



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

Ref: 8SEM-EMR

**ACTION MEMORANDUM AMENDMENT # 1**

**SUBJECT:** Request for a Ceiling Increase for an Emergency Removal Action at the Broadway Hotel Site, City of Toole, Toole County, Utah

**FROM:** Valeriy Bizyayev  
Federal On-Scene Coordinator

**THRU:** Kerry Guy, Acting Chief  
Response Section

Deirdre Rothery, Chief  
Emergency Management Branch

**TO:** Betsy Smidinger, Director  
Superfund and Emergency Management Division

Site ID: B8B4

**I. PURPOSE**

The purpose of this Action Memorandum Amendment is to request a ceiling increase to continue the emergency removal action described herein for the Broadway Hotel Site (Site) located in the City of Toole, Toole County, Utah. This Action Memorandum Amendment also provides the rationale for the increased estimated costs for the emergency removal action.

The initial Emergency Removal Action, as outlined in the February 9, 2022, Action Memorandum (AM) (copy attached as Attachment 1), was initiated to address the cleanup and proper disposal of debris from a former hotel known to contain friable asbestos containing material. The Site was identified by the City and County as a safety concern, posing a potential asbestos exposure threat to nearby residents and community members. Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR § 300.415(b) of the National Contingency Plan (NCP).

During the initial emergency removal action planning and mobilization of resources, costs associated with the transportation and disposal of the asbestos containing materials and demolition debris were discovered to be significantly higher than initially anticipated. Therefore, an additional \$390,000 will be needed.

This emergency removal action will continue to address the cleanup and proper disposal of the ACM-contaminated debris at Site. Conditions existing at the Site continue to present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the National Contingency Plan (NCP).

This emergency removal action is considered nationally significant or precedent-setting because it involves asbestos as the principal contaminant of concern. This removal action will not establish any precedent for how future response actions will be taken and will not commit the U.S. Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.

## **II. SITE CONDITIONS AND BACKGROUND**

Site Name:	Broadway Hotel Site
Superfund Site ID (SSID):	B8B4
NRC Case Number:	N/A
SEMS Number:	UTN000821106
Site Location:	Toole, Toole County, Utah
Lat/Long:	40.5330483710907/ -112.288252629078
National Priorities List (NPL) Status:	Non-NPL
Expected Removal Start Date:	February 8, 2022

### **A. Site Description**

#### **1. Removal Site Evaluation**

The City of Toole and Toole County approached an EPA On-Scene Coordinator about a property with a debris pile containing asbestos containing material (ACM). Based on the report, the OSC conducted a visual assessment of the area and debris pile to confirm concerns expressed by the local officials. The OSC was able to verify a large debris pile with lax security measures and visual signs of trespassing or scavenging. A report provided by the PRP confirmed ACM and was visually verified by the OSC.

The EPA mobilized OSCs along with ERRS and START contractors to assist the EPA and to conduct removal activities as identified in the original Action Memorandum dated February 9, 2022 (Attachment 1).

#### **2. Physical Location**

See original Action Memorandum dated February 9, 2022 (Attachment 1).

### **3. Site Characteristics**

See original Action Memorandum dated February 9, 2022 (Attachment 1) for the original site characteristics that led to the initiation of the Emergency Removal Action.

### **4. Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant or Contaminant**

See original Action Memorandum dated February 9, 2022 (Attachment 1) for details pertaining to the ACM and debris pile.

### **5. NPL Status**

This Site is neither on nor currently being considered for inclusion on the NPL.

### **6. Maps, Pictures, Other Graphic Representations.**

See original Action Memorandum dated February 9, 2022 (Attachment 1) for original details, photos, and representation of the Site.

## **B. Other Actions to Date**

### **1. Previous Actions**

There have been no previous actions at this site.

### **2. Current Actions**

The EPA and contractors have begun preparing to mobilize crews, equipment, and other response resources to the Site. During the initial emergency removal action planning, costs associated with the transportation and disposal of the asbestos containing materials and demolition debris were discovered to be significantly higher than initially anticipated. Thereby, the need for an increase in the Action Memorandum ceiling.

## **C. State and Local Authorities' Roles**

### **1. State and Location Actions to Date**

See original Action Memorandum dated February 9, 2022 (Attachment 1).

### **2. Potential for Continued State/Local Response**

See original Action Memorandum dated February 9, 2022 (Attachment 1).

## **III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND**

## **STATUTORY AND REGULATORY AUTHORITIES**

The original Action Memorandum cited the following 40 CFR 300.415(b)(2) removal criteria as justification for the initiation of the response action. Conditions described in the original action memo still exist or have not been fully addressed to reduce the human health and environmental risk posed at the Site. The EPA has considered all factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors remain at the Site as cited from the original Action Memorandum.

- (i) “Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants;”
- (iv) “High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;”
- (v) “Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or release”
- (vii) “The availability of other appropriate federal or state mechanisms to respond to the release;”

See original Action Memorandum dated February 9, 2022 (Attachment 1) for more details.

## **IV. EXEMPTION FROM STATUTORY LIMITS**

No exemptions from statutory limits are being requested at this time.

## **V. PROPOSED ACTIONS AND ESTIMATED COSTS**

### **A. Proposed Actions**

#### **1. Proposed Action Description**

The EPA plans to complete the emergency removal action as described in the original Action Memorandum dated February 9, 2022, with no additional scope changes.

#### **2. Contribution to Remedial Performance**

The actions will, to the extent practical, contribute to any long-term remedial action at the Site. However, no further federal action is anticipated at this time.

#### **3. Engineering Evaluation/Cost Analysis (EE/CA)**

An EE/CA is not required for an emergency or time-critical removal action.

#### **4. Applicable or Relevant and Appropriate Requirements (ARARs)**

Emergency response actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. The EPA OSC has

requested ARARs from the State of Utah Department of Environmental Quality but no ARARs have been identified by the State. In accordance with the NCP, all ARARs for the Site will be attained to the extent practicable given the scope of the project and the urgency of the situation.

## 5. Project Schedule

See original Action Memorandum dated February 9, 2022 (Attachment 1).

## B. Estimated Costs\*

Tasks	Current AMA Ceiling	Proposed Increase	Proposed Ceiling
ERRS	\$310,000	<b>\$315,000</b>	<b>\$625,000</b>
START	\$40,000	<b>\$10,000</b>	<b>\$50,000</b>
Contingency	(16%) \$60,000	<b>(20%) \$65,000</b>	<b>(18%) \$125,000</b>
<b>Total</b>	<b>\$410,000</b>	<b>\$390,000</b>	<b>\$800,000</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

## VI. EXPECTED CHANGES IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at the Site would increase the actual or potential threats to the public health and/or the environment associated with the release of friable asbestos from the properties that compose the Site.

## VII. OUTSTANDING POLICY ISSUES

Removals involving asbestos as a principal contaminant are one of seven categories designated as nationally significant or precedent-setting. Due to the need to respond immediately, the Office Director of OEM was notified on February 8, 2022, as required by the Superfund Removal Guidance for Preparing Action Memoranda. No further actions are required at the Site following the completion of this emergency removal action.

## VIII. ENFORCEMENT

An investigation to evaluate potential enforcement options may be undertaken. A separate Enforcement Addendum will be prepared if appropriate providing a confidential summary of potential enforcement activities.

## IX. RECOMMENDATION

This decision document represents the selected removal action for the Broadway Hotel Site, in the City of Toole, Toole County, Utah, developed in accordance with CERCLA as amended, and

is not inconsistent with the NCP. This decision is based on the administrative record for the Broadway Hotel Site.

Conditions at the Broadway Hotel Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed increase of \$390,000 from the previous project ceiling of \$410, 000. The total project ceiling, if approved, will be \$800,000. This amount will be funded from the EPA Regional removal allowance.

**Approve:** BETSY SMIDINGER Digitally signed by BETSY SMIDINGER  
Date: 2022.02.16 15:53:56 -07'00' **Date:** \_\_\_\_\_  
Betsy Smidinger, Director  
Superfund and Emergency Management Division

**Disapprove:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
Betsy Smidinger, Director  
Superfund and Emergency Management Division

**Attachments:**

1. Action Memorandum for the Broadway Hotel Site, approved February 9, 2022.

## Attachment 1

### Action Memorandum for the Broadway Hotel Site, dated February 9, 2022



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1595 Wynkoop Street  
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Ref: 8SEM-EMR

**ACTION MEMORANDUM**

**SUBJECT:** Approval and Funding for an Emergency Removal Action at the Broadway Hotel Site, City of Toole, Toole County, Utah

**FROM:** Valeriy Bizyayev  
Federal On-Scene Coordinator

Digitally signed by  
VALERIY BIZYAYEV  
Date: 2022.02.09  
13:53:43 -07'00'

**THRU:** Kerry Guy, Acting Chief  
Response Section

KERRY GUY

Digitally signed by  
KERRY GUY  
Date: 2022.02.09  
13:59:29 -07'00'

Deirdre Rothery, Chief  
Emergency Management Branch

Deirdre  
Rothery

Digitally signed by Deirdre  
Rothery  
Date: 2022.02.09  
14:08:29 -07'00'

**TO:** Betsy Smidinger, Director  
Superfund and Emergency Management Division

Site ID#: B8B4

**I. PURPOSE**

The purpose of this Action Memorandum is to document verbal approval received on February 8, 2022, from the Superfund and Emergency Management Division Director, Betsy Smidinger to initiate the emergency removal action and request and document approval and funding to continue the emergency removal action described herein for the Broadway Hotel Site (Site) located in the City of Toole, Toole County, Utah. This emergency removal action involves the cleanup and proper disposal of debris from a former hotel known to contain friable asbestos containing material. The Site was identified by the City and County as a safety concern, posing a potential asbestos exposure threat to nearby residents and community members. Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR § 300.415(b) of the National Contingency Plan (NCP).

This emergency removal action is considered nationally significant or precedent-setting because it involves asbestos as the principal contaminant of concern. This removal action will not establish any precedent for how future response actions will be taken and will not commit the U.S. Environmental Protection Agency (EPA) to a course of action that could have a significant impact on future responses or resources.



## II. SITE CONDITIONS AND BACKGROUND

Site Name:	Broadway Hotel Site
Superfund Site ID (SSID):	B8B4
NRC Case Number:	N/A
SEMS Number:	UTN000821106
Site Location:	Toole, Toole County, Utah
Lat/Long:	40.5330483710907/ -112.288252629078
National Priorities List (NPL) Status:	Non-NPL
Expected Removal Start Date:	February 2022

### A. Site Description

#### 1. Removal Site Evaluation

The City of Toole and Toole County approached an EPA On-Scene Coordinator about a property with a debris pile containing asbestos containing martial (ACM). Based on the report, the OSC conducted a visual assessment of the area and debris pile to confirm concerns expressed by local officials. The OSC was able to verify a large debris pile with lax security measures and visuals signs of trespassing or scavenging. A report provided by the PRP confirmed ACM and was visually verified by the OSC (Attachment 1 & 2).

The ACM is releasing friable asbestos into the environment at the Site, which is in a residential and mixed-use neighborhood with three primary schools with 0.3-miles. There are no adequate restrictions in place to prevent children or other persons from accessing the Site, posing an asbestos inhalation threat to trespassers and other individuals who enter or live near the Site.

The emergency removal action includes the cleanup and proper disposal of the ACM-contaminated debris. Weather events including wind, rain, and snow will continue to degrade the remaining portions of the structures and debris piles, causing the ACM to release additional asbestos fibers, as the material weathers and becomes friable due to ongoing exposure to the elements. Hence, asbestos fibers will likely migrate off-Site and pose an asbestos inhalation threat to nearby residents and community members.

#### 2. Physical Location

The Site consists of a single property located in the city of Toole, Toole County, Utah. Toole County is a rural county located in northwestern Utah and had a population of 72,698 as of the 2020 census. The City of Toole is the county seat for Toole County and had a population of 35,742 as of the 2020 census. A Site map is provided in Attachment 2. The Site is near the 80<sup>th</sup> percentile of potential Environmental Justice areas regionally and on a state-wide basis.

### **3. Site Characteristics**

The Site consists of a former hotel that experienced a fire and was sequentially demolished by the property owner without any abatement or site controls for asbestos. The debris pile has inadequate site safety measures and no controls to mitigate the release of friable asbestos.

The City of Toole is dry and hot during the summers and dry and cold during the winters. Toole receives on average 20 inches of rain and 84 inches of snow per year. Average daily winds are between 6 miles per hour (mph) and 8 mph. Due to the average winds, precipitation and dry conditions, ongoing weathering is expected to contribute to the continuing release of friable asbestos at the Site, which will likely travel off-Site into the surrounding neighborhoods.

### **4. Release or Threatened Release into the Environment of a Hazardous Substance, or Pollutant or Contaminant**

The known contaminant of concern at the Site is asbestos, which is a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). There has been a release of friable asbestos to the environment from the asbestos-contaminated building materials at the Site. As the remains of the building continue to deteriorate from weather, vandalism, and structural collapse, there is a threat of the additional, future release of asbestos fibers into the environment that then migrate off-Site and pose an asbestos inhalation threat to nearby residents and community members.

Asbestos is a solid material with a variety of forms, including chrysotile, which was found at the Site. Asbestos is highly resistant to heat and has exceptional tensile strength, both of which are characteristics that lend themselves to use in ordinary building materials. Asbestos tends to become brittle over time shattering into fiber bundles due to age and weathering. This characteristic is referred to as being friable. Subsequently, the friable fiber bundles can further degrade into microscopic fibers that can become airborne.

Human exposure to airborne asbestos fibers via inhalation has been proven to cause asbestosis, cancer, mesothelioma, and other respiratory diseases. Hence, there exists a potential for human exposure to asbestos both at the Site and in the surrounding residential areas.

### **5. NPL Status**

This Site is not on the NPL, nor is it currently proposed for inclusion on the NPL.

### **6. Maps, Pictures and Other Graphic Representations**

A Site map is provided in Attachment 2. Site photos are provided in Attachment 3.

**B. Other Actions to Date**

**1. Previous Actions**

There are no previous EPA actions on the Site.

**2. Current Actions**

There are no current activities on the Site.

**C. State and Local Authorities' Roles**

**1. State and Local Actions to Date**

The former structure at the Site has been demolished and is in a debris pile. Officials from the county and the municipalities have made several attempts to have the property owner address the debris pile without success.

Neither the state nor the local authorities have taken actions to remediate the Site.

**2. Potential for Continued State/Tribal/Local Response**

Neither the state, county nor the municipality has sufficient resources to complete the cleanup at this Site in a timely fashion.

**III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES**

Conditions at the Site present a threat to public health and the environment and meet the criteria for initiating a removal action under 40 CFR 300.415(b)(2) of the NCP. EPA has considered all of the criteria under 40 CFR 300.415(b)(2) for each of the properties and have determined the following four criteria apply to each property.

The EPA has considered all the factors described in 40 CFR 300.415(b)(2) of the NCP and determined that the following factors apply at the Site:

“(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants or contaminants:”

The ACM poses a direct threat to public health and welfare because children, trespassers, and other community members could be exposed to the asbestos fibers released from the remains of the structures and scattered throughout the Site. There are no adequate access restrictions at the Site to prevent community members from accessing the Site and encountering potential exposure to the ACM.

“(iv) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate:”

Pieces of ACM are scattered on the ground surface throughout the Site and are present in the remains of the structure at the Site. Asbestos fibers have been released and will continue to be released from the ACM and will migrate into the environment.

“(v) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:”

The debris pile is in poor condition and open to the environment. Weather events including wind, rain, and snow will cause continued degradation of the remaining portions of the structures and debris piles. Asbestos fibers will continue to be released from the ACM as the material weathers and becomes friable due to ongoing exposure to the elements.

“(vii) The availability of other appropriate federal or state mechanisms to respond to the release:”

No other local, state, or federal agency is in the position or has the resources to independently implement a timely, effective response action to address the ongoing threat presented by the Site.

#### **IV. PROPOSED ACTIONS AND ESTIMATED COSTS**

##### **A. Proposed Actions**

###### **1. Proposed Action Description**

The debris pile of the former Hotel contains friable ACM that is releasing asbestos fibers into the environment at the Site.

EPA will remove the fire-damaged former structure and debris pile from the Site. Soils adjacent to the structures and debris piles will be scraped where ACM is observed. The EPA and its contractors will determine which of the building components can be segregated from the ACM during the cleanup process and managed as solid waste for disposal purposes. All cleanup activities that will disturb ACM will be conducted using adequately wet methods to prevent the migration of asbestos fibers.

All ACM will be segregated from non-contaminated debris and each waste stream will be properly disposed at permitted landfills. As a result, no post-removal Site controls are anticipated to be necessary following the removal action.

RCRA requirements concerning waste analysis, manifesting, packaging, and transporting will be adhered to for off-site shipments of hazardous wastes.

###### **2. Contribution to Remedial Performance**

This effort will, to the extent practical, contribute to any future remedial effort at the property. However, no further federal action is anticipated at this time.

### 3. Engineering Evaluation/Cost Analysis (EE/CA)

An EE/CA is not required for a time-critical removal action.

### 4. Applicable or Relevant and Appropriate Requirements (ARARs)

Emergency response actions conducted under CERCLA are required, to the extent practicable considering the exigencies of the situation, to attain ARARs. EPA OSC has requested ARARs from the State of Utah Department of Environmental Quality. In accordance with the NCP, all ARARs for the Site will be attained to the extent practicable given the scope of the project and the urgency of the situation.

### 5. Project Schedule

The removal action is anticipated to begin as soon as possible. All removal activities should be completed within two weeks of the beginning of on-Site activities.

#### B. Estimated Costs\*

	<b>Estimated Costs</b>
ERRS contractor	\$310,000
START Contractor	\$40,000
SUBTOTAL	\$350,000
Contingency Costs (16 % of subtotal)	\$60,000
<b>Total Removal Project Ceiling</b>	<b>\$410,000</b>

\*EPA direct and indirect costs, although cost recoverable, do not count toward the removal ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA.

### V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delay in action or no action at the Site would increase the actual or potential threats to the public health and/or the environment associated with the release of friable asbestos from the properties that compose the Site.

### VI. OUTSTANDING POLICY ISSUES

Removals involving asbestos as a principal contaminant are one of seven categories designated as nationally significant or precedent-setting. Due to the need to respond immediately, the Office Director of OEM was notified on February 8, 2022, as required by the Superfund Removal Guidance for Preparing Action Memoranda. No further actions are required at the Site following the completion of this emergency removal action.

## VII. ENFORCEMENT

An investigation to evaluate potential enforcement options may be undertaken. A separate Enforcement Addendum will be prepared if appropriate providing a confidential summary of potential enforcement activities.

## VIII. RECOMMENDATIONS

This decision document represents the selected removal action for the Broadway Hotel Site, in the City of Toole, Toole County, Utah, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP section 300.415(b) criteria for a removal action, and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$410,000; this amount will be funded from the Regional removal allowance.

APPROVE

Bielenberg,  
Ben

Digitally signed by  
Bielenberg, Ben  
Date: 2022.02.09  
15:47:56 -07'00'

\_\_\_\_\_  
Betsy Smidinger, Director  
Superfund and Emergency Management Division

\_\_\_\_\_  
Date

DISAPPROVE

\_\_\_\_\_  
Betsy Smidinger, Director  
Superfund and Emergency Management Division

\_\_\_\_\_  
Date

### Attachments:

Attachment 1: Site Report  
Attachment 2: Site Map  
Attachment 3: Site Photos

## Attachment 1 Site Report

**ASBESTOS SCOPE-OF-WORK  
(EMERGENCY CLEAN-UP PROCEDURE)  
FOR THE  
BROADWAY HERITAGE VILLAGE  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**



**March 16, 2021**

**Prepared for:**

**Dan Brett  
(801) 834-5737  
danieljbrett@comcast.net**

**Prepared by:**

**David Roskelley, MSPH, CIH, CSP  
State of Utah DAQ ASB #1370  
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47 West 9000 South, Suite #2  
Sandy, Utah 84070  
steve@rrenviro.com  
Phone (801) 318-5658**





## Division 02 - Site Work

### 02 000 General

### 02 080 Hazardous Material Abatement

#### 02 081 Asbestos Abatement

Scope of Work:      Broadway Heritage Village  
                             140 North Broadway  
                             Tooele, Utah 84074

1. Remaining Ruble/Fire Debris Pile, Adjacent Field and Sidewalk Areas,

#### Emergency Clean-Up

The Former Broadway Hotel fire has burned known asbestos containing materials inside the building (See photos in Appendix A). In the course of extinguishing the fire, debris has been washed out of the building and into the adjacent field and sidewalk areas. All visible debris associated with the fire inside and outside the building is considered to contain >1% asbestos. The fire has caused this material to become friable.

- a. Contractor shall establish a three-stage decontamination area located adjacent to the regulated areas. The three-stage decontamination area consists of: equipment room, shower room, and clean room. The shower shall have potable hot and cold water. The three-stage decontamination area shall be used for all entry and exit to the regulated areas.
- b. Contractor shall ensure that asbestos barrier tape will be placed around regulated area. Asbestos warning signs will be posted on all entrances into the regulated area.
- c. All applicable rules will apply including Utah Division of Air Quality (DAQ) Rule R-307.801(Utah Asbestos Rule) and EPA NESHAP (40CFR Part 61, Subpart M)

- d. **Clean-Up Procedure:** The Contractor shall clean all dust and visible debris from the adjacent field and sidewalk areas. All dust and debris shall be properly placed in asbestos bags, leak-tight barrels, or other approved leak tight containers and properly labeled. Contractor will clean and decontaminate (wet wiping and HEPA vacuuming) all contaminated surfaces. The Consultant (R&R Environmental) will visually inspect the area for visible debris.
- e. This work will be performed by properly AHERA accredited and Utah certified asbestos personnel.
- f. Consultant will conduct asbestos air sampling during clean-up operations. Four samples will be taken at the cardinal compass points during clean up. Consultant will perform visual inspection of the entire work area. After the visual inspection meets expectations (no visible debris), Contractor will clear the work area. Utah Division of Air Quality (DAQ) will be notified 24 hours in advance of clearing any area.

## 2. General

- a. **Segregating Materials to be Recycled:** Any building material that may be recycled or wished to not be disposed of as asbestos, must be undergo the following process prior to recycling or being disposed of as construction debris. Material must first be segregated from the rest of the debris. This material must be washed to be visibly dust free. Washing is to include wet wiping and HEPA vacuuming. Once visibly free of dust, the material shall be completely encapsulated using an appropriate encapsulant. This material may then be considered as construction debris and handled/transported accordingly.
- b. Consultant will conduct asbestos air sampling during clean-up operations. Four samples will be taken at the cardinal compass points during clean up. Consultant will perform visual inspection of the entire work area. After the visual inspection meets expectations (no visible debris), Contractor will clear the area. Utah Division of Air Quality (DAQ) will be notified 24 hours in advance of clearing any area.
- c. Contractor shall establish a three-stage decontamination area located adjacent to the regulated areas "zone". The three-stage decontamination area consists of: equipment room, shower room, and clean room. This three-stage decontamination area shall but used for all entry and exit to the regulated work area.
- d. Contractor shall utilize disposable coveralls that include hood and foot coverings.
- e. In all instances, workers should use equipment specifically designed to protect them from asbestos exposures during demolition and handling of debris, especially respirators, as required under OSHA. Contractor and all subcontractors shall use respirators with P100 cartridge HEPA filters and maintain a Respiratory Protection Program for it's employees.
- f. Contractor shall notify DAQ no later than twenty-four hours before the project is complete.

- g. Contractor (TBD) shall attend a pre-start meeting on the first day of the project, and shall ensure that the project supervisor is in attendance.
- h. Contractor shall conduct personal air sampling each day of friable removal activity, and shall submit (in writing) all personal air sampling results from the workers on the project to the Consultant no later than the end of the shift the following work day.
- i. Contractor shall ensure his work does not cause undue interference with the facility operation outside his abatement area, or unsightly accumulations of debris, materials, personal belongings, etc., and that all areas of the work are secure from the unauthorized entry of patrons and employees of the Owner.
- j. Reserved
- k. Contractor shall ensure all equipment brought onto the site is free of suspect asbestos-containing material (ACM). Consultant may disallow use of any equipment with obvious suspect ACM.
- l. All ladders and their components shall be maintained in good repair and fully operational, without makeshift repairs.
- m. Reserved.
- n. Transporter shall provide a certificate of weight and measure (or other certification acceptable to the Consultant) for all ACM waste taken from the site. The certification shall list gross, tare and net weights for all ACM waste. Transporter shall also provide, on Transporter's letterhead, a listing of each manifest used for the project, by number and waste tonnage (in pounds) specific to that manifest. Listing shall show if ACM was disposed of as regulated waste, non-hazardous or any other state-approved category of waste. This information shall be provided prior to, or at the time of invoice submission.

- o. Smoking is not allowed on the Owner's property except in designated smoking areas. Contractor's employees who smoke shall do so in designated areas and shall police and clean up any cigarette butts or associated debris, transporting this waste immediately to their privately-owned vehicle or a company vehicle. Owner's trash receptacles shall not be used for this waste. Any violation of this provision is grounds for expulsion of the offending party from the work site for its duration.
- p. The most stringent regulations in effect for the work site shall apply. Contractor shall determine the extent of city, county, AQMD, state, federal and all other applicable regulations and perform the work in compliance with these regulations.
- q. Reserved.
- r. Contractor shall provide the Industrial Hygiene Consultant with MSDSs for all materials used on their work site. MSDSs shall be provided prior to the use of the product.
- s. Contractor shall provide an English-speaking interpreter on-site any time Contractor personnel are non-English-speaking.
- t. Contractor's electrical extension cords shall be suspended off the floor or ground or covered with trip-resistant covering. GFCIs shall be used on all electrical equipment.
- u. Removed ACM shall be cleaned up and containerized on a continual basis. No removed ACM shall be left unattended at any time until placed in the container, roll-off dumpster, or dump trailer. All waste shall be disposed of at an in-state waste facility unless agreed to in writing by the Consultant prior to transport. Contractor shall use a waste container that can be made secure from unauthorized disposal, so no extraneous waste is included with the ACM waste generated by Contractor. All ACM waste shall be transported in leak-tight containers, in poly-lined dump trailers, or locked vehicles, separate from non-ACM material.
- v. Contractor shall maintain a job telephone at Contractor's expense. Telephone shall be operational prior to disturbance of any ACM. Contractor shall be fully responsible for

all charges to this telephone.

w. Reserved

x. All dimensions, quantities and areas provided in this scope of work are approximations to assist Contractor in determining the amount of ACM designated for removal. Contractor is entirely responsible for accurately determining the amount of ACM included in the scope of work.

## APPENDIX A

### PHOTO LOG



**PHOTO 1- Broadway Heritage Village Site**



**PHOTO 2- Thermal System Insulation "Aircell" debris contains asbestos**



**PHOTO 3- Rolled vinyl flooring debris contains asbestos**



**PHOTO 4- Thermal System Insulation "Aircell" debris contains asbestos (wrapped in plastic sheeting)**

## **R & R Environmental, Inc.**

47 West 9000 South, Suite #2, Sandy, Utah 84070  
(801) 352-2380 • Fax: (801) 352-2381

PROJECT NO:

DESIGNED BY:

SCALE:

REVIEWED BY:

DRAWN BY:

DATE:

FILE:

## **SITE PHOTOGRAPHS**

**ASBESTOS SCOPE-OF-WORK  
(EMERGENCY CLEAN-UP PROCEDURE)  
FOR THE  
BROADWAY HERITAGE VILLAGE  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**





**PHOTO 5- Roofing debris contains asbestos**



**PHOTO 6 – Site overview**

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FOR THE  
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140 NORTH BROADWAY  
TOOELE, UTAH 84074**

## APPENDIX B

### SITE PLANS



Maps

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NOT FOR  
CONSTRUCTION  
PROGRESS  
SET

## **APPENDIX C**

**R&R ENVIRONMENTAL, INC.**

**ASBESTOS SURVEY AND ASSESSMENT**



**AN ASBESTOS SURVEY AND ASSESSMENT  
FOR THE  
BROADWAY HERITAGE VILLAGE  
(FORMER BROADWAY HOTEL)  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**



**March 16, 2021**

**Prepared for:**

**Dan Brett  
(801) 834-5737  
danieljbrett@comcast.net**

**Prepared by:**

**David C. Roskelley, MSPH, CIH, CSP  
State of Utah DAQ ASB #1370  
(AHERA Accredited and Utah Certified Project Designer)  
R & R Environmental, Inc. (R & R) (ASBC-#237)  
47 West 9000 South, Suite #2  
Sandy, Utah 84070  
(801) 541-1035  
dave@rrenviro.com**

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## **TABLE OF CONTENTS**

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- 3. Conclusions and Recommendations
- 4. Signatures & Certifications



# EXECUTIVE SUMMARY

## EXECUTIVE SUMMARY

The Asbestos Survey conducted at the Former Broadway Hotel (destroyed by fire) found the following asbestos-containing materials (ACM) within the areas surveyed:

Material/ Homogenous Area	Distribution	Quantity (ft <sup>2</sup> /LF)	Lab Result (%/Type)	Photo #	Assessment
Thermal System Insulation "Aircell" and Fittings*	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75-80% Chrysotile</b>	2, 4	Poor
Wall Plaster*	Scattered throughout debris	>2,500 ft <sup>2</sup>	<b>Trace - 4% Chrysotile</b>	5	Poor
Rolled Vinyl Flooring*	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>Trace - 35% Chrysotile</b>	3	Poor
Roofing Materials (Tar, Underlayment, Sealant*)	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace - 12% Chrysotile</b>	5	Poor

\*Note 1: These materials need to be removed prior to demolition.

R & R Environmental, Inc. (R & R) was contacted to conduct an asbestos survey of the Broadway Heritage Project (Former Broadway Hotel destroyed by fire), Tooele, Utah. The survey consisted of a visual assessment of the site for suspect asbestos containing materials (ACM) and bulk sampling of the materials. The fieldwork component of this survey was conducted in February 2021 by Mr. David Roskelley who is a Utah Accredited Asbestos Building Inspector. This report presents the conditions and observations noted on the visit dates.

### SAMPLING METHODS

Survey procedures were based on those outlined in Title 40 Code of Federal Regulation (CFR) Part 763, USEPA Asbestos Hazard Emergency Response Act, and the Asbestos Model Accreditation Plan (effective April 4, 1994). The procedures included visual observation, physical inspection, bulk sample collection, and condition assessment of suspect ACM. The number of samples collected was based on the amount and accessibility of each homogeneous material, with consideration given for the type, age, and condition.

## NESHAP TABLES

**BROADWAY HERITAGE VILLAGE  
(FORMER BROADWAY HOTEL)  
DATE OF SURVEY: FEBRUARY 2021  
NESHAP - REGULATED  
ASBESTOS-CONTAINING MATERIALS (R-ACM)**

1. Friable asbestos material (>1% asbestos and can be crumbled, pulverized or reduced to powder by hand pressure)
  - ☒ Thermal system insulation (TSI)\*
  - ☐ Textured ceiling material (TCM)\*
  - ☐ Spray-on insulation or fireproofing\*
  - ☐ Blown-in insulation\* (Cinder Block Filler - Vermiculite)
  - ☐ Ceiling tiles\*
  - ☐ Plaster, gypsum board, gypsumboard joint compound\*
  - ☐ Cloth materials\* (HVAC Packing Material)
  - ☐ Paper materials\*
  - ☐ Electrical wiring insulation\*
  - ☐ Sink undercoating (loose)\*
  - ☐ Other\*
2. Category I ACM which has become friable
  - ☐ Packings
  - ☐ Gaskets
  - ☒ Resilient floor coverings (floor tile and sheet vinyl)
  - ☒ Asphalt roofing products
3. Category I ACM that will be or has been subjected to sanding, grinding, cutting or abrading
  - ☐ Packings
  - ☐ Gaskets
  - ☒ Resilient floor coverings (floor tile and sheet vinyl)
  - ☒ Asphalt roofing products
4. Category II ACM that has a high probability of becoming or has become friable in the course of demolition or renovation operations
  - ☒ Asbestos cement materials (transite)\*
  - ☐ Asphalt, tar and rubber-base ACM products other than roofing products\*
  - ☐ Non-asphalt and non-paper roofing products\*
  - ☐ Paint\*
  - ☐ Fire brick and/or mortar\*
  - ☐ Stainless steel sink undercoating (solid)\*
  - ☐ Encapsulated TCM\*
  - ☐ Encapsulated TSI\*
  - ☒ Mastic for floor tile, ceiling tile, cove molding, etc.\*
  - ☐ Other (Heat Shield, Window Putty)

**BROADWAY HERITAGE VILLAGE  
(FORMER BROADWAY HOTEL)  
DATE OF SURVEY: FEBRUARY 2021  
NESHAP NON-REGULATED  
ASBESTOS-CONTAINING MATERIAL (N-R-ACM)**

1.  $\geq$  1% asbestos
2. Category I Non-friable (cannot be crumbled, pulverized, or reduced to powder by hand pressure) ACM with >1% asbestos by new PLM procedure  
☐ Packings  
☐ Gaskets  
☒ Resilient floor coverings (floor tile and rolled vinyl flooring)  
☐ Asphalt roofing products (Silver/Black roof sealant)
3. Category II Non-friable ACM with >1% asbestos by new PLM procedure (Category includes items meeting Category I definition but not specifically listed in that category)  
☐ Asbestos cement materials (transite)\* (Fume hoods)  
☐ Asphalt, tar and rubber-base ACM products other than roofing products\* (Exterior Caulking)  
☐ Non-asphalt and non-paper roofing products\*  
☐ Paint\*  
☐ Fire brick and/or mortar\*  
☐ Sink undercoating (solid)\*  
☐ Mastic for floor tile, ceiling tile, cove molding, etc.\*  
☐ Other\* Fire doors

Notes:

1. (\*) denotes R & R's interpretation of materials included in this category.
2. "New PLM procedure" is outlined in Appendix A, Subpart F, 40 CFR, Part 783, Section 1, Polarized Light Microscopy.
3. The Environmental Protection Agency (EPA) National Emission Standard for Hazardous Air Pollutants (NESHAP) asbestos revision as outlined in 40 CFR, Part 61, became effective November 20, 1990. The asbestos classification system outlined in the revision and included in this section is dynamic in nature. Asbestos materials classified as "NON-REGULATED" at the time of the survey may become "REGULATED" due to ongoing or planned maintenance, renovation or demolition actions which can transform a material containing greater than 1% asbestos from a "non-friable" and NON-REGULATED to a "friable" and REGULATED condition. Classification of ACM in this section and in the executive summary of this report is, therefore, based on the observations of the surveyor at the time of the survey and may or may not be appropriate at later dates.
4. Maintenance, renovation, demolition, weathering, normal wear, water or other damage can alter the "NON-REGULATED" status of materials, and necessitate precautions required for handling them as "REGULATED" asbestos materials.

## **PHOTO LOG**



**PHOTO 1- Broadway Heritage Village Site**



**PHOTO 2- Thermal System Insulation "Aircell" debris contains asbestos**



**PHOTO 3- Rolled vinyl flooring debris contains asbestos**



**PHOTO 4- Thermal System Insulation "Aircell" debris contains asbestos (wrapped in plastic sheeting)**

## **R & R Environmental, Inc.**

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SCALE:

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## **SITE PHOTOGRAPHS**

### **ASBESTOS SCOPE-OF-WORK (EMERGENCY CLEAN-UP PROCEDURE) FOR THE BROADWAY HERITAGE VILLAGE 140 NORTH BROADWAY TOOELE, UTAH 84074**



**PHOTO 5- Roofing debris contains asbestos**



**PHOTO 6 – Site overview**

## **R & R Environmental, Inc.**

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**ASBESTOS SCOPE-OF-WORK  
(EMERGENCY CLEAN-UP PROCEDURE)  
FOR THE  
BROADWAY HERITAGE VILLAGE  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**



## **SAMPLE LOG**

**AN ASBESTOS SURVEY AND ASSESSMENT  
FOR THE  
BROADWAY HERITAGE VILLAGE  
(FORMER BROADWAY HOTEL)  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**

**SAMPLE LOG**

Sample #	Material/ Homogenous Area	Sample Location	Distribution	Quantity (ft <sup>2</sup> /LF)	Lab Result (%/Type)	Assumed (Yes/No)	Assessment
<b>BRHT- 01</b>	Thermal System Insulation Debris	GRID 1	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 02</b>	Thermal System Insulation Debris	GRID 2	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 03</b>	Thermal System Insulation Debris	GRID 4	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>76% Chrysotile</b>	No	Poor
<b>BRHT- 04</b>	Thermal System Insulation Debris	GRID 6	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 05</b>	Thermal System Insulation Debris	GRID 7	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>77% Chrysotile</b>	No	Poor
<b>BRHT- 06</b>	Thermal System Insulation Debris	GRID 8	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 07</b>	Thermal System Insulation Debris	GRID 9	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>80% Chrysotile</b>	No	Poor
<b>BRHT- 08</b>	Rolled Vinyl Flooring Debris	GRID 1	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>35% Chrysotile 3% Chrysotile (Adhesive)</b>	No	Poor
<b>BRHT- 09</b>	Rolled Vinyl Flooring Debris	GRID 3	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>35% Chrysotile Trace Chrysotile (Adhesive)</b>	No	Poor
<b>BRHT- 10</b>	Rolled Vinyl Flooring Debris	GRID 5	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>35% Chrysotile 3% Chrysotile (Adhesive)</b>	No	Poor
<b>BRHT- 11</b>	Rolled Vinyl Flooring Debris	GRID 6	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>20% Chrysotile 3% Chrysotile (Adhesive)</b>	No	Poor
<b>BRHT- 12</b>	Rolled Vinyl Flooring Debris	GRID 8	Scattered throughout debris	>2,900 ft <sup>2</sup>	<b>35% Chrysotile Trace Chrysotile (Adhesive)</b>	No	Poor
<b>BRHT- 13</b>	Plaster Debris	GRID 2	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 14</b>	Plaster Debris	GRID 3	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor

Sample #	Material/ Homogenous Area	Sample Location	Distribution	Quantity (ft <sup>2</sup> /LF)	Lab Result (%/Type)	Assumed (Yes/No)	Assessment
<b>BRHT- 15</b>	Plaster Debris	GRID 4	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 16</b>	Plaster Debris	GRID 5	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 17</b>	Plaster Debris	GRID 7	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 18</b>	Plaster Debris	GRID 8	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 19</b>	Plaster Debris	GRID 9	Scattered throughout debris	>2,500 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 20</b>	Plaster Debris	GRID 9	Scattered throughout debris	>2,500 ft <sup>2</sup>	<b>Trace-4% Chrysotile</b>	No	Poor
<b>BRHT- 21</b>	Roofing Material Debris	GRID 3	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>4-10% Chrysotile</b>	No	Poor
<b>BRHT- 22</b>	Roofing Material Debris	GRID 5	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -10% Chrysotile</b>	No	Poor
<b>BRHT- 23</b>	Roofing Material Debris	GRID 6	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -10% Chrysotile</b>	No	Poor
<b>BRHT- 24</b>	Roofing Material Debris	GRID 7	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -12% Chrysotile</b>	No	Poor
<b>BRHT- 25</b>	Roofing Material Debris	GRID 8	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -10% Chrysotile</b>	No	Poor
<b>BRHT- 26</b>	Roofing Material Debris	GRID 9	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -12% Chrysotile</b>	No	Poor
<b>BRHT- 27</b>	Roofing Material Debris	GRID 9	Scattered throughout debris	>4,000 ft <sup>2</sup>	<b>Trace -4% Chrysotile</b>	No	Poor
<b>BRHT- 28</b>	Rolled Vinyl Flooring Debris	GRID 2	Scattered throughout debris	>1,000 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 29</b>	Rolled Vinyl Flooring Debris	GRID 4	Scattered throughout debris	>1,000 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 30</b>	Rolled Vinyl Flooring Debris	GRID 5	Scattered throughout debris	>1,000 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 31</b>	Rolled Vinyl Flooring Debris	GRID 6	Scattered throughout debris	>1,000 ft <sup>2</sup>	Non Detected	No	Poor
<b>BRHT- 32</b>	Rolled Vinyl Flooring Debris	GRID 7	Scattered throughout debris	>1,000 ft <sup>2</sup>	Non Detected	No	Poor

Sample #	Material/ Homogenous Area	Sample Location	Distribution	Quantity (ft <sup>2</sup> /LF)	Lab Result (%/Type)	Assumed (Yes/No)	Assessment
<b>BRHT- 33</b>	Thermal System Insulation Debris	GRID 1	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 34</b>	Thermal System Insulation Debris	GRID 2	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 35</b>	Thermal System Insulation Debris	GRID 4	Scattered throughout debris	>1,500 ft <sup>2</sup>	<b>75% Chrysotile</b>	No	Poor
<b>BRHT- 36</b>	Wall System Debris	GRID 2	Scattered throughout debris	>3,000 ft <sup>2</sup>	Non-Detected	No	Poor
<b>BRHT- 37</b>	Wall System Debris	GRID 3	Scattered throughout debris	>3,000 ft <sup>2</sup>	Non-Detected	No	Poor
<b>BRHT- 38</b>	Wall System Debris	GRID 4	Scattered throughout debris	>3,000 ft <sup>2</sup>	Non-Detected	No	Poor
<b>BRHT- 39</b>	Wall System Debris	GRID 5	Scattered throughout debris	>3,000 ft <sup>2</sup>	Non-Detected	No	Poor
<b>BRHT- 40</b>	Wall System Debris	GRID 7	Scattered throughout debris	>3,000 ft <sup>2</sup>	Non-Detected	No	Poor

## **LABORATORY ANALYSIS RESULTS**



March 09, 2021

**Subcontractor Number:**

**Laboratory Report:** RES 487034-1

**Project #/P.O. #:** Tooele Broadway Project

**Project Description:** Tooele Broadway Project

Dave Roskelley  
R & R Environmental  
47 West 9000 South #2  
Sandy UT 84070


Dear Dave,

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 487034-1** 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,



by Marian Banker

Jeanne Spencer  
President

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number:  
Client:  
Client Project Number / P.O.:  
Client Project Description:  
Date Samples Received:  
Method:  
Turnaround:  
Date Samples Analyzed:

RES 487034-1

R & R Environmental

Tooele Broadway Project

Tooele Broadway Project

February 26, 2021

EPA 600/R-93/116 - Short Report, Bulk Standard

March 09, 2021

ND=None Detected

TR=Trace, <1% Visual Estimate

Trem/Act=Tremolite/Actinolite

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
				Mineral	Visual Estimate (%)		
01	A	Off white/black fibrous material	100	Chrysotile	75	0	25
02	A	Brown/off white fibrous material	100	Chrysotile	75	0	25
03	A	Off white/brown fibrous material	100	Chrysotile	76	0	24
04	A	Off white fibrous material	100	Chrysotile	75	0	25
05	A	Off white/brown fibrous material	100	Chrysotile	77	0	23
06	A	Brown/off white fibrous material	100	Chrysotile	75	0	25
07	A	Off white/brown fibrous material	100	Chrysotile	80	0	20
08	A	Tan adhesive	15	Chrysotile	3	0	97
	B	Beige/multi-colored sheet vinyl w/ off white fibrous backing material	85	Chrysotile	35	5	60
09	A	Tan adhesive	15	Chrysotile	TR	0	100
	B	Beige/multi-colored sheet vinyl w/ off white fibrous backing material	85	Chrysotile	35	5	60

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

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 487034-1

Client: R & R Environmental

Client Project Number / P.O.: Tooele Broadway Project

Client Project Description: Tooele Broadway Project

Date Samples Received: February 26, 2021

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

Turnaround: Standard

Date Samples Analyzed: March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
				Mineral	Visual Estimate (%)		
10	A	Tan adhesive	10	Chrysotile	3	0	97
	B	Beige/multi-colored sheet vinyl w/ off white fibrous backing material	90	Chrysotile	35	5	60
11	A	Tan adhesive	10	Chrysotile	3	0	97
	B	Beige/multi-colored sheet vinyl w/ off white fibrous backing material	90	Chrysotile	20	5	75
12	A	Tan adhesive	15	Chrysotile	TR	0	100
	B	Beige/multi-colored sheet vinyl w/ off white fibrous backing material	85	Chrysotile	35	5	60
13	A	White plaster	30		ND	0	100
	B	Off white granular plaster	70		ND	5	95
14	A	Off white granular plaster	35		ND	4	96
	B	White plaster	65		ND	0	100

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



RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 487034-1

Client: R & R Environmental

Client Project Number / P.O.: Tooele Broadway Project

Client Project Description: Tooele Broadway Project

Date Samples Received: February 26, 2021

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

Turnaround: Standard

Date Samples Analyzed: March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
				Mineral	Visual Estimate (%)		
15	A	White plaster	35		ND	0	100
	B	Off white granular plaster	65		ND	5	95
16	A	White plaster	30		ND	0	100
	B	Off white granular plaster	70		ND	4	96
17	A	White plaster	25		ND	0	100
	B	Off white granular plaster	75		ND	5	95
18	A	White plaster	35		ND	0	100
	B	Off white granular plaster	65		ND	5	95
19	A	White plaster	30		ND	0	100
	B	Off white granular plaster	70		ND	5	95

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

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number:  
Client:  
Client Project Number / P.O.:  
Client Project Description:  
Date Samples Received:  
Method:  
Turnaround:  
Date Samples Analyzed:

RES 487034-1  
R & R Environmental  
Tooole Broadway Project  
Tooole Broadway Project  
February 26, 2021  
EPA 600/R-93/116 - Short Report, Bulk  
Standard  
March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non- Asbestos Fibrous Components (%)	Non- Fibrous Components (%)
				Mineral	Visual Estimate (%)		
20	A	Black charred paint	6		ND	0	100
	B	Cream paint w/ a trace of white compound	7	Chrysotile	TR	0	100
	C	White compound	10	Chrysotile	4	0	96
	D	Tan/multi-colored fibrous material	77		ND	85	15
21	A	Silver paint	15	Chrysotile	4	0	96
	B	Black tar	25		ND	0	100
	C	Black resinous tar	60	Chrysotile	10	0	90
22	A	Silver paint	15	Chrysotile	6	0	94
	B	Black tar	35		ND	0	100
	C	Black resinous tar	50	Chrysotile	10	0	90

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

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

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Date Samples Analyzed:

RES 487034-1  
R & R Environmental  
Tooole Broadway Project  
Tooole Broadway Project  
February 26, 2021  
EPA 600/R-93/116 - Short Report, Bulk  
Standard  
March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non- Asbestos Fibrous Components (%)	Non- Fibrous Components (%)
				Mineral	Visual Estimate (%)		
23	A	Off white fibrous woven material	10	Chrysotile	ND	95	5
	B	Silver paint	12	Chrysotile	7	0	93
	C	Black tar	15	Chrysotile	TR	0	100
	D	Black resinous tar	63	Chrysotile	10	0	90
24	A	Silver paint	15	Chrysotile	5	0	95
	B	Black tar	30	Chrysotile	TR	0	100
	C	Black resinous tar	55	Chrysotile	10	0	90
25	A	Silver paint	10	Chrysotile	5	0	95
	B	Black tar	30	Chrysotile	2	0	98
	C	Black resinous tar	60	Chrysotile	12	0	88
26	A	Silver paint	13	Chrysotile	8	0	92
	B	Black tar	35	Chrysotile	ND	0	100
	C	Black resinous tar	52	Chrysotile	10	0	90

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

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 487034-1

Client: R & R Environmental

Client Project Number / P.O.: Tooele Broadway Project

Client Project Description: Tooele Broadway Project

Date Samples Received: February 26, 2021

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

Turnaround: Standard

Date Samples Analyzed: March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Sub Part (%)	Asbestos Content		Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
				Mineral	Visual Estimate (%)		
27	A	Silver paint	10	Chrysotile	5	0	95
	B	Black tar	30	Chrysotile	TR	0	100
	C	Black resinous tar	60	Chrysotile	10	0	90
28	A	Tan adhesive	5		ND	0	100
	B	Tan wood	15		ND	95	5
	C	White/multi-colored fibrous resinous material	80		ND	35	65
29	A	Colorless adhesive	3		ND	0	100
	B	White/multi-colored fibrous resinous material	97		ND	35	65
	A	Tan adhesive	5		ND	0	100
30	B	White/multi-colored fibrous resinous material	95		ND	35	65
	A	Tan wood	100		ND	90	10
	A	Tan adhesive	7		ND	0	100
31	B	Tan wood	35		ND	90	10
	C	White/multi-colored fibrous resinous material	58		ND	35	65

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

RESERVOIRS ENVIRONMENTAL INC.

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 487034-1

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Client Project Number / P.O.: Tooele Broadway Project

Client Project Description: Tooele Broadway Project

Date Samples Received: February 26, 2021

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

Turnaround: Standard

Date Samples Analyzed: March 09, 2021

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

Client Sample Number	L A Y E R	Physical Description	Asbestos Content		Sub Part (%)	Asbestos Fibrous Components (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
			Mineral	Visual Estimate (%)				
33	A	A Brown fibrous woven material		ND	15	95		5
	B	Gray fibrous material	Chrysotile	75	85	3		22
34	A	Gray fibrous material	Chrysotile	75	100	5		20
35	A	Gray fibrous material	Chrysotile	75	100	5		20
36	A	Off white granular plaster		ND	100	7		93
37	A	White plaster		ND	30	0		100
	B	Off white granular plaster		ND	70	4		96
38	A	White plaster		ND	35	0		100
	B	Off white granular plaster		ND	65	4		96
39	A	White plaster		ND	30	0		100
	B	Off white granular plaster		ND	70	5		95
40	A	White plaster		ND	30	0		100
	B	Off white granular plaster		ND	70	5		95

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

Marian Banker

Analyst / Data QA



# Reservoirs Environmental, Inc.

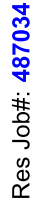
RES Job #: 487034

SUBMITTED BY		INVOICE TO		CONTACT INFORMATION		SERIES	
Company: <b>R &amp; R Environmental</b>		Company: <b>R &amp; R Environmental</b>		Contact: <b>Dave Roskelley</b>		<b>-1 PLM Standard</b>	
Address: <b>47 West 9000 South #2</b>		Address: <b>47 West 9000 South #2</b>		Phone: <b>(801) 541-1035</b>			
Sandy, UT 84070		Sandy, UT 84070		Fax:			
Project Number and/or P.O. #:		Tooele Broadway Project		Cell:			
Project Description/Location:		Tooele Broadway Project		Final Data Deliverable Email Address:			
				dave@rrenviro.com (+ 2 ADDNL. CONTACTS)			

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm & Sat. 8am - 5pm				REQUESTED ANALYSIS				VALID MATRIX CODES				LAB NOTES													
PLM / PCM / TEM	DTL	RUSH	PRIORITY	STANDARD	TEM - AHERA (+/- or Quantified), Microvac (+/- or Quantified), Wipe (+/- or Quantified), NIOSH 7402, Yamate Level II, ISO 10312, ISO 13794, Chatfield, Drinking Water, Waste Water, Bulk +/-, CARB Modified Ahera	PCM - 7400A, 7400B, OSHA	DUST - Total, Respirable	METALS - Analyte(s)	CHEMISTRY	ORGANICS - Methamphetamine, TSS	VIABLES - Campylobacter, Bacillus, Salmonella (Culturable or 1-2), Listeria, E. coli O157:H7, E. coli/Coliforms - Plated, S. aureus, Yeast & Mol, Aerobic Plate Count, Coliforms/E. coli - (State Water, Drinking Water, Non-Drinking Water, +/- Quantification), Lactic Acid, Viable Microbial Count (wo/ID or w/ID), Enterococcus (+/- or Quantification), Legionella (P, NP, C)	MEDICAL - Bioburden, LAL	MOLD - Spore Trap, Bulk Mold, Particulate Identification	Sample Volume (L) / Area	Length (or Aliquots) x Width (or Area per Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm	Laboratory Analysis Instructions					
1	01	2	02	3	03	4	04	5	05	6	06	7	07								8	08	9	09	10
Special Instructions:				PLM - PLM Short Report (EPA/600/R-93/116)																					
Client Sample ID Number				(Sample ID's must be unique)																					
1				01				X																	
2				02				X																	
3				03				X																	
4				04				X																	
5				05				X																	
6				06				X																	
7				07				X																	
8				08				X																	
9				09				X																	
10				10				X																	
11				11				X																	
12				12				X																	
13				13				X																	

REI will analyze incoming samples based on 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.

Relinquished By:		Dave Roskelley	Date/Time: 02/24/2021 16:23:04	Sample Condition: <b>Acceptable</b>
Received By:		Brett Colbert	Date/Time: 02/26/2021 12:22:18	Carrier: <b>Fed-Ex</b>



(303) 964-1986  
(866) RESI-ENV

5801 Logan St, Suite 100, Denver, CO 80216  
Page 2 of 2

[illegible]

## **CONCLUSIONS AND RECOMMENDATIONS**



## **CONCLUSIONS AND RECOMMENDATIONS**

The Asbestos Survey conducted at the Former Broadway Hotel found asbestos-containing materials (ACM) within the areas surveyed. Refer to the Executive Summary for additional information and recommendations.

## **SIGNATURES & CERTIFICATIONS**

**AN ASBESTOS SURVEY AND ASSESSMENT  
FOR THE  
BROADWAY HERITAGE VILLAGE  
(FORMER BROADWAY HOTEL)  
140 NORTH BROADWAY  
TOOELE, UTAH 84074**

During the month of February 2021, R&R Environmental, Inc., (R&R) of Sandy, Utah, conducted a asbestos survey and assessment of the Former Broadway Hotel, Tooele, Utah. Bulk samples of suspect asbestos-containing materials (ACM) were collected and analyzed.

The following accredited and certified inspectors performed the inspection, collected the samples and made assessment:

This report was reviewed by:



---

David C. Roskelley, MSPH, CIH, CSP  
State of Utah, Division of Air Quality Inspector  
Certification Number: ASB-1370 (ASBC-237)  
AHERA Inspector #5 PSI 65451 I  
Certified Safety Professional #15774  
Certified Industrial Hygienist #8529

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February 16, 2021



State of Utah

GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

Department of  
Environmental Quality

Alan Matheson  
*Executive Director*

DIVISION OF AIR QUALITY  
Bryce C. Bird  
*Director*

Utah Department of Environmental Quality  
Division of Air Quality

The Utah Division of Air Quality certifies that:

**R & R Environmental, Inc.**

is hereby certified as an asbestos company in  
accordance with the provisions of Utah Administrative  
Code R307-801

Certification number: ASBC-237

Expiration date: 12/31/23 *Bryce C. Bird*

Director, Utah Division of Air Quality

September 26, 2018

DAQA-003-18

David Roskelley  
R&R Environmental, Inc.  
47 West 9000 South, #2  
Sandy, UT 84070

Dear Mr. Roskelley:

Re: Utah Asbestos Company Certification Card

The Utah Division of Air Quality (DAQ) has received your Certification Application for Asbestos Company and we are pleased to inform you that your application has been approved. Your new Asbestos company certification card is enclosed with this letter and this card is the sole method of Asbestos company certification documentation that you will receive from the DAQ. Please check the information on your asbestos company certification card carefully and please confirm that the company name and certification expiration date are correct.

Please be aware that your company is certified to perform asbestos projects in accordance with applicable state and federal rules and the use of Utah certified individuals is mandatory. Also, your certification may be revoked or suspended if the Utah certified individual or company are found to be in violation of the asbestos certification and work practices standards found in Utah Administrative Code R307-801 or the National Emission Standard for Asbestos found in Title 40 Code of Federal Regulations Part 61 Subpart M.

Please contact Tamie Call at (801) 536-4007 or at [twcall@utah.gov](mailto:twcall@utah.gov) if you have any questions about this letter or the enclosed asbestos company certification card.

Sincerely,

Robert W. Ford, Manager  
Air Toxics, Lead-Based Paint, and Asbestos Section

RWF:TC:lr



State of Utah

GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

Department of  
Environmental Quality

L. Scott Baird  
Executive Director

DIVISION OF AIR QUALITY  
Bryce C. Bird  
Director

Utah Asbestos Certification



David C. Roskelley  
ASB-1370

Inspector (Exp. 08/26/2021)

Management Planner (Exp. 08/26/2021)

Supervisor (Exp. 04/30/2021)

Project Designer (Exp. 07/15/2021)

  
Director, Utah Division of Air Quality

September 8, 2020

DAQA-001-20

David Roskelley  
R&R Environmental, Inc.  
47 West 9000 South, #2  
Sandy, UT 84070

Dear Mr. Roskelley:

Re: Utah Asbestos Program Individual Certification Card

The Utah Division of Air Quality (DAQ) has reviewed your Utah Asbestos Program Certification Application for Individuals and we are pleased to inform you that your application has been approved. Your new asbestos program individual certification card is enclosed with this letter and this card is the sole method of individual certification documentation that you will receive from the DAQ.

Please check the information on your asbestos program certification card carefully. Please confirm that the photograph, name, and certification discipline(s) are correct. Also, please remember to keep your current asbestos program certification card with you at all times when you are performing regulated asbestos work activities.

Please contact Tamie Call at (801) 536-4007 or at [twcall@utah.gov](mailto:twcall@utah.gov) if you have any questions regarding this letter or the enclosed asbestos program certification card.

Sincerely,



Leonard Wright, Manager  
Air Toxics, Lead-Based Paint, and Asbestos Section

LW:TC:lr





State of Utah

GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

Department of  
Environmental Quality

Alan Matheson  
Executive Director

DIVISION OF AIR QUALITY  
Bryce C. Bird  
Director

Utah Department of Environmental Quality  
Division of Air Quality

The Utah Division of Air Quality certifies that:

**R & R Environmental, Inc.**

is hereby certified as **Lead-Based Paint** firm in  
accordance with the provisions of Utah Administrative  
Code R307-841 and R307-842.

Certification number: **PBF-0059**

Expiration date: **05/31/22** *Bryce C. Bird*  
Director, Utah Division of Air Quality

DAQA-004-16

November 9, 2016

David C. Roskelley  
R&R Environmental, Inc.  
47 West 9000 South #2  
Sandy, UT 84070

Dear Mr. Roskelley:

Re: Utah Lead-Based Paint Firm Certification Card

The Utah Division of Air Quality (DAQ) has received your Lead-Based Paint (LBP) Certification Application for Firms and we are pleased to inform you that your application has been approved. Your new LBP firm certification card is enclosed with this letter and this card is the sole method of LBP firm certification documentation that you will receive from the DAQ. Please check the information on your LBP firm certification card carefully and please confirm that the LBP firm name and certification expiration date are correct.

Please be aware that your LBP firm is certified to perform regulated LBP projects in accordance with applicable state administrative rules and federal regulations and the use of Utah certified individuals is mandatory. Also, your LBP firm certification may be revoked or suspended if the Utah certified individual or LBP firm are found to be in violation of the LBP certification and work practice standards found in Utah Administrative Code R307-841 and R307-842 or the federal LBP regulations found in Title 40 Code of Federal Regulations Part 745.

If you have any questions regarding this letter or the enclosed LBP firm certification card, please contact Lisa Haroutunian at (801) 536-4007 or at [lhharoutunian@utah.gov](mailto:lhharoutunian@utah.gov).

Sincerely,

Robert W. Ford, Manager  
Air Toxics, Lead-Based Paint, and Asbestos Section

RWF:LH:lr *RLW*



State of Utah

GARY R. HERBERT  
Governor

SPENCER J. COX  
Lieutenant Governor

Department of  
Environmental Quality

Alan Matheson  
Executive Director

DIVISION OF AIR QUALITY  
Bryce C. Bird  
Director

Utah Lead-Based Paint Certification



David C. Roskelley  
PB-1041

Inspector (Exp. 02/13/2022)

Risk Assessor (Exp. 02/14/2022)

  
Director, Utah Division of Air Quality

March 13, 2019

DAQA-002-19

David Roskelley  
R&R Environmental, Inc.  
47 West 9000 South, #2  
Sandy, UT 84070

  
Dear Mr. Roskelley:

Re: Utah Lead-Based Paint Program Individual Certification Card

The Utah Division of Air Quality (DAQ) has reviewed your Utah Lead-Based Paint (LBP) Program Certification Application for Individuals and we are pleased to inform you that your application has been approved. Your new LBP program individual certification card is enclosed with this letter and this card is the sole method of individual certification documentation that you will receive from the DAQ.


Please check the information on your LBP program certification card carefully. Please confirm that the photograph, name, and certification discipline(s) are correct. Also, please remember to keep your current LBP program certification card with you at all times when you are performing regulated LBP work activities.

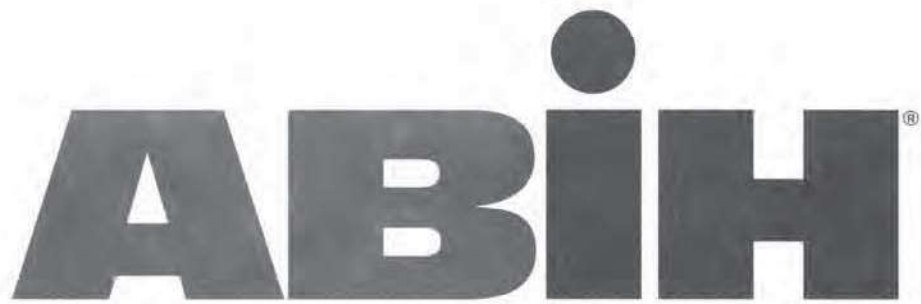
Please contact Tamie Call at (801) 536-4007 or at [twcall@utah.gov](mailto:twcall@utah.gov) if you have any questions regarding this letter or the enclosed LBP program certification card.

Sincerely,



Robert W. Ford, Manager  
Air Toxics, Lead-Based Paint, and Asbestos Section

RWF:TC:lrLT 



**american board of industrial hygiene®**

organized to improve the practice of industrial hygiene  
proclaims that

*David C. Roskelley*

having met all requirements of  
education, experience and examination, and  
ongoing maintenance,  
is hereby certified in the

**COMPREHENSIVE PRACTICE  
of  
INDUSTRIAL HYGIENE**

and has the right to use the designations

**CERTIFIED INDUSTRIAL HYGIENIST**

**CIH**

Certificate Number	8529 CP
Awarded:	July 3, 2003
Expiration Date:	December 1, 2023



*Jeffrey M. Miller*  
Chair, ABIH

*John P. Miller*  
Chief Executive Officer, ABIH

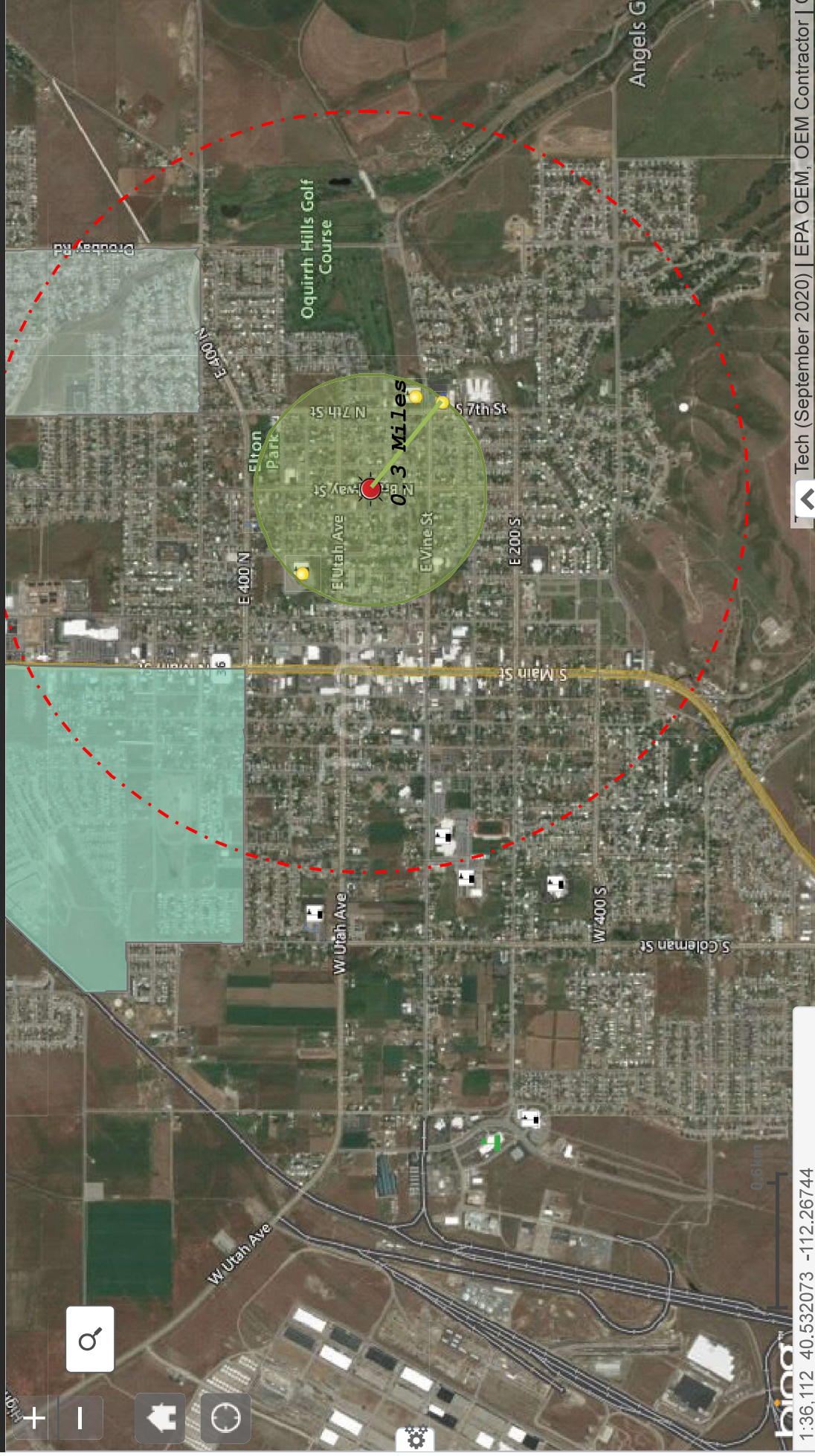


## Attachment 2 Site Map



# EPA Region 8

TERA Viewer



## Legend:

- Hotel Location - Red Dot
- Schools or education centers - Yellow Dots
- Population - Red Outline
- Potential EJ Areas (State 80 Percentile) - Light Teal Poly
- Potential EJ Areas (Regional 80 Percentile) - Dark Teal Poly

## Receptors & Notes:

Three primary schools within a 0.3 mile radius, some are closer.  
Population within the given radius (1.3 miles) is 4,400 people.

Field observations by the OSC show heavy foot traffic, vehicle traffic, mix density housing, and evidence of scavenging and trespassing.

Created: 01/28/2022

Location: Toole, UT, Broadway Hotel

### Attachment 3 Site Photos

# Broadway Hotel

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## Photo Category: Admin Record

---

Description: Debris pile of the former Broadway Hotel. Temporary fencing has been placed to deter trespassing but has been inadequate. Debris and friable asbestos containing materials are open to the air and environment. Facing east to showcase extent of debris pile.

Category: Admin Record      Latitude: 40.5330641534572

Date Taken: 2/7/2022      Longitude: -112.28823258536

Tags:



Description: Debris pile of the former Broadway Hotel. Temporary fencing has been placed to deter trespassing but has been inadequate. Debris and friable asbestos containing materials are open to the air and environment. Facing northwest to showcase extent of debris pile.

Category: Admin Record      Latitude: 40.5330322715873

Date Taken: 2/7/2022      Longitude: -112.288254042584

Tags:



Description: Debris pile of the former Broadway Hotel. Temporary fencing has been placed to deter trespassing but has been inadequate. Debris and friable asbestos containing materials are open to the air and environment. Facing north to showcase extent of debris pile and proximity to public walkways.

Category: Admin Record      Latitude: 40.533048580645

Date Taken: 2/7/2022      Longitude: -112.288254042584

Tags:





## Broadway Hotel

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### Photo Category: Admin Record

---

Description: Debris pile of the former Broadway Hotel. Temporary fencing has been placed to deter trespassing but has been inadequate. Debris and friable asbestos containing materials are open to the air and environment. Facing west to showcase extent of debris pile.

Category: Admin Record      Latitude: 40.5330893532721

Date Taken: 2/7/2022      Longitude: -112.28823258536

Tags:



Description: Debris pile of the former Broadway Hotel. Temporary fencing has been placed to deter trespassing but has been inadequate. Debris and friable asbestos containing materials are open to the air and environment. Facing south to showcase extent of debris pile.

Category: Admin Record      Latitude: 40.5330410300913

Date Taken: 2/7/2022      Longitude: -112.288254042584

Tags:

