

FILED

07 AUG -8 PM 3:35

REGIONAL HEARING CLERK  
EPA REGION VI



Benton County School of the Arts (Docket # TSCA 06-2006-6078)  
2005 S. 12<sup>th</sup> Street  
Rogers, Arkansas 72758  
August 3, 2007

Lorena S. Vaughn, Regional Hearing Clerk  
Environmental Protection Agency  
1445 Ross Avenue  
Dallas, Texas 75202

Ms Vaughn:

I am writing in response to the complaint letter dated March 28, 2007 and the order to file answer dated July 9, 2007. The following will outline the events that have occurred following the notification that the school was out of compliance.

- 1) The original inspection of the facility was conducted by Haz-Mert to determine the status of the building. Documentation has been provided that outlines that initial inspection and the results. However, no evidence was found that indicated that a management plan was developed. I met with officials from Haz-Mert in February of 2007 and discussed the issue. They were able to document the original inspection and findings, but could not produce a management plan as required.
- 2) Haz-Mert performed an additional inspection in early March of 2007 and provided some additional suggestions on dealing with the remaining asbestos material in the building. The remaining material is found in the adhesive that was used to attach floor tiles. It was recommended that the remaining tile and adhesive be removed.
- 3) I contacted Environmental Enterprise Group in Fayetteville, Arkansas, at the request of officials with Haz-Mert to see about scheduling the material removal. That removal was accomplished in July 2007.
- 4) Following this removal, the building should be asbestos free and we will have documentation to verify that status.

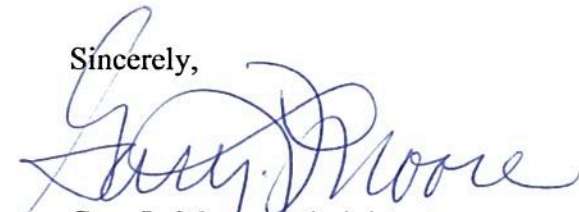
- 5) The regional educational cooperative, Northwest Arkansas Educational Service Cooperative, of which BCSA is a member, has a certified inspector on staff. We will have a management plan developed and our co-op specialist will provide the inspections as required and provide the documentation to verify compliance on an annual basis.
- 6) These steps should allow us to meet the requirements outlined in 40 CFR sections 763.93 (a)(3), 763.93 (i), 763.93 (e)(4), 763.94 (d), 763.94 (c), 763.93 (g)(4), and 763.84 (c).

The school does not deny any of the allegations contained in the complaint. The school does not wish to request a hearing on the matter. Our goal has been to remove the remaining material and develop a management plan with the assistance of our consultant from Environmental Enterprise Group, Inc. This information has been reported to Elvia Evering, our contact person within the department.

Thus far our efforts have been to rectify the situation with regard to the lack of a management plan and the abatement of any additional asbestos containing material within the elementary wing of our facility. As you will be able to see from the enclosed information, the abatement process has been completed.

Additional information will be available as the plans are further developed. If you need additional information or if this submission is not acceptable please contact me and I will provide whatever is necessary to comply with the EPA requirements. Our goal is to provide a safe environment for our students and staff and we will take whatever steps are necessary to accomplish it. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads "Gary L. Moore". The signature is written in a cursive style with a large initial "G".

Gary L. Moore, Administrator  
Benton County School of the Arts





**ENVIRONMENTAL ENTERPRISE GROUP, INC.**

A 3W Company

*Environmental Consulting and Laboratory Services*

**INDUSTRIAL HYGIENE  
AIR MONITORING REPORT**

*for*

**Asbestos Removal Project  
Benton County School of the Arts  
2005 South 12<sup>th</sup> Street  
Rogers, Arkansas 72758**

**Project # 07-0111-061**

220 North Knoxville, Suite 200  
Russellville, Arkansas 72801  
(479) 968-6767 • Fax (479) 968-1956

2209 Main Drive  
Fayetteville, Arkansas 72704  
(479) 444-6214 • Fax (479) 444-0437  
[www.3wco.com](http://www.3wco.com)

**(800) 530-7968**

***Prepared for:***

Mr. Gary Moore  
Benton Co. School of the Arts  
2005 South 12<sup>th</sup> Street  
Rogers, Arkansas 72758

***July 18, 2007***

***Committed To Understanding, Servicing, and Satisfying Our Clients***



# TABLE OF CONTENTS

---

|     |   |   |
|-----|---|---|
| 1.0 | SUMMARY OF WORK .....                                   | 1 |
| 2.0 | QUALIFICATION STATEMENT/ LABORATORY QUALIFICATIONS..... | 2 |
| 2.1 | QUALIFICATION STATEMENT .....                           | 2 |
| 2.2 | LABORATORY QUALIFICATIONS.....                          | 3 |
| 3.0 | METHODOLOGIES .....                                     | 4 |
| 3.1 | PHASE CONTRAST MICROSCOPY (PCM) .....                   | 4 |
| 3.2 | AIR SAMPLING BEFORE ABATEMENT BEGINS .....              | 4 |
| 3.3 | PERSONAL SAMPLING .....                                 | 4 |
| 3.4 | AREA AIR SAMPLING INSIDE THE WORK AREA.....             | 4 |
| 3.5 | AREA AIR SAMPLING OF ADJACENT AREAS.....                | 5 |
| 3.6 | AREA AIR SAMPLING OUTSIDE THE WORK AREA.....            | 5 |
| 3.7 | AIR SAMPLING AFTER FINAL CLEANUP OF WORK AREA .....     | 5 |
| 3.8 | SUMMARY OF COMPLETION OF RESPONSE ACTIONS.....          | 6 |

## APPENDICES

*Daily Project Management and Air Sampling Reports*

*Field Air Sampling and TEM Analysis Reports*

*Abatement Project Visual Inspection and Clearance Sampling Report*

*Clearance of Project*

*Accreditations*

**Contractor:** Gerken Environmental  
Springfield, Missouri

## 1.0 SUMMARY OF WORK

ENVIRONMENTAL ENTERPRISE GROUP, INC. (EEG) was retained by Mr. Gary Moore of Benton County School of the Arts to perform Project Management and Industrial Hygiene Air Monitoring Services on the asbestos removal project at Benton County School of the Arts located in Rogers, Arkansas. Mr. Kendall Shelby performed Project Management and Air Monitoring services on July 9, 2007. Mr. Shelby has successfully completed the National Institute for Occupational Safety and Health (NIOSH) 582 Equivalency Course for Fiber Counting and Analysis, the Asbestos Abatement Supervisor Training Course, and the Principles of Asbestos Air Monitoring Course. Mr. Shelby is also certified by the Arkansas Department of Environmental Quality (ADEQ) in the disciplines of Project Designer, Air Monitor and Inspector, Certification No. 011484.

The scope of work for this project involved the removal of asbestos-containing floor tile and mastic located at Benton County School of the Arts in Rogers, Arkansas.

On July 9, 2007, Mr. Shelby arrived at the project site and met with Mr. Armando Garcia of Gerken Environmental. Mr. Shelby performed the visual inspection of the affected area at the completion of the abatement activity. Air clearance samples were collected by Mr. Shelby from 4:12 p.m. to 7:12 p.m. on July 9, 2007.

Air clearance samples were analyzed by Mr. James Blankenship utilizing Transmission Electron Microscopy (TEM) at Steve Moody Micro Services in Farmers Branch, Texas. The results of the final clearance samples were below the clearance criterion of 70 structures per square millimeter ( $<70 \text{ s/mm}^2$ ). Results were reported to Mr. Armando Garcia of Gerken Environmental at the completion of the project.

This report cannot be copied without the written permission of EEG Inc., Gerken Environmental, and Mr. Gary Moore.

This report prepared by:



Bob E. Smith  
Senior Project Manager

07/18/07

Date

## 2.0 QUALIFICATION STATEMENT/ LABORATORY QUALIFICATIONS

### 2.1 Qualification Statement

Environmental Enterprise Group (EEG), Inc. is an environmental consulting and analytical services firm specializing in hazardous materials assessment. EEG's staff has provided consulting services for federal, state and local governments, environmental agencies, commercial, industrial and manufacturing facilities, lending institutions, hospitals, schools and real estate investment firms.

The staff of EEG is dedicated to the fulfillment of all commitments to the client and the completion of tasks in a timely, accurate and cost-effective manner. This dedication has produced a solid client base that can attest to the quality of our services.

The staff of EEG has performed Hazard Assessment Surveys on more than 20 million square feet of building space and over 1,000 Environmental Site Assessments for a wide range of clients throughout the country. Our unique combination of professional disciplines allows us to provide a comprehensive, interdisciplinary approach to environmental and industrial hygiene inspections. Our staff has more than twenty years of environmental experience ranging from field inspection to laboratory analysis.

EEG's scope of services has grown as the environmental consulting needs of our clients have increased. The company was founded in 1988 as an industrial hygiene and asbestos consulting and analytical firm. With the solid financial backing of our parent corporation, EWI Constructors, Inc., founded in 1956, EEG has been able to acquire the staff and analytical equipment necessary to provide comprehensive environmental services to our clients.

With accreditation and quality control as a fundamental guideline, EEG has been given federal and state approval to analyze and/or supervise projects dealing with various environmental hazards including airborne and bulk asbestos.

The entire staff believes that all of our clients should clearly understand the meaning and impact of our findings as it relates to the property in question. Our environmental reports provide firm conclusions and realistic recommendations, taking into consideration relevant and applicable local, state and federal requirements. The foundation of all work performed by the staff of EEG is the dedication to the fulfillment of all client commitments and the completion of tasks in a timely, accurate and effective manner.



## 2.2 Laboratory Qualifications

EEG's laboratory is fully accredited for Bulk Asbestos Analysis for Polarized Light Microscopy (PLM) under the National Institute of Standards and Technology (NIST) – NVLAP and for Phase Contrast Microscopy (PCM) Air Analysis under the American Industrial Hygiene Association (AIHA) as an Industrial Hygiene Laboratory.

EEG's laboratory quality assurance and quality control (QA/QC) program is based on procedures recommended by the American Industrial Hygiene Association (AIHA), the NIOSH and the U.S. Environmental Protection Agency (U.S. EPA).

TEM asbestos fiber analysis is conducted according to NVLAP Test Method/Asbestos Hazard Emergency Response ACT (AHERA) Mandatory Method (40 Code of Federal Regulations (CFR) Chapter I (1-1-87 edition), Part 763, Subpart E, Appendix A) or the current U.S. EPA method to determine completion of response actions for analyzing asbestos air samples by TEM.

PCM airborne asbestos sample analysis is conducted according to NIOSH Method 7400. EEG's laboratory is also a successful participant in the NIOSH/AIHA PAT Program.

PLM bulk asbestos sample analysis is conducted according to NVLAP Test Method (40 CFR Chapter I (1-1-87 edition), Part 763, Subpart F, Appendix A, pages 293-299), or the current U.S. EPA method for the analysis of asbestos in building material by PLM.

### 3.0 METHODOLOGIES

#### 3.1 Phase Contrast Microscopy (PCM)

Air samples are analyzed by Phase Contrast Microscopy (PCM) using the NIOSH Method 7400. PCM is a technique using a light microscope equipped to provide enhanced contrast between the fibers collected and the background filter material. Samples for analysis by PCM are collected on a 25-mm, mixed cellulose ester (MCE) filter with a 0.45 to 1.2 micrometer pore size. Filters are then prepared by an acetone vapor that renders the filter material optically transparent. The filter is then examined under a positive phase contrast microscope at a magnification of approximately 400x. Fibers are sized and counted using a calibrated reticle fitted into the microscope eyepiece.

PCM is the analytical method specified in the OSHA Asbestos Standards 29 CFR 1910.1001 and 29 CFR 1926.1101.

#### 3.2 Air Sampling Before Abatement Begins

Prevalent level samples are typically collected throughout the building as well as in the areas where abatement will take place. One sample is collected for every 50,000 cubic feet of building space (minimum of 3 samples). At least one sample may be collected from outside the building.

#### 3.3 Personal Sampling

Personal sampling is conducted during a renovation or abatement project to determine employees' exposure (outside the respirator) to airborne fibers. Monitoring during an abatement project is required by the OSHA Asbestos Standards (29 CFR 1910.1001 and 1926.1101). Personal sampling can be used to select proper respiratory protection for an employee if conditions warrant something other than Type C respirators. Data from personal monitoring can be used as an indication of effective removal or control techniques that result in the lowest employee exposure.

Personal samples are collected at a flow rate of 0.5-2.5 liters per minute (Lpm). Samples for asbestos exposure are collected to determine the 8-hour, time-weighted average concentration.

Over an eight-hour period, filters may have to be changed several times to prevent overloading. Each filter concentration can be calculated by using the following equation to obtain a time-weighted average concentration for the total sampling period:

$$\frac{C_1T_1 + C_2T_2 + C_3T_3\dots}{T_1 + T_2 + T_3\dots} = \text{Time-Weighted Average,}$$

where C is the fiber concentration expressed as fibers per cubic centimeter (f/cc) and T is the duration of sample in minutes.

#### 3.4 Area Air Sampling Inside the Work Area

In addition to personal samples, area air samples may be collected from inside the work area daily to determine the concentrations of airborne asbestos fibers. Two to three samples are usually adequate to index the airborne fiber concentrations inside the work area.



### 3.5 Area Air Sampling of Adjacent Areas

During an abatement project, samples may be collected from adjacent locations outside the work area but inside the building, to determine how well asbestos fibers are being contained in the worksite. Potential leakage points where sampling is conducted include the clean side of the containment barriers separating the work area from occupied parts of the building and inside the clean room of the decontamination unit.

If the abatement project is being conducted in a multistory building, area air samples are collected from floors above and below the abatement activity.

### 3.6 Area Air Sampling Outside the Work Area

Area air samples are placed in locations outside the work area during the abatement project to detect leakage of fibers from the worksite. Typically, pumps are placed at the entrance of the decontamination unit, at doors or windows near the exhaust of the negative air filtration units and at the waste load out area.

### 3.7 Air Sampling After Final Cleanup of Work Area

Area air sampling is conducted upon conclusion of an asbestos abatement project to estimate the airborne concentration of residual fibers. The area must pass a thorough visual inspection for remaining material before final clearance sampling is initiated.

A visual inspection is typically conducted in two phases. First, an inspector determines the completeness of removal. If any asbestos-containing material is clinging to the substrate, then the removal is not complete and the inspection does not continue. Once the removal is determined to be complete, all plastic coverings are removed except those essential to the integrity of the containment. The work area is then inspected for cleanliness. If any dust or debris is found, the area is re-cleaned before air sampling begins. The visual inspection process is subjective, or based on the inspector's professional judgment. EEG, Inc. is not liable for areas or concerns not within the Scope of Work.

Final clearance air samples are typically collected using high-volume pumps to draw at least 1,200 liters of air for PCM and 1,500 to 1,800 liters for TEM, which is within the sampling volume range recommended by AHERA. The number of samples collected depends on the size of the removal area and the sampling and analytical procedures being followed. Samples are collected using aggressive techniques. Aggressive air sampling involves physically or mechanically agitating the air in the work area during the sampling process. Typically, a 1-horsepower leaf blower is used on all surfaces in the work area to dislodge any residual fibers. The purpose of final clearance air sampling using aggressive techniques is to produce a "worst case" scenario. If the work area passes the final clearance levels in this "worst case" environment, then the likelihood of airborne asbestos fiber levels ever rising above the clearance level is remote.

Clearance samples are typically analyzed by PCM or TEM; however, TEM is the analytical method recognized as having the best resolution and positive fiber identification capabilities.

### 3.8 Summary of Completion of Response Actions

#### PCM

- ◆ Collect and analyze a minimum of five (5) inside samples. On non-AHERA projects in areas less than 300 square feet a minimum of three (3) inside samples. Analyze using the NIOSH 7400 Method.
- ◆ Analyze two (2) field blanks (or 10% of the total samples, whichever is greater)
- ◆ Analytical results must show that the concentration of fibers for each of the five (5) samples is less than .01 f/cc.

#### TEM

- ◆ Collect at least 13 samples
- ◆ Analyze five (5) inside samples
- ◆ If greater than or equal to 1,199 liters of air sampled (for 25-mm cassettes) or 2,799 liters of air (for 37-mm cassettes), area passes if arithmetic mean less than or equal to 70 structures per square millimeter of filter area ( $70 \text{ s/mm}^2$ )
- ◆ If less than 1,199 liters (2,799), or if greater than  $70 \text{ s/mm}^2$ , analyze three (3) blanks
- ◆ If arithmetic mean of blanks is greater than  $70 \text{ s/mm}^2$ , terminate analysis, identify source of contamination, and collect new samples
- ◆ If arithmetic mean of blanks is less than  $70 \text{ s/mm}^2$ , analyze outside samples and compare with Z-test
- ◆ If Z-test results are less than or equal to 1.65, response action is complete
- ◆ If Z-test results are greater than 1.65, re-clean and re-sample

#### Air Sampling

- ◆ Calibrate pumps before and after each use
- ◆ Pump flow rate of 1-10 liters per minute (Lpm) for 25-mm cassettes is typically used
- ◆ Maintain log of all pertinent sampling data
- ◆ Isolate pump vibration from filter cassette
- ◆ Orient cassette  $45^\circ$  downward from horizontal
- ◆ For area samples typically collect 600-1,200 liters of air
- ◆ For personal samples typically collect 480 liters of air
- ◆ For clearance samples typically collect 1,200 liters of air for PCM
- ◆ For clearance samples typically collect 1,500 to 1,800 liters of air for TEM

*Air monitoring cassettes will be retained by EEG, Inc. for a period of thirty (30) days. The cassettes may be returned to the client upon receipt of written request.*



---

**Daily Project Management  
& Air Sampling Reports**

---



Environmental  
Enterprise Group, Inc.

# Project Management Daily Report

07-0111-061

CLIENT Benton County School of the Arts  
PROPERTY Benton County School of the Arts

AIR MONITOR Kendall Shelby  
DATE 7-9-07

Project Location Benton Co. School of the Arts Asbestos-Containing Material(s) ft & mastic  
Undergoing Abatement

EEG Representative Kendall Shelby Hours Worked 9:20 ~~am~~ pm TO 8:00 am ~~pm~~

Contractor Gerken Environmental Superintendent Armando Garcia

Number of Abatement Personnel 3 Hours Worked 9:00 ~~am~~ pm TO 4:30 am ~~pm~~

Type of Work in Progress  Pre-Clean  Prep  Gross Removal  Gross Clean  Glovebag  Other \_\_\_\_\_

Number of PCM Work Area Samples Taken 4 Analyzed 4

Number of PCM Personal Samples Taken 2 Analyzed 2

Number of (PCM, TEM) Clearance Samples Taken 13 Analyzed 5

Number of Field Blank Samples Analyzed 2 QA/QC 1

Respirator Type in Use  Half-Face  Full-Face  PAPR  Type \_\_\_\_\_ Brand North

Protective Clothing Procedures Tyvek suit

Asbestos Wetting Procedures Aerated water

Use of Warning Signs and Labels Entrances

Loads of Debris to Landfill Prairie view Landfill per NOI

Status of Decon  Towels  Privacy  Shower Drainage  Filtration Unit  Hot Water  Soap  Other \_\_\_\_\_

Status of Poly Barriers Good

Status of Compressed Air Supply N/A

Cleanliness of Objects Removed from Work Area Good

Status of Neg Air Equipment and Manometer Readings Good

General Notes EEG arrives on-site at the Benton Co. School of the Arts. Gerken also on-site mobilizing equipment and will begin prepping the hallway to remove approx 900 ft<sup>2</sup> of floor tile & mastic. 11:00 Gerken complete prep and will leave site for lunch. 12:00 Gerken & EEG back on-site and will begin removal with spud bars. EEG will begin 2 inside area samples and 2 outside area samples. 1:00 Gerken will begin mastic removal utilizing brooms, rags and scrapers. 4:00 Complete removal - EEG visually inspect removal area, collect Area Samples - Gerken off-site - EEG begin TEM Clearance Samples. Prep & analyze Area Samples. 7:20 Collect Clearance Samples - demobilize equipment. 8:00 EEG off-site.

Contractor Representative / Date

EEG, Inc. Representative / Date

Kendall Shelby 107-09-07



---

**Field Air Sampling and  
TEM Analysis Reports**

---

Benton County School of the Arts  
Benton County School of the Arts  
Sampled By Kendall Shelby  
Calibration By Kendall Shelby

Location of Containment Grade School Bldg - back  
Contractor Gerken Environmental  
Date Sampled 7.9.07  
Method Rotometer

Level of Respiratory Protection  
 1/2 Mask APR  
 Full Face APR  
 PAPR  
 SAR (Demand or Continuous Mode)  
 SAR (Pressure Demand Mode)  
 MFA .00785 25 MM Cassette

General Statements - Flow rate is measured in liters of air per minute (LPM). Field rotometers are calibrated routinely by a primary standard.

| SAMPLE # | LOCATION/WORKER/ACTIVITY        | PUMP NO. | FLOW RATE (LPM) |      | SAMPLING TIME | TOTAL MINUTES | TOTAL VOLUME | FIBERS/FIELDS | FIBER DENSITY | DETECTION LIMIT | FIBER CONC |
|----------|---------------------------------|----------|-----------------|------|---------------|---------------|--------------|---------------|---------------|-----------------|------------|
|          |                                 |          | START           | STOP |               |               |              |               |               |                 |            |
| B-1      | Blank                           |          |                 |      |               |               |              |               |               |                 |            |
| B-2      | Blank                           |          |                 |      |               |               |              |               |               |                 |            |
| AD-3     | Hallway by R's                  |          | 6.2             | 6.2  | 12:22         | 4:08          | 1376.4       | 2/100         | 10.19         | .0036           | <LOQ       |
| AD-4     | West end of Containment         |          | 6.2             | 6.2  | 12:28         | 4:06          | 1351.6       | 3/100         | 3.82          | .0036           | <LOQ       |
| AD-5     | East end of Containment         |          | 6.2             | 6.2  | 12:28         | 4:06          | 1351.6       | 1/100         | 1.27          | .0036           | <LOQ       |
| AD-6     | Hall by Mrs. Freeman's End Gate |          | 6.2             | 6.2  | 12:34         | 4:08          | 1326.8       | 2/100         | 2.55          | .0037           | <LOQ       |
| SH-1-7   | Rocky Pecton                    |          | 2.0             | 2.0  | 12:20         | 12:50         | 6.0          | 1.5/100       | 1.91          | .012            |            |
| P-8      | Rocky Pecton                    |          | 2.0             | 2.0  | 12:50         | 4:00          | 380          | 3/100         | 3.82          | .0039           |            |

Comments \_\_\_\_\_

I certify that the above samples were  collected AND/OR  analysis performed in strict compliance with applicable standards and regulations.

Kendall Shelby Signature Date 7.9.07





# Field Air Sampling and Analysis

Page 2 of 2

07-0111-061

Benton County School of the Arts  
 Location of Containment Grade School Bldg  
 Benton County School of the Arts  
 Contractor Gerken Environmental  
 Sampled By Kendall Shelby  
 Date Sampled 7-9-07  
 Calibration By Kendall Shelby  
 Method Rotometer

Level of Respiratory Protection  
 1/2 Mask APR  
 Full Face APR  
 PAPR  
 SAR (Demand or Continuous Mode)  
 SAR (Pressure Demand Mode)  
 MFA .00785 25 MM Cassette

General Statements - Flow rate is measured in liters per minute (LPM). Field rotometers are calibrated routinely by a primary standard.

| SAMPLE # | LOCATION/WORKER/ACTIVITY | PUMP NO. | FLOW RATE (LPM) |      | SAMPLING TIME |      | TOTAL MINUTES | TOTAL VOLUME | FIBERS/FIELDS | FIBER DENSITY | DETECTION LIMIT | FIBER CONC |
|----------|--------------------------|----------|-----------------|------|---------------|------|---------------|--------------|---------------|---------------|-----------------|------------|
|          |                          |          | START           | STOP | START         | STOP |               |              |               |               |                 |            |
| B-9      | Blank                    |          |                 |      |               |      |               |              |               |               |                 |            |
| B-10     | Blank                    |          |                 |      |               |      |               |              |               |               |                 |            |
| B-11     | Blank                    |          |                 |      |               |      |               |              |               |               |                 |            |
| C-12     | Inside containment       |          | 10:3            | 10:3 | 4:12          | 7:12 | 180           | 1854         |               |               |                 |            |
| C-13     | "                        |          | 10:3            | 10:3 | 4:14          | 7:14 | 180           | 1854         |               |               |                 |            |
| C-14     | "                        |          | 10:3            | 10:3 | 4:14          | 7:14 | 180           | 1854         |               |               |                 |            |
| C-15     | "                        |          | 10:3            | 10:3 | 4:16          | 7:16 | 180           | 1854         |               |               |                 |            |
| C-16     | "                        |          | 10:3            | 10:3 | 4:20          | 7:20 | 180           | 1854         |               |               |                 |            |
| AD-17    | West end Hallway         |          | 10:3            | 10:3 | 4:16          | 7:16 | 180           | 1854         |               |               |                 |            |
| AD-18    | East end Hallway         |          | 10:3            | 10:3 | 4:20          | 7:20 | 180           | 1854         |               |               |                 |            |
| AD-19    | Classrm - Passmore       |          | 10:3            | 10:3 | 4:23          | 7:22 | 179           | 1833.7       |               |               |                 |            |
| AD-20    | Classrm - Passmore       |          | 10:3            | 10:3 | 4:25          | 7:23 | 178           | 1833.4       |               |               |                 |            |
| AD-21    | West end Hallway         |          | 10:3            | 10:3 | 4:30          | 7:17 | 167           | 1720.1       |               |               |                 |            |

I certify that the above samples were  collected AND/OR  analysis performed in strict compliance with applicable standards and regulations.  
Kendall Shelby  
 Signature Date 7-9-07

Comments Analyze Per AHEAD C-17-C-16  
24-hr Total count

CORPORATE OFFICE  
 220 North Knoxville, Suite 200  
 Russellville, AR 72801

(800) 530-7968

FAYETTEVILLE OFFICE  
 2209 Main Drive  
 Fayetteville, AR 72704

**TEM REPORT**

Steve Moody Micro Services, Inc.  
 2051 Valley View Lane  
 Farmers Branch, TX 75234 (972) 241-8460

NVLAP Lab No. 102056  
 TDH License No. 30-0084  
 AIHA PAT ID No. 102577

Client : EEG, Inc.  
 Project : Benton County School of the Arts, Grade School Building  
 Project No. : 07-0111-061  
 Identification : Asbestos, Air Filter Analysis  
 Test Method : Transmission Electron Microscopy/X-Ray Analysis (TEM/EDX)  
 EPA 40 CFR 763

Lab Job No. : x7T-06426  
 Report Date : 07/11/2007  
 Sample Date : 07/09/2007

On 7/11/07, thirteen (13) 25mm air cassette samples were submitted by a representative of EEG, Inc. for asbestos analysis by TEM/EDX. Copies of the lab data sheets are attached; additional information may be found therein. The results are summarized below:

| Sample No. | Sample Description / Location | Sample Volume (liters) | Area Analyzed (mm <sup>2</sup> ) | Total Asbestos Structures | Detection Limit (s/cc) | Asbestos Concentration (s/cc) | Asbestos Concentration (s/mm <sup>2</sup> ) |
|------------|-------------------------------|------------------------|----------------------------------|---------------------------|------------------------|-------------------------------|---|
| C-12       | Inside Containment            | 1854                   | 0.044                            | 1                         | 0.005                  | 0.005                         | 22.7  |
| C-13       | Inside Containment            | 1854                   | 0.044                            | 0                         | 0.005                  | <0.005                        | <22.7                                       |
| C-14       | Inside Containment            | 1854                   | 0.044                            | 0                         | 0.005                  | <0.005                        | <22.7                                       |
| C-15       | Inside Containment            | 1854                   | 0.044                            | 2                         | 0.005                  | 0.009                         | 45.5  |
| C-16       | Inside Containment            | 1854                   | 0.044                            | 0                         | 0.005                  | <0.005                        | <22.7                                       |

Average Asbestos Concentration = 27.3 s/mm<sup>2</sup>

Results may not be reproduced except in full. This test report relates only to the samples tested. These test results do not imply endorsement by NVLAP or any agency of the U.S. Government. Accredited by the National Voluntary Laboratory Accreditation Program for Airborne Asbestos Fiber Analysis under Lab Code 102056.

Analyst : James Blankenship

Laboratory Director : Steve Moody

Approved Signatory :

**NVLAP**

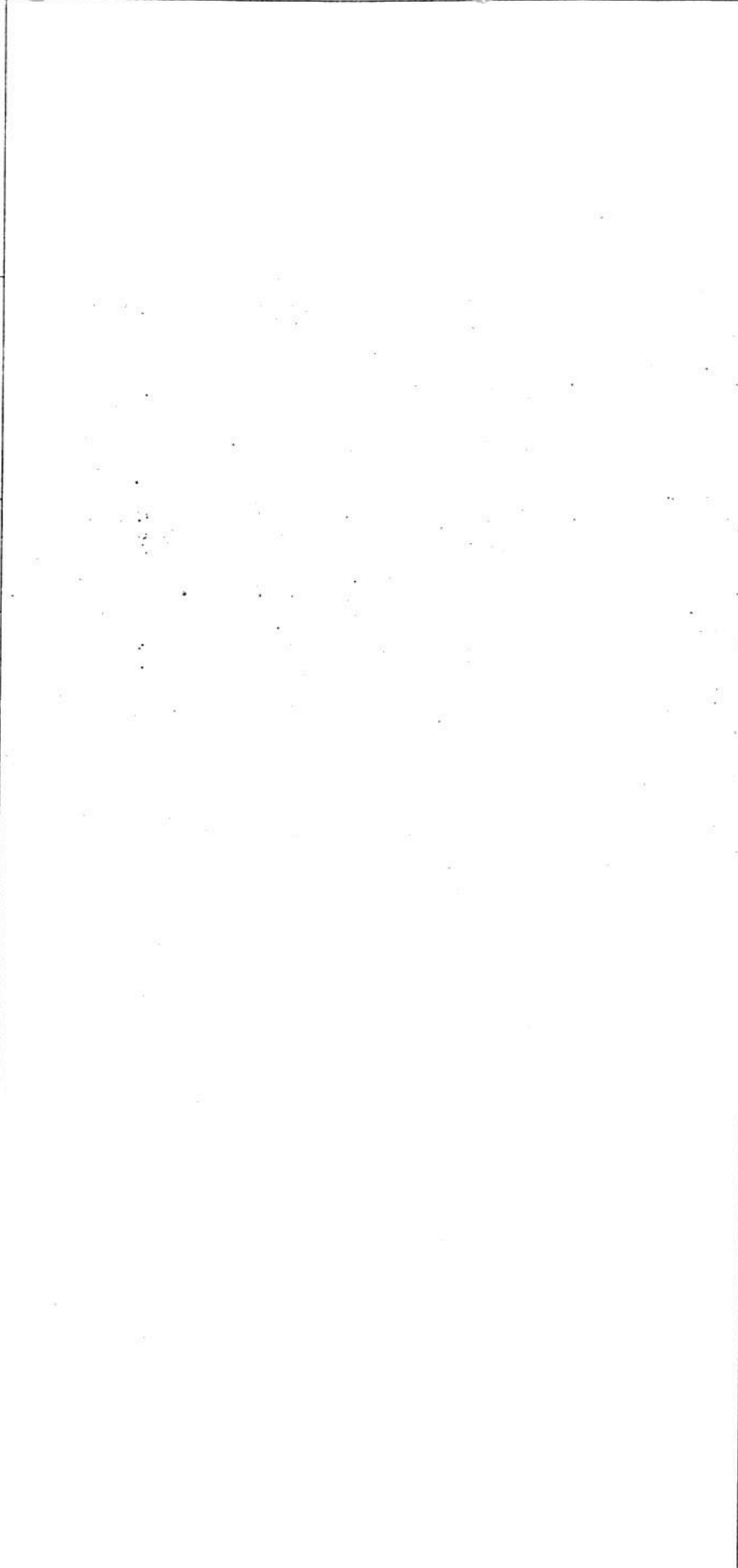




Client: **EEG, Inc.** Filter: **.45 µm/MCE/385 mm²** Asbestos Structures: **1**  
 Project: **Benton County School of the Arts, Grade School Building** Sample Volume / Area: **1854 l** Asbestos Structures: **1 (>5µm)**  
 Lab Job No.: **x7T-06426** Client Sample No.: **C-12** No. of Squares: **4** Detection Limit: **0.005 s/cc**  
 Square Field Area: **0.0110 mm²** Asbestos Concentration: **0.005 s/cc**  
 Total Area Examined: **0.044 mm²** Asbestos Concentration: **22.7 s/mm²**

Sample Description: **Inside Containment**

| Sqr #. | Grid No. | Sqr ID | Struct # | Struct Type | Structure ID | L (µm) | W (µm) | .SAED | Photo ID | EDX        | Spectra ID     |
|--------|----------|--------|----------|-------------|--------------|--------|--------|-------|----------|------------|----------------|
| 1      | 1        | A01    | 1        | Fiber       | Chrysotile   | >5     | NA     | 5.3 Å | 2207     | Si:Mg 10:7 | x7T-06426*C-12 |
| 2      |          | A03    | 0        |             |              |        |        |       |          |            |                |
| 3      | 2        | F01    | 0        |             |              |        |        |       |          |            |                |
| 4      |          | F03    | 0        |             |              |        |        |       |          |            |                |



Comments :

Analyst: **James Blankenship**  
Date Analyzed: **07/11/07**

Scope: **JEOL100** KV: **100** Mag: **15,405**

Lab Job #: **x7T-06426** Sample No.: **C-12**

Client: **EEG, Inc.**  
 Project: **Benton County School of the Arts, Grade School Building**  
 Lab Job No.: **x7T-06426** Client Sample No.: **C-13**

Filter: **.45 µm/MCE/385 mm<sup>2</sup>** Asbestos Structures: **0**  
 Sample Volume / Area: **1854 l** Asbestos Structures: **0 (>5µm)**  
 No. of Squares: **4** Detection Limit: **0.005 s/cc**  
 Square Field Area: **0.0110 mm<sup>2</sup>** Asbestos Concentration: **<0.005 s/cc**  
 Total Area Examined: **0.044 mm<sup>2</sup>** Asbestos Concentration: **<22.7 s/mm<sup>2</sup>**

Sample Description: **Inside Containment**

| Sqr #. | Grid No. | Sqr ID | Struct # | Struct Type | Structure ID | L (µm) | W (µm) | SAED | Photo ID | EDX | Spectra ID |
|--------|----------|--------|----------|-------------|--------------|--------|--------|------|----------|-----|------------|
| 1      |          | B03    | 0        |             |              |        |        |      |          |     |            |
| 2      |          | B05    | 0        |             |              |        |        |      |          |     |            |
| 3      |          | G04    | 0        |             |              |        |        |      |          |     |            |
| 4      |          | G06    | 0        |             |              |        |        |      |          |     |            |

Comments :

Analyst: **James Blankenship**  
 Date Analyzed: **07/11/07**

Scope: **JEOL100** KV: **100** Mag: **15,405**

Lab Job #: **x7T-06426** Sample No.: **C-13**



Client: **EEG, Inc.**  
 Project: **Benton County School of the Arts, Grade School Building**  
 Lab Job No.: **x7T-06426** Client Sample No.: **C-14**

Filter: **.45 µm/MCE/385 mm<sup>2</sup>** Asbestos Structures: **0**  
 Sample Volume / Area: **1854 l** Asbestos Structures: **0 (>5µm)**  
 No. of Squares: **4** Detection Limit: **0.005 s/cc**  
 Square Field Area: **0.0110 mm<sup>2</sup>** Asbestos Concentration: **<0.005 s/cc**  
 Total Area Examined: **0.044 mm<sup>2</sup>** Asbestos Concentration: **<22.7 s/mm<sup>2</sup>**

Sample Description: **Inside Containmentment**

| Sqr #. | Grid No. | Sqr ID | Struct # | Struct Type | Structure ID | L (µm) | W (µm) | SAED | Photo ID | EDX | Spectra ID |
|--------|----------|--------|----------|-------------|--------------|--------|--------|------|----------|-----|------------|
| 1      |          | C01    | 0        |             |              |        |        |      |          |     |            |
| 2      |          | C03    | 0        |             |              |        |        |      |          |     |            |
| 3      |          | H02    | 0        |             |              |        |        |      |          |     |            |
| 4      |          | H04    | 0        |             |              |        |        |      |          |     |            |

Comments :

Analyst : **James Blankenship**  
 Date Analyzed : **07/11/07**

Scope : **JEOL100** KV : **100** Mag : **15,405**

Lab Job # : **x7T-06426** Sample No. : **C-14**

Client : **EEG, Inc.**  
 Project : **Benton County School of the Arts, Grade School Building**  
 Lab Job No. : **x7T-06426** Client Sample No. : **C-15**

Filter : **.45 µm/MCE/385 mm<sup>2</sup>** Asbestos Structures : **2**  
 Sample Volume / Area : **1854 l** Asbestos Structures : **0 (>5µm)**  
 No. of Squares : **4** Detection Limit : **0.005 s/cc**  
 Square Field Area : **0.0110 mm<sup>2</sup>** Asbestos Concentration : **0.009 s/cc**  
 Total Area Examined : **0.044 mm<sup>2</sup>** Asbestos Concentration : **45.5 s/mm<sup>2</sup>**

Sample Description : **Inside Containment**

| Sqr #. | Grid No. | Sqr ID | Struct # | Struct Type | Structure ID | L (µm) | W (µm) | SAED | Photo ID | EDX | Spectra ID |
|--------|----------|--------|----------|-------------|--------------|--------|--------|------|----------|-----|------------|
| 1      | 1        | D02    | 0        |             |              |        |        |      |          |     |            |
| 2      | 2        | D04    | 0        |             |              |        |        |      |          |     |            |
| 3      | 2        | I01    | 0        |             |              |        |        |      |          |     |            |
| 4      |          | I03    | 1        | Fiber       | Chrysotile   | <5     | NA     |      |          |     |            |
|        |          |        | 2        | Fiber       | Chrysotile   | <5     | NA     |      |          |     |            |

Comments :

Analyst : **James Blankenship**  
 Date Analyzed : **07/11/07**

Scope : **JEOL100** KV : **100** Mag : **15,405** Lab Job # : **x7T-06426** Sample No. : **C-15**



Client : **EEG, Inc.**  
 Project : **Benton County School of the Arts, Grade School Building**  
 Lab Job No. : **x7T-06426** Client Sample No. : **C-16**

Filter : **.45 µm/MCE/385 mm<sup>2</sup>**  
 Sample Volume / Area : **1854 l**  
 No. of Squares : **4**  
 Square Field Area : **0.0110 mm<sup>2</sup>**  
 Total Area Examined : **0.044 mm<sup>2</sup>**  
 Asbestos Structures : **0**  
 Asbestos Structures : **0 (>5µm)**  
 Detection Limit : **0.005 s/cc**  
 Asbestos Concentration : **<0.005 s/cc**  
 Asbestos Concentration : **<22.7 s/mm<sup>2</sup>**

Sample Description : **Inside Containment**

| Sqr #. | Grid No. | Sqr ID | Struct # | Struct Type | Structure ID | L (µm) | W (µm) | SAED | Photo ID | EDX | Spectra ID |
|--------|----------|--------|----------|-------------|--------------|--------|--------|------|----------|-----|------------|
| 1      | 1        | E01    | 0        |             |              |        |        |      |          |     |            |
| 2      | 2        | E03    | 0        |             |              |        |        |      |          |     |            |
| 3      | 2        | J02    | 0        |             |              |        |        |      |          |     |            |
| 4      | 2        | J04    | 0        |             |              |        |        |      |          |     |            |

Comments :

Analyst : **James Blankenship**  
 Date Analyzed : **07/11/07**

Scope : **JEOL100** KV : **100** Mag : **15,405** Lab Job # : **x7T-06426** Sample No. : **C-16**



# Field Air Sampling and Analysis

Page 2 of 2

07-0111-061

77-06426 TEM13

Benton County School of the Arts  
 Benton County School of the Arts  
 Sampled By Kendall Shelby  
 Calibration By Kendall Shelby

Location of Containment Grade School Bldg  
 Contractor Getko Environmental  
 Date Sampled 7-9-07  
 Method Robometer

Level of Respiratory Protection  
 1/2 Mask APR  
 Full Face APR  
 PAPR  
 SAR (Demand or Continuous Mode)  
 SAR (Pressure Demand Mode)  
 MFA 00785 25 MM Cassette

General Statements - Flow rate is measured in liters of air per minute (LPM). Field robometers are calibrated routinely by a primary standard.

| SAMPLE # | LOCATION/WORKER/ACTIVITY | PUMP NO. | FLOW RATE (LPM) |      | SAMPLING TIME |       | TOTAL MINUTES | TOTAL VOLUME | FIBERS/FIELDS | FIBER DENSITY | DETECTION LIMIT | FIBER CONC |
|----------|--------------------------|----------|-----------------|------|---------------|-------|---------------|--------------|---------------|---------------|-----------------|------------|
|          |                          |          | START           | STOP | AVG           | START |               |              |               |               |                 |            |
| B-9      | Blank                    |          |                 |      |               |       |               |              |               |               |                 |            |
| B-10     | Blank                    |          |                 |      |               |       |               |              |               |               |                 |            |
| B-11     | Blank                    |          |                 |      |               |       |               |              |               |               |                 |            |
| C-12     | Inside Containment       |          | 10:3            | 10:3 | 10:3          | 4:12  | 7:12          | 180          | 1854          |               |                 |            |
| C-13     | "                        |          | 10:3            | 10:3 | 10:3          | 4:14  | 7:14          | 180          | 1854          |               |                 |            |
| C-14     | "                        |          | 10:3            | 10:3 | 10:3          | 4:14  | 7:14          | 180          | 1854          |               |                 |            |
| C-15     | "                        |          | 10:3            | 10:3 | 10:3          | 4:16  | 7:16          | 180          | 1854          |               |                 |            |
| C-16     | "                        |          | 10:3            | 10:3 | 10:3          | 4:20  | 7:12          | 180          | 1854          |               |                 |            |
| AD-17    | West end Hallway         |          | 10:3            | 10:3 | 10:3          | 4:16  | 7:16          | 180          | 1854          |               |                 |            |
| AD-18    | East end Hallway         |          | 10:3            | 10:3 | 10:3          | 4:20  | 7:10          | 180          | 1854          |               |                 |            |
| AD-19    | Classrm - Passway        |          | 10:3            | 10:3 | 10:3          | 4:23  | 7:12          | 179          | 1843.7        |               |                 |            |
| AD-20    | Classrm - Passway        |          | 10:3            | 10:3 | 10:3          | 4:25  | 7:13          | 178          | 1833.4        |               |                 |            |
| AD-21    | West end Hallway         |          | 10:3            | 10:3 | 10:3          | 4:30  | 7:17          | 167          | 1720.1        |               |                 |            |

I certify that the above samples were  collected AND/OR  analysis performed in strict compliance with applicable standards and regulations.  
Kendall Shelby Signature  
 7-9-07 Date

Comments Analyze per MHELA C-12-C-16  
24-hr Turnaround

RECEIVED  
 JUL 11 2007 9:25am  
 BY: Good Shms

CORPORATE OFFICE  
 220 North Knoxville, Suite 200  
 Russellville, AR 72801

FAYETTEVILLE OFFICE  
 2209 Main Drive  
 Fayetteville, AR 72704



---

**Abatement Project Visual Inspection  
& Clearance Sampling Report**

---



Environmental  
Enterprise Group, Inc.

# Abatement Project

## Visual Inspection / Clearance Sampling Report

07-0111-061

CLIENT Benton County School of the Arts  
PROPERTY Benton County School of the Arts

Location of Containment Grade School bldg Hallway (refer to cleaning inspection)  
EEG Representative Kendall Shelby  
Contractor Name Gerken Environmental  
Contractor Superintendent Armando Garcia  
Time and Date of Inspection 4:00 am  7-9-07  
Respirator Type in Use  Half-Face  Full-Face  PAPR  Type Brand North  
Protective Clothing Procedures Tyvek suit

### I. Visual Inspection

**DEFICIENCIES**

**CORRECTED**

None

### II. Clearance Sampling

A. Aggressive Sampling Method Used Leaf Blower  
B. Method of Analysis to be Employed  TEM or  PCM  
Number of Samples Collected 13 Analyzed \_\_\_\_\_  
Minimum Total Liters Collected Per Sample \_\_\_\_\_

Contractor Representative Kendall Shelby Date \_\_\_\_\_  
EEG, Inc. Representative \_\_\_\_\_ Date \_\_\_\_\_

---

---

**Clearance of Project**

---

---



## Clearance of Project

07-0111-061

CLIENT Benton County School of the Arts  
PROPERTY Benton County School of the Arts

On 7-9-07, EEG, Inc. representative Kendall Shelby  
visually inspected the Hallway (containment area)  
on the Benton Co. School of the Arts project. The area was  approved  disapproved for clearance  
sampling. Aggressive clearance sampling was performed by Kendall Shelby  
of EEG, Inc. on 7-9-07 from 4:12  am  pm  
to 7:12  am  pm.

The samples were analyzed by  PCM  TEM at Steve Moody Microservices laboratory.  
The results of the analysis for the samples  met  did not meet the clearance criteria of  
< 70 s/m<sup>2</sup>. The analysis was performed by Steve Moody Microservices  
on 7-12-07.

Based on the visual inspection of the work area and clearance sample results, the project is  
accepted as complete upon submission and acceptance of the project closeout documents.

Kendall Shelby  
Signature

7-12-07  
Date

---

---

## Accreditations

---

---



State of Arkansas  
Department of  
Environmental Quality



011484 KENDALL SHELBY

having satisfied the requirements necessary to meet the provisions of AHERA/ASHARA under TSCA Title II and the Arkansas Pollution Control and Ecology Commission's Regulation 21 and is hereby certified in the State of Arkansas in the discipline(s) of Asbestos

Air Monitor 12/31/2007

Inspector 7/31/2007

Management Planner 11/30/2007

Issue Date: 19-Dec-2006

Project Designer 10/31/2007

*Denise Chasingor*  
Agency Program Coordinator  
Air Division - Asbestos Program