

**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

**Renovation Firm:** Greenbuild Design & Construction LLC  
**EPA Certification No.:** NAT-F190683-1  
Expired on August 24, 2023

**Firm Address:** 11221 Olive Lane  
Anchorage, Alaska 99515

**Firm Majority Owners:** Rodrigo A. von Mareés, Owner  
**Owner Address:** 2232 Culver Place  
Anchorage, Alaska 99503

**Firm Contact:** Rodrigo A. von Mareés, Owner  
**Owner Cell #:** (541) 977-1800 (cell)  
**Firm Phone #:** (907) 341-3366  
**Firm Email:** rad@greenbuild.us.com

**Renovation Site:** 2208 Turnagain Parkway  
Anchorage, Alaska 99517

**Renovator Certification:**  
**EPA Certification No.:**

**Announced Inspection**

**Unannounced Inspection**

**Inspection Date:** July 25, 2018

**Start Time:** 11:46 a.m.      **Finish Time:** 1:00 p.m.

**Latitude:** 61.199558

**Longitude:** -149.912072

**EPA Inspector(s):**

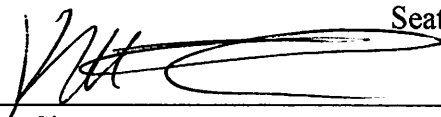
Rob Hamlet  
(206) 553-6349  
[hamlet.rob@epa.gov](mailto:hamlet.rob@epa.gov)

Kim Farnham  
(206) 553-6697  
[farnham.kim@epa.gov](mailto:farnham.kim@epa.gov)

**Inspection Report Prepared By:** Kim Farnham  
TSCA Inspector  
Office of Compliance and Enforcement  
EPA Region 10

**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

Seattle, Washington

  
\_\_\_\_\_  
Inspector Signature

Date: 1/27/19

  
\_\_\_\_\_  
QA Reviewer

Date: 1/30/19

**Introduction**

The U.S. Environmental Protection Agency (EPA) is conducting inspections of renovation firms to monitor compliance with the EPA-credentialed Lead Renovation, Repair, and Painting (RRP) Rule promulgated under the Toxic Substances Control Act (TSCA) Section 402(c). As part of the Region 10 compliance inspection program, I inspected a renovation firm identified as Greenbuild Design & Construction LLC located at 2232 Culver Place, Anchorage, Alaska on July 25, 2018. The purpose of the inspection was to determine compliance with the work practice standard, recordkeeping and reporting requirements as required in 40 C.F.R. § 745 Subpart E. Region 10 located the renovation firm by a permit pulled by Greenbuild Design & Construction LLC. The scope of this inspection was to observe the work practice standard, and the recordkeeping and reporting requirements before and after the renovation work performed by Greenbuild Design & Construction LLC.

This report is a summary of observations and information gathered from Rodrigo A. von Mareés, and Greenbuild Design & Construction LLC at the time of the inspection. The information provided does not constitute a final decision on compliance with TSCA regulations, nor is it meant to be a comprehensive summary of all activities conducted by Greenbuild Design & Construction LLC (Greenbuild Design).

**Inspection Narrative**

**Firm Background**

Greenbuild Design filed Articles of Incorporation with the Alaska Department of Commerce, Community, and Economic Development Corporations, Business and Professional Licensing on September 24, 2014. Status is active and mailing address is 11221 Olive Lane, Anchorage, Alaska. Primary line of business is construction.  
<https://www.commerce.alaska.gov/cbp/main/search/businesses>

**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

**Pre-Inspection**

Permit #R18-1823 was pulled on June 13, 2018, for property located at 2208 Turnagain Parkway, Anchorage, Alaska. The scope of work is listed as drywall, electric, plumbing, also repair roof which indicates renovation work was being performed.

**Arrival and Opening Conference**

Rob Hamlet and I arrived at the active renovation site located at 2208 Turnagain Parkway, Anchorage, Alaska on July 25, 2018, at 11:46 a.m. We met with Rodrigo A. von Mareés, Owner, for Greenbuild Design. We presented our credentials and exchanged business cards.

I explained the Notice of Inspection (EPA Form 7740-3 – Attachment A) and requested that Mr. von Mareés sign the document. After reading the document, Mr. von Mareés signed the Notice of Inspection. The Inspection Confidentiality Notice (EPA Form 7740-4 – Attachment B) and the Receipt for Samples and Documents (EPA Form 7740-1) was not signed during the inspection, because no recordkeeping documents was available or collected during the onsite inspection.

Mr. von Mareés was provided copies of the *Renovate Right Pamphlet*, the *Steps to Lead Safe RRP Pamphlet*, the *U.S. EPA Small Business Resources Information Sheet*, and applicable RRP forms (Lead Test Kit Documentation, Certified Renovator Participant Progress Log, Pre-Notification Documentation, and the Post-Renovation Recordkeeping Checklist).

**Target Property**

Property locate at 2208 Turnagain Parkway, Anchorage, Alaska is a 3-bedroom, 3-bathroom, 1,584 square feet single family home that was built in 1953.

[https://www.zillow.com/homedetails/2208-Turnagain-Pkwy-Anchorage-AK-99517/1925\\_zpid/](https://www.zillow.com/homedetails/2208-Turnagain-Pkwy-Anchorage-AK-99517/1925_zpid/)

The RRP Rule does apply for target property located above.



**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**



**EPA/State Certification Information**

At time of inspection on July 25, 2018, Greenbuild Design & Construction LLC was not RRP firm nor renovator certified. This was confirmed during the inspection by Mr. von Mareés, Owner, Greenbuild Design.

Rodrigo A. von Mareés, Owner, Greenbuild Design, applied for the RRP firm certification on August 9, 2018, and the certification was issued on August 10, 2018. As of September 19, 2018, Greenbuild Design did not have a certified renovator.

| <b>Name</b>                          | <b>Cert #</b> | <b>Expiration Date</b> |
|--------------------------------------|---------------|------------------------|
| Greenbuild Design & Construction LLC | NAT-F190683-1 | August 24, 2023        |
|                                      |               |                        |

**Information Gathered During the Inspection**

At the time of the inspection, I went over the requirements under EPA’s RRP Rule. Mr. von Mareés was advised that if he and his company continued to work on pre-1978 residences and/or child occupied facilities, then the company would need to be firm certified and the firm was required to assign a certified renovator and train non-certified workers for all pre-1978 renovation jobs as required by the RRP Rule. I went over the procedures needed to obtain a Firm Certification through EPA and provided Mr. von Mareés with a list of nearby training providers that offer the 8-hour Renovator Initial Class. Additionally, Mr. von Mareés was advised that the Certified Firm is responsible for keeping records including the pre-renovation education documentation, and all documentation of lead-based paint determination made, training and certification records and cleaning verification records for each pre-1978 jobs completed.

**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

Mr. von Mareés confirmed that Greenbuild Design & Construction LLC had one full time employee and has been in business since 2004. The business is physically located at 11221 Olive Lane, Anchorage, Alaska but there has been some difficulty with getting mail delivered to this address.

The renovation work began about 2-weeks prior to July 25, 2018. Mr. von Mareés stated that Greenbuild Design replaced the siding, but that the siding was replaced over the old siding, so no paint was disturbed during the installation. He demolished all interior wood panels that was throughout the whole house, which was not painted so he made the statement that no paint was disturbed during removal. Mr. von Mareés stated that the upstairs ceiling drywall was tested prior to being demolished using the lead checks that was negative. However, when Mr. von Mareés was asked about the documentation, he confirmed that he did not take any pictures and did not have any documentation showing the negative results.

Mr. von Mareés confirmed during the inspection that he was not a certified renovator when he made the determination prior to removing the ceiling drywall.

Mr. von Mareés was informed that it was the responsibility of a certified renovator to test each component to make the determination prior to any demolition activity.

- Greenbuild Design has the contract with the property owner of 2208 Turnagain Parkway, Anchorage, Alaska, therefore the company is the general contractor.
- Mr. von Mareés confirmed that he did hire subcontractors for painting, plumbing, roofing, and electrical work.
- Mr. von Mareés stated that he did not have any contracts with the subcontractors with the current renovation, but that he was paying them for their services.
- Mr. von Mareés confirmed that the property was vacant during all the renovation.
- When asked which company was doing the pressure washing during the onsite inspection, Mr. von Mareés stated that it was C & C Contracting’s employees pressure washing.
- The roofing was replaced on top of the old roofing by AK Certified Roofing LLC.

Mr. von Mareés provided a list of his subcontractors during the onsite inspection which is listed below.

| <b>Subcontractor</b>             | <b>Address</b>   | <b>Contact</b>           | <b>Phone #</b> | <b>RRP Cert</b> |
|----------------------------------|--|--------------------------|----------------|-----------------|
| Cassidy's Plumbing & Heating LLC | 6651 Wes Way, Anchorage, AK 99518<br><br>PO Box 11278, Anchorage, AK 99511 | cassidysplumbing@aol.com | (907) 522-8126 | No              |
| Powertec Electric LLC            | 22709 Oak Knoll Drive, Chugiak, AK 99567                                   | Matt                     | (907) 317-4336 | No              |

**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

|                          |   |                          |                |    |
|--------------------------|---|--------------------------|----------------|----|
|                          | Anchorage, AK 99503<br>PO BOX 670543, Chugiak, AK 99567   |                          |                |    |
| C & C Contracting        | 401 W International Airport Road #31, Anchorage, AK 99518<br><br>4440 Raspberry Road, Anchorage, AK 99202 | camronglenn@yahoo.com    | (907) 885-4422 | No |
| ADC Services Inc         | 7505 Bern Street, Anchorage, AK<br><br>PO Box 244374, Anchorage, AK 99524                                 | Alex Del-Callejo - Owner |                | No |
| 907 Plumbing             | 24966 Lucky Shot Trail, Willow, AK 99688<br><br>PO Box 742, Willow, AK 99688                              | John Riley               | (907) 529-1560 | No |
| AK Certified Roofing LLC | 6463 Thurman Drive, Anchorage, AK 99502<br><br>PO Box 190591, Anchorage, AK 99519                         |                          | (907) 317-9065 | No |

**Onsite Inspection**

On Initial observation the property located at 2208 Turnagain Parkway, Anchorage, Alaska, was not contained during the active renovation. There were no signs posted, no containment, and the back of the house was being pressure washed. The active pressure washing could be heard and seen from the street of the target property.



**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**



July 25, 2018, Photo 20180725\_115121.jpg



July 25, 2018, Photo 20180725\_115135.jpg

Photo 20180725\_115121.jpg taken July 25, 2018 at 11:51 a.m. is a picture of the work truck owned by Greenbuild Design, parked on the street near the active renovation site located at 2208 Turnagain, Anchorage, Alaska. Photo 20180725\_115135.jpg taken July 25, 2018 at 11:51 a.m. is a picture of the work trailer owned by Greenbuild Design parked in the driveway of the target property.



July 25, 2018, Photo 20180725\_115646.jpg



July 25, 2018, Photo 20180725\_115648.jpg



**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

Photo 20180725\_115646.jpg taken July 25, 2018 at 11:56 a.m. during the onsite inspection for property located at 2208 Turnagain, Anchorage, Alaska shows the water mist that can be seen spraying above the roof from the backyard towards the front of the house during the active pressure washing that could be heard from the street. The photograph also shows a worker on the right side of the target property during the active pressure washing. Photo 20180725\_115648.jpg taken July 25, 2018 at 11:56 a.m. shows water mist going above the roof from the active pressure washing being completed from the backyard of the target property during the inspection. The photograph also shows a worker on the right side of the target property during the active pressure washing.



July 25, 2018, Photo 20180725\_115707.jpg



July 25, 2018, Photo 20180725\_115932.jpg

Photo 20180725\_115707.jpg taken July 25, 2018 at 11:57 a.m. shows water mist from the backyard of the target property going above the roof towards the front of the property during the active pressure washing at property located at 2208 Turnagain, Anchorage, Alaska during the onsite inspection. The photograph shows a worker walking in the backyard. Photo 20180725\_115932.jpg taken July 25, 2018 at 11:59 a.m. shows water mist from the active pressure washing in the backyard of the target property during the onsite inspection. The photograph also shows a worker behind the house while the target property during the pressure washing. The photograph is evidence showing there is no containment being utilized during the pressure washing, and no signs posted during the active renovation work.



**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**



July 25, 2018, Photo 20180725\_120029.jpg



July 25, 2018, Photo 20180725\_120057.jpg

Photo 20180725\_120029.jpg taken July 25, 2018 at 12:00 p.m. shows visible paint chips on bare ground in front of the property to the right of the front porch close to the foundation located at 2208 Turnagain, Anchorage, Alaska. The photograph indicates that no containment was utilized during active renovation work. Photo 20180725\_120057.jpg taken July 25, 2018 at 12:00 p.m. shows visible paint chips on bare ground close to the foundation to the left side of the front porch of the same property. The photograph indicates that no containment was utilized during active renovation work.



July 25, 2018, Photo 20180725\_120105.jpg



July 25, 2018, Photo 20180725\_120128.jpg

Photo 20180725\_120105.jpg taken July 25, 2018 at 12:01 p.m. shows visible paint chips on bare ground to the left of the house next to the foundation of target property located at 2208 Turnagain, Anchorage, Alaska. The photograph indicates that no containment was utilized

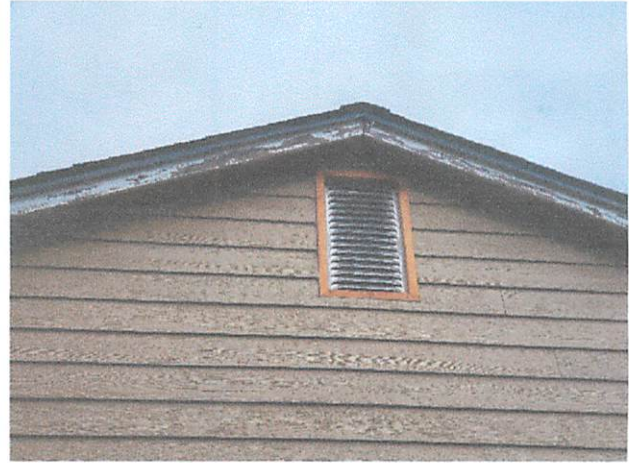


**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

during active renovation work. Photo 20180725\_120128.jpg taken July 25, 2018 at 12:01 p.m. shows active pressure washing in backyard of target property during the onsite inspection. The photograph shows three workers performing active renovation work during the inspection. The photograph shows that no containment is being utilized during the active renovation work.



July 25, 2018, Photo 20180725\_120145.jpg



July 25, 2018, Photo 20180725\_120152.jpg

Photo 20180725\_120145.jpg taken July 25, 2018 at 12:01 p.m. shows trimming that looks to have been prepped for painting by scraping the paint off. The trimming is located on the left side towards the backyard of the target property located at 2208 Turnagain, Anchorage, Alaska. Photo 20180725\_120152.jpg taken July 25, 2018 at 12:01 p.m. shows the full trimming that looks to have been prepped for painting by scraping the paint off. The trimming is located on the left side of the target property



July 25, 2018, Photo 20180725\_120227.jpg



July 25, 2018, Photo 20180725\_120221.jpg

## **TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS INSPECTION REPORT**

Photo 20180725\_120227.jpg taken July 25, 2018 at 12:02 p.m. shows trimming that looks to have been prepped for painting by scraping the paint off. The trimming is located on the back of the house above the window of target property located at 2208 Turnagain, Anchorage, Alaska. Photo 20180725\_120227.jpg taken July 25, 2018 taken 12:02 p.m. shows paint chips on bare ground to the right side of the target property close to the driveway. The photograph shows that no containment was utilized during the active renovation work.

### **Recordkeeping Review During Inspection**

No records were available during the onsite inspection.

### **Closing Conference**

During the closing conference, I discussed with Mr. von Mareés EPA's observations and potential areas of concerns with the work practice standard and recordkeeping requirements. I also discussed the process after the inspection is completed and explained that after all information has been reviewed and evaluated, that an EPA Compliance Officer will be notifying the company of EPA's determination on whether or not any further action is needed.

### **Additional Information Gathered After the Inspection**

**August 9, 2018** - Rodrigo A. von Mareés, Owner, Greenbuild Design, applied for the EPA RRP firm certification on August 9, 2018, and the certification was issued on August 10, 2018.

**September 6, 2018** - Rodrigo A. von Mareés, Owner, Greenbuild Design, confirmed that he registered for the RRP Renovator initial class on October 16, 2018.

**October 29, 2018** - Mr. Rodrigo A. von Mareés, confirmed his subcontractors as PowerTec electric (907) 317-4336 (Matt); 907 Plumbing & heating (907) 529-1560 (Everett), stating "All the rest of work is done by GreenBuild."

**December 28, 2018** – The EPA requested a copy of the renovator certification and Mr. von Mareés, Owner, Greenbuild Design Greenbuild Design stated that he sent it to EPA after he had completed the class.

### **Attachments**

- A. Lead Paint-Notice of Inspection



**TSCA SECTION 402(c) – RECORDKEEPING / WORK PRACTICE STANDARDS  
INSPECTION REPORT**

- B. Firm Certificate
- C. Greenbuild Design Business License
- D. Permit
- E. Subcontractor's Business License
- F. Notice of Inspection
- G. Advisory Letter; April 25, 2018

**Laws, Regulations, Authority:**

- 40 C.F.R. § 745.82 – RRP Rule Applicability & Exclusions
- 40 C.F.R. § 745.90 – Renovator Requirements
- 40 C.F.R. § 745.87 – Enforcement and inspections
- 40 C.F.R. § 745.86 - Recordkeeping and reporting requirements