To: Thomi, Wendy[Thomi.Wendy@epa.gov]
From: Peronard, Paul
Sent: Mon 8/4/2014 11:18:41 PM
Subject: RE: Billings Library Demo Project

Hey Wendy,

I'm up in Williston, ND this week. Call on my cell (303) 886-1638 if something comes in.

paul

From: Thomi, Wendy
Sent: Monday, August 04, 2014 8:27 AM
To: Peronard, Paul
Subject: FW: Billings Library Demo Project

From: Kris Koessl [mailto:kkoessl@aearchitects.com]
Sent: Friday, August 01, 2014 1:31 PM
To: Thomi, Wendy
Cc: Cochran, Bill
Subject: FW: Billings Library Demo Project

Hi Wendy, could you please forward this to Paul?

I am getting even more frustrated, as they just continue to ask more questions instead of giving answers.

Thanks,
Kris

From: Kris Koessl
Sent: Friday, August 01, 2014 1:30 PM
To: 'Grimm, Deborah'
Cc: Cochran, Bill; Volek, Christina; Brooks, Brent; Alheim, Larry; Hall, Mark (DEQ); Anderson, Chad; 'Don <dono@o2architects.net> (dono@o2architects.net)'; Mike Chase; Greg Hebner; rc@safetechmontana.com; Leonard Cranford; Thamke, Ed; 'Kevin Oliver'; Benoit, John; Kurvink, Greg
Subject: RE: Billings Library Demo Project

Deb,

Please see my response to your questions below in red.

From: Grimm, Deborah [mailto:DGrimm@mt.gov]
Sent: Friday, August 01, 2014 12:38 PM
To: Kris Koessl
Cc: Cochran, Bill; Volek, Christina; Brooks, Brent; Alheim, Larry; Hall, Mark (DEQ); Anderson, Chad; 'Don <dono@o2architects.net> (dono@o2architects.net)'; Mike Chase; Greg Hebner; rc@safetechmontana.com; Leonard Cranford; Thamke, Ed; 'Kevin Oliver'; L M Excavating, Inc. (lmexcavatinginc@montanasky.net); Benoit, John; Kurvink, Greg
Subject: Billings Library Demo Project

Kris,

Thank you for meeting with the DEQ Asbestos Control Program (ACP) on July 30, 2014. Yesterday morning the ACP met with the DEQ Solid Waste and Enforcement programs to discuss your requests for additional cooperation and guidance, your immediate project concerns, and the contract submittals pertaining to the ongoing cleanup and future demolition of the Billings Public Library. In order to address your question regarding the remaining demolition activities, "… if this determination is made, would the building be allowed to be cleaned, rather than demolished and hauled off as asbestos-containing.", we need to review the following information:

1.) Your detailed work plan, including but not limited to, plans for the asbestos currently in the building, work practices to be used during demolition, waste management procedures, a copy of the current demolition disclosure document, and a description of work practices and engineering controls to prevent emissions of asbestos at the demolition site (required information on the NESHAP demolition notification). I thought I had laid out our plan fairly simply this morning and per our meeting. Per the Violation Letter, we will be removing all remaining, existing debris from the site. The sheer machine is clipping hanging debris to make the site safe. Safetech will push all debris off leading edges to the ground level. This debris, and all basement

debris will be removed as asbestos-contaminated waste per your previous determination. Safetech will clean all areas and use a vacuum truck to ensure all potential asbestos-containing material and debris is removed from the site. At this point, we will perform #3 below.

JCG has the most recent demolition plan as submitted by Vertex Consulting. Mike and/or Greg, could you please provide a copy of that to the DEQ?

Through our sampling and testing, we know there are two remaining Category I materials in the standing portion of the building, glue pucks on 1st Floor columns and floor mastic on 4th Floor.

In our interpretation of NESHAP, these can remain in the building as they are demolished in buildings routinely, assuming the demolition contractor uses proper demolition practices.

If your determination is that these need to be removed prior to demolition commencing, then we will abate these two materials and have a asbestos free building to be demo'd.

Can you please answer the question of determining if all current debris is removed from site, can we continue with the demolition of the standing portion of the building as General Construction Waste? I am not going to have myself and/or consultants, contractors, etc. waste their time putting together all of this information when your determination could completely change that scope of work and require a completely different plan. You have every bit of information that is available, please answer the questions that have been asked of your department.

2.) A single summary report, chronologically listing all sampling events, locations and analytical results from the 12/04/13 inspection report to the present. The consolidation of the more than nearly a dozen asbestos sampling events will assure the ACP has all of the sampling data and will expedite our review and will facilitate the review needed by the abatement and demolition contractors. I am not sure what this will accomplish. I have sent every single report to the DEQ through multiple requests. I would be happy to electronically bind all of the reports together into one document, but am afraid that would be much too large to email. You have all of the reports, so I don't understand why this is necessary.

3.) A copy of the final visual inspection for the current cleanup project (MTP14-0115-00) completed by a MT accredited independent third party contractor will be needed prior to the start of the next phase of the project. This will be performed per State requirements.

Please provide us a contact name and number that we may refer callers to who have inquiries on

this project. I would be happy to field any inquiries on this project and get people in touch with the appropriate party.

If you have questions, please contact me.

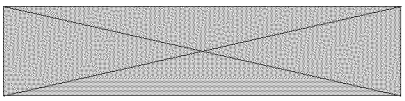
Sincerely,

Deb Grimm, CIH, Program Manager

Asbestos Control / Meth Cleanup Program

406-444-2690 Fax: 406-444-1374

dgrimm@mt.gov

http://www.asbestos.mt.gov/ ---- http://deq.mt.gov/Meth/index.mcpxp

Got List Serve? Sign up for ACP news List Serve at
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