ASBESTOS INSPECTION

TEAM MERCHANDISE STORE 420 S. William Street South Bend, Indiana 46601

Project No. 2011-5108

March 9, 2012

Prepared For:

CITY OF SOUTH BEND
COMMUNITY AND ECONOMIC DEVELOPMENT
1200 County-City Building
227 W. Jefferson Blvd.
South Bend, IN 46601

Prepared By:

WIGHTMAN PETRIE 412 S. Lafayette Blvd. South Bend, Indiana 46601



ASBESTOS INSPECTION FOR RENOVATION REPORT OF FINDINGS

March 9, 2012

Report For: City of South Bend

Community and Economic Development

1200 County-City Building 227 W. Jefferson Blvd. South Bend, IN 46601

Attention: Mr. Bill Schalliol, Economic Development Specialist

Subject Site Address:

TEAM MERCHANDISE STORE

420 S. William Street

South Bend, Indiana 46601

Date of Inspection: March 5, 2012

Date of Laboratory Report of Analysis: March 6, 2012

SITE DESCRIPTION

The subject site, which is being renovated as a Team Merchandise Store location for the South Bend Silver Hawks Baseball Team, is located at 420 S. William Street, South Bend, Indiana. The facility, originally constructed in 1901 as a synagogue, was partially renovated during the late 2000s by a private individual that had purchased the property for the purpose of converting the building into a private residence/office. However, with more recent improvements and redevelopment of the area around Coveleski Stadium, the City of South Bend acquired the property for transition to a Team Merchandise Store.

The existing structure consists of a two story, brick structure with stone foundations of approximately 3,825 sq. ft., inclusive of approximately 815 sq. ft. as a basement, and an approximate 415 sq. ft. mezzanine level, accessible by an interior staircase. The facility was constructed with a gable roof with decorative building spires, and elongated, wooden framed windows of approximately 15-ft. in height. A boiler system historically used for heating of the building had previously been removed (prior to ownership by the City of South Bend). Renovations will include the installation of a gas-fired, forced air furnace unit.



ARCHITECTURE GIS CIVIL ENGINEERING LANDSCAPE ARCHITECTURE ENVIRONMENTAL PLANNING RENEWABLE ENERGY LAND SURVEYING

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The interior of the building is rather stripped down as a result of previous incomplete renovations. Interior finishes included ceilings of decorative tin, which was nailed to a wooden lattice and attached to the wooden joists. By all appearances, limited insulation between the wooden joists, was a combination of fiberglass and/or blown-in cellulose. The proposed renovations do not involve disturbance of the existing tin ceilings.

Given that most of the heating and ventilation systems had been previously removed, remaining ventilation delivery systems on the ground level and mezzanine levels consisted of a wire mesh, flexible fiberglass material. One notable exception to this was the presence of "wrapped" ductwork between two flooring supports remaining in the basement. For the most part, plumbing systems/fixtures had been, or were being removed from the structure.

Flooring within the building is wooden or concrete (basement), with the notable exception being two (2) historical rooms (walls removed) within the basement which were 9" x 9" resilient floor tile. Existing walls were a combination of plaster finish (staircase and basement separation wall), and gypsum drywall (more recent renovations to the ground floor). Condition of the plaster varied from extremely poor (cracked and falling with minimal pressure) along the staircase from the ground floor to the mezzanine levels, to areas that remained largely intact within the basement.

Exterior roofing was asphalt-based shingles, for which there was no planned disturbance during renovations. The facility has historically been connected to municipal utilities (water and sanitary sewer).

As part of the environmental due diligence process, the City of South Bend retained the services of Wightman Petrie for performing an asbestos-containing material survey to identify materials containing asbestos which may require abatement prior to the initiating of renovation activities.

SUMMARY OF INSPECTION RESULTS

The following materials were deemed by the analytical laboratory to contain asbestos:

Sample No.	ID No.	Homogeneous Area Description, Sample Description	Category (I or II) ¹	Area/Volume ² , % Asbestos, Location
6.6A	Multiple	9x9 Resilient Floor Tile &	Category I	50 sqft, 3% Chrysotile,
0,0A	Samples	Mastic	Non-Friable	Basement
7,7A	Multiple	White TSI Duct Wrap	N/A Friable	15 Inft, 38-39% Chrysotile,
1,1A	Samples	writte 131 Duct wrap	IN/A FIIADIE	Basement

¹Category I material is defined as asbestos-containing resilient floor covering, asphalt roofing products, packings and gaskets. Asbestos-containing mastic is also considered a Category I material (EPA determination - April 9, 1991). Category II material is defined as all remaining types of non-friable ACM not included in Category I that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable asbestos-cement products such as transite are an example of Category II material.

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² De minimis amounts which trigger the "notification-only" requirements of paragraphs 40 CFR 61.145 (b)(1), (2), (3)(i) and (iv), and (4)(i) through (vii) and (4)(ix) and (xvi) are: RACM Less than 260 linear feet on pipes and less than 160 square feet on other facility components (and less than 35 cubic feet of facility components where the length or area could not be measured previously or there is no asbestos). Indiana requires use of a licensed contractor for removal of friable (or potentially friable) asbestoscontaining materials (ACM) when quantities exceed 3.0 linear feet for Thermal System Insulation (TSI)-wrapped duct, or 3.0 square feet of ACM, or 0.75 cubic feet of ACM.

The following materials were deemed by laboratory analysis to be Non-Asbestos Containing Building Materials:

Sample No.	ID No.	Homogeneous Area Description, Sample Description
1	1202734	Wall Plaster, Northeast Corner
1A	1202735	Wall Plaster, Staircase
1B	1202736	Wall Plaster, 2 nd Floor
1D	1202737	Wall Plaster, Basement
2	1202738	Drywall, West Wall
2A	1202739	Drywall, West Wall
3	1202740	Cotton Insulation, West Wall
4	1202741	Brown Insulation, 2 nd Floor
4A	1202742	Brown Insulation, 2 nd Floor
5	1202743	Asphalt Roofing, East Exterior
5A	1202744	Lower Asphalt Roofing, East Exterior
8	1202749	Black Tar, Basement
9	1202750	Fireboard, Basement
9A	1202751	Fireboard, Basement
10	1202752	Floor Cover, Basement

Locations for each sample can be found in the attached Figures.

CONCLUSIONS AND RECOMMENDATIONS

Wightman Petrie was retained by the City of South Bend to perform an asbestos inspection prior to the renovation of the former synagogue structure being converted to a Team Merchandise Store for the South Bend Silver Hawks Baseball Team, located at 420 S. William Street, in South Bend, Indiana. It has been confirmed that Asbestos-Containing Material (ACM) is present based upon the results of our inspection, and the review of the analytical data for samples collected throughout the building in the form of friable thermal system insulation (TSI) wrap, resilient floor tile, and floor tile mastic used as an adhesive for floor tile. Asbestos is present in these materials in a quantity greater than 1%, the established Action Level by the State of Indiana.

By regulation, Category I Non-friable ACM is any asbestos-containing packing, gasket, resilient floor covering or asphalt roofing product which contains more than one percent (1%) asbestos as determined using polarized light microscopy (PLM) according to the method specified in Appendix A, Subpart F, 40 CFR Part 763. (Sec. 61.141). Category I Non-friable ACM must be inspected and tested for friability if it is in poor condition before demolition/renovation to determine whether or not it is subject to the Asbestos NESHAP.

A licensed abatement contractor is not required to remove Category 1, Non-friable Materials that will not become friable during the renovation process. Actions involving the sanding, grinding, cutting or abrading any material deemed to be Category I, Non-Friable material will in fact result in a condition that will cause the emission of asbestos



fibers. As such, the sanding, grinding, cutting, or abrading of materials identified as Category I Asbestos-Containing Material should be expressly prohibited.

Friable asbestos containing materials (easily crushed by moderate hand pressure), such as TSI wrap, require that a licensed asbestos abatement contractor be retained in order to remove (abate) such materials that will be disturbed as a result of any renovation activities. Furthermore, even friable materials that are not scheduled for removal/abatement due to proposed renovation activities should be considered for removal/abatement if not in good condition or damaged.

Notification is required. Notification to the Indiana Department of Environmental Management (IDEM) is accomplished by submitting Form 44593 (IDEM Notification of Demolition and Renovation Operations). A copy of Form 44593 is included with this report. The report must be filed with the IDEM, Office of Air Quality (OAQ) Compliance Branch:

IDEM, OAQ Compliance Branch 100 N. Senate Ave. Mail Code 61-53 IGCN 1003 Indianapolis, IN 46204-2251

Form 44593 may be submitted by fax to 317-233-6865. IDEM's contact for these notices is Mr. John Clevenger, Environmental Manager. His telephone number is 317-233-6880. His e-mail address is jcleveng@idem.in.gov.

A licensed contractor is required to remove friable TSI. Licensed contractors must follow the procedures as described in 61.145(c) "Procedures for asbestos emission control," beginning with subsection (4):

- (4) After a facility component covered with, coated with, or containing RACM³ has been taken out of the facility as a unit or in sections pursuant to paragraph (c)(2) of this section⁴, it shall be stripped or contained in leak-tight wrapping, except as described in paragraph (c)(5) of this section. If stripped, either:
 - (i) Adequately wet the RACM during stripping; or
 - (ii) Use a local exhaust ventilation and collection system designed and operated to capture the particulate asbestos material produced by the stripping. The system must exhibit no visible emissions to the outside air or be designed and operated in accordance with the requirements in 61.152.

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³ Regulated asbestos-containing material (RACM) means

⁽a) Friable asbestos material,

⁽b) Category I non-friable ACM that has become friable,

⁽c) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or

⁽d) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

⁴ (c)(2) When a facility component that contains, is covered with, or is coated with RACM is being taken out of the facility as a unit or in sections: (i) Adequately wet all RACM exposed during cutting or disjoining operations; and (ii) Carefully lower each unit or section to the floor and to ground level, not dropping, throwing, sliding, or otherwise damaging or disturbing the RACM.

- (5) For large facility components such as reactor vessels, large tanks, and steam generators, but not beams (which must be handled in accordance with paragraphs (c)(2), (3), and (4) of this section), the RACM is not required to be stripped if the following requirements are met:
 - (i) The component is removed, transported, stored, disposed of, or reused without disturbing or damaging the RACM.
 - (ii) The component is encased in a leak-tight wrapping.
 - (iii) The leak-tight wrapping is labeled according to 61.149 (d)(1)(i), (ii), and (iii) during all loading and unloading operations and during storage.
- (6) For all RACM, including material that has been removed or stripped:
 - (i) Adequately wet the material and ensure that it remains wet until collected and contained or treated in preparation for disposal in accordance with 61.150; and
 - (ii) Carefully lower the material to the ground and floor, not dropping, throwing, sliding, or otherwise damaging or disturbing the material.
 - (iii) Transport the material to the ground via leak-tight chutes or containers if it has been removed or stripped more than 50 feet above ground level and was not removed as units or in sections.
 - (iv) RACM contained in leak-tight wrapping that has been removed in accordance with paragraphs (c)(4) and (c)(3)(i)(B)(3) of this section need not be wetted.
- (7) When the temperature at the point of wetting is below 0 °C (32 °F):
 - (i) The owner or operator need not comply with paragraph (c)(2)(i) and the wetting provisions of paragraph (c)(3) of this section.
 - (ii) The owner or operator shall remove facility components containing, coated with, or covered with RACM as units or in sections to the maximum extent possible.
 - (iii) During periods when wetting operations are suspended due to freezing temperatures, the owner or operator must record the temperature in the area containing the facility components at the beginning, middle, and end of each workday and keep daily temperature records available for inspection by the Administrator during normal business hours at the demolition or renovation site. The owner or operator shall retain the temperature records for at least 2 years.
- (8) Effective 1 year after promulgation of this regulation, no RACM shall be stripped, removed, or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management-level person or other authorized representative, trained in the provisions of this regulation and the means of complying with them, is present. Every 2 years, the trained on-site individual shall receive refresher training in the provisions of this regulation. The required training shall include as a minimum: applicability; notifications; material identification; control procedures for removals including, at least, wetting, local exhaust ventilation, negative pressure enclosures, glove-bag procedures, and High Efficiency Particulate Air (HEPA) filters; waste disposal work practices; reporting and recordkeeping; and asbestos hazards and worker protection. Evidence that the required training has been completed shall be posted and made available for inspection by the Administrator at the demolition or renovation site.



(9) For facilities described in paragraph (a)(3) of this section⁵, adequately wet the portion of the facility that contains RACM during the wrecking operation.

Disposal requirements for asbestos. Disposal of asbestos from demolition/renovation sites is regulated by 40 CFR 61.150 (Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations). The text of Section 150 follows:

Each owner or operator of any source covered under the provisions of 61.144, 61.145, 61.146, and 61.147 shall comply with the following provisions:

- (a) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (a) (1) through (4) of this section.
 - (1) Adequately wet asbestos-containing waste material as follows:
 - (i) Mix control device asbestos waste to form a slurry; adequately wet other asbestos-containing waste material; and
 - (ii) Discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations, or use the methods specified by 61.152 to clean emissions containing particulate asbestos material before they escape to, or are vented to, the outside air; and
 - (iii) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and
 - (iv) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001 (j)(2) or 1926.58 (k)(2)(iii). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.
 - (v) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.
 - (2) Process asbestos-containing waste material into non-friable forms as follows:
 - (i) Form all asbestos-containing waste material into non-friable pellets or other shapes;
 - (ii) Discharge no visible emissions to the outside air from collection and processing operations, including incineration, or use the method specified by 61.152 to clean emissions containing particulate asbestos material before they escape to, or is vented to, the outside air.
 - (3) For facilities demolished where the RACM is not removed prior to demolition according to 61.145 (c)(1) (i), (ii), (iii), and (iv) or for facilities demolished according to 61.145 (c)(9), adequately wet asbestos containing waste material at all times after demolition and keep wet during handling and loading for transport to a disposal site. Asbestos-containing waste materials covered by this paragraph do not have to be sealed in leak-tight containers or wrapping but may be transported and disposed of in bulk.



⁵ (a)(3) refers to emergency demolitions ordered by municipalities.

- (4) Use an alternative emission control and waste treatment method that has received prior approval by the Administrator according to the procedure described in 61.149 (c)(2).
- (5) As applied to demolition and renovation, the requirements of paragraph (a) of this section do not apply to Category I non-friable ACM waste and Category II non-friable ACM waste that did not become crumbled, pulverized, or reduced to powder.
- (b) All asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:
 - (1) A waste disposal site operated in accordance with the provisions of 61.154, or
 - (2) An EPA-approved site that converts RACM and asbestos-containing waste material into non-asbestos (asbestos-free) material according to the provisions of 61.155.
 - (3) The requirements of paragraph (b) of this section do not apply to Category I non-friable ACM that is not RACM.
- (c) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of 61.149 (d)(1) (i), (ii), and (iii).
- (d) For all asbestos-containing waste material transported off the facility site:
 - (1) Maintain waste shipment records, using a form similar to that shown in Figure 4, and include the following information:
 - (i) The name, address, and telephone number of the waste generator.
 - (ii) The name and address of the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program.
 - (iii) The approximate quantity in cubic meters (cubic yards).
 - (iv) The name and telephone number of the disposal site operator.
 - (v) The name and physical site location of the disposal site.
 - (vi) The date transported.
 - (vii) The name, address, and telephone number of the transporter(s).
 - (viii) A certification that the contents of this consignment are fully and accurately described by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and government regulations.
 - (2) Provide a copy of the waste shipment record, described in paragraph (d)(1) of this section, to the disposal site owners or operators at the same time as the asbestoscontaining waste material is delivered to the disposal site.
 - (3) For waste shipments where a copy of the waste shipment record, signed by the owner or operator of the designated disposal site, is not received by the waste generator within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated disposal site to determine the status of the waste shipment.
 - (4) Report in writing to the local, State, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator if a copy of the waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the waste generator within 45 days of the date the waste was accepted by the initial transporter. Include in the report the following information:
 - (i) A copy of the waste shipment record for which a confirmation of delivery was not received, and
 - (ii) A cover letter signed by the waste generator explaining the efforts taken to locate the asbestos waste shipment and the results of those efforts.



- (5) Retain a copy of all waste shipment records, including a copy of the waste shipment record signed by the owner or operator of the designated waste disposal site, for at least 2 years.
- (e) Furnish upon request, and make available for inspection by the Administrator, all records required under this section.

1.0 BACKGROUND

Wightman Petrie was retained by the City of South Bend to perform an asbestos survey within the former synagogue being renovated as a Team Merchandise Store for the South Bend Silver Hawks Baseball Team. The building is located at 420 S. William Street, in an area that is a combination of residential, commercial and recreational oriented (Coveleski Stadium and associated parking facilities).

Wightman Petrie conducted the asbestos survey on March 5, 2012. The investigator for this project was Mr. Andrew Soens, who holds a license issued by the State of Indiana, Department of Environmental Management.

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License No: 19A004060 Profession: Asbestos

License Type: Asbestos Inspector

Obtained By Method: Application
Issue Date: July 14, 2011
Expiration Date: July 14, 2012

License Status: Active

2.0 FIELD PROCEDURES AND ANALYSIS METHODOLOGY

Guidelines used for the inspection were based upon those established by the Environmental Protection Agency (EPA) in the Guidance for Controlling Asbestos Containing Materials in Buildings, Office of Pesticides and Toxic Substances, DOC #560/5-85-024 and 40 CFR Part 763, Asbestos Hazard Emergency Response Act (AHERA), and by 40 CFR, § 61.145 (National Emission Standard for Hazardous Air Pollutants, Asbestos, Standard for Demolition and Renovation).

Field information was organized as per the AHERA concept of Homogeneous Area (HA). An HA is defined as a suspect material of similar age, appearance, function and texture. Each material represents a specific HA, sampled and then assessed for condition. Bulk samples of suspect ACMs were analyzed by Polarized Light Microscopy (PLM) with dispersion staining, as described in 40 CFR Part 763 and the National Emissions Standard for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M.

3.0 SCOPE OF WORK

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The entire building including areas both interior and exterior were inspected for ACM. The inspection was characterized by a close visual inspection of all accessible areas.



Materials examined included:

- 1. Surfacing Materials (ceilings, interior and exterior walls and their backing materials, multiple roofing materials)
- 2. Insulating Materials
- 3. Miscellaneous Materials (for friability)

4.0 SUMMARY OF FILE SEARCH

No file search was conducted for this Asbestos Inspection.

5.0 INSPECTION RESULTS

The asbestos inspection involved a thorough visual examination of all areas, and subsequent sampling of suspect materials. ACM Engineering and Environmental Services, certified by the National Voluntary Laboratory Accreditation Program (NVLAP Lab Code 101977), performed analysis of bulk samples collected during the inspection using Polarized Light Microscopy (PLM) and the central stop dispersion testing method. The results are summarized on pages 2 through 3 of this report.

6.0 ASBESTOS QUANTITY SCHEDULE

Results of the survey and subsequent analysis of bulk samples by the laboratory indicate that Asbestos-Containing Material (ACM) is present in the structure to be renovated, and that asbestos is present in the identified materials in a quantity greater than 1%, the established Action Level by the State of Indiana. The materials have been identified as TSI wrap, totaling approximately 15 linear feet of wrapped duct work between the floor joists present within the basement of the structure. Floor tile and mastic, totaling approximately 50 square feet, has been found in the basement.

The resilient floor tile is classified as Category 1, Non-friable Asbestos Containing Materials. Category I Non-friable ACM is any asbestos-containing packing, gasket, resilient floor covering or asphalt roofing product which contains more than one percent (1%) asbestos as determined using polarized light microscopy (PLM) according to the method specified in Appendix A, Subpart F, 40 CFR Part 763. (Sec. 61.141). Category I Non-friable ACM must be inspected and tested for friability if it is in poor condition before demolition to determine whether or not it is subject to the Asbestos NESHAP.

A licensed abatement contractor is required to remove all friable asbestos- containing materials, such as TSI wrap located in the basement and on the first floor. A licensed abatement contractor is not required to remove Category 1, Non-friable Materials such as floor tile and asphalt roofing materials that will not become friable during the demolition/renovation process. However, please note that based on the general condition of the floor tile (poor); it is recommended that the selected licensed, asbestos abatement contractor proceed with removal as part of an abatement action.

7.0 **AREAS NOT ACCESSIBLE**

Wightman Petrie inspected and sampled materials which were observable and accessible to the survey team. Suspect ACMs that have not been sampled, tested and found negative for asbestos (if any) must be assumed ACM until, and unless, they are tested.

The term "suspect ACM" would include materials discovered in the course of demolition/renovation which only become visible during renovation. One example is Thermal System Insulation (TSI) which may be found on vertical duct runs through walls or above the dropped ceiling. These TSI materials may become visible only after the wall or foundation has been removed. If such materials are discovered during renovation, renovation should be halted immediately, and we should be contacted so that we may sample the suspect ACM in question.

The asphalt roofing materials present on a small protruding section of the ground floor of the building (east side) were tested and noted as negative. Other areas, covered with asphalt shingles similar to those of the area targeted for demolition, were not tested and are not scheduled for disturbance as part of the renovation activity.

8.0 REPORT CERTIFICATION

Wightman Petrie certifies that the information contained herein is based on the physical and visual inspections conducted by Andrew Soens of Wightman Petrie, Inc. and data collected during the inspection survey.

Conley B. Phifer III

Environmental Department Manager Asbestos Inspector

Asbestos License 19A002353

Andrew J. Soens

Asbestos License 19A004060

LIST OF ATTACHMENTS:

A – Site Drawing, including Sample Locations

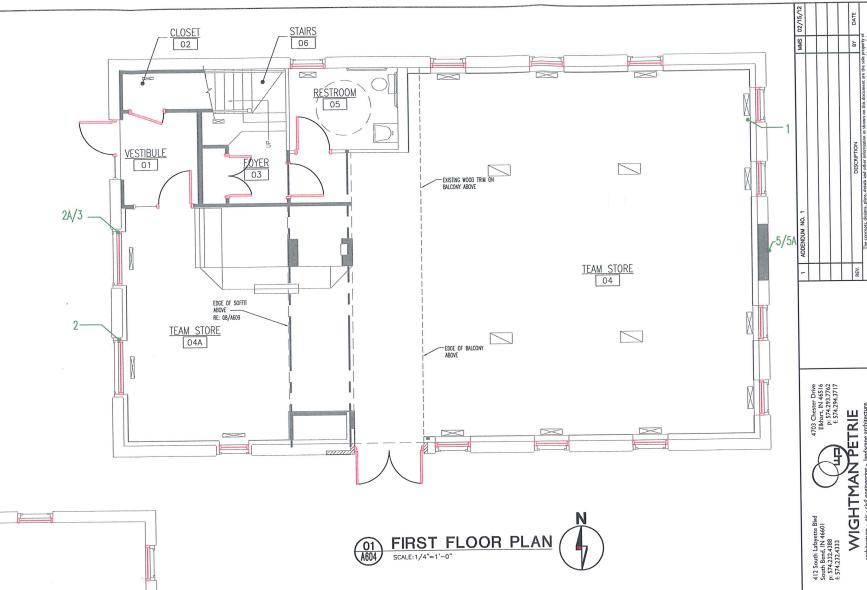
B – Analytical Datasheets/Chain of Custody

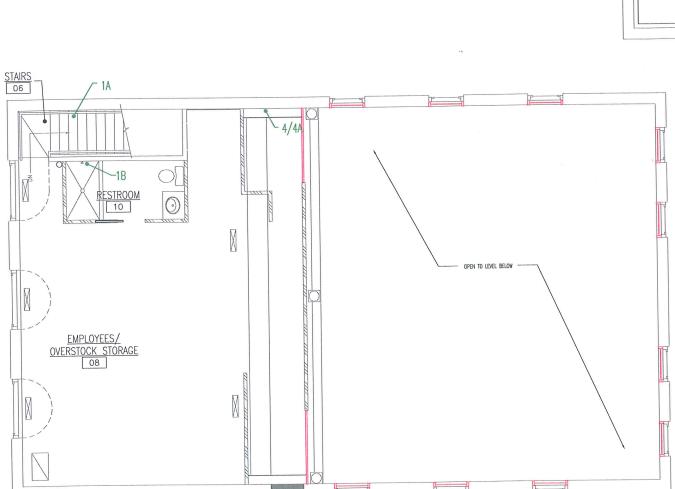
C – IDEM Form 44593

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ASBESTOS LEGEND

COTTON INSULATION BROWN COTTON INSULATION ASPHALT ROOF

PLASTER DRYWALL

9X9 TILE TSI WHITE

BLACK TAR FIRE BOARD

FLOOR COVER

10



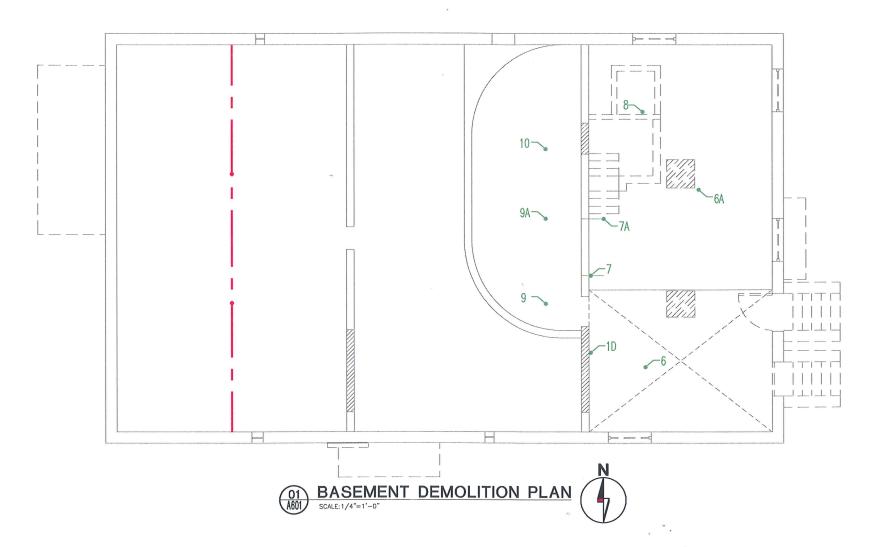
COVELESKI STADIUM RENOVATIONS SWING - BATTER - SWING LLC
JTH STREET
SOUTH BEND, INDI
TEAM STORE - RIST & SECOND FLOOR PLANS
ASBESTOS SAMPLES STEVE LACLUYSE RAWN BY: MMS, TDK, DC FEBRUARY 2012 OB NUMBER: 2011-5108

AS NOTED

FIGURE I

ASBESTOS LEGEND

- PLASTER
 DRYWALL
 COTTON INSULATION
 BROWN COTTON INSULATION
- ASPHALT ROOF
- 9X9 TILE
- TSI WHITE BLACK TAR
- 9 FIRE BOARD 10 FLOOR COVER



4703 Chester Drive Elkhart, IN 46516 p: 574.293.7762 f: 574.294.3717 ETRIE dscape architecture

COVELESKI STADIUM RENOVATIONS

SWING - BATTER - SWING LLC
W. SOUTH STREET
TEAM STORE - BASEMENT ASBESTOS SAMPLE LOCATIONS

STEVE LACLUYSE

RAWN BY: MMS, TDK, DC FEBRUARY 2012

B NUMBER: 2011-5108 AS SHOWN

A601

Analytical Data/Chain of Custody

ANALYSIS OF SUSPECT ASBESTOS CONTAINING BUILDING MATERIALS

FOR:

WIGHTMAN PETRIE 412 SOUTH LAFAYETTE SOUTH BEND, IN 46601

LOCATION:

COVE SYNAGOGUE

ACM ENGINEERING & ENVIRONMENTAL SERVICES PROJECT#: 18570

DATE OF REPORT:

MARCH 6, 2012

PREPARED BY:

ACM ENGINEERING & ENVIRONMENTAL SERVICES
26598 U.S. 20 WEST
SOUTH BEND, IN 46628

NVLAP LAB CODE: 101977

INTRODUCTION:

In March 2012, ACM Engineering & Environmental Services received bulk samples of suspect asbestos containing building material from Wightman Petrie. These are to be analyzed by ACM Engineering & Environmental Services for possible asbestos content.

THE REPORT:

The attached report quantifies the fibrous materials found in each sample submitted for analysis. A complete fibrous analysis of samples is given for each sample followed by a breakdown analysis of any sub-samples for heterogeneous material.

The first column is the client sample identification.

The second column is the laboratory sample number. The laboratory number for the overall sample analysis is a digit number. The laboratory number followed by a letter designation (A,B,C. etc.) indicates a sub-sample analysis.

The third column is the sample identification, which indicates whether the sample is homogeneous or heterogeneous, the color of the sample, and the physical description (cementitious, fibrous, cloth, etc.)

The fourth column indicates the types and percentages of asbestos identified in the sample or sub-sample.

The fifth column indicates the types and percentages of non-asbestos identified in the sample or sub-sample.

The sixth column indicates the types and percentages of non-asbestos, non-fibrous material in the sample or sub-sample.

The seventh column indicates the types and percentages of non-asbestos fibrous material in the sample or sub-sample. Fibrous material will not necessarily total 100% of the sample.

There will be dashes (----) in each column when nothing is detected.

METHOD:

All analyses and quantifications are performed in accordance with the U.S. Environmental Protection Agency's "Method for the Determination of Asbestos in Bulk Building Materials", EPA/600/R-93/116.

The method utilizes stereoscopical examination of the bulk samples, as well as utilizing the polarized light microscope and the central stop dispersion staining method.

If applicable, please be advised that the Stereo Scope/PLM methods have limitations regarding floor tile analysis for asbestos content. Historically, the production of floor tile has included the grinding of asbestos into submicroscopic portions. Therefore, this method of analysis may produce incorrect results for tests of floor tile which produce negative finding for asbestos.

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Gross samples are examined under a 10X or 20X stereoscope where homogeneity (need for sub-samples), texture and /or any other distinguishing characteristics are determined.

Sub-samples are prepared if needed. Any fibrous material is mounted in high dispersion oil for further microscope examination utilizing polarized light microscopy. Any possible asbestos fibers are analyzed for morphology, color and pleochroism, index of refraction parallel and perpendicular to elongation, birefringence, extinction characteristic and sign of elongation, and any other distinguishing characteristics observed.

To determine the refractive index, the central stop dispersion staining method is used, as well as matching with refractive index oil and using light matching the sodium D line wavelength. Identification of non-asbestos species is less rigorous, as they are of secondary interest.

The percentage of asbestos and other fibrous materials are then determined according to sample area coverage and thickness. The limit of qualification is one percent (1%). The above is recorded on the laboratory analysis sheet and maintained for three years.

The error involved for reported percentages of fibrous is 100% error for 1% to 5%, 50% error for 5% to 20%, and 25% error for 20% to 100%. All percentages will be reported in a range indicating error or a single value, in which case the above error should be applied. When the value 1% or greater is reported this indicates asbestos is present in the sample.

ASBESTOS CHARACTERIZATION:

The features of the various forms of asbestos are as follows:

CHRYSOTILE: Thin fibers and fiber bundles with both straight and wavy sections. The ends of bundles tend to be frayed. Sign of elongation is positive, refractive indices are 1.493-1.560 (alpha) and 1.668-1.717 (gamma), and birefringence of 0.009-0.016. It is commonly referred to as white asbestos.

AMOSITE: Straight thin single fibers and bundles of such fibers usually with cleanly broken ends on individual fibers, positive sign of elongation, refractive indices of 1.653-1.696 (alpha) and 1.655-1.729 (gamma), and birefringence of 0.020-0.033. Fibers exhibit parallel extinction.

CROCIDOLITE: Similar in morphology to amosite, but is distinguished by negative sign of elongation, blue to blue-green pleochroic coloration, refractive indices of 1.654-1.701 (alpha) and 1.668-1.717 (gamma), and birefringence of 0.009-0.016. It is commonly referred to as blue asbestos.

ANTHOPHYLITE: Similar in morphology to amosite, but has refractive indices of 1.596-1.652 (alpha) and 1.615-1.676 (gamma), anthophylite fibers show parallel extinction and positive sign of elongation.

PAGE 3

TREMOLITE/ACTINOLITE SERIES:

Transparent, elongated furrowed prisms, usually with uneven, jagged ends and smooth sides, with oblique (0-20 degree) to parallel extinction and positive elongation; refractive indices are 1.599-1.668 (alpha) and 1.622-1.688 (gamma) and birefringence is 0.020-0.028.

SAMPLE RETENTION:

Samples will be retained for 6 months unless otherwise instructed. After this period, the sample(s) will be disposed of appropriately. Upon written request, the samples will be returned by mail or delivery for a nominal fee to cover postage and handling. There would be no charge for samples picked-up at ACM Engineering & Environmental Services.

DISCUSSION AND RECOMMENDATIONS:

In order to reduce the risk of introducing asbestos fibers into the air, care should be taken not to disturb the asbestos containing building materials. If renovation, demolition or other activities might disturb known asbestos containing building materials, a reputable asbestos consultant should be contacted to help effectively design and implement an asbestos management program.

Report prepared by:

Patrick T. Griffin

-

ACM Engineering & Environmental Services President/CEO

Analysis of Suspect Asbestos Containing Building Materials

CLIENT:

WIGHTMAN PETRIE

412 SOUTH LAFAYETTE

ANALYTICAL METHOD: EPA/600/R-93/116

SOUTH BEND, IN 46601

NVLAP LAB CODE #: 101977

CLIENT PROJECT:

COVE SYNAGOGUE

MATRIX: BULK

DATE OF SAMPLE:

03/05/12

DATE OF ANALYSIS:

03/06/12

SAMPLE SITE:

COVE SYNAGOGUE

ACM PROJECT #:

18570

CLIENT SAMPLE NUMBER	LAB SAMPLE NUMBER	SAMPLE IDENTIFICATION	ASBEST	CELL	NON FIB NON ACBM	FIB NON ACBM
1	1202734	PLASTER		1%	99%	
1A	1202735	PLASTER		2%	94%	4% G
1B	1202736	PLASTER		1%	99%	
1D	1202737	PLASTER		1%	99%	
2	1202738	DRYWALL		4%	92%	4% G
2A	1202739	DRYWALL		11%	86%	3% G
3	1202740	INSULATION			1%	99% G
4	1202741	BROWN INSULATION		92%	2%	6% G
4A	1202742	BROWN INSULATION		93%	1%	6% G
5	1202743	ASPHALT ROOFING		6%	63%	31% G
5A	1202744	LOWER ASPHALT ROOFING		49%	51%	
6	1202745	9X9 FLOOR TILE	3% C		97%	
6	1202745A	BLACK MASTIC	3% C	3%	94%	
6	1202746	9X9 FLOOR TILE	3% C		97%	
6A	1202746A	BLACK MASTIC	2% C	4%	94%	
7	1202747	WHITE TSI	38% C	58%	4%	
7A	1202748	WHITE TSI	39% C	58%	3%	
8	1202749	BLACK TAR		2%	98%	
9	1202750	FIRE BOARD	=====	93%	7%	
9A	1202751	FIRE BOARD		32%	68%	
10	1202752	FLOOR COVER	an. no no m	8%	90%	2% G

ACM RECOMMENDS POINT COUNTING ANALYSIS ON ALL BULK SAMPLES

MICROSCOPIST:

with less than 10% (< 10%) ASBESTOS CONTENT

ACM ENGINEERING & ENVIRONMENTAL SERVICES 26598 US 20 WEST, SOUTH BEND, INDIANA 46628 TELEPHONE (574) 234-8435 FAX (574) 234-6800

Analysis of Suspect Asbestos Containing Materials

ACM ENGINEERING & ENVIRONMENTAL SERVICES PROJECT NO.: 18570

DESCRIPTION OF ANY PROBLEMS ENCOUNTERED IN THE SAMPLE ANALYSIS: None

COMPONENTS DESCRIPTION:

ASBESTOS MATERIALS

ACBM = ASBESTOS CONTAINING BUILDING MATERIAL

C = CHRYSOTILE

A = AMOSITE

CR = CROCIDOLITE AN = ANTHOPHYLITE

AC = ACTINOLITE T = TREMOLITE

---- = NO ASBESTOS DETECTED

NON-ASBESTOS MATERIALS

CELL = CELLULOSE

G = FIBROUS GLASS M = MINERAL WOOL

S = SYNTHETICS

H = HAIRCO = COTTON

O = OTHER

CF = CERAMIC FIBERS

V = VERMICULITE

N = NYLON

NON-FIB NON-ACM = NON FIBROUS NON ACBM

FIB NON ACM = FIBROUS NON ACBM

NOTES:

FIBROUS QUANTITIES DO NOT NECESSARILY ADD UP TO 100%, REMAINING QUANTITIES ARE COMPOSED OF NON-FIBROUS ROCKS, BINDERS AND MISC. MATERIALS.

THIS REPORT MUST NOT BE USED BY THE CLIENT TO CLAIM PRODUCT ENDORSEMENT BY NVLAP OR ANY AGENCY OF THE U.S. GOVERNMENT.

THIS REPORT RELATES ONLY TO THE ITEMS ABOVE.

THIS TEST REPORT MUST NOT BE REPRODUCED EXCEPT IN FULL WITHOUT THE WRITTEN CONSENT OF ACM ENGINEERING & ENVIRONMENTAL SERVICES.

ACM ENGINEERING & ENVIRONMENTAL SERVICES DOES NOT DEVIATE FROM THE TEST METHOD DESCRIBED IN THIS REPORT.

ACM Engineering & Environmental Services, Inc.

26598 US 20 West

South Bend, Indiana 46628 Phone (574) 234-8435

Fax (574) 234-6800

Client;

Wightman

Billing Address:

Billing City, State, Zip: _

Sampled By: Report Results To: $oldsymbol{C}$ Sampling Date:



Site Location:

ACM Project #

Sampling - Chain-of-Custody - Analysis Request Form

Suspect Asbestos Containing Building Material

Type of Project: Address:

Requested Turn Around Time:

Reference Number:

ロタゴクス

Requested Analysis; Instructions / Comments	WID											No.	
Sample Location	NE WI	Startage	F/or 2	Basma t	West wall	West wall		Floor 2	Flor 2	Fast exterior	Gast Exteris	Basone t	
Sample Description	Paster	//	1)	//	D(4 wa 1/	Dissa (Cotton insulation	Brown Cotton insulation	//	Asohalt Roof	Lawer Asphalt Roat	9,9 7.16	Sold (mint) Age
Sample Type (Bulk, Wipe, Other)	12 (R										-	>\	
Sample Identification		(\tau)	<u> </u>	9	2	2A	\sim	5	7	3	54	9	Submitted by: (sign)

am/pm

am/pm to

Time: From

(For lab use only) Samples processed by:

Received by: (sign) (

Date and time received: 3-5-1

ACM Engineering & Environmental Services, Inc.

ACM Project #

Sampling - Chain-of-Custody - Analysis Request Form

Suspect Asbestos Containing Building Material

26598 US 20 West

South Bend, Indiana 46628 Phone (574) 234-8435

Fnone (5/4) 234-843 Fax (574) 234-6800

Client: Wightman Petrie

Billing Address: 412 S. Corfue

Billing City, State, Zip: 5 - Bench (10)
Report Results To: (8) + 455

Sampling Date: 3/5/12 Sampled By: ASS

AIHA Environmental Microbiology ACCREDITED LABORATORY

Site Location: Cove Sinagague

Address:
Type of Project:

Requested Turn Around Time:

Reference Number:

NALAD

Requested Analysis; Instructions / Comments	272						\				7//2	3-5-12
Sample Location	Basmert						 				Date Submitted: 3/5/12	
Sample Description	9/29 Tile	White TSI	White TS)	Black Tor	Fire Band	Fire Board	Flower Floor Cover	`485			Sprint) Arely Sons	JASA (print) JUSTIN
Sample Type (Bulk, Wipe, Other)	Bu/R						-)					motival
Sample Identification	64	/	77	%	0	46	7				Submitted by: (sign)	Received by: (sign) Charthan (

IDEM Form 44593

Indiana Department of Environmental Management GUIDANCE FOR PREPARING ASBESTOS DEMOLITION/RENOVATION NOTIFICATIONS

**Per Indiana Rule 326 IAC 14-10-3(1), all notifications to the IDEM must be submitted on State Form Number 44593.

Per 326 IAC 14-10-5, demolition/renovation fees will be assessed quarterly to owners/ Operators submitting notifications during the previous quarter.

- I. Type of Notification -326 IAC 14-10-3(4).
 - A. If this is the <u>original notice</u>, please check the appropriate space on the notification form
 - B. If this is a <u>revised notice</u>, please check the appropriate space on the notification form. The revised notice must be postmarked and sent by certified mail, return receipt requested, at least 5 working days or delivered at least 2 working days before the start date of asbestos stripping or removal specified in: (1) the notice being revised <u>and</u> (2) the new revised notice. Facsimiles <u>will</u> be accepted by the IDEM.
 - C. All revisions must include a copy of the notice being revised.
 - D. If this is a <u>canceled notice</u>, please check the appropriate space on the notification form.
 - E. Courtesy Notification
- II. Facility Information 326 IAC 14-10-3(3)(B) and (R)
 - A. Either the owner or operator must submit the notice.
 - B. The owner means the individual(s) who own the property or lease the property.
 - C. The <u>operator</u> means the asbestos removal contractor or demolition contractor.
 - D. Specify the name, address, telephone number, Indiana license number and license expiration date, of the:
 - 1. asbestos removal contractor,
 - 2. inspector who conducted the assessment prior to demolition or renovation and
 - 3. project designer required or asbestos projects at schools K-12, or if project designer is used for non-school projects must be licensed.
- III. Type of Operation 326-IAC 14-10-3(3)(C), (O) and (S)
 - A. Refer to the definitions of demolition, renovation, and emergency renovation Operation in 326-IAC 14-10-2.
 - B. Ordered demolitions and emergency renovation operations have additional

- Notification requirements. Owner/operator must also complete Section XV or XVI of notification form.
- C. Demolition by intentional burning must comply with an approved Variance from Opening Burning Regulation 326IAC 4-1.

IV. <u>Is Asbestos Present? - Required by Federal 40 CFR Part 61, Subpart M</u>

- A. If asbestos is present, indicate "yes" in the space provided.
- B. If asbestos is not present, indicate "no".

V. <u>Procedures, Including Analytical Methods, if appropriate, Used to Detect the Presence and Amount of Asbestos Material - 326 IAC 14-10-3(3)(E).</u>

Describe how the asbestos was detected and, if samples were analyzed, specify the amount of friable asbestos visually during a walk-through inspections using a tape measure, blueprints, or pacing. Analytical methods could include the collection of samples and sample analyses by a polarized light microscope with dispersion staining.

For samples that test under 10% asbestos content: An owner or operator may (1) elect to assume material to be greater than 1% asbestos, or, (2) require verification by point counting in which the point counting result will supercede the visual estimation. Either choice and result should be stated on the notice when a sample is under 10% asbestos.

VI. Approximate Amount of Asbestos to be Removed - 326 IAC 14-10-3(3)(F)

- A. Specify the amount of regulated (friable) asbestos-containing material to be removed as follows:
 - 1. linear feet on pipes,
 - 2. square feet (surface area) on the facility components, and
 - 3. total cubic feet (volume) on or off all facility components. (All reported regulated amounts must be converted to cubic feet).
- B. Estimate the approximate amount of Category I and Category II non-friable asbestos-containing material in the affected part of the facility that will be removed before demolition.
- C. Estimate the approximate amount of Category I and Category II non-friable asbestos-containing material in the affected part of the facility that will not be removed before demolition.

VII. Scheduled Dates of Asbestos Stripping/Removal - 326 IAC 14-10-3(3)(H)

This means the actual start and end dates of the asbestos stripping or removal.

VIII. Scheduled Dates of Asbestos Stripping/Removal - 326 IAC 14-10-3(3)(H)

This means the starting and ending dates of the total demolition or renovation operation. For example: A renovation project may be scheduled from February 1 through March 15, 1995, however, the actual asbestos removal will occur from February 15, through 20, 1995. Demolition **must** start on date given in most recent notification.

IX Facility Description - 326 IAC 14-10-3(3)(D) and (G)

Include the building name, floor and number of the room(s) where the asbestos stripping or removal will take place. Provide enough detail that an unfamiliar inspector can find the asbestos project without asking anyone.

X. <u>Description of planned Demolition or Renovation Work, Methods/Techniques to be Used, and Affected Facility Components - 326 IAC 14-10-3(3)(K)</u>

Briefly describe the methods to be used to conduct the demolition or renovation. For renovations, these methods may include gross removal, glove bag removal, hand stripping or scraping. For demolitions, methods may include a wrecking Ball, bulldozer, dynamite, or unbolting panels or sections and carefully lowering to the ground. Affected facility components may include pipe wrap, floor tile, sprayed-on insulation, transite, etc.

- XI. <u>Description of Work Practices and Engineering Controls To Be Used To Prevent</u>
 <u>Emissions of Asbestos At the Site, Including Asbestos Stripping, Removal, and Waste</u>
 <u>Handling Procedures and the Procedures to Prevent Non-Friable Asbestos Material from</u>
 <u>Becoming Friable in the Course of the Project 326 IAC 14-10-3(3)(L)</u>
 - A. Examples of work practices and engineering controls to prevent asbestos emissions at the site would include: the use of water or wetting agents, containments, and negative air units during removal; placing into leak-tight containers or wrapping with six (6) mil thick polyethylene plastic sheeting which is properly labeled prior to disposal, etc.
 - B. Examples of removal and waste handling procedures to prevent non-friable material from becoming friable would include: removing by sections or units taking care not to crumble, pulverize, or reduce to power, using water to prevent any emissions, placing into leak-tight containers or wrapping with six (6) mil thick plastic which is properly labeled prior to disposal (including name or waste generator and location at which the waste was generated), etc.
- XII.** <u>Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Non-Friable Asbestos Material Becomes Crumbled, Pulverized or Reduced to Powder 326 IAC 18-3 and 326 IAC 14-10-3(3)(M).</u>
 - A. If the amount of unexpected asbestos or previously non-friable asbestos material is > 3 LnFt on pipes, 3 SqFt on other facility components, or a total of 0.75 CuFt on or off all facility components, then an accredited contractor (unless in-house accredited

personnel) with accredited personnel must implement the asbestos removal project in accordance with the requirements of 326 IAC 14-10.

- B. Pursuant to 326 IAC 14-10, a revised demolition/renovation notification must be submitted to the IDEM, which reflects the change in the amount of affected asbestoscontaining material. The revised notice must also reflect the new asbestos removal start date, if applicable.
- ** Required by 40 CFR Part 61, Subpart M

XIII. Waste Transporter - 326 IAC 14-10-3(3)(T)

Provide the name, address and telephone number of only the asbestos waste transporter. This should include the waste transporter's name, street address, city, state, zip code, contact person, and telephone number.

XIV. Waste Disposal site - 326 IAC 14-10-3(3)(N)

Provide the name and location of the sanitary landfill where the asbestos-containing waste material will be deposited. This should include the name, street address, city, state, zip code, waste disposal site contact person, and telephone number.

XV. <u>If Demolition Ordered by a Governmental Agency, Identify the Agency and Attach a Copy of the Order - 326 IAC 14-10-3(3)(O)</u>

- A. Provide the name, title and authority of the of the state or local governmental representative who has ordered the demolition .
- B. The authority is the applicable state or local regulation under which the demolition order has been issued.
- C. Attach a copy of the demolition order to the notice.

XVI. Emergency Renovations - 326 IAC 14-10-3(3)(S)

- A. Specify
 - 1. the date and hour that the emergency occurred,
 - 2. a description of the sudden unexpected event, and
 - 3. an explanation of how the event has caused emergency conditions
- B. An "emergency renovation operation" is a renovation operation that was not planned but results from a sudden, unexpected event. This term includes operations necessitated by non-routine failures of equipment.

XVII. <u>Certification Statement and Signature by Owner/Operator - 326 IAC 14-10-3(3)(O) and (P)</u>

Self-explanatory.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT NOTIFICATION OF DEMOLITION AND RENOVATION OPERATIONS

State From 44593 (R2 / 8-99)

I.	TYPE OF NOTI	FICATION (check one):	Original * Must inclu	Revised * ide copy of notification wh	Canceledich is being revised	Courtesy				
II.	FACILITY INFO	DRMATION (identify owner, r			<u> </u>					
	Owner:									
	Address:									
	City:			State:		Zip:				
	Contact:			Telephone	#:					
	Removal Contractor:_			Demolition Contractor:						
	Address:			Address:						
	City:	State:	Zip:	City:	State:	Zip:				
	Contact:		Phone:	Contact:	Phone:					
	IN License #:		Expiration:							
				(Required for asbesto	os projects at schools K –	12)				
	Inspector:			Project Designer:						
	Address:		_	Address:						
	City:	State:	Zip:	City:	State:	Zip:				
	IN License #:		Expiration:	IN License #: Expiration:						
	Phone:			Phone:						
III.		RATION (check one) ntentional Burning:	Renovation: Demolition:	Emergency Renovation: Ordered Demolition:						
IV.		PRESENT? (check one)	YES:	NO:						
V.	PROCEDURES	, INCLUDING ANALYTICAL M	IETHODS, IF APPROPRIATE	. USED TO DETECT THE PF	RESENCE AND AMOUNT OF A	ASBESTOS MATERIAL				
VI.	APPROXIMATE	AMOUNT OF ASBESTOS (In	ncluding Regulated ACM, Ca	tegory I non-friable Categor	y II non-friable ACM)					
		Regulated ACM to be removed		sbestos Material removed		Asbestos Material ed before demolition				
			Category I	Category II	Category I	Category II				
Pipes	(LnFt)									
	ce Area (SqFt)									
	Volume (CuFt) Components									
VII.	•	ATES OF ASBESTOS STRIP	PING/REMOVAL: Star	t:	End:	•				
VIII.		ATES OF RENOVATION:	Start: En		MOLITION: Start:	End:				
IX.	FACILITY DESC	CRIPTION (Including building	name, floor, and room numb	per)						
	Building Name:									
	Street Addre	ss:								
	City:			State:	County:					
	Location of re	emoval within building:								
	Building Size	(SqFt):			# of Floors:	Age:				
	Present Use:	Present Use: Prior use:								

X.	DESCRIPTION OF PLANNED TYPE OF MATERIALS REMO		VATION WORK, ME	THODS/TE	CHNIQUES TO BE US	ED, AFFEC	TED FACILITY CO	MPONENTS AND
XI.	DESCRIPTION OF WORK PR INCLUDING ASBESTOS STR BECOMING FRIABLE IN THE	IPPING, REMOVAL AND	WASTE HANDLING					,
XII.	DESCRIPTION OF PROCEDU MATERIAL BECOMES CRUM				CTED ASBESTOS IS F	OUND OR I	PREVIOUSLY NON	I-FRIABLE ASBESTOS
XIII.	WASTE TRANSPORTER			XIV.	WASTE DISPOSAL S	SITE		
, and	Name:			7	Name:			
	Address:				Address:			
	City: S				City:Contact:			
	Contact.	i none			Contact.		i none	
XV.	IF DEMOLITION ORDERED B FACILITY IS NOT INSPECTED DEMOLITION OR ASSUME A	D PRIOR TO DEMOLITION	N, THE DEBRIS MU	ST BE KEP	T ADEQUATELY WET.	THE DEB	RIS MUST THEN B	E INSPECTED AFTER
	Name:		Title:			Date or	dered to begin:	
	Authority:					Date of	Order:	
XVI.	FOR EMERGENCY RENOVA	TIONS:			Date and time of emer	gency:		
	Description of sudden, unexper	cted event:						
	Explanation of how the event of	caused unsafe conditions of	or would cause equir	oment dama	ae:			
XVII.	IHEREBY CERTIFY THAT THE SUPERVISORS, TO IMPLEME INDIANAPOLIS AIR POLLUTIC WAS ACCOMPLISHED SHALL	ENT THIS ASBESTOS PRO ON CONTROL BOARD RE	JECT, WHICH HAVI GULATION 14. THE	EBEENTRA ETRAINED	AINED IN 326IAC 14-10; INDIVIDUAL(S) ALONG	40 CFR PAI	RT 61, SUBPART M	; AND, IF APPLICABLE,
	Owner/operator (signature)				date			
	Owner/operator (printed)				affiliation			
******	*******	********	*** OFFICEUSEC	NLY *****	*******			
DOSTM	ADK.	DECEIVED:		DEVIE	MED BV:		DEEICIENICIE	c.