



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 #: 24-168

Amendment: 0

Date Received: 3/18/2024

Date Paid: 3/18/2024

SWCAA Fee: \$369.00

Receipt #: 152978640

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

Quantity to be removed: 276 Square Feet 0 Linear Feet

Workshift days: F

Project starting date: 4/5/2024

Project Completion date: 4/5/2024

Workshift hours: 8:00AM - 4:30PM

Site Name: Concession Building

Site address: 274 22nd Ave

Location of Asbestos: floor and roof

City/State/Zip: Longview

WA

98632

☐ Demolition of Structure (Notification of Demolition required)

County: COWLITZ COUNTY

☒ Asbestos survey conducted?

No survey reason:

AHERA Inspector: Unknown. Bulk Sampling Provided b

Certification #: Non Listed.

### 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 Mastic

### Control Methods:

☐ N.P Enclosure

☐ Glove Bag

☐ Mini Enclosure

☐ Wrap and Cut

☐ Water

☐ HEPA Vac

☒ Other Critical berriers and manual method

Asbestos Contractor: Keystone Contracting, Inc.

Phone: 360-887-0868

Mailing Address: 417 NW 209th St, Ridgefield, WA, 98642

Email: [keystone417@tds.net](mailto:keystone417@tds.net)

Certification ##: ABCN00001024

Supervisor: Martin Ortiz

Phone: 360-353-6423

Property Owner: City of Longview

Phone: 360-442-5299

Mailing Address: 1525 Broadway, Longview WA 98632

Asbestos Disposal Site: Wasco County Landfill: 2550 Steele Rd, The Dalles, OR, 97058-

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

Submitter Name: Kamala Lopez

Representing: Keystone Contracting, Inc

Submitter Title: Office Manager

Date Submitted: 3/18/2024

Reviewed by SWCAA: Danielle Kreps

*Danielle Kreps*

☒ Approved



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Date Received: 3/18/2024

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May 3, 2023

Mrs. Jennifer Wills  
Parks & Recreation  
Parks & Recreation Director  
City of Longview  
2920 Douglas Street  
Longview, WA 98632

Dear Mrs. Wills,

As requested for planned demolition of the Concession Building at Archie Anderson Park located at 275 21st Avenue in Longview, Washington, this letter report serves as a summary of suspect asbestos containing materials that could be impacted even to the extent of full demolition. Additionally, this report identifies other hazardous or regulated materials within the structure that should be removed prior to demolition as well as information on paints applied to the structure.

The Concession Building is a single level approximately 1,050 square feet structure having multiple rooms including a small restroom, shed space, and an open kitchen and food preparation area. The structure is made of a concrete masonry unit (CMU) walls and concrete floors. The ceilings and roof structure are wood framed and plywood. The pitched roof with tar felt between plywood and three-tab roofing.

A "Good Faith" survey was performed with inspection and sampling of all suspect asbestos containing materials (ACM) to be impacted with demolition for laboratory analysis.

## Overview

The inspection, assessment, and sampling were limited to accessible materials, except using destructive means to view inside CMU, but still limited to all destructive means to investigate subsurface areas for hidden suspect materials.

## Asbestos

A total of 10 samples were collected from 4 homogenous materials based on the square footage and type of impacted material. Of the 4 homogenous materials sampled, **two of them contained detectable levels of asbestos**; see results below under "Inspection & Findings". Additionally, though not a building material, a large rolling chalk board was inside the building and is presumed to be asbestos containing material (ACM) and

therefore should not be demolished with the building, see more information below. Materials that contain greater than one percent (1%) asbestos are classified as ACM and therefore are also referred to as regulated asbestos-containing material (RACM). Materials that contain less than one percent (1%) asbestos can still be considered a health concern and therefore federal and state occupational health & safety standards for airborne exposure should be followed.

#### Sampling & Analysis

The sampling method consisted of following a modified EPA AHERA protocol by collecting representative samples based on the type and square footage of each homogeneous material. The samples were collected using a hand tool and a spray bottle to wet the material first to acquire a representative portion of the material being collected. Samples were placed in a sampling bag, marked with a distinct sampling number, and shipped to NVL Laboratories, Inc. under standard chain of custody procedures for analysis. Copies of the laboratory report and chain-of custody documentation are enclosed with this report.

The collected samples were analyzed for asbestos content using polarized-light microscopy (PLM), following the USEPA PLM method EPA-600/R-93/116 for determining asbestos fibers in bulk materials. NVL laboratories, Inc. is accredited for asbestos analysis using PLM and point count analysis by the National Voluntary Laboratory Accreditation Program (NVLAP). See enclosures for certifications and laboratory report.

#### Inspection & Findings

The following homogenous materials were sampled and reported with detectible asbestos greater than 1 percent and therefore are considered ACM or RACM by definition:

- Black mastic associated with former floor tiles, located on the concrete floor of the food preparation and concession serving area. This material is 5-6% chrysotile asbestos. Sample #'s AACB-02-01, AACB-02-02, and AACB-02-03. An abatement contractor should field verify quantities and conditions to be abated prior to providing abatement cost. The estimated quantity is 300 square feet, some items (i.e., cabinets) may be placed over the top of this ACM. Additionally, a paint type coating has been applied on top of this ACM black mastic. See the enclosed Photo Log showing some portions of this ACM.
- Black roof penetration mastic, located at a pipe penetration on the Northeast side of the building on the roof adjacent to the outer edge. The penetration mastic is also adhered to a one (1) foot or less square foot flashing made of lead for the pipe penetration. This material is 5% chrysotile asbestos. Sample # AACB-04-01. An abatement contractor should field verify quantities and conditions to be abated prior to providing abatement cost. The estimated quantity is one square foot or less. See the enclosed Photo Log showing some the lead flashing and this ACM.

The following material type was not sampled or analyzed, instead it was **presumed to be ACM** based on professional & historical knowledge:

- **Black chalk board within a wood frame and rollers to be moved around; a typical school like chalk board that are known to contain asbestos greater than 1% asbestos. This material was presumed considering it is difficult to obtain a sample without cracking the board and it can be reused or donated for reuse. The material is not friable, and the outer black coating protects from exposure to ACM.**

The following homogenous materials sampled were reported as **non-detectible asbestos**, and therefore are not considered ACM or RACM by definition:

- Concrete Masonry Unit (CMU) mortar.
- Exterior Roofing felt.
- Exterior 3-Tab roofing.

#### Applicable Regulations

The homogenous materials sampled did not contain detectible asbestos. However, in the case where materials are found during demolition that are suspected of not being sampled (exceptions are wood, fiberglass insulation, glass, concrete, or metal), the following regulations and guidelines may be applicable, and these materials should be presumed to be ACM/RACM until further sampling is performed for analysis by an AHERA certified building inspector:

- USEPA National Emissions Standard for Hazardous Air Pollutants (NESHAP) (40 CFR 61, Subparts A and M).
- Southwest Clean Air Agency (SWCAA).
- Washington Labor & Industries (L&I).

#### NESHAP / SWCAA Regulations

The USEPA asbestos NESHAP regulations apply to certain demolition and renovation projects in facilities containing ACM. The Southwest Clean Air Agency (SWCAA) enforces these NESHAP regulations in Longview, Washington. SWCAA regulations for asbestos are found in SWCAA-476 and are similar to the federal NESHAP regulations; however, they are more stringent and therefore should be relied upon in Washington. These rules require that all ACM be abated before a building is demolished or impacted in any manner. For projects where friable ACM will be disturbed, these rules may require additional work practices or procedures for the control of emissions. Proper storage, packaging, labeling, and disposal are also addressed.

Both the SWCAA and L&I require notification before a building containing regulated ACM is abated prior to demolition and before certain renovations begin that will impact ACM / RACM.

#### Washington L&I Regulations

Washington Industrial Safety and Health Act regulate employee exposure to asbestos. L&I under the WAC, Chapter 296-62 enforces these rules in the state of Washington.

L&I regulations are found in the Washington Administrative Code (WAC), Chapter 296-65 and 296-62-077. This asbestos standard mandates a permissible exposure limit (PEL) of 0.1 fibers (equal to or longer than 5 micrometers) per cubic centimeter of air (fibers/cc) determined as an 8-hour, time-weighted average (TWA) and an excursion limit of 1 fiber/cc as a 30-minute TWA.

Additionally, for asbestos removal involving ACM, the asbestos standard (WAC 296-62) requires that specific procedures be followed, including enclosure of the work area, to control asbestos exposure of building occupants as well as employees (or contractor) involved in abatement.

## **Lead, Cadmium, and Chromium Containing Paint**

No samples were analyzed for lead, cadmium, and chromium content from paints. In general, painted materials were in good condition with a few exceptions of small, localized areas where the paint had either peeled and was missing, cracking, or bubbling from water leaks. Regardless, considering the analytical minimum reporting limits, even if sampling were performed, it would be prudent to consider at least some detectable levels of these metals, especially cadmium in all painted surfaces. Therefore, regulations and/or policies should be reviewed by qualified personnel for implementation and recommended to perform and prepare a Job Safety Analysis (JSA) document for employer and employees to review and follow. At a minimum, perform planned demolition with dust controls in place or performed as primary engineering controls to reduce or eliminate exposure to those performing the work. Other, measures such as Personal Protective Equipment (PPE) should be evaluated.

### Regulations

- *Washington Labor & Industries (L&I).* Washington Industrial Safety and Health Act regulate employee exposure to air contaminants including lead. L&I under the WAC, Chapter 296-62-07521 enforces the lead rules in the state of Washington. The L&I air contaminant standard mandates an ambient air standard of 0.15ug/m<sup>3</sup>, a permissible exposure limit (PEL) of 50 ug/m<sup>3</sup> averaged over an eight-hour period, and an action level of 30 ug/m<sup>3</sup> also averaged over an eight-hour period. WAC, Chapter 296-62-07521 contains specific requirements to be followed and addresses more lead related topics such as other hazards, notifications, and controls.
- *Washington State Department of Ecology (WADOE) - Dangerous Waste Regulations, WAC, Chapter 173-303.* This chapter addresses requirements regarding waste materials including designating dangerous waste.

## **Other Hazardous or Regulated Materials**

### Inspection & Findings

The following items were identified as either containing hazardous materials or potentially containing hazardous materials or otherwise regulated:

- Light bulbs containing mercury vapor; two in each restroom and two in the maintenance room totaling 18 bulbs.
- Various containerized maintenance/cleaning products and food or drink items; these should be removed prior to demolition.

#### Applicable Regulations

- *Washington Labor & Industries (L&I)*. Washington Industrial Safety and Health Act regulate employee exposure to airborne hazards including contaminants such as chemicals and metals other than lead. L&I under WAC, Chapter 296-841 enforces these rules in the state of Washington.
- *Washington State Department of Ecology (WADOE) - Dangerous Waste Regulations, Chapter 173-303 WAC*. This chapter regulates waste disposal & recycling as well as notifications and cleanup of any spills occurring during demolition or dismantling including oil and hazardous substances. All waste, including demolition material, needs to be “designated” according to the process in Chapter 173-303-070 to determine if it is a dangerous waste, and if so what type.

## **Minimum Requirements**

### *General*

1. Make available a copy of this report to any personnel or contractor performing or bidding on proposed work in, on, or with this Concession structure and associated components to be demolished.

### *Asbestos*

2. SWCAA 476-040(b) states” A summary of the results of the asbestos survey shall be documented and shall either be posted by the property owner or owner’s agent at the work site or communicated in writing to all persons who may come into contact with the materials.”
3. If other suspect asbestos-containing materials (ACM’s) are identified during demolition, please contact the City of Longview’s certified AHERA building inspector (Steve Warner) at (360)957-2720 to inspect and sample the material. If Mr. Warner cannot be contacted, contact the project engineer or other City of Longview representatives. If suspect ACM is disturbed, assume the material contains asbestos; other corrective actions are likely necessary, and a certified asbestos abatement contractor should be notified.

### *Presumed Potential Low Level Regulated Materials in Paint*

4. Personnel or contractors performing work that impact or may be exposed to lead containing paints must perform work in accordance with the applicable regulations identified above in this report under the heading “Lead, Cadmium, and Chromium Containing Paint.

5. Personnel or contractors should have written plans and training as required by L&I-WAC, Chapter 296-62-07521 when working around and with lead containing paints.

*Other Hazardous Materials*

6. The contractor or anyone disposing of fluorescent light tube ballasts should determine if PCBs are present in light fixture ballasts by reading the labels indicating "No PCBs" or research. See the enclosed document under "Miscellaneous" from the EPA entitled "TSCA Disposal Requirements for Fluorescent Light Ballasts."
7. Remove and properly dispose of all identified hazardous or regulated materials including but not limited to light bulbs containing mercury vapor, dangerous waste, and universal waste prior to demolition. Making dangerous waste determinations, profiling to a permitted disposal site, packaging, labeling, manifesting, and transporting should be performed by those with adequate training and experience even if being recycled. Transportation of hazardous materials, dangerous waste, or other regulated waste shall be performed by those who are licensed and certified to accept and transport these materials.

Please call if you have any questions or concerns at extension 5299.

Sincerely,



Steve Warner

EPA AHERA Certified Building Inspector

Enclosure      Laboratory Analytical Report and Chain of Custody  
                    Laboratory Certification  
                    Building Inspector Certification



# **Asbestos Laboratory Analytical Report and Chain of Custody**

April 13, 2023



Steve Warner  
City of Longview Washington  
1525 Broadway PO Box 128  
Longview, WA 98632

**RE: Bulk Asbestos Fiber Analysis; NVL Batch # 2305599.00**

Client Project: Concession Bldg.  
Location: N-A

Dear Mr. Warner,

Enclosed please find test results for the 10 sample(s) submitted to our laboratory for analysis on 4/7/2023.

Examination of these samples was conducted for the presence of identifiable asbestos fibers using polarized light microscopy (PLM) with dispersion staining in accordance with **U. S. EPA 40 CFR Appendix E to Subpart E of Part 763**, Interim Method for the Determination of Asbestos in Bulk Insulation Samples and **EPA 600/R-93/116**, Method for the Determination of Asbestos in Bulk Building Materials.

For samples containing more than one separable layer of materials, the report will include findings for each layer (labeled Layer 1 and Layer 2, etc. for each individual layer). The asbestos concentration in the sample is determined by calibrated visual estimation.

For those samples with asbestos concentrations between 1 and 10 percent based on visual estimation, the EPA recommends a procedure known as point counting (NESHAPS, 40 CFR Part 61). Point counting is a statistically more accurate means of quantification for samples with low concentrations of asbestos.

The detection limit for the calibrated visual estimation is <1%, 400 point counts is 0.25% and 1000 point counts is 0.1%

Samples are archived for two weeks following analysis. Samples that are not retrieved by the client are discarded after two weeks.

Thank you for using our laboratory services. Please do not hesitate to call if there is anything further we can assist you with.

Sincerely,

A handwritten signature in black ink, appearing to read 'Munaf Khan'.

Munaf Khan, Laboratory Director

The logo for NVLAP (National Voluntary Laboratory Accreditation Program). It features the letters 'NVLAP' in a large, stylized, outlined font. Below the letters, the word 'Testing' is written in a smaller, solid font.

Testing

Lab Code: 102063-0

Enc.: Sample Results

**Phone: 206 547.0100 | Fax: 206 634.1936 | Toll Free: 1.888.NVL.LABS (685.5227)**  
**4708 Aurora Avenue North | Seattle, WA 98103-6516**

# Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy



Client: City of Longview Washington  
Address: 1525 Broadway PO Box 128  
Longview, WA 98632

Attention: Mr. Steve Warner  
Project Location: N-A

Batch #: 2305599.00  
Client Project #: Concession Bldg.  
Date Received: 4/7/2023  
Samples Received: 10  
Samples Analyzed: 10  
Method: EPA/600/R-93/116

---

Lab ID: 23034179	Client Sample #: AACB-01-01
Layer 1 of 1	Description: Gray cementitious material
	Non-Fibrous Materials: Binder/Filler, Cementitious particles, Gravel
	Other Fibrous Materials:% None Detected ND
	Asbestos Type: % None Detected ND

---

Lab ID: 23034180	Client Sample #: AACB-01-02
Location: N-A	
Layer 1 of 1	Description: Gray cementitious material with paint
	Non-Fibrous Materials: Binder/Filler, Cementitious particles, Gravel
	Other Fibrous Materials:% None Detected ND
	Asbestos Type: % None Detected ND
	Paint

---

Lab ID: 23034181	Client Sample #: AACB-01-03
Location: N-A	
Layer 1 of 1	Description: Gray cementitious material with paint
	Non-Fibrous Materials: Binder/Filler, Cementitious particles, Paint
	Other Fibrous Materials:% Cellulose <1%
	Asbestos Type: % None Detected ND

---

Lab ID: 23034182	Client Sample #: AACB-02-01
Location: N-A	
Layer 1 of 1	Description: Black soft mastic
	Non-Fibrous Materials: Mastic/Binder
	Other Fibrous Materials:% None Detected ND
	Asbestos Type: % Chrysotile 5%

---

Lab ID: 23034183	Client Sample #: AACB-02-02
Location: N-A	

Sampled by: Client

Analyzed by: Carena Lan

Reviewed by: Munaf Khan

Date: 04/11/2023

Date: 04/13/2023

Munaf Khan, Laboratory Director

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and EPA 40 CFR Appendix E to Subpart E of Part 763 with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government



# Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

Client: City of Longview Washington  
Address: 1525 Broadway PO Box 128  
Longview, WA 98632

Attention: Mr. Steve Warner

Project Location: N-A

Batch #: 2305599.00

Client Project #: Concession Bldg.

Date Received: 4/7/2023

Samples Received: 10

Samples Analyzed: 10

Method: EPA/600/R-93/116

Layer 1 of 1	Description: Black soft mastic	Non-Fibrous Materials: Mastic/Binder	Other Fibrous Materials:% None Detected ND	Asbestos Type: % Chrysotile 6%
Lab ID: 23034184	Client Sample #: AACB-02-03			
Location: N-A				
Layer 1 of 1	Description: Black soft mastic	Non-Fibrous Materials: Mastic/Binder	Other Fibrous Materials:% None Detected ND	Asbestos Type: % Chrysotile 5%
Lab ID: 23034185	Client Sample #: AACB-03-01			
Location: N-A				
Layer 1 of 2	Description: Black asphaltic fibrous material with granules	Non-Fibrous Materials: Asphalt/Binder, Asphaltic Particles, Granules	Other Fibrous Materials:% Glass fibers 43%	Asbestos Type: % None Detected ND
Layer 2 of 2	Description: Black asphaltic fibrous material	Non-Fibrous Materials: Asphalt/Binder, Asphaltic Particles	Other Fibrous Materials:% Cellulose 72%	Asbestos Type: % None Detected ND
Lab ID: 23034186	Client Sample #: AACB-03-02			
Location: N-A				
Layer 1 of 2	Description: Black asphaltic fibrous material with granules	Non-Fibrous Materials: Asphalt/Binder, Asphaltic Particles, Granules	Other Fibrous Materials:% Glass fibers 42%	Asbestos Type: % None Detected ND
Layer 2 of 2	Description: Black asphaltic fibrous material	Non-Fibrous Materials: Asphalt/Binder, Asphaltic Particles	Other Fibrous Materials:% Cellulose 70%	Asbestos Type: % None Detected ND

Sampled by: Client

Analyzed by: Carena Lan

Reviewed by: Munaf Khan

Date: 04/11/2023

Date: 04/13/2023

Munaf Khan, Laboratory Director

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and EPA 40 CFR Appendix E to Subpart E of Part 763 with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government



# Bulk Asbestos Fibers Analysis

By Polarized Light Microscopy

Client: City of Longview Washington  
Address: 1525 Broadway PO Box 128  
Longview, WA 98632

**Attention: Mr. Steve Warner**  
Project Location: N-A

**Batch #: 2305599.00**  
Client Project #: Concession Bldg.  
Date Received: 4/7/2023  
Samples Received: 10  
Samples Analyzed: 10  
Method: EPA/600/R-93/116

---

**Lab ID: 23034187      Client Sample #: AACB-03-03**

Location: N-A

**Layer 1 of 2      Description:** Black asphaltic fibrous material with granules

Non-Fibrous Materials:	Other Fibrous Materials: %
Asphalt/Binder, Asphaltic Particles, Granules	Glass fibers 45%

**Asbestos Type: %**  
**None Detected ND**

**Layer 2 of 2      Description:** Black asphaltic fibrous material

Non-Fibrous Materials:	Other Fibrous Materials: %
Asphalt/Binder, Asphaltic Particles	Cellulose 73%

**Asbestos Type: %**  
**None Detected ND**

---

**Lab ID: 23034188      Client Sample #: AACB-04-01**

Location: N-A

**Layer 1 of 1      Description:** Black soft mastic

Non-Fibrous Materials:	Other Fibrous Materials: %
Mastic/Binder	Cellulose 2%

**Asbestos Type: %**  
**Chrysotile 5%**

**Sampled by:** Client

**Analyzed by:** Carennan Lan

**Reviewed by:** Munaf Khan

**Date:** 04/11/2023

**Date:** 04/13/2023

Munaf Khan, Laboratory Director

Note: If samples are not homogeneous, then subsamples of the components were analyzed separately. All bulk samples are analyzed using both EPA 600/R-93/116 and EPA 40 CFR Appendix E to Subpart E of Part 763 with the following measurement uncertainties for the reported % Asbestos (1%=0-3%, 5%=1-9%, 10%=5-15%, 20%=10-30%, 50%=40-60%). This report relates only to the items tested. If sample was not collected by NVL personnel, then the accuracy of the results is limited by the methodology and acuity of the sample collector. This report shall not be reproduced except in full, without written approval of NVL Laboratories, Inc. It shall not be used to claim product endorsement by NVLAP or any other agency of the US Government

# ASBESTOS LABORATORY SERVICES



**Company** City of Longview Washington  
**Address** 1525 Broadway PO Box 128  
 Longview, WA 98632  
**Project Manager** Mr. Steve Warner  
**Phone** (360) 442-5299  
**Direct** (360) 442-5299

**NVL Batch Number** 2305599.00  
**TAT** 5 Days **AH** No  
**Rush TAT**  
**Due Date** 4/14/2023 **Time** 9:10 AM  
**Email** steve.warner@ci.longview.wa.us  
**Fax** (360) 442-5953

**Project Name/Number:** Concession Bldg. **Project Location:** N-A

**Subcategory** PLM Bulk  
**Item Code** ASB-02 EPA 600/R-93-116 Asbestos by PLM <bulk>

**Total Number of Samples** 10 **Rush Samples**

	Lab ID	Sample ID	Description	A/R
1	23034179	AACB-01-01		A
2	23034180	AACB-01-02		A
3	23034181	AACB-01-03		A
4	23034182	AACB-02-01		A
5	23034183	AACB-02-02		A
6	23034184	AACB-02-03		A
7	23034185	AACB-03-01		A
8	23034186	AACB-03-02		A
9	23034187	AACB-03-03		A
10	23034188	AACB-04-01		A

	Print Name	Signature	Company	Date	Time
<b>Sampled by</b>	Client				
<b>Relinquished by</b>	Federal Express				

Office Use Only	Print Name	Signature	Company	Date	Time
<b>Received by</b>	Kelly AuVu		NVL	4/7/23	910
<b>Analyzed by</b>	Carena Lan		NVL	4/11/23	
<b>Results Called by</b>					
<input type="checkbox"/> Faxed <input type="checkbox"/> Emailed					

**Special Instructions:**

Date: 4/7/2023  
 Time: 12:33 PM  
 Entered By: Kelly AuVu





# ASBESTOS CHAIN OF CUSTODY

## 2305599

- ☐ 1 Hour    ☐ 24 Hours    ☐ 4 Days  
☐ 2 Hours    ☐ 2 Days    ☒ 5 Days  
☐ 4 Hours    ☐ 3 Days    ☐ 10 Days
- Please call for TAT less than 24 Hours

Company City of Longview Project Manager Steve Warner  
Address 1525 Broadway / P.O. Box 128 Cell (360) 957-2720  
Longview, WA 98632 Email steve.warner@ci.longview.wa.us  
Phone 360-442-5299 Fax ( )

Project Name/Number <u>Concession Bldg</u>	Project Location
<input type="checkbox"/> PCM Air (NIOSH 7400) <input type="checkbox"/> TEM (NIOSH 7402) <input type="checkbox"/> TEM (AHERA) <input type="checkbox"/> TEM (EPA Level II Modified) <input checked="" type="checkbox"/> PLM (EPA 600/R-93-116) <input type="checkbox"/> EPA 400 Points (600/R-93-116) <input type="checkbox"/> EPA 1000 Points (600/R-93-116) <input type="checkbox"/> PLM Gravimetry (600/R-93-116) <input type="checkbox"/> Asbestos in Vermiculite (EPA 600/R-04/004) <input type="checkbox"/> Asbestos in Sediment (EPA 1900 Points) <input type="checkbox"/> Asbestos Friable/Non-Friable (EPA 600/R-93/116) <input type="checkbox"/> Other	

### Reporting Instructions

☐ Call ( )    ☐ Fax ( )    ☒ Email steve.warner@ci.longview.wa.us

Total Number of Samples 10

	Sample ID	Description	A/R
1	<u>AA CB-01-01</u>	<u>CMU mortar interior</u>	
2	<u>AA CB-01-02</u>	<u>" "</u>	
3	<u>AA CB-01-03</u>		
4	<u>AA CB-02-01</u>	<u>Black floor mastic</u>	
5	<u>AA CB-02-02</u>	<u>" " "</u>	
6	<u>AA CB-02-03</u>	<u>" " "</u>	
7	<u>AA CB-03-01</u>	<u>Roofing + felt</u>	
8	<u>AA CB-03-02</u>	<u>" " "</u>	
9	<u>AA CB-03-03</u>	<u>" " "</u>	
10	<u>AA CB-04-01</u>	<u>Pen. mastic</u>	
11	<u>AA CB-</u>		
12	<u>AA CB-</u>		
13			
14			
15			

	Print Name	Signature	Company	Date	Time
Sampled by	<u>Steve Warner</u>	<u>Steve Warner</u>	<u>City of LV</u>	<u>4/4/23</u>	<u>1 pm</u>
Relinquish by	<u>Steve Warner</u>	<u>Steve Warner</u>	<u>City of LV</u>	<u>4/4/23</u>	<u>3:50 pm</u>

### Office Use Only

	Print Name	Signature	Company	Date	Time
Received by	<u>Kempfer</u>	<u>e</u>	<u>NVL</u>	<u>4/7/23</u>	<u>9:10 am</u>
Analyzed by					
Called by					
Faxed/Email by					

**Laboratory Certification**



United States Department of Commerce  
National Institute of Standards and Technology



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# Certificate of Accreditation to ISO/IEC 17025:2017

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NVLAP LAB CODE: 102063-0

**NVL Laboratories, Inc.**  
Seattle, WA

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

## Asbestos Fiber Analysis

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

2022-10-01 through 2023-09-30

Effective Dates



A handwritten signature in dark ink, appearing to read "Peter S. Lander".

For the National Voluntary Laboratory Accreditation Program

**SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017**

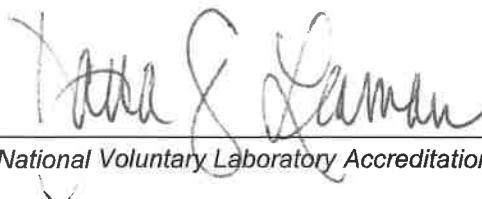
**NVL Laboratories, Inc.**  
4708 Aurora Avenue N.  
Seattle, WA 98103  
Mr. Nghiep Vi Ly  
Phone: 206-547-0100 Fax: 206-634-1936  
Email: [nick.l@nvllabs.com](mailto:nick.l@nvllabs.com)  
<http://www.nvllabs.com>

**ASBESTOS FIBER ANALYSIS**

**NVLAP LAB CODE 102063-0**

**Bulk Asbestos Analysis**

<u><b>Code</b></u>	<u><b>Description</b></u>
18/A01	EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials



*For the National Voluntary Laboratory Accreditation Program*

The State of  
Department  
Washington  
of Ecology



NVL Laboratories, Inc  
Seattle, WA

has complied with provisions set forth in Chapter 173-50 WAC and is hereby recognized by the Department of Ecology as an ACCREDITED LABORATORY for the analytical parameters listed on the accompanying Scope of Accreditation.

This certificate is effective July 18, 2022 and shall expire July 17, 2023.

Witnessed under my hand on July 19, 2022.

*Rebecca Wood*

Rebecca Wood  
Lab Accreditation Unit Supervisor

Laboratory ID  
C797

# WASHINGTON STATE DEPARTMENT OF ECOLOGY

## ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM

### SCOPE OF ACCREDITATION

#### NVL Laboratories, Inc

#### Seattle, WA

is accredited for the analytes listed below using the methods indicated. Full accreditation is granted unless stated otherwise in a note. EPA is the U.S. Environmental Protection Agency. SM is "Standard Methods for the Examination of Water and Wastewater." SM refers to EPA approved method versions. ASTM is the American Society for Testing and Materials. USGS is the U.S. Geological Survey. AOAC is the Association of Official Analytical Chemists. Other references are described in notes.

Matrix/Analyte	Method	Notes
<b>Drinking Water</b>		
Copper	EPA 200.9 Rev 2.2 (1994)	
Lead	EPA 200.9 Rev 2.2 (1994)	
<b>Solid and Chemical Materials</b>		
Arsenic	EPA 6010D_(7/14)	
Barium	EPA 6010D_(7/14)	
Cadmium	EPA 6010D_(7/14)	
Chromium	EPA 6010D_(7/14)	
Copper	EPA 6010D_(7/14)	
Lead	EPA 6010D_(7/14)	
Nickel	EPA 6010D_(7/14)	
Selenium	EPA 6010D_(7/14)	
Silver	EPA 6010D_(7/14)	
Zinc	EPA 6010D_(7/14)	
Mercury	EPA 7471B_(1/98)	
Aroclor-1016 (PCB-1016)	EPA 8082A_(2/07)	
Aroclor-1221 (PCB-1221)	EPA 8082A_(2/07)	
Aroclor-1232 (PCB-1232)	EPA 8082A_(2/07)	
Aroclor-1242 (PCB-1242)	EPA 8082A_(2/07)	
Aroclor-1248 (PCB-1248)	EPA 8082A_(2/07)	
Aroclor-1254 (PCB-1254)	EPA 8082A_(2/07)	
Aroclor-1260 (PCB-1260)	EPA 8082A_(2/07)	
Asbestos	EPA 600/R-93-116	1

NVL Laboratories, Inc

Matrix/Analyte	Method	Notes
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**Accredited Parameter Note Detail**

(1) Accreditation based in part on recognition of US Department of Commerce NIST NVLAP accreditation.



07/19/2022

Authentication Signature

Date

Rebecca Wood, Lab Accreditation Unit Supervisor

## **Building Inspector Certification**

# Certificate of Completion

This is to certify that

**Steve M. Warner**

has satisfactorily completed  
4 hours of online refresher training as an

**AHERA Building Inspector**

to comply with the training requirements of  
TSCA Title II, 40 CFR 763 (AHERA)

EPA Provider # 1085

188627

Certificate Number



Instructor: Andre Zwanenburg

Apr 4, 2023 Expires in 1 year.

Date(s) of Training

Exam Score: NA  
(if applicable)



## **Photo Log**





ARCHIE ANDERSON PARK  
CONCESSION BUILDING  
ASBESTOS & OTHER MATERIALS PHOTOS



Photo shows black penetration mastic (gray oxidized outer surface) located and adhered to a pipe, roof flashing made of lead, and 3-tab roofing. This material contains 5% chrysotile asbestos.





Photo shows black asbestos-containing floor mastic from former floor tile application.  
Note: Much of the black mastic has a paint like coating on top of it as seen in the photo.  
This material contains 5-6% chrysotile asbestos.



Photo shows the same black asbestos-containing floor mastic from a former floor tile application, where it ends just past the chair. Note: Much of this black mastic has a paint like coating on top of it. This material contains 5-6% chrysotile asbestos.



Photo shows four (4) 8 feet long fluorescent light tubes and two fixtures. These tubes and ballast will need to be recycled or disposed of as universal waste. There are a total of eight (8), eight-foot tubes and 8 to 12 light ballast from 4 fixtures. The ballast will need to be checked to determine if they are PCB-containing or not for proper disposal. Check label to see if the ballast indicates Non-PCB Containing.



Photo shows a large chalk board within a rolling frame located inside the Concession building. The black board portion is presumed to be asbestos-containing material (ACM) and should be removed prior to demolition.

## **Miscellaneous**

TSCA Storage Disposal Requirements for Fluorescent Light Ballasts

Location of the PCBs		Storage Requirements (if not at a PCB Commercial Storage Facility)	Labeling, Transportation, & Manifesting for Disposal	Disposal Reference in 40 CFR 761	Disposal Options
Capacitor	Potting Material				
"No PCBs" label		Not regulated for storage or disposal under TSCA			
< 50 ppm	< 50 ppm	Not regulated for storage or disposal under TSCA			
≥ 50 ppm, non-leaking	≥ 50 ppm	761.65(c)(9) for up to 180 days or 761.65(b) for longer	<b>Is regulated as a PCB bulk product waste<sup>1</sup></b> - Manifesting and labeling <sup>4</sup> are required for disposal in accordance with 761.62(a); is not required under 761.62(b); may be required under 761.62(c)	761.50(b)(2)(ii) and 761.62(a), (b), or (c)	- TSCA Incinerator - TSCA/RCRA Landfill - TSCA-Approved Alternative Destruction Method - Decontamination - Coordinated approval - State-approved landfill (leach test required) - Risk-based approval
< 50 ppm	≥ 50 ppm				
≥ 50 ppm, non-leaking	< 50 ppm	not regulated for storage under TSCA <sup>3</sup>	<b>Is regulated as PCB Equipment</b> - No labeling or manifesting required <sup>4</sup>	761.50(b)(2)(i) and 761.60(b)(2)(ii)	As municipal solid waste 40 CFR 761 subpart D options
≥ 50 ppm, leaking	any	761.65(c)(1) for up to 30 days or 761.65(b) for longer	<b>Is regulated as PCB Equipment, but is Regulated as a PCB Bulk Product Waste for Disposal<sup>2</sup></b> - Manifesting and labeling are required for disposal in accordance with 761.62(a); may be required under 761.62(c) <sup>4</sup>	761.50(b)(2) and 761.62(a) or (c)	- TSCA Incinerator - TSCA or RCRA Hazardous Waste Landfill - TSCA-Approved Alternative Destruction Method - Decontamination - Coordinated approval - Risk-based approval

<sup>1</sup> Based on the definition of PCB Bulk Product Waste (761.3)

<sup>2</sup> Based on 761.50(b)(2)

<sup>3</sup> Based on 761.60(b)(7)

<sup>4</sup> Although labeling may not be required, records or optional labeling must show that the waste is less than 1 year old.