



August 14, 2024

Eric Curry  
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NWCC Project No: 24-13420

Subject: Inspection for Asbestos Containing  
Building Materials, 61 West Acres  
Avenue, Steamboat Springs,  
Colorado

Dear Mr. Curry:

NWCC, Inc. (NWCC) is pleased to present results of an inspection for asbestos containing building materials (ACBMs) conducted on August 7, 2024 at the approximate 1,775 square foot (ft<sup>3</sup>) mobile home located at 61 West Acres Drive, Steamboat Springs, Colorado. On June 17, 2024, a plane crashed into the West Acres Mobile Home Park, resulting in the collapse and partial incineration of the mobile home and outbuilding. Eric Curry, a contractor, requested the asbestos inspection for building demolition purposes. NWCC conducted the inspection under contract with the R.A.I., Inc.

NWCC conducted a site visit on July 23, 2024. Based upon observations, the building materials were burned or charred. The southern portion of the structure still stood and the northern portion had completely collapsed. Dry wall, sheet vinyl, tar roofing, surfacing material, and window caulking was observed among the rubble during this site visit.

Colorado Department of Public Health and Environment (CDPHE), Air Pollution Control Division (APCD) required a soil sampling plan (SSP) because of potential asbestos contamination from fire debris (ash). NWCC prepared and submitted the SSP to APCD and was approved on August 1, 2024. A subsequent meeting at the subject property between NWCC and APCD occurred on August 7, 2024. The meeting resulted in an alteration to the Scope of Work (SOW). It was agreed that safely accessible and identifiable building materials would be sampled and a reasonable attempt to calculate square footages would be conducted.

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

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NWCC collected bulk samples that were deemed safely accessible on August 7, 2024. An inspection for ACBMs is required prior to renovation or demolition of commercial properties that may disturb materials identified as “suspect ACBMs” encompassing a greater than 160 square foot (ft<sup>2</sup>) area, in accordance with Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Commission (AQCC) Regulation No. 8, Part B (Part B).

The inspection was conducted to help determine the presence and condition of suspect ACBMs. Inspection activities included a visual assessment of suspect ACBMs, collection of bulk samples, laboratory testing, and report preparation. The asbestos inspection was performed in accordance with Part B using the industry standard level of care typical for the type of building and use. A discussion of inspection, sampling, and test results is provided in the following three sections and attachments.

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

## 1.0 Asbestos Inspection

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

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

- *Tan, Surfacing Material:* Seven samples (*SM1 through SM7*) were collected from approximately 2,848 ft<sup>2</sup> of assumed walls and ceilings in the remaining rubble. The collected samples were classified as friable surfacing material observed in significantly damaged condition.
- *Drywall:* Two samples (*DRY1 and DRY2*) and Associated Components (e.g., tape and joint compound) were collected from approximately 3,016 ft<sup>2</sup> of assumed walls and ceilings in the remaining rubble. The collected samples were classified as friable miscellaneous material observed in significantly damaged condition.

- **Black, Caulk:** Two samples (*WCLK1 and WCLK2*) were collected from approximately 10 linear feet of window trim from the second window from the southwest corner. The collected samples were classified as nonfriable miscellaneous material observed in damaged condition. The quantity of this material is estimated at less than 1-gallon.
- **Tan, Sheet Vinyl:** Two samples (*ASV1 and ASV2*) were collected from approximately 377 ft<sup>2</sup> of flooring, underlying carpet in the south portion of the structure as well as dispersed throughout the rubble. The collected samples were classified as nonfriable miscellaneous material observed in significantly damaged condition.
- **Tan, Sheet Vinyl:** Two samples (*BSV1 and BSV2*) were collected from approximately 33 ft<sup>2</sup> of flooring in the northeastern portion of the rubble. The collected samples were classified as nonfriable miscellaneous material observed in significantly damaged condition. In accordance with Reg. 8 Section IV.F.2.d. this material was classified as damaged or significantly damaged friable miscellaneous ACM.
- **Black, Tar Roofing Underlayment:** Two samples (*RTAR1 and RTAR2*) were collected from approximately 1,048 ft<sup>2</sup> of roofing underlayment on the southwest portion of the structure. The collected samples were classified as nonfriable miscellaneous material observed in significantly damaged condition. In accordance with Reg. 8 Section IV.F.2. d. this material was classified as damaged or significantly damaged friable miscellaneous ACM.

A total of 17 samples were collected for asbestos testing. Seven samples were classified as surfacing material, and 10 classified as miscellaneous materials. None of the samples were classified as thermal system insulation. Suspect materials were observed in damaged and significantly damaged condition as defined in Part B.

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

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

## **2.0 Findings and Recommendations**

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

### Tan Sheet Vinyl

- Chrysotile asbestos reported at 25% in the brown sheet vinyl with gray fibrous backing with yellow mastic (Samples BSV1 and BSV2) components of the tan sheet vinyl collected from the northeast portion of the rubble. All homogeneous sheet vinyl is considered ACBM.

### Black Tar Roofing

- Chrysotile asbestos reported at 3% in the black fibrous resinous tar with white paint (Samples RTAR1 and RTAR2) component of the tar roofing collected from roofing underlayment on the southwest portion of the structure. All tar roofing in this homogenous area is considered ACBM.

Thirty-three square feet of the tan, sheet vinyl was observed at the site during sampling, which is below the 160 ft<sup>2</sup> regulation trigger levels for demolition. Though the observed square footage of the sheet vinyl is below the trigger level, it is probable that additional sheet vinyl is buried within the rubble.

The black, tar roofing covers the entirety of the 1,048 ft<sup>2</sup> footprint of the structure, which is above the regulatory trigger level. Due to the plane crash and resulting fire the tar roofing is most likely dispersed throughout the rubble and indistinguishable from other building materials.

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

## **3.0 Limitations**

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

There is no guarantee that suspect materials are not hidden or buried within the facilities. The act of determining the presence or absence of asbestos fibers in a particular homogeneous area should not be interpreted as a guarantee that asbestos does or does not exist, rather it is an opinion based upon extrapolation and interpretation of limited test results to materials exhibiting similar physical appearances, locales, and histories. There

are no guarantees regarding the reliability and accuracy of the information provided except precisely where each material sample was collected. No other warranty, expressed or implied, is given based upon the content of this report.

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

Sincerely,

**NWCC, Inc.**

COLORADO ASBESTOS CONSULTING FIRM

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Attachments