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# PHASE II ENVIRONMENTAL SITE ASSESSMENT

“LA FOUNTAIN PROPERTY”: 301 W. BROADWAY STREET, LEWISTOWN, MT 59457

Prepared for:



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United States Environmental Protection Agency (EPA) Brownfields Grant

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## **Phase II Environmental Site Assessment**

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# TABLE OF CONTENTS

<b>ACRONYMS .....</b>	<b>iii</b>
<b>1.0 SUMMARY.....</b>	<b>1</b>
<b>2.0 INTRODUCTION.....</b>	<b>4</b>
2.1 Purpose .....	4
2.2 Detailed Scope-of-Services .....	4
2.3 Limitations and Exceptions .....	4
2.4 Special Terms and Conditions .....	5
2.5 Statement of Objectives and Goals .....	5
<b>3.0 SITE DESCRIPTION.....</b>	<b>5</b>
3.1 Location and Legal Description .....	5
3.2 Site and Vicinity General Characteristics.....	6
3.3 Current Use of the Property.....	6
3.4 Descriptions of Structures, Roads, Other Improvements on the Site.....	6
3.5 Current Uses of the Adjoining Properties.....	6
<b>4.0 DESCRIPTION OF WORK PERFORMED AND RATIONALE .....</b>	<b>7</b>
4.1 Asbestos-Containing Material.....	7
4.2 Lead-Based Paint .....	7
4.3 Visual Inspections.....	8
4.4 DEVIATIONS FROM THE SAMPLING AND ANALYSIS PLAN .....	8
<b>5.0 DESCRIPTION OF METHODS USED .....</b>	<b>8</b>
5.1 Asbestos-Containing Material.....	8
5.2 Lead-Based Paint .....	8
<b>6.0 INFORMATION AND DATA ACQUIRED .....</b>	<b>9</b>
6.1 Asbestos-Containing Material.....	9
6.2 Lead-Based Paint General Site Setting .....	9
6.3 PCBS, Mercury, and Mold .....	9
<b>7.0 EVALUATION AND INTERPRETATION OF INFORMATION, DATA, AND RESULTS .....</b>	<b>10</b>

7.1 Asbestos-Containing Material.....	10
7.2 Lead-Based Paint .....	11
7.3 PCBs, Mercury, and Mold.....	12
7.4 Conceptual Site Model.....	12
7.5 Disclosure of Available Data Insufficient to Meet Objectives .....	12
<b>8.0 CONCLUSIONS.....</b>	<b>13</b>
<b>9.0 SIGNATURE OF PHASE II ASSESSOR .....</b>	<b>16</b>
<b>10.0 SPECIFICATIONS FOR ASTM E1903-11 REPORT USE AND RELIANCE.....</b>	<b>17</b>
10.1 Special Terms and Conditions.....	17
10.2 Limitations and Exceptions of Assessment.....	17
10.3 Disclaimers .....	17
<b>11.0 REFERENCES.....</b>	<b>18</b>
<b>12.0 QUALIFICATIONS.....</b>	<b>18</b>

**LIST OF TABLES**

Table 1: LBP Locations, Color, and Estimated Extent.....	2
Table 2: ACM Bulk Material and Number of Samples Collected .....	9
Table 3: LBP Locations, Color, and Percent of Lead .....	11
Table 4: Target Analytes and Exposure Pathways.....	13

**LIST OF APPENDICES**

Appendix A	Figure 1: Subject Property Boundaries and Location Map
Appendix B	Letter Report, Asbestos and Lead-based Paint Inspections
Appendix C	Site Photos (General, PCBs, Mercury, and Mold Inspection Photos)

## ACRONYMS

ACM	Asbestos Containing Material
ASHERA	Asbestos Hazard Emergency Response Act
ARM	Administrative Rules of Montana
ASTM	American Society for Testing and Materials
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
COC	Contaminants of Concern
EPA	United States Environmental Protection Agency
ESA	Environmental Site Assessment
HASP	Health & Safety Plan
HUD	Housing and Urban Development
LBP	Lead Based Paint
MDEQ	Montana Department of Environmental Quality
PCB	Polychlorinated Biphenyl
PLM	Polarized light microscopy
PPE	Personal Protective Equipment
QA/QC	Quality Assurance / Quality Control
RACM	Regulated Asbestos Containing Material
SAP	Sampling and Analysis Plan
SMDC	Snowy Mountain Development Corporation
SOO	Statement of Objectives
SOP	Standard Operating Procedures
TCLP	Toxicity Characteristic Leaching Procedure
WWC	WWC Engineering
XRF	x-ray fluorescence

## 1.0 SUMMARY

Snowy Mountain Development Corporation (SMDC) requested that WWC Engineering (WWC) prepare a Phase II Environmental Site Assessment (ESA) for the “LaFountain Property” at 301 W. Broadway Street, Lewistown, Montana 59457 (subject property). The property is currently owned by the City of Lewistown (City) through tax default. The City is interested in selling the subject property for redevelopment purposes. The parcel has the following legal description: LEWISTOWN ORIG TOWNSITE, SECTION 15, TOWNSHIP 15 NORTH, RANGE 16 EAST, BLOCK C-8, LOT 07-A, 4313 SQUARE FEET, OF AMENDED PLAT OF LOTS 007 009 (0.099 acre), in Fergus County, Lewistown, Montana (Appendix A, Figure 1).

Phase II ESA fieldwork was conducted on August 14 and 15, 2018. The lead and asbestos inspection was performed by Todd Schneider with Northern Industrial Hygiene (Northern) and the associated letter report is located in Appendix B. Beth Famiglietti with WWC inspected the site for polychlorinated biphenyl (PCB) related materials and mercury containing equipment. Results of the Phase II ESA have confirmed the presence of contaminants of concern (COC) at the Site. The following is a summary of the hazardous building material results and conclusions regarding COCs and associated media identified at the Site.

### **Asbestos-Containing Material (ACM)**

Of the 21 samples submitted for laboratory analysis, a total of 1 sample was determined to be “positive” (>1% asbestos) for asbestos. Less than 10 square feet of “Vinyl Sheet Flooring – Tan with large pebble pattern” was identified in Room 103. See Sections 6.0, 7.0 and Appendix B for additional details.

Based on the results of the ACM inspection, asbestos is present, albeit in only one location. ACM is considered to be a COC in relation to the subject property. However, the quantity of ACM (less than 10 square feet) is below the State of Montana regulated amount.

### **Lead-Based Paint (LBP)**

Of the 26 X-ray fluorescence (XRF) readings collected, a total of nine readings were determined to be “positive” (>1 milligrams per square centimeter [mg/cm<sup>2</sup>]) for lead. Table 1 indicates the locations and estimated extents of LBP identified. Second floor window casings and sashes, which are deteriorated, were inaccessible but are assumed to contain LBP, as an interior window sash was positive for LBP. Sections 6.0, 7.0, and Appendix B of this report provide additional details of the lead inspection.

**Table 1: LBP Locations, Color, and Estimated Extent**

Location	Current Surface Paint Color	Estimated Extent (square feet)
Front Entry Vertical Slat Wall	White	60
Front Entry Window Casing	White	10
Front Entry Door Jamb	White	10
Display Window Wall	White	400
Display Window Ceiling	White	250
Single Pane 2 Panel Door & Jamb	Red	25
2 <sup>nd</sup> Floor Window Sash	White	13
Exterior Lower Inlay	Tan	200
Exterior 2 <sup>nd</sup> Floor Window Sash and Casing	White	26

Based on the XRF results, elevated lead concentrations are present on door components, window components, and walls. Although there were positive readings on building exterior surfaces, no bare soils were present around the locations of the readings. Therefore, lead impacts to surface soil were not evaluated. LBP is considered to be a COC.

### **Polychlorinated biphenyls (PCBs), Mercury, and Mold**

Visual inspections were conducted to identify possible PCB-containing equipment, mercury-containing equipment, and mold. A summary of the observations regarding the visual inspections conducted are presented below:

- Two likely PCB-containing ballasts were identified. Both ballasts are located in the basement. One ballast appears to have leaked but the fixture has been removed from the wall and the minor leakage is contained within the fixture. PCBs are considered COCs.
- One thermostat switch was observed; however, it appears that the mercury component has been removed. Mercury is not considered a COC.

- Mold was not observed, despite some minor continued water intrusion into the basement. Mold is not considered a COC.

## **Recommendations**

Based on our knowledge, the inspection results, and the associated letter report prepared by Northern, WWC recommends the following:

- Asbestos was confirmed to be present in one of the suspect materials, however there is a limited amount of asbestos containing material (<10 square feet), which is below the State of Montana regulated amount, and the material is not glued to the subfloor. If future renovation plans involve the removal of this ACM, the material should be wetted, double bagged, and disposed of as asbestos containing waste. It is recommended that work be performed by personnel certified/trained to handle ACM materials.
- Five of the LBP painted components are in a deteriorated condition, including the 2nd story exterior casing and sash. These components should be cleaned and sealed or removed and replaced. The remaining six intact LBP building components should be noted in case renovation work causes an impact to their condition, creating a potential hazard. If the identified intact LBP components are impacted, the component or paint should be removed.

WWC recommends that related work be performed by a United States Environmental Protection Agency (EPA) Lead-Safe certified firm. Additionally, WWC recommends contracting an accredited lead remediation company to determine appropriate remedial actions and/or disposal requirements to address the LBP during the cleanup phase of redevelopment (e.g., encapsulation, chemical stripping, removal, etc.). Dust control methods should be implemented for the debris. It is possible that Toxicity Characteristic Leaching Procedure (TCLP) samples will be required for off-site disposal. The disposal facility will be contacted to determine the appropriate TCLP procedure.

- PCB-containing equipment identified or encountered should be properly removed prior to relevant renovation or demolition activities, and properly disposed of.
- If mercury-containing thermostat switches are encountered, although none were observed, they should be properly removed prior to relevant renovation or demolition activities and properly disposed of.



## **2.0 INTRODUCTION**

### **2.1 PURPOSE**

This Phase II Environmental Site Assessment was conducted in accordance with American Society for Testing and Materials (ASTM) E1903-11 – Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment (ESA) Process. The purpose of a Phase II ESA is to acquire and evaluate information sufficient to achieve the objectives set forth in the Statement of Objectives (SOO) developed by the user(s) and the Phase II Assessor. The scope of a Phase II ESA is related to the activities agreed upon to meet the objectives of the investigation as defined in the SOO which are subject to ongoing evaluation and refinement as the assessment progresses.

This Phase II ESA report contains the results of the data collection activities and associated quality assurance/quality control (QA/QC) measures conducted related to the hazardous building material portion of the overall Phase II ESA investigation at the Site. Information used to conduct this Phase II ESA was based upon reasonably ascertainable, visually and physically observable conditions, and included testing or sampling of materials. The structure of this report is based on the ASTM E1903-11 standard.

### **2.2 DETAILED SCOPE-OF-SERVICES**

WWC Engineering is completing a Phase II ESA on behalf of SMDC. WWC performed this assessment and prepared this report as requested by Kathie Bailey, Executive Director of SMDC.

### **2.3 LIMITATIONS AND EXCEPTIONS**

This report contains the results of a Phase II ESA of the subject property located in Lewistown, Montana.

There may be environmental issues or conditions at a property that parties may wish to assess in connection with real estate that are outside the scope of this practice. Some substances may be present on a property in quantities and under conditions that may lead to contamination of the property or of nearby properties but are not included in the Comprehensive Environmental Response, Compensation and Liability Act's (CERCLA's) definition of hazardous substances (42 USC § 9601(14)) or do not otherwise present potential CERCLA liability. Such substances are beyond the scope of this assessment.

A formal investigation of radon, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological

resources, endangered species, indoor air quality, biological agents, and/or high voltage power lines was beyond the scope of this assessment.

## **2.4 SPECIAL TERMS AND CONDITIONS**

This report is not intended for use by other parties without the written consent of WWC Engineering, SMDC, the City, and/or the EPA.

## **2.5 STATEMENT OF OBJECTIVES AND GOALS**

The objectives were developed by the City (user), SMDC, WWC (Phase II Assessor), and the EPA to obtain sound, scientifically valid data concerning actual property conditions at the Site with respect to the presence or the likely presence of target analytes/substances including, but not limited to, those within the scope of CERCLA. The SOO for the Site were determined during the project meetings, report development, and other communications. The Phase II ESA objectives determined for the Site were as follows:

- Assess and evaluate suspected contaminants that may be present at the Site. Develop sufficient information to reasonably render a professional opinion that, with respect to the potential concerns assessed, hazardous substances either are or are not are present at the property, including the concentrations of the substances if present;
- Gather and provide sufficient data to assist the City and SMDC in making informed decisions with regard to the future use of the property; and
- Gather sufficient data to provide cost estimates for properly disposing of hazardous materials, if necessary.

## **3.0 SITE DESCRIPTION**

### **3.1 LOCATION AND LEGAL DESCRIPTION**

The subject property is located at 301 W. Broadway Street, Lewistown, Montana 59457 and is currently owned by the City through tax default. The current legal description of the subject property located in Fergus County, Lewistown, Montana is:

LEWISTOWN ORIG TOWNSITE, SECTION 15, TOWNSHIP 15 NORTH, RANGE 16 EAST, BLOCK C-8, LOT 07-A, 4313 SQUARE FEET, OF AMENDED PLAT OF LOTS 007 009 (0.099 acre).

The property is generally bound by Broadway Street to the northwest and 3<sup>rd</sup> Avenue North to the northeast. The structure on the subject property was built in 1901. The structure is comprised of three levels and is a portion of a larger structure that extends

onto adjacent properties. The Stockman Casino is located to the west of the subject property and there is a distinct “firewall” (with a door) separating the properties on all levels. The “Reids Building” (with an address and main entrance on Main Street) is separated from the subject property by a “firewall” (with a door) on the main level; however, the upstairs and downstairs have little structural separation. The “Reids Building” was accessed to view the basement of the subject property, as the subject property basement door had been latched, preventing entry. The main level was divided by multiple partition walls. Please see Figure 1 in Appendix A for an aerial view of the subject property, which includes approximate boundaries.

The Phase I ESA, performed by WWC, indicated the possibility of ACM, LBP, and other environmental hazards being present, due to the age of the structure. This Phase II ESA was performed as a result of the conclusions of the Phase I ESA. The “Site Eligibility Determination Outline”, completed by the City, also identifies ACM and LBP as suspected contaminants.

### **3.2 SITE AND VICINITY GENERAL CHARACTERISTICS**

The subject property is currently vacant and consists of a structure most recently used for retail. The subject property is served by municipal water, sewer, and other utilities; however, none of the services were on/operational during the site reconnaissance. The structure on the subject property extends beyond the boundaries of the subject property onto other parcels with other owners. It is ultimately a shared structure with varying degrees of formal division. The subject property appears to be generally flat.

### **3.3 CURRENT USE OF THE PROPERTY**

The subject property is vacant.

### **3.4 DESCRIPTIONS OF STRUCTURES, ROADS, OTHER IMPROVEMENTS ON THE SITE**

The subject property is developed land with a structure bound by a sidewalk and City streets. The structure on the subject property was constructed in 1901. There appears to have been little major structural renovation; mostly aesthetic type features and walls

The City invested nearly \$100,000 to replace the sidewalk adjacent to the subject property. The subject property is served by municipal water, sewer, and other utilities; however, none were operating at the time of the site reconnaissance or field activities.

### **3.5 CURRENT USES OF THE ADJOINING PROPERTIES**

The adjoining property immediately to the west is the Stockman Casino and appears to be an operating Bar/Casino. The adjoining property immediately to the south is currently vacant and has been recently renovated/remodeled (the “Reids Building”). A bank is

located on the other side of 3<sup>rd</sup> Avenue and a Food Bank/Community Cupboard and Post Office are located on the other side of Broadway Street.

## **4.0 DESCRIPTION OF WORK PERFORMED AND RATIONALE**

This section summarizes the work performed and rationale for the work conducted to meet the SOO developed for the investigation as documented in the approved Sampling and Analysis Plan (SAP) for the Site. Deviations from the approved SAP for this Phase II ESA are presented in Section 4.4.

Based upon the SOO developed for the Site, ACM and LBP surveys were conducted along with visual inspections for PCB-containing equipment (e.g., fluorescent light ballasts, transformers, etc.), mercury-containing equipment (e.g., thermostat switches), and mold as part of this Phase II ESA. The investigation included visual inspection, field screening, and/or sample collection for laboratory analysis. Details of the individual media investigations along with rationale are presented below. Photographs are presented in the letter report prepared by Northern located in Appendix B and the Photograph Log located in Appendix C. The Phase II fieldwork was conducted on August 14 and 15, 2018.

### **4.1 ASBESTOS-CONTAINING MATERIAL**

This Phase II ESA involved an ACM survey, including the collection of asbestos samples, in order to establish the extent and presence of ACM. The survey was conducted by an accredited Montana Asbestos Inspector, Mr. Todd Schneider. Visual inspections were primarily conducted on areas of the structures where an individual performing demolition or renovation operations may encounter regulated asbestos-containing material (RACM). Sample locations and the total number of samples were based on Asbestos Hazard Emergency Response Act (AHERA) and Montana Department of Environmental Quality (MDEQ) standards and/or the best professional judgment of the inspector. Generally, each potential RACM location was touched to determine if it was friable. Bulk samples were collected of suspect friable and non-friable RACM and submitted to an asbestos-certified laboratory for analysis.

### **4.2 LEAD-BASED PAINT**

Due to the age of the subject property structure, this Phase II ESA involved a LBP survey by EPA Certified LBP Inspector: Mr. Todd Schneider. In order to conduct the LBP survey, an XRF instrument was used on painted surface locations to determine if materials were positive for lead ( $\geq 1$  milligram per square centimeter [mg/cm<sup>2</sup>]). Visual inspections were conducted on areas of the building and XRF readings were collected based upon the best professional judgment of the inspector.

### 4.3 VISUAL INSPECTIONS

Visual inspections were conducted for potential PCB-containing equipment, mercury-containing equipment, and mold. The visual inspections were conducted in order to make a presence/non-presence determination of the hazards. Quantity and location information was documented where possible, but no samples were collected.

### 4.4 DEVIATIONS FROM THE SAMPLING AND ANALYSIS PLAN

Due to the ongoing evaluation and refinement of the SOO, changes can occur to the approved SAP based upon site conditions encountered. A list of the deviations from the approved SAP are presented below.

- Sample nomenclature was modified to include an identifier letter; for example: F= “flooring”; M = Miscellaneous; S = Surfacing, etc.

No other deviations from the approved SAP were identified during this Phase II ESA.

## 5.0 DESCRIPTION OF METHODS USED

### 5.1 ASBESTOS-CONTAINING MATERIAL

#### Asbestos Bulk Sampling

Personnel performing the sampling wore personal protective equipment (PPE) appropriate to the hazard(s) presented. The asbestos survey was performed using the applicable portions of the currently recognized standard protocol developed for schools under AHERA, as promulgated in Title 40, Code of Federal regulations (40 CFR), part 763 and as amended in the Federal register and as established in the Administrative Rules of Montana (ARM 17.74.354).

#### Laboratory Analytical Methods

Samples collected were sent to EMSL Analytical, Inc. for polarized light microscopy (PLM) analysis in accordance with Method EPA 600/R-93/116.

### 5.2 LEAD-BASED PAINT

#### XRF Readings

XRF in-situ readings were collected using an NITON, XLP 300 handheld XRF instrument to analyze painted surfaces (interior and exterior) for lead during this Phase II ESA. XRF readings of walls, windows, and other painted surfaces in each room equivalent were collected. Room equivalents include painted surfaces that are not considered to be separate rooms such as hallways and closets. A representative number of sample readings were collected from a subset of rooms considered by the certified LBP inspector to be of like surfaces.

The instrument is calibrated prior to use and during use (as applicable).

## **Laboratory Analytical Methods**

Due to no inconclusive readings reported by the XRF instrument, no paint chip samples were collected for laboratory analysis.

## **6.0 INFORMATION AND DATA ACQUIRED**

### **6.1 ASBESTOS-CONTAINING MATERIAL**

A total of 21 bulk samples were collected and submitted for PLM analysis. Where appropriate, samples were collected from areas of the building material already damaged or disturbed. Tables 2 identifies the number of samples that were collected of each bulk material.

**Table 2: ACM Bulk Material and Number of Samples Collected**

<b>Bulk Material</b>	<b>Number of Samples Collected</b>
Flooring	6
Surfacing	1
Gypsum Board	1
Ceiling Panels and Tiles	3
Plaster	1
Window Glazing	2
Miscellaneous Vinyl	1
Interior concrete with coating	1
Exterior concrete, brick, block, and related mortar.	5
Wall texture	1

*\*It was decided before the inspection that roof material sampling would not occur.*

### **6.2 LEAD-BASED PAINT GENERAL SITE SETTING**

A total of 26 XRF readings were taken. Seven readings were exterior and nineteen readings were interior.

### **6.3 PCBS, MERCURY, AND MOLD**

The following observations were made during the visual inspections:

- Many light fixtures at the subject property use fluorescent bulbs, particularly on the main level. Two likely PCB containing light ballasts were located in the basement. A dozen or more light ballasts were identified in a debris pile within the basement. The ballasts in the debris pile appear to be the electronic variety that do not contain PCBs; although the large debris pile was not thoroughly inspected. The main level has extensive fluorescent lighting with dozens of ballasts. Two ballasts were inspected from the landing on the partially constructed stairs and they were labeled “No-PCBs.” It is possible that some

of the uninspected ballasts on the main level could contain PCBs, although it is not expected. No fluorescent lighting or associated ballasts were observed on the top level. No transformers were observed at the subject property.

- One thermostat switch was observed; however, the mercury component appears to have been removed.
- Mold was not observed.

## **7.0 EVALUATION AND INTERPRETATION OF INFORMATION, DATA, AND RESULTS**

The evaluation and interpretation of the information, data, and results for the Phase II ESA are presented below. This section summarizes the field screening data and laboratory results obtained to identify the location and extent of contamination. Benchmarks used for comparison are listed below:

### **ACM**

- Asbestos-Containing Materials in Schools Rule (40 Code of Federal Regulations [CFR] Part 763, Subpart E): ACM is defined as any material containing more than one percent (1%) asbestos.

### **LBP**

- All painted components were tested, however the amount of sampling per U.S. Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Edition) were not followed, as the building is not expected to be used for residential purposes. The HUD benchmark for lead-based paint is greater than or equal to 1.0 milligrams per centimeter square ( $\geq 1.0 \text{ mg/cm}^2$ ) and this benchmark was utilized during this inspection.

Detailed sampling information is located in Appendix B.

### **7.1 ASBESTOS-CONTAINING MATERIAL**

Of the 21 samples submitted for laboratory analysis, one sample was reported as “positive” ( $>1\%$  asbestos) or trace ( $<1\%$  asbestos) for asbestos. The one positive sample was not friable and was determined to be 15% chrysotile.

ACM sample collection locations and laboratory analysis are presented in Appendix B.

## Interpretation of Results

Based on the laboratory results reported for the one confirmed ACM sample, asbestos is present at the subject property. ACM is considered to be a COC in relation to the Site. However, there is a limited amount of ACM (<10 square feet), which is below the State of Montana regulated amount, and the material is not glued to the subfloor. If future renovation plans involve the removal of this asbestos-containing material, the material should be wetted, double bagged, and disposed of as asbestos containing waste. It is recommended that work be performed by personnel certified/trained to handle ACM materials.

### 7.2 LEAD-BASED PAINT

Of the 26 XRF readings taken from the building, a total of nine readings were positive for LBP contamination ( $\geq 1$  mg/cm<sup>2</sup>). Table 3 indicates the location, current surface paint color, and percent lead of LBP identified. Second floor window casings and sashes, which are deteriorated, were inaccessible but are assumed to contain LBP, as an interior window sash was positive for LBP.

**Table 3: LBP Locations, Color, and Percent of Lead**

Location	Current Surface Paint Color	% LBP (mg/cm <sup>2</sup> )
Front Entry Vertical Slat Wall	White	10
Front Entry Window Casing	White	8.8
Front Entry Door Jamb	White	6.7
Display Window Wall	White	1.5
Display Window Ceiling	White	1.8
Single Pane 2 Panel Door & Jamb	Red	3.1 / 8.4
2 <sup>nd</sup> Floor Window Sash	White	4
Exterior Lower Inlay	Tan	3.4
Exterior 2 <sup>nd</sup> Floor Window Sash and Casing	White	N/A (Assumed)

A complete list of LBP readings is presented in Appendix B. The location and approximate extent of LBP identified is presented in Appendix B (photos) and Table 1.0 (estimate).



### 7.3 PCBs, MERCURY, AND MOLD

The following observations were made during the visual inspections:

- Many light fixtures at the subject property use fluorescent bulbs, particularly on the main level. Two likely PCB containing light ballasts were located in the basement. A dozen or more light ballasts were identified in a debris pile within the basement. Most of the ballasts in the debris pile appear to be the electronic variety that do not contain PCBs; although the debris pile was not thoroughly inspected. The main level has extensive fluorescent lighting with dozens of ballasts. Two ballasts were inspected from the landing on the partially constructed stairs and they were labeled “No-PCBs.” It is possible that some of the uninspected ballasts on the main level could contain PCBs, although it is not expected. No fluorescent lighting or associated ballasts were observed on the top level. No transformers were observed at the subject property.
- One thermostat switch was observed; however, the mercury component appears to have been removed.
- Mold was not observed.

### 7.4 CONCEPTUAL SITE MODEL

Per ASTM E1903-11 (Section 6.4.6), validation of the conceptual site model is conducted by evaluating testing results and other investigation findings to determine whether available information is sufficient to support sound conclusions regarding the presence of the target analytes. The presence of the target analytes investigated as part of this Phase II ESA along with the current exposure pathways, as applicable, for the Site is presented in Table 4.

### 7.5 DISCLOSURE OF AVAILABLE DATA INSUFFICIENT TO MEET OBJECTIVES

Per ASTM E1903-11 (Section 1.3.2), all Phase II ESA reports must disclose any respect in which available data are insufficient to meet the objectives of the assessment.

Based upon the objectives for this Phase II ESA, all objectives were met based upon the available data. In no respect was the available data insufficient to meet the objectives. However, it is important to note that second floor window casings and sashes, which are deteriorated, were inaccessible but are assumed to contain LBP, as an interior window sash was positive for LBP.

**Table 4: Target Analytes and Exposure Pathways**

Target Analytes	Media	Contaminants Present Above Screening Benchmarks	Exposure Pathway	Exposure Route	Human Receptors	
					Residential	Workers
ACM	Building Materials	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
LBP	Building Materials	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
PCBs	Building Materials (light ballasts)	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X

**Comments:** Evaluation of exposure pathway completeness is based upon the current site use as vacant and assumes that no people are currently accessing the Site or will be accessing the Site other than workers during future redevelopment. Once future site-specific activities are determined or if a change in current use occurs, exposure pathways should be re-assessed as they may alter the pathway completeness presented in this report and require further evaluation prior to conducting any activities or change in use at the Site.

Note:

-- = Receptor not at risk (Currently)

X = Receptor at risk to exposure (Currently or Potentially)

## 8.0 CONCLUSIONS

WWC performed a Phase II ESA in conformance with the scope and limitations of ASTM Practice E1903-11 for the property at 301 W. Broadway Street in Lewistown, Montana (subject property). The subject property is also referred to as the La Fountain property. The following list is a summary of the conclusions regarding COC and associated media identified by WWC at the subject property:

### Asbestos-Containing Material

- Based on the results of the ACM inspection, asbestos is present, albeit in only one location. ACM is considered to be a COC in relation to the subject property. However, the quantity of ACM (less than 10 square feet) is below the State of Montana regulated amount.

### Lead-Based Paint

- Based on the XRF results, elevated lead concentrations are present on door components, window components, and walls. Although there were positive readings on building exterior surfaces, no bare soils were present around the locations of the readings. Therefore, lead impacts to surface soil were not evaluated. LBP is considered to be a COC.

### PCBs, Mercury, and Mold

A summary of the observations regarding the visual inspections conducted are presented below:

- Many light fixtures at the subject property use fluorescent bulbs, particularly on the main level. Two likely PCB containing light ballasts were located in the basement. A dozen or more light ballasts were identified in a debris pile within the basement. Most of the ballasts in the debris pile appear to be the electronic variety that do not contain PCBs; although the debris pile was not thoroughly inspected. The main level has extensive fluorescent lighting with dozens of ballasts. Two ballasts were inspected from the landing on the partially constructed stairs and the ballasts were labeled “No-PCBs.” It is possible that some of the uninspected ballasts on the main level could contain PCBs, although it is not expected. No fluorescent lighting or associated ballasts were observed on the top level. No transformers were observed at the subject property.
- One thermostat switch was observed; however, the mercury component appears to have been removed.
- Mold was not observed.

## **RECOMMENDATIONS**

Based on our knowledge, the inspection results, and the associated letter report prepared by Northern, WWC recommends the following:

- Asbestos was confirmed to be present in one of the suspect materials, however there is a limited amount of asbestos containing material (<10 square feet), which is below the State of Montana regulated amount, and the material is not glued to the subfloor. If future renovation plans involve the removal of this ACM, the material should be wetted, double bagged, and disposed of as asbestos containing waste. It is recommended that work be performed by personnel certified/trained to handle ACM materials.
- Five of the LBP painted components are in a deteriorated condition, including the 2<sup>nd</sup> story exterior casing and sash. These components should be cleaned and sealed or removed and replaced. The remaining six intact LBP building components should be noted in case renovation work causes an impact to their condition, creating a potential hazard. If the identified intact LBP components are impacted, the component or paint should be removed.

WWC recommends that related work be performed by an EPA Lead-Safe certified firm. Additionally, WWC recommends contracting an accredited lead remediation company to determine appropriate remedial actions and/or disposal requirements to address the LBP during the cleanup phase of redevelopment (e.g., encapsulation, chemical stripping, removal, etc.). Dust control methods should be

implemented for the debris. It is possible that TCLP samples will be required for on-site or off-site disposal.

- PCB-containing equipment identified or encountered should be properly removed prior to relevant renovation or demolition activities, and properly disposed of.
- Although mercury-containing thermostat switches were not identified, if they are encountered, they should be properly removed and disposed prior to renovation or demolition activities.

## 9.0 SIGNATURE OF PHASE II ASSESSOR

This Phase II ESA was completed by the following WWC personnel and subcontractor:

Mr. Garth French, P.E., Project Manager

Ms. Beth Famiglietti, Project Scientist

Mr. Todd Schneider, Lead and Asbestos Inspector with Northern.

Ms. Beth Famiglietti has undertaken the role of Phase II Assessor for this assessment. The following is the certification statement as defined in ASTM Practice E1903-11 (Section 9.2.1):

*We have performed a Phase II environmental site assessment at the subject property at 301 W. Broadway Street, Lewistown, Montana, in conformance with the scope and limitations of ASTM Practice E1903-11 and for the following objectives:*

- Assess and evaluate suspected contaminants that may be present at the Site. Develop sufficient information to reasonably render a professional opinion that, with respect to the potential concerns assessed, hazardous substances either are or are not are present at the property, including the concentrations of the substances if present;*
- Gather and provide sufficient data to assist the grant recipient and partners to make informed decisions with regard to the future use of the property; and*
- Gather sufficient data to provide cost estimates for properly disposing hazardous materials, if necessary.*

Beth A. Famiglietti

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**Certifying Environmental Professional**

Project Scientist

---

**Title**

---

**Signature**

---

**Date**

## **10.0 SPECIFICATIONS FOR ASTM E1903-11 REPORT USE AND RELIANCE**

### **10.1 SPECIAL TERMS AND CONDITIONS**

This document has been prepared by EPA for the use and benefit of the EPA, SMDC, and partners. Any use of this document or information herein by persons or entities other than the EPA, SMDC, or partners, without the express written consent of WWC, will be at the sole risk and liability of said person or entity. WWC will not be liable to the EPA, SMDC, or such persons or entities, for any damages resulting therefrom. It is understood that this document may not include all information pertaining to the described site.

### **10.2 LIMITATIONS AND EXCEPTIONS OF ASSESSMENT**

ASTM E1903-11 (Section 4.2.1) acknowledges that “No Phase II ESA can eliminate all uncertainty. Furthermore, any sample, either surface or subsurface, taken for chemical testing may or may not be representative of a larger population. Professional judgment and interpretation are inherent in the process, and even when exercised in accordance with objective scientific principles, uncertainty is inevitable. Additional assessment beyond that which was reasonably undertaken may reduce the uncertainty”. ASTM E1903-11 (Section 4.2.1.2) acknowledges that “The effectiveness of a Phase II ESA may be compromised by limitations or defects in the information used to define the objectives and scope of the investigation, including inability to obtain information concerning historic site uses or prior site assessment activities despite the efforts of the user and Phase II Assessor to obtain such information in accordance with 5.1.3”. Furthermore, the ASTM E1903-11 (Section 4.2.2) states “Phase II ESAs do not generally require an exhaustive assessment of environmental conditions on a property. There is a point at which the cost of information obtained and the time required to obtain it outweigh the benefit of the information and, in the context of private transactions and contractual responsibilities, may become a material detriment to the orderly conduct of business. If the presence of target analytes is confirmed on a property, the extent of further assessment is a function of the degree of confidence required and the degree of uncertainty acceptable in relation to the objectives of the assessment”.

### **10.3 DISCLAIMERS**

WWC has performed this Phase II ESA in general conformance with the scope and limitations of ASTM E1903-11 standards. The Phase II ESA findings and conclusions presented herein are professional opinions based solely on data collected during the assessment and/or interpretation of information and past data provided for review. The information and data collected from the subject property by WWC is based on the conditions existing on the date(s) of WWCs assessment activities at the property. WWC does not warrant or guarantee information obtained from third parties used for this assessment are correct, complete, and/or current.

Though WWC did collect samples and/or perform testing during this assessment, it is possible that past contamination remains undiscovered or that property conditions will change in the future. WWC does not warrant or guarantee the property suitable for any particular purpose or certify the property as “clean.”

ASTM E1903-11 (Section 1.5) states “This practice is not intended to supersede applicable requirements imposed by regulatory authorities. This practice does not attempt to define a legal standard of care either for the performance of professional services with respect to matters within its scope, or for the performance of any individual *Phase II Environmental Site Assessment*”.

Information, limitations, and disclaimers provided in this general section apply to all of the sections included in this report.

## 11.0 REFERENCES

American Society for Testing & Materials (ASTM). 2011. Standard Practice for Environmental Site Assessments: Phase II Environmental Site Assessment Process, E1903-11.

Northern Industrial Hygiene. 2018. Letter Report for Asbestos and Lead-based Paint Inspections at Project.

WWC Engineering. 2018. Project Phase I ESA.

WWC Engineering. 2018. Project SAP/ Health & Safety Plan (HASP).

## 12.0 QUALIFICATIONS

WWC utilized qualified, professional staff, trained in performing the scope of work required for this Phase II ESA. The project team included a project manager, a QA/QC lead, and technical specialist(s). Their roles are described in more detail as follows:

WWC Project Manager: Mr. Garth French, P.E. is a professional Engineer with a B.S. in Civil Engineering (2004), and 14 years of experience in the field of engineering. Garth has worked on hydrogeologic investigations, permitting, SAP preparation, clean-up oversight, and clean-up reports.

WWC Project Scientist: Ms. Beth Famiglietti, has a B.S. in Environmental Science (1996) with over 21 years of professional environmental experience in the field of environmental sciences including, but not limited to, Phase I site investigations, spill investigations, SAP/ Standard Operating Procedures (SOP) preparation,

permitting, stormwater inspections, and soil and water sampling. Beth has worked on multi-million-dollar projects throughout the west.

Northern Asbestos and Lead Inspector: Mr. Todd Schneider has a B.S. in Biology (2005). Todd was formerly a health and safety regulator in the state of Missouri. Todd is a certified asbestos and LBP inspector with several years of experience in Montana and other EPA administered states.



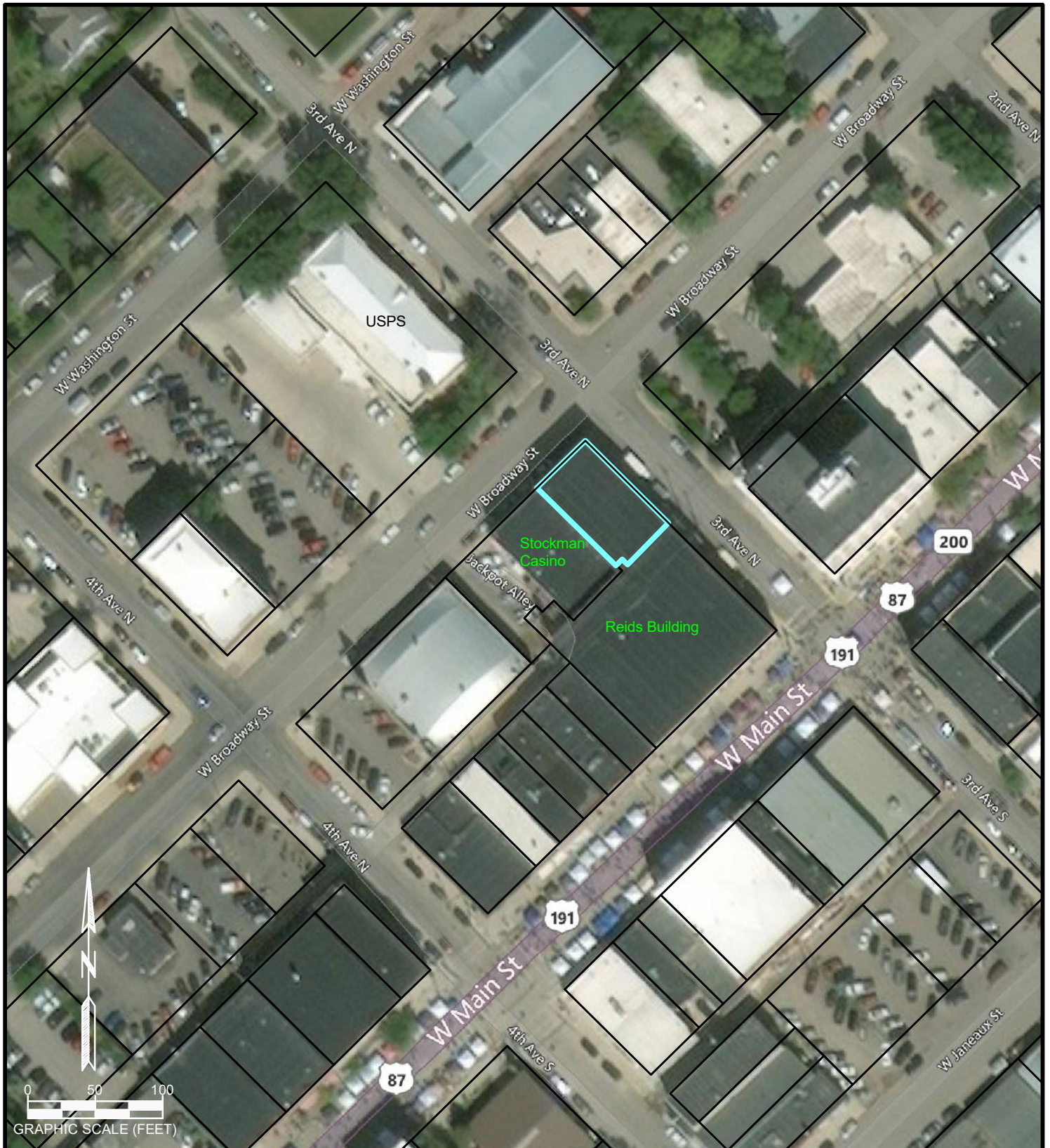
# **APPENDICES**



## **Appendix A**

### **Figure 1: Subject Property Boundaries and Location Map**



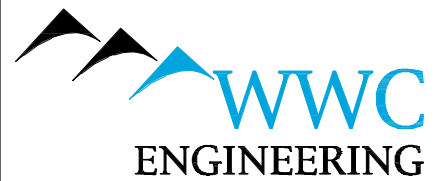


# FIGURE 1

SUBJECT PROPERTY BOUNDARIES  
AND LOCATION MAP

## LEGEND

- ▬ SUBJECT PROPERTY
- PARCELS





## **Appendix B**

**Letter Report,**

**Asbestos and Lead-based Paint  
Inspections,**

**prepared by Northern Industrial Hygiene**







201 South 30th Street  
Billings, Montana 59101  
Phone: 406/245-7766  
FAX: 406/254-1428

August 29, 2018

Mrs. Beth Famiglietti  
WWC Engineering  
51 N. 15<sup>th</sup> Street, Ste. 1  
Billings, MT 59101

RE: Letter Report  
Asbestos and Lead-based Paint Inspections  
Commercial Building  
301 W. Broadway St., Lewistown, Montana  
Northern Project Number 999-3727

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Dear Mrs. Famiglietti:

This letter report provides the summarized results of the asbestos and lead-based paint inspections performed by Todd Schneider (MTA-5179) of Northern Industrial Hygiene, Inc. (Northern) on August 14 and 15, 2018 at the above referenced site. The inspections were performed to identify potential hazardous materials that may be present in the building, for building records and future remodel activities. The inspections included the interior and the exterior, excluding the roof.

### **Overview of Building**

The building is a two story structure that includes a full basement. It was constructed in the early 1900's with several minor renovations with unknown dates. There are approximately 12,000 square feet of interior space.

Typical interior building materials include concrete, wood, carpet, vinyl and tile finished floors, gypsum board, plaster and concrete finished walls and gypsum board, plaster or lay-in panel finished ceilings. Some concrete floors have a poured-on finish material present while some walls are further finished with texture. Lower walls in some areas are finished with wood baseboards or vinyl cove bases.

Exterior building finish materials consist of concrete, metal, glass, wood, stone block and brick. The exterior windows on the first floor are metal framed whereas the windows on the 2<sup>nd</sup> floor are wood framed. The roof was not part of the project scope, so it was not accessed as part of this inspection.

Typical interior painted building components are walls, windows, doors, columns, and posts.

Typical exterior painted building components are glass, metal and wood.

The building is ducted for a forced air system, but the furnace had been removed prior to Northern's inspection. No insulation was observed in the building.

## **Asbestos Overview**

Asbestos is a trade name for a group of fibrous naturally occurring minerals that were used widely in building materials because of its ability to bind, resist chemicals, insulate, and fireproof. Exposure to elevated levels of asbestos fibers has been documented to cause a variety of diseases including asbestosis and cancer. Consequently, the application, removal, and disposal of asbestos-containing materials is regulated by several agencies.

Asbestos in most building materials poses little threat to human health as long as the asbestos fibers are securely bound within the building material. However, as the materials deteriorate because of time or exposure, or are disturbed because of human or other activities, the potential increases for the fibers to become airborne. When this occurs, the risk to human health increases significantly when the fibers are inhaled.

The NESHAP defines ACM as a material containing greater than (>) 1% asbestos and assigns ACM to three categories: regulated asbestos-containing material (RACM), Category I, and Category II. RACM is defined as an ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure (friable). RACM also includes: Category I and Category II materials that will be (or have been) subjected to sanding, grinding, cutting or abrading, or; Category II materials that have a high probability of becoming (or have become) crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition/renovation operations. Category I ACMs are non-friable packings, gaskets, resilient floor covering, and asphalt roofing products. Category II ACMs are non-friable materials, excluding Category I non-friable ACMs, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

The NESHAP requires that the building owner or operator provide notification at least 10 working days prior to commencing renovation activities that will disturb more than 160 square feet (SF) or 260 linear feet (LF) of RACM, or prior to any demolition activities. The NESHAP also requires that RACM be removed prior to renovation/demolition activities that will disturb the material.

The MDEQ adopted the NESHAP by reference and requires the building owner/operator to apply for an Asbestos Abatement Permit at least 5 working days prior to commencing asbestos abatement project involving > 10 SF but less than (<) 160 SF in surface area or >3 LF but < 260 LF of RACM. The permit application must be submitted at least ten working days prior to commencing an asbestos abatement project involving >160 SF or 260 LF of RACM or prior to any demolition. Notification of the MDEQ satisfies the NESHAP notification requirement.

The MDEQ requires that personnel conducting permitted asbestos abatement projects be accredited by the State of Montana. The MDEQ also requires an asbestos abatement design be prepared by a State of Montana accredited asbestos project designer for projects requiring an Asbestos Abatement Project Permit.

The Occupational Safety and Health Administration (OSHA) requires that employees that will be exposed to any amount of asbestos be trained in accordance with the provisions of 29 CFR 1926.1101. The OSHA standard also requires that employee exposure to asbestos fibers not exceed either the permissible exposure limit (PEL) of 0.1 fibers per cubic centimeter (f/cc) of air for an eight (8) hour time-weighted average (TWA) or the excursion limit (EL) of 1.0 f/cc for any thirty (30) minute work period.

Mrs. Beth Famiglietti  
301 W. Broadway St.  
Lewistown, Montana  
August 29, 2018  
Page 3

### **Lead-Based Paint Overview**

Lead is found in the paint on the inside and outside of many buildings. Most buildings constructed prior to World War II had lead-based paint applied to the interior or exterior surfaces. Some paints introduced up until 1977 contained some level of lead. Regulations enforced by the Consumer Product Safety Commission banned the use of all but small amounts of lead in paints in 1978. However, manufacturers are still allowed to produce paints containing up to 600 parts per million lead.

If the paint which contains lead is in poor or damaged condition, persons working or living in the area can be exposed to small paint chips or lead-containing dust. Exposure can also result from construction, demolition, repair and refinish (sanding) operations or from the torch cutting or burning of painted materials.

Exposure to the lead can also occur as a result of hobbies or sports. Individuals who work with lead while making stained glass or while melting lead to make sinkers or bullets, or individuals that reload ammunition are all exposed to varying levels of lead.

### **Inspection Procedures**

#### ***Asbestos Sampling Procedures***

The asbestos survey was performed using the applicable portions of the currently recognized standard protocol developed for schools under AHERA, as promulgated in Title 40, Code of Federal Regulations (40 CFR), Part 763 and as amended in the Federal Register and as established in the Administrative Rules of Montana (ARM 17.74.354). Since the primary concern for this investigation was to identify potential asbestos hazards in the entire building, Northern representatives visually inspected existing conditions considering each construction, addition, or renovation date as separate, unique buildings, if applicable.

#### ***Laboratory Analysis of Bulk Asbestos Samples***

Bulk samples obtained during the inspection were assigned bulk sample numbers and entered on sample summary/chain-of-custody forms. The samples were transported to the laboratory by overnight courier under standard chain-of-custody procedures. The analysis was performed in accordance with EPA Method 600/R-93/116, which employs polarized light microscopic techniques with dispersion staining for identification of mineral forms of asbestos. The quantification of asbestos in the sample is intended to be an estimate only and the limit of detection for this method is approximately 1% by volume.

#### ***Lead-Based Paint Sampling Procedures***

#### **Lead-Based Paint Inspection Procedures**

The painted surfaces in this inspection were analyzed for the presence of lead using a portable X-ray fluorescence instrument (XRF) manufactured for paint analysis. Portable XRF instruments expose the painted surface(s) to X-rays that cause lead to fluoresce with a characteristic

Mrs. Beth Famiglietti  
301 W. Broadway St.  
Lewistown, Montana  
August 29, 2018  
Page 4

frequency. The intensity of this fluorescence is measured by the instrument's detector and is then converted into a number that represents the amount of lead in the paint per unit area (milligrams per square centimeter). The XRF instrument has the capability to analyze the lead content of multiple layers of paint at one time.

The XRF is the preferred method for measuring the lead level in paint. Laboratory analysis of paint-chip samples is recommended for components that cannot be tested using XRF instruments or to confirm inconclusive XRF results. Northern uses the XRF instrument manufactured by NITON Corporation. The instrument is calibrated prior to, following and periodically during each day of field-testing. All field data is stored electronically by the instrument and is recorded on field forms.

The person performing this XRF inspection has received specific training in the use and interpretation of data collected by this instrument, and is familiar with the radiation safety requirements and proper use of the device.

For labeling and definition purposes in this report, the term lead-based paint means paint or other surface coatings that contain lead at a concentration equal to or greater than 1.0 mg/cm<sup>2</sup> as measured using an XRF. This definition is utilized by the Department of Housing and Urban Development (HUD) and does not specifically apply to exposure concerns under the Occupational Safety and Health Administration (OSHA).

Because OSHA does not recognize a threshold of lead content in paint for personnel exposure concerns, the definition of lead-based paint in this report should be used only to discriminate paint with relatively high lead content from paint with relatively low lead content.

## **Inspection Findings**

### ***Asbestos***

A total of 21 building materials suspected to contain asbestos were identified in the structure.

All 21 materials were sampled following sample collection requirements outlined under the EPA, AHERA legislation and State of Montana regulations. Laboratory results revealed that one of the sampled materials contains greater than 1% asbestos. That material is:

F1.1 Vinyl Sheet Flooring – Tan with Large Pebble Pattern in room 103.

For additional information refer to Tables 1 and 2 and the attached laboratory report.

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

This inspection focused on identifying general painted building components on the interior and exterior of the building and performing testing of these components in various locations throughout the facility.

Twenty-eight painted interior and exterior building components were identified. Lead-based paint was detected on nine painted building components. Two building components are assumed to contain lead-based paint. The painted building components verified to contain lead-based paint are:

- L-1 Front Entry Vertical Slat Wall (Wood/White),
- L-2 Front Entry Window Casing (Wood/White),
- L-3 Front Entry Door Jamb (Wood/White),
- L-8 Display Window Wall (Wood/White),
- L-9 Display Window Ceiling (Wood/White),
- L-14 Single Pane 2 Panel Door (Wood/Red),
- L-15 Single Pane 2 Panel Door Jamb (Wood/Red),
- L-19 2<sup>nd</sup> Floor Window Sash (Wood/White), and
- L-22 Exterior Lower In-Lay (Wood/Tan).

The two building components that are assumed to contain lead-based paint are:

- L-27 Exterior 2<sup>nd</sup> Floor Window Casing (Wood/White), and
- L-28 Exterior 2<sup>nd</sup> Floor Window Sash (Wood/White).

Reference Table 3 for a description of identified painted building components and XRF test results.

### **Conclusions and Recommendations**

#### ***Asbestos***

Asbestos was confirmed to be present in one of the suspect materials. Due to the limited amount of asbestos containing material (<10ft<sup>2</sup>) and the fact that the material is not attached (glued) to the subfloor, if future renovation plans involve the removal of this asbestos-containing material Northern recommends that the material be wetted, double bagged and disposed of as asbestos containing waste.

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

Exposure to lead dust or fumes can result from construction, demolition, repair and refinish (sanding) operations or from the torch cutting or burning of painted materials. Five of the lead-based paint painted components identified or assumed at the facility are in deteriorated condition. These components should be cleaned and sealed or removed and replaced by an abatement company whose workers have received proper lead awareness training. The remaining six building components in intact condition should be noted in case renovation work causes an impact on their condition and becomes a hazard. If the identified intact lead-based paint painted component are impacted Northern recommends that the component or the paint be removed by an abatement company whose workers have received proper lead awareness training.

#### **Limitations**

This asbestos and lead-based paint inspection survey report was prepared based on information obtained during our on-site observations and interpretation of the XRF data as well as the laboratory results of bulk samples of building materials collected during the survey. The conclusions of this report are professional opinions based solely upon review of previously collected data, our visual site observations and interpretations of laboratory analyses and field data as described in our report.

Mrs. Beth Famiglietti  
301 W. Broadway St.  
Lewistown, Montana  
August 29, 2018  
Page 6

This report has been prepared to provide information concerning the various types and estimated quantities of asbestos-containing materials and lead-based paint painted building components present at this site. It includes only those materials that were visible and accessible at the time of our inspection. We did not remove any permanent building enclosures or disassemble any equipment.

This inspection and report is intended to identify asbestos-containing materials and lead-based paint building components. It is not intended to be used for the purpose of obtaining bids for its removal by abatement contractors. The scope of services performed by Northern may not be appropriate to satisfy the needs of other users, and any use or re-use of this document, or the findings presented herein, is at the sole risk of the user.

Our opinions are intended exclusively for use by WWC Engineering and the property owner. The opinions presented herein apply to the site conditions existing at the time of our investigation. Therefore, our opinions and recommendations may not apply to future conditions that may exist at the site that we have not had the opportunity to evaluate.

We trust this summary report provides sufficient information for planning purposes. We appreciate the opportunity to assist you and look forward to continuing to work with you.

If you have any questions or require additional information, please contact us.

It was a pleasure to assist you with this project. Please call if you have any questions on our report, or if you need any additional assistance.

Respectfully submitted,

NORTHERN INDUSTRIAL HYGIENE, INC.



Todd Schneider  
Environmental Scientist

Attachments:            Tables 1-3  
                                 Hazardous Material Location Drawing  
                                 Lead-Based Paint Photographs  
                                 Laboratory Analysis Report  
                                 Inspector Credentials  
                                 – Invoice

**TABLE 1**  
**SUMMARY OF MATERIALS SUSPECTED TO CONTAIN ASBESTOS**  
**AND LABORATORY RESULTS**  
**Commercial Building**  
**301 West Broadway**  
**Lewistown, Montana**

Material Number	Material Description	Friable (Y/N)	Sample Locations	Laboratory Results
<b>F1.1</b>	<b>Vinyl Sheet Flooring - Tan w/Small &amp; Large Pebble Pattern</b>	N	103	<b>15% Chrysotile</b>
F1.2	Vinyl Sheet Flooring - Gray Small Pebble Pattern w/Mastic	N	107	All Layers ND
F1.3	Vinyl Sheet Flooring - Tan Squares Pattern w/Mastic	N	107A	All Layers ND
F1.4	Vinyl Sheet Flooring - Small Squares	N	202A	ND
F2.1	12"x12" Floor Tile - White w/Gray Streaks w/Mastic	N	103, 107	All Layers ND
F6.1	Carpet - Gray w/Mastic	N	102, 107, 109	All Layers ND
M3.1	Gypsum Board Wall & Ceiling System	N	104, 107A, 111	All Layers ND
M5.1	2'x4' Lay-in Ceiling Panels - Rough Pinholes	Y	104, 105	ND
M6.1	12"x12" Ceiling Panels w/Tan Glue Pucks	Y	107A	All Layers ND
M6.2	2'x4' Ceiling Tiles - Mechanically Attached	Y	001 Basement	ND
M7.1	Plaster Wall & Ceiling	N	103, 201, 202A	ND
M8.1	Interior Window Glazing	N	108, 201 (Windows)	ND
M8.2	Exterior Window Glazing	N	Exterior Windows	ND

NS = Material Not Sampled  
 ND = No Asbestos Detected

Confirmed Asbestos-Containing Materials Shown in Bold Type

Table 1

**TABLE 1**  
**SUMMARY OF MATERIALS SUSPECTED TO CONTAIN ASBESTOS**  
**AND LABORATORY RESULTS**  
**Commercial Building**  
**301 West Broadway**  
**Lewistown, Montana**

<b>Material Number</b>	<b>Material Description</b>	<b>Friable (Y/N)</b>	<b>Sample Locations</b>	<b>Laboratory Results</b>
M12.1	6" Vinyl Cove Base - Blue w/Glue	N	103, 107, 107A	All Layers ND
M14.1	Concrete w/ Coating	N	113, 202, 001 Basement	All Layers ND
M14.2	Exterior Concrete	N	Exterior	ND
M16.1	Brick	N	Exterior Basement Stairs	ND
M16.2	Brick Mortar	N	Exterior Basement Stairs	ND
M20.1	Exterior Block	N	Exterior Wall	ND
M20.2	Exterior Block Mortar	N	Exterior Wall	ND
S1.1	Spiral Wall Texture	Y	107, 108	ND

NS = Material Not Sampled  
 ND = No Asbestos Detected

Confirmed Asbestos-Containing Materials Shown in Bold Type

Table 1



**TABLE 2  
SUMMARY OF CONFIRMED OR ASSUMED ASBESTOS-CONTAINING MATERIALS  
AND RECOMMENDED RESPONSE ACTION**

**Commercial Building  
301 West Broadway  
Lewistown, Montana**

Material Number	Material Description	NESHAP Category	Recommended Response Action
F1.1	Vinyl Sheet Flooring - Tan w/Small & Large Pebble Pattern	I	Since the quantity of ACM is below the State of Montana regulated amount (<10ft <sup>2</sup> ), this material should be wetted prior to removal, double bagged and disposed of as an asbestos containing waste.

Category I	Nonfriable ACM such as packings, gaskets, resilient floor covering, and asphalt roofing products.
Category II	All nonfriable ACM, excluding Category I materials.
RACM	Friable ACM; Category I material that has become friable; Category I material that will be subjected to sanding, grinding, cutting, or abrading; or Category II, material that has a high probability of becoming friable.

**TABLE 3**  
**IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS**  
**Commercial Building**  
**301 West Broadway St.**  
**Lewistown, Montana**

<b>Material Number</b>	<b>Building Component</b>	<b>Substrate</b>	<b>Color</b>	<b>Material Condition</b>	<b>XRF Result mg/cm<sup>2</sup></b>	<b>Result</b>
L-1	<b>Front Entry Vertical Slat Wall</b>	Wood	White	Intact	10	Positive
L-2	<b>Front Entry Window Casing</b>	Wood	White	Intact	8.8	Positive
L-3	<b>Front Entry Door Jamb</b>	Wood	White	Intact	6.7	Positive
L-4	Round Metal Post	Metal	White	Intact	0.4	Negative
L-5	Plaster Wall	Plaster	White	Deteriorated	0.23	Negative
L-6	Display Window Sill	Wood	White	Intact	0	Negative
L-7	Gypsum Board Walls and Ceilings	Gypsum Board	Various	Deteriorated	0	Negative
L-8	<b>Display Window Wall</b>	Wood	White	Deteriorated	1.5	Positive
L-9	<b>Display Window Ceiling</b>	Wood	White	Intact	1.8	Positive

- \* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm<sup>2</sup> measured using XRF screening.
- \* Neg = Nonlead-based paint - less than 1.0 mg/cm<sup>2</sup> measured using XRF screening.
- \*\* Reference photographs and drawings for locations of confirmed or assumed materials.

Confirmed and Assumed Lead Based Paint Shown in Bold Type

**TABLE 3**  
**IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS**  
**Commercial Building**  
**301 West Broadway St.**  
**Lewistown, Montana**

Material Number	Building Component	Substrate	Color	Material Condition	XRF Result mg/cm <sup>2</sup>	Result
L-10	Door to Display Window No Glass	Wood	White	Intact	0.02	Negative
L-11	Door to Display Window 6 Pane	Wood	White	Intact	0.1	Negative
L-12	Door to Display Window 1 Pane	Wood	Peach	Intact	0.12	Negative
L-13	Wall with Spiral Texture	Wood	White/Red	Deteriorated	0	Negative
L-14	<b>Single Pane 2 Panel Door</b>	<b>Wood</b>	<b>Red</b>	<b>Intact</b>	<b>3.1</b>	<b>Positive</b>
L-15	<b>Single Pane 2 Panel Door Jamb</b>	<b>Wood</b>	<b>Red</b>	<b>Deteriorated</b>	<b>8.4</b>	<b>Positive</b>
L-16	Square Column 2nd Floor	Wood	Yellow	Deteriorated	0.04	Negative
L-17	2nd Floor Window Sill	Wood	White	Deteriorated	0.24	Negative
L-18	2nd Floor Window Casing	Wood	White	Deteriorated	0.27	Negative

\* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm<sup>2</sup> measured using XRF screening.

\* Neg = Nonlead-based paint - less than 1.0 mg/cm<sup>2</sup> measured using XRF screening.

\*\* Reference photographs and drawings for locations of confirmed or assumed materials.

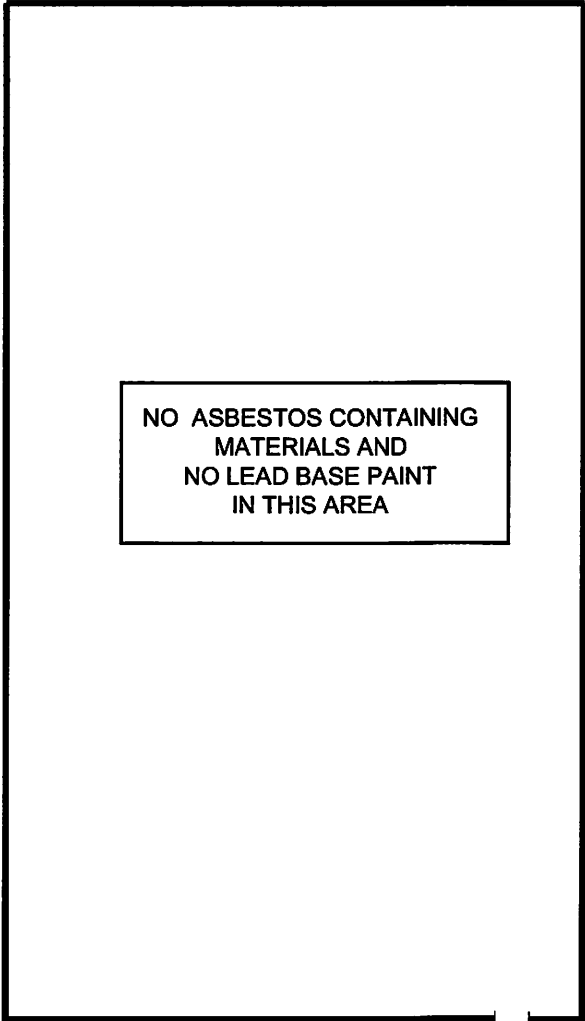
Confirmed and Assumed Lead Based Paint Shown in Bold Type

**TABLE 3**  
**IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS**  
**Commercial Building**  
**301 West Broadway St.**  
**Lewistown, Montana**

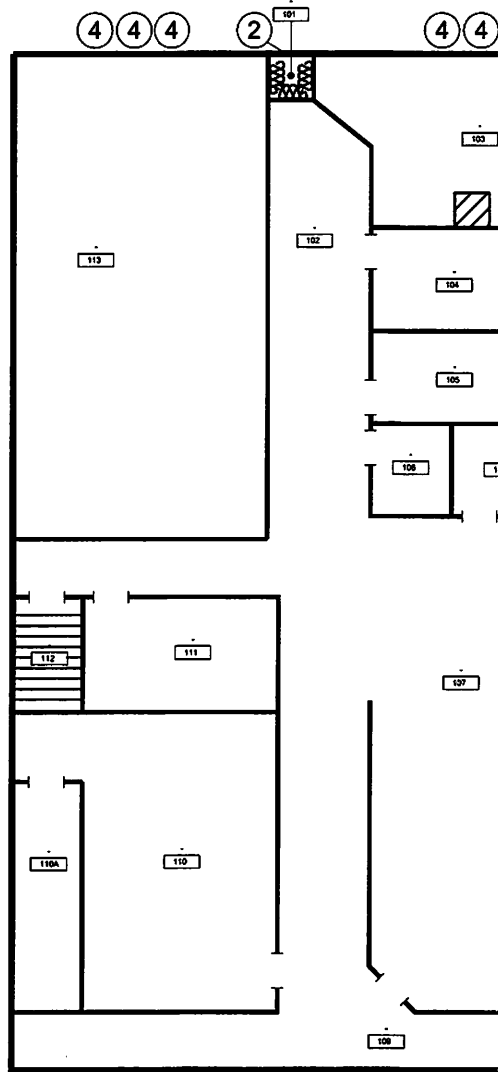
Material Number	Building Component	Substrate	Color	Material Condition	XRF Result mg/cm <sup>2</sup>	Result
L-19	2nd Floor Window Sash	Wood	White	Deteriorated	4	Positive
L-20	2nd Floor Window Stop	Wood	White	Deteriorated	0.2	Negative
L-21	Exterior Trim	Wood	Red	Intact	0	Negative
L-22	Exterior Lower Inlay	Wood	Tan	Intact	3.4	Positive
L-23	Painted Exterior Window	Glass	Tan	Intact	0	Negative
L-24	Basement Column	Plaster	Green	Intact	0.02	Negative
L-25	Basement Column	Concrete	Green	Intact	0.04	Negative
L-26	"I" Beam	Metal	Brown	Intact	0.22	Negative
L-27	Exterior 2nd Floor Window Casing	Wood	White	Deteriorated	Assumed	Positive
L-28	Exterior 2nd Floor Window Sash	Wood	White	Deteriorated	Assumed	Positive

- \* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm<sup>2</sup> measured using XRF screening.
- \* Neg = Nonlead-based paint - less than 1.0 mg/cm<sup>2</sup> measured using XRF screening.
- \*\* Reference photographs and drawings for locations of confirmed or assumed materials.

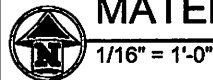
Confirmed and Assumed Lead Based Paint Shown in Bold Type



**BASEMENT MATERIAL LOCATION DIAGRAM**



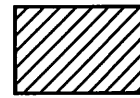
**FIRST FLOOR MATERIAL LOCATION DIA**



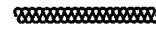
DATE: AUG 2018  
 DRAWN BY: JMT  
 CHK BY: MAO  
 CAD FILE: NIH REF.

PROJECT NAME: 301 WEST BROA  
 ADDRESS: LEWISTOWN, MT  
 NIH PROJECT NUMBER: 999-3727

## GRAPHIC LEGEND



VINYL SHEET FLOORING  
15% CHRYSOTILE



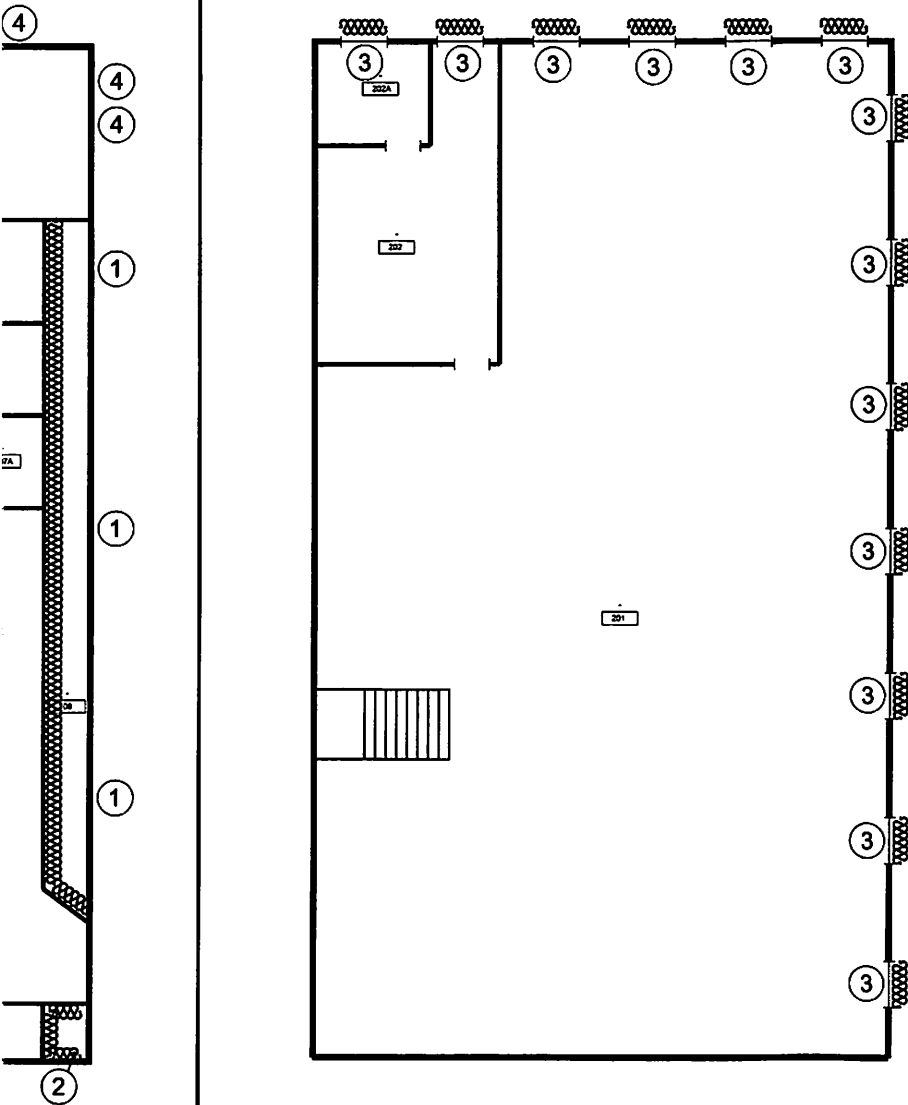
LEAD BASE PAINT

## KEYNOTES

- ① LEAD BASED PAINT ON INTERIOR WALL AND CEILING OF DISPLAY WINDOW.
- ② LEAD BASED PAINT ON WALLS AND INTERIOR DOOR AND WINDOW CASINGS OF ENTRYWAY.
- ③ LEAD BASED PAINT ON 2ND FLOOR INTERIOR WINDOW SASH AND ASSUMED ON INACCESSIBLE EXTERIOR 2ND FLOOR WINDOW CASING AND SASH.
- ④ LEAD BASED PAINT ON EXTERIOR WOOD INLAY BELOW PICTURE WINDOWS.

## SHEET NOTES

1. ASSUMED LEAD BASED PAINT ON 2ND FLOOR EXTERIOR WINDOW CASING AND SASH (INACCESSIBLE)



## SECOND FLOOR MATERIAL LOCATION DIAGRAM



1/16" = 1'-0"

GRAM

DWAY

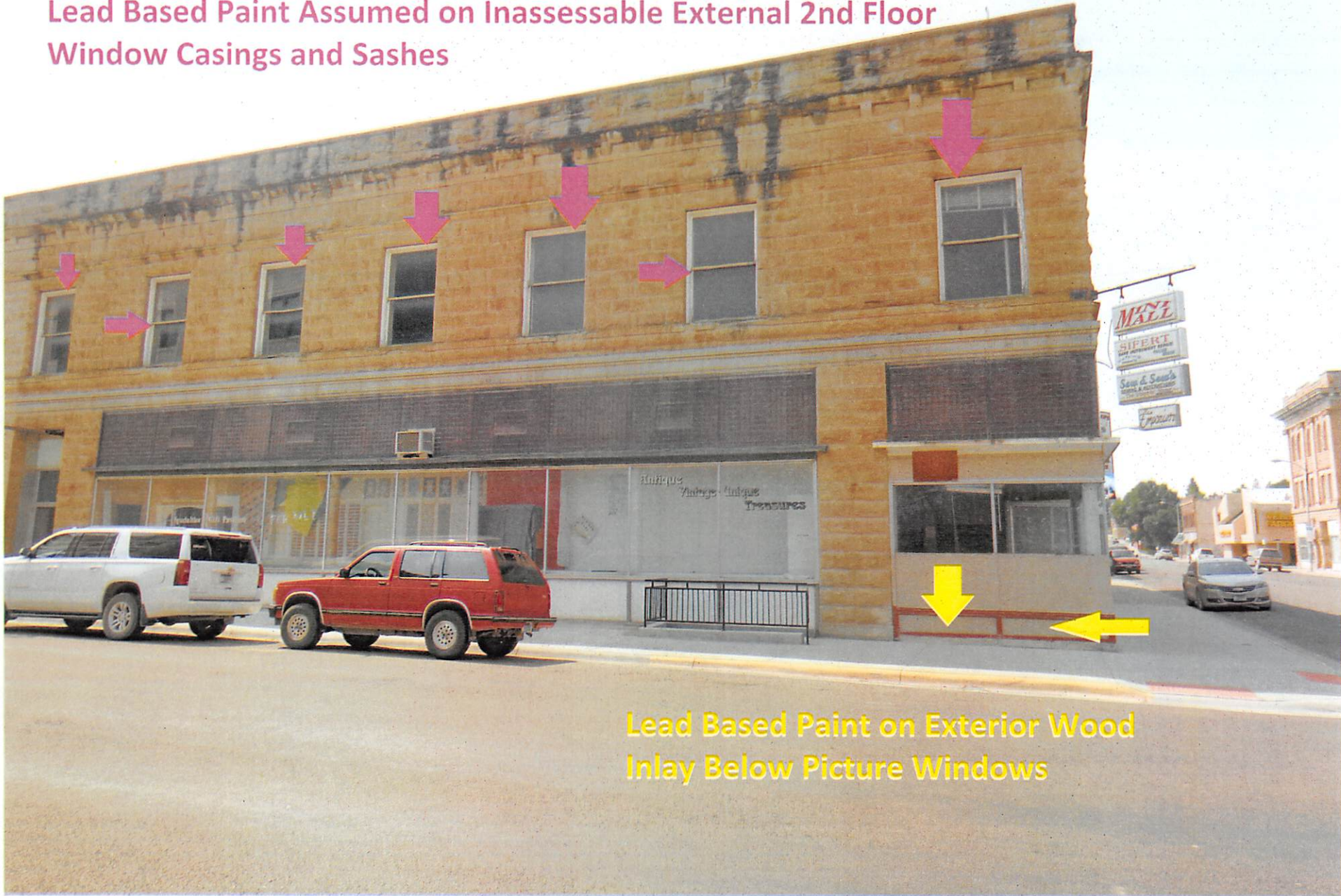
FIG. 1.0  
BASEMENT, FIRST FLOOR AND SECOND FLOOR  
MATERIAL LOCATION DIAGRAM



Lead Based Paint Assumed on Inaccessable 2nd Floor Window Casings and Sashes

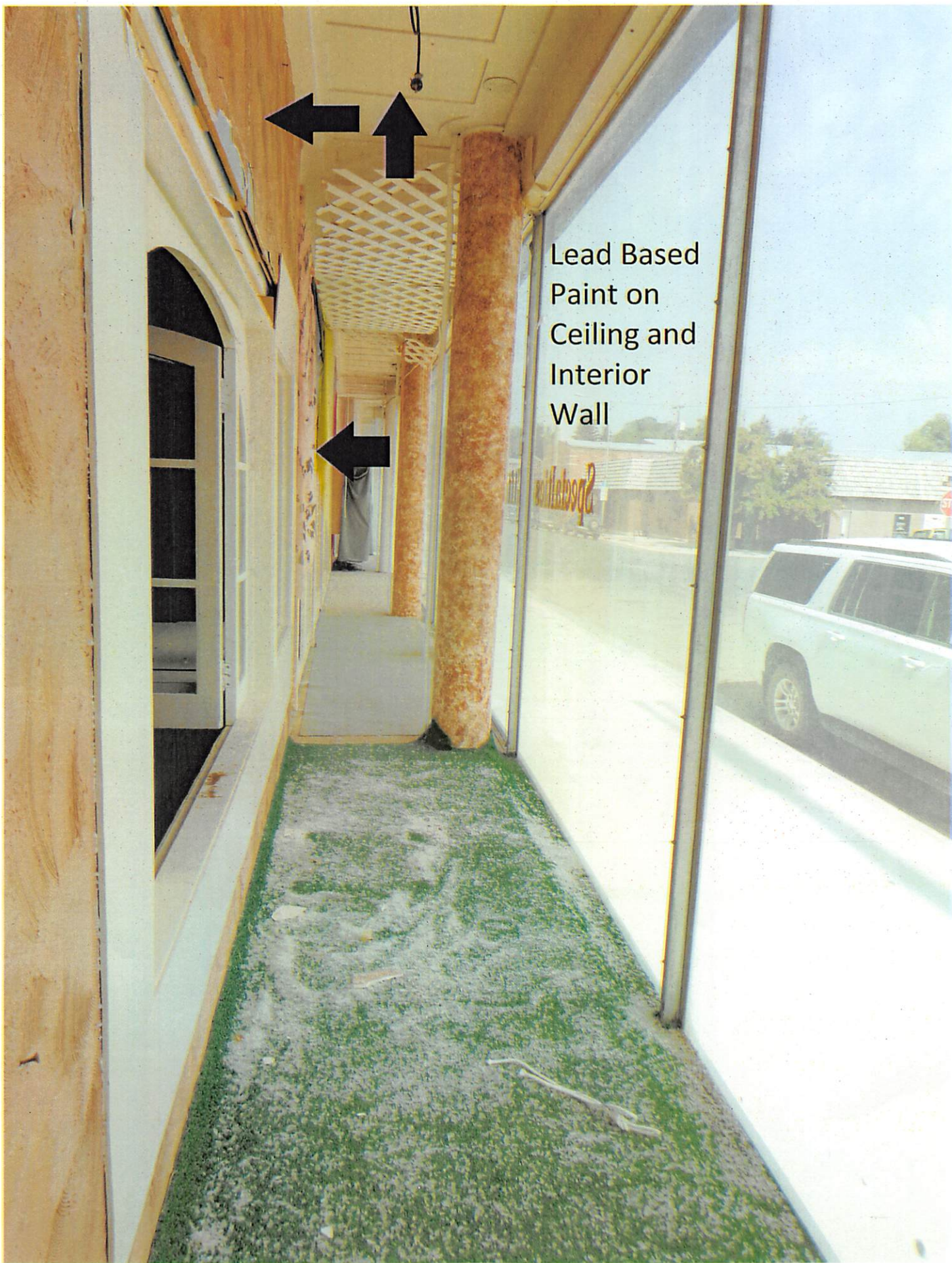
Lead Based Paint on Exterior Wood Inlay Below Picture Windows

**Lead Based Paint Assumed on Inaccessible External 2nd Floor Window Casings and Sashes**



**Lead Based Paint on Exterior Wood Inlay Below Picture Windows**





Lead Based  
Paint on  
Ceiling and  
Interior  
Wall



Lead Based Paint on all Entryway Wood Components.



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EMSL Order: 121805323  
Customer ID: NIHI62  
Customer PO:  
Project ID:

**Attention:** Todd Schneider  
Northern Industrial Hygiene, Inc.  
201 South 30th Street  
Billings, MT 59101

**Phone:** (406) 245-7766  
**Fax:** (406) 254-1428  
**Received Date:** 08/17/2018 9:20 AM  
**Analysis Date:** 08/24/2018  
**Collected Date:** 08/25/2018

**Project:** 301 W. Broadway Lewistown / 999-3727

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
F1.1A <small>121805323-0001</small>	Vinyl Sheet Flooring Tan Small & Large Pebble	Beige Fibrous Heterogeneous	4% Cellulose	81% Non-fibrous (Other)	15% Chrysotile
F1.1B <small>121805323-0002</small>	Vinyl Sheet Flooring Tan Small & Large Pebble				Positive Stop (Not Analyzed)
F1.1C <small>121805323-0003</small>	Vinyl Sheet Flooring Tan Small & Large Pebble				Positive Stop (Not Analyzed)
F1.2A-Vinyl <small>121805323-0004</small>	Vinyl Sheet Flooring Gray Small Pebble	Gray Fibrous Heterogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
F1.2A-Mastic <small>121805323-0004A</small>	Vinyl Sheet Flooring Gray Small Pebble	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.2B-Vinyl <small>121805323-0005</small>	Vinyl Sheet Flooring Gray Small Pebble	Gray Fibrous Heterogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
F1.2B-Mastic <small>121805323-0005A</small>	Vinyl Sheet Flooring Gray Small Pebble	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.2C-Vinyl <small>121805323-0006</small>	Vinyl Sheet Flooring Gray Small Pebble	Gray Fibrous Heterogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
F1.2C-Mastic <small>121805323-0006A</small>	Vinyl Sheet Flooring Gray Small Pebble	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.3A-Vinyl <small>121805323-0007</small>	Vinyl Sheet Flooring Tan Squares	Beige Fibrous Heterogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
F1.3A-Mastic <small>121805323-0007A</small>	Vinyl Sheet Flooring Tan Squares	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.3B-Vinyl <small>121805323-0008</small>	Vinyl Sheet Flooring Tan Squares	Beige Fibrous Heterogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
F1.3B-Mastic <small>121805323-0008A</small>	Vinyl Sheet Flooring Tan Squares	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.3C-Vinyl <small>121805323-0009</small>	Vinyl Sheet Flooring Tan Squares	Beige Fibrous Heterogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
F1.3C-Mastic <small>121805323-0009A</small>	Vinyl Sheet Flooring Tan Squares	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F1.4A <small>121805323-0010</small>	Vinyl Sheet Flooring Small Squares	Various Fibrous Heterogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected

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EMSL Order: 121805323

Customer ID: NIHI62

Customer PO:

Project ID:

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
F1.4B 121805323-0011	Vinyl Sheet Flooring Small Squares	Various Fibrous Heterogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
F1.4C 121805323-0012	Vinyl Sheet Flooring Small Squares	Various Fibrous Heterogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
F2.1A-Floor Tile 121805323-0013	12x12 Floor Tile White W/ Gray Streaks	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1A-Mastic 121805323-0013A	12x12 Floor Tile White W/ Gray Streaks	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1B-Floor Tile 121805323-0014	12x12 Floor Tile White W/ Gray Streaks	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1B-Mastic 121805323-0014A	12x12 Floor Tile White W/ Gray Streaks	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1C-Floor Tile 121805323-0015	12x12 Floor Tile White W/ Gray Streaks	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1C-Mastic 121805323-0015A	12x12 Floor Tile White W/ Gray Streaks	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1A-Carpet 121805323-0016	Carpet Thin Gray	Brown Fibrous Heterogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1A-Mastic 121805323-0016A	Carpet Thin Gray	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1B-Carpet 121805323-0017	Carpet Thin Gray	Brown Fibrous Heterogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1B-Mastic 121805323-0017A	Carpet Thin Gray	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1C-Carpet 121805323-0018	Carpet Thin Gray	Brown Fibrous Homogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1C-Mastic 121805323-0018A	Carpet Thin Gray	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M3.1A-Tape 121805323-0019	Gypsum Board Wall & Ceiling System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1A-Joint Compound 121805323-0019A	Gypsum Board Wall & Ceiling System	White Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
M3.1A-Gypsum Board 121805323-0019B	Gypsum Board Wall & Ceiling System	Brown/White Fibrous Heterogeneous	10% Cellulose 2% Glass	85% Gypsum 3% Non-fibrous (Other)	None Detected
M3.1B-Tape 121805323-0020	Gypsum Board Wall & Ceiling System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1B-Joint Compound 121805323-0020A	Gypsum Board Wall & Ceiling System	White Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected

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EMSL Order: 121805323

Customer ID: NIHIG2

Customer PO:

Project ID:

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
M3.1B-Gypsum Board <i>121805323-0020B</i>	Gypsum Board Wall & Ceiling System	Brown/White Fibrous Heterogeneous	10% Cellulose 2% Glass	85% Gypsum 3% Non-fibrous (Other)	None Detected
M3.1C-Tape <i>121805323-0021</i>	Gypsum Board Wall & Ceiling System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1C-Joint Compound <i>121805323-0021A</i>	Gypsum Board Wall & Ceiling System	White Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
M3.1C-Gypsum Board <i>121805323-0021B</i>	Gypsum Board Wall & Ceiling System	Brown/White Fibrous Heterogeneous	10% Cellulose 2% Glass	85% Gypsum 3% Non-fibrous (Other)	None Detected
M5.1A <i>121805323-0022</i>	2'x4' Lay-In Ceiling Panels Rough Pin	Gray/White Fibrous Heterogeneous	70% Cellulose 10% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M5.1B <i>121805323-0023</i>	2'x4' Lay-In Ceiling Panels Rough Pin	Gray/White Fibrous Heterogeneous	70% Cellulose 10% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M5.1C <i>121805323-0024</i>	2'x4' Lay-In Ceiling Panels Rough Pin	Gray/White Fibrous Heterogeneous	70% Cellulose 10% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M6.1A-Ceiling Tile <i>121805323-0025</i>	12"x12" Ceiling Panels W/ Tan Puck	Tan/White Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.1A-Puck <i>121805323-0025A</i>	12"x12" Ceiling Panels W/ Tan Puck	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M6.1B-Ceiling Tile <i>121805323-0026</i>	12"x12" Ceiling Panels W/ Tan Puck	Tan/White Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.1B-Puck <i>121805323-0026A</i>	12"x12" Ceiling Panels W/ Tan Puck	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M6.1C-Ceiling Tile <i>121805323-0027</i>	12"x12" Ceiling Panels W/ Tan Puck	Tan/White Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.1C-Puck <i>121805323-0027A</i>	12"x12" Ceiling Panels W/ Tan Puck	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M6.2A <i>121805323-0028</i>	2'x4' Ceiling Tiles Mech Attached	Brown/Beige Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.2B <i>121805323-0029</i>	2'x4' Ceiling Tiles Mech Attached	Brown/Beige Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.2C <i>121805323-0030</i>	2'x4' Ceiling Tiles Mech Attached	Brown Fibrous Homogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M7.1A <i>121805323-0031</i> <i>Paint excluded.</i>	Plaster Wall & Ceiling	Beige Fibrous Homogeneous	<1% Hair	100% Non-fibrous (Other)	None Detected
M7.1B <i>121805323-0032</i> <i>Paint excluded.</i>	Plaster Wall & Ceiling	Beige Fibrous Homogeneous	<1% Hair	100% Non-fibrous (Other)	None Detected

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EMSL Order: 121805323  
 Customer ID: NIHI62  
 Customer PO:  
 Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
M7.1C <i>121805323-0033</i> <i>Paint excluded.</i>	Plaster Wall & Ceiling	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.1A <i>121805323-0034</i>	Interior Window Glazing	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.1B <i>121805323-0035</i>	Interior Window Glazing	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.1C <i>121805323-0036</i>	Interior Window Glazing	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.2A <i>121805323-0037</i>	Exterior Window Glazing	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.2B <i>121805323-0038</i>	Exterior Window Glazing	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M8.2C <i>121805323-0039</i>	Exterior Window Glazing	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1A-Cove Base <i>121805323-0040</i>	6" Vinyl Cove Base Blue	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1A-Glue 1 <i>121805323-0040A</i>	6" Vinyl Cove Base Blue	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1A-Glue 2 <i>121805323-0040B</i>	6" Vinyl Cove Base Blue	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1B-Cove Base <i>121805323-0041</i>	6" Vinyl Cove Base Blue	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1B-Glue <i>121805323-0041A</i>	6" Vinyl Cove Base Blue	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1C-Cove Base <i>121805323-0042</i>	6" Vinyl Cove Base Blue	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M12.1C-Glue <i>121805323-0042A</i>	6" Vinyl Cove Base Blue	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1A-Coating <i>121805323-0043</i>	Concrete	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1A-Concrete <i>121805323-0043A</i>	Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1B-Concrete 1 <i>121805323-0044</i>	Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1B-Concrete 2 <i>121805323-0044A</i>	Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

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EMSL Order: 121805323  
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**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
M14.1C-Coating <i>121805323-0045</i> <i>Jim: Six of one, really.</i>	Concrete	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1C-Concrete <i>121805323-0045A</i>	Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2A <i>121805323-0046</i>	Exterior Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2B <i>121805323-0047</i>	Exterior Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2C <i>121805323-0048</i>	Exterior Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.1A <i>121805323-0049</i>	Exterior Block	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.1B <i>121805323-0050</i>	Exterior Block	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.1C <i>121805323-0051</i>	Exterior Block	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.2A <i>121805323-0052</i>	Mortar In Exterior Block	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.2B <i>121805323-0053</i>	Mortar In Exterior Block	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M20.2C <i>121805323-0054</i>	Mortar In Exterior Block	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
S1.1A <i>121805323-0055</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
S1.1B <i>121805323-0056</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
S1.1C <i>121805323-0057</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
S1.1D <i>121805323-0058</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
S1.1E <i>121805323-0059</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
S1.1F <i>121805323-0060</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected

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EMSL Order: 121805323  
 Customer ID: NIHI62  
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 Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
S1.1G <i>121805323-0061</i> <i>Paint excluded.</i>	Spiral Wall Texture	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
M16.1A <i>121805323-0062</i>	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.1B <i>121805323-0063</i>	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.1C <i>121805323-0064</i>	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2A <i>121805323-0065</i>	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2B <i>121805323-0066</i>	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2C <i>121805323-0067</i>	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)

Isai Portillo (28)  
 Jillian Chesson (26)  
 Jacob Markey (26)  
 Lindsay Rye (13)

*Michelle Wilson*

Michelle Wilson, Laboratory Manager  
 or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Phoenix, AZ NVLAP Lab Code 200811-0, AZ0937

Initial report from: 08/24/2018 14:38:49





EMSL ANALYTICAL, INC.  
LABORATORY PRODUCTS TRAINING

## Asbestos Bulk Building Material Chain of Custody

EMSL Order Number (Lab Use Only):

121805323

EMSL ANALYTICAL, INC.  
3356 W. CATALINA DRIVE  
PHOENIX, AZ 85017  
PHONE: 602-276-4344  
FAX: 602-276-4053

Company : Northern Industrial Hygiene		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different <small>If Bill to is Different note instructions in Comments**</small>	
Street: 201 S. 30 <sup>th</sup> Street		<i>Third Party Billing requires written authorization from third party</i>	
City: Billings	State/Province: MT	Zip/Postal Code: 59101	Country: USA
Report To (Name): Todd Schneider		Telephone #: 406-245-7766	
Email Address: tschneider@northernih.com		Fax #: 406-254-1428	Purchase Order:
Project Name/Number: 201 S. Broadway Lewistown/999-7727		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
U.S. State Samples Taken: MT		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

**Turnaround Time (TAT) Options\* - Please Check**

3 Hour   
  6 Hour   
  24 Hour   
  48 Hour   
  72 Hour   
  96 Hour   
  1 Week   
  2 Week

\*For TEM Air 3 hr through 6 hr, please call ahead to schedule. \*There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

PLM - Bulk (reporting limit)	TEM - Bulk
<input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)	<input type="checkbox"/> TEM EPA NOB - EPA 600/R-93/116 Section 2.5.5.1
<input type="checkbox"/> PLM EPA NOB (<1%)	<input type="checkbox"/> NY ELAP Method 198.4 (TEM)
Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)	<input type="checkbox"/> Chatfield Protocol (semi-quantitative)
Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)	<input type="checkbox"/> TEM % by Mass - EPA 600/R-93/116 Section 2.5.5.2
<input type="checkbox"/> NIOSH 9002 (<1%)	<input type="checkbox"/> TEM Qualitative via Filtration Prep Technique
<input type="checkbox"/> NY ELAP Method 198.1 (friable in NY)	<input type="checkbox"/> TEM Qualitative via Drop Mount Prep Technique
<input type="checkbox"/> NY ELAP Method 198.6 NOB (non-friable-NY)	<b>Other</b>
<input type="checkbox"/> OSHA ID-191 Modified	<input type="checkbox"/>
<input type="checkbox"/> Standard Addition Method	

Check For Positive Stop - Clearly Identify Homogenous Group      Date Sampled: 8-14-18

Samplers Name: Todd Schneider      Samplers Signature: *Todd Schneider*

Sample #	HA #	Material Description	Sample Location
F1.1A	F1.1	vinyl sheet flooring Tan small & large pebble	103
B	L	L	L
C	L	L	L
F1.2A	F1.2A	vinyl sheet flooring Gray small pebble	107
B	L	L	L
C	L	L	L
F1.3A	F1.3	vinyl sheet flooring Tan squares	107A
B	L	L	L
C	L	L	L

Client Sample # (s): F1.1A -> M16.2C      Total # of Samples: 67

Relinquished (Client): *Todd Schneider*      Date: 8-15-18      Time: 12:00 pm

Received (Lab): *[Signature]*      Date: ~~8/14~~ 8/17/18      Time: 9:20

Comments/Special Instructions: 7955 4385 6014



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Additional Pages of the Chain of Custody are only necessary if needed for additional sample information

Sample #	HA #	Material Description	Sample Location
F1.4A	F1.4	Vinyl sheet flooring small squares	202A
B	↓	↓ ↓ ↓	↓
C	↓	↓ ↓ ↓	↓
F2.1A	F2.1	12x12 floor tile white w/Gray streaks	103
B	↓	↓ ↓ ↓	107
C	↓	↓ ↓ ↓	107
F6.1A	F6.1	Carpet thin Gray	102
B	↓	↓ ↓ ↓	107
C	↓	↓ ↓ ↓	109
M3.1A	M3.1	Gypsum board wall + ceiling system	104
B	↓	↓ ↓ ↓	107A
C	↓	↓ ↓ ↓	111
M5.1A	M5.1	2'x4' Lay-in ceiling panels Rough pin	104
B	↓	↓ ↓ ↓	104
C	↓	↓ ↓ ↓	105
M6.1A	M6.1	12"x12" ceiling panels w/Tan pack	107A
B	↓	↓ ↓ ↓	↓
C	↓	↓ ↓ ↓	↓
M6.2A	M6.2	2'x4' ceiling tiles mech attached	001 Basement
B	↓	↓ ↓ ↓	↓ ↓
C	↓	↓ ↓ ↓	↓ ↓
M7.1A	M7.1	Plaster wall + ceiling	<del>103</del> 103
B	↓	↓ ↓ ↓	201
C	↓	↓ ↓ ↓	202A

\*Comments/Special Instructions:



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Sample #	HA #	Material Description	Sample Location
M8.1A	M8.1	Interior window glazing	108 windows
B	⊥	⊥ ⊥ ⊥	201 ⊥
C	⊥	⊥ ⊥ ⊥	201 ⊥
M8.2A	M8.2	Exterior Window Glazing	Exterior windows
B	⊥	⊥ ⊥	⊥ ⊥
C	⊥	⊥ ⊥	⊥ ⊥
M12.1A	M12.1	6" vinyl cove base Blue	103
B	⊥	⊥ ⊥ ⊥	107
C	⊥	⊥ ⊥ ⊥	107A
M14.1A	M14.1	<del>Basement</del> concrete	113
B	⊥	⊥ ⊥	202
C	⊥	⊥ ⊥	001 Basement
M14.2A	M14.2	Exterior Concrete	Exterior
B	⊥	⊥ ⊥	⊥
C	⊥	⊥ ⊥	⊥
M20.1A	M20.1	Exterior Block	Exterior wall
B	⊥	⊥ ⊥	⊥
C	⊥	⊥ ⊥	⊥
M20.2A	M20.2	Mortar in Exterior Block	Exterior
B	⊥	⊥ ⊥ ⊥	⊥
C	⊥	⊥ ⊥ ⊥	⊥
S1.1A	S1.1	Spiral wall texture	107
B	⊥	⊥ ⊥	107
C	⊥	⊥ ⊥	108
*Comments/Special Instructions:			



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Sample #	HA #	Material Description	Sample Location
S1.1 D	S1.1	Spiral wall texture	108
E	I	I	108
F	I	I	110
G	I	I	110
M16.1A	M16.1	Brick	Ⓟ Exterior Basement stairs
B	I	I	I
C	I	I	I
M16.2A	M16.2	Mortar	I
B	I	I	I
C	I	I	I
*Comments/Special Instructions:			

**TODD SCHNEIDER**

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-5179**

Asbestos Inspector  
Project Contractor/Supervisor

12/06/2018  
03/02/2019

MT DEQ Asbestos Control Program

# United States Environmental Protection Agency

This is to certify that



Todd A Schneider

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

Risk Assessor

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires June 19, 2021

LBP-R-1185949-1

Certification #

June 05, 2018

Issued On



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

Adrienne Priselac, Manager, Toxics Office

Land Division

# **Appendix C**

## **Site Photos**

**(General, PCBs, Mercury, and Mold  
Inspection Photos)**





**Site Photos (General, PCBs, Mercury, and Mold Inspection Photos)**



Evidence of water intrusion in basement: no mold observed.



Evidence of water intrusion in basement: no mold observed.



Debris pile in basement: Electronic ballasts observed.



Debris pile in basement: Electronic ballasts observed.

## Site Photos (General, PCBs, Mercury, and Mold Inspection Photos)



Lighting fixture in basement with presumed leaky PCB ballast.



Lighting fixture in basement with presumed leaky PCB ballast.  
Note engraved ballast label.



Lighting fixture in basement with presumed leaky PCB ballast.  
Note sheen indicative of a leak.



Lighting fixture in basement with presumed PCB ballast.

## Site Photos (General, PCBs, Mercury, and Mold Inspection Photos)



Lighting fixture in basement with presumed PCB ballast.



Lighting fixture in basement with presumed PCB ballast.



Lighting fixture in basement with presumed PCB ballast.



Three rows of similar lighting fixtures on main level.

## Site Photos (General, PCBs, Mercury, and Mold Inspection Photos)



Fixture labeling on main floor.



No PCB's labeling observed on a couple ballasts on main level.



Thermostat on main level with mercury element not observed.