B21-808-10	Red 5” Ceramic Tile and Grout	Negative	None	Layer 1 Ceramic 100% Non-Fibrous Layer 2 Grout 100% Non-Fibrous

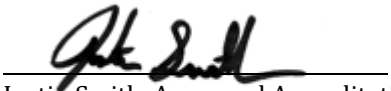
JRM LAB SAMPLE ID	SAMPLE DESCRIPTION	TEST RESULTS POSITIVE/NEGATIVE & TYPE		OTHER MATERIALS
B21-808-11	Red 5" Ceramic Tile and Grout	Negative	None	Layer 1 Ceramic 100% Non-Fibrous Layer 2 Grout 100% Non-Fibrous Layer 3 Glue 100% Non-Fibrous
B21-808-12	Red 5" Ceramic Tile and Grout	Negative	None	Layer 1 Ceramic 100% Non-Fibrous Layer 2 Glue 100% Non-Fibrous
B21-808-13	Black 4" BBA	Negative	None	Layer 1 Baseboard 100% Non-Fibrous Layer 2 Adhesive 100% Non-Fibrous
B21-808-14	Black 4" BBA	Negative	None	Layer 1 Baseboard 100% Non-Fibrous Layer 2 Adhesive 100% Non-Fibrous
B21-808-15	Black 4" BBA	Negative	None	Layer 1 Baseboard 100% Non-Fibrous Layer 2 Adhesive 100% Non-Fibrous
B21-808-16	Green Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-17	Green Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-18	Green Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-19	Tan Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous

JRM LAB SAMPLE ID	SAMPLE DESCRIPTION	TEST RESULTS POSITIVE/NEGATIVE & TYPE		OTHER MATERIALS
B21-808-20	Tan Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-21	Tan Linoleum	**Positive**	**Layer 2 Back 60% Chrysotile**	Layer 1 Top 100% Non-Fibrous Layer 2 Back 60% Chrysotile 40% Non-Fibrous Layer 3 Mastic 1% Cellulose 99% Non-Fibrous
B21-808-22	Fiberboard	Negative	None	Layer 1 Wallpaper 60% Cellulose 40% Non-Fibrous Layer 2 Glue 1% Cellulose 99% Non-Fibrous Layer 3 Panel 90% Cellulose 10% Non-Fibrous
B21-808-23	Fiberboard	Negative	None	Layer 1 Wallpaper 60% Cellulose 40% Non-Fibrous Layer 2 Glue 1% Cellulose 99% Non-Fibrous Layer 3 Panel 90% Cellulose 10% Non-Fibrous
B21-808-24	Fiberboard	Negative	None	Layer 1 Wallpaper 60% Cellulose 40% Non-Fibrous Layer 2 Glue 1% Cellulose 99% Non-Fibrous Layer 3 Panel 90% Cellulose 10% Non-Fibrous
B21-808-25	Plaster	Negative	None	1% Cellulose 99% Non-Fibrous
B21-808-26	Plaster	Negative	None	1% Cellulose 99% Non-Fibrous
B21-808-27	Plaster	Negative	None	1% Cellulose 99% Non-Fibrous

Method: Polarized Light Microscopy, EPA Method 600/R-93/116 and M600/M4-82-020

The result quantifications reported are an estimation based on the methods of visual microscopic estimation, which is considered only a semi-quantitative technique. Also, this report is indicative only of the sample material JRM received. Results do not necessarily reflect the makeup of the entire span of the material from which the samples were derived. Sampling techniques and/or sample handling may affect the integrity of the sample(s) before submission to JRM and hence the outcome of the laboratory results. Samples not destroyed by testing are retained a minimum of thirty days. The client cannot use this report to claim product endorsement by NVLAP or any agency of the U.S. Government.

Analyst:  Date analyzed: 9/10/21
Justin Smith

Reviewed by:  Date reviewed: 9/10/21
Justin Smith, Approved Accreditation Signatory

Limitations

Samples containing less that 10% asbestos should be reanalyzed utilizing the point count method (400 points). Such point counting is required by NESHAP unless the building owner agrees that the material is asbestos. Each point count is an additional charge.

Other non-ACM materials found in the sample(s) matrix are listed on the lab bench sheets stored in the JRM laboratory files. Sample QA/QC documented in QA/QC log also stored in the laboratory. Some samples (% based) are sent to third-party laboratories for additional quality control checks. Samples not destroyed in testing/analysis are stored/retained a minimum of 30 days.

The result quantification reported are estimates based on the methods of visual microscopic estimation, which is considered only a semi-quantitative technique. Also, this report is indicative only of the sample material JRM received.

Results do not necessarily reflect the makeup of the entire span of the material from which the samples were derived. Sampling techniques and/or sample handling may affect the integrity of the samples before submission to JRM and hence the outcome of the laboratory results.

Material quantifications, maps and/or locations are not part of our scope of work. Subsequently, such items are not included or identified in this limited report. If applicable, verify all material quantities and locations prior to disturbance and document each properly.

Should any previously unidentified materials, materials inaccessible at the time of our inspection, or materials requiring additional sampling become exposed as a result of construction, demolition/renovation, or remodeling, those materials, if any, must be sampled and tested for asbestos by an AHERA accredited building inspector prior to disturbance.

This report is not a comprehensive study; it represents a limited compliance inspection for the materials listed herein. Only materials identified in the sample summary were sampled and tested for asbestos content. JRM cannot warrant or guarantee the building does not contain ACBM or ACM in other areas of the building(s).

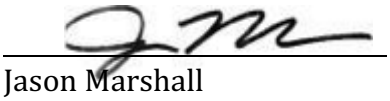
The aforementioned inspection was conducted in a non-aggressive manner. Unless specified, no destructive means were used to gain access to inaccessible spaces such as duct chases, wall interiors, above sold ceilings, etc. Due to this fact, during any renovation for demolition, personnel should always be aware and alert for any ACM suspected materials that might be hidden. With this in mind, materials such as duct tape or pipe insulation may be located in inaccessible areas.

There is no guarantee that all asbestos containing building materials have been locate and properly identified in the sampling area. The possibility does exist that the material composition of the samples collected may differ depending upon the location from which the samples were taken. This is true in some cases, for samples collected from the sample area (i.e. patch materials).

Project Signature

This concludes our work under this phase of the project. Should you have any questions concerning this report, please contact me at your convenience.

JRM Environmental, Inc.



Jason Marshall
EPA Building Inspector 4644-3652-041421
Expires April 14, 2022

Attachment 1: Building Inspector Certification

THE ASBESTOS INSTITUTE

Certifies that

Jason Marshall

has attended and received instruction in the EPA approved course

AHERA Building Inspector Refresher

on

April 14, 2021

and successfully completed and passed the competency exam.

Certificate:
ON-4644-3652-041421

Date of Examination:
14-Apr-2021

Date of Expiration:
14-Apr-2022

William T. Cavness
Director

Approved Instructor

THE ASBESTOS INSTITUTE
20033 N. 19th Ave, Building 6, Phoenix, AZ 85027
602-864-6564 – www.theasbestosinstitute.com

This training meets all requirements for asbestos certification under Toxic Substance Control Act Title II.

Attachment 2: Laboratory Accreditation

United States Department of Commerce
National Institute of Standards and Technology

NVLAP®

ilac-MRA

Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200080-0

JRM Environmental, Inc.
Scottsdale, AZ

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Asbestos Fiber Analysis

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2020-10-01 through 2021-09-30
Effective Dates

DEPARTMENT OF COMMERCE · UNITED STATES OF AMERICA

For the National Voluntary Laboratory Accreditation Program