



September 24, 2024

Scott Owens  
R.A.I., Inc.  
1390 13<sup>th</sup> Street  
PO Box 776124  
Steamboat Springs, CO 80477  
NWCC Project No: 24-13440

Subject: Inspection for Asbestos Containing  
Building Materials, 62 West Acres  
Drive, Steamboat Springs, Colorado

Dear Mr. Owens:

NWCC, Inc. (NWCC) is pleased to present results of an inspection for asbestos containing building materials (ACBMs) conducted on September 18, 2024 at an approximate 1,375 square foot (ft<sup>3</sup>) mobile home located at 62 West Acres Drive, Steamboat Springs, Colorado. On June 17, 2024, a plane crashed into the West Acres Mobile Home Park, resulting in the collapse and partial incineration of the mobile home. Scott Owens, a contractor, requested the asbestos inspection for building demolition purposes. NWCC conducted the inspection under contract with the R.A.I., Inc.

NWCC conducted an initial site visit on September 5, 2024. Based upon observations, the building materials were burned or charred. The southern portion of the structure still stood and the northern portion had completely collapsed. Dry wall, tar roofing, and window caulking were observed among the rubble during this site visit.

Based on the condition of the mobile home and remaining materials, it was determined to phase the work and collect bulk samples for analyses first. If asbestos containing building materials triggering regulatory square footages/volumes were identified, then the entire remaining structure and debris field would be considered Asbestos Containing Building Materials (ACBMs), requiring asbestos mitigation.

NWCC collected bulk samples that were deemed safely accessible on September 18, 2024. An inspection for ACBMs is required prior to renovation or demolition of commercial properties that may disturb materials identified as "suspect ACBMs" encompassing a greater than 160 square foot (ft<sup>2</sup>) area, in accordance with Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Commission (AQCC) Regulation No. 8, Part B (Part B).

The inspection was conducted to help determine the presence and condition of suspect ACBMs. Inspection activities included a visual assessment of suspect ACBMs, collection of bulk samples, laboratory testing, and report preparation. The asbestos inspection was performed in accordance with Part B using the industry standard level of care typical for

the type of building and use. A discussion of inspection, sampling, and test results is provided in the following three sections and attachments.

- Section 1.0 Asbestos Inspection
- Section 2.0 Findings and Recommendations
- Section 3.0 Limitations
- Attachment A – Field Log
- Attachment B – Laboratory Results
- Attachment C – General Information

## 1.0 Asbestos Inspection

Building materials potentially containing asbestos were categorized as “homogenous areas”, which are areas representing like materials exhibiting similar characteristics (e.g. uniform color and texture) and age (e.g. construction period). Each era of construction is considered unique and the areas were inspected as separate homogeneous areas, excluding flooring materials and common insulation. Physical room divisions within the building are each considered a functional space and may represent different construction histories that include different materials. However, because of distinct similarities, certain materials found in different functional spaces may have been grouped into the same homogenous area(s).

Material descriptions summarized below are based upon inspection observations and may differ from analytical report sample descriptions. Square footage estimates are based solely on observations of visible building materials. It is probable that additional building materials of homogeneous areas described below are buried within debris or were reduced to ash in the fire. Approximate sample locations described in a field log and select photographic documentation are provided in Appendix A. Identified homogeneous areas and collected samples include the following.

- *White, Drywall*: Two samples (*DRY1 and DRY2*) including associated components (e.g., tape and joint compound) were collected from approximately 3,025 ft<sup>2</sup> of assumed walls and ceilings in the remaining rubble. The collected samples were classified as friable miscellaneous material observed in significantly damaged condition.
- *White, Caulk*: Two samples (*CALK1 and CALK2*) were collected from approximately 42 linear feet of window trim from the south facing window system. The collected samples were classified as friable miscellaneous material observed in damaged condition. The quantity of this material is estimated at less than 1-gallon.
- *Black, Tar Roofing Underlayment*: Two samples (*TAR1 and TAR2*) were collected from approximately 1,300 ft<sup>2</sup> of roofing underlayment on the south portion of the structure. The collected samples were classified as friable miscellaneous material observed in significantly damaged condition. In accordance with Reg. 8 Section IV.F.2. d. this material was classified as damaged or significantly damaged friable miscellaneous ACM.

A total of six samples, classified as miscellaneous material, were collected for asbestos testing. None of the samples were classified as surfacing material or thermal system insulation. Suspect materials were observed in damaged and significantly damaged condition as defined in Part B.

The potential for disturbance during demolition includes air, physical, and vibration disturbances as defined in Part B. Each potential ACBM was hand touched to determine its friable or non-friable nature. A material is considered friable if when dry, it can be crumbled, pulverized, or reduced to powder by hand pressure. "Friable asbestos-containing material" means any material that contains asbestos and when dry can be crumbled, pulverized, or reduced to powder by hand pressure and that contains more than one percent asbestos by weight, area, or volume. The term includes nonfriable forms of asbestos after such previously nonfriable material becomes damaged to the extent that when dry it can be crumbled, pulverized, or reduced to powder by hand pressure. Building materials sampled were considered friable. It should also be noted that some building materials in different locations may have been reduced to ash and rendered friable in the fire.

The collected samples were evaluated for the presence of asbestos using Polarized Light Microscopy (PLM). Aerobiology Associates Laboratory, Inc. (Aerobiology) of Golden, Colorado provided asbestos testing services under contract with NWCC. Based upon AQCC regulations, a material is considered an ACBM if greater than 1% asbestos fibers are present. Laboratory reports are provided in Attachment B.

## **2.0 Findings and Recommendations**

Based upon AQCC regulations, a material is considered an ACBM if greater than 1% asbestos fibers are present. If one sample in a homogenous area, tests positive for asbestos above the 1% threshold, then all of the like material in that homogenous area is considered ACBM even if asbestos is reported below the 1% threshold in other associated samples. Samples exceeding the 1% threshold are noted above in **bold** font and summarized below.

### Black Tar Roofing

- Chrysotile asbestos reported at 4% in the silver resinous material (Sample TAR2) component of the tar roofing collected from roofing underlayment on the south portion of the structure. All tar roofing in this homogenous area is considered ACBM.

The black, tar roofing covers the entirety of the approximately 1,300 ft<sup>2</sup> footprint of the structure, which is above the regulatory trigger level. Due to the plane crash and resulting fire, tar roofing is most likely dispersed throughout the rubble and indistinguishable from other building materials.

Asbestos was not identified in any other samples. The remaining structure remnant and debris was destroyed by fire. Based on the debris piled in the structure and remaining in the debris field outside the building, it is likely that other ACBM is buried and hidden. Moreover, various building materials have been reduced to ash and are unrecognizable. Because ACBM was identified above the trigger levels and based on the materials condition, NWCC recommends that the entire site be abated by a certified asbestos abatement contractor. Regulation 8 Section III. A, requires that a copy of this inspection report be on-site during deconstruction, demolition, and/or asbestos abatement activities.

## **3.0 Limitations**

This report has been prepared for your exclusive use for building demolition purposes. The asbestos inspection was performed in a manner consistent with the level of care and skill ordinarily exercised by members of the same profession currently practicing in the same locality under similar conditions. In conducting the inspection, NWCC made a

reasonable effort to observe and evaluate all building materials within the areas discussed above.

There is no guarantee that suspect materials are not hidden or buried within the facilities. The act of determining the presence or absence of asbestos fibers in a particular homogeneous area should not be interpreted as a guarantee that asbestos does or does not exist, rather it is an opinion based upon extrapolation and interpretation of limited test results to materials exhibiting similar physical appearances, locales, and histories. There are no guarantees regarding the reliability and accuracy of the information provided except precisely where each material sample was collected. No other warranty, expressed or implied, is given based upon the content of this report.

NWCC appreciates the opportunity to provide you with environmental services. Please contact the undersigned regarding any questions or concerns associated with this project.

Sincerely,

**NWCC, Inc.**

COLORADO ASBESTOS CONSULTING FIRM  
REGISTRATION NO. ACF- 16685



Madeline Bartell, C.A.B.I.  
Environmental Consultant  
Certified Asbestos Building Inspector No. 29035



Gary R. Webber, P.G., V.P.  
Senior Environmental Consultant/Vice President

Attachments

## **Attachment A**

# ASBESTOS ASSESSMENT SAMPLING FIELD FORM

Project Name/Number: 62 W Acres Dr 1340

General Site Description: \_\_\_\_\_

Inspector: MRB

Date Inspected: 9/18/24

Sample Designation	Material Type	Friability	Material Condition	Material Color	Sample Description	Sample Location	Estimated Surface Area*
DRY1	mm	F	SD	white	Drywall	West Side of house, 40 ft from Northwest corner.	3025sf
DRY2	1	1	1	1	1	West side of house, in west mud room entry way, 13 ft from Southwest corner.	1
CALK1	mm	F	DC	white	Calking	Exterior of windows on South wall, westernmost window, 2 ft from bottom west corner.	42 LF
CALK2	1	1	1	1	1	Exterior of windows on South wall, easternmost window, 1 ft from bottom east corner.	1
TAR1	mm	F	SD	Black	TAR roofing.	Southwest side of the roof, 10 ft from the southwest corner.	1,300sf
TAR2	1	1	1	1	1	South side of the roof, 46 ft from North west corner.	1

## Notes:

Material types: SM = Surfacing Material, TSI = Thermal System Insulation, MM = Miscellaneous Materials

F = Friable, PF = Potentially Friable, NF = Not Friable

Condition: GC = Good Condition, D = Damaged, SD = Significantly Damaged

Sample Rate: For SM = 3 < 1,000 sf, 5 < 5,000 sf, 7 > 5,000 sf. For Friable TSI = 3 samples minimum. For MM = Minimum of 2 samples per material.

Damage Potential: Air, Physical, Vibration.

## **Attachment B**

**Certificate of Analysis**


Client Name: NWCC Inc.  
Street Address: 2580 Copper Ridge Drive  
City, State ZIP: Steamboat Springs, CO 80487  
Attn: Madeline Bartell  
**Client Project Name:** 13440 / 62 W Acres Dr.



Date Collected: 9/18/2024  
Date Received: 9/19/2024  
Date Analyzed: 9/19/2024  
Date Reported: 9/19/2024  
Project ID: 24036892

Test Requested: **3002, Asbestos in Bulk Samples**  
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
DRY1	24036892-1	100	Off-White/Multicolored Drywall	ND		10 CELL,FG	90	G	N
DRY2	24036892-2	100	Off-White/Multicolored Drywall	ND		10 CELL,FG	90	G	N
CALK1	24036892-3	100	Gray Caulk with Blue/Multicolored Paint	ND			100	C,B	N
CALK2	24036892-4	100	White Caulk with Blue/Multicolored Paint	ND			100	C,B	N
TAR1	24036892-5	100	Black Resinous Tar with Brown/Multicolored Resinous Material	ND			100	T,B,C	N
TAR2	24036892-6A	45	Silver Resinous Material	CHRY	4	2 CELL	94	T,B	N
	24036892-6B	55	Black Resinous Tar with Brown/Multicolored Resinous Material	ND			100	T,BC	N

  
Piper-Lenore Murphy  
Laboratory Analyst

  
Emily Thompson  
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	



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Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

**General Notes**

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given.
- Analysis of these materials should be performed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distinguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

**Notes Required by NVLAP**

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

## **Attachment C**



Drywall.



Calking.



Tar roofing.



9/18/24 m. Bartell.

# 62 West Acres Drive

Asbestos inspection

Legend



Google Earth

60 ft





# ASBESTOS - RENOVATION AND DEMOLITION

## ***Are you Remodeling, Renovating or Demolishing?***

You may be subject to State and Federal Regulations requiring an inspection for asbestos.

Avoid penalties and delays: If you are impacting greater than the trigger levels of suspect asbestos-containing materials ("ACM") – you must have your project inspected for ACM by a Colorado-certified asbestos building inspector before commencing work.

## ***It is Dangerous and Illegal to Improperly Disturb ACM!***

Asbestos can be found in these and many other common building materials: Ceiling textures, vinyl floor coverings and mastic, boiler and pipe insulation, heating and cooling duct insulation, ceiling tile, roofing products, clapboard shingles, etc. These materials may be regulated - a certified asbestos building inspector can determine which materials contain asbestos and which are regulated.

## ***For ALL Renovation Projects:***

- Buildings of **any** age may contain ACM; even those newly built may have ACM.
- **Inspection:** If the structures/components to be disturbed exceed the trigger levels, they **must be inspected for asbestos** by a Colorado-certified asbestos building inspector, unless the building was built after October 12, 1988, **AND** the architect or engineer who built it signs and submits documentation showing that no ACM was specified or used in the construction of the building – then no inspection is needed. Asbestos Consulting Firms and asbestos building inspectors can be found in the yellow pages of most telephone books under the heading "Asbestos Consulting and Testing" or go to our web site for a current list: [www.colorado.gov/cdphe/asbestos](http://www.colorado.gov/cdphe/asbestos).
- If the amount of ACM to be disturbed exceeds the following trigger levels, then an asbestos abatement contractor must remove the material:
  - **Single-Family Residential Dwellings ("SFRD")** - the trigger levels are: 50 linear feet on pipes; 32 square feet on other surfaces; or the volume equivalent of a 55-gallon drum.
  - **Public and Commercial Buildings** (other than SFRDs) - the trigger levels are: 260 linear feet on pipes; 160 square feet on other surfaces; or the volume equivalent of a 55-gallon drum.
- Under many circumstances, a Colorado-certified General Abatement Contractor (GAC) must remove ACM that is regulated or may become regulated before it is disturbed by renovation or demolition activities. GACs can be found in the yellow pages of most telephone books under the heading, "Asbestos Abatement" or go to our web site for a current list.
- **Notification:** A written application to CDPHE for a notice/permit may be required, along with payment of a fee and a **ten (10) working-day notification period (emergencies may be excluded)** before the removal (abatement) of regulated asbestos-containing materials. **ALL** ACM waste must be disposed of at an approved asbestos waste disposal site – regardless of the quantity or the necessity for a notice/permit.



## ***Demolitions, Destructive Salvage, House Moving***

If you demolish, perform destructive salvage, perform de-construction, burn, destroy, dismantle, dynamite, implode, knock down, level, pull down, pulverize, raze, tear down, wreck all of a structure or structural components, or you move a house, you may be subject to State and Federal regulations **even when there is NO asbestos in the facility**. **Demolition means:** the wrecking or taking out of any load-supporting structural member of a facility together with any related handling operations or the intentional burning of any facility.

### ***For ALL Demolition Projects:***

- **Inspection:** the building or area of the building to be demolished ***must be inspected for asbestos*** by a Colorado-certified asbestos inspector. Asbestos Consulting Firms and asbestos building inspectors can be found in the yellow pages of most telephone books under the heading "Asbestos Consulting and Testing" or go to our web site for a current list:
- **Asbestos Removal** (if necessary) may have to be performed by a Colorado-certified GAC. Removal, in accordance with Regulation No. 8, Part B, is required if the amount of asbestos-containing material that is friable or will become friable during demolition exceeds the trigger levels.
- **A Demolition Notification Application Form** must be submitted to the CDPHE, **even if no asbestos was found during the inspection**, along with payment of a notification fee and a **ten (10) working-day notification period** that is required before the demolition can commence.

### ***During Demolition:***

- Recycling of materials, such as concrete or wood, that are bonded or contaminated with asbestos-containing material (ACM), such as floor tile or mastic, is NOT permitted.
- Demolition of a building that has non-friable asbestos-containing vinyl asbestos tile (VAT) or tar-impregnated roofing materials remaining must be completed without causing the asbestos-containing materials to become friable. Concrete floors covered with floor tile shall be removed in large sections if possible. Operations such as crushing, pneumatic jacking, etc. of materials containing asbestos are not permitted.
- When imploding or burning a structure, ALL asbestos-containing material, regardless of type or quantity, **MUST** be removed prior to demolition.

### ***For More Information or Forms, please contact:***

Asbestos Compliance Assistance Group

Phone: (303) 692-3100

Fax: (303) 782-0278

Toll Free: 1-800-886-7689

Web page: <http://www.colorado.gov/cdphe/asbestos>

Email address: [cdphe.asbestos@state.co.us](mailto:cdphe.asbestos@state.co.us)

***Have your project inspected by a Colorado-certified asbestos building inspector before you begin renovation or demolition activities***

**Violation of asbestos regulations can result in monetary penalties and project delays.**