



THE L&R GROUP

680 South Progress Avenue, Suite 2A
Meridian, Idaho 83642
208-813-7700

NESHAP Asbestos Inspection

Residence Building
St. Anthony Juvenile Corrections Center

Prepared For:
Idaho Division of Public Works
502 North 4th Street
Boise, Idaho, 83702

L&R Project #: 211727T
L&R Inspectors: John Mears and Eric Brinza
Report Date: November 30, 2021



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Idaho Division of Public Works
502 North 4th Street
Boise, Idaho, 83702

**RE: Limited Asbestos Inspection
St. Anthony Juvenile Corrections Center, Residence Building**

Idaho Division of Public Works (client) retained The L&R Group (L&R) to perform a National Emission Standards for Hazardous Air Pollutants (NESHAP) Asbestos Inspection for St. Anthony Juvenile Corrections Center, Residence Building (the property). L&R contracted with Eco-Dynamics Testing and Investigation's Certified Asbestos Inspectors, John Mears and Eric Brinza, to perform an on-site inspection for the NESHAP assessment on October 11, 2021 and November 8, 2021. The purpose of the assessment is to identify if asbestos containing materials (ACM) are present in the property building.

The report summarizes our inspection findings, laboratory results, and recommendations. This inspection report (*i.e., cover letter, report, and appendices*) is for the exclusive use of the client, and L&R does not authorize the use of the report to other parties without the expressed written permission of both the client and L&R.

L&R found the following for portions of the project scope area(s):

Asbestos Containing Materials Summary					
Total # of Sample(s) Collected	61	Total Homogeneous Area(s) Identified	27	Materials Identified or Assumed as ACM	7
ACM Sample Number	ACM Sample Description		ACM Sample Location		*Sq. Ft./LF
1-5	Texture on plaster		Living Room walls		~300
9-27	Texture on plaster		Utility Room ceiling		~75
9-29	Texture on wallboard		Garage/Storage ceiling		~250
10-31	Texture on plaster		Utility Room Walls		~250
10-32					
13-37	Sheet Vinyl		Kitchen under floor tile		~150
13-38					
17-43	Joint Compound		West Bathroom		unknown
*Please note that the quantities are an estimate. Therefore, exact quantities should be confirmed by the contractor prior to abatement activities these materials must always be removed using special abatement methods by a certified asbestos contractor prior to any renovation or demolition activity. Please refer to the attached asbestos analysis results.					

L&R appreciates the opportunity to work with you on this project and looks forward to a continued relationship as your environmental and laboratory consultant. Please do not hesitate to contact our offices at (208) 813-7700 with any questions, comments, or concerns.

Sincerely, The L&R Group, LLC

Prepared by: Laurie Kuther
Title: Laboratory Manager



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Limited Asbestos Inspection Report

Section 1 Project Information

Client/Company Name:	Idaho Division of Public Works
Client Address, City, State, Zip:	502 North 4 th Street, Boise, Idaho, 83702
Project Location:	St. Anthony Juvenile Corrections Center Residence Building
L&R Contracted Inspectors:	John Mears and Eric Brinza, Eco-Dynamics Testing and Investigations
L&R Inspection Date:	October 11, 2021 and November 8, 2021
Client #, Client PO, or Insurance #:	22-907

Notes: NA=Not Applicable

Section 2 Requested Project Scope Area(s)

Client Defined Scope Area(s):	Interior and Exterior
Project Scope:	<p>The client requested this project scope area(s) to include the following:</p> <ul style="list-style-type: none"> A detailed visual inspection for the presence of suspect ACM. Bulk sampling of suspect building materials to identify ACM. Analysis of the bulk samples by EPA 600/R-93/116 to determine the presence of asbestos.
Onsite Limitations:	N/A

Section 3 Inspection and Sampling Procedures

The inspection and testing were performed in accordance with current acceptable industry guidelines, and applicable Federal, State, and Local regulations. Guidelines and procedures for conducting and evaluating the various elements of the inspection are outlined in the following:

- 29 CFR 1926, Section 1101, Asbestos
- Portions of the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos Schools Hazard Abatement Reauthorization Act (ASHARA), and EPA Model Accreditation Program (MAP) as defined by 40 CFR 763; Subpart E, Appendix C
- 40 CFR 61, EPA National Emission Standards for Hazardous Air Pollutants (NESHAP)
- 40 CFR 261, Resource Conservation and Recovery Act (RCRA)

Section 4 Asbestos Containing Materials Summary

ACM Sample Number	ACM Sample Description	ACM Sample Location	*Sq. Ft./LF
1-5	Texture on plaster	Living Room	~300
9-27	Texture on plaster	Utility Room ceiling	~75
9-29	Texture on wallboard	Garage Storage ceiling	~250
10-31	Texture on plaster	Utility Room Walls	~250
10-32			
13-37	Sheet Vinyl	Kitchen under floor tile	~150
13-38			
17-43	Joint Compound	West Bathroom	unknown

*Please note that the quantities are an estimate. Therefore, exact quantities should be confirmed by the contractor prior to abatement activities these materials must always be removed using special abatement methods by a certified asbestos contractor prior to any renovation or demolition activity. Please refer to the attached asbestos analysis results.

Section 5 Non-Asbestos Materials Collected

Sample Description	Sample Location
Plaster (without texture)	East Bedroom walls and ceilings
Plaster (without texture)	Southeast Bedroom walls and ceilings
Plaster (without texture)	South Bedroom walls and ceilings
Plaster (without texture)	Hallway walls and ceilings
Plaster (without texture)	East Bathroom walls and ceilings
Plaster (without texture)	Dining Room walls and ceiling
Plaster (without texture)	Living Room ceiling
Plaster (without texture)	Utility Room ceiling
Drywall/Texture	Kitchen walls and ceiling
Drywall/Texture (Joint Compound is ACM)	West Bathroom walls
Drywall/Texture	Garage Storage Room walls
Sheet vinyl with Mastic	Utility Room, West Bathroom
Red Floor Tile with Mastic (over ACM sheet vinyl)	Kitchen top layer
Tarpaper (under hardwood)	Various
Insulation	Attic
Joint Compound	Kitchen, East Bathroom
Mastic	East Bathroom
Roof Coating	Exterior
Window Putty	Exterior
Brick and Mortar	Exterior
Insulation	Water Heater

Section 6 General Recommendations

L&R recommends that a certified asbestos worker and/or licensed asbestos contractor experienced in abatement solutions perform the cleanup, removal, and disposal of any ACM prior to demolition, renovation, repair, or restoration of the building.

For materials that should be presumed as ACM in locations that were not sampled, L&R recommends additional sampling and analysis of these materials prior to disturbance.

Section 7 Preliminary Cost Estimates

Preliminary cost estimates are provided for project budgeting and are based on estimates used throughout the industry. Estimates are based on removal of ACM within the building as a single abatement project. This is not a recommendation for removal of ACM within the structure.

Material Description

Abatement

Texture on Plaster approximately 625 sqft	\$6,500.00
Texture on Wallboard approximately 250 sqft	\$2,500.00
Sheet Vinyl w/ mastic and & paper backing approximately 250 sqft	\$2,500.00
Total	\$11,500.00

Section 8 Limitations and Disclaimer

This report was prepared for the use of Client and the conclusions and recommendations presented in this report are based upon the agreed upon scope of work outlined in the report and the Contract for Professional Services between Client and The L&R Group - Technical Services (L&R a.k.a. Inspection Company). Use or misuse of this report, or reliance upon the findings hereof by any parties other than the Client, is at their own risk. Neither Client nor Consultant make any representation of warranty to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown to Client or Consultant.

L&R cannot warrant or guarantee that our findings represent all possible hazardous materials that may be hidden within the structure or that the information provided is complete or accurate as these environmental methods are limited to the conditions observed at the time of the inspection and the report is limited to the information available at the time it was prepared. There is a possibility that conditions exist that could not be identified within the scope of the inspection or that were not apparent during the inspection. As such, L&R shall not be liable for failure to discover any conditions other than readily apparent and visible.

Certain areas of the structure may be considered inaccessible or impractical to inspect, including but not limited to, the following:

1. areas not readily accessible or deemed unsafe at the discretion of inspector;
2. interior wall and ceiling cavities, portions of the attic / crawlspace concealed or made inaccessible by insulation, equipment or ducting;
3. areas of the attic / crawlspace or roof cavity obscured due to inadequate crawl space.

Whenever feasible, L&R performs limited discrete and destructive sampling techniques and methods. However, L&R cannot guarantee, without the complete deconstruction of structure's components, that hidden hazards or toxic materials are not remaining within the building. Thus, additional sampling may be necessary if demolition, renovation, or repair activities expose previously unidentified building materials or debris. During demolition, renovation or repair activities, a National Emission Standard for Hazardous Air Pollutants (NESHAP) Competent Person must be on site in the event additional materials or hazards are discovered and/or disturbed as outlined in Environmental Protection Agency (EPA) regulations 40 CFR Part 61.

Per Federal, State and Local Regulations, Identify All Possible Hazards Prior To Performing Work. Prior to commencing work activities and/or the removal or disturbance of any building materials, NESHAP and other regulations require that a facility be inspected for asbestos and other hazardous materials, regardless of age. Building materials that may be disturbed should be assessed for asbestos and lead-based paint hazards and appropriate measures should be followed in accordance with applicable federal, state and local regulations. Asbestos containing products are currently legal to use, install and purchase in the United States. Some common asbestos containing products include but are not limited to: drywall, wall and ceiling textures, joint compounds, flooring materials such as sheet vinyl and floor tiles, cove base, mastics, leveling compounds, insulation, and pipe wraps. Other hazards could include but are not limited to: Lead-based paint, other lead hazards, Mold, Mercury, Nuisance Dust, PCBs, Silica, VOCs.

Federal law 24 CFR part 35 and 40 CFR part 745 also requires seller and lessors of residential units constructed prior to 1978, except housing for elderly (unless any child resides or is expected to reside in such housing) or any zero-bedroom dwelling to disclose and provide a copy of this report to new purchasers or leases before they become obligated under a lease or sales contract. Property owners and sellers are also required to distribute an educational pamphlet approved by the USEPA and include standard warning language in leases or sales contracts to ensure that occupants and parents have the information needed to protect themselves and children from lead-based paint hazards.

For additional laws and regulations pertaining to lead, lead based paint and lead hazards please refer to the EPA's website <https://www.epa.gov/lead/lead-laws-and-regulations>.



Section 9 Asbestos Regulations

The EPA regulates the abatement and disposal of asbestos-containing materials from any public or private building involving demolition, renovation, repair, construction, and maintenance activities. The EPA certifies and licenses asbestos-removal contractors, inspects asbestos-abatement projects, and enforces laws regarding the proper removal and disposal of asbestos-containing materials. In addition, the agency provides homeowners education about the dangers of exposure to asbestos and how to deal with asbestos in the home. For additional Asbestos Laws and Regulations please reference the EPA's website <https://www.epa.gov/asbestos/asbestos-laws-and-regulations>.

EPA 40 CFR 763 – Describes response actions, operations and maintenance, training and periodic surveillance, management plans, recordkeeping, warning labels, as well as compliance and enforcement.

EPA 40 CFR 61.145 – Provides standards for demolition, renovation and thorough inspection requirements.

EPA 40 CFR 61, Subpart M NESHAP – Covers National Emission Standards for Hazardous Air Pollutants.

OSHA is responsible for establishing standards to protect the health and safety of workers who may be exposed to asbestos. OSHA sets out several provisions' employers must follow to comply with the asbestos standard such as exposure limits and guidelines for exposure monitoring, medical surveillance, record keeping, regulated areas, and communication of hazards. For additional resources and information please reference OSHA's website at <https://www.osha.gov/SLTC/asbestos/>.

- For regulations pertinent to worker protection - OSHA Asbestos Construction Standard 29 CFR 1926.1101, or the Asbestos Worker Protection Rule at 40 CFR 763.120, whichever is applicable.
- OSHA 29 CFR 1926.1101 – Construction Standard applies to building demolition and renovation operations and other activities where asbestos is removed or encapsulated. It also covers building maintenance and emergency cleanup of asbestos.
- OSHA 29 CFR 1910.1001 – General Industry Standard covers maintenance work and routine housekeeping activities.
- OSHA 29 CFR 1910.134 – Provides Respiratory Protection Standards.
- OSHA 3151-12R and 1910-1001(H) – Personal protection equipment selection and reference.

Additional regulations may apply:

- Client and contractor should read and understand the details in 1926.1101(k)(1i) and section k in general.
- Client and contractor must understand their responsibilities to perform due diligence prior to the commencement of work or disturbance, i.e., to identify and communicate the presence (or assumed presence), location and quantity of ACM.
- General Industry Standard (29 CFR 1910.1001) (j)(3) - Duties of employers and building and facility owners.
- 1910.1001(j)(3)(i) - Building and facility owners shall determine the presence, location, and quantity of ACM and/or PACM at the work site. Employers and building and facility owners shall exercise due diligence in complying with these requirements to inform employers and employees about the presence and location of ACM and PACM.
- 1910.1001(j)(3)(ii) - Building and facility owners shall maintain records of all information required to be provided pursuant to this section and/or otherwise known to the building owner concerning the presence, location and quantity of ACM and PACM in the building/facility. Such records shall be kept for the duration of ownership and shall be transferred to successive owners.
- 1910.1001(j)(3)(iii) - Building and facility owners shall inform employers of employees, and employers shall inform employees who will perform housekeeping activities in areas which contain ACM and/or PACM of the presence and location of ACM and/or PACM in such areas which may be contacted during such activities.



Appendix A

Terms/Acronym	Definition
ACBM	Asbestos Containing Building Materials (surfacing, TSI or miscellaneous ACM within a building).
ACM	Asbestos Containing Material containing greater than 1% asbestos.
Acoustical Material	Material often containing asbestos, perlite, vermiculite, etc. applied to ceilings or walls to dampen sound.
Action Level	An OSHA standard for asbestos exposure. Action level means an airborne concentration of asbestos above which an employer must institute certain provisions (see 29 CFR 1926.58). The Action Level has been eliminated by OSHA as of October 1994 (see 29CFR 1926.1101).
Adequately Wetted	Sufficiently mixed or coated with water of an aqueous solution to prevent the release of particulates. If visible emissions are observed coming from asbestos containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.
ASHERA	Asbestos Hazard Emergency Response Act of 1986.
Air Plenum	Space above a ceiling used for the circulation of air through a building.
Air Samples	Samples of airborne fibers taken by drawing air through a filter to trap the airborne fibers. Analyzed by PCM or electron microscopy.
Amosite	Brown asbestos, brittle fibers, high resistance to heat.
APR	Air purifying respirator.
ASHAA	Asbestos School Hazard Abatement Act of 1984.
Asbestos	A term used to define a group of naturally occurring silicate minerals, occurring as parallel bundles of fibers, called "fibrils".
Asbestos Management Plan	A document to assist in administering the asbestos programs in a facility.
Asbestosis	A chronic disease during which the lungs become scarred as a result of a biological reaction to the inhalation of asbestos fibers.
Assumed ACM	Assumed or suspected asbestos containing material.
Category I Nonfriable ACM	An asbestos containing packing, gasket, resilient floor covering, and asphalt roofing product containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.
Category II Nonfriable ACM	Any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
CFR	Code of Federal Regulations.
Chrysotile	White asbestos, fine silky fibers, flexible with high tensile strength.
Competent Person	A competent person is one capable of identifying existing asbestos hazards in the workplace and who has the authority to take a corrective action. Duties include establishing the negative-pressure enclosure, controlling entry and exit of all employees, etc. The competent person must be trained in all aspects of asbestos abatement and the contents of the OSHA asbestos standard.
Condition Factors	Describe the physical condition ACM.
Control Options	Methods of reducing or eliminating the exposure potential of asbestos-containing materials e.g. removal, enclosure, encapsulation, operations and maintenance.
Corrugated Paper	A type of thermal insulation characterized by brown "cardboard box" type corrugated paper wrapped around pipes or applied in sheets to boilers and tanks. Usually contains woven asbestos with paper.
Corrective Action	An activity undertaken to reduce or eliminate the exposure potential of ACM: enclosure, encapsulation, removal, or operations and maintenance.
Crawl Space	The area of the building below the ground floor, but above the ground, often only a few feet high.
Demolition	The wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of a building.
Doffing	The process of taking off personal protective equipment.
Donning	The process of putting on personal protective equipment.
Emergency Renovation	A renovation operation that was not planned, but results from a sudden, unexpected event. This term includes operation necessitated by nonroutine failures of equipment.
Encapsulation	Treatment of ACM with a material that surrounds or embeds the asbestos fibers in an adhesive matrix to prevent the release of fibers as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).
Enclosure	Construction of an airtight, impermeable, permanent barrier around ACM to control the release of fibers into the air.



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Exposure	A quantification of the population at risk and the magnitude and duration of their exposure.
EPA	Environmental Protection Agency. The agency charged with implementing AHERA.
Facility	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. For purposes of this definition, any building, structure, or installation that contains a loft used as a dwelling is not considered a residential structure, installation, or building. Any structure, installation or building that was previously subject to this subpart is not excluded, regardless of its current use or function.
Facility Component	Any Pipe, duct, boiler, tank, reactor, turbine, or furnace at or in a facility; or any structural member of a facility.
f/cc	Fibers per cubic centimeter. A measurement to express the level of fibers in the air.
Fiber Release Episode	Any uncontrolled or unintentional disturbance of ACM resulting in visible emissions.
Fibrils	A small bundle of individual fibers.
Fireproofing	Material sprayed onto building structural members to prevent or retard their loss of strength in case of fire. Often contains asbestos.
Fit-Testing	The act of ensuring a respirator has a proper seal to the wearers face and works properly.
Friable	Easily reduced to powder by hand pressure when dry.
Friable Asbestos Material	Any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, can be crumbled pulverized, or reduced to powder by hand pressure.
Functional Space	A room or area designated by a person accredited to prepare management plans.
Glove Bag	A device used to remove small sections of asbestos.
Grinding	Means to reduce to powder or small fragments and includes mechanical chipping or drilling.
Hazard	A circumstance, mechanism, or event which was the potential to create injury.
HEPA	High Efficiency Particulate Air.
Homogeneous Area	An area of asbestos-containing material where the material is consistent in texture, color, and age.
In Poor Condition	Means the binding of the material is losing its integrity as indicated by peeling, cracking, or crumbling of the material.
Inadvertent Contamination	The disturbance of asbestos containing products not caused intentionally by the parties involved in the project.
Inspection	The process of locating ACM, determining its condition, and reporting the results.
Latency	Period before the presence of a disease is manifested by symptoms.
LEA	Local Education Agency, generally a school district.
Liability	Legally bound or obligated.
Magnesia	A type of thermal insulation, generally white fibrous material pre-formed into shaped pieces or as bricks, often contains asbestos.
Mechanical Area	An area of building not normally accessed by the public containing air handling, air conditioners, heat exchanges, tanks, pipes, or other mechanical equipment.
Mechanical System	The heating, ventilation, air conditioning, and plumbing components of a facility.
Medical Surveillance Program	A program to ensure workers are physically and psychologically able to wear a respirator and perform asbestos activities.
Miscellaneous Material	Interior building material on structural components, structural members or fixtures, that does not include thermal or surfacing material.
Mudded Joint Fittings	Plaster compound packed onto pipe joints and around valves, pumps, elbows, tees for thermal insulation. Often contains asbestos.
NESHAP	National Emission Standards for Hazardous Air Pollutants.
NIOSH	National Institute of Occupational Safety and Health. The agency who sets standards for respirators and other protective equipment.
Negative Air	A process by which air is continually removed from the work area to keep the air pressure in the work area less than the air pressure outside the work area. A registered trademark.
Nonfriable ACM	Means any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
Not Part of Scope	Area never defined as work area, or area excluded from work area.
O & M	Operations and Maintenance.
OSHA	Occupational Safety and Health Administration. The agency responsible for protecting worker health and safety.
Outside Air	The air outside buildings and structures.



Outside of Scope	Material may within defined scope area, but material sampling was not defined as part of scope.
Owner/Operator Demolition or Renovation	Means any person who owns, leases, operates, controls, or supervised the facility being demolished. or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both.
Packing	Material applied to tanks, boilers, ducts, air handlers for thermal insulation. Often contains asbestos.
PACM	Presumed Asbestos Containing Material (PACM): All TSI, Surfacing & resilient flooring in buildings construction prior to 1981, must be presumed to be ACM, and must be treated as ACM.
PAPR	Powered Air Purifying Respirator.
PCM	Phase Contrast Microscopy. A method used to analyze air samples for the presence of fibers.
PEL	Permissible Exposure Limit, a level of airborne asbestos above which no employee shall be exposed. The PEL is 0.1 f/cc of air as an 8-hour time-weighted average (see 29 CFR 1926.1101).
Planned Renovation	A renovation operation, or a number of such options, in which the amount of friable asbestos material that will be removed or stripped within a given period of time can be predicted. Individual nonscheduled operations are included if a number of such operations can be predicted to occur during a given period of time based on operating experience.
PLM	Polarized Light Microscopy. A method used to analyze bulk samples for the presence of asbestos.
PPE	Personal protective equipment is equipment worn to minimized exposure to hazards that could cause serious injury or illnesses.
RACM	Regulated Asbestos Containing Materials a) Friable asbestos material, b) Category I nonfriable ACM that has become friable, c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces, expected become friable in the course of demolition, renovation or removal operations regulated by this subpart.
Regulated Areas	Areas that exceed or may exceed airborne concentrations beyond permissible exposure limits of 0.1 f/cc.
Reinspection	A periodic reevaluation of the ACM over a regular time period.
Removal	Taking out or stripping of substantially all ACM from a damage area, functional space, or homogeneous area.
Renovation	Altering in any way one or more facility components. Operations in which load-supporting structural members are wrecked or taken out are excluded.
Repair	Returning damaged ACM to an undamaged condition or to an intact state so as to contain fiber release.
Respiratory Protection Program	A program to provide the information, training, and equipment necessary for proper respiratory protection while working with ACM.
Response Action	A method, including removal, encapsulation, enclosure, repair, and operation and maintenance, that protects human health and the environment from friable ACBM.
Routine Maintenance Area	An area, such as a boiler room or mechanical room, not normally frequented by the public in which maintenance employees or contract workers regularly conduct maintenance activities.
Salient	A limited area of significantly different material condition within a homogeneous area.
SEM	Scanning Electron Microscopy. A method to analyze air samples for the presence of asbestos.
Service Personnel	People engaged in repair, maintenance, and/or custodial activities.
Structural System	The system of beams, walls, piers, and such that supports a building.
Surfacing Material	Material in a building that is either sprayed-on, troweled-on, or otherwise applied to surfaces such as acoustical plaster on ceilings and fireproofing material on structural members, or other materials used for acoustical, fireproofing, or other purposes. Often contains asbestos.
Symbols	Drawn figures which represent real objects. Symbols are the "short-hand" of architectural and mechanical drawings.
TEM	Transmission Electron Microscopy. A method to analyze air samples or bulk samples for the presence of asbestos.
Thermal System Insulation	Material in a building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior mechanical components to prevent heat loss or gain, or water condensation, or for any other purpose.
Tradesmen	People engaged in the construction trade, i.e. electricians, plumbers, carpenters, painters, etc.
TSCA	Toxic Substances Control Act.
TWA	Time Weighted Average. An average concentration of material over a set period of time.
"Tyvek"	Brand name of DuPont for a disposable clothing worn during asbestos work.
Visible Emissions	Any emissions containing particulate asbestos material that area visually detectable without the aid of instruments.
Wet Cleaning	A cleaning technique where the material is kept wet and/or wet towels or mops are used to reduce the potential for material becoming airborne.
Wrapped Paper	A type of thermal insulation characterized by layers of Kraft paper wrapped around pipes. There is usually a layer of woven asbestos paper or "tar" paper imbedded with asbestos.



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Appendix B

Limited Asbestos Inspection

Residence Cottage
2220 East 600 North Street, St. Anthony, Idaho 83445

Prepared For:
The L&R Group
680 South Progress Avenue #2a
Meridian, Idaho, 83642

Eco-Dynamics Project #: 1114
Eco-Dynamics Project Managers: John Mears & Eric Brinza
Report Date: October 19, 2021

Eco-Dynamics

Testing & Investigations

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Nampa, Idaho 83686

Eric Brinza: Ericbrinza@gmail.com (763)-913-4437
John Mears: Johnmears09@gmail.com (208)-982-5484

The L&R Group
RE: Limited Asbestos Inspection
2220 East 600 North Street, St. Anthony, Idaho 83445

The L&R Group (client) retained Eco-Dynamics to perform a Limited Asbestos Inspection (LAI) for the Residence Cottage building in the Saint Anthony Juvenile Corrections Facility located at 2220 East 600 North Street, in St. Anthony, Idaho. John Mears & Eric Brinza, Certified Asbestos Inspectors, performed the on-site inspection on October 11, 2021. The purpose of the LAI is to identify if asbestos containing materials (ACM) are present using limited sampling methods conducted only within the client defined scope area(s).

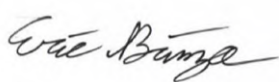
The report summarizes our inspection findings, laboratory results, and recommendations. This inspection report (*i.e., cover letter, report, and appendices*) is for the exclusive use of the client, and Eco-Dynamics does not authorize the use of the report to other parties without the expressed written permission of both the client and Eco-Dynamics.

Eco-Dynamics found the following for all (or portions) of the project scope area(s):

Asbestos Containing Materials Summary					
Total # of Sample(s) Collected	49	Total Homogeneous Area(s) Identified	23	Materials Identified or Assumed as ACM	13
ACM Sample Number	ACM Sample Description		ACM Sample Location		*Sq. Ft./LF
1-1,2,3,4,5	Plaster wall w/ skim coat		East Bedroom, S.E. Bedroom, Hallway, Dining Room, Living Room		~1800
9-27,28,29	Plaster wall w/ skim coat & Drywall w/ Texture		West Bathroom ceiling, Utility Room Ceiling, Garage/storage Room Ceiling		~450
10-30,31,32	Plaster wall w/ skim coat		Utility Room Walls		~260
13-37,38	Vinyl Floor Tile		Kitchen		~250
17-43	Joint Compound		West Bathroom		Unknown
*Please note that the quantities are an estimate. Therefore, exact quantities should be confirmed by the contractor prior to abatement activities these materials must always be removed using special abatement methods by a certified asbestos contractor prior to any renovation or demolition activity. Please refer to the attached asbestos analysis results.					

Eco-Dynamics appreciates the opportunity to work with you on this project and looks forward to a continued relationship as your environmental consultant. Please feel free to contact us at any time with any questions, comments, or concerns.

Sincerely, Eco-Dynamics, LLC



Conducted by: John Mears & Eric Brinza
Title: Project Manager(s) / Asbestos & Lead Inspectors

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Appendices

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Appendix C	Photographic Log

Limited Asbestos Inspection Report

Section 1 Project Information	
Client/Company Name:	The L&R Group
Project Location:	Residence Cottage – St. Anthony Juvenile Detention Facility 2220 East 600 North Street, Boise, Idaho
Inspectors/Project Manager:	John Mears & Eric Brinza
Eco-Dynamics Inspection Date:	October 11, 2021
Client #, Client PO, or Insurance #:	NA

Notes: NA=Not Applicable

Section 2 Requested Project Scope Area(s)	
Client Defined Scope Area(s):	Full asbestos sampling survey for building demolition.
Project Scope:	The client requested this project scope area(s) to include the following: <ul style="list-style-type: none"> A detailed visual inspection for the presence of suspect ACM. Bulk sampling of suspect building materials to identify ACM. Analysis of the bulk samples by EPA 600/R-93/116 to determine the presence of asbestos.
Onsite Limitations:	Samples were not collected from the concealed interior of fire door core insulating materials suspected to contain friable ACM.

Section 3 Property Site Characteristics						
Property Type		Approximate Year Occupied		Approximate Square Footage		# of Levels
Juvenile Corrections Living Quarters		Unknown		~2000		1
Structure Occupied		Normal Living /Operating Conditions		State of Collapse		Property Impacted
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A

Section 4 Inspection and Sampling Procedures
Eco-Dynamics performed the inspection and testing in accordance with current acceptable industry guidelines, and applicable Federal, State, and Local regulations. Guidelines and procedures for conducting and evaluating the various elements of the inspection are outlined in the following: <ul style="list-style-type: none"> 29 CFR 1926, Section 1101, Asbestos Portions of the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos Schools Hazard Abatement Reauthorization Act (ASHARA), and EPA Model Accreditation Program (MAP) as defined by 40 CFR 763; Subpart E, Appendix C 40 CFR 61, EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 261, Resource Conservation and Recovery Act (RCRA)

Section 5 General Recommendations

Eco-Dynamics recommends that a certified asbestos worker and/or licensed asbestos contractor experienced in abatement solutions perform the cleanup, removal, and disposal of any ACM and ACM contaminated debris prior to demolition, renovation, repair, or restoration of the building.

Section 6 Limitations and Disclaimer

This report was prepared for the use of Client and the conclusions and recommendations presented in this report are based upon the agreed upon scope of work outlined in the report and the Contract for Professional Services between Client and Eco-Dynamics. Use or misuse of this report, or reliance upon the findings hereof by any parties other than the Client, is at their own risk. Neither Client nor Consultant make any representation of warranty to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown to Client or Consultant.

Eco-Dynamics cannot warrant or guarantee that our findings represent all possible hazardous materials that may be hidden within the structure or that the information provided is complete or accurate as these environmental methods are limited to the conditions observed at the time of the inspection and the report is limited to the information available at the time it was prepared. There is a possibility that conditions exist that could not be identified within the scope of the inspection or that were not apparent during the inspection. As such, Eco-Dynamics shall not be liable for failure to discover any conditions other than readily apparent and visible.

Certain areas of the structure may be considered inaccessible or impractical to inspect, including but not limited to, the following:

1. areas not readily accessible or deemed unsafe at the discretion of inspector;
2. interior wall and ceiling cavities, portions of the attic / crawlspace concealed or made inaccessible by insulation, equipment or ducting;
3. areas of the attic / crawlspace or roof cavity obscured due to inadequate crawl space.

Whenever feasible, Eco-Dynamics performs limited discrete and destructive sampling techniques and methods. However, Eco-Dynamics cannot guarantee, without the complete deconstruction of structure's components, that hidden hazards or toxic materials are not remaining within the building. Thus, additional sampling may be necessary if demolition, renovation or repair activities expose previously unidentified building materials or debris. During demolition, renovation or repair activities, a National Emission Standard for Hazardous Air Pollutants (NESHAP) Competent Person must be on site in the event additional materials or hazards are discovered and/or disturbed as outlined in Environmental Protection Agency (EPA) regulations 40 CFR Part 61.

Per Federal, State and Local Regulations, Identify All Possible Hazards Prior To Performing Work. Prior to commencing work activities and/or the removal or disturbance of any building materials, NESHAP and other regulations require that a facility be inspected for asbestos and other hazardous materials, regardless of age. Building materials that may be disturbed should be assessed for asbestos and lead-based paint hazards and appropriate measures should be followed in accordance with applicable federal, state and local regulations. Asbestos containing products are currently legal to use, install and purchase in the United States. Some common asbestos containing products include but are not limited to: drywall, wall and ceiling textures, joint compounds, flooring materials such as sheet vinyl and floor tiles, cove base, mastics, leveling compounds, insulation, and pipe wraps. Other hazards could include but are not limited to: Lead-based paint, other lead hazards, Mold, Mercury, Nuisance Dust, PCBs, Silica, VOCs.

Federal law 24 CFR part 35 and 40 CFR part 745 also requires seller and lessors of residential units constructed prior to 1978, except housing for elderly (unless any child resides or is expected to reside in such housing) or any zero-bedroom dwelling to disclose and provide a copy of this report to new purchasers or leases before they become obligated under a lease or sales contract. Property owners and sellers are also required to distribute an educational pamphlet approved by the USEPA and include standard warning language in leases or sales contracts to ensure that occupants and parents have the information needed to protect themselves and children from lead-based paint hazards.

For additional laws and regulations pertaining to lead, lead based paint and lead hazards please refer to the EPA's website <https://www.epa.gov/lead/lead-laws-and-regulations>.

Section 7 Asbestos Regulations

The EPA regulates the abatement and disposal of asbestos-containing materials from any public or private building involving demolition, renovation, repair, construction, and maintenance activities. The EPA certifies and licenses asbestos-removal contractors, inspects asbestos-abatement projects, and enforces laws regarding the proper removal and disposal of asbestos-containing materials. In addition, the agency provides homeowners education about the dangers of exposure to asbestos and how to deal with asbestos in the home. For additional Asbestos Laws and Regulations please reference the EPA's website <https://www.epa.gov/asbestos/asbestos-laws-and-regulations>.

EPA 40 CFR 763 – Describes response actions, operations and maintenance, training and periodic surveillance, management plans, recordkeeping, warning labels, as well as compliance and enforcement.

EPA 40 CFR 61.145 – Provides standards for demolition, renovation and thorough inspection requirements.

EPA 40 CFR 61, Subpart M NESHAP – Covers National Emission Standards for Hazardous Air Pollutants.

OSHA is responsible for establishing standards to protect the health and safety of workers who may be exposed to asbestos. OSHA sets out several provisions' employers must follow to comply with the asbestos standard such as exposure limits and guidelines for exposure monitoring, medical surveillance, record keeping, regulated areas, and communication of hazards. For additional resources and information please reference OSHA's website at <https://www.osha.gov/SLTC/asbestos/>.

- For regulations pertinent to worker protection - OSHA Asbestos Construction Standard 29 CFR 1926.1101, or the Asbestos Worker Protection Rule at 40 CFR 763.120, whichever is applicable.
- OSHA 29 CFR 1926.1101 – Construction Standard applies to building demolition and renovation operations and other activities where asbestos is removed or encapsulated. It also covers building maintenance and emergency cleanup of asbestos.
- OSHA 29 CFR 1910.1001 – General Industry Standard covers maintenance work and routine housekeeping activities.
- OSHA 29 CFR 1910.134 – Provides Respiratory Protection Standards.
- OSHA 3151-12R and 1910-1001(H) – Personal protection equipment selection and reference.

Additional regulations may apply:

- Client and contractor should read and understand the details in 1926.1101(k)(1i) and section k in general.
- Client and contractor must understand their responsibilities to perform due diligence prior to the commencement of work or disturbance, i.e., to identify and communicate the presence (or assumed presence), location and quantity of ACM.
- General Industry Standard (29 CFR 1910.1001) (j)(3) - Duties of employers and building and facility owners.
- 1910.1001(j)(3)(i) - Building and facility owners shall determine the presence, location, and quantity of ACM and/or PACM at the work site. Employers and building and facility owners shall exercise due diligence in complying with these requirements to inform employers and employees about the presence and location of ACM and PACM.
- 1910.1001(j)(3)(ii) - Building and facility owners shall maintain records of all information required to be provided pursuant to this section and/or otherwise known to the building owner concerning the presence, location and quantity of ACM and PACM in the building/facility. Such records shall be kept for the duration of ownership and shall be transferred to successive owners.
- 1910.1001(j)(3)(iii) - Building and facility owners shall inform employers of employees, and employers shall inform employees who will perform housekeeping activities in areas which contain ACM and/or PACM of the presence and location of ACM and/or PACM in such areas which may be contacted during such activities.

Eco-Dynamics

Testing & Investigations

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Appendix A

Terms/Acronym	Definition
ACBM	Asbestos Containing Building Materials (surfacing, TSI or miscellaneous ACM within a building).
ACM	Asbestos Containing Material containing greater than 1% asbestos.
Acoustical Material	Material often containing asbestos, perlite, vermiculite, etc. applied to ceilings or walls to dampen sound.
Action Level	An OSHA standard for asbestos exposure. Action level means an airborne concentration of asbestos above which an employer must institute certain provisions (see 29 CFR 1926.58). The Action Level has been eliminated by OSHA as of October 1994 (see 29CFR 1926.1101).
Adequately Wetted	Sufficiently mixed or coated with water of an aqueous solution to prevent the release of particulates. If visible emissions are observed coming from asbestos containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.
ASHERA	Asbestos Hazard Emergency Response Act of 1986.
Air Plenum	Space above a ceiling used for the circulation of air through a building.
Air Samples	Samples of airborne fibers taken by drawing air through a filter to trap the airborne fibers. Analyzed by PCM or electron microscopy.
Amosite	Brown asbestos, brittle fibers, high resistance to heat.
APR	Air purifying respirator.
ASHAA	Asbestos School Hazard Abatement Act of 1984.
Asbestos	A term used to define a group of naturally occurring silicate minerals, occurring as parallel bundles of fibers, called "fibrils".
Asbestos Management Plan	A document to assist in administering the asbestos programs in a facility.
Asbestosis	A chronic disease during which the lungs become scarred as a result of a biological reaction to the inhalation of asbestos fibers.
Assumed ACM	Assumed or suspected asbestos containing material.
Category I Nonfriable ACM	An asbestos containing packing, gasket, resilient floor covering, and asphalt roofing product containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.
Category II Nonfriable ACM	Any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
CFR	Code of Federal Regulations.
Chrysotile	White asbestos, fine silky fibers, flexible with high tensile strength.
Competent Person	A competent person is one capable of identifying existing asbestos hazards in the workplace and who has the authority to take a corrective action. Duties include establishing the negative-pressure enclosure, controlling entry and exit of all employees, etc. The competent person must be trained in all aspects of asbestos abatement and the contents of the OSHA asbestos standard.
Condition Factors	Describe the physical condition ACM.
Control Options	Methods of reducing or eliminating the exposure potential of asbestos-containing materials e.g. removal, enclosure, encapsulation, operations and maintenance.
Corrugated Paper	A type of thermal insulation characterized by brown "cardboard box" type corrugated paper wrapped around pipes or applied in sheets to boilers and tanks. Usually contains woven asbestos with paper.
Corrective Action	An activity undertaken to reduce or eliminate the exposure potential of ACM: enclosure, encapsulation, removal, or operations and maintenance.
Crawl Space	The area of the building below the ground floor, but above the ground, often only a few feet high.
Demolition	The wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of a building.
Doffing	The process of taking off personal protective equipment.
Donning	The process of putting on personal protective equipment.
Emergency Renovation	A renovation operation that was not planned, but results from a sudden, unexpected event. This term includes operation necessitated by nonroutine failures of equipment.
Encapsulation	Treatment of ACM with a material that surrounds or embeds the asbestos fibers in an adhesive matrix to prevent the release of fibers as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).
Enclosure	Construction of an airtight, impermeable, permanent barrier around ACM to control the release of fibers into the air.
Exposure	A quantification of the population at risk and the magnitude and duration of their exposure.

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EPA	Environmental Protection Agency. The agency charged with implementing AHERA.
Facility	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. For purposes of this definition, any building, structure, or installation that contains a loft used as a dwelling is not considered a residential structure, installation, or building. Any structure, installation or building that was previously subject to this subpart is not excluded, regardless of its current use or function.
Facility Component	Any Pipe, duct, boiler, tank, reactor, turbine, or furnace at or in a facility; or any structural member of a facility.
f/cc	Fibers per cubic centimeter. A measurement to express the level of fibers in the air.
Fiber Release Episode	Any uncontrolled or unintentional disturbance of ACM resulting in visible emissions.
Fibrils	A small bundle of individual fibers.
Fireproofing	Material sprayed onto building structural members to prevent or retard their loss of strength in case of fire. Often contains asbestos.
Fit-Testing	The act of ensuring a respirator has a proper seal to the wearers face and works properly.
Friable	Easily reduced to powder by hand pressure when dry.
Friable Asbestos Material	Any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, can be crumbled pulverized, or reduced to powder by hand pressure.
Functional Space	A room or area designated by a person accredited to prepare management plans.
Glove Bag	A device used to remove small sections of asbestos.
Grinding	Means to reduce to powder or small fragments and includes mechanical chipping or drilling.
Hazard	A circumstance, mechanism, or event which was the potential to create injury.
HEPA	High Efficiency Particulate Air.
Homogeneous Area	An area of asbestos-containing material where the material is consistent in texture, color, and age.
In Poor Condition	Means the binding of the material is losing its integrity as indicated by peeling, cracking, or crumbling of the material.
Inadvertent Contamination	The disturbance of asbestos containing products not caused intentionally by the parties involved in the project.
Inspection	The process of locating ACM, determining its condition, and reporting the results.
Latency	Period before the presence of a disease is manifested by symptoms.
LEA	Local Education Agency, generally a school district.
Liability	Legally bound or obligated.
Magnesia	A type of thermal insulation, generally white fibrous material pre-formed into shaped pieces or as bricks, often contains asbestos.
Mechanical Area	An area of building not normally accessed by the public containing air handling, air conditioners, heat exchanges, tanks, pipes, or other mechanical equipment.
Mechanical System	The heating, ventilation, air conditioning, and plumbing components of a facility.
Medical Surveillance Program	A program to ensure workers are physically and psychologically able to wear a respirator and perform asbestos activities.
Miscellaneous Material	Interior building material on structural components, structural members or fixtures, that does not include thermal or surfacing material.
Mudded Joint Fittings	Plaster compound packed onto pipe joints and around valves, pumps, elbows, tees for thermal insulation. Often contains asbestos.
NESHAP	National Emission Standards for Hazardous Air Pollutants.
NIOSH	National Institute of Occupational Safety and Health. The agency who sets standards for respirators and other protective equipment.
Negative Air	A process by which air is continually removed from the work area to keep the air pressure in the work area less than the air pressure outside the work area. A registered trademark.
Nonfriable ACM	Means any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
Not Part of Scope	Area never defined as work area, or area excluded from work area.
O & M	Operations and Maintenance.
OSHA	Occupational Safety and Health Administration. The agency responsible for protecting worker health and safety.
Outside Air	The air outside buildings and structures.
Outside of Scope	Material may within defined scope area, but material sampling was not defined as part of scope.

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Owner/Operator Demolition or Renovation	Means any person who owns, leases, operates, controls, or supervised the facility being demolished. or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both.
Packing	Material applied to tanks, boilers, ducts, air handlers for thermal insulation. Often contains asbestos.
PACM	Presumed Asbestos Containing Material (PACM): All TSI, Surfacing & resilient flooring in buildings construction prior to 1981, must be presumed to be ACM, and must be treated as ACM.
PAPR	Powered Air Purifying Respirator.
PCM	Phase Contrast Microscopy. A method used to analyze air samples for the presence of fibers.
PEL	Permissible Exposure Limit, a level of airborne asbestos above which no employee shall be exposed. The PEL is 0.1 f/cc of air as an 8-hour time-weighted average (see 29 CFR 1926.1101).
Planned Renovation	A renovation operation, or a number of such options, in which the amount of friable asbestos material that will be removed or stripped within a given period of time can be predicted. Individual nonscheduled operations are included if a number of such operations can be predicted to occur during a given period of time based on operating experience.
PLM	Polarized Light Microscopy. A method used to analyze bulk samples for the presence of asbestos.
PPE	Personal protective equipment is equipment worn to minimized exposure to hazards that could cause serious injury or illnesses.
RACM	Regulated Asbestos Containing Materials <ul style="list-style-type: none"> a) Friable asbestos material, b) Category I nonfriable ACM that has become friable, c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces, expected become friable in the course of demolition, renovation or removal operations regulated by this subpart.
Regulated Areas	Areas that exceed or may exceed airborne concentrations beyond permissible exposure limits of 0.1 f/cc.
Reinspection	A periodic reevaluation of the ACM over a regular time period.
Removal	Taking out or stripping of substantially all ACM from a damage area, functional space, or homogeneous area.
Renovation	Altering in any way one or more facility components. Operations in which load-supporting structural members are wrecked or taken out are excluded.
Repair	Returning damaged ACM to an undamaged condition or to an intact state so as to contain fiber release.
Respiratory Protection Program	A program to provide the information, training, and equipment necessary for proper respiratory protection while working with ACM.
Response Action	A method, including removal, encapsulation, enclosure, repair, and operation and maintenance, that protects human health and the environment from friable ACBM.
Routine Maintenance Area	An area, such as a boiler room or mechanical room, not normally frequented by the public in which maintenance employees or contract workers regularly conduct maintenance activities.
Salient	A limited area of significantly different material condition within a homogeneous area.
SEM	Scanning Electron Microscopy. A method to analyze air samples for the presence of asbestos.
Service Personnel	People engaged in repair, maintenance, and/or custodial activities.
Structural System	The system of beams, walls, piers, and such that supports a building.
Surfacing Material	Material in a building that is either sprayed-on, troweled-on, or otherwise applied to surfaces such as acoustical plaster on ceilings and fireproofing material on structural members, or other materials used for acoustical, fireproofing, or other purposes. Often contains asbestos.
Symbols	Drawn figures which represent real objects. Symbols are the "short-hand" of architectural and mechanical drawings.
TEM	Transmission Electron Microscopy. A method to analyze air samples or bulk samples for the presence of asbestos.
Thermal System Insulation	Material in a building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior mechanical components to prevent heat loss or gain, or water condensation, or for any other purpose.
Tradesmen	People engaged in the construction trade, i.e. electricians, plumbers, carpenters, painters, etc.
TSCA	Toxic Substances Control Act.
TWA	Time Weighted Average. An average concentration of material over a set period of time.
"Tyvek"	Brand name of DuPont for a disposable clothing worn during asbestos work.
Visible Emissions	Any emissions containing particulate asbestos material that area visually detectable without the aid of instruments.
Wet Cleaning	A cleaning technique where the material is kept wet and/or wet towels or mops are used to reduce the potential for material becoming airborne.
Wrapped Paper	A type of thermal insulation characterized by layers of Kraft paper wrapped around pipes. There is usually a layer of woven asbestos paper or "tar" paper imbedded with asbestos.

Appendix B



Attention: Idaho Division of Public Works

PO Box 83720

Boise ID 83720

ICD 2220 E. 600 North St.

Project: Anthony ID 83445 (Residence)

Received Date: 10/14/2021

Analysis Date: 10/18/2021

Phone: 208-322-1908

LIMS ID: 21101406

L&R Client ID: 1016

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1-1 21101406.01	L+P / East Bedroom Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
1-2 21101406.02	L+P / South East Bedroom Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
1-3 21101406.03	L+P / South Bedroom Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
1-4 21101406.04	L+P / Hallway Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
1-5 21101406.05	L+P / Living Room Wall	Texture, Fibrous, Firm, Homogenous / Tan		97% Other	3% Chrysotile
Comment :					
1-5 21101406.05	L+P / Living Room Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
2-6 21101406.06	L+P / East Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
2-7 21101406.07	L+P / East Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
2-8 21101406.08	L+P / South East Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
3-9 21101406.09	L+P / South Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
3-10 21101406.10	L+P / South Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected

Analyst : **Laurie Kuther**

Reviewed By: **Noah Poulin**

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Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	% Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
Comment :					
3-11 21101406.11	L+P / South Bedroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
4-12 21101406.12	L+P / East Bathroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
4-13 21101406.13	L+P / East Bathroom Wall	Drywall/texture, Fibrous, Firm, Layered / Brown/White	20% Cellulose	80% Other	None Detected
Comment :					
4-14 21101406.14	L+P / East Bathroom Wall	Drywall/texture, Fibrous, Firm, Layered / Brown/White	20% Cellulose	80% Other	None Detected
Comment :					
5-15 21101406.15	L+P / Diningroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
5-16 21101406.16	L+P / Hall Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
5-17 21101406.17	L+P / Livingroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
6-18 21101406.18	L+P / Kitchen Wall East	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
6-19 21101406.19	L+P / Kitchen Wall South	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
6-20 21101406.20	L+P / Kitchen Wall West	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected

Comment :


 Analyst : **Laurie Kuther**


 Reviewed By: **Noah Poulin**

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L&R Client ID: 1016

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
7-21 21101406.21	Wall Board / Kitchen Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
7-22 21101406.22	Wall Board / Kitchen Ceiling	Drywall/texture, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
7-23 21101406.23	Wall Board / Kitchen Ceiling	Drywall/texture, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
8-24 21101406.24	Wall Board / West Bathroom Wall	Drywall/texture, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
8-25 21101406.25	Wall Board / Garage/Storage Room South	Drywall/texture, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
8-26 21101406.26	Wall Board / Garage/Storage Room North	Drywall/texture, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
9-27 21101406.27	L+P / West Bathroom Ceiling	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
9-27 21101406.27	L+P / West Bathroom Ceiling	Texture, Fibrous, Firm, Homogenous / White		97% Other	3% Chrysotile
Comment :					
9-28 21101406.28	L+P / Utility Room Ceiling	Plaster w/ Skim Coat, Fibrous, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
9-29 21101406.29	Wall Board / Garage/Storage Ceiling	Drywall, Fibrous, Firm, Layered / Tan/White	20% Cellulose	80% Other	None Detected
Comment :					
9-29 21101406.29	Wall Board / Garage/Storage Ceiling	Texture, Fibrous, Firm, Homogenous / White		97% Other	3% Chrysotile

 Analyst : **Laurie Kuther**

 Reviewed By: **Noah Poulin**

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Attention: Idaho Division of Public Works

PO Box 83720

Boise ID 83720

ICD 2220 E. 600 North St.

Project: Anthony ID 83445 (Residence)

Received Date: 10/14/2021

Analysis Date: 10/18/2021

Phone: 208-322-1908

LIMS ID: 21101406

L&R Client ID: 1016

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	% Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
Comment :					
10-30 21101406.30	L+P / Utility Room West Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
10-31 21101406.31	L+P / Utility Room South Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
10-31 21101406.31	L+P / Utility Room South Wall	Texture, Fibrous, Firm, Homogenous / White		97% Other	3% Chrysotile
Comment :					
10-32 21101406.32	L+P / Utility Room North Wall	Plaster w/ Skim Coat, Firm, Granular, Homogenous / White		100% Other	None Detected
Comment :					
10-32 21101406.32	L+P / Utility Room North Wall	Texture, Fibrous, Firm, Homogenous / White		97% Other	3% Chrysotile
Comment :					
11-33 21101406.33	Sheet Vinyl / Utility Room	Sheet Flooring & Mastic, Firm, Homogenous / Black/Brown/White		100% Other	None Detected
Comment :					
11-34 21101406.34	Sheet Vinyl / Utility Room	Sheet Flooring & Mastic, Firm, Homogenous / Black/Brown/White		100% Other	None Detected
Comment :					
12-35 21101406.35	Sheet Vinyl / West Bathroom	Sheet Flooring & Mastic, Firm, Homogenous / Tan/White		100% Other	None Detected
Comment :					
12-36 21101406.36	Sheet Vinyl / West Bathroom	Sheet Flooring & Mastic, Firm, Homogenous / Tan/White		100% Other	None Detected
Comment :					
13-37 21101406.37	Vinyl Floor Tile / Kitchen Tile	Vinyl & Mastic, Firm, Homogenous / Black/Tan		100% Other	None Detected

Comment :

Analyst : **Laurie Kuther**

Reviewed By: **Noah Poulin**

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Phone: 208-322-1908

LIMS ID: 21101406

L&R Client ID: 1016

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
13-37 21101406.37	Vinyl Floor Tile / Kitchen Tile	Sheet Flooring(Top), Firm, Homogenous / Red		100% Other	None Detected
Comment :					
13-37 21101406.37	Vinyl Floor Tile / Kitchen Tile	Sheet Flooring Backing, Fibrous, Firm, Homogenous / White	30% Cellulose	10% Other	60% Chrysotile
Comment :					
13-38 21101406.38	Vinyl Floor Tile / Kitchen Tile	Not Analyzed Postive Stop /		0% Other	Sample Not Analyzed
Comment :					
14-39 21101406.39	Tar Paper Under Hardwood	Felt , Fibrous, Firm, Homogenous / Black	70% Cellulose	30% Other	None Detected
Comment :					
14-40 21101406.40	Tar Paper Under Hardwood	Felt , Fibrous, Firm, Homogenous / Black	70% Cellulose	30% Other	None Detected
Comment :					
15-41 21101406.41	Attic Insulation	Insulation, Fibrous, Homogenous / Tan	100% Cellulose	0% Other	None Detected
Comment :					
16-42 21101406.42	Joint Compound / Kitchen	Joint Compound, Firm, Homogenous / White		100% Other	None Detected
Comment :					
17-43 21101406.43	Joint Compound / West Bathroom	Joint Compound, Fibrous, Firm, Homogenous / White		97% Other	3% Chrysotile
Comment :					
18-44 21101406.44	Joint Compound / East Bathroom	Joint Compound, Firm, Homogenous / White		100% Other	None Detected
Comment :					
19-45 21101406.45	Mastic / East Bathroom	Mastic, Firm, Homogenous / Black/Brown		100% Other	None Detected
Comment :					
20-46 21101406.46	Roof Coating	Roof Material, Firm, Granular, Homogenous / Black		100% Other	None Detected

 Analyst : **Laurie Kuther**

 Reviewed By: **Noah Poulin**

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LIMS ID: 21101406

L&R Client ID: 1016

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

			Non-Asbestos		Asbestos
Sample	Description	Appearance	% Fibrous	% Non-Fibrous	% Type
Comment :					
21-47 21101406.47	Window Putty / West Windows Exterior	Window Putty, Firm, Homogenous / White		100% Other	None Detected
Comment :					
22-48 21101406.48	Brick and Mortar / Exterior	Brick and Mortar, Firm, Granular, Homogenous / Tan		100% Other	None Detected
Comment :					
23-49 21101406.49	Insulation / Water Heater	Insulation, Fibrous, Firm, Layered / Black/Pink/Tan	30% Cellulose 30% Fiberglass	40% Other	None Detected
Comment :					

Analyst : **Laurie Kuther**

Reviewed By: **Noah Poulin**

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Appendix C



1) Living Room – Texture on walling material positive for asbestos.



2) East Bedroom – Texture on walling material positive for asbestos.



3) Southeast Bedroom – Texture on walling material positive for asbestos.



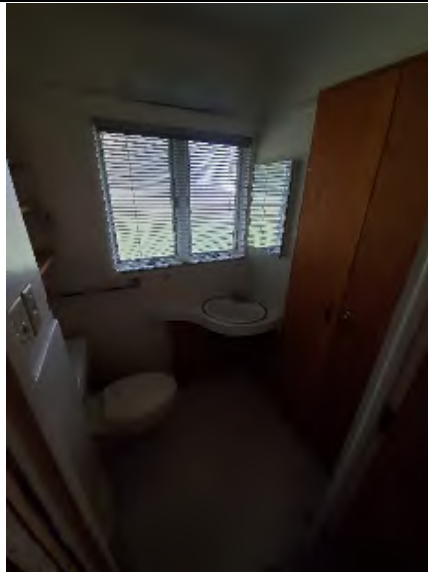
4) South Bedroom – Texture on walling material positive for asbestos.



5) Hallway – Texture on walling material positive for asbestos.



6) Utility Room – Texture on walling and ceiling material positive for asbestos.



7) West Bathroom – Texture on ceiling material & joint compound positive for asbestos.



8) Garage/Storage – Texture on ceiling material positive for asbestos.



9) Kitchen – Paper backing under sheet flooring positive for asbestos (located under red floor tile).

Limited Asbestos Inspection

Residence Cottage #2

2220 East 600 North Street, St. Anthony, Idaho 83445

Prepared For:

The L&R Group

680 South Progress Avenue #2a

Meridian, Idaho, 83642

Eco-Dynamics Project #: 1114

Eco-Dynamics Project Managers: John Mears & Eric Brinza

Report Date: November 10, 2021

Eco-Dynamics

Testing & Investigations

2519 South Canyon Street
Nampa, Idaho 83686

Eric Brinza: Ericbrinza@gmail.com (763)-913-4437
John Mears: Johnmears09@gmail.com (208)-982-5484

The L&R Group
RE: Limited Asbestos Inspection
2220 East 600 North Street, St. Anthony, Idaho 83445

The L&R Group (client) retained Eco-Dynamics to perform a Limited Asbestos Inspection (LAI) for the Residence Cottage building located at the Saint Anthony Juvenile Corrections Facility located at 2220 East 600 North Street, in St. Anthony, Idaho. John Mears & Eric Brinza, Certified Asbestos Inspectors, performed the on-site inspection on November 8th, 2021. The purpose of the LAI is to identify if asbestos containing materials (ACM) are present using limited sampling methods conducted only within the client defined scope area(s).

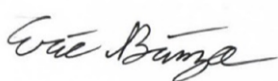
The report summarizes our inspection findings, laboratory results, and recommendations. This inspection report (*i.e., cover letter, report, and appendices*) is for the exclusive use of the client, and Eco-Dynamics does not authorize the use of the report to other parties without the expressed written permission of both the client and Eco-Dynamics.

Eco-Dynamics found the following for all (or portions) of the project scope area(s):

Asbestos Containing Materials Summary					
Total # of Sample(s) Collected	12	Total Homogeneous Area(s) Identified	12	Materials Identified or Assumed as ACM	0
ACM Sample Number	ACM Sample Description		ACM Sample Location		*Sq. Ft./LF
N/A	N/A		N/A		N/A
*Please note that the quantities are an estimate. Therefore, exact quantities should be confirmed by the contactor prior to abatement activities these materials must always be removed using special abatement methods by a certified asbestos contactor prior to any renovation or demolition activity. Please refer to the attached asbestos analysis results.					

Eco-Dynamics appreciates the opportunity to work with you on this project and looks forward to a continued relationship as your environmental consultant. Please feel free to contact us at any time with any questions, comments, or concerns.

Sincerely, Eco-Dynamics, LLC



Conducted by: John Mears & Eric Brinza
Title: Project Manager(s) / Asbestos & Lead Inspectors

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Appendices

Appendix A	Glossary
Appendix B	Asbestos Laboratory Report

Limited Asbestos Inspection Report

Section 1 Project Information	
Client/Company Name:	The L&R Group
Project Location:	Residence Cottage #2 – St. Anthony Juvenile Detention Facility 2220 East 600 North Street, Boise, Idaho
Inspectors/Project Manager:	John Mears & Eric Brinza
Eco-Dynamics Inspection Date:	November 8 th , 2021
Client #, Client PO, or Insurance #:	NA

Notes: NA=Not Applicable

Section 2 Requested Project Scope Area(s)	
Client Defined Scope Area(s):	Full asbestos sampling survey for building demolition.
Project Scope:	The client requested this project scope area(s) to include the following: <ul style="list-style-type: none"> A detailed visual inspection for the presence of suspect ACM. Bulk sampling of suspect building materials to identify ACM. Analysis of the bulk samples by EPA 600/R-93/116 to determine the presence of asbestos.
Onsite Limitations:	Samples were not collected from the concealed interior of fire door core insulating materials suspected to contain friable ACM.

Section 3 Property Site Characteristics						
Property Type		Approximate Year Occupied		Approximate Square Footage		# of Levels
Juvenile Corrections Living Quarters		Unknown		~2000		1
Structure Occupied		Normal Living /Operating Conditions		State of Collapse		Property Impacted
Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A

Section 4 Inspection and Sampling Procedures
Eco-Dynamics performed the inspection and testing in accordance with current acceptable industry guidelines, and applicable Federal, State, and Local regulations. Guidelines and procedures for conducting and evaluating the various elements of the inspection are outlined in the following: <ul style="list-style-type: none"> 29 CFR 1926, Section 1101, Asbestos Portions of the Asbestos Hazard Emergency Response Act (AHERA), the Asbestos Schools Hazard Abatement Reauthorization Act (ASHARA), and EPA Model Accreditation Program (MAP) as defined by 40 CFR 763; Subpart E, Appendix C 40 CFR 61, EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 261, Resource Conservation and Recovery Act (RCRA)

Section 5 General Recommendations

This is 1 of 2 asbestos surveys recently completed on the structure referred to as the "Residence" located at the Saint Anthony Juvenile Corrections Facility. The sample collected in the living room on the October 11th, 2021, was identified as ACM. A second sample was collected from the same living room wall on November 8th, 2021 and no ACM was identified. Eco-Dynamics recommends that the original survey from October 11th, 2021, be followed for any remodel or demolition performed within the living room, dining room, and hallway.

Eco-Dynamics recommends that a certified asbestos worker and/or licensed asbestos contractor experienced in abatement solutions perform the cleanup, removal, and disposal of any ACM and ACM contaminated debris prior to demolition, renovation, repair, or restoration of the building.

Section 6 Limitations and Disclaimer

This report was prepared for the use of Client and the conclusions and recommendations presented in this report are based upon the agreed upon scope of work outlined in the report and the Contract for Professional Services between Client and Eco-Dynamics. Use or misuse of this report, or reliance upon the findings hereof by any parties other than the Client, is at their own risk. Neither Client nor Consultant make any representation of warranty to such other parties as to the accuracy or completeness of this report or the suitability of its use by such other parties for any purpose whatever, known or unknown to Client or Consultant.

Eco-Dynamics cannot warrant or guarantee that our findings represent all possible hazardous materials that may be hidden within the structure or that the information provided is complete or accurate as these environmental methods are limited to the conditions observed at the time of the inspection and the report is limited to the information available at the time it was prepared. There is a possibility that conditions exist that could not be identified within the scope of the inspection or that were not apparent during the inspection. As such, Eco-Dynamics shall not be liable for failure to discover any conditions other than readily apparent and visible.

Certain areas of the structure may be considered inaccessible or impractical to inspect, including but not limited to, the following:

1. areas not readily accessible or deemed unsafe at the discretion of inspector;
2. interior wall and ceiling cavities, portions of the attic / crawlspace concealed or made inaccessible by insulation, equipment or ducting;
3. areas of the attic / crawlspace or roof cavity obscured due to inadequate crawl space.

Whenever feasible, Eco-Dynamics performs limited discrete and destructive sampling techniques and methods. However, Eco-Dynamics cannot guarantee, without the complete deconstruction of structure's components, that hidden hazards or toxic materials are not remaining within the building. Thus, additional sampling may be necessary if demolition, renovation or repair activities expose previously unidentified building materials or debris. During demolition, renovation or repair activities, a National Emission Standard for Hazardous Air Pollutants (NESHAP) Competent Person must be on site in the event additional materials or hazards are discovered and/or disturbed as outlined in Environmental Protection Agency (EPA) regulations 40 CFR Part 61.

Per Federal, State and Local Regulations, Identify All Possible Hazards Prior To Performing Work. Prior to commencing work activities and/or the removal or disturbance of any building materials, NESHAP and other regulations require that a facility be inspected for asbestos and other hazardous materials, regardless of age. Building materials that may be disturbed should be assessed for asbestos and lead-based paint hazards and appropriate measures should be followed in accordance with applicable federal, state and local regulations. Asbestos containing products are currently legal to use, install and purchase in the United States. Some common asbestos containing products include but are not limited to: drywall, wall and ceiling textures, joint compounds, flooring materials such as sheet vinyl and floor tiles, cove base, mastics, leveling compounds, insulation, and pipe wraps. Other hazards could include but are not limited to: Lead-based paint, other lead hazards, Mold, Mercury, Nuisance Dust, PCBs, Silica, VOCs.

Federal law 24 CFR part 35 and 40 CFR part 745 also requires seller and lessors of residential units constructed prior to 1978, except housing for elderly (unless any child resides or is expected to reside in such housing) or any zero-bedroom dwelling to disclose and provide a copy of this report to new purchasers or leases before they become obligated under a lease or sales contract. Property owners and sellers are also required to distribute an educational pamphlet approved by the USEPA and include standard warning language in leases or sales contracts to ensure that occupants and parents have the information needed to protect themselves and children from lead-based paint hazards.

For additional laws and regulations pertaining to lead, lead based paint and lead hazards please refer to the EPA's website <https://www.epa.gov/lead/lead-laws-and-regulations>.

Section 7 Asbestos Regulations

The EPA regulates the abatement and disposal of asbestos-containing materials from any public or private building involving demolition, renovation, repair, construction, and maintenance activities. The EPA certifies and licenses asbestos-removal contractors, inspects asbestos-abatement projects, and enforces laws regarding the proper removal and disposal of asbestos-containing materials. In addition, the agency provides homeowners education about the dangers of exposure to asbestos and how to deal with asbestos in the home. For additional Asbestos Laws and Regulations please reference the EPA's website <https://www.epa.gov/asbestos/asbestos-laws-and-regulations>.

EPA 40 CFR 763 – Describes response actions, operations and maintenance, training and periodic surveillance, management plans, recordkeeping, warning labels, as well as compliance and enforcement.

EPA 40 CFR 61.145 – Provides standards for demolition, renovation and thorough inspection requirements.

EPA 40 CFR 61, Subpart M NESHAP – Covers National Emission Standards for Hazardous Air Pollutants.

OSHA is responsible for establishing standards to protect the health and safety of workers who may be exposed to asbestos. OSHA sets out several provisions' employers must follow to comply with the asbestos standard such as exposure limits and guidelines for exposure monitoring, medical surveillance, record keeping, regulated areas, and communication of hazards. For additional resources and information please reference OSHA's website at <https://www.osha.gov/SLTC/asbestos/>.

- For regulations pertinent to worker protection - OSHA Asbestos Construction Standard 29 CFR 1926.1101, or the Asbestos Worker Protection Rule at 40 CFR 763.120, whichever is applicable.
- OSHA 29 CFR 1926.1101 – Construction Standard applies to building demolition and renovation operations and other activities where asbestos is removed or encapsulated. It also covers building maintenance and emergency cleanup of asbestos.
- OSHA 29 CFR 1910.1001 – General Industry Standard covers maintenance work and routine housekeeping activities.
- OSHA 29 CFR 1910.134 – Provides Respiratory Protection Standards.
- OSHA 3151-12R and 1910-1001(H) – Personal protection equipment selection and reference.

Additional regulations may apply:

- Client and contractor should read and understand the details in 1926.1101(k)(1i) and section k in general.
- Client and contractor must understand their responsibilities to perform due diligence prior to the commencement of work or disturbance, i.e., to identify and communicate the presence (or assumed presence), location and quantity of ACM.
- General Industry Standard (29 CFR 1910.1001) (j)(3) - Duties of employers and building and facility owners.
- 1910.1001(j)(3)(i) - Building and facility owners shall determine the presence, location, and quantity of ACM and/or PACM at the work site. Employers and building and facility owners shall exercise due diligence in complying with these requirements to inform employers and employees about the presence and location of ACM and PACM.
- 1910.1001(j)(3)(ii) - Building and facility owners shall maintain records of all information required to be provided pursuant to this section and/or otherwise known to the building owner concerning the presence, location and quantity of ACM and PACM in the building/facility. Such records shall be kept for the duration of ownership and shall be transferred to successive owners.
- 1910.1001(j)(3)(iii) - Building and facility owners shall inform employers of employees, and employers shall inform employees who will perform housekeeping activities in areas which contain ACM and/or PACM of the presence and location of ACM and/or PACM in such areas which may be contacted during such activities.

Eco-Dynamics

Testing & Investigations

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John Mears: Johnmears09@gmail.com (208)-982-5484

Appendix A

Terms/Acronym	Definition
ACBM	Asbestos Containing Building Materials (surfacing, TSI or miscellaneous ACM within a building).
ACM	Asbestos Containing Material containing greater than 1% asbestos.
Acoustical Material	Material often containing asbestos, perlite, vermiculite, etc. applied to ceilings or walls to dampen sound.
Action Level	An OSHA standard for asbestos exposure. Action level means an airborne concentration of asbestos above which an employer must institute certain provisions (see 29 CFR 1926.58). The Action Level has been eliminated by OSHA as of October 1994 (see 29CFR 1926.1101).
Adequately Wetted	Sufficiently mixed or coated with water of an aqueous solution to prevent the release of particulates. If visible emissions are observed coming from asbestos containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not sufficient evidence of being adequately wet.
ASHERA	Asbestos Hazard Emergency Response Act of 1986.
Air Plenum	Space above a ceiling used for the circulation of air through a building.
Air Samples	Samples of airborne fibers taken by drawing air through a filter to trap the airborne fibers. Analyzed by PCM or electron microscopy.
Amosite	Brown asbestos, brittle fibers, high resistance to heat.
APR	Air purifying respirator.
ASHAA	Asbestos School Hazard Abatement Act of 1984.
Asbestos	A term used to define a group of naturally occurring silicate minerals, occurring as parallel bundles of fibers, called "fibrils".
Asbestos Management Plan	A document to assist in administering the asbestos programs in a facility.
Asbestosis	A chronic disease during which the lungs become scarred as a result of a biological reaction to the inhalation of asbestos fibers.
Assumed ACM	Assumed or suspected asbestos containing material.
Category I Nonfriable ACM	An asbestos containing packing, gasket, resilient floor covering, and asphalt roofing product containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.
Category II Nonfriable ACM	Any material, excluding Category I nonfriable ACM, containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
CFR	Code of Federal Regulations.
Chrysotile	White asbestos, fine silky fibers, flexible with high tensile strength.
Competent Person	A competent person is one capable of identifying existing asbestos hazards in the workplace and who has the authority to take a corrective action. Duties include establishing the negative-pressure enclosure, controlling entry and exit of all employees, etc. The competent person must be trained in all aspects of asbestos abatement and the contents of the OSHA asbestos standard.
Condition Factors	Describe the physical condition ACM.
Control Options	Methods of reducing or eliminating the exposure potential of asbestos-containing materials e.g. removal, enclosure, encapsulation, operations and maintenance.
Corrugated Paper	A type of thermal insulation characterized by brown "cardboard box" type corrugated paper wrapped around pipes or applied in sheets to boilers and tanks. Usually contains woven asbestos with paper.
Corrective Action	An activity undertaken to reduce or eliminate the exposure potential of ACM: enclosure, encapsulation, removal, or operations and maintenance.
Crawl Space	The area of the building below the ground floor, but above the ground, often only a few feet high.
Demolition	The wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of a building.
Doffing	The process of taking off personal protective equipment.
Donning	The process of putting on personal protective equipment.
Emergency Renovation	A renovation operation that was not planned, but results from a sudden, unexpected event. This term includes operation necessitated by nonroutine failures of equipment.
Encapsulation	Treatment of ACM with a material that surrounds or embeds the asbestos fibers in an adhesive matrix to prevent the release of fibers as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).
Enclosure	Construction of an airtight, impermeable, permanent barrier around ACM to control the release of fibers into the air.
Exposure	A quantification of the population at risk and the magnitude and duration of their exposure.

Eco-Dynamics

Testing & Investigations

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EPA	Environmental Protection Agency. The agency charged with implementing AHERA.
Facility	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. For purposes of this definition, any building, structure, or installation that contains a loft used as a dwelling is not considered a residential structure, installation, or building. Any structure, installation or building that was previously subject to this subpart is not excluded, regardless of its current use or function.
Facility Component	Any Pipe, duct, boiler, tank, reactor, turbine, or furnace at or in a facility; or any structural member of a facility.
f/cc	Fibers per cubic centimeter. A measurement to express the level of fibers in the air.
Fiber Release Episode	Any uncontrolled or unintentional disturbance of ACM resulting in visible emissions.
Fibrils	A small bundle of individual fibers.
Fireproofing	Material sprayed onto building structural members to prevent or retard their loss of strength in case of fire. Often contains asbestos.
Fit-Testing	The act of ensuring a respirator has a proper seal to the wearers face and works properly.
Friable	Easily reduced to powder by hand pressure when dry.
Friable Asbestos Material	Any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, can be crumbled pulverized, or reduced to powder by hand pressure.
Functional Space	A room or area designated by a person accredited to prepare management plans.
Glove Bag	A device used to remove small sections of asbestos.
Grinding	Means to reduce to powder or small fragments and includes mechanical chipping or drilling.
Hazard	A circumstance, mechanism, or event which was the potential to create injury.
HEPA	High Efficiency Particulate Air.
Homogeneous Area	An area of asbestos-containing material where the material is consistent in texture, color, and age.
In Poor Condition	Means the binding of the material is losing its integrity as indicated by peeling, cracking, or crumbling of the material.
Inadvertent Contamination	The disturbance of asbestos containing products not caused intentionally by the parties involved in the project.
Inspection	The process of locating ACM, determining its condition, and reporting the results.
Latency	Period before the presence of a disease is manifested by symptoms.
LEA	Local Education Agency, generally a school district.
Liability	Legally bound or obligated.
Magnesia	A type of thermal insulation, generally white fibrous material pre-formed into shaped pieces or as bricks, often contains asbestos.
Mechanical Area	An area of building not normally accessed by the public containing air handling, air conditioners, heat exchanges, tanks, pipes, or other mechanical equipment.
Mechanical System	The heating, ventilation, air conditioning, and plumbing components of a facility.
Medical Surveillance Program	A program to ensure workers are physically and psychologically able to wear a respirator and perform asbestos activities.
Miscellaneous Material	Interior building material on structural components, structural members or fixtures, that does not include thermal or surfacing material.
Mudded Joint Fittings	Plaster compound packed onto pipe joints and around valves, pumps, elbows, tees for thermal insulation. Often contains asbestos.
NESHAP	National Emission Standards for Hazardous Air Pollutants.
NIOSH	National Institute of Occupational Safety and Health. The agency who sets standards for respirators and other protective equipment.
Negative Air	A process by which air is continually removed from the work area to keep the air pressure in the work area less than the air pressure outside the work area. A registered trademark.
Nonfriable ACM	Means any material containing more than 1 percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
Not Part of Scope	Area never defined as work area, or area excluded from work area.
O & M	Operations and Maintenance.
OSHA	Occupational Safety and Health Administration. The agency responsible for protecting worker health and safety.
Outside Air	The air outside buildings and structures.
Outside of Scope	Material may within defined scope area, but material sampling was not defined as part of scope.

Eco-Dynamics

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Owner/Operator Demolition or Renovation	Means any person who owns, leases, operates, controls, or supervised the facility being demolished. or renovated or any person who owns, leases, operates, controls, or supervises the demolition or renovation operation, or both.
Packing	Material applied to tanks, boilers, ducts, air handlers for thermal insulation. Often contains asbestos.
PACM	Presumed Asbestos Containing Material (PACM): All TSI, Surfacing & resilient flooring in buildings construction prior to 1981, must be presumed to be ACM, and must be treated as ACM.
PAPR	Powered Air Purifying Respirator.
PCM	Phase Contrast Microscopy. A method used to analyze air samples for the presence of fibers.
PEL	Permissible Exposure Limit, a level of airborne asbestos above which no employee shall be exposed. The PEL is 0.1 f/cc of air as an 8-hour time-weighted average (see 29 CFR 1926.1101).
Planned Renovation	A renovation operation, or a number of such options, in which the amount of friable asbestos material that will be removed or stripped within a given period of time can be predicted. Individual nonscheduled operations are included if a number of such operations can be predicted to occur during a given period of time based on operating experience.
PLM	Polarized Light Microscopy. A method used to analyze bulk samples for the presence of asbestos.
PPE	Personal protective equipment is equipment worn to minimized exposure to hazards that could cause serious injury or illnesses.
RACM	Regulated Asbestos Containing Materials <ul style="list-style-type: none"> a) Friable asbestos material, b) Category I nonfriable ACM that has become friable, c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces, expected become friable in the course of demolition, renovation or removal operations regulated by this subpart.
Regulated Areas	Areas that exceed or may exceed airborne concentrations beyond permissible exposure limits of 0.1 f/cc.
Reinspection	A periodic reevaluation of the ACM over a regular time period.
Removal	Taking out or stripping of substantially all ACM from a damage area, functional space, or homogeneous area.
Renovation	Altering in any way one or more facility components. Operations in which load-supporting structural members are wrecked or taken out are excluded.
Repair	Returning damaged ACM to an undamaged condition or to an intact state so as to contain fiber release.
Respiratory Protection Program	A program to provide the information, training, and equipment necessary for proper respiratory protection while working with ACM.
Response Action	A method, including removal, encapsulation, enclosure, repair, and operation and maintenance, that protects human health and the environment from friable ACBM.
Routine Maintenance Area	An area, such as a boiler room or mechanical room, not normally frequented by the public in which maintenance employees or contract workers regularly conduct maintenance activities.
Salient	A limited area of significantly different material condition within a homogeneous area.
SEM	Scanning Electron Microscopy. A method to analyze air samples for the presence of asbestos.
Service Personnel	People engaged in repair, maintenance, and/or custodial activities.
Structural System	The system of beams, walls, piers, and such that supports a building.
Surfacing Material	Material in a building that is either sprayed-on, troweled-on, or otherwise applied to surfaces such as acoustical plaster on ceilings and fireproofing material on structural members, or other materials used for acoustical, fireproofing, or other purposes. Often contains asbestos.
Symbols	Drawn figures which represent real objects. Symbols are the "short-hand" of architectural and mechanical drawings.
TEM	Transmission Electron Microscopy. A method to analyze air samples or bulk samples for the presence of asbestos.
Thermal System Insulation	Material in a building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior mechanical components to prevent heat loss or gain, or water condensation, or for any other purpose.
Tradesmen	People engaged in the construction trade, i.e. electricians, plumbers, carpenters, painters, etc.
TSCA	Toxic Substances Control Act.
TWA	Time Weighted Average. An average concentration of material over a set period of time.
"Tyvek"	Brand name of DuPont for a disposable clothing worn during asbestos work.
Visible Emissions	Any emissions containing particulate asbestos material that area visually detectable without the aid of instruments.
Wet Cleaning	A cleaning technique where the material is kept wet and/or wet towels or mops are used to reduce the potential for material becoming airborne.
Wrapped Paper	A type of thermal insulation characterized by layers of Kraft paper wrapped around pipes. There is usually a layer of woven asbestos paper or "tar" paper imbedded with asbestos.

Appendix B

Attention: Eco-Dynamic Testing & Investigations

 2522 N Arthur St
 Boise ID 83703

Received Date: 11/10/2021

Analysis Date: 11/10/2021

Project: Residence Building supplemental
 samples

Phone: 763-913-4437

LIMS ID: 21111008

L&R Client ID: 1091

L&R Project ID: 211727T

Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1-1.B 21111008.01	L&P/East bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
1-2.B 21111008.02	L&P/East bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
1-3.B 21111008.03	L&P/East bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
2-4.B 21111008.04	L&P/SE bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
2-5.B 21111008.05	L&P/SE bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
2-6.B 21111008.06	L&P/SE bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
3-7.B 21111008.07	L&P/South bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
3-8.B 21111008.08	L&P/South bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
3-8.B 21111008.09	L&P/South bedroom	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
4-10.B 21111008.10	L&P/Living room	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					



Analyst : Laurie Kuther



Reviewed By: Noah Poulin

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Analyst: Laurie Kuther

Analysis of Bulk Materials using Polarized Light Microscopy (EPA Method 600/R-93/116)

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
4-11.B 21111008.11	L&P/Dining room	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected
Comment :					
4-12.B 21111008.12	L&P/Hall	Plaster w/ Skim Coat, Firm, Granular, Layered / White		100% Other	None Detected

Comment :


 Analyst : **Laurie Kuther**


 Reviewed By: **Noah Poulin**

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