



Memo

To **Ms. Lisa Johnson** File no. **7-417-000764**
Nevada Division of Environmental Protection

From **Don Swigonski** c **file**

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Date **June 5, 2007**

Subject ASBESTOS EVALUATION AND CHEMICAL INVENTORY
Gabbs Recreation Center
Gabbs, Nevada

PURPOSE

The purpose of this memorandum is to document the hazardous materials located at the Gabbs Recreation Center, Gabbs, Nevada. AMEC was retained by the Nevada Division of Environmental Protection Brownfield Program (NDEPBP) to assess the property for hazardous materials, quantify those materials present and prepare recommendations for their removal and disposal. These include potential asbestos containing building materials (ACM), discarded chemicals, and other potentially hazardous materials. AMEC understands that the community wishes to demolish the structure and needs to remove regulated hazardous materials prior to demolition.

BACKGROUND

The Gabbs Recreation Center was originally a military structure that was moved to the site almost 50 years ago. Apparent modifications to the structure included addition of a kitchen and dining area. A fire damaged the northeast portion of the building. This damage was not repaired. Ninyo and Moore conducted a Phase I Environmental Site Assessment, dated July 8, 2003, for Nye County of this site. This assessment included a limited survey of potential ACM. This assessment noted the presence of potentially hazardous chemicals and materials in the facility but did not quantify them. In addition, Ninyo and Moore's asbestos survey results did not include all readily apparent types and quantities of the ACM.

AMEC prepared a site specific Health and Safety Plan for the site, dated April 2007. This plan included methods to be employed to further characterize the hazardous materials at the site. The contents of the plan were approved by NDEPBP.

ASSESSMENT ACTIVITIES

On Thursday, April 19, 2007, Andrew Sato (Sato Environmental Consulting) and Don Swigonski (AMEC Earth & Environmental, Inc.) met with Ms. Connie Petritz (Nye County) and Mr. Dale Clark

(Gabbs Town Advisory Board) at the Gabbs Recreation Center for a site walkthrough to review the facility and to note any potential hazards or safety concerns that might affect the asbestos survey and hazardous materials inventory.

Once the walkthrough was complete, Mr. Sato collected samples of suspect ACM. AMEC inventoried fluorescent light fixtures, thermostats and chemicals located in and around the facility.

The following items were noted on site.

Fluorescent Light Fixtures

Kitchen	One 4-foot-long light One 6-foot-long light
Basement	Two 4-foot-long lights Three 6-foot-long lights
Auditorium	Six 4-foot-long lights

The fluorescent lights had two ballasts per fixture. Two accessible ballasts were inspected and contained no labeling that indicated PCBs. Typically, newer PCB free ballasts are so labeled. The ballasts showed signs of leakage. No samples were collected of the ballasts oils. Due to the age of the building and a lack of labeling information, these lights should be assumed to contain PCBs.

Thermostats

Two thermostats were noted, one by the kitchen door and the other in the auditorium. Mr. Clark was not aware of any other thermostats in the facility.

Chemicals

The following chemicals were noted on site.

- **Outside**
 - Tar with some water; one 5-gallon pail.
- **Basement**
 - Latex paint, five 1-gallon containers. Two were unopened and full; three were opened and half full of dry paint.
- **Janitor Supply Room**
 - Floor wax, 18.9-liter plastic bag inside a cardboard box
 - Latex paint, one 5-gallon pail unopened

- Oil, one 5-gallon pail empty
- Floor stripper, one 5-gallon pail
- Chlorox, 1/2-gallon plastic bottle
- PineOl 6, one 1-gallon metal container
- Latex paint, eight 1-gallon containers
- Enamel paint, four 1-gallon containers
- Stripping compound, one 1-gallon container
- Ajax/Comet cleaner, three 12-ounce containers
- Dust mop spray, three 19-ounce aerosol containers
- Windex, one 16-ounce spray bottle
- Gym floor finish, two 1-gallon containers
- "Conqr dust" for mop, one 1-gallon container
- Gym floor spray finish, one 5-gallon pail
- SOS "Standard Sanitation System," one 5-gallon pail

It is likely that not all of these are hazardous. However all are prohibited by regulation from disposal at a Class III landfill. The EPA preferred management of these materials is use, re-use, recycling and finally, where the foregoing cannot be implemented, appropriate treatment and disposal.

Asbestos Containing Materials

Findings of the asbestos sampling and analysis conducted by Sato Environmental Consultants, Inc. are attached as a separate report. Sato's findings include the following:

All the asbestos detected in the building was of the chrysotile variety. Asbestos was detected in five materials located in four functional areas. These include:

- 80 square feet of vinyl floor tile in the women's restroom
- 300 square feet of vinyl floor tile and mastic in the kitchen
- 500 square feet of floor tile mastic in the basement west of the kitchen and 80 square feet of joint compound, plaster and skim coat on the beams in the basement area west of the kitchen, and
- 350 square feet of floor tile and sheet flooring in the northeast hall and first floor rooms of the structure.

Only the joint compound, plaster and skim coat are considered friable.

Roofing penetration sealing materials contain between 3 and 10 percent chrysotile. These materials are Category I materials, which if not in poor conditions and not friable, do not have to be removed prior to demolition, except where demolition is by intentional burning. Therefore, the roofing materials were not included in the square footage calculations for abatement for this project.

Joint compound within the wall systems of the building also contains asbestos. This material can also be left in place during demolition. However special consideration of demolition practice should be employed to minimize the potential for asbestos fiber release during this activity as well as during disposal.


RECOMMENDATIONS

Based on the findings of this phase of the evaluation, we recommend that NDEP:

- 1) Prepare ACM removal/abatement plan(s), specifications and bid document(s),
- 2) Appropriately use, recycle and/or dispose of the listed chemicals,
- 3) Dispose all fluorescent lights and ballasts as hazardous materials.

Reviewed by,

AMEC Earth & Environmental, Inc.

A handwritten signature in black ink, appearing to read "Brett Whitford". The signature is written in a cursive, somewhat stylized script.

Brett Whitford, C.E.M.
Environmental Services Manager
Asbestos Consultant IJ0769

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances.