



11815 NE 99th Street, Suite 1294  
Vancouver, WA 98662  
Voice: 360-574-3058  
Fax: 360-576-0925  
Web: <https://www.swcleanair.gov>  
Email: [Tina@swcleanair.gov](mailto:Tina@swcleanair.gov)

## Notice of Intent to Remove Asbestos

Case #: 24-105

Amendment: 0

Date Received: 2/19/2024

Date Paid: 2/19/2024

SWCAA Fee: \$369.00

Receipt #: 151443339

**This notification MUST be present at all times at the asbestos project sit**

Quantity to be removed: 750 Square Feet 0 Linear Feet

Workshift days: Sa

Project starting date: 3/2/2024

Project Completion date: 3/2/2024

Workshift hours: 8:00AM-3:30PM

Site Name: LIVEZAY

Site address: 318 S. MAPLE HILL RD

Location of Asbestos: MOBILE HOME ROOF

City/State/Zip: Kelso

WA

98626

☐ Demolition of Structure (Notification of Demolition required)

County: CLARK COUNTY

☒ Asbestos survey conducted?

No survey reason:

AHERA Inspector: Joel Dillard

Certification #: IN-231415-C

### Material to be Removed:

☐ Fireproofing ☐ Popcorn Ceiling ☐ CAB ☐ Sheet Vinyl ☐ Boiler Insulation ☐ Duct Tape

☐ Duct Paper ☐ Mag Pipe Insulation

☐ Air Cell

☐ CA Pipe

☐ VAT

☒ Other SILVER PAINT ROOFING

### Control Methods:

☐ N.P Enclosure

☐ Glove Bag

☐ Mini Enclosure

☐ Wrap and Cut

☒ Water

☐ HEPA Vac

☒ Other LAY PLASTIC ON GROUND AROUND WORK AREA, REGULATE WORK AREA, APPLY ASBESTOS SIGNAGE, APPLY THE

Asbestos Contractor: Lions Contracting

Phone: 503-270-8180

Mailing Address: PO Box 16875, Portland, OR, 97292

Email: [lionscontracting@outlook.com](mailto:lionscontracting@outlook.com)

Certification ##: ABCN00001764

Supervisor: LUCAS LEON SANTIAGO

Phone: 503-998-1501

Property Owner: MEGAN LIVESAY

Phone: 360-957-7157

Mailing Address: 318 S. MAPLE HILL RD, KELSO WA 98626

Asbestos Disposal Site: Hillsboro Landfill: 3205 SE Minter Bridge Rd, Hillsboro, OR, 97123-

**I DO HEREBY CERTIFY THAT THE INFORMATION CONTAINED IN THIS NOTIFICATION IS,  
TO THE BEST OF MY KNOWLEDGE, ACCURATE AND COMPLETE.**

Submitter Name: Chrystal Leon

Representing: Lions Contracting

Submitter Title: President

Date Submitted: 2/19/2024

Reviewed by SWCAA: Brian Fallon

☒ Approved



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## **Asbestos Survey Report**



**Presented To: Megan Livezey**

**Survey Location: 318 S Maple Hill Rd, Kelso, WA 98626**

**Inspection Date: February 9th 2024**

**Prepared by:**

**Joel Dillard  
Of  
Atlas Labs Inc.  
Environmental Testing Services  
CCB #: 231684**

## **1.0 EXECUTIVE SUMMARY**

## **2.0 GENERAL INFORMATION**

### **2.1 Project Information**

### **2.2 Procedures**

#### **2.2.1 Plan and Specification Review**

#### **2.2.2 Walk Through and Visual Survey**

#### **2.2.3 Bulk Sampling**

#### **2.2.4 Analyses of Bulk Samples**

## **3.0 CONTROLLING**

### **3.1 Removal and Disposal**

### **3.2 Encapsulation**

### **3.3 Enclosure**

### **3.4 Repair**

### **3.5 Operations and Maintenance Programs**

## **4.0 Material Quantifications**

### **4.1 Homogenous Materials/Areas**

## **5.0 Qualifications of the Report**

## **APPENDICES**

### **APPENDIX A - Laboratory Results of Suspect Asbestos Bulk Sample Analyses**

### **APPENDIX B - Suspect Asbestos Containing Material Sample Locations/Drawings**

### **APPENDIX C - EPA / AHERA Building Inspector Certification**



## **Building/Structure Information**

**Owner/Operator Name:**

Megan Livezey

**Owner/Operator Number:**

(360) 957-7157

**Survey Date:**

February 9th 2024

**What is the building's description?**

Residence

**What is this structure's current use?**

Residential

**What is this structure's past use?**

Residential

**Building Square Footage:**

720'

**Number of Floors:**

1

**Area Surveyed:**

Whole House

**Approximate Build Date:**

1969

## **1.0 EXECUTIVE SUMMARY**

Atlas Labs Inc. has performed this work to aid in the demolition of the residence located at 318 S Maple Hill Rd, Kelso, WA 98626. This survey included visual observation, materials sampling and laboratory analyses of materials suspected of containing asbestos. The locations of the suspect materials are noted and documented in this report.

A total of eleven (11) sample sets, eleven (11) total samples were taken during this survey; laboratory procedure will be the separation of multiple layered samples and analysis of individual layers. Eleven (11) material sample sets were collected and delivered to Atlas Labs Inc. Atlas laboratories divided these samples into seventeen (17) separate layers for individual analysis. The samples of suspect asbestos containing materials included: ceiling tile, vinyl tile, mastic, vinyl, insulation, window sealant, sealant, silver paint & tar layer.

Of the eleven (11) asbestos samples taken two (2) of the suspect materials contained asbestos in quantities greater than 1% by weight, the asbestos containing materials are listed in section 4.0 - **Asbestos containing materials were identified during this inspection. (silver paint & tar layer)**

Removal, encapsulation, enclosure, and an Operations and Maintenance (O&M) Program are all recognized alternatives for controlling asbestos containing materials in buildings. Federal OSHA and EPA regulations require removal of most asbestos containing materials from a building prior to demolition or before any planned renovation activities, which may disturb asbestos containing materials. Federal OSHA and EPA regulations require proper handling of lead containing materials in construction. Proper handling of these materials depends greatly on the activities that will impact them.

Atlas Labs Inc. recommends that all asbestos-containing materials identified during this survey that may be affected by the work be removed by a licensed asbestos abatement contractor operating under a technical specification.

## **2.0 GENERAL INFORMATION**

### **2.1 PROJECT INFORMATION**

The structure is located at 318 S Maple Hill Rd, Kelso, WA 98626. The structure is a one level residence built in 1969; construction is of standard stick frame with interior walls of wood. Roofing consists of tar over metal.

### **2.2 PROCEDURES**

The services provided in this phase of work included a visual survey of the building, material sampling, laboratory analysis for the presence of asbestos. The following sections discuss the general procedures employed for each of these tasks.

### **2.2.1 Plan and Specification Review**

A survey to locate asbestos-containing materials is best served by a review of building plans and specifications to determine the type of construction used and the materials specified. No building plans and specifications were provided for review.

### **2.2.2 Walk Through and Visual Survey**

The asbestos identification program began with a walk-through and visual survey of the building. The survey included observation of wall and ceiling finishes, various flooring materials, piping, structural building components, and above-ceiling areas. The primary purpose of the visual survey was to locate and identify friable and non-friable asbestos materials and devise a sampling strategy. "Friable" materials are those that can be crumbled by hand pressure, releasing fibers into the air.

### **2.2.3 Bulk Sampling**

The next phase of the survey was the selection of sampling areas and collection of bulk samples. Material sampling areas were grouped based on material homogeneity. A homogeneous area is one which contains material that seems by texture, color and surface wear to be uniform and applied during the same general time period. To refute the presumption that materials installed prior to 1982 contain asbestos, multiple samples of similar suspect materials were collected to meet the requirements of EPA and OSHA regulations.

Samples were collected from accessible, representative construction materials, which were suspected to contain asbestos. Suspect materials observed and sampled included: ceiling tile, vinyl tile, mastic, vinyl, insulation, window sealant, sealant, silver paint & tar layer.

Samples were labeled, and appropriate chain-of-custody documentation was completed. The samples were sent to Atlas Laboratories in Vancouver, WA for analysis.

### **2.2.4 Analyses of Bulk Samples**

Asbestos samples were analyzed using Polarized Light Microscopy (PLM) coupled with dispersion staining in general accordance with the Environmental Protection Agency's (EPA) "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116, July 1993).

Polarized Light Microscopy is the only analytical method presently used to identify asbestos that employs the optical crystallographic properties of the various crystalline forms in the samples. These properties: refractive indices, birefringence, sign of elongation, and extinction angle, are unique to the individual crystalline forms and therefore is used to identify the different asbestos mineral types: Chrysotile, Amosite, Crocidolite, Anthophyllite, Tremolite, and Actinolite.

The current NESHAP regulations (40 CFR Part 61, dated November 20, 1990) clarify the analytical procedures for determining the percentage of asbestos in bulk samples and



permit the use of visual area estimation. The regulations further indicate the regulated asbestos-containing materials (RACM) – materials that are friable or may become friable, may be further analyzed by point counting when the results indicate less than 10 percent asbestos by visual area estimation. The laboratory utilizes visual area estimation on a routine basis and does not include point counting unless specifically requested.

### **3.0 ALTERNATIVES FOR CONTROLLING ACM**

There are five industry-recognized alternative procedures to control exposure to asbestos-containing materials: (1) removal and disposal; (2) encapsulation; (3) enclosure; (4) repair; and (5) an operations and maintenance (O&M) program. The selection of a particular alternative should be based on the intended usage of the facility, on the condition and location of the asbestos-containing material, and on business considerations.

Atlas Labs Inc. understands that the plan for demolition of this structure is to remove all known asbestos containing materials that are present. Air monitoring and clearance sampling should be done throughout this project to ensure compliance with regulatory requirements and worker safety. Regardless of the alternative chosen, all asbestos-related mitigation activities should be conducted under properly controlled conditions by specially trained personnel. Asbestos removal should be performed by a licensed asbestos abatement contractor operating under the guidelines of strict specifications. All asbestos-containing materials, even when removed in the course of maintenance activities, must be properly disposed of as asbestos containing waste in accordance with all state and federal regulations regarding abatement, transportation and disposal of asbestos containing materials.

#### **3.1 REMOVAL AND DISPOSAL**

Removal of the asbestos-containing material is the only permanent solution to the problem posed by exposure to asbestos fibers. Removal should be seriously considered when the material is extremely friable, badly damaged or when the material is readily accessible to people or staff. The EPA also requires removal before demolition of a facility or before renovation activities, which may disturb the asbestos-containing material. The Occupational Safety and Health Administration (OSHA) have specific requirements addressing the removal of asbestos-containing materials.

#### **3.2 ENCAPSULATION**

Encapsulation of asbestos-containing material is a temporary measure designed to reduce fiber emissions from the material. This alternative is recommended when the asbestos-containing material is in stable, relatively undamaged condition and presents little exposure potential. Encapsulation is considered a temporary measure because the asbestos-containing material still exists in the facility and care must always be taken to avoid disturbing it. The presence and location of the material should be documented and periodic inspections of the encapsulated areas should be made to ensure that no deterioration or damage has occurred.

### **3.3 ENCLOSURE**

Enclosure requires surrounding the asbestos-containing material with an airtight seal or barrier to prevent any fibers released by the material from reaching facility occupants. This method is practical when asbestos-containing materials are difficult, if not impossible, to remove or encapsulate. Again, the location of the materials should be documented, periodic inspections performed, and a record keeping system implemented.

### **3.4 REPAIR**

Repair of asbestos-containing materials is a temporary measure designed to minimize local fiber emissions from the material. Typically, repair is utilized for minimally damaged Thermal System Insulation (TSI) and wall and ceiling materials. Repair should only be used if the repair is technologically feasible and human health and the environment can be protected. Repair is also considered a temporary measure because the asbestos-containing material still remains in the building.

### **3.5 OPERATIONS AND MAINTENANCE PROGRAM**

An Operations and Maintenance (O&M) Program is established to monitor the condition of the asbestos-containing materials and promote safe work practices within the facility. The O&M Program should include notification of the building occupants and workers of the presence and locations of the asbestos-containing materials, training of maintenance personnel in proper cleaning and maintenance procedures, periodic air monitoring in affected areas, and regularly scheduled re-inspections of the asbestos-containing materials. Proper records documenting these efforts must also be maintained.

These recommendations are further elaborated by the EPA in “Managing Asbestos In-Place – A Building Owner’s Guide to Operations and Maintenance Programs for Asbestos-Containing Materials (EPA 20T-2003, July, 1990).

The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 took effect October 1, 1995. This regulation requires building owners/employers to either identify asbestos-containing material by surveying and bulk sampling, or by treating certain building materials as “Presumed Asbestos-Containing Materials (PACM)”. Specifically, all thermal system insulation (TSI) and surfacing materials in buildings constructed prior to 1980 should be considered PACM and resilient flooring materials installed prior to 1980 should be assumed ACM. The presence of ACM or PACM requires the owner/employer to notify employees of the presence, provide training, and follow certain procedures when employees come in contact with such materials.



#### 4.0 QUANTIFICATION TABLE

The following table indicates the approximate quantity of asbestos containing material identified at the Site.

Sample #	Location	Asbestos Containing Material	Asbestos %	Approx. Sq. Footage	Friable Y/N	Condition
11-A Layer 1	Roof	Silver Paint (Silver)	3% Chrysotile	720'	Y	Fair
11-A Layer 2	Roof	Tar Layer (Black)	4% Chrysotile	—	Y	Fair

#### 4.1 Homogenous Materials/Areas

The following table indicates the Homogeneous Materials/Areas.

Sample Set #	Material	Rooms/Areas
N/A	N/A	N/A

## 5.0 QUALIFICATIONS OF THE REPORT

Atlas Labs Inc. has endeavored to investigate the existing conditions within the subject building using standard accepted procedures. The asbestos survey scope of work is intended to identify asbestos-containing materials associated with the subject property. Regardless of the thoroughness of a survey, it is possible that some areas of asbestos-containing materials were overlooked or inaccessible, or are different from those at specific sample locations. Wall voids, building cavities, and mechanical equipment may contain unreported asbestos. In addition, renovation or construction may uncover altered or differing conditions. If a suspect material was not specifically sampled or does not appear to be represented by a similar material previously sampled, it should be analyzed prior to disturbance.

It should be noted that floor tiles and other resinous bound materials, when analyzed by the EPA method for asbestos, may yield false negative results because of limitations in separating closely bound fibers and in detecting fibers of small length and diameter. If a definitive result is required, Atlas Labs Inc. recommends utilizing alternative methods of identification, including Transmission Electron Microscopy (TEM).

This report presents the general descriptions of various construction materials and general locations where these materials were encountered. If questions arise during the planning of demolition, renovation or construction projects concerning the presence of asbestos-containing materials, we should be notified in order to view the conditions and present recommendations.

This report has been prepared on behalf of, and exclusively for the use of Megan Livezey. This report and the findings herein shall not, in whole or in part, be disseminated or conveyed to any other party, or be used or relied upon by any other party, without the consultant's prior written consent by Atlas Labs Inc. **A copy of this survey report must be kept onsite during any remediation, renovation or demolition activities, as required by Southwest Clean Air Agency.**

If you have any questions about this information, please call our office at (360) 852-8936

Survey Performed By: Joel Dillard  
AHERA Building Inspector - Certification: # IN-23-1415C  
Contact Info: Joel@atlaslabinc.com Cell Phone: (360) 949-2984

Sincerely,

*Joel Dillard*



## APPENDIX A



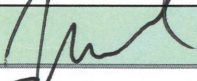

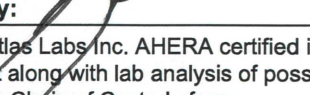
### Full Survey Chain of Custody

Name / Company Name: Megan Livezey		Phone: 360-957-7157	
Contact Email: megster_216@hotmail.com			
Project Name: N/A		Batch: 22-1157401	
Job/Project Address: 318 S Maple Hill Rd, Kelso, WA 98626			
Inspector: Joel Dillard Ph: (360) 949-2984 AHERA Cert. # IN-231415-C Lead RRP Cert. # R-I-41R036-23-00588			
Survey Area Use: Mobile/Manufactured	Approx. Year Built: 1969	Reason for Survey: Demolition	Sq. Ft. 720

<input type="checkbox"/>	Rush	<input checked="" type="checkbox"/>	Asbestos PLM
<input type="checkbox"/>	Next Day	<input type="checkbox"/>	Lead Paint
<input type="checkbox"/>	2-Day	<input type="checkbox"/>	Other
<input checked="" type="checkbox"/>	5-Day		

#	Material Description	Friable Y/N	Location	Condition	Approx. SQ FT.
1-A	Ceiling Tile	Y	Living Room Ceiling	Fair	700'
2-A	Vinyl	Y	Kitchen Floor	Fair	60'
3-A	Vinyl	Y	Living Room Floor	Fair	100'
4-A	Vinyl	Y	Hallway Floor	Fair	60'
5-A	Vinyl	Y	Bedroom 1 Floor	Fair	65'
6-A	Vinyl	Y	Bathroom Floor	Fair	25'
7-A	Insulation	Y	Ceiling	Fair	Unk
8-A	Window Sealant	Y	Exterior Window	Fair	10'
9-A	Sealant	Y	Exterior Siding	Fair	Unk
10-A	Sealant	Y	Exterior Siding	Fair	Unk

Notes:

Inspector Signature: 	Date: 2/9/2024	Time: 2:53 pm
Accepted By: Will Spaldawsky 	Date: 2/9/24	Time: 2:55 pm
Lab Results Completed By: 	Date Sent Out: 2/13/24	(Email) Mail

**Limitations of Inspection:** Atlas Labs Inc. AHERA certified inspector performed a limited survey at the site, date, time and cause as stated above in this document along with lab analysis of possible asbestos and/or lead containing material. Atlas Labs Inc. survey is limited to areas defined on the Chain of Custody form.

**General NESHAPS Bulk Sampling Guidelines:** Material sampling areas were grouped based on homogenous materials. A homogeneous area is one which contains material that seems by texture, color and surface wear to be uniform and applied during the same general time period. Samples are collected based on a visual survey of the work area as defined in this report. Samples were collected from accessible, representative construction materials, which were suspected to contain asbestos. If additional materials are found during the demolition process that were inaccessible at time of inspection that are not listed in this report please test before you cut. Survey is subject to direction from contractor, homeowner or owners agent.



# Atlas Labs

[illegible]



Batch # 2022 \*

22-1157401

Analysis Date \*

02/09/2024

Project #

Name / Company \*

Megan Livezey

Project Name

PO #

Analyst \*

Crossland Kapaun

Project Location \*

318 S Maple Hill Rd., Kelso,  
WA 98626

Turnaround Time \*

5-Day

**Asbestos Analysis of Bulk Material by Polarized Light Microscopy**

Sample*	Layer*	Description*	Non Asbestos*	Asbestos Type*	Asbestos %*
1-A	1	Ceiling Tile (Brown) - Living Room Ceiling	Cellulose	None Present	N/D
2-A	1	Vinyl Tile (Grey) - Kitchen Floor	Cellulose	None Present	N/D
2-A	2	Mastic (Yellow) - Kitchen Floor	Cellulose	None Present	N/D
3-A	1	Vinyl Tile (Brown Wood Tone) - Living Room Floor	Cellulose	None Present	N/D
3-A	2	Mastic (Clear) - Living Room Floor	Cellulose	None Present	N/D
4-A	1	Vinyl (Tan / Grey) - Hallway Floor	Cellulose	None Present	N/D
4-A	2	Mastic (Tan) - Hallway Floor	Cellulose	None Present	N/D
5-A	1	Vinyl (Beige / Brown) - Bedroom 1 Floor	Synthetic	None Present	N/D
5-A	2	Mastic (Brown) - Bedroom 1 Floor	Cellulose	None Present	N/D
6-A	1	Vinyl Tile (Off White) - Bathroom Floor	Cellulose	None Present	N/D
6-A	2	Mastic (Clear) - Bathroom Floor	Cellulose	None Present	N/D
7-A	1	Insulation (Yellow) - Ceiling	Fiberglass	None Present	N/D
8-A	1	Window Sealant (Grey) - Exterior Window	Cellulose	None Present	N/D
9-A	1	Sealant (White) - Exterior Siding	Cellulose	None Present	N/D



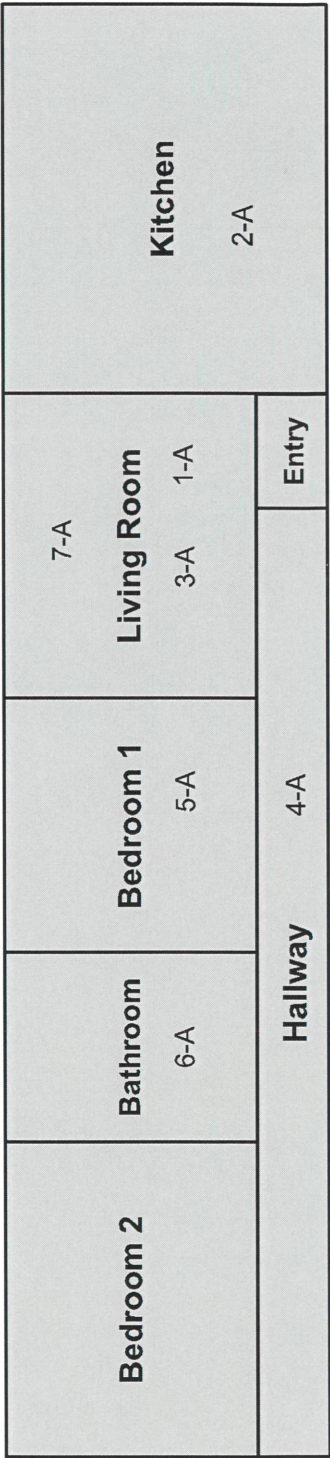
Sample*	Layer*	Description*	Non Asbestos*	Asbestos Type*	Asbestos %*
10-A	1	Sealant (White / Grey) - Exterior Siding	Cellulose	None Present	N/D
11-A	1	Silver Paint (Silver) - Roof	Cellulose	Chrysotile	3%
11-A	2	Tar Layer (Black) - Roof	Cellulose	Chrysotile	4%

**To Be Filled by the Technician**  
Technician \*



Atlas Laboratories maintains liability to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full without written permission by Atlas. Atlas bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval or endorsement by NVLAP, NIST, NIOSH or any other agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore Atlas recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Transmission Electron Microscopy asbestos identification and lead paint analysis will be available and performed by laboratories by proxy. Original analysis documents are available upon request of the client.

## APPENDIX B



318 S Maple Hill Rd, Kelso, WA 98626

Suspect Asbestos Containing Sample Locations





## APPENDIX C

THIS IS TO CERTIFY THAT

**JOEL DILLARD**

**HAS SUCCESSFULLY COMPLETED THE TRAINING COURSE**

**for**

**ASBESTOS INSPECTOR INITIAL COURSE**

In accordance with TSCA Title II, Part 763, Subpart E, Appendix C of 40 CFR

**CCB #SRA0614 24-Hr Training**

24-Hour AHERA Inspector Training; AHERA is the Asbestos Hazard Emergency Response Act enacting Title II of Toxic Substance Control Act (TSCA)

**Expiration Date:** 06/14/2024



Course Date: 6/12/2023 - 6/14/2023

Course Location: Portland, OR

Certificate: IN-23-1415C

For verification of the authenticity of this certificate contact:  
PBS Engineering and Environmental Inc.  
4412 S Corbett Avenue  
Portland, OR 97239  
503.248.1939

A handwritten signature in blue ink, reading 'Andy Fridley'.

Andy Fridley, Instructor