



**Asbestos and Lead-Based Paint  
Abatement Completion Report  
Heart Butte Government Square  
Heart Butte, Montana**



*Blackfeet  
Environmental  
Office*



 **NewFields**  
*February 2021*

February 1, 2021

Mr. Shawn Lahr  
Brownfields Coordinator  
Blackfeet Environmental Office  
Blackfeet Tribe Brownfields Program

**Subject: Asbestos and Lead-Based Paint Abatement Completion Report  
Heart Butte Government Square, Government Square Loop  
Heart Butte, Pondera County, Montana**

Dear Mr. Lahr:

NewFields is pleased to provide this Asbestos and Lead-Based Paint (LBP) Completion Report documenting the abatement work completed on the Heart Butte Government Square - Government Square Loop (HBGS) Project in Heart Butte, Montana. Asbestos and LBP abatement work was completed by Abatement Contractors of Montana (ACM) using grant funds from the U.S. Environmental Protection Agency (EPA). NewFields oversaw ACM to ensure that all abatement work was completed in accordance with current EPA and State of Montana Department of Environmental Quality (DEQ) regulations, consistent with the EPA-approved Cleanup Plan for Asbestos and Lead-based Paint Abatement (NewFields, 2020b).

## **PROJECT DESCRIPTION**

HBGS is located just east of the intersection of Heart Butte Road and Spotted Eagle Road in Heart Butte, Montana. The project site encompassed approximately 4.6 acres (**Figures 1 and 2**). All buildings on the HBGS property were once used for residential and commercial purposes; however, over time several of the buildings have been vacated and are no longer in use.

The Blackfeet Environmental Office (BEO) utilized a Cleanup Grant from EPA to complete abatement work prior to renovation or demolition of the five buildings included in this project. The five buildings that were part of this project include the Round Hall, the Fire Garage, the Comes at Night House, the Rutherford House, and the Community Center, also be referred to as the Senior Center (**Figures 3 through 7**).

NewFields oversaw the abatement activities over the course of the project and stayed in close contact with both ACM and BEO personnel throughout the project. The project began on August 31, 2020 and was completed by September 10, 2020. A list of services completed by NewFields for this project are listed below.

## **SCOPE OF NEWFIELDS SERVICES**

Components for project completion:

- Preparation of a Sampling and Analysis Plan (SAP) and Site-Specific Health and Safety Plan (HASP) (NewFields, 2020a);



- Preparation of a Cleanup Plan for Asbestos and LBP Abatement (NewFields, 2020b);
- Completing the Analysis of Brownfields Cleanup Alternatives (ABCA) and attending meetings to assist BEO with technical questions during community outreach;
- Coordinating with project stakeholders, including regulatory agencies and historical preservationists;
- Coordinating and leading a pre-abatement logistical planning meeting;
- Performing abatement oversight, including asbestos visual and air clearance sampling and visual lead clearance sampling;
- Reviewing contractor certified payroll and payment applications requests, and other project management duties and
- Preparing this Completion Report.

Copies of the SAP and Cleanup Plan are available upon request. Additional information concerning the components completed by NewFields is provided below.

## **ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES (ABCA)**

As described in the assessment and cleanup alternatives report prepared by NewFields (NewFields, 2018), three alternatives were considered for abatement of asbestos-containing building materials (ACBM) and lead-based paint (LBP) on the HBGS Project, including:

- Alternative 1: No Action.
- Alternative 2: Abatement of asbestos and/or lead-based paint, followed by demolition of all existing structures and redevelopment.
- Alternative 3: Abatement/renovation of three of the structures (Round Hall, Senior Center, and Comes at Night House) and abatement and demolition of two structures (Fire Garage and Rutherford House).

The alternatives were evaluated in the Brownfields Cleanup Alternatives (ABCA) based on regulatory compliance, effectiveness, implementability, and cost. Of the three cleanup alternatives evaluated, Alternative 3 was selected as the preferred alternative. The ABCA is included in **Attachment A**.

## **COMMUNITY OUTREACH**

A Community Outreach Plan (**Attachment B**) was prepared to outline the steps taken to involve stakeholders during the cleanup process. To solicit public comments on the remediation approach, a public meeting was held on August 11, 2020, during the annual powwow at the Heart Butte Society Celebration. The public meeting was advertised and the BEO set up a table outside of the Heart Butte School, where NewFields answered technical questions about the project. Attendees included two members of the Blackfeet Tribal Business Council.



## HISTORIC REGISTER DETERMINATION

BEO prepared and submitted a request for documentation of HBGS buildings with the Blackfeet Tribal Historic Preservation Office (THPO). Based on THPO’s review of the form, the THPO found no findings of Cultural Significance. Therefore, abatement work was completed without historical mitigation stipulations. The THPO letter is included as **Attachment C**.

## SELECTION OF ABATEMENT CONTRACTOR

Abatement Contractors of Montana (ACM) was selected to complete pre-renovation/demolition asbestos and LBP abatement for this project. As required for federally funded projects, NewFields verified that ACM was not listed as ineligible to work on federally funded projects on the Excluded Parties Listing System (EPLS), which later became the System for Award Management (SAM). ACM complied with applicable federal Davis-Bacon wage rate requirements as documented by certified payroll reports and employee interviews conducted by NewFields on behalf of BEO to verify compliance with prevailing wage rates. This documentation is not included in this report due to the sensitivity of personal information contained in payroll reports; however, documentation was submitted to BEO and is available upon request.

## ABATEMENT ACTIVITIES

A summary of the asbestos and LBP abated on this project is shown in **Table I** below. Additional details on the work completed for each structure is described in the following sections. A more detailed description of the asbestos and LBP abatement completed at each project is found in the Clearance Letter included as **Attachment D. Appendix D** also includes visual inspection forms, air sample collection forms, project photos, waste shipment records for asbestos disposal, and the lead TCLP analytical report for disposal.

**Table I. ACBM and Lead-Based Paint Abated on the Project**

Building	Asbestos Abated	LBP Abated	Asbestos/LBP Clearance Completed	Planned Use
Round Hall	None	Log ends and main entrance	None for asbestos, visual for LBP	Occupancy
Rutherford House	Sheetrock Ceiling and Walls, Mud Patch Materials	None	Visual for asbestos only	Demo
Comes at Night House	VSF and Moldy Subfloor	Log Ends and main entrance	Visual and Air Sampling for asbestos, visual for LBP	Occupancy
Fire Garage	Exterior Cement Asbestos Board Panels	None	Visual for asbestos only	Reuse
Community Center	VSF and Subfloor, Sheetrock (eastern half of building)	None	Visual and Air Sampling for asbestos only	Occupancy

### Asbestos Abatement

Abatement work was completed by ACM between August 31, 2020 and September 10, 2020. Project management and oversight services were completed by NewFields staff to ensure ACM personnel





completed the abatement/remediation work in accordance with EPA and DEQ regulations, and the Cleanup Plan for Asbestos and LBP Abatement (NewFields, 2020b).

### **Asbestos Clearance**

Upon completion of the asbestos abatement activities, NewFields staff completed final clearance air sampling in accordance with the Administrative Rules of Montana (ARM) 17.74.357 and the EPA approved Sampling and Analysis Plan (NewFields, 2020a). Based on the type of asbestos abated and the plans for occupancy and demolition of building, clearance air sampling was completed within the Community Center and Comes at Nights House, and clearance visual inspections were completed at the Fire Garage and the Rutherford House. Based on clearance visual inspections all work areas were deemed clean and free from residual dust and debris. Final clearance air sample results showed that the two occupied buildings were safe for renovations with air quality remaining below the EPA and ARM asbestos clearance standard of less than or equal to 0.01 fibers per cubic centimeter of air (0.01 f/cc).

Based on visual observations made over the course of the project and final clearance visual and air sampling services NewFields confirmed that the asbestos and LBP abatement work for the HBGS project was completed properly and the buildings were cleared for either re-occupancy or demolition.

### **Lead-Based Paint Removal**

The LBP abatement work was completed in accordance with EPA, OSHA, and the Cleanup Plan (NewFields, 2020b). The work consisted of abatement of LBP on the log ends and the main entrance of the Round Hall and select areas of the Comes at Night House. Loose and flaking paint was removed and the areas were re-painted. These areas should still be considered as containing LBP.

### **Lead Clearance**

Final visual clearance inspections were completed for the Round Hall and the Comes at Night House. NewFields completed a walkover of all areas with ACM personnel and confirmed that all paint chips were captured on plastic sheeting and that the paint chips were collected and scheduled for analysis in accordance with the Toxicity Characteristics Leaching Procedure (TCLP) for waste disposal.

## **DEVIATIONS FROM THE CLEANUP PLAN FOR ABATEMENT**

The scope of work deviated from the Cleanup Plan SAP (NewFields, 2020b), as follows:

- Vermiculite attic insulation in the Comes at Night House was originally scheduled to be abated but was omitted due to cost constraints by the BEO. In addition to the change in scope for vermiculite, the overall square footage of vinyl sheet flooring was reduced to include only the vinyl sheet flooring impacted by water intrusion. ACM, BEO and NewFields worked with Mr. Comes at Night to ensure the safe abatement and cleanup of his house. ACM applied a mold remediation treatment at Comes at Night building.
- At the Community Center sheetrock walls and ceilings containing less than one percent (<1%) asbestos in the west half/cafeteria area of the building were not abated as directed by BEO, as there was no plan to renovate the cafeteria.
- The Rutherford House LBP abatement was omitted from the abatement scope of work. Since this building was to be demolished, NewFields instead collected a bulk material composite




sample of the building and analyzed it for lead by the Toxicity Characteristics Leaching Procedure (TCLP) method to determine if the demolition waste would be a hazardous waste. The TCLP lead result showed the demolition waste could be disposed of as a non-hazardous waste (see **Appendix D**).

- The scope at the Round Hall increased a bit to include repair and painting of all log ends in addition to the front entrance, as directed by the BEO.

We appreciate the opportunity to work with the Blackfeet Environmental Office and tribal members to assist through the pre-renovation and demolition asbestos and LBP abatement portion of this project. We look forward more opportunities to work with and assist BEO, and the Blackfeet Tribe for future redevelopment.

Respectfully submitted,  
**NewFields**

  
Ryan McGee  
Sr. Environmental Scientist

  
Chris Cerquone  
Principal Scientist

Figures:

Figure 1 - Location Map  
Figure 2 - Site Map  
Figures 3 - 7 Abatement Figures

Attachments:

Attachment A Analysis of Brownfields Cleanup Alternatives  
Attachment B Community Relations Plan  
Attachment C THPO Letter  
Attachment D Final Clearance Letter for Asbestos and Lead-Based Paint Abatement

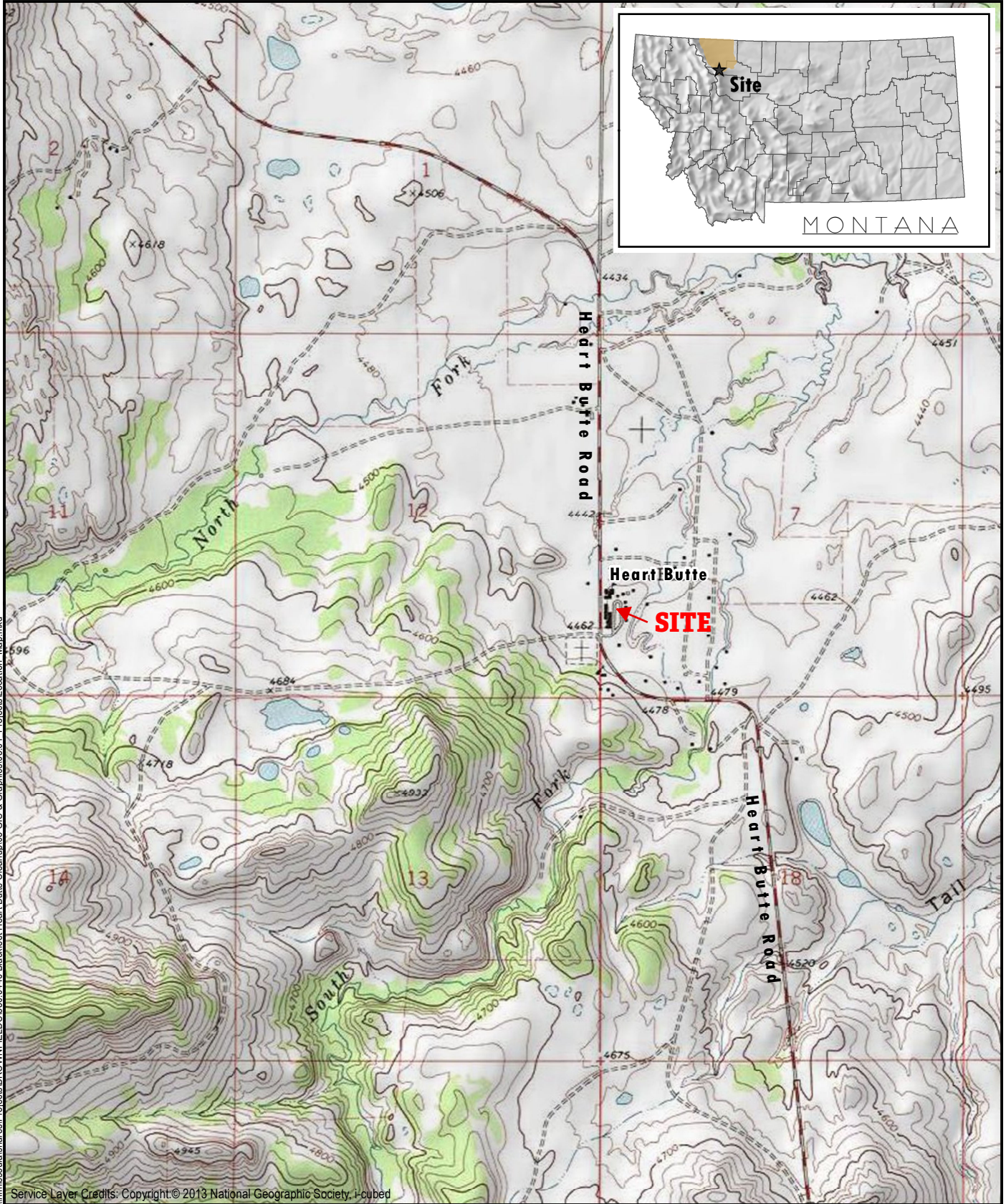
Electronic copy:

Ms. Barbara Benoy, U.S. Environmental Protection Agency, Region 8



FIGURES





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Service Layer Credits: Copyright © 2013 National Geographic Society, i-cubed



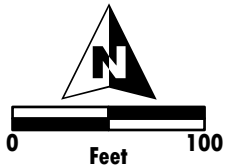
Location Map  
 Government Square  
 Heart Butte, Montana  
 FIGURE 1

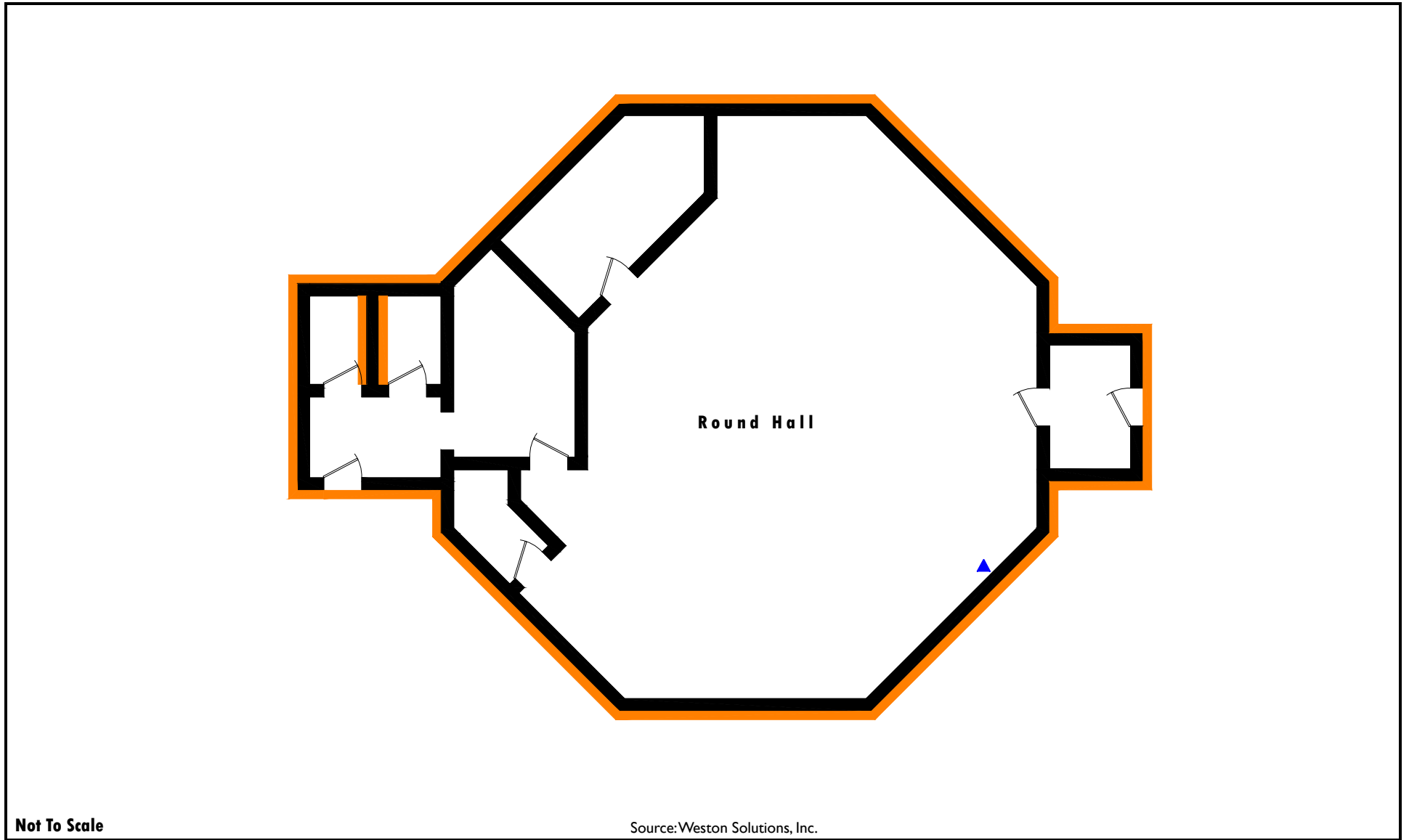


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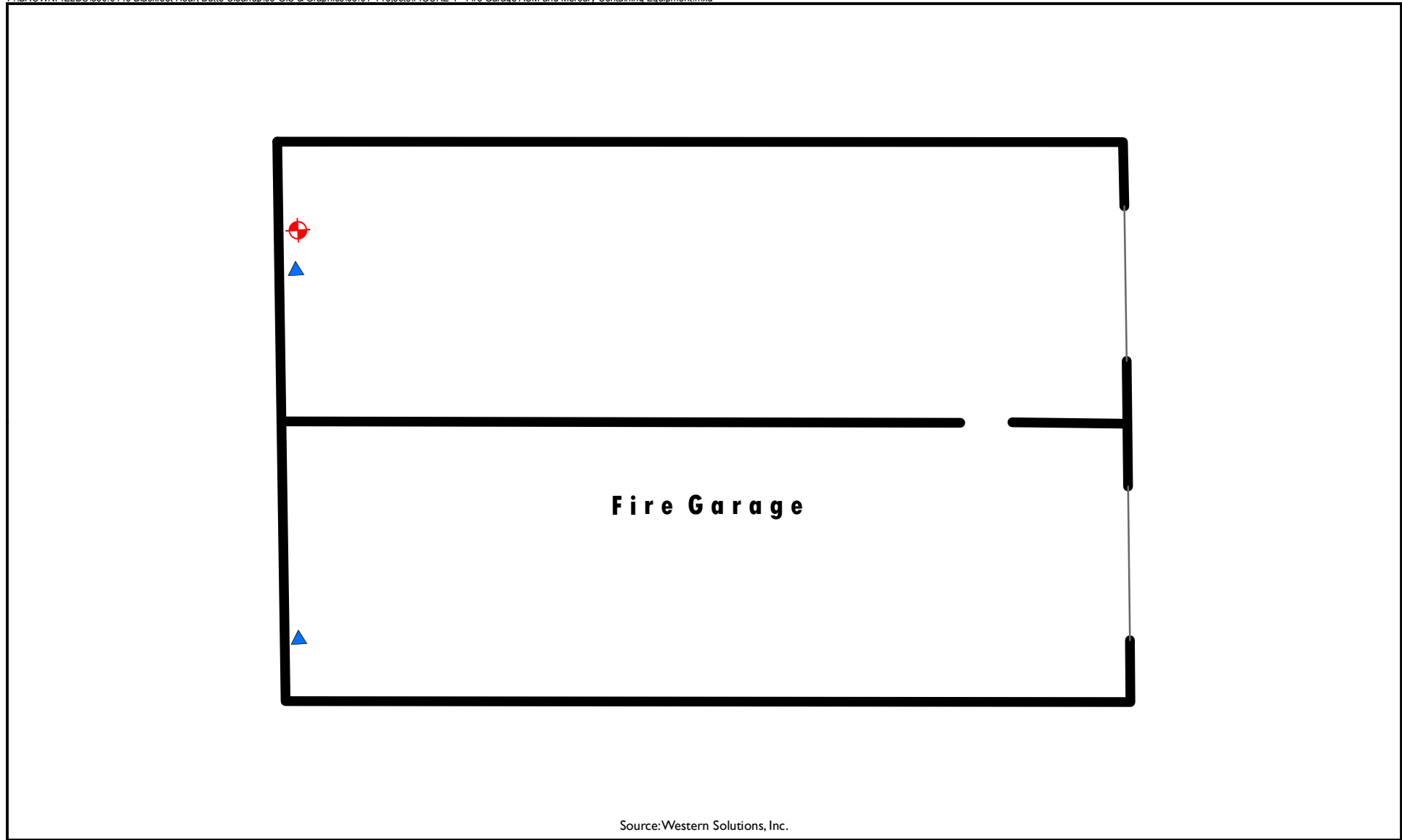
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



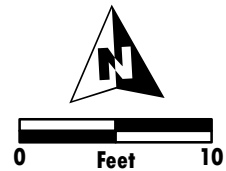


- Lead Based Paint Extent
- ▲ Mercury Thermostat Switch

Round Hall - Lead Based Paint  
Hazardous Building Materials Survey  
Government Square  
Heart Butte, Montana  
FIGURE 3



Source: Western Solutions, Inc.

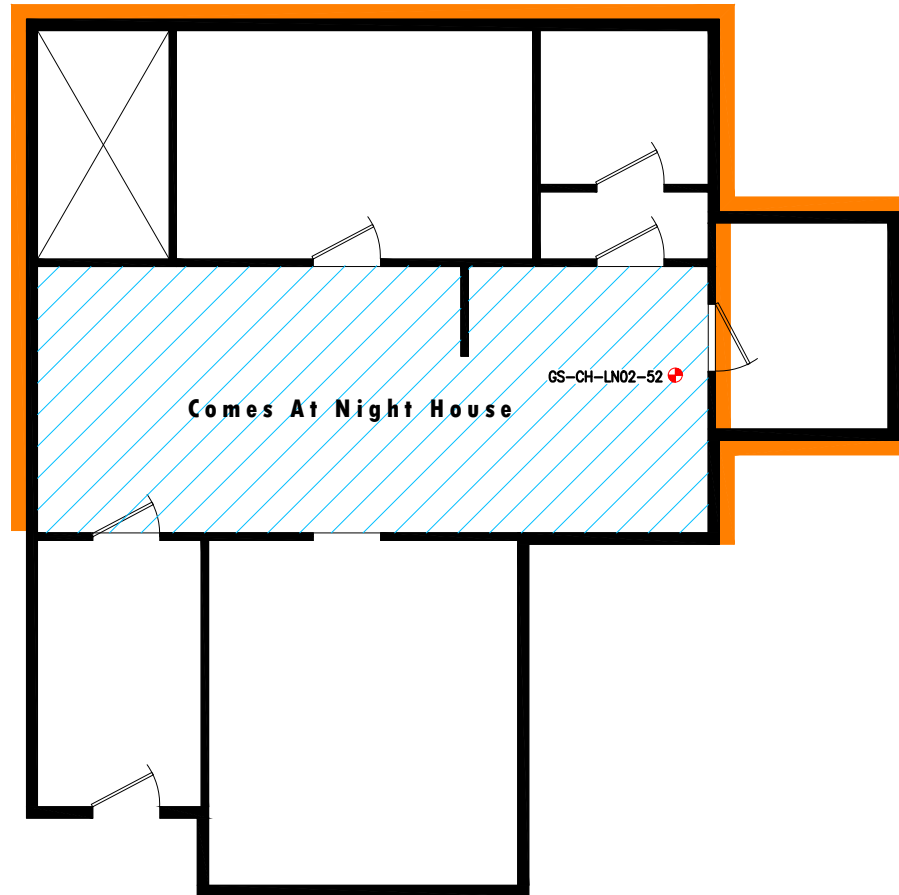


- ▲ Mercury Thermostat Switch
- ⊕ AMC Sample Location (Approximate)
- Garage Door
- Walls

**Fire Garage ACM and Mercury Containing Equipment  
Hazardous Building Materials Survey  
Government Square  
Heart Butte, Montana  
FIGURE 4**

GS-CH-S02 (301 mg/Kg)

GS-CH-S01 (287 mg/Kg)



Comes At Night House

GS-CH-LN02-52

Not To Scale

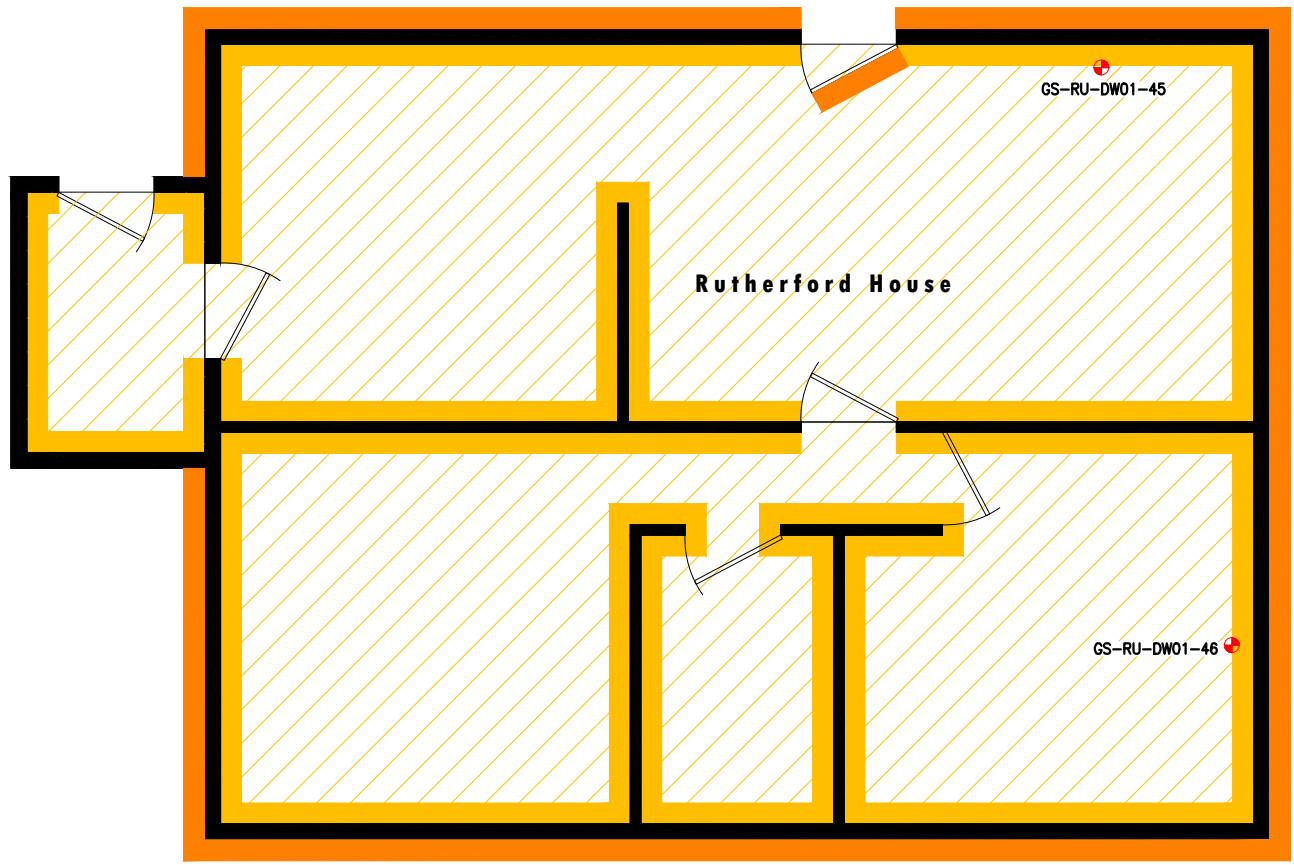
Source: Weston Solutions, Inc.

- Lead Based Paint Extent
- No Access
- ACM Linoleum Extent

- ACM Asbestos Containing Material
- LBP Lead Based Paint
- ACM Sample Location (Approximate)
- Lead in Soil Sample Location (Approximate)






Comes At Night House - ACM and LBP Inventory  
Hazardous Building Materials Survey  
Government Square  
Heart Butte, Montana  
FIGURE 5



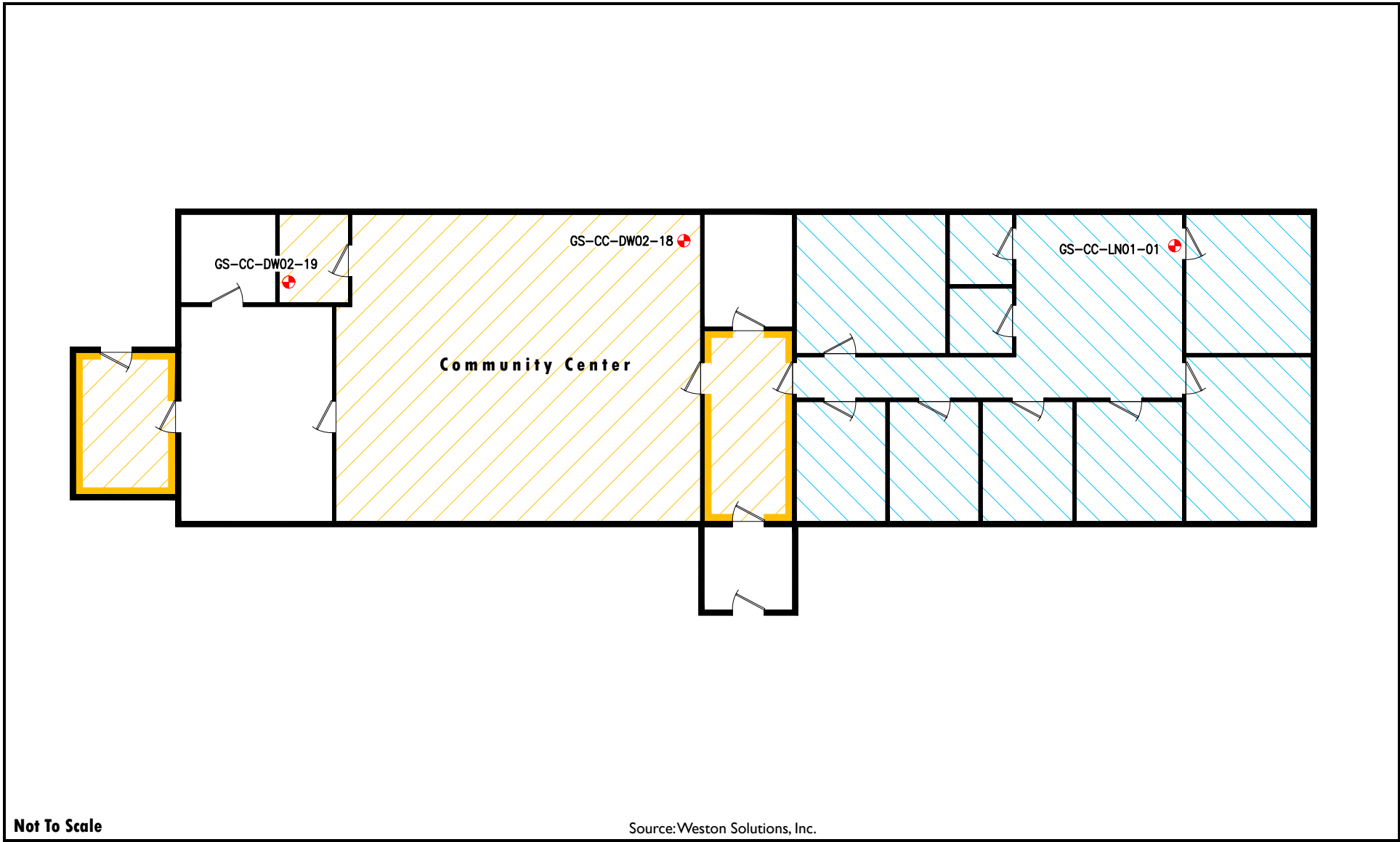


Not To Scale

Source: Weston Solutions, Inc.

- |                                                                                     |                              |                                                                                       |                                   |
|-------------------------------------------------------------------------------------|------------------------------|---------------------------------------------------------------------------------------|-----------------------------------|
|  | Lead Based Paint Trim Extent |  | ACM Asbestos Containing Material  |
|  | ACM Drywall Compound Extent  |  | LBP Lead Based Paint              |
|  | ACM Drywall Compound Extent  |                                                                                       | ACM Sample Location (Approximate) |

Rutherford House - ACM and LBP Inventory  
 Hazardous Building Materials Survey  
 Government Square  
 Heart Butte, Montana  
 FIGURE 6



- ACM Drywall Compound Extent
- ACM Drywall Compound Extent
- ACM Linoleum Extent
- ACM Asbestos Containing Material
- +
 ACM Sample Location (Approximate)

**Community Center - ACM Inventory**  
**Hazardous Building Materials Survey**  
 Government Square  
 Heart Butte, Montana  
**FIGURE 7**



# Analysis of Brownfields Cleanup Alternatives



ATTACHMENT A

FINAL Analysis of Brownfield Cleanup Alternatives (ABCA)  
Heart Butte Government Square Site  
Blackfeet Indian Reservation  
Pondera County, Montana

## **Introduction and Background**

A draft Analysis of Brownfields Cleanup Alternatives (ABCA) was prepared by the Blackfeet Environmental Office (BEO) in anticipation of the BEO's application for a U.S. EPA Brownfields cleanup grant for the Government Square site. This final ABCA was developed following community input on the project. The Government Square site is located in Heart Butte, Montana, a community of approximately 570 inhabitants located 26 miles south of Browning. Heart Butte, one of the oldest traditional communities on the Reservation, is the former location of an Indian agency.

The Government Square site lies on the east side of Heart Butte Road near the intersection of Spotted Eagle Road between the north and south forks of White Tail Creek. Residential land uses predominate to the south and east of the site, while the Heart Butte Health Station lies to the north of the site. Buildings on the Government Square property were constructed on a larger parcel that is owned by the U.S. Government in Trust for the Blackfeet Tribe. Contaminants of concern within the onsite structures include asbestos, lead-based paint, and mold.

Tribal member residents, who make up 99% of the population, suffer from a poverty rate of more than 50%, high unemployment, and a very low median household income. When compared to the Blackfeet Reservation as a whole, rates of poverty and unemployment are higher in Heart Butte, and the median income is lower. Although no information on rates of disease in Heart Butte are available, incidence rates for cancer are higher on the Blackfeet Reservation than for Montana as a whole. The Government Square site, when cleaned up and redeveloped, will serve as a catalyst for improvements in residents' health, incomes, and standards of living, while also providing economic opportunities that will benefit tribal members.

The site consists of five buildings situated around the Government Square loop (see table below). All of the buildings are located within an area of approximately 500 feet by 350 feet. Because of their close proximity and the all-encompassing redevelopment vision for the area, the structures were collectively determined to be a single site for the purposes of the cleanup grant application. The Senior Center is used for occasional meetings and gatherings of Heart Butte residents. The Comes At Night residence is occupied. All other structures are unused and abandoned. The existing buildings were historically used as a community center, residences, a fire garage, and a tribal Round Hall, all of which were constructed before 1979. Debris from previous buildings at the site remain.

Based on available information, no Phase I ESAs have been completed at the Government Square site. In July 2017, Weston Solutions, Inc. (a contractor to the U.S. EPA) completed a Phase II Environmental Site Assessment (ESA) of the property. The ESA included 1) collection of building materials samples, 2) surface soil sampling adjacent to the buildings for lead, 3) surface soil sampling of open space areas within the interior of the Government Square loop, 4) inspections of light fixture ballasts for the presence of PCBs, 5) evaluations of mercury-containing thermostats, and 6) mold inspections. Based on the ESA results, contaminants at the above structures include asbestos-containing building materials (ACBMs), lead-based



paint (LBP), mold, and mercury in thermostat switches. Soil samples did not indicate the presence of any contaminants above regional screening levels. No PCB-containing ballasts were identified. Potential human exposure pathways include inhalation of asbestos fibers and lead-based paint, ingestion of lead-based paint, inhalation of mold spores, and inhalation of mercury vapors from broken switches. The structures, associated contaminants, and redevelopment plans are listed in the table below.

<b>Structure</b>	<b>Contaminants</b>	<b>Extent</b>	<b>Redevelopment Plan</b>
Round Hall	LBP and mold	Entire exterior (LBP)	Reuse of building
Senior Center	ACBMs	Linoleum (east half) Drywall (west half)	Renovated structure
Comes at Night House	ACBMs, LBP, and mold	Linoleum (ACBMs; one room) Northern exterior (LBP);	Residence
Rutherford House	ACBMs and LBP	Drywall (ACBMs; entire structure) Entire exterior (LBP)	Residence or Business
Fire Garage	Mold	Various locations	Open Space

LBP=Lead based paint; ACBM=Asbestos Containing Building Materials

### Cleanup Alternatives

Three cleanup alternatives were considered for the Heart Butte Government Square. Under the first alternative, “no action,” the site would not be cleaned up, the structures would remain dilapidated and underutilized, the Government Square area would remain blighted, a risk to human health, and no new community assets would be created. The Blackfeet Tribe has the ability to implement this alternative, because no activities would be carried out. Although there would be no cost directly associated with implementation of the “no action” alternative, community benefits would not be realized and the area would remain dormant. This alternative is therefore not considered reasonable or effective because the redevelopment vision and goals for the site could not come to fruition.

The second alternative would result in the demolition of all existing structures followed by redevelopment. Abatement of asbestos and/or lead may be required prior to demolition. The sites of the former structures would then be available for redevelopment. This plan is not reasonable nor effective because it 1) does not allow for continued use of occupied structures without the need for substantial capital investment; and 2) would preclude the possibility of renovating and reusing existing buildings. The total cost to implement this alternative (estimated at \$350,000) would be higher than the third alternative (below), and insufficient funds are available to rebuild existing structures. The Blackfeet Tribe may not be able to implement this plan in its entirety due to high total costs that would include redevelopment rather than renovation of onsite structures.

The third alternative would involve abatement/renovation of three of the structures (Round Hall, Senior Center, and Comes At Night House) and demolition of two structures (Fire Garage and Rutherford House). The Blackfeet Tribe believes that the Round Hall and Senior Center buildings serve an important purpose in Heart Butte, and insufficient resources are available to fund their replacement.

This plan is reasonable and effective because it 1) allows for continued use of occupied structures without the need for substantial capital investment (Senior Center and Comes At Night House); 2) will lead to renovation and reuse of the historic Round Hall for the benefit of the community 3) will create open space

that can be used as park land (Fire Garage) and 4) will allow for a new business (Rutherford House). The total cost to implement this alternative is higher than the first (no-action) alternative but lower than the second (demolition) alternative. Based on the revised cost estimate provided in the cleanup plan, the Blackfeet Tribe will be able to implement this plan in its entirety using EPA grant funds. This cleanup alternative will reduce the volume of material transported to a landfill compared with the second alternative.

### Proposed Cleanup (Recommended Alternative) and Revitalization Plan

The preferred alternative is the third option discussed above: abatement/renovation of three of the structures (Round Hall, Senior Center, and Comes At Night House) and demolition of two structures (Rutherford House and Fire Garage). The BEO will assume oversight responsibility for the site during cleanup. Activities already completed in anticipation of site cleanup include: administrative and programmatic oversight; procurement of a technical consultant and building materials abatement contractor; evaluation of the 2017 Phase II ESA Report of Findings; preparation of a Quality Assurance Project Plan (QAPP); preparation of a Cleanup Planning Sampling and Analysis Plan (SAP); preparation of a Community Outreach Plan and a pre-cleanup fact sheet; a detailed site inspection; and limited supplemental asbestos sampling. The remaining tasks include abatement of ACBMs and LBP surfaces using industry standard methods; transportation to and disposal of wastes at an approved and licensed facility; and preparation of a final cleanup report. A final Cleanup Report will be prepared following abatement.

This cleanup plan aligns well with the redevelopment vision advanced by community members. Elements of the revitalization strategy include open land or park space, a grocery/convenience store, a fueling station, a revitalized senior citizens center, and a meeting space (Round Hall). New businesses and other site uses such as the senior citizens center will be able to take advantage of existing water and sewer systems already in place in central Heart Butte. The site is located near Heart Butte Road, the principal thoroughfare connecting the community to the larger community of Browning.

### **Climate Change and Severe Weather Events**

The EPA requires a discussion of whether climate change could impact the cleanup alternatives proposed above. According to the NOAA National Centers for Environmental Information, climate changes predicted for Montana include:

- Continued increases in mean annual air temperatures;
- Increased soil moisture loss during dry periods;
- Increased intensity of droughts;
- Fewer very cold days in the winter;
- Increased springtime precipitation could result in severe flooding; and
- Increased frequency of wildfire occurrence and severity.

The proposed cleanup project would not be impacted to a significant degree by any of the climatic changes described above in ways that would differ from impacts sustained were the “no action” alternative to be implemented. Under all alternatives, residential and commercial structures are the only targets for cleanup, and the plan does not involve any subsurface remediation that would be impacted by increased flooding.

## Cleanup Standards

This section summarizes standards for cleanup of asbestos and lead-based paint.

- RCRA Toxicity Characteristic Leaching Procedure (TCLP) limits
- HUD total lead concentration of 0.5% by weight or 5,000 milligrams per kilogram (mg/kg) (not risk based; identifies a lead-based paint)
- EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) for Asbestos (1% by weight) in 40 CFR 61.140-157
- Standards for airborne concentrations of mold, or mold spores, have not been set. Currently, there are no EPA regulations or standards for airborne mold contaminants.

## Applicable Laws

This section summarizes laws & regulations that would be applicable to the proposed cleanup.

### Lead

Applicable codes, regulations, and laws that govern lead remediation/cleanup work and transport/disposal of lead-contaminated wastes include the following:

1. Code of Federal Regulations (CFR) Publications:
  - a. OSHA 29 CFR 1926.62 Construction Industry Standard (1994)
  - b. OSHA 29 CFR 1926.500 Guardrails, Handrails, and Covers
  - c. OSHA 29 CFR 1910.134 Respiratory Protection
  - d. OSHA 29 CFR 1910.145 Specifications for Accident Prevention Signs and Tags
  - e. OSHA 29 CFR 1917.152 Hot Work
  - f. EPA 40 CFR 61 Subpart A, General Provisions
    - i. 40 CFR 61 Subpart M NESHAP
    - ii. 40 CFR 260-269 RCRA, Subtitle C
2. American National Standard Institute (ANSI) Publications:
  - a. Z88.2-1980 Practices for Respiratory Protection National Institute for Occupational Safety and Health (NIOSH)

### Asbestos

Applicable codes, regulations, and laws that govern lead remediation/cleanup work and transport/disposal of lead-contaminated wastes include the following:

1. Code of Federal Regulations (CFR) Publications:
  - a. OSHA 29 CFR 1926.1101 Construction Industry Standard (1994)
  - b. OSHA 29 CFR 1926.500 Guardrails, Handrails, and Covers
  - c. OSHA 29 CFR 1910.134 Respiratory Protection
  - d. OSHA 29 CFR 1910.145 Specifications for Accident Prevention Signs and Tags
  - e. EPA 40 CFR 61 Subpart A General Provisions
  - f. EPA 40 CFR 61 Subpart M National Emission Standard for Hazardous Air Pollutants
  - g. EPA 40 CFR 763.120, 121 Asbestos Abatement Projects
  - h. EPA 40 CFR 763 Subpart E AHERA, Asbestos-containing Materials in Schools
2. American National Standard Institute (ANSI) Publications:

- i. Z9.2-1979 Fundamentals Governing the Design and Operations of Local Exhaust Systems
  - j. Z88.2-1980 Practices for Respiratory Protection National Institute for Occupational Safety and Health (NIOSH) Revised Recommended Asbestos Standard
- 3. Environmental Protection Agency (EPA):
  - k. 560/5-85-024 Guidance for Controlling Friable Asbestos-Containing Materials in Buildings
- 4. State Requirements:
  - l. Chapter 74 Administrative Rules of Montana
  - m. Applicable sections of the Asbestos Work Practices and Procedures Manual, (2005)





# Community Relations Plan



ATTACHMENT B

**Community Outreach Plan  
US EPA Brownfields Cleanup Grant  
Heart Butte Government Square  
Blackfeet Environmental Office  
June 4, 2019**

**1.0 OVERVIEW**

In 2018, the Blackfeet Tribe was awarded a \$200,000 EPA Brownfields Cleanup Grant by the U.S. Environmental Protection Agency (EPA) to abate hazardous substances associated with structures at the Heart Butte Government Square site in Heart Butte, Montana. The Blackfeet Environmental Office (BEO) prepared this Community Outreach Plan (COP) in accordance with the Cooperative Agreement between the Blackfeet Tribe and EPA. The COP outlines the strategies that will be used to effectively communicate with the public and stakeholders and involve local residents, interested members of the public, surrounding property owners, businesses, government agencies, and local organizations in the cleanup process.

**2.0 COORDINATOR AND INFORMATION REPOSITORY**

The coordinator for this project is Mr. Shawn Lahr, Blackfeet Tribe Brownfields Coordinator, who may be contacted at:

Blackfeet Environmental Office  
Environmental Protection Department  
P.O. Box 2029  
Browning, MT 59417  
(406) 338 7421  
slahr@3rivers.net

An administrative record for the project is located at the BEO office in Browning and can be viewed by appointment by contacting Shawn Lahr.

**3.0 GOVERNMENT SQUARE SITE DESCRIPTION**

The site consists of 5 buildings situated around the Government Square loop. All of the buildings are located within an area of approximately 500 feet by 350 feet. Because of their close proximity and the all-encompassing redevelopment vision for the area, the structures were collectively determined to be a single site for the purposes of cleanup. The existing buildings were historically used as a community center, residences, a fire garage, and a tribal Round Hall, all of which were constructed before 1979. Debris from previous buildings at the site (a clinic and a school) remain; however those buildings are no longer present. Contaminants at the above structures include asbestos-containing building materials (ACBMs), lead-based paint (LBP), and mold. Potential human exposure pathways include inhalation of asbestos fibers, lead-based paint, and mold spores as well as ingestion of lead-based paint.

## **4.0 COMMUNITY INVOLVEMENT PLAN**

The BEO has facilitated community involvement related to its Brownfields program for a number of years, and part of its web site is dedicated to local Brownfields assessments and cleanups. With regard to the Heart Butte site, the Tribe advertised and facilitated a public meeting at the Heart Butte Senior Center prior to submittal of the grant application in order to discuss the grant proposal and solicit public comment.

Ongoing community involvement will be critical to the success of our brownfields program. The following are the key components of our plan.

- Maintain and enhance our existing brownfields website.
- Develop an educational PowerPoint presentation after cleanup is complete.
- Develop a pre-cleanup and a post-cleanup fact sheet for the site.
- Plan a pre-cleanup and a post-cleanup public meeting. The first meeting is tentatively scheduled for August 11, 2019 during the Heart Butte Society Celebration.
- Engage local media outlets such as the Glacier Reporter while abatement is occurring to advertise the project success.
- Place an informational article in the Blackfeet Tribe newsletter.
- Prepare a Community Outreach Report at the end of the grant period to summarize outreach completed throughout the project. Meeting notes, attendance lists, and meeting advertisements would be appended to the report.

## **5.5 Collaborating Agencies and Organizations**

The BEO will work with the following agencies and organizations on this project:

- The Blackfeet Land Department: The Department will provide any necessary permits to complete the cleanup project.
- Tribal Employment Rights Office (TERO): The office will monitor and document implementation of Indian Preference policies.
- The Tribal Historic Preservation Office (TPHO): This agency has reviewed the proposed cleanup activities and issued a determination that there were no findings of cultural significance for the site. Therefore, the proposed assessment and cleanup actions will not impact cultural, historic, or archaeological resources.
- Planning and Economic Development Office: The BEO will communicate with the planning office as the cleanup project is carried out to understand redevelopment plans for the site.
- Blackfeet Department of Commerce: Contractors working on the project have received a Blackfeet Tribal Business License from the Department.
- U.S. EPA: The BEO will communicate regularly with Ms. Barbara Benoy, the U.S. EPA project officer for the site.
- We will collaborate with Blackfeet Community College in an attempt to provide an opportunity for students to learn about asbestos abatement work.
- The BEO will also maintain close contact with the Heart Butte Senior Center staff and members to keep them informed of progress on the project.





## THPO Letter



ATTACHMENT C



# Memo

**To:** John Murry, THPO Director

**From:** Gerald Wagner, BEO Director

*G. Wagner*

**Cc:** Shawn Lahr, Brownfields Manager

**Date:** 2/12/2019

**Re:** Request for documentation for Heart Butte Government Square; Findings of no effect on tribal cultural properties

---

The Blackfeet Tribe received a Brownfields Clean up Grant to clean up the Heart Butte Government square site which includes the following structures: HB Senior Center, Round Hall, Jesse Rutherford House, Clarence comes At Night House, Fire/Bus Garage. These structures will be abated of contaminated materials and the Rutherford house will be demolished.

The Blackfeet Environmental Office is requesting documentation from Blackfeet THPO to move forward with the cleanup activities at this site. Please coordinate with Shawn Lahr on our request, Thank you

**Blackfeet Tribal Historic Preservation Office  
Cultural Resources Survey  
Blackfeet Indian Reservation**

**For**

**Heart Butte Government Square Site**

**Brownfields Clean Up Grant**

**T29N- R9W- Section 7**

**By**

**Virgil Edwards, Deputy THPO  
Blackfeet Tribe  
P.O. Box 850  
Browning, Montana 59417**

**February 12, 2019**

## **Blackfeet Cultural Resources Survey**

Project Title: Heart Butte Government Square-Brownfields Clean Up Grant Project

Date of Determination: 2/12/2019

Form Completed by: Virgil Edwards, Deputy THPO

Location Method: N/A

Agency: Blackfeet Tribe

Physical Site Description: Heart Butte Senior Center, Round Hall, Jesse Rutherford House, Clarence Comes at Night House & Fire/Bus Garage

### **Description of Undertaking / Project**

Project Description: This project will include abatement of contaminated material and the Rutherford House will be demolished.

Nature of anticipated disturbance: N/A

### **Findings**

The Blackfeet THPO has determined that the abatement process and demolishing will result in:

**No Findings of Cultural Significance**

*Virgil Edwards*





# Final Clearance Letter for Asbestos and Lead-Based Paint Abatement



ATTACHMENT D



February 1, 2021

Mr. Shawn Lahr  
Brownfields Coordinator  
Blackfeet Environmental Office  
Blackfeet Tribe Brownfields Program

**Project: Final Clearance Letter  
Pre-Renovation and Demolition Asbestos and Lead-Based Paint Abatement  
Heart Butte Government Square, Government Square Loop  
Heart Butte, Pondera County, Montana**

Dear Mr. Lahr:

NewFields is pleased to provide this Final Clearance Letter as documentation of the completion of the Heart Butte Government Square, Government Square Loop (HBGS), Pre-Renovation and Demolition Asbestos Abatement and Lead-Based Paint Abatement Project in Heart Butte, Montana.

## **PROJECT SUMMARY**

The Blackfeet Environmental Office (BEO) contracted NewFields to assist in preparing asbestos and lead-based paint (LBP) abatement documents, developing a cleanup plan (abatement scope-of-work), assisting with contractor selection and contract award, performing abatement oversight, and providing project management services on behalf of the BEO. As part of the abatement oversight, NewFields performed final clearance visual inspections (asbestos and lead) and final clearance air sampling (asbestos) services following abatement activities in structures to be re-occupied.

Asbestos and LBP abatement work was completed by Abatement Contractors of Montana (ACM) of Missoula, Montana. Project activities were managed by Mr. Ruben Navarro, project supervisor for ACM. Mr. Ryan McGee, NewFields' Montana-accredited asbestos abatement Contractor/Supervisor (MTA-1705-IN-CS) and EPA accredited Lead Inspector/Risk Assessor (LBP-R-1198901-1) performed project management, oversight, and air clearance sampling throughout the project. Copies of Mr. McGee's asbestos and LBP accreditations are provided in **Appendix A**.

## **ASBESTOS ABATEMENT**

Asbestos abatement activities commenced on August 31, 2020 with a pre-abatement planning meeting held on-site at HBGS. ACM, BEO and NewFields personnel met and discussed the anticipated schedule and confirmed that asbestos abatement would be completed at the Fire Garage, Community Center, Comes at Night House, and Rutherford House would be completed. Abatement of the Rutherford House and Fire Garage would be completed in the first week followed by abatement of the Community Center and Comes at Night House the second week. Scheduling abatement of the two occupied buildings during the second week allowed the owners time to prepare for the abatement.



**Table I** below identifies the asbestos abated from the four buildings, the clearances completed, and which structures were to be reoccupied or demolished.

**Table I: ACBM Abated on the Project**

Building	Asbestos Abated	Asbestos Clearance Completed	Planned Use
Rutherford House	Sheetrock Ceiling and Walls (Non-RACM), Mud Patch Materials (RACM)	Visual, as building was being demolished.	Demolition
Comes at Night House	VSF and Moldy Subfloor	Visual and Air Sampling	Occupancy
Fire Garage	Exterior Cement Asbestos Board Panels	Visual, as material was on outside of building	Reused (not inhabited)
Community Center	VSF and Subfloor, Sheetrock (eastern half of building)	Visual and Air Sampling	Occupancy

ACM completed asbestos abatement activities in accordance with OSHA safe work practices using wet methods and vacuums equipped with high efficiency particulate air (HEPA) filtration. NewFields completed the required clearances (visual and/or air sampling) to document the asbestos materials were removed and buildings were safe for re-occupancy, as appropriate.

On September 2, 2020, Mr. McGee and Mr. Navarro completed an asbestos final clearance visual inspection for the Fire Garage exterior cement board abatement, and a pre-abatement walkthrough of the Rutherford House. During the walkthrough of the Rutherford House, Mr. McGee and Mr. Navarro determined that contrary to the findings in the previous inspection (Weston, 2017) only a small area of wall surfacing materials (sheetrock mud) contained >1% asbestos, and the remainder of the sheetrock contained <1% asbestos. Since the Rutherford House was to be demolished, this allowed the abatement crew to remove most of the sheetrock outside of full containment enclosures, saving the BEO considerable cost. The final clearance visual inspection for the Rutherford House was completed on September 10, 2020. Copies of the final clearance visual inspection forms for the Fire Garage and the Rutherford House are provided in **Appendix C**.

Final clearance air sampling for asbestos was also completed for the Comes at Night House and Community Center on September 10, 2020. Final clearance documents for the Comes at Night House are provided in **Appendix D**, and final clearance documents for the Community Center are provided in **Appendix E**.

To close-out the abatement, NewFields obtained waste shipment records from ACM. Waste shipment records showed that a total of 5.73 tons and additional 12 cubic yards of asbestos waste was removed from the four buildings for this project and disposed of at the Northern Montana Joint Refuse Disposal District in Conrad, Montana. Copies of the waste shipment records are provided in **Appendix F**.

### **LBP ABATEMENT**

LBP was abated on the Round Hall by re-painting the exterior windows, the log ends, and door framework on the main entrance. ACM also removed chipping and peeling LBP and repainted select



areas of exterior window trim, soffit, and fascia of the Comes at Night House. LBP abatement and repainting of the Rutherford House was omitted from the scope of work since this building is to be demolition. Instead, a sample representative of the entire house was collected and analyzed for total lead using the EPA Toxicity Characteristics Leaching Procedure (TCLP) method. A copy of the Lead TCLP Analysis is provided in **Appendix G**. Based on the TCLP result, the waste stream generated for the Rutherford House can be disposed of at a Class II landfill without concern for lead.

To abate the lead on both structures, ACM placed 6-mil plastic sheeting on the ground around the work areas and scraped and containerize the LBP paint chips. LBP waste (paint chips, gloves, suits, etc.) were containerized and sampled for total lead by the EPA TCLP method. A copy of the TCLP analytical report and the final clearance visual form is provided in **Appendix B**. Based on the TCLP result, ACM disposed of the LBP abatement waste at a Class II landfill.

Mr. McGee completed the final clearance visual inspections on September 10, 2020. Additional documentation of the asbestos and LBP abatement work completed for the HBGS project is depicted in project photos taken during the project in **Appendix H**.

## REFERENCES

**Weston, 2017.** Limited Due Diligence and Phase II Environmental Site Assessment for Blackfeet Tribal Properties, Government Square, Heart Butte, Pondera County, Montana. July.

If you should have questions or would like to discuss any information contained herein, please feel free to contact Ryan McGee at (406) 461-4037/[rmcgee@newfields.com](mailto:rmcgee@newfields.com) or Adam Johnson at (406) 546-1006/[ajohnson@newfields.com](mailto:ajohnson@newfields.com).

Sincerely,  
**NewFields**

Ryan D. McGee  
Sr. Environmental Scientist

- Appendix A – NewFields Staff Accreditations
- Appendix B – Round Hall Final Clearance Visual and Lead Waste Shipment Record
- Appendix C – Fire Hall and Rutherford House Final Clearance Visual
- Appendix D – Comes at Night House Final Clearance Air Sampling
- Appendix E – Community Center Final Clearance Air Sampling
- Appendix F – Waste Shipment Records
- Appendix G – Rutherford House Lead TCLP Analysis Summary
- Appendix H – Project Photo Log and Field Notes

**FINAL CLEARANCE LETTER**

**APPENDIX A**

**STAFF ACCREDITATIONS**





## CERTIFICATE OF COMPLETION

**RYAN D MCGEE**

104 E Broadway Street, Suite G1, Helena, MT 59601

successfully completed course training and satisfactorily passed the course examination meeting the accreditation requirements for the  
**Montana 4-Hour Asbestos Inspector Refresher Course**  
in accordance with Administrative Rules of Montana 17.74.362 and/or 17.74.363

**Certificate Number: ACM 03282019-11**

**Examination Date:** 03/28/2019

**Course Date:** 03/28/2019

**Expiration Date:** 03/28/2020

**Course Instructor:**

Brian Betts  
Abatement Contractors of Montana, LLC  
208 Commerce Street  
Missoula, MT 59808  
406-549-8489

**Instructor Signature:**

**Course Approving Agency:**

Asbestos Control Program  
Montana Department of Environmental Quality  
PO Box 200901  
Helena, MT 59620-0901

**RYAN D MCGEE**  
has met the requirements of Montana Administrative Rule 17.74.362 and/or 17.74.363 for accreditation in the following asbestos occupation(s) through the specified expiration date(s).

Asbestos Inspector  
Project Contractor/Supervisor



03/28/2020  
09/27/2020

MT DEQ Asbestos Control Program

# United States Environmental Protection Agency

This is to certify that



Ryan D McGee

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226 as:

Risk Assessor

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires March 21, 2022

LBP-R-1198901-1

Certification #

March 07, 2019

Issued On



A handwritten signature in black ink, appearing to read "Adrienne Priselac".

Adrienne Priselac, Manager, Toxics Office

Land Division

**FINAL CLEARANCE LETTER**

**APPENDIX B**

**ROUND HALL**

## FINAL CLEARANCE VISUAL INSPECTION

Project	Heart Butte Gov't Square	Project #	350.0446.000
Building	<del>Common</del> Round Hall	Date	9/10/20
Location	Southside / Offices + Storage Exterior		
Material(s) Removed	Vinyl Sheet Flooring + <del>steeptack</del> <small>Rem 2190</small>	MT Project Permit #	N/A

None

EPA NESHAP Notification

**Residual dust identified during visual inspection:**

	Yes*	No	N/A	Comments
Floors			✓	
Walls			✓	
Ledges			✓	
Roof Decking			✓	
Pipes			✓	
Hangars			✓	
Conduits			✓	
Cables			✓	
Light Fixtures			✓	
Ductwork			✓	
Equipment			✓	

\*See comments

Visual Inspection:  PASS     FAIL

**Remarks:** Conducted final visual of exterior painted/encapsulated leg ends. All leg ends/tips scraped and encapsulated.  
 ACM collected all paint chips and debris. These materials removed and disposed by ACM as hazardous waste.

Inspected by: Ryan D. McGee (Printed Name)      [Signature] (Signature)      MTA - 1705

Accompanied by: R. Nowak (Printed Name)      [Signature] (Signature)      MTA - 2542





**The Identification Specialists**

Analysis Report  
prepared for  
Abatement Contractors of Montana, LLC

**Report Date: 12/30/2020**

**Project Name: Heart Butte**

**Project #: 2020-14**

**SanAir ID#: 20069878**



1551 Oakbridge Dr. Suite B | Powhatan, Virginia 23139-8061  
888.895.1177 | 804.897.1177 | fax: 804.897.0070 | [IAQ@SanAir.com](mailto:IAQ@SanAir.com) | [SanAir.com](http://SanAir.com)



SanAir ID Number  
**20069878**  
FINAL REPORT  
12/30/2020 9:16:10 AM

**Name:** Abatement Contractors of Montana, LLC  
**Address:** PO Box 8747  
Missoula, MT 59807  
**Phone:** 406-549-8489

**Project Number:** 2020-14  
**P.O. Number:**  
**Project Name:** Heart Buttle  
**Collected Date:** 9/14/2020  
**Received Date:** 12/23/2020 8:00:00 AM

Dear Tanya Chemodurow,

We at SanAir would like to thank you for the work you recently submitted. The 1 sample(s) were received on Wednesday, December 23, 2020 via FedEx. The final report(s) is enclosed for the following sample(s): 1A.

These results only pertain to this job and should not be used in the interpretation of any other job. This report is only complete in its entirety. Refer to the listing below of the pages included in a complete final report.

Sincerely,

A handwritten signature in black ink that reads "Abisola Kasali".

Abisola Kasali  
Metals Laboratory Director  
SanAir Technologies Laboratory

Final Report Includes:  
- Cover Letter  
- Analysis on Test Family T  
- Disclaimers and Additional Information

Sample conditions:  
- 1 samples in Good condition.



SanAir ID Number  
**20069878**  
FINAL REPORT  
12/30/2020 9:16:10 AM

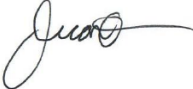
**Name:** Abatement Contractors of Montana, LLC  
**Address:** PO Box 8747  
Missoula, MT 59807  
**Phone:** 406-549-8489


**Project Number:** 2020-14  
**P.O. Number:**  
**Project Name:** Heart Buttle  
**Collected Date:** 9/14/2020  
**Received Date:** 12/23/2020 8:00:00 AM

Analyst: Ortega, David  
Test Method: EPA 1311/6010C

### TCLP Analysis

Sample	Description	Analyte	Results in mg/L	MRL (mg/L)
20069878 - 1	1A / Scrapped Paint And Wood, Suites, Gloves, And SR	Lead (Pb)	< 0.5	< 0.5

Signature:   
Date: 12/29/2020

Reviewed:   
Date: 12/29/2020

### **Disclaimer**

SanAir Technologies Laboratory, Inc. participates in the Environmental Lead Accreditation Program (ELAP) administered by AIHA-LAP, LLC (Lab ID162952). Refer to our accreditation certificate or [www.aihaaccreditedlabs.org](http://www.aihaaccreditedlabs.org) for an up to date list of the Fields of Testing for which we are accredited. SanAir also participates in the State of New York's DOH-ELAP (Lab Id 11983), and has met the EPA's NLLAP program standards. This report does not constitute endorsement by AIHA-LAP, LLC and/or any other U.S. governmental agencies; and may not be accredited by every local, state or federal regulatory agency.

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### **TCLP EPA Limits**

5.0 mg/L Silver (Ag)	100 mg/L Barium (Ba)	5.0 mg/L Chromium (Cr)	5.0 mg/L Lead (Pb)
5.0 mg/L Arsenic (As)	1.0 mg/L Cadmium (Cd)	0.2 mg/L Mercury (Hg)	1.0 mg/L Selenium (Se)





Technologies Laboratory  
 1551 Oakbridge Drive, Suite B - Powhatan, VA 23139  
 804-897-1177 / 888-895-1177 / Fax 804-897-0070  
 www.sanair.com

**Metals & Lead  
 Chain of Custody**

SanAir ID Number  
 20069878

Company: Abatement Contractors of Montana	Project #: 2020-014	Phone #: 406-549-8489
Address: P.O Box 8747	Project Name: Heart Butte	Phone #:
City, St., Zip: Missoula, MT 59807	Date Collected: 9/14/2020	Fax #: 406-728-9416
Samples Collected By:	P.O. Number:	Email: on file

**Matrix Types**

**Metals Analysis Types**

<input type="checkbox"/> Air	<input type="checkbox"/> Aqueous	<input checked="" type="checkbox"/> Bulk	<input type="checkbox"/> Total Concentration of Lead	<input type="checkbox"/> ICP-total concentration of metals (please list metals):
<input type="checkbox"/> Paint	<input type="checkbox"/> Sludge	<input type="checkbox"/> Soil	<input type="checkbox"/> Total Concentration of RCRA 8 Metals	
<input type="checkbox"/> Dust	<input type="checkbox"/> Wipe	<input type="checkbox"/> Potable Water	<input checked="" type="checkbox"/> TCLP for Lead	
<input type="checkbox"/> Non-Potable Water	<input type="checkbox"/> Wastewater		<input type="checkbox"/> TCLP for RCRA 8 Metals	<input type="checkbox"/> Other:
<input type="checkbox"/> Other:			<input type="checkbox"/> TCLP Full (w/ Organics)	

*Turn Around Times	Same Day <input type="checkbox"/>	1 Day <input type="checkbox"/>	2 days <input type="checkbox"/>	3 Days <input checked="" type="checkbox"/>
	<input type="checkbox"/> Standard (5 day)	<input type="checkbox"/> Full TCLP (10d)		

\*Courier charge for same day and 1 day TAT for offsite work.

Sample #	Sample Identification/Location	Flow Rate	Start Time	Stop Time	Volume (L) or Area (Sq ft)
1A	Scrapped paint and wood, suites, gloves, and SR				

Special Instructions	
----------------------	--

Relinquished by	Date	Time	Received by	Date	Time
CR	12/21/2020	12 pm	UM	12/23/20	08:00 am

Unless scheduled, the turn around time for all samples received after 3 pm will begin at 8 am the next business morning. Weekend or Holiday work must be scheduled ahead of time and is charged for rush turn around time. Work with standard turn around time sent Priority Overnight and Billed To Recipient will be charged a \$10 shipping fee.

**FINAL CLEARANCE LETTER**

**APPENDIX C**

**FIRE GARAGE AND RUTHERFORD HOUSE**

## FINAL CLEARANCE VISUAL INSPECTION

Project	Heart Butte Gov't Square	Project #	350.0446.000
Building	Fire Garage	Date	9/2/20
Location	Interior Debris		
Material(s) Removed	Cement Asbestos Board	MT Project Permit #	N/A

*EPA NESHAP Notification*

Residual dust identified during visual inspection:

	Yes*	No	N/A	Comments
Floors		✓		<i>Debris (Non-ACM) remains throughout</i>
Walls		✓		
Ledges		✓		
Roof Decking		✓		
Pipes		✓		
Hangars		✓		
Conduits		✓		
Cables		✓		
Light Fixtures		✓		
Ductwork			✓	
Equipment			✓	
*See comments				

Visual Inspection:  PASS  FAIL

**Remarks:** *Conducted final clearance visual inspection of interior work area. No containment required for clean-up. All cement asbestos board debris cleaned up and re-moved from the fire garage. Mold & bio-hazards remain in work area work area passed final clearance visual for asbestos. work completed per contract.*

Inspected by: Ryan D. McGee *Ryan D. McGee* MTA - 1705  
 (Printed Name) (Signature)

Accompanied by: R. Navorn *[Signature]* MTA - MT 2542  
 (Printed Name) (Signature)



## FINAL CLEARANCE VISUAL INSPECTION

Project	Heart Butte Gov't Square	Project #	350.0446.000
Building	Rutherford House	Date	9/10/20
Location	Interior		
Material(s) Removed	ACM sheetrock / Surfacing Joint Compound	MT Project Permit #	N/A

*EPA NESHAP Notification*

**Residual dust identified during visual inspection:**

	Yes*	No	N/A	Comments
Floors		✓		
Walls		✓		
Ledges		✓		
Roof Decking		✓		
Pipes		✓		
Hangars		✓		
Conduits		✓		
Cables		✓		
Light Fixtures			✓	
Ductwork			✓	
Equipment				
*See comments				

Visual Inspection:  **PASS**     **FAIL**

**Remarks:** *Conducted final clearance visual inspection of the Rutherford House w/ ACM. All sheetrock / Surfacing (Joint Compound 2%) removed. Work areas for walls and ceiling appeared clean and free from residual dust & debris. Work area passed pre-demolition building inspection*

Inspected by: Ryan D. McGehee *Ryan D. McGehee* MTA - 1705  
(Printed Name) (Signature)

Accompanied by: R. Nasom *[Signature]* MTA - 2542  
(Printed Name) (Signature)



**FINAL CLEARANCE LETTER**

**APPENDIX D**

**COMES AT NIGHT**

## FINAL CLEARANCE VISUAL INSPECTION

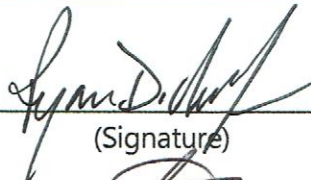
Project	Heart Butte Gov't Square	Project #	350.0446.000
Building	Clearance Comes at Night Residence	Date	9/10/20
Location	Kitchen/Dining Rm		
Material(s) Removed	Vinyl Sheet Flooring + Subfloor	MT Project Permit # N/A	


**Residual dust identified during visual inspection:**

	Yes*	No	N/A	Comments
Floors		✓		
Walls		✓		
Ledges		✓		
Roof Decking			✓	
Pipes		✓		
Hangars		✓		
Conduits		✓		
Cables		✓		
Light Fixtures		✓		
Ductwork			✓	
Equipment		✓		
*See comments				

Visual Inspection:  PASS  FAIL

**Remarks:** Completed final clearance visual inspection of interior flooring removal area in Kitchen + Dining Room areas ~360 SF. No residual dust or debris. Bad mold problem, failing floor, but all asbestos removed per contract. Prepared work area for final clearance air sampling for asbestos.

Inspected by: Ryan D. McGee  MTA - 1705  
 (Printed Name) (Signature)

Accompanied by: TC Navarro  MTA - 2542  
 (Printed Name) (Signature)



# AIR SAMPLE COLLECTION FORM

Project: Heart Butte Gov't Square	Date: 9/10/20
Building: Clarence Comes At Night Residence	Calibration Instrument: DynCal
Location: Kitchen/Dining Room	Personnel: R. M. Gce
Project No.: 350.0446.600	Permit Number: N/A - NESHAP Notification to EPA

Sample ID	Pump ID	Sample Description/Location	Pre-calibration Flow Rate/Time	Start Time	Post-Calibration Flow Rate/Time	Stop Time	Total Time	Avg. Flow	Volume (liters)	Results (f/cc)
CC-01	14	Final Clearance - Inside Deion	10.653 8:14	8:30	10.799 10:09	10:21	116	10.726	1,244.216	5/100 1.002
CC-02	Not 4	- NE Corner @ Storage Rm - SW Corner - Middle Containment - SE Corner	10.475 8:15		10.952 10:10			10.714	1,242.821	6/100 1.002
CC-03	Not 11		10.743 8:24		10.984 10:11			10.864	1,260.224	7.5/100 1.003
CC-04	13		10.739 8:26		10.982 10:11			10.861	1,259.876	5.5/100 1.002
CC-05	15		10.329 8:28		10.575 10:17			10.452	1,254.240	3.5/100 1.002
CC-06	N/A		Field Blank - open 30 seconds Inside		N/A					
CC-07		- open 30 seconds Outside								Hold
CC-08	↓	Lub Blank Lot# 20200302	↓							N/D

\*Notes: N/A = Not Applicable ~ All samples passed required clearance criteria. Notified  
 N/D - Non detected ACM that the containment could be removed. Conducted walk through with Mr. Comes at Night.

## FINAL CLEARANCE AIR SAMPLE RESULTS

<b>Project</b>	Heart Butte Government Square	<b>Project No.</b>	350.0446.000
<b>Building</b>	Clarence Comes at Night House	<b>Date</b>	9/10/2020
<b>Location(s)</b>	Kitchen/Dining Room Area		

<b>Types of Samples Collected:</b>	<b>X</b>	PCM		TEM
<b>Aggressive Sampling:</b>	<b>X</b>	YES		NO
<b>Number of Samples Collected:</b>	<b>5</b>			
<b>Number of Blanks Collected:</b>	<b>3</b>			

## AIR SAMPLE RESULTS

Sample No.	Location	PCM Concentration fibers per cubic centimeter (fibers/cc)	TEM Concentration	
			structures per square millimeter	structures per cubic centimeter
CC-01	Inside Decon Unit	.002	N/A	N/A
CC-02	NE Corner @ Storage Room	.002	N/A	N/A
CC-03	SW Corner	.003	N/A	N/A
CC-04	Middle of Containment	.002	N/A	N/A
CC-05	SE Corner	<.002	N/A	N/A
CC-06	Field Blank - Inside	Hold	N/A	N/A
CC-07	Fields Blank - Outside	Hold	N/A	N/A
CC-08	Lab Blank	Non-detected	N/A	N/A
Regulatory standard <sup>1</sup>		0.01	<70.0	Not applicable



**Collected and Analyzed by:** \_\_\_\_\_

(Signature)

MTA-1705

<sup>1</sup> Performed using the EPA method specified in 40 CFR Part 763 and ARM 17.74.357.

**FINAL CLEARANCE LETTER**

**APPENDIX E**

**COMMUNITY CENTER**



## FINAL CLEARANCE VISUAL INSPECTION

Project	Heart Butte Gov't Square	Project #	350.0446.000
Building	Community Center	Date	9/10/20
Location	Northside Offices + Storage		
Material(s) Removed	Vinyl Sheet Flooring / SRL 190	MT Project Permit #	N/A

*EDA NESHAP Notification*

**Residual dust identified during visual inspection:**

	Yes*	No	N/A	Comments
Floors		✓		
Walls		✓		
Ledges		✓		
Roof Decking			✓	
Pipes		✓		
Hangars		✓		
Conduits		✓		
Cables		✓		
Light Fixtures		✓		
Ductwork		✓		
Equipment		✓		

\*See comments

Visual Inspection:  PASS     FAIL

**Remarks:** *Conducted final clearance visual with ACM. All vinyl sheet flooring and sheetrock (<1%) removed. No residual dust or debris present in work area. ACM installed paper barrier during abatement. Vapor barrier will remain following clearance air sampling.*

*Prepped work area for aggressive final clearance air sampling*

**Inspected by:** *Ryan D. McGee* (Printed Name)    *Ryan D. McGee* (Signature)    MTA - 1705

**Accompanied by:** *R. Navano* (Printed Name)    *[Signature]* (Signature)    MTA - MT 2542



# AIR SAMPLE COLLECTION FORM

Project: Heart Butte Gov't Square	Date: 9/10/20
Building: Community Center	Calibration Instrument: DryCal
Location: 2000 Southville Vinyl Sheet Flooring / Electrode	Personnel: R. M'Gee
Project No.: 350.0446.000	Permit Number: N/A - EPA NESHAAP Notification to you

Sample ID	Pump ID	Sample Description/Location	Pre-calibration Flow Rate/Time	Start Time	Post-Calibration Flow Rate/Time	Stop Time	Total Time	Avg. Flow	Volume (liters)	Results (f/cc)
Comm -01	14	Final Clearance - Restrooms sw Corner	11.453 12:12	12:37	11.717 2:33	2:33	116	11.565	1,318.340	4.5/100 4.002
Comm -02	Not 4	Star North Rm Corner storage	10.799 12:15	12:36	10.716 2:38	2:38	122	10.750	1,312.476	2/100 4.002
Comm -03	13	South Office - Middle	10.999 12:17	12:35	11.002 2:36	2:36	121	11.051	1,337.171	3.5/100 4.002
Comm -04	15	Middle Containment	10.900 12:18	12:32	10.985 2:34	2:34	118	10.943	1,291.274	3/100 4.002
Comm -05	Not 11	North Storage	11.171 12:20	12:38	10.984 2:31	2:31	113	11.078	1,251.814	6/100 4.002
Comm -06		Field Blank Open 30 Seconds Inside	N/A						↗	
Comm -07		Open 30 Seconds Outside	↓						↗	

\*Notes:

## FINAL CLEARANCE AIR SAMPLE RESULTS

<b>Project</b>	Heart Butte Government Square	<b>Project No.</b>	350.0446.000
<b>Building</b>	Community Center	<b>Date</b>	9/10/2020
<b>Location(s)</b>	Southside Offices, Restrooms, and Storage Area		

<b>Types of Samples Collected:</b>	<b>X</b>	PCM		TEM
<b>Aggressive Sampling:</b>	<b>X</b>	YES		NO
<b>Number of Samples Collected:</b>	<b>5</b>			
<b>Number of Blanks Collected:</b>	<b>2</b>			

## AIR SAMPLE RESULTS

Sample No.	Location	PCM Concentration fibers per cubic centimeter (fibers/cc)	TEM Concentration	
			structures per square millimeter	structures per cubic centimeter
Comm-01	Restrooms Southwest Corner	<.002	N/A	N/A
Comm-02	SE Corner	<.002	N/A	N/A
Comm-03	South Offices - Middle	<.002	N/A	N/A
Comm-04	Middle of Containment	<.002	N/A	N/A
Comm-05	North Corner – Former Storage Area	.002	N/A	N/A
Comm-06	Field Blank - Inside	Hold	N/A	N/A
Comm-07	Fields Blank - Outside	Hold	N/A	N/A
	Regulatory standard <sup>1</sup>	0.01	<70.0	Not applicable

Collected and Analyzed by: \_\_\_\_\_



(Signature)

MTA-1705

<sup>1</sup> Performed using the EPA method specified in 40 CFR Part 763 and ARM 17.74.357.

**FINAL CLEARANCE LETTER**

**APPENDIX F**

**WASTE SHIPMENT RECORDS**

**Northern Montana Joint  
Refuse Disposal District**

**Charge Invoice  
# 42883**

Date: 9/2/20

Billed to:

ACM

Load Volume: 2.58 tons

Transportation Cost: —

Landfill Fees: # 33

**TOTAL DUE**

85.14
-------

Please remit payment to:  
**Northern Montana Joint Refuse Disposal District  
P.O. Box 757  
Conrad, Montana 59425  
(406) 278-3095**

Check will be mailed. NMTJRDD  
PO Box 757  
Conrad, MT

Driver: 59425 *Taitlene*

**LANDFILL**



**Northern Montana Joint  
Refuse Disposal District**

**Charge Invoice  
# 42889**

Date: 9/3/20

Billed to:

ACM
2020 014

Load Volume: 3.15

Transportation Cost: \_\_\_\_\_

Landfill Fees: \$33

**TOTAL DUE**

103.95
--------

Please remit payment to:  
Northern Montana Joint Refuse Disposal District  
P.O. Box 757  
Conrad, Montana 59425  
(406) 278-3095

Driver: R Navarro

**LANDFILL**



NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

2020-014

6111000

If waste is asbestos waste, complete Sections I, II, III and IV
If waste is NOT asbestos waste, complete Sections I, II and III

Bill to 26572

I. GENERATOR (Generator completes Ia-r)

Form I: Generator information including US EPA ID Number (406 N/A), Manifest Document Number (pre numbered), Generator's Name and Location (Government Square site, Heart Butte, Montana), Mailing Address (Blackfoot Environmental Office, Browning, MT), and Waste Profile # (A. Friable Asbestos, B. Non-Friable Asbestos).

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; AND, if this waste is a treatment residue of a previously restricted hazardous waste subject to the Land Disposal Restrictions. I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR 268 and is no longer a hazardous waste as defined by 40 CFR 261.

Form I-p, q, r: Generator Authorized Agent Name (ACM For Blackfoot), Signature, and Date (9-11-20).

II. TRANSPORTER (Generator completes IIa-b and Transporter completes IIc-e)

Form II: Transporter information including Name and Address (Abatement Contractors of MT, Missoula, MT), Phone (406-549-8489), Driver Name (R. Howard), Signature, and Date (9-11-2020).

III. DESTINATION (Generator complete IIIa-c and Destination Site completes III d-g)

Form III: Disposal Facility and Site Address (Republic Services Missoula Landfill, 3737 Coal Mine Road, Missoula, MT), US EPA Number, and Discrepancy Indication Space.

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.
Form III-e, f, g: Name of Authorized Agent (Shelley Howard), Signature, and Date (9-11-20).

IV. ASBESTOS (Generator completes IVa-f and Operator complete IVg-i)

Form IV: Operator's Name and Address (Abatement Contractors of MT, Missoula, MT), Responsible Agency Name and Address (NESHAP Admin: MT DEQ, Asbestos Program, Helena, MT), and Phone (406-444-5300).

e. Special Handling Instructions and Additional Information:

f. [X] Friable [ ] Non-Friable [ ] Both % Friable % Non-Friable

OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

Form IV-g, h, i: Operator's Name and Title (R. Howard), Signature, and Date (9-11-2020).

\*Operator refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation or both

SITE

MISSOULA LANDFILL 406-532-5137  
3737 Coal Mine Road Missoula, MT 59802

CUSTOMER

026572  
ACM  
P.O. Box 8747  
MISSOULA, MT 59807-8747  
Contract:5002203838  
Generator:Abatement Contractors of Montana

SITE TICKET # CELL

01 1368176

WEIGHMASTER

DATE/TIME IN IN Shelley DATE/TIME OUT Tina F.

VEHICLE 9/11/20 8:04 am 9/11/20 8:25 am  
CONTAINER

REFERENCE ACM1 10 YD T

BILL OF LADING 6111000

SCALE IN GROSS WEIGHT 18,600 NET TONS 2.52  
SCALE OUT TARE WEIGHT 13,560 NET WEIGHT 5,040

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	TAX	TOTAL
12.00	YD	Tracking QTY				
12.00	yd	SW-ASBESTOS-FRIABLE Origin:OTHER, THIRD PARTY 100%	\$36.00	\$432.00	\$0.00	\$432.00



Signature \_\_\_\_\_

Thank you for your business

Payment (s)

NET AMOUNT	\$432.00
TENDERED	
CHANGE	\$0.00
CHECK#	

The undersigned individual signing this document on behalf of Customer acknowledges that he or she has read and understands the terms and conditions on the reverse side and that he or she has the authority to sign this document on behalf of the customer.

RS-F042UPR (07/12)

SIGNATURE \_\_\_\_\_



**FINAL CLEARANCE LETTER**

**APPENDIX G**

**RUTHERFORD HOUSE LEAD TCLP ANALYSIS SUMMARY**

## Lead TCLP Analysis Summary

**CLIENT:** NewFields  
 104 E Broadway  
 Helena, MT 59601

CEI Lab Code: C200734  
 Received: 09-24-20  
 Reported: 10-01-20

**Project:** Heart Butte Gov't Square, 350.0446.000

CLIENT ID	CEI LAB ID	Sample Weight (g)	Concentration ppm (mg/L)
TCLP-01	CA3392	100	<0.50

**Regulatory Limit:** 5.0 mg/L

**Reporting Limit:** 0.50 mg/L

**METHOD:** EPA SW846 1311/3010A/7000B

**REVIEWED BY:** 

<b>REGULATORY LIMITS</b>	EPA Action Level = >5.0 mg/L
--------------------------	------------------------------

<b>LEGEND</b>	ppm = parts per million	mg = milligrams	L = Liter
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All lead analyses are performed by a subcontracted accredited laboratory.





Rutherford House - LEAD TCLP COC  
**CHAIN OF CUSTODY**

CEI

730 SE Maynard Road, Cary, NC 27511  
 Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY:	
CEI Lab Code:	C200734 ①
CEI Lab I.D. Range:	CA3392

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #: 26861	Job Contact: Ryan McGee
Company: NewFields	Email / Tel: RMcGee@NewFields.com (406) 461-4037
Address: 104 E Broadway Helena, MT 59601	Project Name: Heart Butte Gov't Square
Email: MHuntington@newfields.com	Project ID#: 350.0446.000
Tel: 406-443-3556 Fax: NA	PO #: Same as Project ID#
STATE SAMPLES COLLECTED IN: MONTANA	

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	8 HR	1 DAY	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (400)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (1000)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM GRAV w POINT COUNT	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM BULK	CARB 435	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCM AIR	NIOSH 7400	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	EPA AHERA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	NIOSH 7402	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR (PCME)	ISO 10312	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	ASTM 6281-15	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM BULK	CHATFIELD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST WIPE	ASTM D6480-05 (2010)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST MICROVAC	ASTM D5755-09 (2014)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM SOIL	ASTM D7521-16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM VERMICULITE	CINCINNATI METHOD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM QUALITATIVE	IN-HOUSE METHOD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTHER:		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REMARKS / SPECIAL INSTRUCTIONS: * Please Provide TCLP sample analysis (5 Day)		<input checked="" type="checkbox"/>	Accept Samples
<del>Use positive stop analysis - RM</del>		<input type="checkbox"/>	Reject Samples
<del>Use point count analysis for results between ND and 1% RM</del>			
Relinquished By:	Date/Time	Received By:	Date/Time
<i>[Signature]</i>	9/23/20 11:45 am	Fed Ex Carrier	9/23/20 11:45 am
		CB	9/24 9:50

Samples will be disposed of 30 days after analysis



CEI

# SAMPLING FORM

C200734

COMPANY CONTACT INFORMATION	
Company: <u>NewFields</u>	Job Contact: <u>Ryan McGee</u>
Project Name: <u>Heart Butte Gov't Square</u>	Sample Date: <u>9/9/2020</u>
Project ID #: <u>350.0446.000</u>	Tel: <u>(406) 461-4037</u>

SAMPLE ID#	DESCRIPTION - LOCATION
<u>TCLP-01</u>	<u>Rutherford House</u> <u>Interior/Exterior Building Materials scheduled for</u> <u>Demolition</u>

**FINAL CLEARANCE LETTER**

**APPENDIX H**

**PROJECT PHOTO LOG AND FIELD NOTES**





Photo 1. Entrance to Heart Butte Government Square. This photo shows the proximity of the Round Hall and Community Center.



Photo 2. Project close-out photo looking southwest at the Round Hall and Fire Garage.





Photo 3. Project close-out photo for lead abatement and repainting of log ends and framework on the main entrance of the Round Hall.



Photo 4. Project close-out photo Rutherford House looking northeast.



Photo 5. Final clearance photo of Rutherford House interior following removal of sheetrock wall and ceiling materials.



Photo 6. Final clearance photo of Rutherford House interior following removal of sheetrock wall and ceiling materials.





Photo 7. Final clearance air sampling following asbestos abatement within the Comes at Night House.



Photo 8. Water damaged subfloor materials in the Comes at Night House kitchen. Owner will be responsible for removal of moldy wood subfloor.





Photo 9. Project close-out photo for lead abatement and repainting of exterior trim on the Comes at Night House



Photo 10. Project close-out photo for lead abatement and repainting of exterior window trim on the Comes at Night House.





Photo 11. Final clearance project photo taken inside the Community Center looking northwest.



Photo 12. Final clearance project photo taken inside the Community Center looking southwest.



- General
- Adams

A = \$5,500 Vermiculite = Δ

7:30 Departed Residence

11:00 On-site - met w/ Chris Rinehart + Burton Butterfly. Conducted walk through of Sr. Center. Discussed scope.

Conducted walkthrough of Clarence Comesat Night's House, discussed scope of work. Carl of BFT on-site, joined on walkthroughs

Conducted walkthrough of Rutherford House, Fire Garage, & Round Hall, discussed scope.

1:30 completed walk throughs and anticipated scope of work on all structures

\* Comes at Night - scope of work confirmed w/ owner. Vermiculite stays, ceiling stays. VSF and subfloor (360 SF) to be removed + LBP on windows. Add Mold treatment. → deduct

\* Firehall - No Change  
~~ACM TCLP waste~~

\* Rutherford House ✓ vinyl visual clearance  
- No LBP [Delete / deduct]

\* Round Hall - No Change

~~ACM~~ ACM to pay for TCLP? include w/ Rutherford House

\* Sr. Center - verify flooring / sub floor. Cafeteria / Kitchen / Back Loading area stays (no impact). Ceiling stays (<1%) OSHA ceiling

N. Portion - No impact [confirm VFT] ↗

S. Portion - Out - Leave Ceiling

S. Portion - Walls / Trim (remove); salvage doors / door frames  
swipe / cut damaged areas? \$5,000 change order

TCLP - Trim - ACM Disposal of Waste  
NF collect Waste Manifest



• 2:30 pm Walkthrough complete w/ Shawn Lair. ~~Mary Anne Hattin~~  
Maryann Hall  
Blackfoot TERO Officer stopped by project. Verified all workers.  
ACM informed of one individual qualified in all phases of abatement work. Chris will keep TERO (Maryann) informed if hired for this project.

• 3pm Chris Rinehart offsite.

Sr. Center has been made available for use of shelter and bathrooms.  
Mr. Butterfly (Burton) will confirm the building is secure at the end of the work day. Mr. Butterfly's Phone number 338-2222 [Kitchen Phone]

• Clarence Comes at Night → 845-9807  
338-3008

\* Discussed / Reviewed Site Specific Health + Safety Plan w/ ACM 8/31/20. Individuals present  
Ryan D. [Signature] Jim D. [Signature]  
R. Navar [Signature] Kit Anne [Signature]

• Carl McLean → 845-8288

9/3/20 - 125 - 63 hrs, Travel Included,

→ Invoices Updated Adam Johnson on Heart Butte Gov't Square

~~Applying in AK am~~

9/8/20 - ACM on-site, starting on Clarence Comes AT Night's Residence. All sheetrock 2% ACM in mud (joint compound) removed from the Rutherford House and Community Center