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ACRONYMS

Commonly Used Acronyms

ACBM Asbestos Containing Building Materials

ACM Asbestos Containing Materials

AHERA Asbestos Hazard Emergency Response Act

EPA Environmental Protection Agency

HA Homogeneous Area

HEPA High Efficiency Particulate Air

HVAC Heating Ventilation and Air Conditioning

NESHAP National Emission Standards for Hazardous Air Pollutants

O&M Operations and Maintenance

OSHA Occupational Safety and Health Administration

PCM Phase Contrast Microscopy

PLM Polarized Light Microscopy

RBM Regulated Building Material

TEM Transmission Electron Microscopy

TSI Thermal System Insulation



1.0 INTRODUCTION

The Colorado Department of Transportation retained CTL | Thompson, Inc. (CTL) to perform an asbestos survey and lead based paint sampling of bridge EPC 0091-04.37A located on Elbert Road over Black Squirrel Creek in Elbert, Colorado. A vicinity map is included as Figure 1. The site consists of one steel and asphalt bridge built in 1996. The bridge is approximately 120 feet by 24 feet and is scheduled for renovation. Mr. Weston Short, certified CDPHE Asbestos Inspector #23540, performed the asbestos survey and lead paint sampling on February 28, 2018. We observed and sampled suspect asbestos-containing building materials and lead-based paints on the structure. All observed suspect asbestos containing building materials were sampled in general accordance with AHERA regulations.

2.0 ASBESTOS METHODOLOGY

The purpose of the asbestos inspection was to identify the condition and location of friable and non-friable asbestos materials that are present on the bridge structure.

During the asbestos materials survey, CTL performed the following tasks:

- Inspected accessible areas for suspected asbestos materials;
- Determined friability of suspected asbestos materials by touching;
- Developed a sampling plan for each material based on the homogeneous material type, friability, accessibility, and material locations;
- Assessed the condition and potential hazards of the suspected asbestos materials;
- Collected samples of suspected homogeneous and non-homogeneous materials and submitted them for laboratory analysis by Polarized Light Microscopy (PLM); and,
- Documented findings and inspection protocol in accordance with accepted industry standards.

3.0 ASBESTOS INSPECTION PROCEDURE

Homogeneous suspect asbestos materials were identified by visually inspecting the topside and underneath the bridge.

Based on our inspection, the following types of suspect asbestos-containing materials were identified:

Miscellaneous

Caulking – 1 Sample

The inspection did not involve destructive observation methods. There may be areas warranting further investigation. If additional suspect materials are encountered during the demolition, CTL should be contacted for additional sampling.

3.1 Asbestos Sample Collection

CTL collected bulk samples of the suspected friable and non-friable (that would become friable during demolition) asbestos materials in a random and representative manner as defined by the U.S. Environmental Protection Agency (EPA) statistical sampling methods. The collected samples were packaged in sealed and labeled containers.

3.2 <u>Asbestos/Lead Sample Analysis</u>

The bulk samples of suspected asbestos and lead materials were submitted to Reservoirs Environmental for analysis. Reservoirs Environmental is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) (Lab Code 101896-0) and the American Industrial Hygiene Association (AIHA) (Accreditation Certificate #480).



Individual layers of the samples were analyzed by PLM (Polarized Light Microscopy) to determine asbestos type and content. Unused portions of the samples were archived for 60 days, unless the client requested special handling. By regulation, any single positive asbestos sample classifies the entire homogeneous material as asbestos-containing and additional analysis is not required.

4.0 ASBESTOS REGULATORY CRITERIA

According to the Occupational Safety and Health Administration (OSHA), the Environmental Protection Agency (EPA), and the Colorado Department of Public Health and Environment (CDPHE), samples with asbestos concentrations greater than 1 percent are classified as asbestos containing materials and are a regulated material. If a structure is scheduled for renovation or demolition, friable samples that contain *Trace* amounts of asbestos (1% or less) must be further analyzed by a more accurate point-count analysis to determine if they exceed the 1 percent threshold, or the materials must be assumed to contain asbestos and be classified as a regulated material.

The EPA and OSHA distinguish between friable and non-friable forms of asbestos materials. Friable materials can be crumbled or reduced to powder by hand pressure when dry. Non-friable materials cannot be crumbled, pulverized, or reduced to powder by hand pressure when dry. Friable materials are more likely to be released into the air, especially if impacted or damaged during normal use, renovation, or demolition of a structure. Therefore, the distinction between friable and non-friable asbestos materials is important. The EPA further segregates non-friable asbestos materials into Category I or Category II. Category I non-friable asbestos materials include floor tiles and roofing felts. Removal of these asbestos materials is not required prior to demolition as long as they are in good condition and not friable and/or rendered friable. Category II asbestos materials are all other non-friable asbestos materials, and may be required to be removed prior to demolition if those materials will be rendered friable.

Whether removed or remaining in a structure during demolition, the confirmed or presumed asbestos materials are subject to EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) and OSHA regulations. In 40 CFR 61.145, NESHAP requires that each owner or operator of a demolition activity provide the administrator with written notice of intent. The CDPHE has implemented the NESHAP program.

5.0 ASBESTOS INSPECTION RESULTS

Results of the asbestos analyses for the homogenous materials collected from the bridge are summarized below. Laboratory reports for the samples are presented in Appendix B and results are summarized on Table 1.

CTL collected one (1) sample of suspect asbestos-containing building materials from the bridge. As shown on the attached laboratory reports, the sample did not contain asbestos.

6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 Asbestos

Asbestos containing materials are regulated by the Colorado Department of Public Health and Environment (CDPHE), the U.S. Environmental Protection Agency (EPA), and the Occupational Safety and Health Administration (OSHA). However, no asbestos containing materials were identified on the bridge.

6.2 Lead Containing Paint

Since the bridge is planned for remodel or demolition and the non-metal building waste may be placed in a landfill, we conducted sampling for lead containing paint. One (1) brown paint was observed on the steel beams supporting the bridge and was found



to contain less than 19 ppm lead. Given that the paint is located on a metallic substrate and it is assumed that metallic materials will be recycled, no TCLP sample was taken.

Note: Any contractor disturbing lead containing materials must comply with OSHA 29 CFR 1926.62 Lead in Construction Standard.

If we can be of further service discussing the contents of this report, please call us.

Very truly yours,

CTL | THOMPSON, INC.

Weston Short

Certified Asbestos Inspector #23540

Reviewed by:

Matthew L. Wardlow, P.E.

Matthew Wardlow

Environmental Department Manager

WS:MLW/ot

Via ftp site



SUMMARY OF FEDERAL AND STATE ASBESTOS REGULATIONS

OSHA: U.S. Department of Labor, Occupational Safety, and Health Administration, including but not limited to:

- Occupational Exposure to Asbestos, Tremolite, Anthophyllite, and Actinolite;
- Final Rules Title 29, Part 1910, Section 1325 and Part 1926, Section 1101 of the Code of Federal Regulations;
- Respiratory Protection Standard Title 29, Part 1910, Section 134 of the Code of Federal Regulations;
- Construction Industry Title 29, Part 1926, of the Code of Federal Regulations;
- Access to Employee Exposure and Medical Records Title 29, Part 1910, Section 2 of the Code of Federal Regulations;
- Hazard Communication Title 29, Part 1926 Section 59 of the Code of Federal Regulations; and
- Specifications for Accident Prevention Signs and Tags Title 29, Part 1910, Section 145 of the Code of Federal Regulations.

DOT: U.S. Department of Transportation, including but not limited to:

 Hazardous Substances Title 29, Part 171 and 172 of the Code of Federal Regulations.

EPA: U.S. Environmental Protection Agency, including but not limited to:

- Asbestos Hazard Emergency Response Act (AHERA) Regulation;
- Asbestos Containing Materials in Schools Final Rule & Notice Title 40, Part 763 Sub-part E of the Code of Federal Regulations;
- Training Requirements of (AHERA) Regulation;
- Asbestos Containing Materials in Schools Final Rule & Notice Title 40, Part 763, Sub-part E, Appendix C of the Code of Federal Regulations:
- National Emission Standard for Hazardous Air Pollutants (NESHAPS); and



National Emission Standard for Asbestos Title 40, Part 61, Sub-part A, Sub-part M (Revised Sub-part B) of the Code of Federal Regulations.

CDPHE: Colorado Department of Public Health and Environment, including but not limited to:

- Air Quality Control Commission, Regulation No. 8, Part B "Emissions Standards for Asbestos"; and
- Hazardous Materials and Waste Management Division, 6 CCR 1007-2, Section 5 "Asbestos Waste Management."

ASBESTOS RESULTS FOR HOMOGENOUS MATERIALS

HOMOGENEOUS MATERIAL	HOMOGENEOUS GENERAL IDENTIFIER LOCATION		MATERIAL TYPE	DESCRIPTION	SAMPLE HEIGHT	ASBESTOS CONTENT	FRIABLE	AHERA RATING*	ESTIMATED QUANTITY
Caulking	P-CK	EPC 0091-04.37A	MISC	Gray Foamy Material	Bridge Surface	ND	NO	NA	200 SF

Physical Assessment Categories (PAC):

- 1. Damaged or significantly damaged thermal system insulation (TSI) ACBM
- 2. Damaged friable surfacing ACBM
- 3. Significantly damaged friable surfacing ACBM
- 4. Damaged or significantly damaged friable miscellaneous ACBM
- 5. ACBM with potential for damage
- 6. ACBM with potential for significant damage
- 7. Any remaining friable ACBM or friable suspected ACBM

Color Indicators:

Red Type: Asbestos Containing Material (>1% Asbestos)

Blue Type: Trace Asbestos (<1% Asbestos)

Black Type: No Asbestos Detected (ND)

Note: If one sub-sample of a homogeneous area/material contains asbestos, the entire homogeneous material should be assumed to also contain asbestos.



LEAD PAINT SAMPLE RESULTS

SAMPLE ID	MATERIAL/SUBSTRATE	COLOR	SAMPLE LOCATION	LEAD CONTENT (PPM)
P-Brown	METAL	Brown	EPC 0091-04.37A	< 19 (BRL)

KEY:

Green Type: Exceeds 20 x TCLP (100ppm)

BRL: Below Recordable Limits

Note: If one sub-sample of a homogeneous area/material contains lead, all other similar painted substrates









APPENDIX A SITE PHOTOGRAPHS



Description: Bridge Deck Direction: North



Description: Bridge Underside Direction: South



Description: Bridge Abutment (P-Brown, <19ppm Lead) Direction: NA



Description: Core Inspection Direction: NA



SITE PHOTOGRAPHS

CDOT BRIDGE EPC 0091-04.37A February 28, 2018



APPENDIX B ASBESTOS LABORATORY RESULTS AND CHAIN OF CUSTODY



March 6, 2018 Subcontract Number: NA

Laboratory Report: RES 402584-1 Project # / P.O. # DN47215.081-221

Project Description: Asb

Wes Short CTL/Thompson (Denver) 1971 West 12th Place Denver CO 80204

Dear Customer,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code 101896-0 for Transmission Electron Microscopy (TEM) and Polarized Light Microscopy (PLM) analysis and the American Industrial Hygiene Association (AIHA), Lab ID 101533 - Accreditation Certificate #480 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Reservoirs Environmental, Inc. has analyzed the following samples for asbestos content as per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the attached analysis table. The results have been submitted to your office.

RES 402584-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely,

Jeanne Spencer

Elisa Mari for

President

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 402584-1

Client: CTL/Thompson (Denver)

Client Project Number / P.O.: **DN47215.081-221**

Client Project Description: Asb

Date Samples Received: March 05, 2018

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: 24 Hour

Date Samples Analyzed: March 06, 2018

ND=None Detected
TR=Trace, <1% Visual Estimate
Trem/Act=Tremolite/Actinolite

Client	Lab	L		Asbestos Content	Non	_
Sample Number	ID Number	A Y Physical	Sub Part	Mineral Visual	Asbestos Fibrous	Fibrous Components
		E Description		Estimate	Components	·
		R	(%)	(%)	(%)	(%)
W-CK	EM 2037023	A Gray foam	100	ND	0	100
P-CK	EM 2037024	A Black resinous material	100	ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

Ryleigh Jacobs

Analyst / Data QA

Due Date: 3. 6.18 Due Time:

RES 402584

REILAB RESERVOIS ENVIRONMENTAL, INC. 5801 Logan St. Denver, CO 80216 · Phr: 303 964-1986 · Fax 303-477-4275 · Toll Free: 866 RESI-ENV After Hours Cell Phone: 720-339-9228 CONTACT INFORMATION: INVOICE TO: (IF DIFFERENT) SUBMITTED BY: Wes Short 303 626 7842 CTL Thompson Denver Contact: Company: Phone: Address:

Final Dista Distance and one P.O. # D. V. 47.215. O. 81 – 221 Final Dista Distance Email Address: Which T. W. C. T. T. HOMPSON COM. ASSESTOS LAGORATORY HOURS: Weekdays: 7am -7pm & Sat. 8am - 5pm Redule Short P.O. # D. V. ALID MATRIX CODES LAB NOTES: **PLAY PROPERTY New Day STANDARD (3-5 Day) (Rush P.O. # 24 hr. # 3 day 5 Day **Prior notification is required for RUSH 24 hr. # 3 day 5 Day MICROBIOLOGY LABORATORY HOURS: Weekdays: 9am -6pm Ecoli and/or Colliforns* 24-48 Hour Microbial Growth* 5-10 Day **Immarcundis** 5-10 Day Microbial Growth* 5-10 Day **Immarcundis** 5-10 Day **Microbial Growth* 5-10 Day **Immarcundis** 5-10 Day **Microbial Growth* 5-10 Day **Immarcundis** 5-10 Day **Immarcundis** 5-10 Day **Microbial Growth* 5-10 Day **Immarcundis** 5-10 Day	Denver Co 80204					Cell	/pager:							Cell	pager:			
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NOTE: REI will analyze incoming samples based upon information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall constitute an analytical services agreement with payment terms of NET 30 days, failure to comply with payment terms may result in a 1.5% monthly interest surcharge.

Relinquis	ry Use Only	Irabeth Wu	Date/	Time: 3 5 1	8 3:	Date/	Carrier: Hand / FedEx / UPS / USF Box / Courier		ample Condition: emp. (F°)	On Ice Yes / No	Sealed Intact Yes / No Yes / No
Data Entry	Contact	Phone Email Fax	Date	Time	Initials	Contact	Phone Email Fax	Date		Гime	Initials
QA:	Contact	Phone Email Fax	Date	Date Time In		Contact	Phone Email Fax	Date		Γime	Initials



APPENDIX C LEAD LABORATORY RESULTS AND CHAIN OF CUSTODY



March 6, 2018

Laboratory Code: RES Subcontract Number: NA

Laboratory Report: RES 402585-1 Project # / PO #: DN47215.081-221

Project Description: Paint

Wes Short CTL/Thompson (Denver) 1971 West 12th Place Denver CO 80204

Dear Customer,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the American Industrial Hygiene Association, Lab ID 101533 - Accreditation Certificate #480. The laboratory is currently proficient in both IHPAT & ELPAT programs respectively.

Reservoirs has analyzed the following sample(s) using Atomic Absorption Spectroscopy (AAS) / Atomic Emission Spectroscopy - Mass Spectrometry (ICP-MS) per your request. Reported sample results were not blank corrected. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results have been sent to your office.

RES 402585-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those authorized by the client. The results described in this report only apply to the samples analyzed. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you should have any questions about this report, please feel free to call me at 303-964-1986.

Sincerely,

Jeanne Spencer

President

RESERVOIRS ENVIRONMENTAL, INC.

5801 Logan St., Suite 100 Denver CO 80216

TABLE ANALYSIS: LEAD IN PAINT

RES Job Number: RES 402585-1

Client: CTL/Thompson (Denver)

Client Project Number / P.O.: DN47215.081-221

Client Project Description: Paint

Date Samples Received: March 5, 2018

Analysis Type: USEPA SW846 3050B / AA (7420)

Turnaround: 24 Hour
Date Samples Analyzed: March 6, 2018

Client ID Number	Lab ID Number	Reporting Limit	LEAD CONCENTRATION
		(%)	(%)
C-Silver	EM 2037025	0.0013	0.0021
P-Brown	EM 2037026	0.0019	BRL
W-Green	EM 2037027	0.0026	7.3

^{*} Unless otherwise noted all quality control samples performed within specifications established by the laboratory.

Analyst / Data QA: Renee A. Cortez

Due Date: 3 - (Due Time:

SUBMITTED BY:

RES 402585

CONTACT INFORMATION:

REILAB RESELVOIS ENVIRONMENTAL, INC. 5801 Logan St. Denver, CO 80216 • Ph: 303 964-1986 • Fax 303-477-4275 • Toll Free: 866 RESI-ENV After Hours Cell Phone: 720-339-9228

INVOICE TO: (IF DIFFERENT)

Company:	TI -sea Deadle	0	Company:				Con	tact:	les	Shol					C	ontact:			
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	nteed. Additional fees apply for afte	rhours, weekends	and holidays.**	not Short report,	AHERA, Level II, 7402 Semi-Quant, Micro-vac,	7400A, 7400B, OSHA - Total, Respirable	ST	ICS atho	O157:H7, Listeria, S Quantification E.coli and/or Colifor	icro	Legionella:	Other: old: Spo	ER.	> 0	S	aine		T	EM Number
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APPENDIX C CTL | THOMPSON CERTIFICATIONS



Colorado Department of Public Health and Environment

ASBESTOS CERTIFICATION*

This certifies that

Weston Short

Certification No.: 23540

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued:

February 22, 2018

Expires:

March 01, 2019

* This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.

Authorized APCD Representative



Colorado Department of Public Health and Environment

ASBESTOS CONSULTING FIRM

This certifies that

CTL/Thompson

Registration No.: ACF - 14870

has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued:

January 30, 2017

Expires:

January 30, 2018

Authorized APCD Representative

SEAL