# Caribou Village Shopping Center Fire Clean-up

## ABATEMENT VARIANCE WORK PLAN AND PROJECT DESIGN

## Removal Phase

Caribou Village - Nederland

20 Lakeview Dr
Nederland, CO 80466

Initial Submission – March 2, 2026, Revised March 17, 2026
Revised March 30, 2026, Revised March 31, 2026

**Prepared for:** Colorado Department of Public Health and Environment
Air Quality Division

**APPROVED**
***By Curtis Burns at 12:25 pm, Apr 01, 2026***


**Presented by:**
Earth Services & Abatement, LLC

Dave Neumyer, Director of Abatement Services
Mobile: 608-438-5701
Email: dave.neumyer@esasite.com
Project Designer – 29455

EARTH SERVICES & ABATEMENT

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# 1 INTRODUCTION

Earth Services & Abatement, LLC (ESA) has developed this Abatement Variance Work Plan and Project Design to address contamination following the fire which occurred on October 9, 2025. The fire affected all the units associated with the shopping mall at 20 Lakeview Drive, Nederland, CO 80466. The fire destroyed the entire building. This reduced the structure to rubble; and rendered the structure structurally unsound. ESA has prepared this work plan in support of a variance request in accordance with Section III.W. Structurally Unsound Building of Colorado's Regulation No. 8, Part B. ESA has been contracted to perform the abatement and controlled demolition of the rubble and buildings damaged in the fire. Dave Neumyer, Project Designer (PD Certification #29455) visited the site on January 23, 2026, to assess the site and prepare this plan. This variance work plan is for the Removal Phase of the project. Additional details for the overall project and this specific phase are in the sections below.

## 1.1 OVERALL SITE CONDITIONS

According to sampling and visual inspections carried out by WEC's Colorado-certified building inspector, there are about 18,591 square feet of ash and debris, as well as parts of the remaining structure, within the building footprint that require cleanup.
Additionally, a field of debris are located outside the building footprints—in the parking lot and along the exterior perimeter of the secured area.
Access to the entire spill area has been restricted with a locked six (6) foot perimeter fence and security detail. Wind fencing has been installed. This fencing will be used as part of the Regulated Work Area (RWA), but most will be used as both a secondary barrier as well as maintaining the overall site as an Authorized Personnel Only area outside of the RWA. Straw wattles have been installed and maintained along the perimeter fence. This fencing and wattles will remain in place and be inspected weekly by the Air Monitoring Specialist (AMS) and/or site Supervisor and be maintained throughout the project as a secondary barrier to the fencing. Wattles shall be wrapped in 6-mil poly to prevent absorption of water and provide an adequate retention of site runoff. Given the damage to the buildings reduced to rubble and/or structurally unsound, it has been determined that the only way to safely clean up the rubble and debris in accordance with Section III.W. (Structurally Unsound Facilities) of Reg. 8. This will require the submission of a Variance Request to the CDPHE, as outlined in Section III.F. (Alternative Procedures and Variances) of Reg. 8 for each phase of this project.

## 1.2 REMOVAL PHASE SUMMARY

This variance work plan is specific to Removal of the overall project. This includes the removal of ash, debris, and damaged building materials/structures within the footprint of the Caribou Village Shopping Center as well as the perimeter of this building. The total area of removal for this phase is 18,591 SF. ESA estimates a total of 3,659 CY of ACM waste being removed (13,441 55-Gal Drums) during this phase. Delineation of the overall phase can be found in Exhibit 1.This abatement variance work plan describes the necessary engineering controls, work methods and appropriate mitigation to minimize the release of fibers during open-air abatement (controlled demolition/debris removal) and help prevent the migration of fibers out of the Regulated Work Area (RWA).

# 2 AUTHORIZED PERSONNEL SITE REQUIREMENTS

Only authorized personnel will be permitted to enter the RWA. This section details the requirements for training, Personal Protective Equipment (PPE) and requirements for entrance.

## 2.1 TRAINING AND CERTIFICATION REQUIREMENTS

All abatement personnel (including operators) will have the following certifications and training:

- Current U.S. EPA / Hazard Emergency Response Act (AHERA) 40-hour Contractor / Supervisor training and CDPHE Regulation 8 Supervisor Certification where applicable.
- Current U.S. EPA AHERA 32-Hour Worker training and CDPHE Regulation 8 Worker Certification where applicable.
- Current EPA / AHERA refresher course training.
- Current Colorado certification for the appropriate discipline.
- Current annual physical with medical release / respirator usage form and respirator fit test.
- Appropriate Occupational Safety and Health Administration (OSHA) training including but not limited to, Hazard Communication, Respiratory Protection, Ladder/Lifts, and the proper use and limitations of assigned PPE.

All consulting personnel will have the following:

- A current U.S. EPA / Hazard Emergency Response Act (AHERA) 24-hour Building Inspector training and 32-hour Air Monitoring Specialist (AMS) training.
- Current EPA / AHERA refresher course training for each discipline.
- Current Colorado certification for each discipline.
- A current annual physical with medical release / respirator usage form and respirator fit test.

All truck drivers who enter the work area will adhere to the following parameters:

- Drivers will always remain inside their vehicle.
- Drivers will keep the windows closed.
- The vehicle air conditioning/heating system will be turned off.
- The vehicle engine will be turned off during lining, loading, and wrapping activities.

## 2.2 PERSONAL PROTECTIVE EQUIPMENT REQUIREMENTS

ESA will provide personnel with the proper PPE necessary to safely perform their specific tasks. PPE will, at a minimum, include respirators, disposable protective coveralls, steel toe footwear, head protection, eye protection, and gloves. All personnel are required to wear disposable clothing (such as a Tyvek® suits) with no street clothing underneath and a minimum of a half-face respirator equipped with HEPA P-100 filtration while inside the RWA.

Authorized personnel will comply with OSHA 29 CFR 1926.1101 and OSHA CFR 1910.134 and the ESA Respirator Protection Plan/Program. All respirators worn during work activities will be NIOSH certified and accepted by OSHA for use to protect against inhalation of fibers. Each worker must perform positive- and negative-pressure fit checks every time a respirator is used.

## 2.3 ENTERING AND EXITING THE RWA

Entering and exiting the RWA will be through a 3-stage decontamination unit connected to the RWA. Approximate location in Exhibit 1. ESA will be using a decon trailer for this project. The unit will be set up and fully functioning prior to any work being performed inside the RWA, including during site set up. The three-(3) stage decontamination chamber shall be constructed in accordance with CDPHE Regulation No. 8, Section III.K, to include a Clean Room, Shower, and Equipment/Dirty Room. The Clean Room will be adequately sized to accommodate the crew, as well as their clothing and equipment. A TEM presence/absence air sample will be collected daily from inside of the Clean Room as described in Section 6 Air Monitoring. Hot and cold potable running water shall be available and adjustable at the tap for worker decontamination within the Shower. The Equipment Room will be adequality sized for storage of personnel clothing, gear, equipment and tools at the end of each work shift. A negative air machine will be attached to the Equipment/Dirty Room of the decontamination unit and will be in use when the site is active. The air flow through the decontamination unit will be smoke tested at the start of each work shift

by the Supervisor and documentation will be kept on site. Wastewater from the decontamination unit will be collected and filtered to 5.0 microns and disposed of into the onsite sanitary sewer. Under no circumstance will unfiltered wastewater be reused to wet ACM or any material inside the RWA.

Authorized personnel will enter and exit the RWA through the decontamination unit. Personnel entering the RWA will remove their street clothes and don disposable suits, HEPA filtered respirators and other pertinent PPE such as rubber boots, head, hand and eye protection in the Clean Room. They will then progress through the Shower and Equipment/Dirty Room and enter the RWA. When exiting the RWA, personnel will remove and dispose of their protective suits in the Equipment/Dirty Room. Once all items have been removed, they will progress into the Shower chamber where they will wash any potential contamination from their bodies and doff their respiratory protection. They will then enter the Clean Room where they change into their street clothes.

# 3 SITE PREPARATION

## 3.1 REGULATED WORK AREA and Adjacent Structures

To maintain control of the site and prohibit entry by unauthorized individuals, access to the work site is and will continue to be restricted with a locked six (6) foot perimeter fence which has wind fencing installed. ESA will remove the existing wind screen before the removal process begins. In its place ESA will install wind screen on the immediate work area. ESA will establish the overall Regulated Work Area (RWA) using additional six (6) foot perimeter fencing, signage, and wind protection. Wind protection will consist of fencing equipped with wind-breaking mesh material. The RWA fencing will be located surrounding the footprint of the rubble on all sides. Portions of the existing fencing will be used as part of the RWA. ESA will install additional fencing as needed where the current fence is not close enough to the spill and RWA. This additional fencing is shown in Exhibit 1. The remaining fence that is not being used for the RWA will remain in place and continue to restrict access to the work site but not part of the RWA.

There are adjacent structures outside of the spill area but within 150 feet of the RWA. Prior to the start of the removal activities ESA will offer to install 6-mil polyethylene critical barriers to cover the windows and non-utilized vents and doors which face the work area and are within 150 feet of the RWA. Details on the locations of the critical barriers can be found in Exhibit 1.

## 3.2 BERMS

Berms consisting of sediment booms wrapped in 6-mil polyethylene to prevent absorption will be placed within the RWA. The berms will be no less than 6” high and will surround the work area to protect against water escaping the project site. The sediment booms will be disposed of as asbestos-containing waste material (ACWM) at the end of the project. The on-site ESA Supervisor and/or the AMS will inspect and document the condition of the berms daily throughout the length of the project. Damaged berms will be fixed and/or replaced, as needed. There are two manhole covers located within the RWA that are currently covered by debris. Based on Google Street View, the cover on the west end looks to be a storm drain cover and the cover on the east end looks like a utility vault cover. Regardless, both covers will be lined with berms and covered to prevent water from entering. The manholes covers shall be removed, evaluated by the AMS for the presence of building debris. If debris is discovered, a work plan to decontaminate the manholes shall be provided to the Division for review and approval. Details on the locations of the berms can be found in Exhibit 1.

## 3.3 LOADING/DECONTAMINATION STATION

A truck Loading/Decontamination Station will be constructed directly adjacent to the removal area within the RWA, as indicated in Exhibit 1. Any changes to the location will be communicated with CDPHE with an addendum and modification to the permit. The perimeter of the Station will be surrounded with a berm

consisting of sediment booms wrapped in 6-mil polyethylene to prevent water from migrating in or out. The berms at the entrance and exit of the loading station will be moved each time a truck enters and exits the station to prevent the berms from being crushed. The Loading/Decontamination Station will have a minimum of two (2) layers of 10-mil reinforced polyethylene sheeting on the ground which extends up the sides of the berm. These mitigation measures will be maintained in good working condition, and water will not be allowed to pool in the Loading/Decontamination Station. The Loading/Decontamination station will follow the progression of the debris removal as the phase progresses. The removal and setting up of each move will follow this plan to include final visual clearance, disposal of poly for booms and drops, and relocation of booms to new sub-phase.

The polyethylene sheeting will be inspected by the AMS between each load, any torn sheeting will be replaced immediately; the damaged sheeting will be disposed of as friable ACM waste. It is the responsibility of the supervisor and the on-site AMS to ensure the cleanliness and integrity of all ground polyethylene sheeting. The loading area shall be kept clean, and workers will remove any debris that falls between trucks using HEPA vacuums, water, and squeegees as necessary to keep the truck fenders and tires clean from contamination. Wastewater collected from the loading area shall be filtered to a fiber size of 5.0 microns and discharged into the sanitary sewer. The station and the trucks will be visually inspected by the AMS prior to the exiting the area. No debris will be present before exiting. trucks/side dump trailers will be HEPA vacuumed and wet wiped with water, as necessary.

## 3.4 WRAPPING STATION

A truck/waste-container Wrapping Station will be constructed near the removal area within the RWA. The location of the station is shown in Exhibit 1. The Wrapping Station will have a minimum of two (2) layers of 10-mil reinforced polyethylene sheeting on the ground. The polyethylene sheeting will be inspected by the AMS between each load, any torn sheeting will be replaced immediately; the damaged sheeting will be disposed of as friable ACM waste. It is the responsibility of the supervisor and the on-site AMS to ensure the cleanliness and integrity of all ground polyethylene sheeting. At the Wrapping Station, the inside liner will be independently overlapped and sealed using spray glue and duct tape. The outside layer will then be sealed by rolling the sheeting and mechanically fastening around wood strips. The Wrapping Station and the trucks will be visually inspected by the AMS prior to exiting the RWA, and no debris will be present before exiting the RWA. trucks/containers will be HEPA vacuumed and wet wiped with water, as necessary.

## 3.5 STEEL CLEANING AREA

The Steel Cleaning Area(s) will be constructed within the RWA in areas that have already been visually cleared. They will be set up strategically to minimize the distance to transport the steel through the RWA. The entire cleaning area will have a 50'X50' 10-mil reinforced poly liner covering the concrete. A 40'X40' area will be constructed using 10-mil PVC liner with a raised perimeter using sediment booms wrapped in 6-mil polyethylene. The steel pieces will be set on stands to allow for complete cleaning of the materials. The water generated during the cleaning process will be collected into drums/totes using vacuums, the contaminants will be filtered out of the water using a 5-micron filtration system and discharged to the sanitary sewer system located adjacent to the work area. If the town of Nederland doesn't allow for any discharge into the sanitary sewer system collection tank will be brought to the site to hold water until it's transported to a approved discharge facility. The steel will be scrubbed with nylon brushes. The steel will be wiped with clean rags. The steel will be rinsed with fresh water.

# 4 REMOVAL OF DEBRIS

## 4.1 EQUIPMENT TO BE USED

ESA will utilize the following heavy equipment on the project within the RWA:

- One (1) – 80-100K LB Excavator with hydraulic thumb/grapple and mister bar system.
- One (1) – 80-100K LB Excavator with hydraulic shear and mister bar system.
- One (1) – Skid Steer Loader with hard tires, hydraulic grapple, and mister bar system.
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- Two (2) – 53' Wrapping/lining flatbed trailers or s to allow for safe wrapping and lining
- One (1) – Water cannons (DustBoss or similar)

ESA will utilize the following heavy equipment on the project outside the RWA:

- One (1) – 4,000 Gallon water truck
- One (1) – 500 Gallon water trailer

## 4.2 WASTE HANDLING PROCEDURES

### *4.2.1 WETTING PROCEDURE*

Prior to disturbance and during removal and loading of material, the debris will be adequately wetted with water. No surfactants or other chemicals will be added to the water at any point. A fire hydrant will be utilized for a continuous source of water to fill the water truck and trailer. The water will be applied at a pressure that does not generate fugitive dust, create splattering, or dislodge debris/soil at the point of contact. Water trucks will be equipped with a tank, water pump, and 1 ½"-inch hoses with adjustable nozzles and backflow preventer. The excavator buckets shall be equipped with a low-pressure distribution system (misting bar) for general dust suppression while debris is being handled by the excavator bucket, the misting bar is not intended to wet the material. The misting bar will constantly mist points of contact for the bucket and debris to avoid the release of fibers as waste is being handled. It is not intended to wet the material. Misting cannons (BossTek DustBoss® or similar) will be utilized near the area of active removal to assist in the suppression of any generated dust. The misting cannons will use the water from the water trucks. These are to be utilized as a supplementary wetting system; it does not replace the 2-hose wetting system as detailed in the following paragraph.

The debris will always remain adequately wet during the open-air abatement, cleanup and loading activities. To achieve this, two workers will be assigned to the wetting of the debris prior to and during removal, demolition, and loading activities. Water will be applied by mist/fog and no direct jet spraying will be allowed. The AMS will observe these procedures to evaluate the effectiveness of the wetting process so that no visible emissions are generated. The workers will wet the debris for a period of no less than 10 mins prior to starting removal in specific areas. These workers will then be positioned to allow them to constantly be wetting at the point of contact of the bucket and debris during removal and loading of the debris.

### *4.2.2 Open-Air Abatement/DEBRIS REMOVAL*

Following the set up and pre-wetting the debris removal and abatement will begin. The work will be conducted in a slow, controlled and methodical manner. All work performed will be completed using the wetting process detailed in the above sections. The demolition of the structures, or portions of structures, will be performed from the top-down. Pieces of debris will be directly loaded into lined truck trailers as it is demolished/removed, debris and stockpiles shall not accumulate. Where there are piles of ash, debris, and rubble the machine will grab an amount not exceeding ¾ of a full bucket to avoid spillage or dropping debris and can be securely loaded into the trucks with minimal materials dropping from the load. The load will be directly loaded into the lined trucks.

There is a substantial amount of steel (I-beams, columns, etc.) in the ash, debris, rubble, and remaining portions of the structures. To safely remove the steel and debris the steel will be segregated from the

structures and piles by clipping the steel using the excavator equipped with shears. The shears will cut directly through the steel to free it for transport to the Steel Cleaning Area(s) or loaded into trucks. Any steel structures that are being cut will be lowered to the ground to prevent it from falling to reduce the risk of dust emissions. The cut steel will be transported to the Steel Cleaning Area or loaded into trucks as soon as safely possible. The debris and remaining building materials will be removed down to the concrete slab and the slabs will be left in place and cleaned.

The excavator will methodically progress through the RWA to access the ash, debris, rubble, and remaining portions of structures. The Removal Phase will be broken up into four sub phases as detailed in the revised Exhibit 1 with site photos based on current site conditions. The excavators will remain outside the building footprints until enough debris is removed to keep from tracking on debris. Demolition within the RWA will progress along the footprint of the buildings. There is no foreseeable instance that any disturbed waste/debris will be tracked or driven over by any equipment. The excavators will be equipped with a long enough boom and arm to keep the excavator off the debris during the removal. The work methods will not include munching, sizing, processing or reducing the size of the ash, debris, and rubble. The lined truck trailers will be loaded in the designated loading areas located adjacent to the active sub-phase (Exhibit 1). Disposal trucks will be placed a safe distance away from the impacted ACM materials to ensure a controlled placement of waste in the trailer is achieved. Debris will be placed into the lined trucks using the excavator.

Broken floor tile debris in the newly cleared corridors and shall be removed using hand methods and adequate wetting. This work will happen before general abatement activity. In addition, the floor debris will not be traversed by foot traffic or equipment.

If exposed soil is encountered within the area approximately six (6) inches of soil will be removed using the excavator equipped with a misting bar, bucket, and I-beam scraper. The area to be removed will be pre-wet and kept wet with water using the process detailed in Section 4.2.1 WETTING PROCEDURE. The removed soil will be placed directly into the lined trucks for disposal, with no stockpiling allowed. If suspect debris is observed following the removal of six (6) inches of soil, additional soil will be removed in six (6) inch increments until the soil is visually inspected by the Building Inspector/AMS and found to be clean. Heavy equipment shall not track across building debris at any time.

## 4.3 TRANSPORTATION

Open topped trucks will be used on this project for regulated waste removal. They will be lined, loaded, and wrapped at the designated stations shown in Exhibit 1.

### *4.3.1 TRUCK LINING/LOADING/WRAPPING*

At the Lining Station the trailers will be lined with a 6-mil slip liner so that the plastic sealed materials are able to be removed from the truck without damage. The slip liner will cover the entire truck bed. Following the installation of the slip liner, the truck bed will be lined with two (2) layers of 6-mil reinforced polyethylene sheeting. After the lining is complete the truck will move to the Loading Station (locations identified in Exhibit 1) and loaded as detailed in the section above. Once the materials have been loaded into the truck, the truck will be inspected and cleaned as needed and move to the Wrapping Station. At the Wrapping Station, the inside liner will be independently overlapped and sealed using spray glue and duct tape. The outside layer will then be sealed by rolling the sheeting and mechanically fastening around wood strips. Multiple waste generator labels shall be placed in between the layers of disposal of polyethylene. The exterior of the liner will then be wet-wiped, and HEPA vacuumed, if necessary. After the waste packaging, wrapping area and the truck have been inspected by the AMS, the truck will be allowed to leave the area for transport to the landfill. Once outside the area, the waste load will be covered by a tarp for transport to the landfill.

### 4.3.2 WASTE DISPOSAL/TRANSPORTATION

ESA will direct the schedule of transportation of waste. After loading and inspection, trucks will be assigned a waste manifest to serve as the shipping document for that load. Unloading at the landfill will be done according to the best practices and requirements of the facility. Waste will be unloaded in a slow and non- destructive manner.

If an spill occurs outside of the regulated work area, the following spill response actions will be implemented:

- Restrict access to the spill area.
- Place warning signs in the spill area.
- In accordance with Regulation No. 8 Section III.T.1., immediately notify the CDPHE that a Major Spill (Section III.T.2.) has occurred. The driver should contact emergency services, if needed for assistance in restricting the spill area, until spill clean- up can be performed.
- Submit a spill response plan to the CDPHE for review and approval prior to performing spill response actions.
- All spilled debris will be repacked and containerized in accordance with the lining and wrapping procedures outlined in section 4.3.1.
- Properly dispose of the spilled waste.
- Clean the equipment and surfaces using High Efficiency Particulate Air (HEPA) filtered vacuums and wet cleaning methodology. Care will be taken to control any generated wastewater. The generated wastewater will be filtered to five (5) microns and discharged to a sanitary sewer.
- Have the spill area visually inspected by an AMS prior to the removal of equipment and demobilization from the site.

## 4.4 STEEL AND TENANT CONTENT CLEANING

To reduce the quantity of debris being sent to the landfill, allow for recycling of materials, and reduce the risk of liners being damaged in transport; ESA will clean all structural steel that is contaminated with presumed ACM from the fire. All structural steel, intended for recycling, inside the regulated work area shall be cleaned and cleared in accordance with the approved variance. This includes I-beams, columns, and other plate steel. It does not include corrugated steel roof/wall panels, equipment pieces, non-structural steel items, or items heavily damaged by the fire. The process for the cleaning will start during the segregation of the steel from the remaining debris. During this time the pieces will be wet down with water to prevent dust and debris from becoming airborne. The pieces will be inspected to determine if they can be cleaned or not. Any pieces that cannot be easily cleaned using wet wiping methods and nylon brushes, have caked/burned on debris, or are heavily damaged by the fire will be disposed of as ACM waste and loaded into trucks for disposal as detailed above. The pieces of steel that can be easily cleaned using wet wiping methods will be transported directly to the cleaning area where it will be set up on the stands or racks to help facilitate cleaning.

The steel will be transported to the cleaning area using the loader and/or excavator. The transportation efforts will follow the demolition/loading activities where debris has already been loaded and there is no visible debris. The transportation of the steel will take place prior to final cleaning and clearance of the individual sub phase. At no time will the equipment track or roll over debris. The equipment will move from the active removal/demolition location to the Steel Cleaning area within the active RWA zone. The transportation route will be kept wet using water by the dust bosses and the workers running the water hoses. The equipment will transport materials within this area at no more than 5 MPH to prevent dust emissions. The items will be placed in the Steel Cleaning area and will be cleaned using rags and/or mops wetted with water. The steel will then be cleaned again using HEPA vacuums. When pieces are fully dry, the AMS will visually inspect and clear each piece of steel before it is removed from the cleaning area. The cleaned/cleared steel will be lifted out of the cleaning area using equipment staged outside the RWA. The area where cleaned/cleared steel will be staged in located on the subphase site plans. The steel will be loaded into trucks and hauled to the recycling facility.

Several tenants have indicated that they hope to recover contents from the rubble and debris. During the course of removal, crew members will sift through the rubble and debris as safety allows. This will be an ongoing process throughout removal. The equipment operator will periodically pause during removal to allow for the crew members to look through newly uncovered debris or access areas that were previously unsafe to walk in and around. If tenant contents are found, the items will be transported to the content decontamination area. Temporary full containment will be set up inside of a storage container (see ex 1 for location). The containment will be used to thoroughly clean the contents. The containment will be filled with contents to a practical level that still allows crew members to move and clean within the container. After cleaning is complete, the AMS will enter the containment to visually inspect the contents for dust and debris. After passing a visual inspection, the AMS will conduct a final air clearance (FAC). With the successful completion of the FAC, the containment will be deconstructed as necessary and contents will be returned to the owners or their representative. This process will be repeated until all recoverable tenant contents have been recovered. The final number of items to be cleaned will be by the owner.

## 4.5 FINAL CLEANING

Upon completion of all removal activities within each sub-phase, HEPA vacuuming and wet wiping of all cleanable surfaces, concrete and asphalt that remains in the RWA will be completed. These surfaces will be cleaned (HEPA vacuumed and wet wiped with water), visually inspected and left intact. The final cleaning will take place within the Sub-Phase once all debris is removed, and all steel has been cleaned and removed from the Steel Cleaning Area. The sub-phase active RWA, Loading Zone, and Steel Cleaning Area will be final cleaned and visually cleared prior to beginning the next Sub-Phase. All debris from inside the RWA, including concrete, metal, wood, glass, plastic, polyethylene sheeting etc. will be disposed of as friable ACM waste. A Colorado-certified AMS will be responsible for inspecting the RWA for the presence of any remaining debris. Only the AMS can visually clear the work area and release de equipment from the RWA. The inspection can occur only when the area is completely dry.

## 4.6 EQUIPMENT DECONTAMINATION

All equipment which was used in the area that will not be used in the next phase will be cleaned with HEPA filtered vacuums and/or water in conjunction with nylon brushes, small-bladed shovels and other hand tools as necessary to remove any gross contamination materials. A decontamination pad will be constructed using a minimum of 10-mil reinforced polyethylene sheeting. The pad will be surrounded with a berm consisting of sediment booms wrapped in 6-mil polyethylene to prevent water from migrating in or out so that all decontamination liquids and solids are collected and disposed of as friable waste. The water generated from this operation will be filtered to five (5) microns and discharged to a sanitary sewer or collection into a tank on site for discharge later. Following the decontamination procedure and once completely dry, the equipment will be inspected by the AMS prior to removal from the regulated work area. The polyethylene liner will be disposed of as waste.

## 4.7 COLD WEATHER WORK PLAN

This section contains added requirements for conducting abatement activities in extremely cold, outdoor conditions. This is a common occurrence in Colorado, often presenting significant challenges in protecting the environment and workers. Any work performed when the exterior temperature is 32° Fahrenheit (F) or below triggers the use of this cold weather work plan. All work must stop if the temperature impacts the engineering controls or does not allow the controls to be effective. Work may resume under this cold weather work plan when effective temperatures return.

### 4.7.1 WETTING PROCEDURES & FREEZE PROTECTION

To ensure this plan will be implemented in cold weather or freezing conditions, water supply or delivery systems shall not be allowed to freeze up. ESA will ensure sufficient water flow through implementing the following:

- Insulate exposed tanks, hydrants and tap connections.
- Apply heat tape to exposed water hoses/above-ground supply lines at freeze points.
- Drain water hoses/supply lines daily after each shift.
- Store hoses in a heated area overnight.
- Heat showers and change areas, both for worker safety and to prevent freezing of the water supply. This includes applying heat tape or heating cables on hoses/supply lines for the shower of the decontamination unit.
- Increase hot water storage/delivery to the shower of the decontamination unit to ensure an adequate amount of hot water for all people in the RWA to properly decontaminate.
- Spray affected surfaces with a consistent application shortly before and during excavation activities and minimize water application to only those surfaces being actively worked. Do not pre-wet areas that will not actively be managed during that shift.

### 4.7.2 SOIL INSULATION

Insulate soil areas scheduled to be worked the following day by covering surfaces with polyethylene sheeting. This will provide a few degrees of added warmth as well as reducing overnight frost accumulation. If work must proceed after overnight temperatures of 17° or less, substitute insulated concrete blankets for polyethylene sheeting. Polyethylene sheeting if utilized will be disposed of as ACM waste directly after use and if concrete blankets are used for extra ground protection they will be disposed of as ACM waste at the conclusion of the project.

### 4.7.3 WORKER PROTECTION

Aside from heating the decontamination area as described above, workers shall use double-suiting to provide a layering effect. If disposable Tyvek® (or comparable brand) suit layers are not sufficient to keep workers warm, or operating temperatures are below 20°F, ESA shall supply insulated cloth coveralls to provide a further layer of protection. Cloth coveralls used in the RWA shall remain in the Equipment/Dirty Room of the decontamination unit when not in use, handled as clothing, and disposed of as ACWM at the conclusion of use or the project.

Provide waterproof ponchos or rain gear for workers applying water or working near water application. Provide insulated, waterproof gloves to all workers. Gloves, head coverings, and other worker PPE shall remain in the Equipment/Dirty Room of the decontamination unit when not in use, handled as clothing, and disposed of as ACWM at the conclusion of use or the project.

The Equipment/Dirty Room and Clean Room of the decontamination unit will always remain at a comfortable working level during work hours, as this provides workers within the RWA a space to recover body heat. Rotate workers allow each a 10-minute warming break every 1-1.5 hours, or more frequently as necessary, depending on extremity of cold conditions. The Clean Room must be sized to accommodate warming breaks, cold weather clothes, and cold weather PPE of the work crew.

### 4.7.4 EQUIPMENT PROTECTION

Use electric block heaters to prevent solidification of fuel. After warming the engine to operating temperatures, slowly test the range and operation of all mechanical and hydraulic functions. If temperatures are single digit or below, engine-block heaters may not be sufficient for safe operation of diesel engines. Only attempt performance if operations are critically necessary. Delay any other activities until temperatures are safe for operation.

# 5 WIND MONITORING

Periodic wind speed measurements will be taken during all active building debris removal in accordance with Section III.W.2.j. of Reg. 8. Readings will be taken and recorded by the AMS every 15 minutes throughout the workday. This frequency will be increased at the AMS's discretion when it has been determined that wind conditions may be approaching threshold limits. It will be the responsibility of the AMS to take and record all wind speed measurements onto the daily logs. All wind speed measurements will be taken outside of the RWA but within the Authorized Personnel Only Work Zone in locations near the active abatement area. The following are conditions where work will be shut down and started:

## 5.1 SHUTDOWN CONDITIONS

Activities involving the removal or disturbance of ACM should immediately cease when one (1) or more of the following conditions have been met:

- Any wind gust reaches or exceeds 20 miles per hour (mph) as determined by the hand-held instrument,
- Sustained wind speeds reach or exceed 12 mph averaged over a 10-minute period,
- Winds produce visible emissions or create movement of dust or debris in or near the work area or loading area, or
- Winds are producing visible emissions or creating movement of dust or debris in the abatement site,
- Winds are impacting any engineering controls and preventing them from functioning as designed.

## 5.2 STARTUP CONDITIONS

Activities involving the removal or disturbance of ACM may resume after *ALL* of the following conditions have been met:

- All wind gust readings drop below 20 mph for a period of 20 minutes as determined by the hand-held instrument,
- Sustained wind speeds are below 12 mph averaged over a 20-minute period,
- Winds no longer produce visible emissions or create movement of dust or debris in or near the soil removal area, and
- Winds are not impacting any engineering controls and prevent them from functioning as designed.

# 6 AIR MONITORING

A CDPHE-certified Air Monitoring Specialist (AMS) will perform all air monitoring activities at the site to determine the adequacy of engineering and environmental controls employed at the site. The sampling will include monitoring of personnel located within the work area, monitoring of the work area, and monitoring of the clean room located in the remote decontamination unit.

Air monitoring samples will be collected throughout the project using the procedures outlined below. This includes, but is not limited to, all removal, loading, investigation and equipment decontamination activities. Air monitoring will continue throughout the length of the project until final clearances have passed. An air monitoring log will be kept onsite throughout the duration of the project. The log will record sample locations, date and time of sampling, air volume, and sample results.

## 6.1 SAMPLING MEDIA

Air samples will be collected by drawing air through a 25-millimeter mixed cellulose ester filter, 0.45-micron pore size, with an open-faced, long cowl. The flow rate and the volume of the air passed through the filter will be determined based on TEM presence/absence protocols. During the collection of each air sample, an attempt will be made to collect the highest volume of air possible based on the capacity of the sampling pumps used and the duration of the work being performed. Each pump will be calibrated before and after the collection of each sample using a primary calibrator TSI Calc 4100 series flow meter.

## 6.2 SAMPLE ANALYSIS

Sample analysis will be performed by a microscopist using Transmission Electron Microscopy (TEM) presence/absence methodology. All air samples will be submitted to a National Institute for Standards and Technology (NIST) NVLAP accredited laboratory.

## 6.3 AIR MONITORING

Personnel monitoring, area of disturbance perimeter sampling and decontamination unit sampling shall be collected on TEM sample media using low-flow battery operated pumps. High flow pumps may be utilized in place of low flow pumps if concerns in air volume quantities arise during the project. Depending on the work area and type of personnel utilized, air samples will be collected daily during variance-approved open air abatement activities as described below:

*Perimeter Air Samples:*
During open air abatement activities, between 4-7 perimeter air samples will be collected daily to attain sufficient coverage. The samples will be placed inside the RWA wind fencing and adjacent to the current open air abatement activities without interfering with the abatement/demolition operations. The sample locations will follow the progression of the activities (north to south within the building footprints). The AMS is required to take into consideration the structures that are confirmed structurally unsound and/or assumed structurally unsound so that the safety of the AMS and the samples themselves are not compromised throughout the project.

*Point of Source Air Samples:*
During open air abatement activities, Point of Source (POS) air samples shall be collected on at least two crew members or 25% of the workforce, whichever is greater who are anticipated to have the highest possible level of exposure. These air samples differ from the OSHA personal samples that ESA will collect on their crew. Depending on the work area and type of personnel required, it may include a combination of the following as applicable:

- Excavator operator within cab
- Loader operator within cab
- Water hose operator
- Wrapping station worker(s)
- Steel cleaning station worker(s)

Samples will be analyzed by TEM to determine presence/absence of fibers. Results of TEM sampling will be used to assess the effectiveness of work practices, engineering controls, and to evaluate if work practices are adequately controlling fiber emissions. TEM verbal results will be available to the contractor as soon as practicable on the next business day. Hard copy sample results should be onsite within 48 hours of sample submittal. Active work times will be dependent on sampling time to ensure results are received the next day. Open air abatement activities will cease if TEM verbal results are not received by noon the following day of sample submittal and TEM hard copy written results are not on site within two working days of sample submittal. Subsequently, activities may commence, as appropriate, under proper receipt of such laboratory results. A Colorado Certified AMS with “stop work authority” will remain onsite during activities that will impact the assumed asbestos containing material. The AMS will maintain a daily air monitoring log.

If results indicate structures are present, work will stop and CDPHE will be notified. Photos of the current site conditions will be provided to the CDPHE along with lab results, a map of sample locations, highlighting the sample(s) where was detected, and the prevailing wind direction. An explanation of the possible source of the detection and a proposed corrective action plan to prevent the recurrence of airborne fibers will be submitted. Site work will not resume until the CDPHE provides written approval.

# 7 FINAL VISUAL INSPECTIONS

## 7.1 RWA VISUAL INSPECTIONS

Once the loading and removal of all asbestos-containing debris and asbestos contaminated and ACS is complete, final cleaning has been conducted, and the work area is dry; the AMS shall perform a Final Visual Inspection in the RWA to evaluate whether any debris remains. All polyethylene sheeting from the loading/wrapping areas and berms will be removed prior to the final visual inspection. Most of the remaining areas will be concrete with some sections being soil. To facilitate visually clearing the RWA, the AMS will divide the work area into grids. Each grid will be walked in a serpentine manner and visually inspected to ensure the exposed soil and hard-scaped surfaces are free of all debris. Each grid will be demarcated with pin flags or marking paint and documented once a successful visual clearance has been determined by the AMS. Any grid that does not pass visual inspection will be recleaned using the same methods described in this document.

To allow the loading station to be as close to the active work area as possible, the completed grids within the phase and/or the complete sub-phase will be inspected while additional work is to be completed. The cleared areas will still be within the phase RWA. However, trucks will be able to move within this area from the Lining Station to the relocated Loading Station and from the Loading Station to the Wrapping Station.

The phase will be considered completed when all surface grids have been visually cleared by the AMS, and no visible debris or polyethylene sheeting remains within the RWA. Additionally, the decontamination pad, soil berms, decontamination chamber and perimeter wind fencing will be cleaned and visually cleared of any mud, dust and/or debris by the AMS prior to clearance and teardown of the RWA.

## 7.2 EQUIPMENT VISUAL INSPECTIONS

Under no circumstance shall a piece of equipment be removed from the RWA until it has been visually inspected and signed-off on by the onsite AMS. If the equipment is not being moved to the next phase or this is the final phase, equipment will need to remain in the area for final visual clearance. While still on the decontamination pad the excavator and heavy machinery will be cleaned by hand tools (including non-mechanical chisels, picks and scrapers) to remove any gross debris/dirt/mud then the machinery will be washed down with water and wiped free of dust and debris on all exterior surfaces including the tracks and bucket. The interior of the excavator cab will be HEPA vacuumed and wet wiped with water as part of the decontamination as well. The cleaning of the excavator, machinery and equipment must be performed on the decontamination pad, and all debris and water generated during the cleaning process be collected and properly disposed of. All equipment, tools and machinery will be visually inspected by the AMS to ensure each piece is free of mud, dust and/or debris following completion of the work and prior to leaving the RWA.

## 8 DOCUMENTATION

Daily logs of work activities will be recorded and maintained by the on-site AMS. The logs shall include air monitoring locations, TEM lab results, wind-speed records, all incidents of visible emissions, equipment utilized, work performed, problems encountered, equipment decontaminate inspections by regulators, and pertinent information regarding the project.

ESA will also prepare daily logs of all work activities, including employee training and certifications, medical records, applicable permits, notifications, variances, inspections by regulators, work performed, problems encountered, waste-disposal manifests, and any other project- relevant information.

Daily logs shall be made available to CDPHE representatives upon request.

## 9 FINAL REPORTING

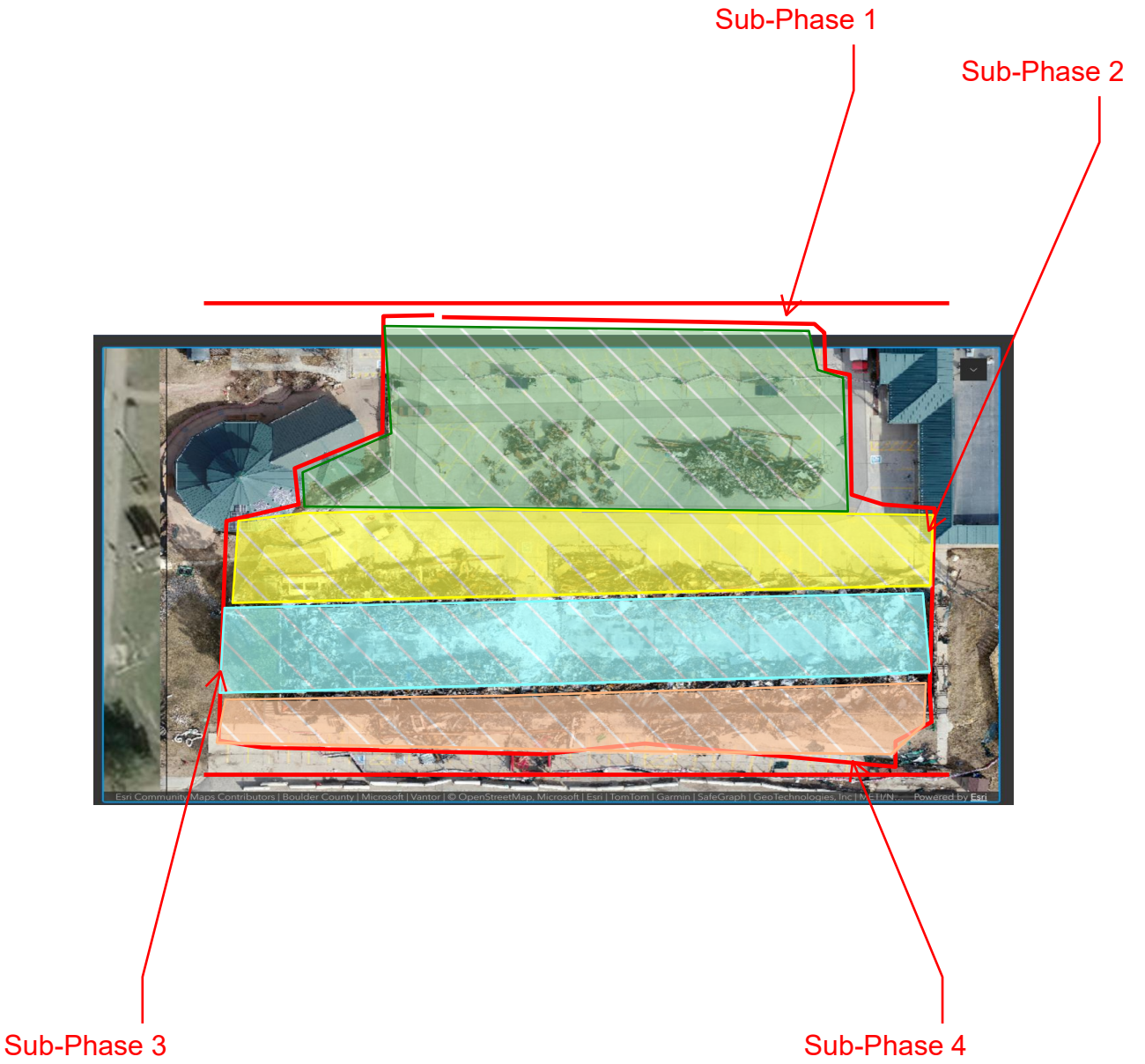
Upon completion of the debris removal project, the AMS/PM will prepare a completion report which summarizes the abatement activities which were conducted and the results of the final visual inspection. Included in this report will be a determination that the project was completed in accordance with this plan.

# EXHIBIT 1 – SITE DRAWINGS

Structures within 150' to be offered critical barriers= ✓

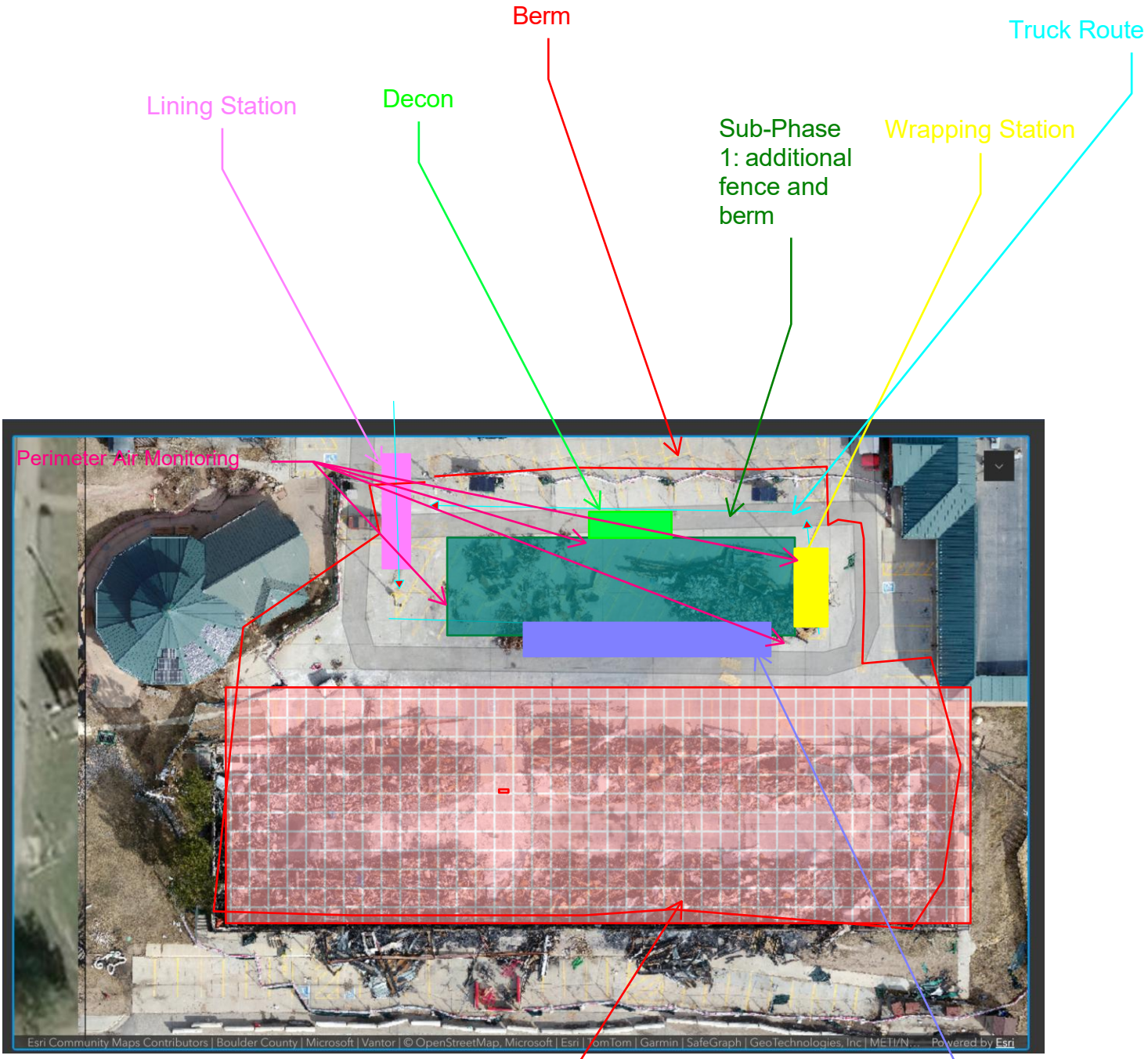



**APPROVED**
*By Curtis Burns at 12:26 pm, Apr 01, 2026*



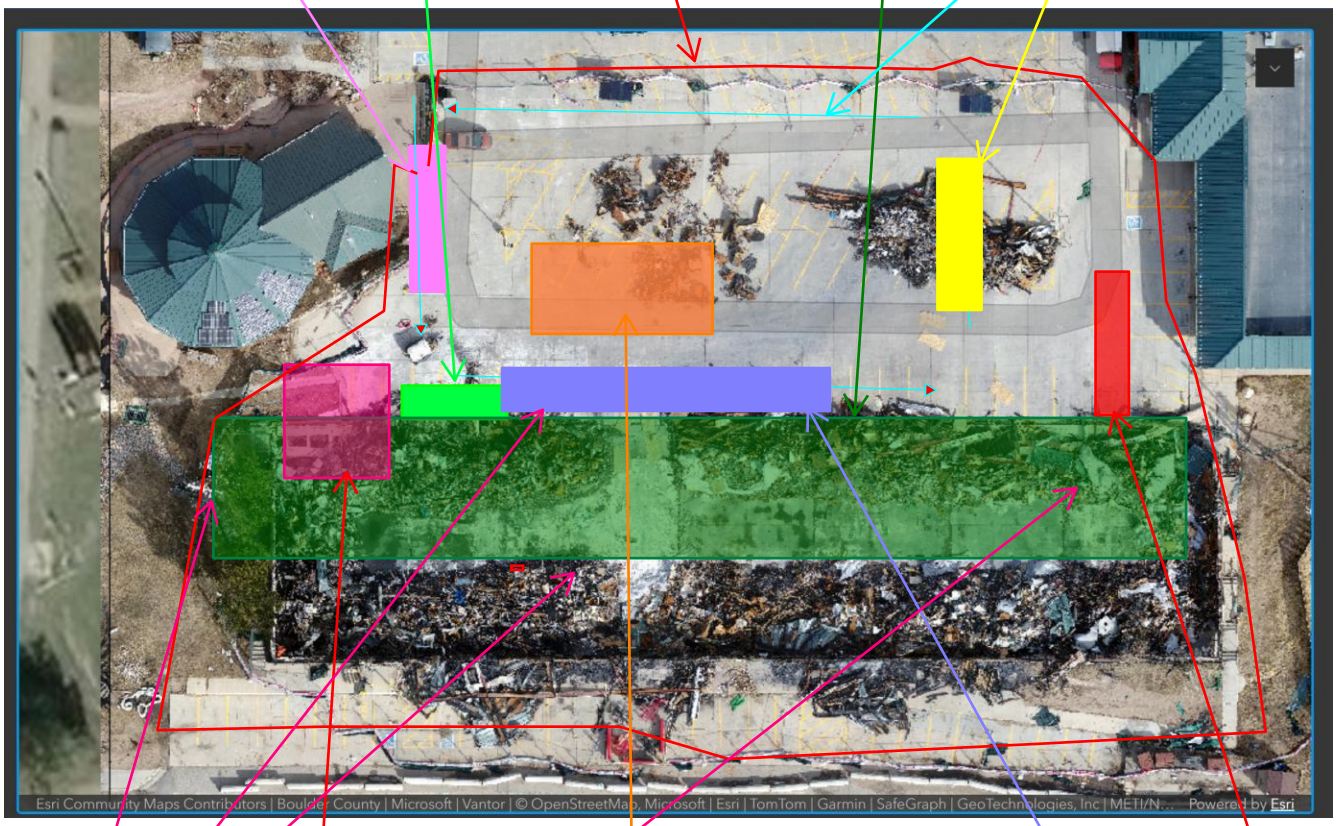



**APPROVED**
***By Curtis Burns at 12:26 pm, Apr 01, 2026***



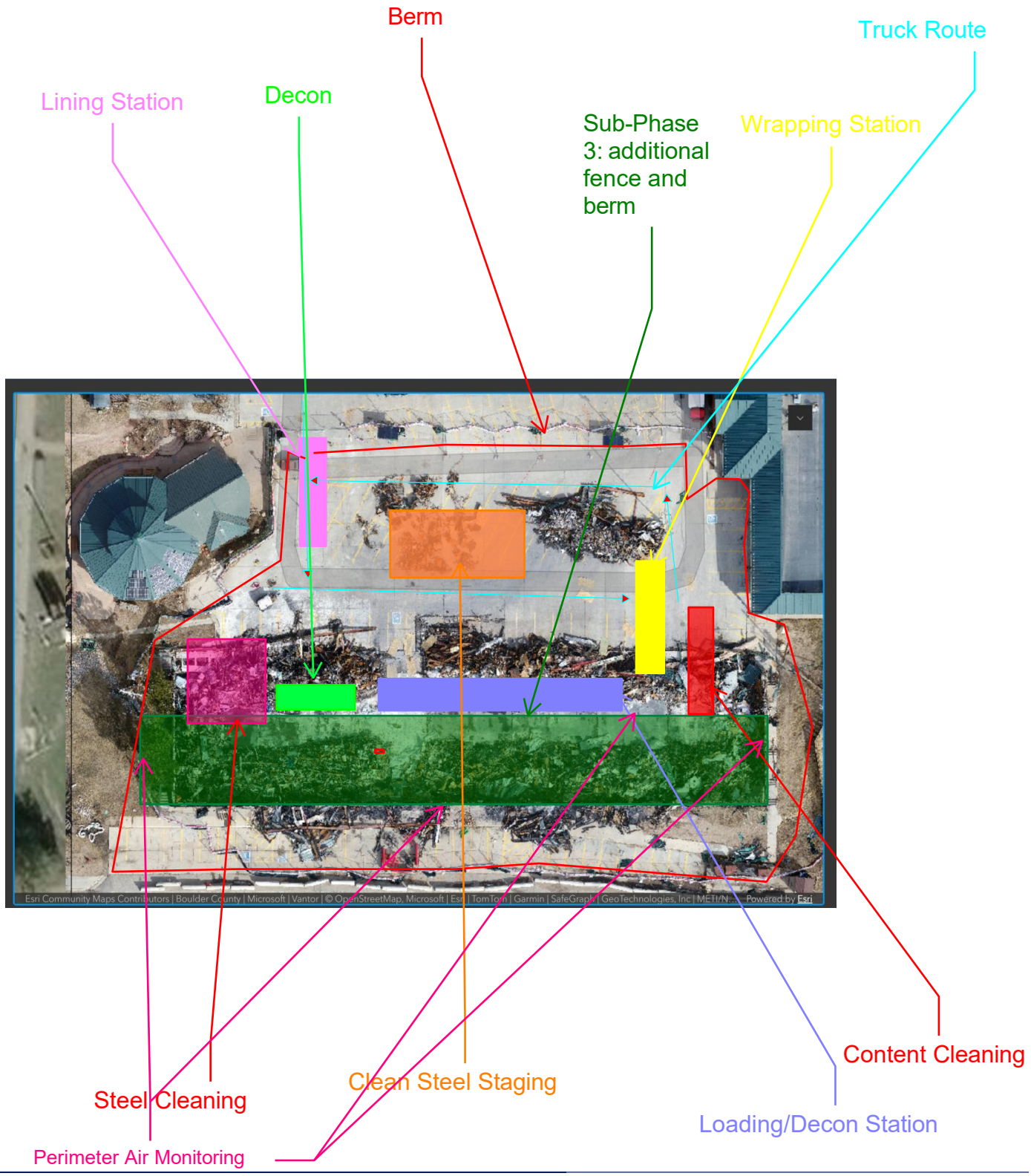



**APPROVED**
***By Curtis Burns at 12:26 pm, Apr 01, 2026***



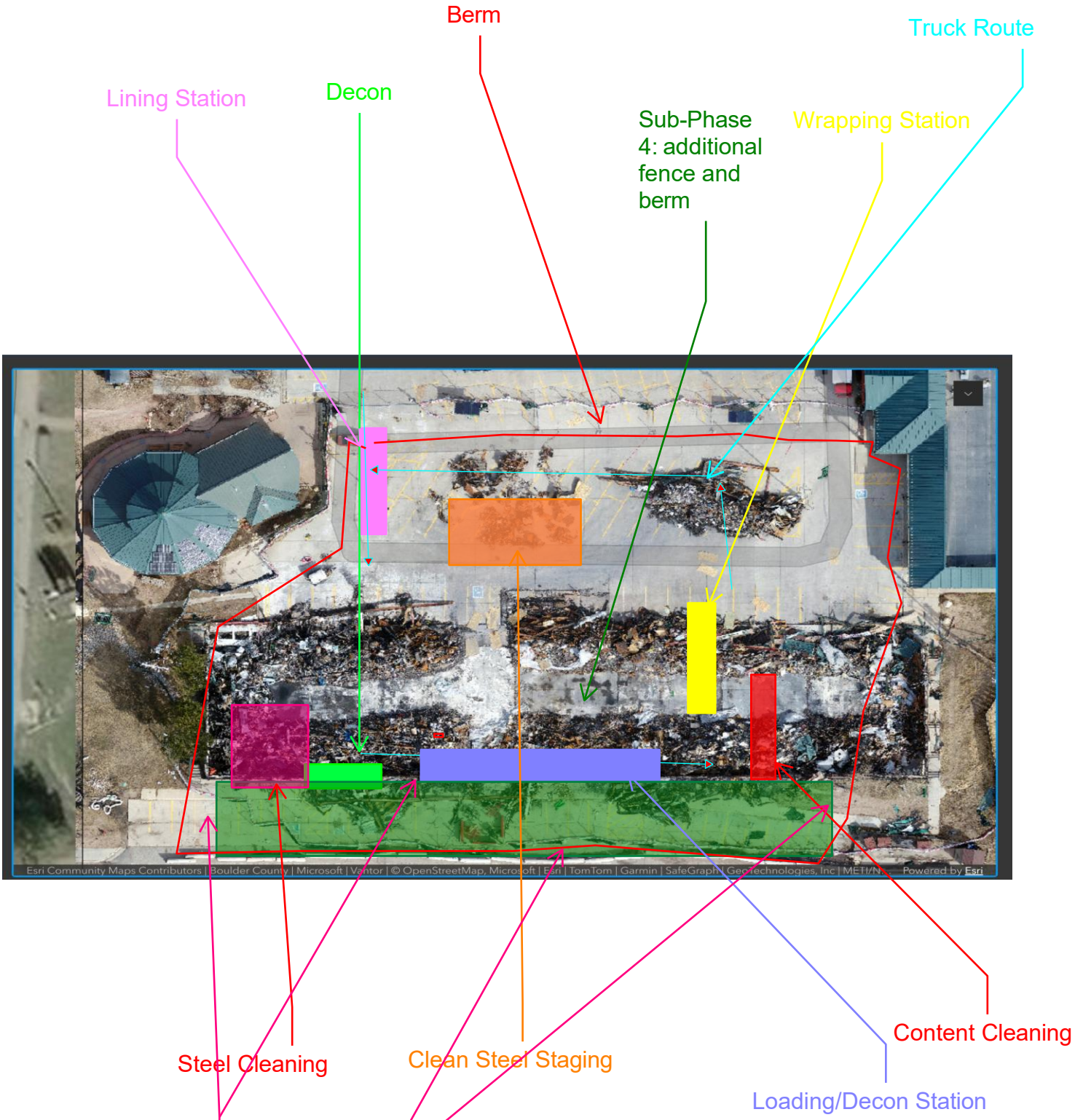



**APPROVED**
***By Curtis Burns at 12:26 pm, Apr 01, 2026***






**APPROVED**
***By Curtis Burns at 12:26 pm, Apr 01, 2026***






**APPROVED**
*By Curtis Burns at 12:26 pm, Apr 01, 2026*

# Exhibit 2- Site Photos (post stabilization)




**APPROVED**
*By Curtis Burns at 12:26 pm, Apr 01, 2026*



***APPROVED***
***By Curtis Burns at 12:26 pm, Apr 01, 2026***



***APPROVED***
***By Curtis Burns at 12:26 pm, Apr 01, 2026***



***APPROVED***
***By Curtis Burns at 12:26 pm, Apr 01, 2026***



***APPROVED***
***By Curtis Burns at 12:26 pm, Apr 01, 2026***

# Exhibit 3
# List and location of tenant contents

Ned Tenant Personal Property

March 25, 2026

| Tenant | Location on Map | Description of Potential Contents |
|---|---|---|
| Augustina's Winery | See map | Geode<br>Table, door<br>Cash box<br>Barrel racks<br>Tanks<br>Sink<br>File Cabinet<br>Toolkit<br>Dolly<br>Framed poster |
| Columbine Family Care | See map | Keys<br>Jewelry<br>Medical laser<br>Semaphores<br>Buddhas (2x)<br>Bike<br>Geode<br>Stone statues<br>Small document safes (3x) |
| Tres Gringos | Unknown | Safe<br>Patio tables (4x) |
| The Shop | See map | Metal frame dress form |
| Todasana Yoga | Unknown | Key chain<br>Small metal bowl<br>Metal chimes |
| Kaleidoscope Arts | See map | Metal sign<br>Cash box |
| Ned Bubbles (laundry) | See map | Safe<br>Change machine<br>Milwaukee tool bag<br>Coin counting machine<br>Bill counting machine<br>Headphones |
| Oneil Art | See map | Silver<br>Gold |
| Town of Ned | Unknown | Firearms |
| Wild Bear | | No response |
| Mountain Man | | No response |
| Very Nice Brewing | | No response |
| Bri Lynn Ceramics | See map | Hand made glass art<br>Melted glass |
| Picasso Hair | | No response |
| Brightwood Music | | No response |
| Matty Pizza | | No response |
| Liquor Store | See map | Safe<br>Filing cabinets (4x)<br>Computers (2x)<br>Printers (2x)<br>Bottles of liquor and wine |




**APPROVED**
**By Curtis Burns at 12:26 pm, Apr 01, 2026**




**APPROVED**
**By Curtis Burns at 12:26 pm, Apr 01, 2026**