

June 26, 2012 Project No. 127835.01

Mr. David P. Friedman
Nevada Division of Environmental Protection
Bureau of Corrective Actions
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

**Subject:** Post Abatement Closeout Report

Removal of Asbestos Cement Pipe and Asbestos Cement Panels

Greenhouse Structures
Moapa Band of Paiutes
Moapa River Preservation
Moapa, Clark County, Nevada

Dear Mr. Friedman:

The purpose of this report is to document results of Kleinfelder's observation of asbestos abatement activities and post-abatement visual clearance inspections conducted during removal of stock-piled asbestos-cement pipe (ACP) located near the Large Greenhouses, and asbestos-cement panels from the Small Greenhouse at the Moapa Band of Paiutes, Moapa River Reservation, Moapa, Nevada (Site). The stock-piled lengths of ACP were identified during a limited asbestos survey performed as part of Kleinfelder's Phase I Environmental Site Assessment (ESA) for the Large Greenhouses, documented in the Phase I ESA report dated March 1, 2012. The asbestos-cement panels were identified during a limited asbestos survey performed for the Small Greenhouse, documented in Kleinfelder's Limited Asbestos Survey report dated June 28, 2011. The work was completed under the existing contract between Kleinfelder and the Nevada Division of Environmental Protection (NDEP) (Contract No. DEP 10-008).

Observation of asbestos abatement activities and post-abatement visual clearance inspections were conducted in accordance with Kleinfelder's proposal dated June 7, 2012, and our Asbestos Abatement Specification and Lead Related Workplan for the Moapa Senior Center, Large Greenhouses, and Small Greenhouse, dated May 25, 2012. The following section details the abatement activities performed at the Site.

#### **SUMMARY OF ABATEMENT ACTIVITIES**

Asbestos abatement activities commenced at the Site on June 14, 2012, and were observed by Mr. Mark Lee, a State of Nevada Licensed Asbestos Abatement Consultant (AAC), No. IJPM-1483. The removal of stockpiled ACP and asbestoscement panels was completed by Walker Specialty Construction Inc., (Walker), a State of Nevada-licensed asbestos abatement contractor (license No. 0047312). Copies of Kleinfelder's daily project logs are provided as Attachment A.

#### Small Greenhouse Structure - Asbestos Cement Panels

Walker personnel established a regulated area around the exterior perimeter of the small greenhouse structure using asbestos hazard warning tape. The removal of the asbestos-cement panels was completed using portable electric drills to remove bolts fastening the panels to the structure's aluminum frame and shovels to loosen the soil from around the bottom of the panels. Wet methods were employed using an airless sprayer as needed. The panels were loaded by hand into a roll-off bin supplied and transported by Discount Dumpsters. The bin was lined with two layers of 6-mil polyethylene (poly) sheeting, positioned inside the established regulated area, and labeled with asbestos hazard warning signs and warning tape. After sections of the panels were removed from the greenhouse frame, loose asbestos-containing debris (i.e., broken pieces of asbestos-cement panels) remaining in and around the perimeter of the greenhouse were placed in 6-mil poly bags and subsequently placed in the same roll-off dumpster as the sections of panels. Removal of the asbestos cement panels was completed on June 15, 2012.

Kleinfelder, accompanied by Walker personnel, conducted a post-abatement visual clearance inspection inside the regulated area of the small greenhouse on June 15, 2012. The inspection was conducted to assess the completeness of abatement activities in accordance with industry standards and state and local regulations. Based on the visual clearance inspection, the identified asbestos-cement panels appeared to have been adequately removed from the Site. However, since the Small Greenhouse is abandoned and dirt, debris, and tall weeds are present inside and around the structure, the possibility exists that additional sections of asbestos panels may be discovered during future site redevelopment activities. If discovered, these materials would need to be removed by a State of Nevada-licensed asbestos abatement contractor.

#### Large Greenhouse Structure - Asbestos-Cement Pipes

Removal of approximately 100 linear feet of stock-piled sections of ACP located near the large greenhouse structure was completed on June 14, 2012, concurrently with the abatement work at the Small Greenhouse. Walker personnel wrapped sections of ACP in 6-mil poly sheeting and then placed the wrapped sections of ACP into the back of a Walker Specialty Construction vehicle, which was also lined with 6-mil poly sheeting. The wrapped ACP was then transferred to the same roll-off bin as the asbestos-cement panels removed from the small greenhouse structure. Following completion of abatement activities, the roll-off bin was transported under an Asbestos Waste Shipment Record (Manifest No. A5695) for disposal at Western Elite Landfill located in Las Vegas, Nevada. A copy of the Asbestos Waste Shipment Record is provided as Attachment B.

A visual clearance inspection of the area where ACP was removed was conducted on June 14, 2012, by Mr. Lee, following removal of the identified ACP. The inspection was conducted to assess the completeness of abatement activities in accordance with industry standards and state and local regulations. Based on the visual clearance inspection, the identified sections of ACP appeared to have been adequately removed from the site. It should be noted that additional sections of ACP may still be present at the site concealed under surrounding tall weeds, debris, and dirt. If additional ACP is discovered, the ACP would need to be removed by a State of Nevada-licensed asbestos abatement contractor.

#### **LIMITATIONS**

This work was performed in a manner consistent with that level of care and skill ordinarily exercised by other members of Kleinfelder's profession practicing in the same locality, under similar conditions, and at the date the services are provided. Our conclusions, opinions, and recommendations are based on a limited number of observations and data. It is possible that conditions could vary between or beyond the data evaluated. Kleinfelder makes no other representation, guarantee or warranty, express or implied, regarding the services, communication (oral or written), report, opinion, or instrument of service provided.

Kleinfelder offers various levels of investigative and engineering services to suit the varying needs of different clients. It should be recognized that definition and evaluation of environmental conditions are a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with incomplete knowledge of site conditions present due to the limitations of data from field studies. Although risk can never be eliminated, more-detailed and extensive studies yield more information, which may help understand and manage the level of risk. Since detailed study and analysis involves greater expense, our clients participate in determining levels of service that provide adequate information for their purposes at acceptable levels of risk. More extensive studies should be performed to reduce uncertainties. Acceptance of this report will indicate that the NDEP has reviewed the document and determined that it does not need or want a greater level of service than provided.

Kleinfelder assumes no responsibility or liability whatsoever for any claim, loss of property value, damage, or injury that results from hazardous materials encountered at the Site. Nothing contained in this report should be construed or interpreted as requiring Kleinfelder to assume the status of an owner, operator, or generator within the meaning of any governmental statute, regulation, or order. The NDEP and/or the Moapa Band of Paiutes are solely responsible for directing notification of all governmental agencies, and the public at large, of the existence, release, treatment, or disposal of any hazardous materials observed at the Site, either before or during performance of Kleinfelder's services.

If you have questions regarding this project, please contact Phil Tousignant at (775) 689-7800.

Respectfully submitted,

KLEINFELDER WEST, INC.

Mark L. Lee

State of Nevada Certified Asbestos Abatement Consultant No. IJPM-1483

Mark & L

Richard Stevenson

State of Nevada Certified Asbestos
Abatement Consultant No.IJPM-1611

Phil Tousignant, CEM Environmental Scientist

#### Attachments:

A Consultant Documentation

B Copy of Asbestos Waste Shipment Record

Copies with attachments to:

Moapa Paiute Farm, Moapa River Indian Reservation, Attention Mr. William Anderson, One Lincoln Street, PO Box 340, Moapa, Nevada 89025-0340

# ATTACHMENT A CONSULTANT DOCUMENTATION



### ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG

Client: Nevada Division of Envi	ronmental Protection J	ob No.: <u>127835-01</u>
Project: <u>Greenhouse Structures</u>	s, Moapa River Indian Reserv	ation, Moapa, Nevada
Work Area(s): Small Greenhous	se	
Date: 6-14-12	Day No.: 1 Shift	No:
1. CONTAINMENT CHECK	☐ N/A During This Phase	Comments:
Containment Integrity OK	☐ Yes ☐ No ☒ N/A	Installed Regulated Area
Decon. Unit/airlocks OK	☐ Yes ☐ No ☒ N/A	
Area Secured/sign Posted	Yes □ No □ N/A	
HVAC & Utilities Off/Locked Out	☐ Yes ☐ No ☒ N/A	
Negative Pressure System OK	☐ Yes ☐ No ☒ N/A	Exterior abatement
Negative Pressure Reading	H₂O	
2. PERSONAL CHECK	☐ N/A During This Phase	Comments:
Containment Entrance Log OK	☐ Yes ☐ No ☒ N/A	
New Personnel Qualifications. OK	⊠ Yes □ No □ N/A	See below
Personal Protective Equipment OK	⊠ Yes □ No □ N/A	
Respirator Type	☐ Type H ☐ PAPR	Half Face Respirators
	☐Type C ☐None	P100 Cartridges
3. WORK PRACTICE CHECK Abatement Techniques OK	<ul><li>N/A During This Phase</li><li>Yes □ No □ N/A</li></ul>	Comments:
ACBM Adequately Wet		as needed
Waste Bagged & Labeled OK		"burrito-wrapped"
Waste Load-out OK General Housekeeping OK		
Activity Description	☐ Preparation ☐ Removal	1
	☐Clearance ☐ Clean up	
# Of outside samples collected	N/A During This Phase     PCM    TEM     TEM	Comments:
# Of outside samples collected	PCM TEM	

ADDITIONAL COMMENTS AND ACTIVITIES SUMMARY OF REVERSE SIDE OF PAGE



### ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG (CONTINUED)

Activities Summary: Work area around small greenhouse delineated with asbestos hazard warning tape identifying a regulated area. Worker certifications/license were noted as follows; Clemente A. Contreras, supervisor license # 5-7225 expires 7-14-12, Jose Ruiz, worker license #A-6941 exp. date reflected license number, Mr. Ruiz certification number 61822303440730412 was confirmed bearing expiration date 4-28-13 Jose J. Limon, worker license #A-7436 expires 7-14-12 and Omar Blanco, worker license #A-6611 expires 10-8-12. Workers donned proper PPE including tyvek, hard hats, boots, and 1/2 face respirators with P100 cartidges. Workers observed using wet manual removal methods with portable drill to remove bolted panels from frame and shovels to loosen dirt from bottom of panels/skirting. Bottom of panels are buried ~10" bgs. Waste debris loaded into a roll-off bin lined with layers of 6-mil. poly. Bin was labeld and stored inside the regulated area.

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Visits By r	egulatory Agen	cies: None		F1	T.	
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### ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG

Client: Nevada Division of Envir	onmental Protection J	ob No.: <u>127835-01</u>
Project: <u>Greenhouse Structures</u>	, Moapa River Indian Reserv	ation, Moapa, Nevada
Work Area(s): Small Greenhous	se	8 2 8
Date: 6-15-12	Day No.: 2 Shift	No:
1. CONTAINMENT CHECK	☐ N/A During This Phase	Comments:
Containment Integrity OK	☐ Yes ☐ No ☒ N/A	Installed Regulated Area
Decon. Unit/airlocks OK	☐ Yes ☐ No ☒ N/A	Ti .
Area Secured/sign Posted	⊠ Yes □ No □ N/A	
HVAC & Utilities Off/Locked Out	☐ Yes ☐ No ☒ N/A	
Negative Pressure System OK	☐ Yes ☐ No ☒ N/A	Exterior abatement
Negative Pressure Reading	-H₂O	2
2. PERSONAL CHECK	☐ N/A During This Phase	Comments:
Containment Entrance Log OK	☐ Yes ☐ No ☒ N/A	
New Personnel Qualifications. OK	☐ Yes ☐ No ☒ N/A	,
Personal Protective Equipment OK	⊠ Yes □ No □ N/A	
Respirator Type	☐ Type H ☐ PAPR	Half Face Respirators
	☐Type C ☐None	P100 Cartridges
3. WORK PRACTICE CHECK Abatement Techniques OK	☐ N/A During This Phase ☐ Yes ☐ No ☐ N/A	Comments:
ACBM Adequately Wet	⊠ Yes □ No □ N/A	as needed
Waste Bagged & Labeled OK	☐ Yes ☐ No ☐ N/A	"burrito-wrapped"
Waste Load-out OK	Yes □ No □ N/A	
General Housekeeping OK Activity Description		
Activity Description	☐ Clearance ☐ Clean up	
4. AIR MONITORING # Of inside samples collected # Of outside samples collected	N/A During This Phase PCM TEM PCM TEM	Comments:

ADDITIONAL COMMENTS AND ACTIVITIES SUMMARY OF REVERSE SIDE OF PAGE



### ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG (CONTINUED)

Activities Summary: Abatement contractor on site and completing work prior to Kleinfelder's arrival on site. Contractor arrived on site earlier in an effort to complete the work during cooler temperatures. Workers observed wearing proper PPE and using manual methods for removal.

Post abatement visual inspection completed by Kleinfelder did not result in a discovery of any additional asbestos panels or chards of the material. The asbestos cement panels appeared to have been adequately removed from the regulated area. The asbestos waste was burrito wrapped inside the roll-off bin, the bin was labeled with asbestos hazard warning signs and asbestos hazard warning tape was applied to the bins exterior. The asbestos hazard warning tape delineating the regulated area was then removed

Any Problems Encountered: The abatement contractor was not able to remove the roll-off bin immediately following abatement removal. The owner/generator portion of the waste manifest did not reflect the correct owner name or telephone number. The contractor will complete a new waste manifest and coordinate the removal of the roll-off bin with Ms. Linda Donahue at the farms site office, who has also identified herself as signatory for the manifest form

Visits By reg	gulatory Agend	ies: None				
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Prepared By: Mark Lee



### ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG

ironmental Protection J	ob No.: <u>127835-01</u>					
Project: Greenhouse Structures, Moapa River Indian Reservation, Moapa, Nevada						
estos Cement Pipe (ACP), nea	ar Large Greenhouse					
Day No.: 1 Shift	No:					
N/A During This Phase     N/A Durin	Comments:					
☐ Yes ☐ No ☐ N/A						
☐ Yes ☐ No ☐ N/A						
☐ Yes ☐ No ☐ N/A						
☐ Yes ☐ No ☐ N/A						
☐ Yes ☐ No ☐ N/A						
-H <sub>2</sub> O						
☐ N/A During This Phase	Comments:					
☐ Yes ☐ No ☒ N/A						
⊠ Yes □ No □ N/A	See day 1, sm. grn house					
⊠ Yes □ No □ N/A	1					
☐ Type H ☐ PAPR	Half Face Respirators					
☐Type C ☐None	P100 Cartridges					
☐ N/A During This Phase ☑ Yes ☐ No ☐ N/A	Comments:					
⊠ Yes □ No □ N/A	as needed					
	"burrito-wrapped"					
⊠Clearance ☐ Clean up						
N/A During This Phase PCM TEM	Comments:					
	estos Cement Pipe (ACP), nea  Day No.:1 Shift  N/A During This Phase Yes					

ADDITIONAL COMMENTS AND ACTIVITIES SUMMARY OF REVERSE SIDE OF PAGE



## ASBESTOS ABATEMENT OVERSIGHT DAILY PROJECT LOG (CONTINUED)

donned PPE with respirator and load vehicle. The ACP was moved to the small greenhouse and loaded the AC generally intact at the time of remova Kleinfelder conducted a post abatems stock-piled ACP and found the area to many tall weeds, other debris, and di	ed sections of A roll-off bin park P into the roll-o ll. ent visual inspe to be adequatel	ACP into the line and inside the result of the AC ection at the form of a part of the state of the form of the for	ed bed of a gulated are P appeared mer location ver the are	Walker ea of the to be
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Any Problems Encountered: None	3			
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<mark>/isits By regulatory Agencies: N</mark> o	one			7.00

## ATTACHMENT B COPY OF ASBESTOS WASTE SHIPMENT RECORD

#### ASBESTOS WASTE SHIPMENT RECORD - Instructions on back of form

Date Re	esponsible Agency Notified: Date L	andfill Notified:	Waste Certif	ficate No.:
THE STATE OF	1. Work Site Lincoln Street & Paqur	Onev	Owner's Name	Owner's Telephone #
	Name: Moapa Band of Paiutes	JOHSY	Linda Donahue	
E-15	Mailing Address: PO Box 340		rrugs pousude	702-264-0440
100			•	,
1000	2. Operator's name and address:			Remover's Telephone #
5451-T	Name: Walker Specialty Construc	tion, Inc.		Í
	Mailing Address: 6428 Windy Road		)	(702) 243-2500
12000	City/State/Zip: Las Vegas, NV 89119			
136	License #: 0047312		The state of the s	
100	3. Waste Disposal Site (WDS), meaning the facility t	hat will receive the v	vaste:	WDS Telephone #
	Name: Western Elite Landfill			
	Mailing Address: 420 N. Nellis Blvd. A3-234	2 9		702-369-4242
	City/State/Zip: Las Vegas, NV 89110			702-309-4242
	Physical Location: US HWY 93, Mile Marker 8, Lincol	County MIV		
ê		THE RESERVE THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO I	- W- Di-List Do D	
R form)	4. Name and address of responsible agency:	Southern Nevada He	ealth District, PO Box 3902,	
GENERATOR tain copy of fo	6. Description of materials:	1001 E 14 1	6. Containers	7. Total quantity
AT y C	Friable or Nonfriable asbestos material: NON-FR	THISLE ACM	(drums, bags, etc)	(cu ft., lbs, tons)
R. 60	Hazard Class: 9		No. Type	
E SC	Identification #: NA2212		, 6mil	200 1-
He is	Packing Group: III TRANSITE ST	DING	8117577	20 yds
GENERATC Retain copy of	Reportable Quantity: TRANSITE P	DE	BURRITO	
	8. Special handling instructions and additional info			Emergency Telephone #
	* Handled in accordance with all EPA, NESHAP, and O			amergency receptione if
	* Asbestos waste are adequately wetted and containerize		leace	
	* Asbestos containers are labeled in accoradance with	•	lease	
	Aspestos containers are labeled in accordance with	U CFR Part 61.149		
			consignment are fully and a	
	by proper shipping name and are classified, packed, ma			r condition for
	transport by highway according to applicable internation	al and government re	gulations.	
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TRAN:	Las Vegas, NV 89110	<u>s</u>	ignature	Emergency Telephone #
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<u>R</u>	Painte ditempel non- 0 state	except as noted in ite	Hillians and the second	
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