Phase II Environmental Site Assessment

Old Winnett City Hall

116 Broadway Avenue

Winnett, Petroleum County, Montana, 59087

Superfund Technical Assessment and Response Team (START) V Contract

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PREPARED FOR

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ACRONYMS AND ABBREVIATIONS

ACM	Asbestos-containing material
AHERA	Asbestos Hazard Emergency Response Act
ARM	Administrative Rules of Montana
ATSDR	Agency for Toxic Substances and Disease Registry
bgs	Below ground surface
BER	Business environmental risk
c/m	Counts per minute
CFR	Code of Federal Regulations
DEQ	Montana Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
ESA	Environmental site assessment
GWIC	Groundwater Information Center
HUD	U.S. Department of Housing and Urban Development
IT	Information Technology
Kd	Soil-water partitioning coefficient
LBP	Lead-based paint
LF	Linear feet
mg/cm^2	Milligram per square centimeter
mg/kg	Milligrams per kilogram
µg/L	Micrograms per liter
MBMG	Montana Bureau of Mines and Geology
MCA	Montana Code Annotated
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NORM	Naturally Occurring Radioactive Materials
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated biphenyl
PLM	Polarized light microscopy
PPE	Personal protective equipment
REC	Recognized environmental condition
RSL	Regional screening level
SAP	Sampling and analysis plan
SPLP	Synthetic precipitation leaching procedure
SF	Square feet
START	Superfund Technical Assessment and Response Team
TBA	Targeted Brownfields Assessment
XRF	X-ray fluorescence

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) Region 8 tasked the Tetra Tech, Inc. (Tetra Tech) Region 8 Superfund Technical Assessment and Response Team (START) V to conduct a Targeted Brownfields Assessment (TBA) Phase II Environmental Site Assessment (ESA) at the Old Winnett City Hall (subject property) at 116 Broadway Avenue, Winnett, Petroleum County, Montana (Figure 1). Tables and figures follow the text.

1.1 SITE DESCRIPTION AND BACKGROUND

The subject property is identified as the Old Winnett Town Hall and is located in a mixed residential and commercial area in Winnett, Montana. The subject property consists of one parcel totaling 0.45 acre and two buildings, the old Winnett City Hall building and the current Winnett City Hall and Fire Department building (Figure 2). This assessment focuses only on the old City Hall building (subject property) located in the northern half of the parcel and does not include the current City Hall and Fire Department building located in the southern half of the parcel. The old City Hall building, built in 1935, was originally used by the U.S. Soil Conservation Service until it was acquired by the Town of Winnett in the mid-1950s with the stipulation that the building be used for health or education purposes. The building's exact size is currently unknown, but the footprint of the building covers approximately 800 square feet. The building is in overall poor condition because of the age of the facility and its vacancy. The roof, windows, and other exterior elements need immediate attention to prevent further deterioration.

1.1.1 Phase I ESA

In March 2025, Tetra Tech conducted a Phase I ESA on the subject property that identified the following recognized environmental conditions (REC), business environmental risks (BER), and *de minimis* conditions (Tetra Tech 2025a).

Review of historical documentation and observations made during the site reconnaissance identified the following RECs for the subject property:

- On October 30, 2019, a Brownfields Phase II ESA was completed by Tetra Tech to investigate historical underground storage tanks (UST) based on the results of a geophysical survey (Tetra Tech 2019). At the time of the Phase II ESA, soil contamination was encountered indicating that the historical UST system leaked an unknown amount of petroleum at Kozy Korner, a small bar and café which is now closed and located approximately 160 feet northwest and upgradient of the subject property. A release was reported to the Montana Department of Environmental Quality (DEQ) and added to the state's leaking underground storage tank (LUST) list as Facility ID# 32341, Release

#5380. The spill has not been reported as resolved. This facility is listed in the U.S. Brownfields database for the removal of underground storage tank piping, which required cleanup of soil contaminated with an unknown amount of petroleum products beginning on May 20, 2019. The Phase II ESA and piping removal was completed on July 1, 2019, and removal of a limited amount of soil began the same day. The associated tank closure permit was considered completed January 15, 2020. During the Phase II assessment, three test pits were completed to investigate former tank basins. Three soil borings were advanced to investigate soil impacts associated with contamination observed in the test pits. Those soil borings were completed as groundwater monitoring wells and the wells were subsequently sampled. Soil sample analytical results indicated high concentrations of both gasoline and diesel compounds in test pit samples and soil borings. Results from groundwater monitoring indicated high concentrations of gasoline compounds. Based on the established well network, groundwater appears to flow southeasterly and a dissolved-phase petroleum plume is present. The extent and magnitude of the plume is currently unknown (Tetra Tech 2019). The facility has been listed in the EPA's Facility Index System (FINDS) database as a brownfield property since August 9, 2019. Based on the upgradient location and proximity to the subject property, this facility is considered both a REC and VEC.

A review of historical documentation and observations made during site reconnaissance identified the following CREC to the subject property:

- On March 25, 1999, a UST leaked an unknown amount of an unknown substance at Winnett Tire (Facility ID # 26168, Release # 3694) at 115 North Broadway Avenue, approximately 480 feet north and upgradient of the subject property. In documents provided by Environmental Data Resources, Inc. (EDR), the release is still considered open. On March 19, 2024, Olympus Technical Services, Inc. conducted quarterly sampling of three groundwater wells on the property and no concentrations of volatile petroleum hydrocarbons were reported above the DEQ Human Health Standards (Olympus 2024). Continued monitoring of wells on and around the site at high groundwater are required to evaluate the current extent of contamination and confirm these previous results. Based on the upgradient location in relation to the subject property, Tetra Tech considers this facility a CREC; currently this facility poses little to no risk to the subject property, but regular sampling is required to maintain that status.

A review of historical documentation and observations made during site reconnaissance identified the following HRECs to the subject property:

- A facility at an unknown address located on South Broadway Avenue approximately 220 feet north and upgradient of the subject property is included in the delisted state hazardous waste sites (DEL SHWS) database. The site was listed on August 2, 1994, and was delisted on August 6, 1997. Based on the closed regulatory status given to this delisted hazardous waste site (HWS) listing, Tetra Tech does not anticipate these releases to have a negative effect on the subject property. This facility is included in the Water Quality

Association (WQA) database.

- The Petroleum County Community Center, located at 102 West Main Street approximately 320 feet northeast and cross-gradient from the subject property is listed in the U.S. Brownfields database beginning January 21, 2020, for the presence of asbestos, lead, and polychlorinated biphenyls (PCB) identified associated with building materials on the site which led to additional contamination of soil on the property. Cleanup of this contamination was completed April 7, 2020. Based on the completed status given to this brownfield site, Tetra Tech does not anticipate these releases to have a negative effect on the subject property.

- On February 22, 1999, a UST released an unknown amount of gasoline at B&D Service (Facility ID #30570, Release #3672), a gasoline service station located at 203 North Broadway Avenue, approximately 0.4 miles north and cross-gradient of the subject property. The UST release was considered resolved and given a status of “No Further Action” by the DEQ on April 9, 1999. Based on the age of the release and the fact that the DEQ considered the release resolved, Tetra Tech does not anticipate this release to have a negative effect on the subject property.

- On June 2, 1992, a UST released an unknown amount of an unreported substance at Winnett Public School located at 205 South Broadway Avenue (Facility ID #26169, Release #1221), approximately 500 feet south and cross-gradient of the subject property. The release was considered closed and resolved on July 28, 1992. Another UST release of an unknown amount of an unknown substance was reported at the school on November 29, 1995 (Facility ID #26172, Release #2821), and was considered closed and resolved on September 10, 1998. Both UST releases were given a status of “No Further Action” by the DEQ on their respective resolved dates. Based on the age of the releases and the fact that DEQ considered the releases resolved, Tetra Tech does not anticipate these releases to have a negative effect on the subject property.

- On July 2, 1991, a UST released an unknown amount of an unreported substance at Wheeler Street and Lepper Avenue (Facility ID #26171, Release #803), approximately 0.121 miles northeast and cross-gradient of the subject property. The UST release was considered resolved and given a status of “No Further Action” by the DEQ on February 24, 2000. Based on the age of the release and the fact that the DEQ considered the release resolved, Tetra Tech does not anticipate this release to have a negative effect on the subject property.

- On November 18,1991, a UST released an unknown amount of an unreported substance at Broadway Avenue and Railroad Street (Facility ID #26178, Release #1008), approximately 0.182 miles north and cross-gradient of the subject property. The UST release was considered resolved and given a status of “No Further Action” by the DEQ on January 13, 2006. Based on the age of the releases and the fact that the DEQ considered the release resolved, Tetra Tech does not anticipate this release to have a negative effect on the subject property.

- The Weowna Oil Refinery, an abandoned oil refinery located about a quarter mile east of town and 0.453 miles northeast and cross-gradient of the subject property, is listed in the State Hazardous Waste Sites (SHWS) database and is ranked as low priority. This facility is included in the DEL SHWS database and was considered delisted on March 24, 1987. The facility has been listed in the Superfund Enterprise Management System (SEMS) Archive database since January 25, 1985. It is not on the National Priorities List (NPL) and is listed with the status of no further remedial action plan (NFRAP). Based on this status and distance from the subject property, Tetra Tech does not anticipate this facility to have a negative effect on the subject property.

A review of historical documentation and observations made during the site reconnaissance identified the following BERs to the subject property:

- Given the age of the structure on the subject property, the structure may contain asbestos-containing materials (ACM). The potential presence of ACM is considered a BER.
- Given the age of the structure, the structure may contain lead-based paint (LBP). The potential presence of LBP is considered a BER.
- Severe water damage was observed throughout the structure with associated mold. The presence of mold is considered a BER.

Review of historical documentation and observations made during the site reconnaissance identified the following *de minimis* condition for the subject property:

- The presence of small quantities of household hazardous substances and petroleum products is considered a *de minimis* condition.

1.2 SCOPE OF WORK

The scope of the Phase II ESA, as defined by EPA, was to investigate the presence and extent of the BERs, and *de minimis* condition identified during the Phase I ESA. The structures on site were inspected to evaluate whether ACM, LBP, PCB-containing equipment, and mercury-containing equipment were present in building materials prior to redevelopment activities. The City of Winnett plans to redevelop the property into a new location for the police department. START V conducted the following activities at the subject property on June 17, 2025:

- Sampling of suspect building materials for ACM,
- Screening of painted surfaces using an X-ray fluorescence (XRF) analyzer to assess for LBP,
- An inventory of PCB ballasts, mercury switches, thermostats, and lights, and

- Collected four composite surface soil samples that were analyzed for total lead in dripline areas to assess for presence of lead associated with sloughing LBP.

START V's asbestos and LBP inspector for the survey was Ryan Kizer, an EPA-licensed asbestos inspector and certified lead-based paint inspector. Inspector certifications can be found in Appendix B. Ryan Kizer was the sample custodian and completed the chain-of-custody form, packaged, and shipped the samples.

START V submitted a site-specific Sampling and Analysis Plan (SAP) in support of assessment activities to EPA on May 29, 2025 (Tetra Tech 2025b). On June 5, 2025, EPA approved the SAP, before the survey began at the subject property. Field activities were performed in accordance with the SAP, except where noted in Section 2.0.

START V prepared this report in accordance with generally accepted industry practices and procedures. START V provided these services consistent with the level and skill ordinarily exercised by members of the profession currently practicing under similar conditions. This statement is in lieu of other statements either expressed or implied. The scope of services performed in execution of this evaluation may not be appropriate to satisfy the needs of other users, and use or re-use of this document, the findings, conclusions, or recommendations is at the risk of said user. This report does not warrant against future operations or conditions that may not be consistent with its recommendations.

Section 2.0 specifies field and analytical protocols and conveys assumptions and deviations. Section 3.0 presents analytical results. Section 4.0 presents conclusions and offers recommendations based on assessment findings. Section 5.0 lists sources referenced during development of this report.

2.0 SAMPLING

START V conducted the Phase II ESA field investigation at the subject property in June 2025. During the Phase II ESA, START conducted hazardous material assessments and drip line soil sampling. The Phase II ESA investigative methodology is described in the following sections. Appendix A contains photographs taken during the survey.

2.1 HAZARDOUS MATERIALS SURVEY

2.1.1 ACM Sampling

START V collected suspect ACM samples on the subject property on June 17, 2025. The purpose of the asbestos survey was to evaluate the subject property buildings for the presence, quantity, locations, and characterization of ACM that may require abatement prior to renovation or demolition activities in accordance with the Asbestos Hazard Emergency Response Act (AHERA) and National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations (AHERA 1986), as adopted by EPA. The intent of the asbestos NESHAP regulations is to protect the public and workers by minimizing release of asbestos fibers during activities involving processing, handling, and disposing of ACM. According to the Agency for Toxic Substances and Disease Registry (ATSDR), inhaling asbestos fibers can cause cancer and other lung diseases (ATSDR 2016). The survey accorded with industry standard practice for hazardous materials surveys. The collection of suspected ACM samples accorded with NESHAP regulations as adopted by EPA.

2.1.1.1 Field Survey and Analytical Protocols

START V made every effort to inspect all areas of the subject property building. Minor demolition of materials (destructive sampling) was required during the survey effort. The collection of suspect ACM samples accorded with NESHAP, as adopted by EPA, and AHERA protocols. AHERA defines “asbestos-containing material” as any material or product that contains more than 1 percent asbestos (AHERA 1986). Suspected ACMs were grouped as homogeneous areas if the material was similar in appearance and texture; however, if the inspector decided a material (for example, wall texturing) was not similar in appearance and texture to other materials in the subject property building, the inspector distinguished the material as unique and collected samples of each unique material accordingly.

START V collected bulk samples of suspected ACM to confirm that each distinct layer of material was represented in the sample. A wetting agent was applied to friable surfaces prior to sample collection to reduce the potential for fiber release. All samples collected were placed in

plastic bags, labeled, and sealed immediately upon collection. A unique sample identification number was assigned to each sample. The sampling instruments were wiped clean using a wet, lint-free cloth after collecting each sample to minimize potential cross-contamination between samples.

The bulk samples of suspected ACM remained in the inspector's custody until they were sent to the laboratory. Upon completion of sampling activities, the samples were sent, along with START V's chain-of-custody documentation, to Eurofins Built Environmental Testing West, LLC for analysis per EPA Method 600/R-93/116 via polarized light microscopy (PLM*).* Eurofins is a National Voluntary Laboratory Accreditation Program-certified laboratory. Section 3.1.1 summarizes ACM analytical results. Sample locations are depicted in Figure 3.

2.1.1.2 Assumptions and Deviations

START V inspected the interior and exterior of the subject property buildings for suspected ACM. Because of limitations on destructive sampling methods, additional suspect materials may be present but not detected in walls, voids, or other concealed areas. The attic area was inaccessible for a complete assessment of that space; however, insulation was obtained through a hole in the ceiling for analysis.

2.1.2 LBP Screening

LBP screening was conducted at the subject property On June 17, 2025. START V conducted a screening to assess the presence, quantity, and locations of LBP exceeding lead hazard levels which would require Occupational Safety and Health Administration (OSHA) worker safety precautions during development activities. The LBP screening proceeded according to protocols similar to the single-family housing inspection procedures in U.S. Department of Housing and Urban Development (HUD) guidelines (HUD 2012). EPA and HUD define LBP as any surface coating that contains at least 1.0 milligram per square centimeter (mg/cm^2) or 0.5 percent lead by weight. START V conducted a screening of paint-covered interior and exterior surfaces using a SciAps X-550 XRF spectrometer.

2.1.2.1 Field Survey and Analytical Protocols

START V made every effort to inspect all interior and exterior areas of the subject property structure. The subject property building was constructed in approximately 1935, and HUD (2012) *Guidelines for the Evaluation and Control of LBP in Housing* suggest that paint applied before or during 1978 could contain lead.

The SciAps X-550 is an XRF spectrum analyzing system for quantitative measurement of lead in paint on various substrates. The SciAps X-550 XRF unit has a HUD-compliant Performance

Characteristic Sheet; therefore, the LBP screening results are considered HUD-compliant for residential housing or child-occupied facilities. START V performed XRF screening of painted surfaces that could be impacted during renovation or demolition activities.

START V used the XRF "lead paint mode" for testing, standardized per the equipment instruction manual, and programmed the unit with an action level of 1.0 milligrams per square centimeter (mg/cm^2). The Housing and Community Development Act of 1987 (Public Law 100-242) considers LBP to be paint containing greater than or equal to 1.0 mg/cm^2 lead by XRF testing or 1.0 mg/cm^2 lead by laboratory analysis.

START V conducted XRF calibration checks on the SciAps X-550 spectrometer according to the SciAps recommended protocol and HUD guidelines. These quality control readings were used to monitor the performance of the SciAps X-550 spectrometer. Calibration check readings were taken at the beginning and end of operation and every 4 hours during operation from a standard reference material (mounted on a wood block) that is provided with the SciAps X-550 XRF instrument. Section 3.1.2 summarizes the XRF screening results of painted surfaces at the subject property. Locations of LBP readings are depicted in Figure 5.

2.1.2.2 Assumptions and Deviations

START V inspected the exterior and interior of the subject property buildings for LBP. START V was able to access and sample all accessible surfaces for LBP. During the assessment of the buildings several painted surfaces were encountered that were identical to other paint colors, substrates, or components that tested positive for lead. These surfaces were assumed to be positive.

2.1.3 Other Hazardous Materials Inventory

As part of the other hazardous materials assessment, START V completed an inventory of potential PCB- and mercury-containing equipment observed on the subject property. START V inspected the building at the subject property and noted observed PCB- or mercury-containing building components on field sheets. START V made every effort to provide a complete inventory of these items; however, START V cannot guarantee an accounting of every item. A summary of the potential PCB- or mercury-containing materials inventoried during the assessment is in Section 3.1.3.

2.1.3.1 Assumptions and Deviations

START V inspected the exterior and interior of the subject property building for other hazardous materials. START V was able to investigate all accessible areas for hazardous materials. Although START V dismantled all fixtures with variations in make and model to inspect for

hazardous materials, most fixtures were left intact and assumed to be either positive or negative for hazardous materials based on initial observation of the dismantled unit.

2.2 SOIL SAMPLING

START V collected composite surface soil samples on the subject property on June 17, 2025. Surface soil sample locations are depicted on Figure 3.

2.2.1 Field Survey and Analytical Protocols

START V collected 5-point composite soil samples from four transects around the subject property building in drip line areas. Composite surface soil samples were collected across each transect at 5 equally spaced sample locations from 0 to 6 inches below ground surface (bgs). Sub-samples were transferred to a decontaminated stainless-steel container with a plastic disposable scoop and mixed until the soil consistency became homogeneous. Each composite sample was placed in a labeled laboratory-supplied 8-ounce glass container and submitted for laboratory analysis of total lead by EPA method 6020. The laboratory dried and passed the samples through a No. 100 mesh sieve before analysis. For quality control, one field duplicate sample was collected.

Overall, START V collected four investigative composite surface soil samples and one duplicate soil sample. All samples were uniquely identified, labeled, and stored on ice and remained in the sampler's custody until they were sent to the laboratory. Upon completion of sampling activities, soil samples were shipped, along with START V's chain-of-custody documentation, via FedEx ground to Merit Laboratories, Inc. in East Lansing, Michigan on June 20, 2025. All surface soil samples were analyzed for total lead to assess the presence of lead associated with sloughing LBP.

Section 3.2 summarizes soil sampling analytical results. The final sampling locations are identified in Figure 3. Appendix E presents soil sample analytical results and chain-of-custody forms for the samples, as well as the data validation report.

2.2.2 Assumptions and Deviations

Soil sampling is only necessary in areas where soil is adjacent to painted surfaces that have tested positive for LBP and that are within dripline areas where sloughing of LBP poses a contamination risk. Based on elevated XRF readings on all external walls of the building, START assumed lead impacted soil would require sampling on all four sides of the building. START also assumed based on the highest LBP readings observed on the south side of the

building, that the corresponding soil sample would contain the highest concentrations of lead and therefore, this sample (OWCH-02-SO-C5-00-06-20250617) was chosen for field duplicate collection and QA/QC analysis.

3.0 FINDINGS AND RESULTS

A START V data validator performed a Stage 1 verification of the analytical reports according to Tetra Tech's Standard Operating Procedure 203-2, "Laboratory Analytical Data Verification" (Tetra Tech 2021). The data verification reports are included in the relevant appendices with the analytical reports. Based on results of the data verification, all data were considered usable.

3.1 HAZARDOUS MATERIALS SURVEY

3.1.1 ACM

Analytical results for samples collected from the property are summarized in Table 1. Sample locations are depicted in Figure 4.

Analytical results indicate that the following materials contained asbestos detected at a concentration greater than 1 percent:

- Tan Caulk (represented by samples WC-1-CK01-A, B, C) observed on the south side of the building around a window containing 5% chrysotile asbestos totaling 3 linear feet.
- The beige texture and beige joint compound (represented by samples WC-1-DWJC02-A, B, C) observed in the office bathroom contained 2% chrysotile asbestos totaling 160 square feet.

Appendix C presents the analytical report for PLM results from samples of suspected ACM collected at the building on the subject property, chain-of-custody documentation, and the data validation report. Quantities of each asbestos-tested homogeneous area are tabulated in square feet (SF) based on the type of associated material.

3.1.2 LBP

LBP was detected on the exterior and interior walls of the old City Hall building in several locations. Of the 41 painted surfaces identified throughout the building, 20 surfaces produced XRF readings greater than or equal to 1.0 mg/cm^2. Of these positive readings, 6 surfaces were throughout the interior and 14 surfaces were on the exterior of the building. Review of LBP readings showed levels between 0 mg/cm^2 and 7.8 mg/cm^2 throughout the interior and exterior of the building. LBP was determined to be most prevalent on the gray paint on the exterior of the building including the siding, Window trim, soffit, and drip edge, which is painted over with white paint in most areas. In the interior of the building, LBP was most prevalent on doors and door jams when present.

Table 2 summarizes LBP screening results for measurements completed throughout the interior and exterior of the building. Bolded results indicate where LBP was detected at a concentration equal to or greater than the Housing and Community Development Act of 1987 (Public Law 100-242) definition of LBP (greater than or equal to 1.0 mg/cm^2).

3.1.3 Other Hazardous Materials

A visual inspection of additional hazardous materials was carried out at the subject property. START V did not identify any bulbs, ballasts, switches, thermostats, or any other appliances that contained mercury, freon, PCBs, or other hazardous materials. Various household chemicals and cleaning products were identified in the janitorial closet, but these materials represent a *de minimis* condition.

3.2 SOIL

START V detected LBP on the exterior walls of the subject property buildings and collected four composite samples from the drip lines: OWCH-01-SO-C5-00-06-20250617, OWCH-02-SO-C5-00-06-20250617, OWCH-03-SO-C5-00-06-20250617, and OWCH-04-SO-C5-00-06-20250617, plus one duplicate sample, OWCH-02-SO-C5-00-06-20250617-DUP. Composite surface soil samples were analyzed for total lead in dripline areas to assess the presence of lead associated with sloughing LBP. Soil sample results were validated and qualified, if necessary. Appendix D includes the analytical results from soil samples, chain-of-custody documentation, and data validation forms.

A summary of lead found in drip line soil is provided below:

- Total lead concentration associated with sample OWCH-01-SO-C5-00-06-20250617 is 704 mg/kg.
- Total lead concentration associated with sample OWCH-02-SO-C5-00-06-20250617 is 2,040 mg/kg.
- Total lead concentration associated with sample OWCH-02-SO-C5-00-06-20250617-DUP is 2,230 mg/kg.
- Total lead concentration associated with sample OWCH-03-SO-C5-00-06-20250617 is 743 mg/kg.
- Total lead concentration associated with sample OWCH-04-SO-C5-00-06-20250617 is 222 mg/kg.

Table 3 summarizes the lead contaminated soil screening results of dripline soils on the subject property. Figure 3 depicts soil sampling locations. Bolded results in the table indicate where lead was detected at a concentration greater than the leaching to groundwater screening level of 90 mg/kg and the direct contact residential screening level (DEQ 2024). A red bolded result indicates a concentration in exceedance of the industrial direct contact screening level (EPA 2024).

4.0 CONCLUSIONS AND RECOMMENDATIONS

The following conclusions and recommendations are based on observations during the survey and analytical results from samples collected at the subject property. START V recommends that results be discussed with DEQ's Brownfields program to evaluate which site-specific cleanup procedures, in accordance with Montana Laws and Rules, are required before redeveloping the site.

4.1 HAZARDOUS MATERIALS SURVEY

4.1.1 Asbestos Containing Material

Review of ACM data indicates that ACM at or above the regulatory standard of 1% asbestos was found in only two homogenous areas, the window with tan caulking along the south side of the building and beige wall texture and joint compound observed in the office bathroom. No other ACM was identified in the accessible areas of the interior or exterior of the building.

Though other presumed materials were non-detect for asbestos, ACM is still present at the subject property, and management strategies and adherence to asbestos regulations are required to mitigate risks associated with ACM exposure.

All ACM should be removed by a licensed asbestos abatement contractor before renovation or demolition work disturbs the material. The removed waste must be disposed of in accordance with state and local regulations.

The removal and disposal of ACM are regulated under NESHAP in 40 Code of Federal Regulations (CFR) Part 61; Administrative Rules of Montana (ARM) 17.74, Subchapter 3: Asbestos Control; and Montana Code Annotated (MCA) Title 75, Part 5. Worker exposure to asbestos during construction operations, including ACM removal, is regulated under 29 CFR 1926.1101. OSHA has established worker protection measures for the removal of asbestos from facilities, including training and medical monitoring requirements for personnel engaging in the oversight and removal of ACM, exposure limits, respiratory protection, personal protective equipment (PPE) levels, safe work practices and engineering controls, and storage of wastes.

Any contractor preparing to bid or perform work on the subject property should be informed of the presence of ACM. Contractors should also be informed of compliance requirements under state and federal regulations. Following asbestos abatement, a visual inspection and asbestos air clearance should be conducted, as required by ARM 17.74.357.

This report is intended to provide information concerning the types of hazardous materials that may be present in the subject property building and includes only those materials that were visible and accessible at the time of the inspection. If additional suspect materials are identified during any future demolition activities that were not sampled as a part of this asbestos survey, additional sampling will be required to confirm that the suspect material is not ACM. If any ACM is encountered during demolition, it should be removed or encapsulated by a licensed asbestos abatement contractor before renovation or demolition work disturbs the material.

4.1.2 Lead Based Paint

LBP was detected on the exterior and interior walls of the building and the exterior walls of the building in several locations. There are no discernable patterns identified regarding painted surfaces that were determined positive for LBP, and a variety of paint colors, substrates, and building components are associated with positive readings.

HUD defines LBP as paint with lead levels above 1.0 mg/cm^2. If LBP surfaces are impacted during renovation or demolition, START V recommends that the contractor conducting the renovation or demolition comply with OSHA Lead in Construction Standard, 29 CFR, 1926.62. LBP debris should be characterized and disposed of in accordance with state and local regulations.

LBP surfaces are classified as either damaged or not damaged material in Table 2. The extent of damage is assessed in order to determine whether a surface can be encapsulated (applies to non-damaged surfaces) or needs to be stripped (applies to damaged surfaces) during removal. Of the 20 surfaces that were determined positive or assumed positive for LBP, 17 of these surfaces were determined to be damaged. The lead positive surfaces appearing undamaged that would only require encapsulation include the white exterior wall C siding and the off-white door and door jamb associated with wall C of the main room. All other positive painted surface will require stripping, or the associated building material will require complete removal prior to renovation.

In Montana, the removal of LBP is regulated under 29 CFR 1926.62. OSHA provisions for removing LBP from the workplace include training requirements for personnel engaging in the oversight and removal of LBP, exposure limits, respiratory protection, PPE, safe work practices and engineering controls, and storage of wastes.

OSHA regulations pertaining to the disturbance of paint with any concentration of lead require that safe work practices be used to reduce exposure to harmful levels of lead regardless of the

work being performed. Safe work practices may include the use of PPE (respiratory protection, disposable coveralls, and eye protection), initial exposure assessment, and the use of wet methods.

Given the presence of LBP associated with the subject property, START V recommends that renovation activities involving any painted surfaces be conducted by a contractor who has received a minimum certification of OSHA Lead in Construction Training (commonly referred to as OSHA Lead Awareness Training). START V also recommends that any contractor preparing to bid on or perform work on the subject property should be informed of the presence of LBP on the subject property building, and demolition activities involving any painted surfaces be conducted by a contractor who has received a minimum certification of OSHA Lead Awareness Training. START V recommends that the contractor conducting the renovation or demolition comply with OSHA Lead in Construction Standard, 29 CFR 1926.62. LBP debris should be characterized and disposed of in accordance with state and local regulations.

4.1.3 Other Hazardous Materials

Upon inspection, electrical devices, light fixtures, and switches throughout the building were determined not to contain any quantities of PCBs or mercury. Therefore, specialized disposal of these components is not recommended.

Various household chemicals and cleaning products were identified in the janitorial closet, but these materials represent a *de minimis* condition.

4.2 SOIL

Lead concentrations exceed the EPA direct contact residential regional screening level (RSL) of 200 mg/kg in all samples collected. Samples OWCH-02-SO-C5-00-06-20250617 and OWCH-02-SO-C5-00-06-20250617-DUP exceed the EPA industrial direct contact RSL of 800 mg/kg (EPA 2024). As such, lead impacted dripline soils adjacent to the building constitute an exposure pathway and a health threat to future occupancy. Therefore, START V recommends removal of shallow surface soils to one foot below ground surface around the building footprint with cleanup confirmation sampling of excavation basins and sidewalls. It is also important to note that DEQ's leaching screening level for lead is 90 mg/kg, which has been exceeded by all soil samples. As the leaching pathway has not been investigated through this assessment, START V recommends either obtaining a vertical profile of surface and subsurface soil samples with lead analyses, completing in-situ groundwater sampling, or completing synthetic precipitation leaching procedure sampling to determine if the lead leaching to groundwater

pathway is complete. Additionally, given the presence of lead associated with the subject property, START V recommends the renovation activities involving the soil adjacent to the building be conducted by a contractor who has received a minimum certification of OSHA Lead Awareness Training.

START V also recommends that any contractor preparing to bid on or perform work on the subject property should be informed of the presence of lead in the soil and building, and demolition activities involving the soil adjacent to the building be conducted by a contractor who has received a minimum certification of OSHA Lead Awareness Training. START V recommends soil removal and cleanup confirmation sampling and recommends that the contractor conducting the excavation coordinate cleanup activities and cleanup confirmation sampling with DEQ's Brownfields staff. Lead contaminated soils should be characterized and disposed of in accordance with state and local regulations.

5.0 REFERENCES

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EPA. 2024. “Regional Screening Levels (RSLs) – Generic Tables.” November. https://www.epa.gov/risk/regional-screening-levels-rsls-generic-tables.

TABLES

Table 1: Summary of ACM Analytical Results

Table 1: Summary of Asbestos Analytical Results for Old Winnett City Hall					
Map ID	**Sample ID**	**Material Description**	**Material Locations**	**Analytical Results (% asbestos)**	**Quantity (sqft)**
1	WC-1-BM01-A	Red Brick	Front Entryway Steps	ND	30
		Gray Mortar		ND	30
2	WC-1-BM01-B	Red Brick	Front Entryway Steps	ND	30
		Gray Mortar		ND	30
3	WC-1-BM01-C	Red Brick	Front Entryway Steps	ND	30
		Gray Mortar		ND	30
4	WC-1-CON01-A	Gray Concrete	Front Entryway Steps	ND	15
5	WC-1-CON01-B	Gray Concrete	Front Entryway Steps	ND	15
6	WC-1-CON01-C	Gray Concrete	Front Entryway Steps	ND	15
7	WC-1-CON02-A	Gray Concrete	Foundation Concrete	ND	600
8	WC-1-CON02-B	Gray Concrete	Foundation Concrete	ND	600
9	WC-1-CON02-C	Gray Concrete	Foundation Concrete	ND	600
10	**WC-1-CK01-A**	**Tan Caulk**	**Window Caulk exterior**	**5% Chrysotile**	**3**
11	**WC-1-CK01-B**	**Tan Caulk**	**Window Caulk exterior**	**5% Chrysotile**	**3**
12	**WC-1-CK01-C**	**Tan Caulk**	**Window Caulk exterior**	**5% Chrysotile**	**3**
13	WC-1-CON03-A	Biege Concrete	East side of building exterior	ND	50
14	WC-1-CON03-B	Biege Concrete	East side of building exterior	ND	50
15	WC-1-CON03-C	Biege Concrete	East side of building exterior	ND	50
16	WC-1-CP01-A	Green Carpet	Entryway	ND	30

Table 1: Summary of Asbestos Analytical Results for Old Winnett City Hall					
Map ID	**Sample ID**	**Material Description**	**Material Locations**	**Analytical Results (% asbestos)**	**Quantity (sqft)**
17	WC-1-CP01-B	Green Carpet	Entryway	ND	30
18	WC-1-CP01-C	Green Carpet	Entryway	ND	30
19	WC-1-DWJC01-A	Off-White Texture	Entryway	ND	100
		Cream Tape		ND	100
		Off-White Joint Compound		ND	100
		Off-White Drywall with Brown Paper		ND	100
20	WC-1-DWJC01-B	Off-White Joint Compound	Entryway	ND	100
		Off-White Drywall with Brown Paper		ND	100
21	WC-1-DWJC01-C	Off-White Texture	Entryway	ND	100
		Cream Tape		ND	100
		Off-White Joint Compound		ND	100
		Off-White Drywall with Brown Paper		ND	100
22	WC-1-WPL01-A	Brown Wall Panel	Main Room	ND	550
23	WC-1-WPL01-B	Brown Wall Panel	Main Room	ND	550
24	WC-1-WPL01-C	Brown Wall Panel	Main Room	ND	550
25	WC-1-DW01-A	Off-White Drywall with Brown Paper	Main Room Under Wall Panel	ND	550
26	WC-1-DW01-B	Off-White Drywall with Brown Paper	Main Room Under Wall Panel	ND	550
27	WC-1-DW01-C	Off-White Drywall with Brown Paper	Main Room Under Wall Panel	ND	550
28	WC-1-INS01-A	Gray /Blown in Insulation	Main Room Attic	ND	300
29	WC-1-INS01-B	Gray /Blown in Insulation	Main Room Attic	ND	300
30	WC-1-INS01-C	Gray /Blown in Insulation	Main Room Attic	ND	300

Table 1: Summary of Asbestos Analytical Results for Old Winnett City Hall					
Map ID	**Sample ID**	**Material Description**	**Material Locations**	**Analytical Results (% asbestos)**	**Quantity (sqft)**
31	WC-1-PB01-A	Off-White Painted Tan Particle Board	Main Room Ceiling	ND	300
32	WC-1-PB01-B	Off-White Painted Tan Particle Board	Main Room Ceiling	ND	300
33	WC-1-PB01-C	Off-White Painted Tan Particle Board	Main Room Ceiling	ND	300
34	WC-1-PB02-A	Off-White Painted Tan Particle Board	Office walls and ceiling	ND	100
35	WC-1-PB02-B	Off-White Painted Tan Particle Board	Office walls and ceiling	ND	100
36	WC-1-PB02-C	Off-White Painted Tan Particle Board	Office walls and ceiling	ND	100
37	**WC-1-DWJC02-A**	**Beige Texture**	**Bathroom in Office**	**2% Chrysotile**	**160**
		Cream Tape		ND	160
		Beige Joint Compound		**2% Chrysotile**	**160**
		Off-White Drywall with Brown Paper		ND	160
38	**WC-1-DWJC02-B**	**Beige Texture**	**Bathroom in Office**	**2% Chrysotile**	**160**
		Cream Tape		ND	160
		Beige Joint Compound		**2% Chrysotile**	**160**
		Off-White Drywall with Brown Paper		ND	160
39	**WC-1-DWJC02-C**	**Beige Joint Compound**	**Bathroom in Office**	**2% Chrysotile**	**160**
		Off-White Drywall with Brown Paper		ND	160
40	WC-1-CT01-A	Brown Ceiling Tile with White Surface	Bathroom in Office	ND	30
41	WC-1-CT01-B	Brown Ceiling Tile with White Surface	Bathroom in Office	ND	30
42	WC-1-CT01-C	Brown Ceiling Tile with White Surface	Bathroom in Office	ND	30
43	WC-1-INS02-A	Pink Insulation	Basement Ceiling	ND	300
		Brown Paper		ND	300

Table 1: Summary of Asbestos Analytical Results for Old Winnett City Hall					
Map ID	**Sample ID**	**Material Description**	**Material Locations**	**Analytical Results (% asbestos)**	**Quantity (sqft)**
44	WC-1-INS02-B	Pink Insulation	Basement Ceiling	ND	300
		Brown Paper		ND	300
45	WC-1-INS02-C	Pink Insulation	Basement Ceiling	ND	300
		Brown Paper		ND	300

Notes:
LF Lineal Feet
ND Non-detect (sample is below reporting limit)
Sqft Square feet
% percent

Table 2: Summary of Lead-Based Paint Screening Results

TABLE 2: LEAD BASED PAINT RESULTS - Old Winnett City Hall						
XRF Screening No.	**Paint Color**	**Location**	**Component**	**Substrate**	**XRF Reading (mg/cm^2)**	**Damaged (Yes/No)**
1	Test				0.94	PASS
2	Test				0.92	PASS
3	Test				0.93	PASS
4	White	Exterior Wall D	Siding	Wood	0.06	Yes
5	White	Exterior Wall C	Siding	Wood	0.55	No
6	Gray Green	Exterior Wall C	Trim	Wood	0.10	Yes
7	White	Exterior Wall C	Door Jam	Wood	0.07	Yes
8	Gray/Green	Exterior Wall C	Door	Wood	0.32	Yes
9	Gray	Exterior Wall C	Door Trim	Wood	0.17	Yes
10	**White**	**Exterior Wall C**	**Soffitt**	**Wood**	**2.73**	**Yes**
11	**Off-White**	**Exterior Wall C**	**Siding**	**Wood**	**5.51**	**Yes**
12	White	Exterior Wall D	Siding	Wood	0.05	Yes
13	**White**	**Exterior Wall C**	**Siding**	**Wood**	**4.01**	**No**
14	**Gray**	**Exterior Wall C**	**Drip Edge**	**Wood**	**2.02**	**Yes**
15	**Gray**	**Exterior Wall C**	**Window Trim**	**Wood**	**1.44**	**Yes**
16	**Gray**	**Exterior Wall C**	**Window**	**Wood**	**4.71**	**Yes**
17	Gray	Exterior Wall C	Door Trim	Wood	0.02	Yes
18	White	Exterior Wall C	Door	Wood	0.00	Yes
19	White	Exterior Wall B	Siding	Wood	0.78	Yes

20	**Off-White**	**Exterior Wall B**	**Siding**	**Wood**	**4.87**	**Yes**
21	**White**	**Exterior Wall A**	**Siding**	**Wood**	**7.80**	**Yes**
22	**White**	**Exterior Wall D**	**Siding**	**Wood**	**1.05**	**Yes**
23	**White**	**Exterior Wall A**	**Siding**	**Wood**	**6.28**	**Yes**
24	**White**	**Exterior Wall A**	**Siding**	**Wood**	**1.56**	**Yes**
25	**Brown/Gray/Green**	**Exterior Wall A**	**Siding Trim**	**Wood**	**1.79**	**Yes**
26	**White**	**Exterior Wall C**	**Entryway Door trim**	**Wood**	**2.64**	**Yes**
27	**White**	**Exterior Wall C**	**Entryway Door**	**Wood**	**3.08**	**Yes**
28	Yellow	Entryway	Wall C	Drywall	0.02	No
29	Yellow	Entryway	Wall A	Drywall	0.00	No
30	White	Entryway Wall A	Window Trim	Wood	0.00	Yes
31	White	Entryway Wall A	Window	Wood	0.00	Yes
32	Off-White	Main Room	Ceiling	Particle Board	0.01	Yes
33	Pink	Doorway to Office	Door Trim	Wood	0.83	Yes
34	Pink	Doorway to Office	Door	Wood	0.88	Yes
35	Pink	Office	Wall B	Particle Board	0.02	Yes
36	Pink	Office	Wall A	Particle Board	0.00	Yes
37	Off-White	Bathroom	Wall A	Drywall	0.00	Yes
38	Off-White	Bathroom	Wall D	Drywall	0.00	Yes
39	**Off-White**	**Main Room Wall C**	**Door**	**Wood**	**2.92**	**No**
40	**Off-White**	**Main room Wall C**	**Door Jam**	**Wood**	**1.92**	**No**

41	**Off-White**	**Entryway 2 Wall A**	**Siding**	**Wood**	**6.82**	**Yes**
42	**Gray**	**Basement**	**Door Jam**	**Wood**	**2.06**	**Yes**
43	Gray	Basement	Door	Wood	0.58	Yes
44	**Gray**	**Basement Bathroom Stall**	**Stall Wall**	**Wood**	**1.03**	**Yes**
45	**Gray**	**Coal Room doorway**	**Door**	**Wood**	**1.60**	**Yes**
46	Test				0.93	PASS
47	Test				0.94	PASS
48	Test				0.96	PASS

Notes:

Mg/cm^2	milligrams per square centimeter
XRF	X-ray Fluorescence

Table 3: Summary of Soil Analytical Results

TABLE 3: SUMMARY OF SOIL ANALYTICAL RESULTS

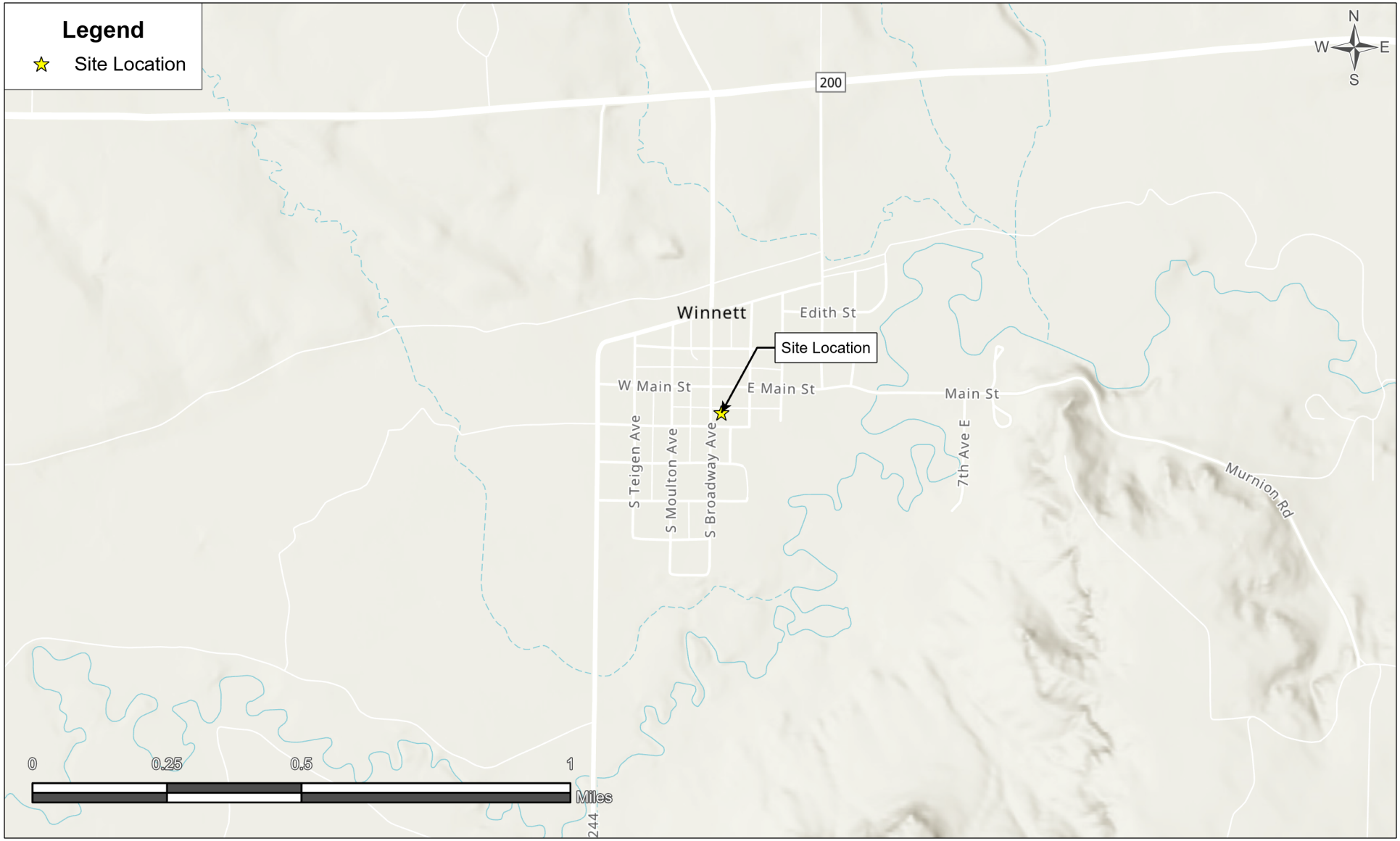
Old Winnett City Hall Soil Samples, 0 to 6 inches bgs					
Sample ID	EPA Residential RSL (mg/kg)	EPA Industrial RSL (mg/kg)	DEQ Leaching Screening Level	Total Lead (mg/kg)	Soil Depth (inches)
OWCH-01-SO-C5-00-06-20250617	200	800	90	**704**	0 - 6
OWCH-02-SO-C5-00-06-20250617				**2,040**	0 - 6
OWCH-02-SO-C5-00-06-20250617-DUP				**2,230**	0 - 6
OWCH-03-SO-C5-00-06-20250617				**743**	0 - 6
OWCH-04-SO-C5-00-06-20250617				**222**	0 - 6

Notes:

Bgs	Below ground surface
DEQ	Montana Department of Environmental Quality
EPA	US Environmental Protection Agency
ID	Identification
Mg/kg	milligram per kilogram
Mg/L	milligram per liter
RSL	Regional Screening Level

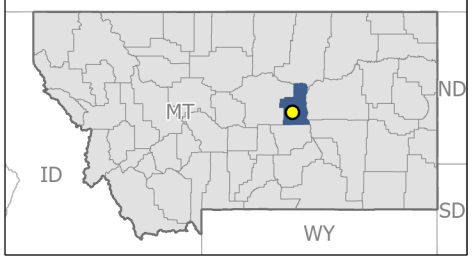
FIGURES

Figure 1: Site Location



Notes:

Source:
Background: ESRI World Topo Imagery
Locations: Tetra Tech, Inc.
Spatial Reference: WGS 1984 Web Mercator Auxiliary Sphere Coordinate System



United States Environmental Protection Agency

Region 8 START V
TD: 2360-2412-02

TETRA TECH

Analyst: M. Caldwell
Date: 1/7/2025

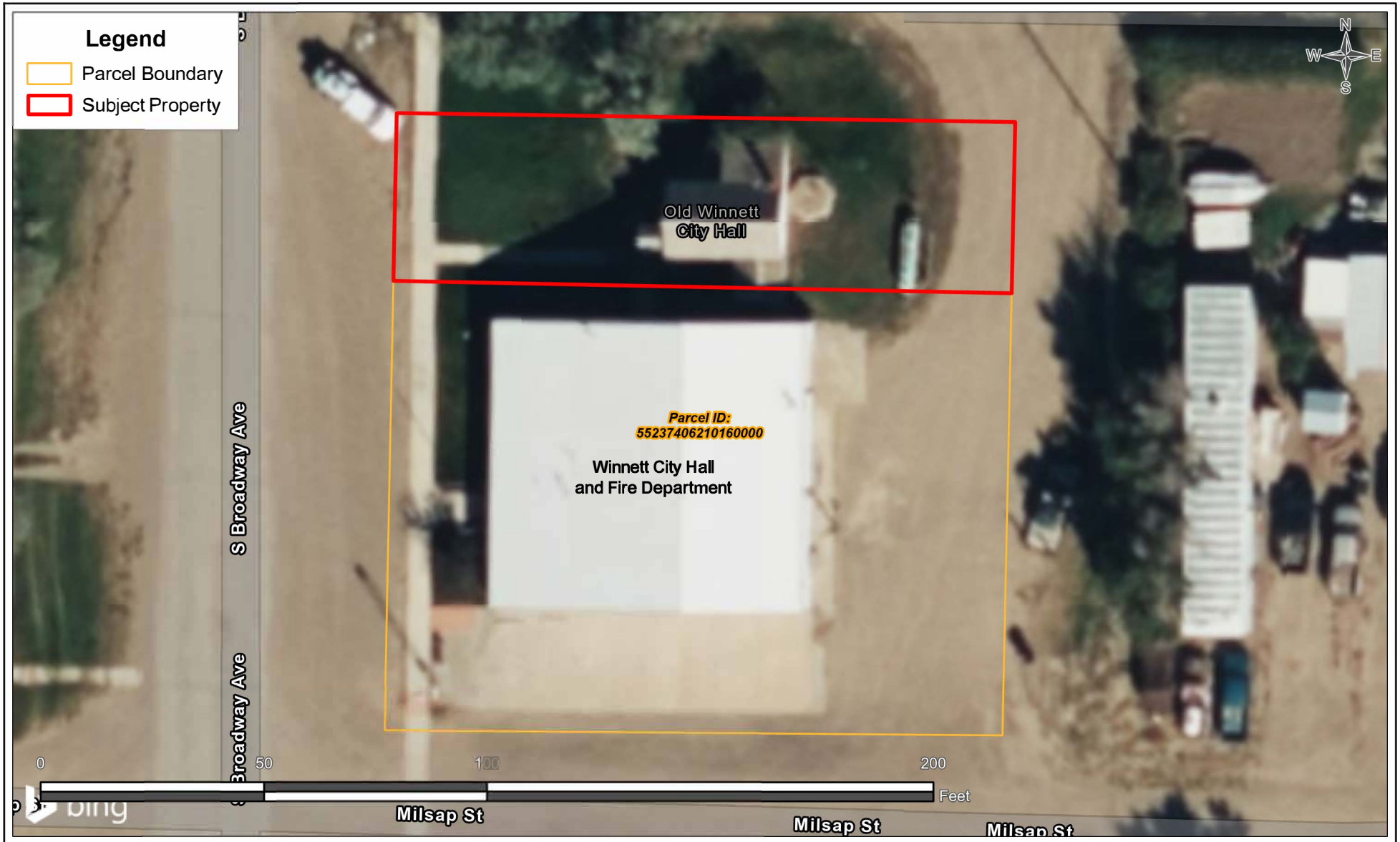
Old Winnett City Hall

Winnett, Petroleum County, Montana

Figure 1
Site Location

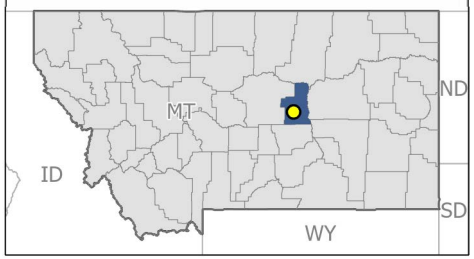
Path: \\etss706gisfs1\CORPArcGisShare\EMI\R08_STARTV\OldWinnettCityHall\OldWinnettCityHall.aprx\Figure 1_OWCH_SiteLocation

Figure 2: Site Layout



Notes:

Source:
Background: ESRI Bing Hybrid Imagery
Locations: Tetra Tech, Inc.
Parcel/ Site Location: Regrid Rest Service
Spatial Reference: WGS 1984 Web Mercator Auxiliary Sphere Coordinate System



United States Environmental Protection Agency

Region 8 START V
TD: 2360-2412-02

TETRA TECH

Analyst: M. Caldwell
Date: 1/14/2025

Old Winnett City Hall

Winnett, Petroleum County, Montana

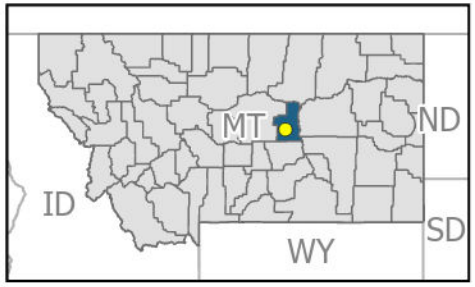
Figure 2
Site Layout

Path: \\etss706gisfs1\CORPArcGisShare\EMI\R08_STARTV\OldWinnettCityHall\OldWinnettCityHall.aprx\Figure 2_OWCH_SiteLayout

Figure 3: Drip Line Soil Sample Locations

Notes:

Service Layer Credits: World Imagery: Maxar, Microsoft



United States Environmental Protection Agency

Region 8 START V
TD: 2360-2412-02

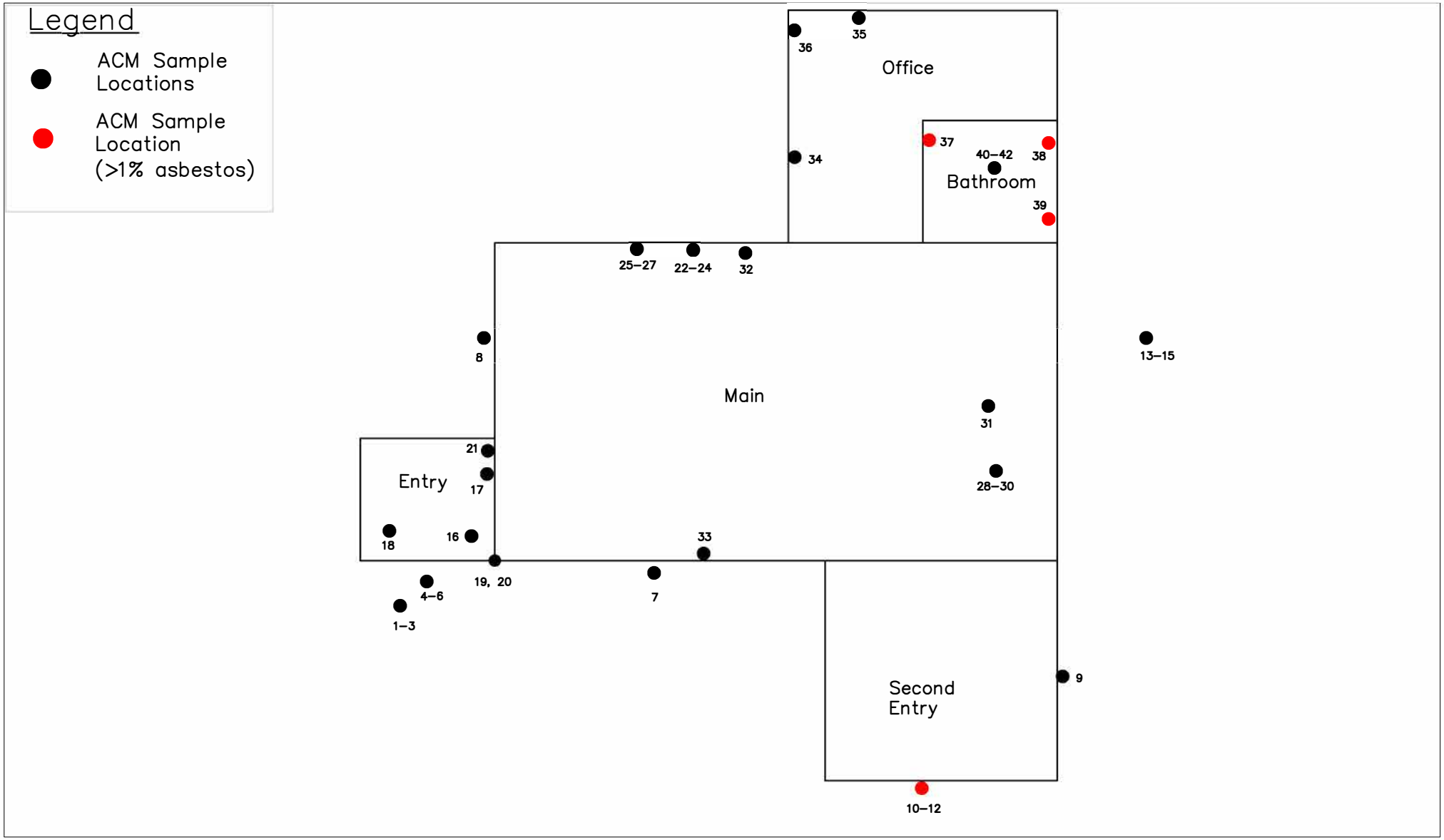
TETRA TECH

Analyst: M. Zilinsky
Date: 8/5/2025

Old Winnett City Hall
116 South Broadway Avenue
Winnett, Petroleum County, MT

Figure 3
Lead Dripline Soil Sampling Locations

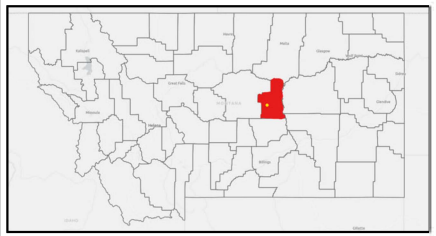
Figure 4: ACM Sample Locations



Notes:
ACM: Asbestos containing material

Sample locations are approximate

Scale 1' = 30'



United States Environmental Protection Agency

Region 8 START V
TD: 2360–2505–02

TETRA TECH

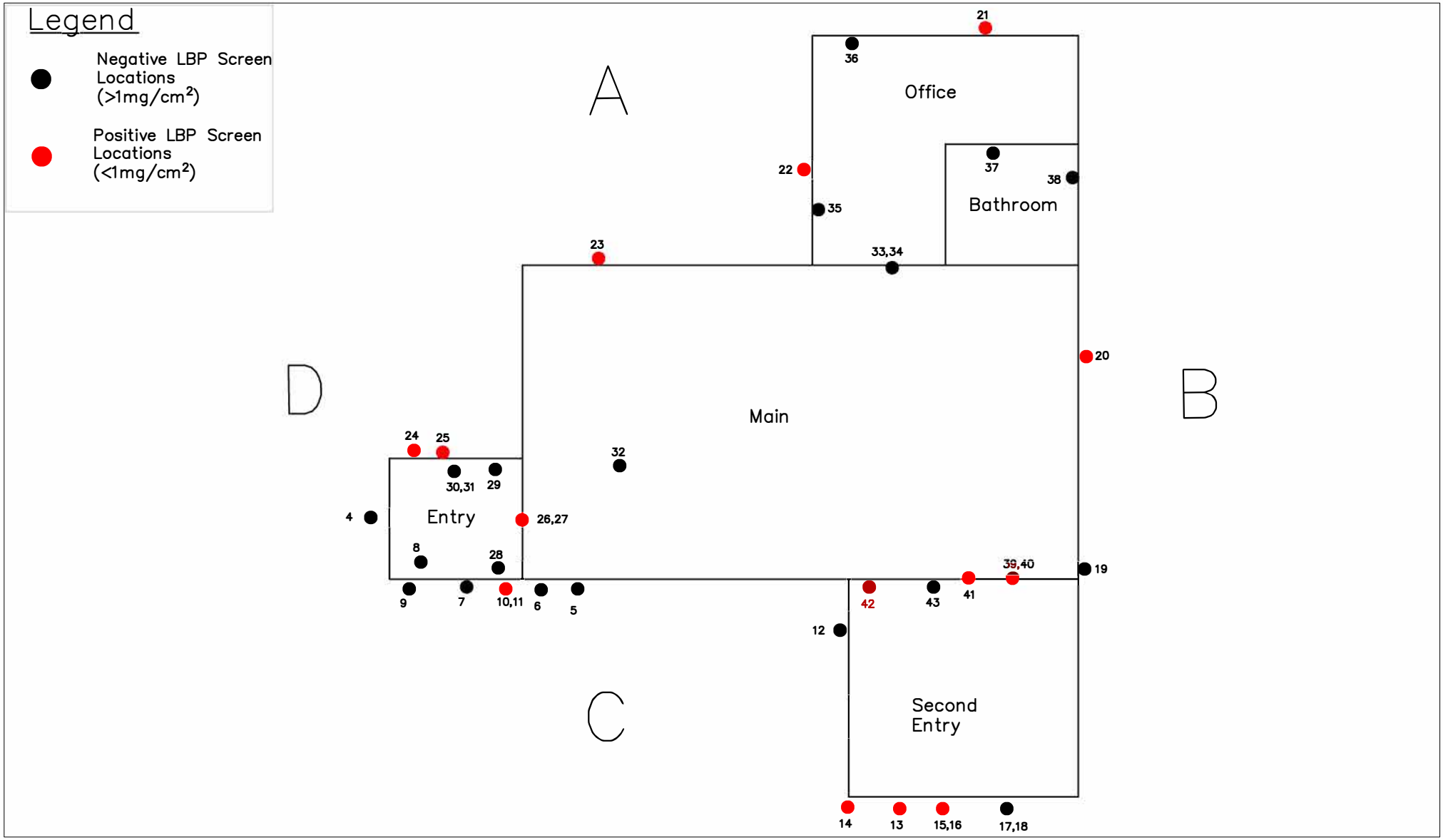
Analyst: Ryan Kizer
Date: 7/29/2025

Old Winnett City Hall

Winnett, Petroleum County, Montana

Figure 4
ACM Sample Locations

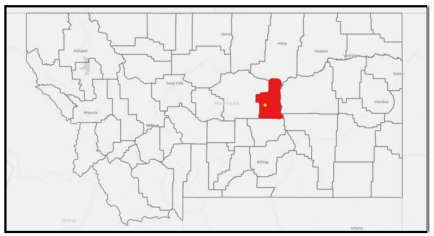
Figure 5: LBP Sample Locations



Notes:
LBP: Lead–Based Paint

Sample locations are approximate

Scale 1' = 30'



United States Environmental Protection Agency

Region 8 START V
TD: 2360–2505–02

TETRA TECH

Analyst: Ryan Kizer
Date: 7/29/2025

Old Winnett City Hall

Winnett, Petroleum County, Montana

Figure 5
LBP Screening Locations

APPENDIX A: PHOTOGRAPHIC DOCUMENTATION

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.40555555555
Photographer:	Kizer_Ryan
Latitude:	47.003407
Longitude:	-108.351491
Photo Direction:	N
Category:	LBP Sample IDs: **10**- 2.73 mg/cm^2 **11**- 5.51 mg/cm^2

Photo Description:
Off-white siding and soffit

Date/Time Taken:	45825.40972222222
Photographer:	Kizer_Ryan
Latitude:	47.003335
Longitude:	-108.351423
Photo Direction:	NNW
Category:	LBP Sample ID: **14**-2.02 mg/cm^2

Photo Description:
Gray drip edge

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.40972222222
Photographer:	Kizer_Ryan
Latitude:	47.003369
Longitude:	-108.351401
Photo Direction:	N
Category:	LBP Sample IDs: **16**-4.71 mg/cm^2 **15**-1.44 mg/cm^2

Photo Description:
Gray window and trim

Date/Time Taken:	45825.41180555556
Photographer:	Kizer_Ryan
Latitude:	47.003408
Longitude:	-108.351329
Photo Direction:	W
Category:	LBP Sample ID: **20**-4.87 mg/cm^2

Photo Description:
Off-white siding on east side

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.41388888889
Photographer:	Kizer_Ryan
Latitude:	47.003525
Longitude:	-108.351425
Photo Direction:	SSE
Category:	LBP Sample ID: **21**-7.80 mg/cm^2

Photo Description:
White siding on north side

Photo Name:
Photos-20250617-155639.jpg

Date/Time Taken:	45825.41458333333
Photographer:	Kizer_Ryan
Latitude:	47.003485
Longitude:	-108.351473
Photo Direction:	E
Category:	LBP Sample ID: **22**-1.05 mg/cm^2

Photo Description:
White siding on east side

Photo Name:
Photos-20250617-155717.jpg

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.41736111111
Photographer:	Kizer_Ryan
Latitude:	47.003448
Longitude:	-108.351482
Photo Direction:	SSE
Category:	LBP Sample ID: **23**-6.28 mg/cm^2

Photo Description:
North side siding6.

Photo Name:
Photos-20250617-160141.jpg

Date/Time Taken:	45825.41875
Photographer:	Kizer_Ryan
Latitude:	47.003457
Longitude:	-108.351501
Photo Direction:	SSE
Category:	LBP Sample ID: **25**-1.79 mg/cm^2

Photo Description:
Brown paint under gray/green on siding trim

Photo Name:
Photos-20250617-160326.jpg

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.425
Photographer:	Kizer_Ryan
Latitude:	47.003402
Longitude:	-108.351492
Photo Direction:	SE
Category:	LBP Sample IDs: **26**-2.64 mg/cm^2 **27**-3.08 mg/cm^2
Photo Description: White door and door frame in entry	
Photo Name: Photos-20250617-161216.jpg	

Date/Time Taken:	45825.42847222222
Photographer:	Kizer_Ryan
Latitude:	47.003423
Longitude:	-108.351436
Photo Direction:	N
Category:	General Site Photos
Photo Description: Stack of light ballasts (no pcbs) on label	
Photo Name: Photos-20250617-161723.jpg	

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.43125
Photographer:	Kizer_Ryan
Latitude:	47.003435
Longitude:	-108.351409
Photo Direction:	N
Category:	General Site Photos
Photo Description: Mold present in office	
Photo Name: Photos-20250617-162119.jpg	

Date/Time Taken:	45825.43402777778
Photographer:	Kizer_Ryan
Latitude:	47.003438
Longitude:	-108.351414
Photo Direction:	ESE
Category:	LBP Sample IDs: **39**-2.92 mg/cm^2 **40**-1.92 mg/cm^2
Photo Description: Door and door trim to 2nd entry	
Photo Name: Photos-20250617-162517.jpg	

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.43541666667
Photographer:	Kizer_Ryan
Latitude:	47.003401
Longitude:	-108.351401
Photo Direction:	NNW
Category:	LBP Sample ID: **41**-6.82 mg/cm^2
Photo Description: Exposed siding on wall of second entry	
Photo Name: Photos-20250617-162708.jpg	

Date/Time Taken:	45825.441666666666
Photographer:	Kizer_Ryan
Latitude:	47.003391
Longitude:	-108.351418
Photo Direction:	W
Category:	LBP Sample ID: **44**-1.03 mg/cm^2
Photo Description: Bathroom stall in basement	
Photo Name: Photos-20250617-163559.jpg	

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.441666666666
Photographer:	Kizer_Ryan
Latitude:	47.003257
Longitude:	-108.351454
Photo Direction:	NNE
Category:	LBP Sample ID: **45**-1.60 mg/cm^2
Photo Description: Door to coal room	
Photo Name: Photos-20250617-163630.jpg	

Date/Time Taken:	45825.456944444444
Photographer:	Kizer_Ryan
Latitude:	47.003388
Longitude:	-108.351529
Photo Direction:	NNE
Category:	ACM Samp ID: WC-1-BM01-A-C WC-1-CON01-A-C
Photo Description: Brick and concrete on front steps	
Photo Name: Photos-20250617-165802.jpg	

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.458333333336
Photographer:	Kizer_Ryan
Latitude:	47.003436
Longitude:	-108.35151
Photo Direction:	ENE
Category:	ACM Samp ID: WC-1-CON02-A-C
Photo Description: Concrete foundation	
Photo Name: Photos-20250617-170025.jpg	

Date/Time Taken:	45825.461111111111
Photographer:	Kizer_Ryan
Latitude:	47.003397
Longitude:	-108.351367
Photo Direction:	NNW
Category:	ACM Samp ID: WC-1-CON03-A-C
Photo Description: Coal chute	
Photo Name: Photos-20250617-170429.jpg	

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.461805555555
Photographer:	Kizer_Ryan
Latitude:	47.003397
Longitude:	-108.35141
Photo Direction:	NW
Category:	ACM Sample ID: WC-1-CK01-A-C

Photo Description:
Window caulk (5% Chrysotile)

Photo Name:
Photos-20250617-170519.jpg

Date/Time Taken:	45825.463194444444
Photographer:	Kizer_Ryan
Latitude:	47.003396
Longitude:	-108.351491
Photo Direction:	WSW
Category:	ACM Samp ID: WC-1-DWJC01-A-C

Photo Description:
Drywall in entryway

Photo Name:
Photos-20250617-170754.jpg

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.464583333334
Photographer:	Kizer_Ryan
Latitude:	47.003422
Longitude:	-108.351478
Photo Direction:	E
Category:	ACM Samp ID: WC-1-WPL01-A-C

Photo Description:
Wood wall panel in main room

Photo Name:
Photos-20250617-170918.jpg

Date/Time Taken:	45825.466666666667
Photographer:	Kizer_Ryan
Latitude:	47.003424
Longitude:	-108.351446
Photo Direction:	NNE
Category:	ACM Samp ID: WC-1-DW01-A-C

Photo Description:
Drywall under the wall panel

Photo Name:
Photos-20250617-171207.jpg

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.467361111114
Photographer:	Kizer_Ryan
Latitude:	47.003428
Longitude:	-108.351458
Photo Direction:	NE
Category:	ACM Samp ID: WC-1-INS01-A-C

Photo Description:
Blown in insulation in ceiling

Photo Name:
Photos-20250617-171320.jpg

Date/Time Taken:	45825.46875
Photographer:	Kizer_Ryan
Latitude:	47.003417
Longitude:	-108.351428
Photo Direction:	W
Category:	ACM Samp ID: WC-1-PB01-A-C

Photo Description:
Particle board on ceiling of main room

Photo Name:
Photos-20250617-171520.jpg

Project Name: Old Winnett City Hall

Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.470138888886
Photographer:	Kizer_Ryan
Latitude:	47.003434
Longitude:	-108.351432
Photo Direction:	NW
Category:	ACM Samp ID: WC-1-PB02-A-C
Photo Description: Particle board in office	
Photo Name: Photos-20250617-171714.jpg	

Date/Time Taken:	45825.470833333333
Photographer:	Kizer_Ryan
Latitude:	47.003417
Longitude:	-108.35141
Photo Direction:	ENE
Category:	ACM Samp ID: WC-1-DWJC02-A-C
Photo Description: Drywall in bathroom: Beige Texture (2% Chrysotile) Biege Joint Compound (2% Chrysotile)	
Photo Name: Photos-20250617-171814.jpg	

Project Name: Old Winnett City Hall

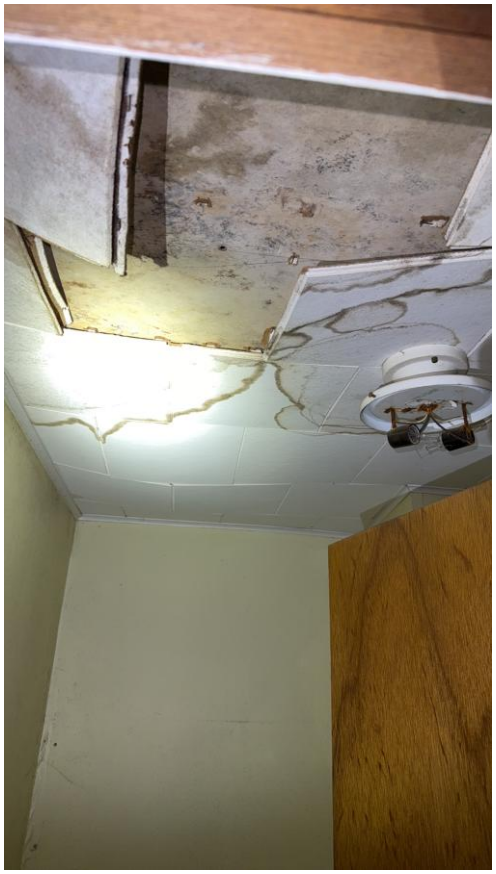
Site Location: Winnett MT, 59087

Project Number: 2360-2505-02

Date/Time Taken:	45825.47152777778
Photographer:	Kizer_Ryan
Latitude:	47.003425
Longitude:	-108.351426
Photo Direction:	ENE
Category:	ACM Samp ID: WC-1-CT01-A-C

Photo Description:
Ceiling tiles in bathroom

Photo Name:
Photos-20250617-171956.jpg



Date/Time Taken:	45825.53055555555
Photographer:	Kizer_Ryan
Latitude:	47.003407
Longitude:	-108.351396
Photo Direction:	NNW
Category:	ACM Samp ID: WC-1-INS02-A-C

Photo Description:
Backed insulation in basement ceiling

Photo Name:
Photos-20250617-184404.jpg

Project Name:
Old Winnett City Hall

Site Location:
Winnett MT, 59087

Project Number:
2360-2505-02

Date/Time Taken:	45825.53055555555
Photographer:	Kizer_Ryan
Latitude:	47.003382
Longitude:	-108.351279
Photo Direction:	NNE
Category:	ACM Samp ID: Not collected. Assumed hot

Photo Description:
Electric wire insulation

Photo Name:
Photos-20250617-184456.jpg

APPENDIX B: INSPECTOR CERTIFICATIONS

RYAN D KIZER

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).

MTA-6224

Asbestos Inspector 01/16/2026

MT DEQ Asbestos Control Program

RYAN D KIZER
5775 BLACK BEAR RD
HELENA MT 59602

United States Environmental Protection Agency

This is to certify that

Ryan D Kizer

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:

Inspector

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 April 23, 2027

LBP-I-I262907-1

Certification #

April 09, 2024

Issued On

Adrienne Priselac, Deputy Director

Land, Chemicals & Redevelopment Division

APPENDIX C: ACM ANALYTICAL PACKAGE

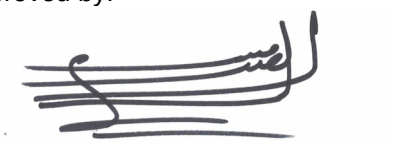
eurofins | Built Environment Testing

Report for:

Tetra Tech START/EPA
Tetra Tech: START/EPA
3101 Zinfandel Dr. Bldg B, Ste 200
Rancho Cordova, CA 95670

Regarding: Eurofins Built Environment Testing West, LLC
Project: 103X903523F0060250502; Old Winnett City Hall
EML ID: 4119125

Approved by:



Approved Signatory
Amin Suliman

Dates of Analysis:
Asbestos PLM: 06-27-2025

Service SOPs: Asbestos PLM (EPA 40CFR App E to Sub E of Part 763 & EPA METHOD 600/R-93-116, SOP EB-AS-S-1267)
NVLAP Lab Code 200728-0

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the samples as received and tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data for sample results with >1% asbestos concentration can be provided when requested.

Eurofins Built Environment Testing West, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built

Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Total Samples Submitted:	45
Total Samples Analyzed:	45
Total Samples with Layer Asbestos Content > 1%:	6

Location: WC-1-BM01-A, Brick and mortar Lab ID-Version‡: 20564042-1

Sample Layers	Asbestos Content
Red-Brown Brick	ND
Gray Mortar	ND
Sample Composite Homogeneity:	Good

Location: WC-1-BM01-B, Brick and mortar Lab ID-Version‡: 20564043-1

Sample Layers	Asbestos Content
Red-Brown Brick	ND
Gray Mortar	ND
Sample Composite Homogeneity:	Good

Location: WC-1-BM01-C, Brick and mortar Lab ID-Version‡: 20564044-1

Sample Layers	Asbestos Content
Red-Brown Brick	ND
Gray Mortar	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CON01-A, Concrete Lab ID-Version‡: 20564045-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

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Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-CON01-B, Concrete

Lab ID-Version‡: 20564046-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

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C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
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ASBESTOS PLM REPORT

Location: WC-1-CON01-C, Concrete Lab ID-Version‡: 20564047-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CON02-A, Concrete Lab ID-Version‡: 20564048-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CON02-B, Concrete Lab ID-Version‡: 20564049-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CON02-C, Concrete Lab ID-Version‡: 20564050-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

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Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-CK01-A, Window caulk Lab ID-Version‡: 20564051-1

Sample Layers	Asbestos Content
Tan Caulk	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: WC-1-CK01-B, Window caulk Lab ID-Version‡: 20564052-1

Sample Layers	Asbestos Content
Tan Caulk	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: WC-1-CK01-C, Window caulk Lab ID-Version‡: 20564053-1

Sample Layers	Asbestos Content
Tan Caulk	5% Chrysotile
Sample Composite Homogeneity:	Good

Location: WC-1-CON03-A, Concrete Lab ID-Version‡: 20564054-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

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Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
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Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-CON03-B, Concrete Lab ID-Version‡: 20564055-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CON03-C, Concrete Lab ID-Version‡: 20564056-1

Sample Layers	Asbestos Content
Gray Concrete	ND
Sample Composite Homogeneity:	Good

Location: WC-1-CP01-A, Green carpet Lab ID-Version‡: 20564057-1

Sample Layers	Asbestos Content
Green Carpet	ND
Composite Non-Asbestos Content:	80% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: WC-1-CP01-B, Green carpet Lab ID-Version‡: 20564058-1

Sample Layers	Asbestos Content
Green Carpet	ND
Composite Non-Asbestos Content:	80% Synthetic Fibers
Sample Composite Homogeneity:	Good

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Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

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C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-CP01-C, Green carpet Lab ID-Version‡: 20564059-1

Sample Layers	Asbestos Content
Green Carpet	ND
Composite Non-Asbestos Content:	80% Synthetic Fibers
Sample Composite Homogeneity:	Good

Location: WC-1-DWJC01-A, Drywall Lab ID-Version‡: 20564060-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Cream Tape	ND
Off-White Joint Compound	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	15% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-DWJC01-B, Drywall Lab ID-Version‡: 20564061-1

Sample Layers	Asbestos Content
Off-White Joint Compound	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-DWJC01-C, Drywall Lab ID-Version‡: 20564062-1

Sample Layers	Asbestos Content
Off-White Texture	ND
Cream Tape	ND
Off-White Joint Compound	ND
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	15% Cellulose
Sample Composite Homogeneity:	Good

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

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Client: Tetra Tech: START/EPA
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Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-WPL01-A, Wood wall panel Lab ID-Version‡: 20564063-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-WPL01-B, Wood wall panel Lab ID-Version‡: 20564064-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-WPL01-C, Wood wall panel Lab ID-Version‡: 20564065-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-DW01-A, Drywall Lab ID-Version‡: 20564066-1

Sample Layers	Asbestos Content
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Good

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Re: 103X903523F0060250502; Old Winnett City Hall

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Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-DW01-B, Drywall Lab ID-Version‡: 20564067-1

Sample Layers	Asbestos Content
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-DW01-C, Drywall Lab ID-Version‡: 20564068-1

Sample Layers	Asbestos Content
Off-White Drywall with Brown Paper	ND
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-INS01-A, Insulation Lab ID-Version‡: 20564069-1

Sample Layers	Asbestos Content
Brown Insulation	ND
Composite Non-Asbestos Content:	95% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-INS01-B, Insulation Lab ID-Version‡: 20564070-1

Sample Layers	Asbestos Content
Brown Insulation	ND
Composite Non-Asbestos Content:	95% Cellulose
Sample Composite Homogeneity:	Good

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-INS01-C, Insulation Lab ID-Version‡: 20564071-1

Sample Layers	Asbestos Content
Brown Insulation	ND
Composite Non-Asbestos Content:	95% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-PB01-A, Particle board Lab ID-Version‡: 20564072-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-PB01-B, Particle board Lab ID-Version‡: 20564073-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-PB01-C, Particle board Lab ID-Version‡: 20564074-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

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Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-PB02-A, Particle board

Lab ID-Version‡: 20564075-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-PB02-B, Particle board

Lab ID-Version‡: 20564076-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-PB02-C, Particle board

Lab ID-Version‡: 20564077-1

Sample Layers	Asbestos Content
Tan Fiberboard	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-DWJC02-A, Drywall

Lab ID-Version‡: 20564078-1

Sample Layers	Asbestos Content
Beige Texture	2% Chrysotile
Cream Tape	ND
Beige Joint Compound	2% Chrysotile
Off-White Drywall with Brown Paper	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Content:	15% Cellulose
Sample Composite Homogeneity:	Poor

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided for this analysis has been performed by following the NESHAP guidelines.

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Eurofins Built Environment Testing West, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built

Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-DWJC02-B, Drywall

Lab ID-Version‡: 20564079-1

Sample Layers	Asbestos Content
Beige Texture	2% Chrysotile
Cream Tape	ND
Beige Joint Compound	2% Chrysotile
Off-White Drywall with Brown Paper	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Content:	15% Cellulose
Sample Composite Homogeneity:	Poor

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided for this analysis has been performed by following the NESHAP guidelines.

Location: WC-1-DWJC02-C, Drywall

Lab ID-Version‡: 20564080-1

Sample Layers	Asbestos Content
Beige Joint Compound	2% Chrysotile
Off-White Drywall with Brown Paper	ND
Composite Asbestos Fibrous Content:	< 1% Asbestos
Composite Non-Asbestos Content:	10% Cellulose
Sample Composite Homogeneity:	Poor

Comments: Composite asbestos content provided is only for Drywall/Joint compound. Composite content provided for this analysis has been performed by following the NESHAP guidelines.

Location: WC-1-CT01-A, Ceiling tile

Lab ID-Version‡: 20564081-1

Sample Layers	Asbestos Content
Brown Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-CT01-B, Ceiling tile

Lab ID-Version‡: 20564082-1

Sample Layers	Asbestos Content
Brown Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

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Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

Location: WC-1-CT01-C, Ceiling tile Lab ID-Version‡: 20564083-1

Sample Layers	Asbestos Content
Brown Ceiling Tile with White Surface	ND
Composite Non-Asbestos Content:	90% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-INS02-A, Insulation Lab ID-Version‡: 20564084-1

Sample Layers	Asbestos Content
Pink Insulation	ND
Brown Paper	ND
Composite Non-Asbestos Content:	90% Glass Fibers 5% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-INS02-B, Insulation Lab ID-Version‡: 20564085-1

Sample Layers	Asbestos Content
Pink Insulation	ND
Brown Paper	ND
Composite Non-Asbestos Content:	90% Glass Fibers 5% Cellulose
Sample Composite Homogeneity:	Good

Location: WC-1-INS02-C, Insulation Lab ID-Version‡: 20564086-1

Sample Layers	Asbestos Content
Pink Insulation	ND
Brown Paper	ND
Composite Non-Asbestos Content:	90% Glass Fibers 5% Cellulose
Sample Composite Homogeneity:	Good

All components not quantified as asbestos content and non-asbestos content are considered to be non-fibrous matrix components. Matrix components may include, but are not limited to, gypsum, paint, silicate minerals, vinyl, binder, calcium carbonate, tar, and foam.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Eurofins Built Environment Testing West, LLC
111 Anza Boulevard, Suite 122, Burlingame, CA 94010
(833) 465-5857 www.eurofinsus.com/Built

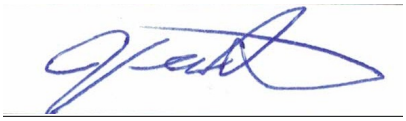
Client: Tetra Tech: START/EPA
C/O: Tetra Tech START/EPA
Re: 103X903523F0060250502; Old Winnett City Hall

Date of Sampling: 06-17-2025
Date of Receipt: 06-20-2025
Date of Report: 06-27-2025

ASBESTOS PLM REPORT

PROJECT ANALYST AND SIGNATORY REPORT

Project Analyst



Analyst: James Schatz

‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

CHAIN OF CUSTODY eurofins

Built Environment Testing

www.eurofinsus.com/Built

East: (866) 871-1984
Central: (800) 651-4802
West: (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
LEVEL None					
Light					
Moderate					
Heavy					

004119125

CONTACT INFORMATION

Company:	Tetra Tech Inc	Address:	825 W Custer Ave, Helena, MT 59602
Contact:	Brandon Kingsbury	Special Instructions:	Please add brandon.kingsbury@tetratech.com and R8START.labreports@tetratechinc.onmicrosoft.com to all deliverables. Please add Rindy.mortensen@tetratech.com for all invoicing.
Phone:	239-994-0474		

PROJECT INFORMATION

Project ID:	103X903523F0060250502		
Project Description:	Old Winnett City Hall		
Project Zip Code:	59087	Sampling Date/Time:	6/17/2025
PO Number:	1220267	Sampled By:	START

TURN AROUND TIME CODES - (TAT)

STD - Standard (Default)
ND - Next Business Day
SD - Same Business Day
WH - Weekend/Holiday/ASAP

Rushes received after 2pm or on weekends, will be considered received the next business day. Please alert us in advance of weekend analysis needs.

REQUESTED SERV

Non-Culturable

Spore Trap

Tape, Swab, Bulk

Culturable

BioCassette™, Andersen, S. Swab, Water, Bulk, Dust, S Contact Plate

SAMPLE ID	DESCRIPTION	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, RH, etc.)	Spore Trap Analysis	Other biological particles - supplement	Direct Microscopic Exam (Qualitative)	Quantitative spore count direct exam	Dust Characterization	1-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	*Legionella* culture	Total Coliform, *E.coli* (Presence/Absence)	QuantiTray-Sewage Screen	OTHER: (please specify test)	Asbestos in Air - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Bulk - PLM	Lead (Pb) - Flame AA	PCR (please specify test)	Allergens (please specify test)
WC-1-BM01-A	BRICK & MORTAR	B	STD																X			
WC-1-BM01-B	BRICK & MORTAR	B	STD																X			
WC-1-BM01-C	BRICK & MORTAR	B	STD																X			
WC-1-CON01-A	CONCRETE	B	STD																X			
WC-1-CON01-B	CONCRETE	B	STD																X			
WC-1-CON01-C	CONCRETE	B	STD																X			
WC-1-CON02-A	CONCRETE	B	STD																X			
WC-1-CON02-B	CONCRETE	B	STD																X			
WC-1-CON02-C	CONCRETE	B	STD																X			
WC-1-CK01-A	WINDOW CAULK	B	STD																X			
WC-1-CK01-B	WINDOW CAULK	B	STD																X			
WC-1-CK01-C	WINDOW CAULK	B	STD																X			
WC-1-CON03-A	CONCRETE	B	STD																X			
WC-1-CON03-B	CONCRETE	B	STD																X			
WC-1-CON03-C	CONCRETE	B	STD																X			

SAMPLE TYPE CODES

BC - BioCassette™	**CP** - Contact Plate	**T** - Tape	**O** - Other:
A1S - Andersen	**ST** - Spore Trap	**SW** - Swab	
SAS - Surface Air Sampler	**B** - Bulk	**SO** - Soil	
NP - Non-potable Water	**P** - Potable Water	**D** - Dust	

RELINQUISHED BY	DATE & TIME

RECEIVED BY	DATE & TIME
6/20/25	930

By submitting this Chain of Custody, you agree to be bound by the terms and conditions set forth at: https://www.eurofinsus.com/environment-testing/built-environment/resources/sampling-guides-and-forms

CHAIN OF CUSTODY eurofins

Built Environment Testing

www.eurofinsus.com/Built

East: (866) 871-1984
Central: (800) 651-4802
West: (866) 888-6653

WEATHER	Fog	Rain	Snow	Wind	Clear
LEVEL None					
Light					
Moderate					
Heavy					

004119125

CONTACT INFORMATION

Company:	Tetra Tech Inc	Address:	825 W Custer Ave, Helena, MT 59602
Contact:	Brandon Kingsbury	Special Instructions:	Please add brandon.kingsbury@tetratech.com and R8START.labreports@tetratechinc.onmicrosoft.com to all deliverables. Please add Rindy.mortensen@tetratech.com for all invoicing.
Phone:	239-994-0474		

PROJECT INFORMATION

Project ID:	103X903523F0060250502		
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REQUESTED SERVICI

Non-Culturable

Spore Trap

Tape, Swab, Bulk

Culturable

BioCassette™, Andersen, SAS Swab, Water, Bulk, Dust, Soil Contact Plate

SAMPLE ID	DESCRIPTION	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, RH, etc.)	Spore Trap Analysis	Other biological particles - supplement	Direct Microscopic Exam (Qualitative)	Quantitative spore count direct exam	Dust Characterization	1-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	*Legionella* culture	Total Coliform, *E.coli* (Presence/Absence)	QuantiTray-Sewage Screen	OTHER: (please specify test)	Asbestos in Air - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Bulk - PLM	Lead (Pb) - Flame AA	PCR (please specify test)	Allergens (please specify test)
WC-1-CP01-A	GREEN CARPET	B	STD																X			
WC-1-CP01-B	GREEN CARPET	B	STD																X			
WC-1-CP01-C	GREEN CARPET	B	STD																X			
WC-1-DW3C01-A	DRYWALL	B	STD																X			
WC-1-DW6C01-B	DRYWALL	B	STD																X			
WC-1-DW3C01-C	DRYWALL	B	STD																X			
WC-1-WP01-A	WOOD WALL PANEL	B	STD																X			
WC-1-WP01-B	WOOD WALL PANEL	B	STD																X			
WC-1-WP01-C	WOOD WALL PANEL	B	STD																X			
WC-1-DW01-A	DRYWALL	B	STD																X			
WC-1-DW01-B	DRYWALL	B	STD																X			
WC-1-DW01-C	DRYWALL	B	STD																X			
WC-1-IN501-A	INSULATION	B	STD																X			
WC-1-IN501-B	INSULATION	B	STD																X			
WC-1-IN501-C	INSULATION	B	STD																X			

SAMPLE TYPE CODES

BC - BioCassette™	**CP** - Contact Plate	**T** - Tape	**O** - Other:
A1S - Andersen	**ST** - Spore Trap	**SW** - Swab	
SAS - Surface Air Sampler	**B** - Bulk	**SO** - Soil	
NP - Non-potable Water	**P** - Potable Water	**D** - Dust	

RELINQUISHED BY	DATE & TIME

RECEIVED BY	DATE & TIME
[signature]	6/20/25 930

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CHAIN OF CUSTODY eurofins

Built Environment Testing

www.eurofinsus.com/Built

East: (866) 871-1984
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West: (866) 888-6653

WEATHER		Fog	Rain	Snow	Wind	Clear
LEVEL	None					
	Light					
	Moderate					
	Heavy					

004119125

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Company:	Tetra Tech Inc	Address:	825 W Custer Ave, Helena, MT 59602
Contact:	Brandon Kingsbury	Special Instructions:	Please add brandon.kingsbury@tetratech.com and R8START.labreports@tetratechinc.onmicrosoft.com to all deliverables. Please add Rindy.mortensen@tetratech.com for all invoicing.
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ND - Next Business Day
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WH - Weekend/Holiday/ASAP

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REQUESTED SERV

SAMPLE ID	DESCRIPTION	Sample Type (Below)	TAT (Above)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, RH, etc.)
WC-1-PB01-A	PARTICLE BOARD	B	STD		
WC-1-PB01-B	PARTICLE BOARD	B	STD		
WC-1-PB01-C	PARTICLE BOARD	B	STD		
WC-1-PB02-A	PARTICLE BOARD	B	STD		
WC-1-PB02-B	PARTICLE BOARD	B	STD		
WC-1-PB02-C	PARTICLE BOARD	B	STD		
WC-1-DW02-A	DRYWALL	B	STD		
WC-1-DW02-B	DRYWALL	B	STD		
WC-1-DW02-C	DRYWALL	B	STD		
WC-1-CT01-A	CEILING TILE	B	STD		
WC-1-CT01-B	CEILING TILE	B	STD		
WC-1-CT01-C	CEILING TILE	B	STD		
WC-1-IN02-A	INSULATION	B	STD		
WC-1-IN02-B	INSULATION	B	STD		
WC-1-IN02-C	INSULATION	B	STD		

Non-Culturable

Spore Trap	Tape, Swab, Bulk

Culturable

BioCassette™, Andersen, Swab, Water, Bulk, Dust, Contact Plate

Spore Trap Analysis	Other biological particles - supplement	Direct Microscopic Exam (Qualitative)	Quantitative spore count direct exam	Dust Characterization	1-Media Surface Fungi (Genus ID + Asp. spp.)	Culturable Air Fungi (Genus ID + Asp. spp.)	Gram Stain and Counts (Culturable Air and Surface Bacteria)	*Legionella* culture	Total Coliform, *E.coli* (Presence/Absence)	Quanti-Tray-Sewage Screen	OTHER: (please specify test)	Asbestos in Air - PCM Airborne Fiber Count (NIOSH 7400)	Asbestos Bulk - PLM	Lead (Pb) - Flame AA	PCR (please specify test)	Allergens (please specify test)
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				
												X				

SAMPLE TYPE CODES

BC - BioCassette™	**CP** - Contact Plate	**T** - Tape	**O** - Other:
A1S - Andersen	**ST** - Spore Trap	**SW** - Swab	
SAS - Surface Air Sampler	**B** - Bulk	**SO** - Soil	
NP - Non-potable Water	**P** - Potable Water	**D** - Dust	

RELINQUISHED BY	DATE & TIME

RECEIVED BY	DATE & TIME
LS	6/20/25 950

By submitting this Chain of Custody, you agree to be bound by the terms and conditions set forth at: https://www.eurofinsus.com/environment-testing/built-environment/resources/sampling-guides-and-forms

Stage 1 Data Verification Checklist

Old Winnett City Hall

68HE0823F0060/2360-2505-02

Reviewed by: Amelia Byl July 9, 2025
Laboratory: Eurofins Built Environment Testing West, LLC, Burlingame, California
Report No: 4119125

X	1.	Chain of custody (CoC) documentation is present.
√	2.	Sample receipt condition information is present and acceptable.
√	3.	Laboratory conducting the analysis is identified.
√	4.	All samples submitted to the laboratory are accounted for.
√	5.	Requested analytical methods were performed.
√	6.	Analysis dates are provided.
√	7.	Analyte results are provided.
√	8.	Result qualifiers and definitions are provided.
√	9.	Result units are reported.
√	10.	Requested reporting limits are present.
√	11.	Method detection limits are present.
X	12.	Sample collection date and time are present.

Discrepancies:

1. The signature, date, and time of sample custody transfer is missing from the "Relinquished By" field of the CoC. No qualification was applied.
12. Sample collection times were missing from the CoC and not reported in the laboratory report. However, sample dates are included. No validation action was necessary.

Notes:

2. The laboratory stated that all samples were received in acceptable condition unless otherwise noted. There were no additional details; therefore, it is assumed the samples met method criteria for analysis.
2. The laboratory noted that samples WC-1-DWJC02-A, WC-1-DWJC02-B, and WC-1-DWJC02-C had poor sample composite homogeneity. No qualification was applied.

APPENDIX D: SOIL ANALYTICAL PACKAGE AND DATA VALIDATION

Analytical Laboratory Report

Report ID: S75878.01(01)+QC01
Generated on 06/27/2025

Report to

Attention: Dustin Mencel
Tetra Tech
1560 Broadway, Suite 1400
Denver, CO 80202

Phone: 952-221-1121 FAX:
Email: dustin.mencel@tetratech.com

Addtional Contacts: R8START

Report produced by

Merit Laboratories, Inc.
2680 East Lansing Drive
East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333

Contacts for report questions:
John Laverty (johnlaverty@meritlabs.com)
Barbara Ball (bball@meritlabs.com)

Report Summary

Lab Sample ID(s): S75878.01-S75878.05
Project: 103x903523F0060250502 / OLD WINNETT CITY HALL
Collected Date(s): 06/17/2025
Submitted Date/Time: 06/20/2025 09:15
Sampled by: Ryan Kizer
P.O. #: 1188792

Table of Contents

Maya Murshak
Technical Director

General Report Notes

Analytical results relate only to the samples tested, in the condition received by the laboratory.
Methods may be modified for improved performance.
Results reported on a dry weight basis where applicable.
'Not detected' indicates that parameter was not found at a level equal to or greater than the reporting limit (RL).
When MDL results are provided, then 'Not detected' indicates that parameter was not found at a level equal to or greater than the MDL.
40 CFR Part 136 Table II Required Containers, Preservation Techniques and Holding Times for the Clean Water Act specify that samples for acrolein and acrylonitrile, and 2-chloroethylvinyl ether need to be preserved at a pH in the range of 4 to 5 or if not preserved, analyzed within 3 days of sampling.
QA/QC corresponding to this analytical report is a separate document with the same Merit ID reference and is available upon request.
Starred (*) analytes are not NY NELAP accredited.
Samples are held by the lab for 30 days from the final report date unless a written request to hold longer is provided by the client.
Report shall not be reproduced except in full, without the written approval of Merit Laboratories, Inc.
Limits for drinking water samples, are listed as the MCL Limits (Maximum Contaminant Level Concentrations)
PFAS requirement: Section 9.3.8 of U.S. EPA Method 537.1 states "If the method analyte(s) found in the Field Sample is present in the FRB at a concentration greater than 1/3 the MRL, then all samples collected with that FRB are invalid and must be recollected and reanalyzed."
Samples submitted without an accompanying FRB may not be acceptable for compliance purposes.
Wisconsin PFAs analysis: MDL = LOD; RL = LOQ. LOD and LOQ are adjusted for dilution.
All accreditations/certifications held by this laboratory are listed on page 3. Not all accreditations/certifications are applicable to this report.
For a specific list of accredited analytes, please feel free to contact the laboratory or visit https://www.meritlabs.com/certifications.

Report Narrative

There is no additional narrative for this analytical report

Laboratory Accreditations (For Reference Only)

Authority	Accreditation ID
Michigan DEQ	#9956
DOD ELAP & ISO/IEC 17025:2017	#69699 PJLA Testing
WBENC	#2005110032
Ohio VAP	#CL0002
Indiana DOH	#C-MI-07
New York NELAC	#11814
North Carolina DENR	#680
North Carolina DOH	#26702
Pennsylvania DEP	#68-05884
Wisconsin DNR	FID# 399147320

Qualifier Descriptions

Qualifier	Description
!	Result is outside of stated limit criteria
B	Compound also found in associated method blank
E	Concentration exceeds calibration range
F	Analysis run outside of holding time
G	Estimated result due to extraction run outside of holding time
H	Sample submitted and run outside of holding time
I	Matrix interference with internal standard
J	Estimated value less than reporting limit, but greater than MDL
L	Elevated reporting limit due to low sample amount
M	Result reported to MDL not RDL
O	Analysis performed by outside laboratory. See attached report.
R	Preliminary result
S	Surrogate recovery outside of control limits
T	No correction for total solids
X	Elevated reporting limit due to matrix interference
Y	Elevated reporting limit due to high target concentration
b	Value detected less than reporting limit, but greater than MDL
e	Reported value estimated due to interference
j	Analyte also found in associated method blank
o	Associated EIS outside of control limits
p	Benzo(b)Fluoranthene and Benzo(k)Fluoranthene integrated as one peak.
q	Qualifier ion ratio outside of control limits
x	Preserved from bulk sample

Glossary of Abbreviations

Abbreviation	Description
RL/RDL	Reporting Limit
MDL	Method Detection Limit
MS	Matrix Spike
MSD	Matrix Spike Duplicate
SW	EPA SW 846 (Soil and Wastewater) Methods
E	EPA Methods
SM	Standard Methods
LN	Linear
BR	Branched

Method Summary

Method	Version
SW3050B	SW 846 Method 3050B Revision 2 December 1996
SW6020A	SW 846 Method 6020A Revision 1 February 2007

Sample Summary (5 samples)

Sample ID	Sample Tag	Matrix	Collected Date/Time
S75878.01	OWCH-01-SO-C5-00-06-20250617	Soil	06/17/25 13:10
S75878.02	OWCH-02-SO-C5-00-06-20250617	Soil	06/17/25 13:30
S75878.03	OWCH-02-SO-C5-00-06-20250617-DUP	Soil	06/17/25 13:30
S75878.04	OWCH-03-SO-C5-00-06-20250617	Soil	06/17/25 13:55
S75878.05	OWCH-04-SO-C5-00-06-20250617	Soil	06/17/25 14:10

Lab Sample ID: S75878.01
Sample Tag: OWCH-01-SO-C5-00-06-20250617
Collected Date/Time: 06/17/2025 13:10
Matrix: Soil
COC Reference: 189320

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	No	21.6	IR
1	32oz Glass	None	No	21.6	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	06/26/25 13:30	JRH	

Metals

Method: SW6020A, Run Date: 06/26/25 14:45, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Lead	704	0.30	0.0065	mg/kg	296	7439-92-1	

Lab Sample ID: S75878.02

Sample Tag: OWCH-02-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 13:30

Matrix: Soil

COC Reference: 189320

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	No	21.6	IR
1	32oz Glass	None	No	21.6	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	06/26/25 13:30	JRH	

Metals

Method: SW6020A, Run Date: 06/26/25 17:50, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Lead	2,040	0.30	0.068	mg/kg	3100	7439-92-1	

Lab Sample ID: S75878.03
Sample Tag: OWCH-02-SO-C5-00-06-20250617-DUP
Collected Date/Time: 06/17/2025 13:30
Matrix: Soil
COC Reference: 189320

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	No	21.6	IR
1	32oz Glass	None	No	21.6	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	06/26/25 13:30	JRH	

Metals

Method: SW6020A, Run Date: 06/26/25 17:52, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Lead	2,230	0.30	0.068	mg/kg	3070	7439-92-1	

Lab Sample ID: S75878.04

Sample Tag: OWCH-03-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 13:55

Matrix: Soil

COC Reference: 189320

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	No	21.6	IR
1	32oz Glass	None	No	21.6	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	06/26/25 13:30	JRH	

Metals

Method: SW6020A, Run Date: 06/26/25 14:49, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Lead	743	0.30	0.0066	mg/kg	299	7439-92-1	

Lab Sample ID: S75878.05

Sample Tag: OWCH-04-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 14:10

Matrix: Soil

COC Reference: 189320

Sample Containers

#	Type	Preservative(s)	Refrigerated?	Arrival Temp. (C)	Thermometer #
1	4oz Glass	None	No	21.6	IR
1	32oz Glass	None	No	21.6	IR

Extraction / Prep.

Parameter	Result	Method	Run Date	Analyst	Flags
Metal Digestion	Completed	SW3050B	06/26/25 13:30	JRH	

Metals

Method: SW6020A, Run Date: 06/26/25 14:50, Analyst: JRH

Parameter	Result	RL	MDL	Units	Dilution	CAS#	Flags
Lead	222	0.30	0.0054	mg/kg	245	7439-92-1	

Quality Control Report

Report ID: S75878.01(01)+QC01
Generated on 06/27/2025

Report to

Attention: Dustin Mencel
Tetra Tech
1560 Broadway, Suite 1400
Denver, CO 80202

Phone: 952-221-1121 FAX:

Report Produced by

Merit Laboratories
2680 East Lansing Drive
East Lansing, MI 48823

Phone: (517) 332-0167 FAX: (517) 332-6333

Report Summary

Lab Sample ID(s): S75878.01-S75878.05
Project: 103x903523F0060250502 / OLD WINNETT CITY HALL
Submitted Date/Time: 06/20/2025 09:15
Sampled by: Ryan Kizer
P.O. #: 1188792

QC Report Sections

Report Flag Descriptions

*: QC result is outside of indicated control limits
W: Surrogate result not applicable due to sample dilution

I certify that this data package is in compliance with the terms and conditions of the program, and project, and contractual requirements both technically and for completeness. Release of the data contained in this hardcopy data package and its computer-readable data submitted has been authorized by the Quality Assurance Manager and his/her designee, as verified by the following signature.

Barbara Ball
Quality Assurance Manager

QC Report - Analysis Summary

Lab Sample ID: S75878.01

Sample Tag: OWCH-01-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 13:10

Matrix: Soil

COC Reference: 189320

Analysis	Method	Run Date/Time	Batch ID	Prep ID	Surr	QC Types
Metals						
Lead	SW6020A	06/26/25 14:45	MT5-25-0626A	MTD-062625-7	No	BLK/LCS/MS/MSD

QC Report - Analysis Summary

Lab Sample ID: S75878.02

Sample Tag: OWCH-02-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 13:30

Matrix: Soil

COC Reference: 189320

Analysis	Method	Run Date/Time	Batch ID	Prep ID	Surr	QC Types
Metals						
Lead	SW6020A	06/26/25 17:50	MT5-25-0626A	MTD-062625-7	No	BLK/LCS/MS/MSD

Lab Sample ID: S75878.03

Sample Tag: OWCH-02-SO-C5-00-06-20250617-DUP

Collected Date/Time: 06/17/2025 13:30

Matrix: Soil

COC Reference: 189320

Analysis	Method	Run Date/Time	Batch ID	Prep ID	Surr	QC Types
Metals						
Lead	SW6020A	06/26/25 17:52	MT5-25-0626A	MTD-062625-7	No	BLK/LCS/MS/MSD

QC Report - Analysis Summary

Lab Sample ID: S75878.04

Sample Tag: OWCH-03-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 13:55

Matrix: Soil

COC Reference: 189320

Analysis	Method	Run Date/Time	Batch ID	Prep ID	Surr	QC Types
Metals						
Lead	SW6020A	06/26/25 14:49	MT5-25-0626A	MTD-062625-7	No	BLK/LCS/MS/MSD

Lab Sample ID: S75878.05

Sample Tag: OWCH-04-SO-C5-00-06-20250617

Collected Date/Time: 06/17/2025 14:10

Matrix: Soil

COC Reference: 189320

Analysis	Method	Run Date/Time	Batch ID	Prep ID	Surr	QC Types
Metals						
Lead	SW6020A	06/26/25 14:50	MT5-25-0626A	MTD-062625-7	No	BLK/LCS/MS/MSD

QC Report - Prep Batch Summary

Metals, Prep Batch ID: MTD-062625-7

Surrogates: No, QC Types: BLK/LCS/MS/MSD

Sample ID	Analysis	Method	Run Date/Time	Batch ID
S75878.01	Lead	SW6020A	06/26/25 14:45	MT5-25-0626A
S75878.02	Lead	SW6020A	06/26/25 17:50	MT5-25-0626A
S75878.03	Lead	SW6020A	06/26/25 17:52	MT5-25-0626A
S75878.04	Lead	SW6020A	06/26/25 14:49	MT5-25-0626A
S75878.05	Lead	SW6020A	06/26/25 14:50	MT5-25-0626A

QC Report - Batch QC Results

Metals, Prep Batch ID: MTD-062625-7

Surrogates: No, QC Types: BLK/LCS/MS/MSD

Blank (BLK)

Lab Sample ID: MT5-25-0626A.115.LRB

Run in Batch: MT5-25-0626A, Run Date: 06/26/2025 14:40, Prep Date: 06/26/2025, Matrix: Liquid, Dilution: 1

Analyte	Flags	Conc	RDL	Units
Lead		ND	0.0006	mg/L

Laboratory Control Sample (LCS)

Lab Sample ID: MT5-25-0626A.114.LCS

Run in Batch: MT5-25-0626A, Run Date: 06/26/2025 14:39, Prep Date: 06/26/2025, Matrix: Liquid, Dilution: 1

Analyte	Flags	% Rec	LCL	UCL
Lead		98	85	115

Matrix Spike (MS)

Lab Sample ID: MT5-25-0626A.127.MS, Parent Sample ID: S75925.05

Run in Batch: MT5-25-0626A, Run Date: 06/26/2025 14:59, Prep Date: 06/26/2025, Matrix: Soil, Dilution: 281

Analyte	Flags	% Rec	LCL	UCL
Lead		88	75	125

Matrix Spike Duplicate (MSD)

Lab Sample ID: MT5-25-0626A.128.MSD, Parent Sample ID: MT5-25-0626A.127.MS

Run in Batch: MT5-25-0626A, Run Date: 06/26/2025 15:00, Prep Date: 06/26/2025, Matrix: Soil, Dilution: 287

Analyte	Flags	% Rec	LCL	UCL	RPD	RPD CL
Lead		91	75	125	2	20

Merit Laboratories Login Checklist

Lab Set ID: S75878
Client: TETRA01 (Tetra Tech)
Project: 103x903523F0060250502 / OLD WINNETT CITY HALL
Submitted: 06/20/2025 09:15 Login User: MMC

Attention: Dustin Mencel
Address: Tetra Tech
1560 Broadway, Suite 1400
Denver, CO 80202

Phone: 952-221-1121 FAX:
Email: dustin.mencel@tetratech.com

Selection				Description	Note
Sample Receiving					
01.	☐ Yes	☒ No	☐ N/A	Samples are received at 4C +/- 2C Thermometer #	IR 21.6
02.	☐ Yes	☒ No	☐ N/A	Received on ice/ cooling process begun	
03.	☒ Yes	☐ No	☐ N/A	Samples shipped	FedEx
04.	☐ Yes	☒ No	☐ N/A	Samples left in 24 hr. drop box	
05.	☒ Yes	☐ No	☐ N/A	Are there custody seals/tape or is the drop box locked	
Chain of Custody					
06.	☒ Yes	☐ No	☐ N/A	COC adequately filled out	
07.	☒ Yes	☐ No	☐ N/A	COC signed and relinquished to the lab	
08.	☒ Yes	☐ No	☐ N/A	Sample tag on bottles match COC	
09.	☐ Yes	☒ No	☐ N/A	Subcontracting needed? Subcontacted to:	
Preservation					
10.	☒ Yes	☐ No	☐ N/A	Do sample have correct chemical preservation	
11.	☐ Yes	☐ No	☒ N/A	Completed pH checks on preserved samples? (no VOAs)	
12.	☐ Yes	☒ No	☐ N/A	Did any samples need to be preserved in the lab?	
Bottle Conditions					
13.	☒ Yes	☐ No	☐ N/A	All bottles intact	
14.	☒ Yes	☐ No	☐ N/A	Appropriate analytical bottles are used	
15.	☒ Yes	☐ No	☐ N/A	Merit bottles used	
16.	☒ Yes	☐ No	☐ N/A	Sufficient sample volume received	
17.	☐ Yes	☒ No	☐ N/A	Samples require laboratory filtration	
18.	☒ Yes	☐ No	☐ N/A	Samples submitted within holding time	
19.	☐ Yes	☐ No	☒ N/A	Do water VOC, TOX, DO or Alkalinity bottles contain	

Corrective action for all exceptions is to call the client and to notify the project manager.

Client Review By: _____ Date: _____

Merit Laboratories, Inc.
2680 East Lansing Dr., East Lansing, MI 48823
Phone (517) 332-0167 Fax (517) 332-4034
www.meritlabs.com

C.O.C. PAGE # 1 OF 1

189320

CHAIN OF CUSTODY RECORD

REPORT TO

CONTACT NAME: BRANDON KINGSBURY
COMPANY: TETRA TECH
ADDRESS: 825 W CUSTER AVE
CITY: HELENA | STATE: MT | ZIP CODE: 59602
PHONE NO.: 239.994.0474 | CELL NO.: | P.O. NO.: MERIT-14
E-MAIL ADDRESS: BRANDON.KINGSBURY@TETRATECH.COM | QUOTE NO.: 1188792

INVOICE TO

CONTACT NAME: ☒ SAME
COMPANY:
ADDRESS:
CITY: | STATE: | ZIP CODE:
PHONE NO.: | E-MAIL ADDRESS:

PROJECT NO./NAME: 103X903523F0060250502 / OLD WINNETT CITY HALL
SAMPLER(S) - PLEASE PRINT/SIGN NAME: RYAN KIZER / RK

TURNAROUND TIME REQUIRED ☐ 1 DAY ☐ 2 DAYS ☐ 3 DAYS ☒ STANDARD ☐ OTHER

DELIVERABLES REQUIRED ☒ LEVEL II ☐ LEVEL III ☒ LEVEL IV ☐ EDD ☐ OTHER

MATRIX CODE: W=WATER GW=GROUNDWATER WW=WASTEWATER S=SOIL L=LIQUID SD=SOLID SL=SLUDGE DW=DRINKING WATER O=OIL WP=WIPE A=AIR WS=WASTE

ANALYSIS (ATTACH LIST IF MORE SPACE IS REQUIRED)

Certifications
☐ OHIO VAP ☐ Drinking Water
☐ DoD ☐ NPDES

Project Locations
☐ Detroit ☐ New York
☐ Other

Special Instructions

MERIT LAB NO. (FOR LAB USE ONLY)	COLLECTION DATE	COLLECTION TIME	SAMPLE TAG IDENTIFICATION-DESCRIPTION	MATRIX	# OF BOTTLES	# Containers & Preservatives: NONE	HCl	HNO_3	H_2SO_4	NaOH	MeOH	OTHER	EPA METHOD 6020B	SIEVE WITH #100 MESH SCREEN
758780.01	6/17/25	1310	OWCH-01-SO-C5-00-06-20250617	S	2								X	X
.02	6/17/25	1330	OWCH-02-SO-C5-00-06-20250617	S	2								X	X
.03	6/17/25	1330	OWCH-02-SO-C5-00-06-20250617-DUP	S	2								X	X
.04	6/17/25	1355	OWCH-03-SO-C5-00-06-20250617	S	2								X	X
.05	6/17/25	1410	OWCH-04-SO-C5-00-06-20250617	S	2								X	X

RELINQUISHED BY: SIGNATURE/ORGANIZATION	DZ KZ TETRA TECH ☒ Sampler	DATE 6/19/25	TIME 1300	
RECEIVED BY: SIGNATURE/ORGANIZATION		DATE	TIME	
RELINQUISHED BY: SIGNATURE/ORGANIZATION		DATE	TIME	
RECEIVED BY: SIGNATURE/ORGANIZATION		DATE	TIME	

RELINQUISHED BY: SIGNATURE/ORGANIZATION	Fedex	DATE 6/20/25	TIME 0915	
RECEIVED BY: SIGNATURE/ORGANIZATION		DATE 6/20/25	TIME 0915	
SEAL NO.	SEAL INTACT YES ☐ NO ☐	INITIALS		
SEAL NO.	SEAL INTACT YES ☐ NO ☐	INITIALS		

☐ ICE (SOLID) ☐ BLUE ICE ☒ NONE
☐ ICE (MELTED)
TEMP. ON ARRIVAL 21.6

PLEASE NOTE: SIGNING ACKNOWLEDGES ADHERENCE TO MERIT'S SAMPLE ACCEPTANCE POLICY ON REVERSE SIDE

Rev. 02/25

July 14, 2025

Mr. Brandon Kingsbury
Tetra Tech Project Manager
1560 Broadway, Suite 1400
Denver, CO 80202

Subject: **Data Validation Report**
Old Winnett City Hall
EPA Contract No.: 68HE0820D0001
Task Order/Technical Direction No.: 68HE0823F0060/2360-2505-02
Document Tracking No. 2081j

Dear Mr. Kingsbury:

Tetra Tech, Inc. (Tetra Tech) is submitting this data validation report for five soil samples (including a field duplicate sample) collected at the Old Winnett City Hall site. The samples were collected on June 17, 2025, and were analyzed for lead by Merit Laboratories in East Lansing, Michigan. The final laboratory data package was received on June 27, 2025.

Analytical data were evaluated in general accordance with the Tetra Tech *Programmatic Quality Assurance Project Plan for EPA Region 8 START V Brownfields Task Order, Superfund Technical Assessment and Response Team (START V), EPA Region 8,* Revision 6 (October 2024), and the EPA *National Functional Guidelines for Inorganic Superfund Methods Data Review* (November 2020).

No rejection or qualification of results was required for this data package. The results may be used as reported by the laboratory.

Please contact me if you have any questions regarding this data validation report.

Sincerely,

Environmental Chemist

Enclosure
cc: Tom Wohlford, Tetra Tech Program Manager
Clayton Longest, Tetra Tech Project Document Control Coordinator
TO/TD File

ATTACHMENT

DATA VALIDATION REPORT
MERIT LABORATORIES REPORT NO. S75878.01

Stage 1 Data Verification Checklist

Old Winnett City Hall

68HE0823F0060/2360-2505-02

Reviewed by: Amelia Byl July 9, 2025
Laboratory: Merit Laboratories, Inc., East Lansing, Michigan
Report No: S75878.01

√	1.	Chain of custody (CoC) documentation is present.
√	2.	Sample receipt condition information is present and acceptable.
√	3.	Laboratory conducting the analysis is identified.
√	4.	All samples submitted to the laboratory are accounted for.
√	5.	Requested analytical methods were performed.
√	6.	Analysis dates are provided.
√	7.	Analyte results are provided.
√	8.	Result qualifiers and definitions are provided.
√	9.	Result units are reported.
X	10.	Requested reporting limits are present.
√	11.	Method detection limits are present.
√	12.	Sample collection date and time are present.

Discrepancies:

10. The reporting limits in the laboratory report, laboratory electronic data deliverable (EDD), validated EDD, and attached analytical results summary table are not adjusted for sample weight and dilutions. No qualifications were applied because all lead sample results were detections and were adjusted for dilutions.

OLD WINNETT CITY HALL SOIL ANALYTICAL RESULTS SUMMARY
MERIT LABORATORIES REPORT NO. S75878.01

Field Sample ID	Method	CAS#	Analyte	Lab Result	Lab Qual	MDL	RL	Units	Val Result	Val Qual
OWCH-01-SO-C5-00-06-20250617	SW6020A	7439-92-1	Lead	704		0.0065	0.3	mg/kg	704	
OWCH-02-SO-C5-00-06-20250617	SW6020A	7439-92-1	Lead	2040		0.068	0.3	mg/kg	2,040	
OWCH-02-SO-C5-00-06-20250617-DUP	SW6020A	7439-92-1	Lead	2230		0.068	0.3	mg/kg	2,230	
OWCH-03-SO-C5-00-06-20250617	SW6020A	7439-92-1	Lead	743		0.0066	0.3	mg/kg	743	
OWCH-04-SO-C5-00-06-20250617	SW6020A	7439-92-1	Lead	222		0.0054	0.3	mg/kg	222	