
PHASE II ENVIRONMENTAL SITE ASSESSMENT

"BIEGELS BAR PROPERTY": 19TH CENTRAL AVENUE SOUTH, HARLOWTON, MT 59036

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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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
OSHA	Occupational Safety and Health Administration
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 “Biegels Bar Property” at 19 Central Avenue South, Harlowton, Montana 59036 (subject property). The property is currently owned by the Steve Olson. The City of Harlowton (City), which owns the adjacent building, is interested in acquiring the subject property for redevelopment purposes. The 0.075-acre parcel has the following legal description: GRAVES SECOND ADD (HARLOWTON), SECTION 22, TOWNSHIP 08 N, RANGE 15 E, BLOCK 026, LOT 005, LOT 5 in Wheatland County, Harlowton, Montana (Appendix A, Figure 1).

Phase II ESA fieldwork was conducted on September 27, 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, mercury containing equipment, and for the presence/absence of mold. 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 17 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 2% chrysotile (asbestos). However, a composite sample of the wallboard system (all wallboard system layers) is less than 1% and therefore is not regulated by the EPA. Occupational Safety and Health Administration (OSHA) rules are still applicable. Asbestos is considered a COC due to handling and disposal considerations.

Lead-Based Paint (LBP)

Of the 26 X-ray fluorescence (XRF) readings collected, a total of eight readings were determined to be “positive” (>1 milligrams per square centimeter [mg/cm²]) for lead. Table 1 indicates the locations of identified LBP. Second floor window casings were inaccessible but are assumed to contain LBP. Sections 6.0, 7.0, and Appendix B of this report provide additional details of the lead inspection.

Table 1: LBP Locations, Material / Color, and Estimated Extent

Location	Material / Current Surface Paint Color	Estimated Extent (square feet)
Basement Storage Support Beam	Wood / Red	3
Riser of Basement Stairs	Wood / Gray	54
Exterior Window Casing	Wood / White	28
Exterior 2nd Floor Window Casing*	Gray	
Front Exterior	Concrete / Various	250
Door Jamb to Basement	Wood / Green	18
Door Casing to Basement Stairs	Wood / Black	
Rear Entry Interior Door Casing	Wood / Gray	18
Rear Entry Exterior Door Casing	Wood / White	

**Inaccessible during inspection. Assumed to contain lead.*

Based on the XRF results, elevated lead concentrations are present on door components, window components, stair components, a support “beam”, 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 a COC due to handling and disposal considerations.

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:

- No PCB-containing ballasts were identified. PCBs are not considered COCs.
- One thermostat switch was observed. The thermostat appears to contain a mercury component. Mercury is considered a COC.

- Mold was observed on wood in the basement near the former coolers and the ceiling of the main floor. Mold is 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 and LBP was confirmed to be present in eight building material components. Should demolition occur, the building should be kept adequately wet during demolition activities. Under the adequately wet provision, the wall board system (less than 1% asbestos) and LBP building materials do not have to be removed prior to demolition; however, removal by trained individuals before demolition is generally considered more protective. It is recommended that the demolition contractor contact landfills before beginning work to determine their policies for accepting related wastes. It is possible that TCLP samples for LBP will be required for off-site disposal. The disposal facility should be contacted to determine the appropriate TCLP procedure.
- The observed mercury-containing thermostat switch should be properly removed, prior to relevant demolition activities, and properly disposed of.
- If PCB-containing equipment is encountered, although none were observed, they should be properly removed prior to relevant demolition activities, and properly disposed of.
- As the presence of mold was noted, precautionary measures are recommended during remediation or demolition activities.

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 Harlowton, 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 Owner (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 a project meeting, 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 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 19 Central Avenue South, Harlowton, Montana 59036 and is currently owned by Steve Olson. The current legal description of the 0.075-acre subject property located in Wheatland County, Harlowton, Montana is:

GRAVES SECOND ADD (HARLOWTON), SECTION 22, TOWNSHIP 08 N, RANGE 15 E, BLOCK 026, LOT 005, LOT 5.

The subject property is generally bound by Central Avenue South to the west and an alley to the east. The structure on the subject property, also known as “Biegels Bar”, includes a basement that appears to have been primarily used for storage; a main level that served as the bar; and a top floor which was used as living quarters. The subject

property has significant damage from a fire in August 2013. The date the structure was constructed is not known. The current owner believes it was constructed in the 1940's, however, historical data suggests it could have been constructed between 1910 and 1921. The top level is partially burned from the 2013 fire and was not thoroughly accessed due to structural safety concerns. 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 and LBP; and other environmental hazards being present, due to the age of the structure. The Phase I ESA also noted the presence of mold. This Phase II ESA was performed as a result of the conclusions of the Phase I ESA.

The Phase I ESA also discussed the presence of a Leaking Underground Storage Tank (LUST) located approximately 74 feet from the subject property and indicated it was a Recognized Environmental Condition (REC). After subsequent research and communications with DEQ, however, it was determined that this REC was resolved on March 4, 1996. Since this REC was resolved, additional Phase II ESA investigations were not required. Communications with DEQ and the EPA are attached in Appendix B.

3.2 SITE AND VICINITY GENERAL CHARACTERISTICS

The subject property is currently vacant and consists of a now dilapidated structure that previously functioned as a bar with an upstairs living quarters in 2013. 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 subject property appears to be generally flat. Structures immediately adjacent to the subject property include City Hall to the north; and a vacant building, with a Window and Door advertising display in the front window, to the south. There is a residential structure on the other side of the alley behind the subject property. Retail and commercial structures exist on the other side of Central Avenue South, including a brewery bar.

3.3 CURRENT USE OF THE PROPERTY

The subject property is vacant and has been vacant since August 2013.

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

The subject property is developed land with a structure bound by a frontage sidewalk and Central Avenue South; and an alley at the back. The date the structure was constructed is not known. The current owner believes it was constructed in the 1940's, however, historical data suggests it could have been constructed between 1910 and 1921. The top level is partially burned from the 2013 fire and was not accessed due to structural safety concerns.

There appears to have been little additional major structural renovation; mostly aesthetic type features and walls appear to have been constructed. The subject property is served by municipal water, sewer, and other utilities; however, none were operating at the time of the site reconnaissance.

3.5 CURRENT USES OF THE ADJOINING PROPERTIES

Structures immediately adjacent to the subject property include City Hall to the north and a vacant building, with a Window and Door advertising display in the front window, to the south. There is a residential structure on the other side of the alley behind the subject property. Retail and commercial structures exist on the other side of Central Avenue South, including a brewery bar.

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 C and the Photograph Log located in Appendix D. The Phase II fieldwork was conducted on September 27, 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 an 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 (≥ 1 milligram per square centimeter [mg/cm²]). 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 17 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

Bulk Material	Number of Samples Collected
Flooring	4
Roofing Material	2
Ceiling	2
Wall (gypsum, plaster, and surfacing)	3
Concrete, brick, and mortar	5
Insulation	1

6.2 LEAD-BASED PAINT GENERAL SITE SETTING

A total of 26 XRF readings were taken. Six readings were exterior and 20 readings were interior.

6.3 PCBS, MERCURY, AND MOLD

The following observations were made during the visual inspections:

- No fluorescent light bulb light fixtures were observed. No transformers were observed at the subject property.
- One thermostat switch was observed; with a mercury component still present.
- Mold was 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 C.

7.1 ASBESTOS-CONTAINING MATERIAL

Of the 17 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 2% chrysotile (asbestos). However, a composite sample of the wallboard system (all wallboard system layers) is less than 1% and therefore is not regulated by the EPA. Occupational Safety and Health Administration (OSHA) rules are still applicable.

The positive material is wallboard taping material with joint compound on wallboard from a forced air furnace return vent in the basement. The joint compound was positive for asbestos.

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

Interpretation of Results

Based on the laboratory results reported for the one confirmed ACM sample, asbestos is present at the subject property. However, a composite sample of the wallboard system (all wallboard system layers) is less than 1% and therefore is not regulated by the EPA. OSHA rules are still applicable.

7.2 LEAD-BASED PAINT

Of the 26 XRF readings taken from the building, a total of eight readings were positive for LBP contamination (≥ 1 mg/cm²). Table 3 indicates the location, current surface paint color, and percent lead of LBP identified. Second floor window casings were inaccessible but are assumed to contain LBP.

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

Location	Substrate / Current Surface Paint Color	% LBP (mg/cm²)
Basement Storage Support "Beam"	Wood / Red	16.4
Basement Stair Riser	Wood / Gray	1.6
Exterior Window Sash	Wood / White	1.9
Exterior	Concrete / Various	4
Door Jamb to Basement	Wood / Green	3.4
Door Casing to Basement	Wood / Black	4.7
Interior Rear Door Casing	Wood / Gray	1.2
Exterior Rear Door Casing	Wood / White	3.3
Front Upper Window Casings	Wood / White	N/A (Assumed)

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

7.3 PCBs, MERCURY, AND MOLD

The following observations were made during the visual inspections:

- No light fixtures at the subject property that use fluorescent bulbs were observed. No transformers were observed at the subject property.
- One thermostat switch with a mercury component was observed.

- Mold was 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.

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	No (EPA) Yes (OSHA)	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
LBP	Building Materials	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
Mercury	Building Materials (mercury component in thermostat switch)	Yes	Potentially Complete	Dermal	--	X
				Ingestion	--	X
				Inhalation	--	X
PCBs	Building Materials (light ballasts)	No	Potentially Complete	Dermal	--	--
				Ingestion	--	--
				Inhalation	--	--

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)

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 the second floor is mostly burned and could not be safely thoroughly accessed due to significant structural damage and integrity issues.

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 19 Central Avenue South, Harlowton, Montana (subject property). The subject property is also referred to as the “Biegels Bar” 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

- Of the 17 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 2% chrysotile (asbestos). However, a composite sample of the wallboard system (all wallboard system layers) is less than 1% and therefore is not regulated by the EPA. Occupational Safety and Health Administration (OSHA) rules are still applicable. Asbestos is considered a COC due to handling and disposal considerations.

Lead-Based Paint

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

PCBs, Mercury, and Mold

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

- No light fixtures that use fluorescent bulbs were observed at the subject property. No transformers were observed at the subject property. PCBs are not considered COCs.
- One thermostat switch with a mercury component was observed at the subject property. Mercury is considered a COC.
- Mold was observed at the subject property. Mold is 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 and LBP was confirmed to be present in eight building material components. Should demolition occur, the building should be kept adequately wet during demolition activities. Under the adequately wet provision, the wall board system (less than 1% asbestos) and LBP building materials do not have to be removed prior to demolition; however, removal by trained individuals before demolition, is generally considered more protective. It is recommended that the demolition contractor contact landfills before beginning work to determine their policies for accepting related wastes. It is possible that TCLP samples for LBP will be required for off-site disposal. The disposal facility should be contacted to determine the appropriate TCLP procedure.
- Although PCB-containing equipment was not identified, if it is identified or encountered, it should be properly removed prior to relevant demolition activities, and properly disposed of.
- A mercury-containing component within the thermostat switch was identified. The mercury component should be properly removed and disposed of prior to demolition activities.
- As the presence of mold was noted, precautionary measures are recommended during remediation or demolition activities.

9.0 SIGNATURE OF PHASE II ASSESSOR

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

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

Mr. Greg Reid, P.E., WWC Lead Quality Assurance Manager

Ms. Beth Famiglietti, WWC Project Scientist

Mr. Todd Schneider, Northern Lead and Asbestos Inspector

Ms. Beth Famiglietti, under the direct supervision of Mr. Greg Reid, 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 19 Central Avenue South, Harlowton, 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 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.

Greg Reid, P.E.

Certifying Environmental Professional

Lead Quality Assurance Manager

Title



Signature

2/28/19

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, Phase II ESA review, clean-up oversight, and clean-up reports.

WWC Lead Quality Assurance Manager: Mr. Greg Reid, P.E. is a professional Engineer with a B.S. in Civil Engineering (2008), and 10 years of experience. Mr. Reid has worked on Phase I ESAs, Phase II ESAs, voluntary cleanup projects in Montana and Wyoming, and Brownfield characterization and cleanup projects.

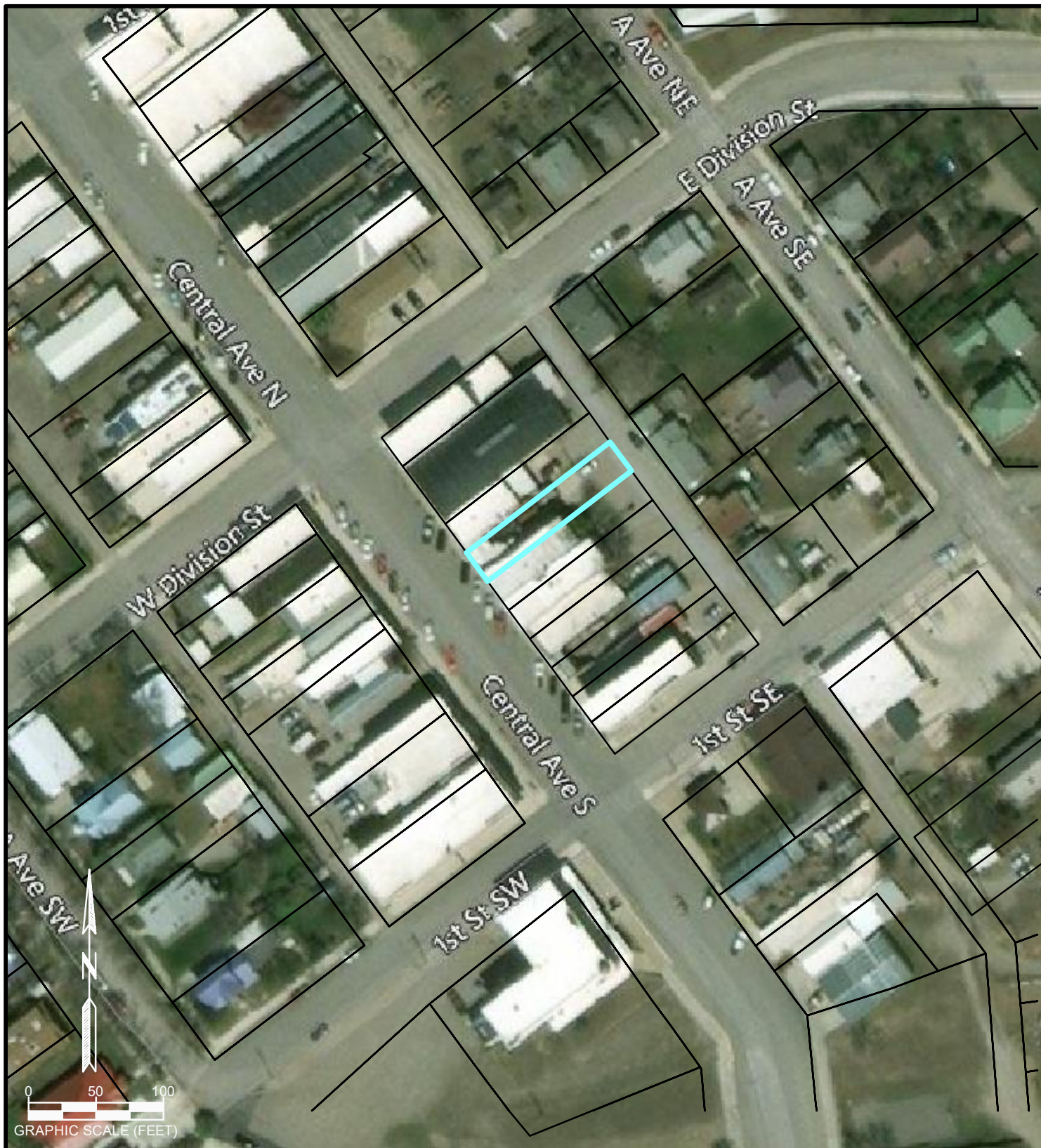
WWC Project Scientist: Ms. Beth Famiglietti, has a B.S. in Environmental Science (1996) with over 21 years of professional environmental experience in the field of environmental sciences including, but not limited to, Phase I ESA site investigations, spill investigations, SAP/ Standard Operating Procedures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

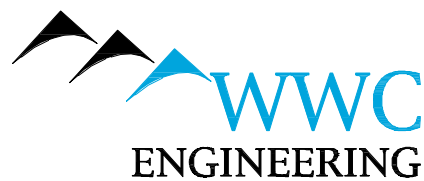


LEGEND

- SUBJECT PROPERTY
- PARCELS

FIGURE 1

SUBJECT PROPERTY BOUNDARIES
AND LOCATION MAP



Appendix B

Email Communications Concerning LUST Site

Davis, Gregory

From: Beth A. Famiglietti <bfamiglietti@wwcengineering.com>
Sent: Thursday, August 2, 2018 12:00 PM
To: Jason Seyler
Cc: Davis, Gregory; Karen Sweeney; Kathie Bailey; Garth French; Greg Reid
Subject: SDMC: Biegels Bar, Harlowton (nearby LUST site)
Attachments: ATT00001.txt

Hi Jason!

Thank you again for your recent direction regarding vapor intrusion. I really appreciate it.

The Snowy Mountain Development Corporation (SMDC) has another project we are working on. It's called the "Biegels Bar" located at 19 Central Avenue South, Harlowton, Montana. It's an older partially burned down bar, with a basement; next to the City Building. WWC recently prepared a Phase I for the subject property. The Phase I identified a LUST site, the Midtown Market at 13 South Central Avenue, 74 feet from the subject property. The LUST site (Facility ID 5413714) appears to be approximately one foot lower in elevation, as compared to the subject property, and has a resolved date of 3/4/1996.

In this case, I believe the guidance suggests I check with MT DEQ regarding the appropriate investigation area. I don't want to assume a VI investigation is needed here, as the LUST site was "resolved" nearly 23 years ago and the nature of the contamination may have been limited to a small area.

Based on your personal expertise and knowledge of the specific LUST site (or site specific information you may have access to), I am looking for some direction regarding an appropriate VI approach.

Please advise and thank you Jason.

Beth



Beth Famiglietti | Project Manager

51 N 15th St., Ste. 1 | Billings, MT 59101

Tel 406-894-2210

www.wwcengineering.com

From: Seyler, Jason <JSeyler@mt.gov>
Sent: Wednesday, August 1, 2018 11:34 AM
To: Beth A. Famiglietti <bfamiglietti@wwcengineering.com>; Davis, Gregory <Davis.Gregory@epa.gov>
Cc: Kathie Bailey <smdcdist6@hotmail.com>; Karen Sweeney <smdckaren@midrivers.com>; Garth French <gfrench@wwcengineering.com>; Greg Reid <greid@wwcengineering.com>
Subject: RE: LaFountain: Comments on the Phase 2 ESA

Hi Beth,

Thanks for the information. Based upon the information you've provided (that the LUST release is +500 feet away from the Brownfields property) DEQ feels like the likely hood of a Vapor Intrusion issue is very small. DEQ's VI guidance states as quoted by Greg that "DEQ typically evaluates potential petroleum VI threats for all current or potential future

structures within an area 100 feet laterally from a petroleum hydrocarbon contaminated soil, soil vapor, or groundwater.” If petroleum contamination is greater than 100 feet, DEQ does not require VI investigations.

I hope this helps clarify our position.

Jason

Jason Seyler
DEQ Brownfields Coordinator
406-444-6447

From: Davis, Gregory <Davis.Gregory@epa.gov>
Sent: Tuesday, July 31, 2018 3:23 PM
To: Beth A. Famiglietti <bfamiglietti@wwcengineering.com>
Cc: Kathie Bailey <smdcdist6@hotmail.com>; Karen Sweeney <smdckaren@midrivers.com>; Jason Seyler <jseyler@mt.gov>; Garth French <gfrench@wwcengineering.com>; Greg Reid <greid@wwcengineering.com>
Subject: RE: LaFountain: Comments on the Phase 2 ESA

Hi Beth,

While it was recommended in the Phase 1 ESA that a PID be used in the basement to address vapor intrusion associated with LUST sites, I don't see the PID as a valid approach for indoor air sampling. The PID will be influenced by outside influences (e.g., aerosols) in the building, and it does not have the sensitivity for all of the gas types to adequately determine whether the (very stringent) state vapor intrusion guidance screening levels can be met. Therefore, the result of the analysis would be insufficient to allow for the state to issue a No Further Action letter based on vapor intrusion being defined as a contaminant of concern.

I think that vapor intrusion may not actually be a contaminant of concern at the site. I didn't see the LUST ID numbers in the report, but from those, it can be determined through the DEQ contact whether the structure is within an area 100 feet from contaminated soil, soil vapor, or groundwater.

- 1) If it is determined to not be within 100 feet of the contaminated soil/soil vapor/groundwater, then the contaminant of concern could be addressed as not a significant concern based on the vapor intrusion guide
- 2) If it is determined to be within 100 feet, then a more specifically approvable approach (i.e., subslab sampling tested against screening levels in the VI guidance) would be needed.

I don't mean for delay on this project with this additional information, but I want to make sure that the property can be re-used and that the report addresses the Contaminants of Concern sufficient for the property to be deemed ready for re-use post-cleanup.

Thanks,
Greg

From the Montana Vapor Intrusion Guide:

3.5 AREA OF VI INVESTIGATION

3.5.1 Petroleum Hydrocarbons – MBTEXN and VPH fractions

DEQ typically evaluates potential petroleum VI threats for all current or potential future structures within an area 100 feet laterally from a petroleum hydrocarbon contaminated soil, soil vapor, or groundwater. Please confirm with the DEQ technical contact what the appropriate investigation area is for a specific site.

VI investigation sampling may include a combination of indoor air, sub-slab, and soil vapor probe sampling locations. The sampling density will depend on the contaminant source media (NAPL, soil, groundwater, soil vapor), contaminant source size, lithology, and receptor types. For example, if there is a large mass of soil contamination, variable soil lithology, variable building construction, and/or NAPL near structures, an increased sample density may be appropriate within the area of investigation. Conversely, if groundwater contamination is the primary contaminant source of vapors, the vapor concentrations may be more homogenous and a decreased sample density may be appropriate within the defined area of investigation. As discussed in Section 2.3, all structures falling within the VI investigation area do not necessarily need to be individually sampled. However, all current and future (contemplated to be developed) structures or properties within the investigation area should be assessed using a CSM. The potential for VI should be considered until the VI pathway is eliminated by evaluating the multiple lines of evidence as discussed in Section 7 or by directly sampling the structure. As an investigation progresses, the results of soil vapor sampling will be used to establish site-specific boundaries for areas with VI concerns.

)Greg

Greg Davis
USEPA, Region 8
Assessment and Revitalization Program, 8EPR-AR
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Denver, CO 80202-1129

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Appendix C

Letter Report, Asbestos and Lead-based Paint Inspections



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

October 23, 2018

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

RE: Letter Report
Asbestos and Lead-based Paint Inspections
Biegels Bar
19 S. Central Ave. Harlowton, Montana
Northern Project Number 1035-001

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 September 27, 2018 at the above referenced site. The inspections were performed to identify potential hazardous materials that may be present in the building, for demolition of the property. The inspections included the interior and the exterior.

Overview of Building

The building is a two story structure that includes a full basement. It was constructed in the early 1900's. There are approximately 3,360 square feet of interior space. In 2013 a fire started on the second floor of the building and consumed a majority of the second floor. All suspect asbestos containing materials observed on the second floor were observed and sampled in other areas of the building. No suspected asbestos containing materials were observed on the second floor that were not observed in other areas of the building.

Typical interior building materials include concrete, wood, carpet and vinyl tile finished floors, fiberboard, plaster and concrete finished walls and plaster, tile or lay-in panel finished ceilings. Lower walls in some areas are finished with wood baseboards.

Exterior building finish materials consist of concrete, stucco, glass, wood, stone, concrete block and brick.

Typical interior painted building components are walls, windows, doors, stairs and support beams.

Typical exterior painted building components are concrete, stucco and window and door components.

The building was heated by a forced air system located in the basement. The building was insulated with paper-faced fiberglass insulation.

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.

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

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 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/cm² 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 17 building materials suspected to contain asbestos were identified in the structure.

All 17 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:

- M3.1 Wallboard and taping system (wallboard & taping ND, joint compound 2% Chrysotile / Composite of all layers <1% Chrysotile)

In the Federal Register Volume 59, Number 3 dated Wednesday, January 5, 1994 the EPA issued the "Asbestos NESHAP Clarification Regarding Analysis of Multi-layered Systems". This notice of clarification to the final rule states the following regarding joint compound/wallboard:

When joint compound and/or tape is applied to wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system. Therefore, where a demolition or renovation impacts such a wall system, a composite analysis of the wall system (percent of asbestos in the joint compound, tape and wallboard) should be conducted. If the analysis shows a composite asbestos content of less than one percent, the EPA NESHAP does not regulate the wallboard system. Be advised that all OSHA regulations regarding worker exposure to asbestos fibers apply regardless of the percentage of asbestos present in the material analyzed.

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

- L-8 Basement Storage Support Beam (Wood/Red),
- L-9 Riser of Basement Stairs (Wood/Gray),
- L-13 Exterior Window Casing (Wood/White),
- L-17 Front Exterior (Concrete/Various),

- L-18 Door Jamb to Basement (Wood/Green),
- L-19 Door Casing to Basement Stairs (Wood/Black),
- L-23 Rear Entry Interior Door Casing (Wood/Gray) and
- L-24 Rear Entry Exterior Door Casing (Wood/White).

One building component was assumed to contain lead-based paint. The building component assumed to contain lead-based paint is:

- L-26 Front Upper Window Casing (Wood/Gray)

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

Conclusions

Asbestos

Asbestos greater than 1% (2% Chrysotile Asbestos) was detected in the joint compound of the gypsum wallboard and taping system. The composite of the layers reported by the laboratory for the gypsum wallboard and taping system was <1% Chrysotile Asbestos.

Lead-Based Paint

Eight lead-based paint painted building components were identified at the facility. One building material was assumed to contain lead-based paint.

Recommendations

Northern recommends that the building be kept adequately wet during demolition activities to prevent visible dust. Under the adequately wet provision the gypsum wall board system and lead-based painted building materials do not have to be removed prior to demolition.

Northern recommends that the demolition contractor contact the landfill where these materials will be disposed to determine their policies regarding disposal of materials containing less than 1% asbestos.

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
Biegels Bar
Harlowton, Montana
October 23, 2018
Page 7

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
 Laboratory Analysis Report
 Inspector Credentials
 Invoice
 Photographs

TABLE 1
SUMMARY OF MATERIALS SUSPECTED TO CONTAIN ASBESTOS
AND LABORATORY RESULTS
Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Material Description	Friable (Y/N)	Sample Locations	Laboratory Results
F2.1	12"X12" Floor Tile - Tan Speckled with Tan Mastic	N	Main and Pool Rooms	All Layers ND
F2.2	12"X12" Floor Tile - Black Speckled with Tan Mastic and Leveler	N	Main and Pool Rooms	All Layers ND
F2.3	12"X12" Floor Tile - Hexagon Pattern with Brown Backing and Tan Mastic	N	Ladies and Men's Restrooms	All Layers ND
F6.1	Carpet - Thin - Various Colors with Tan Glue	N	Pool Room and Stairwell to Upper Apartment	All Layers ND
M1.1	Membrane Roof	N	Roof	ND
M1.2	Asphalt Shingle and Tar	N	Roof Above Rear Entry	All Layers ND
M3.1	Gypsum Board Wall and Ceiling System	N	HVAC Return in Basement	Wallboard and Taping Material (Wallboard - ND / Joint Compound - 2% Asbestos / Composite of Layers - <1% Asbestos)
M5.1	2'X4' Lay-in Ceiling Panels	Y	Pool Room	ND
M6.1	36"X36" Ceiling Tiles	Y	Main Room	ND
M7.1	Plaster Wall	N	Exterior Wall Rear Entry	ND
M14.1	Concrete - Smooth	N	Basement and Keg Storage Floor	ND
M14.2	Concrete - Rough	N	Basement Back Storage	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
Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Material Description	Friable (Y/N)	Sample Locations	Laboratory Results
M16.1	Brick	N	Basement Back Storage	ND
M16.2	Mortar	N	Basement Back Storage	ND
M17.1	CMU and Mortar	N	Loading Building	All Layers ND
M19.1	Paper-Faced Fiberglass Insulation	Y	Keg Storage and Pool Room	All Layers ND
S1.1	Surfacing on Cement Wall	Y	Stairwell to Basement	ND

NS = Material Not Sampled
ND = No Asbestos Detected

Confirmed Asbestos-Containing Materials Shown in Bold Type

Table 1

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

Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Material Description	Asbestos NESHAP Category	Asbestos OSHA Work Class	Recommended Response Action
M3.1	Wallboard and Taping Material (Wallboard - ND / Joint Compound - 2% Asbestos / Composite of Layers - <1% Asbestos)	Not Applicable (Composite of Layers <1%)	II	Retain accredited asbestos abatement contractor to remove following OSHA Class II work practices prior to conducting any renovation or demolition work that will impact this asbestos-containing material. EPA allows material to be disposed as general construction waste however check with local landfill for site specific requirements.

Asbestos NESHAP Category Definition

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.

OSHA Asbestos Work Class Definition

Class I asbestos work means activities involving the removal of TSI and friable surfacing ACM and PACM

Class II asbestos work means activities involving the removal of ACM which is not TSI or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

ACM - Asbestos-containing material

TSI = Thermal System Insulation

PACM = Presumed asbestos-containing material

TABLE 3
IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS
Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Building Component	Substrate	Color	Material Condition	XRF Result mg/cm²	Result
L-1	Wall	Concrete	Green	Intact	0	Negative
L-2	Wall	Fiber Board	Green/Red/Tan	Deteriorated	0.06	Negative
L-3	Door Casing in Basement	Wood	Green/Red	Intact	0	Negative
L-4	Door Jamb in Basement	Wood	Green	Intact	0	Negative
L-5	HVAC Return Vent	Gypsum Board	Green	Deteriorated	0	Negative
L-6	Slat Wall	Wood	Green	Intact	0	Negative
L-7	Door in Basement	Wood	Green	Deteriorated	0.02	Negative
L-8	Basement Storage Support Beam	Wood	Red	Deteriorated	16.4	Positive
L-9	Basement Stair Riser	Wood	Gray	Deteriorated	1.6	Positive

* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm² measured using XRF screening.

* Neg = Nonlead-based paint - less than 1.0 mg/cm² measured using XRF screening.

** Reference photographs and drawings for locations of confirmed materials.

Confirmed Lead Based Paint Shown in Bold Type

Table 3

TABLE 3
IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS
Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Building Component	Substrate	Color	Material Condition	XRF Result mg/cm²	Result
L-10	Basement Stairwell Step	Wood	Various	Intact	0.2	Negative
L-11	Front Entry Door	Wood	White	Deteriorated	0.03	Negative
L-12	Front Entry Door Jamb	Wood	White	Deteriorated	0	Negative
L-13	Exterior Window Sash	Wood	White	Deteriorated	1.9	Positive
L-14	3 Panel Exterior Door (to second floor)	Wood	White	Deteriorated	0	Negative
L-15	Exterior Door 2 Casing (to second floor)	Wood	White	Deteriorated	0	Negative
L-16	Front Exterior Upper	Stucco	White	Deteriorated	0	Negative
L-17	Exterior	Concrete	Various	Deteriorated	4	Positive
L-18	Door Jamb to Basement	Wood	Green	Deteriorated	3.4	Positive

* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm² measured using XRF screening.

* Neg = Nonlead-based paint - less than 1.0 mg/cm² measured using XRF screening.

** Reference photographs and drawings for locations of confirmed materials.

Confirmed Lead Based Paint Shown in Bold Type

TABLE 3
IDENTIFIED PAINTED BUILDING COMPONENTS and XRF SCREENING RESULTS
Biegels Bar
19 S. Central Ave
Harlowton, Montana

Material Number	Building Component	Substrate	Color	Material Condition	XRF Result mg/cm²	Result
L-19	Door Casing to Basement	Wood	Black	Deteriorated	4.7	Positive
L-20	Baseboard	Wood	Black/Pink	Deteriorated	0	Negative
L-21	Restroom Stall Wall	Wood	White	Deteriorated	0.15	Negative
L-22	5 Panel Door	Wood	Black	Intact	0.4	Negative
L-23	Interior Rear Door Casing	Wood	Gray	Deteriorated	1.2	Positive
L-24	Exterior Rear Door Casing	Wood	White	Deteriorated	3.3	Positive
L-25	Rear Door Jamb	Wood	White	Deteriorated	0.23	Negative
L-26	Front Upper Window Casings	Wood	White	Deteriorated	Assumed	Positive

* Pos = Lead-based paint - equal to or greater than 1.0 mg/cm² measured using XRF screening.

* Neg = Nonlead-based paint - less than 1.0 mg/cm² measured using XRF screening.

** Reference photographs and drawings for locations of confirmed materials.

Confirmed Lead Based Paint Shown in Bold Type

L-26 Second Floor Window Casing Assumed



L-13 Exterior Window Sash

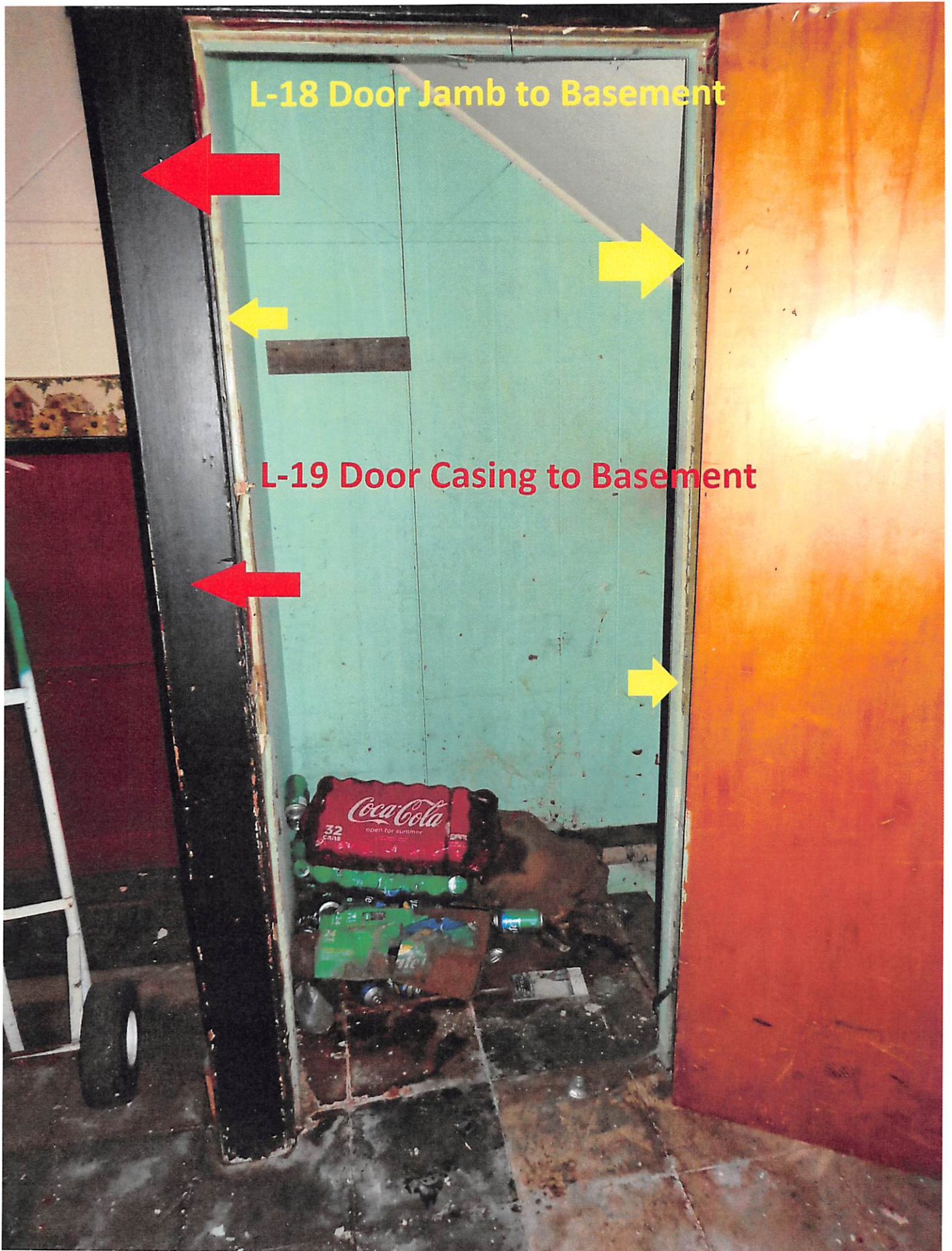


L-17 Concrete Wall (Assumed Under Stonework)



L-18 Door Jamb to Basement

L-19 Door Casing to Basement



**EMSL Analytical, Inc.**

3356 West Catalina Drive Phoenix, AZ 85017

Tel/Fax: (602) 276-4344 / (602) 276-4053

<http://www.EMSL.com> / phoenixlab@emsl.com**EMSL Order:** 121806511**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:** 10/01/2018 9:30 AM**Analysis Date:** 10/02/2018 - 10/04/2018**Collected Date:** 09/27/2018**Project:** Biegels Bar / 1035-001

**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
F2.1A-Floor Tile 121806511-0001	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1A-Mastic 121806511-0001A	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1B-Floor Tile 121806511-0002	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1B-Mastic 121806511-0002A	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1C-Floor Tile 121806511-0003	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.1C-Mastic 121806511-0003A	12"x12" Floor Tile Tan Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2A-Floor Tile 121806511-0004	12"x12" Floor Tile Black Speckled	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2A-Mastic 121806511-0004A	12"x12" Floor Tile Black Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2B-Floor Tile 121806511-0005	12"x12" Floor Tile Black Speckled	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2B-Mastic 121806511-0005A	12"x12" Floor Tile Black Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2C-Floor Tile 121806511-0006	12"x12" Floor Tile Black Speckled	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2C-Mastic 121806511-0006A	12"x12" Floor Tile Black Speckled	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.2C-Leveler 121806511-0006B	12"x12" Floor Tile Black Speckled	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.3A-Floor Tile 121806511-0007	12"x12" Floor Tile Hexagon Pattern	Various Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
F2.3A-Mastic 121806511-0007A	12"x12" Floor Tile Hexagon Pattern	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.3A-Backing 121806511-0007B	12"x12" Floor Tile Hexagon Pattern	Brown Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected

Initial report from: 10/08/2018 12:08:31

**EMSL Analytical, Inc.**

3356 West Catalina Drive Phoenix, AZ 85017

Tel/Fax: (602) 276-4344 / (602) 276-4053

<http://www.EMSL.com> / phoenixlab@emsl.com**EMSL Order:** 121806511**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
F2.3B-Floor Tile 121806511-0008	12"x12" Floor Tile Hexagon Pattern	Various Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
F2.3B-Mastic 121806511-0008A	12"x12" Floor Tile Hexagon Pattern	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.3C-Floor Tile 121806511-0009	12"x12" Floor Tile Hexagon Pattern	Various Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F2.3C-Mastic 121806511-0009A	12"x12" Floor Tile Hexagon Pattern	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1A-Carpet 121806511-0010	Carpet Thin Various	Various Fibrous Heterogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1A-Glue 121806511-0010A	Carpet Thin Various	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1B-Carpet 121806511-0011	Carpet Thin Various	Various Fibrous Heterogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1B-Glue 121806511-0011A	Carpet Thin Various	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
F6.1C-Carpet 121806511-0012	Carpet Thin Various	Various Fibrous Heterogeneous	95% Synthetic	5% Non-fibrous (Other)	None Detected
F6.1C-Glue 121806511-0012A	Carpet Thin Various	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M1.1A 121806511-0013	Membrane Roof	White/Black Fibrous Heterogeneous	10% Synthetic	90% Non-fibrous (Other)	None Detected
M1.1B 121806511-0014	Membrane Roof	White/Black Fibrous Heterogeneous	10% Synthetic	90% Non-fibrous (Other)	None Detected
M1.1C 121806511-0015	Membrane Roof	White/Black Fibrous Heterogeneous	10% Synthetic	90% Non-fibrous (Other)	None Detected
M1.2A-Shingle 121806511-0016	Asphalt Shingle Roof	Red/Black Fibrous Heterogeneous	20% Cellulose 4% Synthetic	76% Non-fibrous (Other)	None Detected
M1.2A-Tar 121806511-0016A	Asphalt Shingle Roof	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M1.2B-Shingle 121806511-0017	Asphalt Shingle Roof	Red/Black Fibrous Heterogeneous	20% Cellulose 4% Synthetic	76% Non-fibrous (Other)	None Detected
M1.2B-Tar 121806511-0017A	Asphalt Shingle Roof	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M1.2C-Shingle 121806511-0018	Asphalt Shingle Roof	Red/Black Fibrous Heterogeneous	20% Cellulose 4% Synthetic	76% Non-fibrous (Other)	None Detected
M1.2C-Tar 121806511-0018A	Asphalt Shingle Roof	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 10/08/2018 12:08:31

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<http://www.EMSL.com> / phoenixlab@emsl.com

EMSL Order: 121806511

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
M3.1A-Tape 121806511-0019	Gypsum Board System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1A-Joint Compound 121806511-0019A <i>Paint excluded.</i>	Gypsum Board System	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 78% Non-fibrous (Other)	2% Chrysotile
M3.1A-Gypsum Board 121806511-0019B	Gypsum Board System	Brown/White Fibrous Heterogeneous	10% Cellulose	85% Gypsum 5% Non-fibrous (Other)	None Detected
M3.1A-Composite 121806511-0019C <i>This is a composite result of wallboard, jt. compound, and tape.</i>	Gypsum Board System	Various Fibrous Heterogeneous	10% Cellulose	65% Gypsum 25% Non-fibrous (Other)	<1% Chrysotile
M3.1B-Tape 121806511-0020	Gypsum Board System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1B-Joint Compound 121806511-0020A <i>Paint excluded.</i>	Gypsum Board System	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 78% Non-fibrous (Other)	2% Chrysotile
M3.1B-Gypsum Board 121806511-0020B	Gypsum Board System	Brown/White Fibrous Heterogeneous	10% Cellulose	85% Gypsum 5% Non-fibrous (Other)	None Detected
M3.1B-Composite 121806511-0020C <i>This is a composite result of wallboard, jt. compound, and tape.</i>	Gypsum Board System	Various Fibrous Heterogeneous	10% Cellulose	65% Gypsum 25% Non-fibrous (Other)	<1% Chrysotile
M3.1C-Tape 121806511-0021	Gypsum Board System	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
M3.1C-Joint Compound 121806511-0021A <i>Paint excluded.</i>	Gypsum Board System	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 78% Non-fibrous (Other)	2% Chrysotile
M3.1C-Gypsum Board 121806511-0021B	Gypsum Board System	Brown/White Fibrous Heterogeneous	10% Cellulose	85% Gypsum 5% Non-fibrous (Other)	None Detected
M3.1C-Composite 121806511-0021C <i>This is a composite result of wallboard, jt. compound, and tape.</i>	Gypsum Board System	Various Fibrous Heterogeneous	10% Cellulose	85% Gypsum 5% Non-fibrous (Other)	<1% Chrysotile
M5.1A 121806511-0022	2'x4' Lay-In Ceiling Panels	Gray/White Fibrous Heterogeneous	40% Cellulose 40% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M5.1B 121806511-0023	2'x4' Lay-In Ceiling Panels	Gray/White Fibrous Heterogeneous	40% Cellulose 40% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M5.1C 121806511-0024	2'x4' Lay-In Ceiling Panels	Gray/White Fibrous Heterogeneous	40% Cellulose 40% Min. Wool	10% Perlite 10% Non-fibrous (Other)	None Detected
M6.1A 121806511-0025	36"x36" Ceiling Tiles	Brown/Beige Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M6.1B 121806511-0026	36"x36" Ceiling Tiles	Brown/Beige Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected

Initial report from: 10/08/2018 12:08:31

**EMSL Analytical, Inc.**

3356 West Catalina Drive Phoenix, AZ 85017

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EMSL Order: 121806511

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
M6.1C 121806511-0027	36"x36" Ceiling Tiles	Brown/Beige Fibrous Heterogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
M7.1A 121806511-0028 <i>Paint excluded.</i>	Plaster Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M7.1B 121806511-0029 <i>Paint excluded.</i>	Plaster Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M7.1C 121806511-0030 <i>Paint excluded.</i>	Plaster Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1A 121806511-0031	Concrete Smooth	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1B 121806511-0032	Concrete Smooth	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.1C 121806511-0033	Concrete Smooth	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2A 121806511-0034	Concrete Rough	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2B 121806511-0035	Concrete Rough	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M14.2C 121806511-0036	Concrete Rough	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.1A 121806511-0037	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.1B 121806511-0038	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.1C 121806511-0039	Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2A 121806511-0040	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2B 121806511-0041	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M16.2C 121806511-0042	Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M19.1A-Paper 121806511-0043	Paper Faced Fiber Glass Insulation	Brown/Gold Fibrous Heterogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
M19.1A-Insulation 121806511-0043A	Paper Faced Fiber Glass Insulation	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected

Initial report from: 10/08/2018 12:08:31

**EMSL Analytical, Inc.**

3356 West Catalina Drive Phoenix, AZ 85017

Tel/Fax: (602) 276-4344 / (602) 276-4053

<http://www.EMSL.com> / phoenixlab@emsl.com

EMSL Order: 121806511

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
M19.1B-Insulation 121806511-0044 No Paper present.	Paper Faced Fiber Glass Insulation	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected
M19.1C-Insulation 121806511-0045 No Paper present.	Paper Faced Fiber Glass Insulation	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected
S1.1A 121806511-0046 Paint excluded.	Surfacing On Cement Wall	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
S1.1B 121806511-0047 Paint excluded.	Surfacing On Cement Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
S1.1C 121806511-0048 Paint excluded.	Surfacing On Cement Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)

Isai Portillo (33)

Jacob Markey (42)

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: 10/08/2018 12:08:31

EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS-TRADING

Asbestos Bulk Building Material Chain of Custody

EMSL Order Number (Lab Use Only):

121806511

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

Company : Northern Industrial Hygiene		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**	
Street: 201 S. 30 th Street		Third Party Billing requires written authorization from third party	
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: Biegels Bar / 1035-001		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			
<input type="checkbox"/> 3 Hour <input type="checkbox"/> 6 Hour <input type="checkbox"/> 24 Hour <input type="checkbox"/> 48 Hour <input type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input checked="" type="checkbox"/> 1 Week <input type="checkbox"/> 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)		Other	
<input type="checkbox"/> OSHA ID-191 Modified		<input type="checkbox"/>	
<input type="checkbox"/> Standard Addition Method			
<input checked="" type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Date Sampled: 9-27-18	
Samplers Name: Todd Schneider		Samplers Signature: <i>Todd Schneider</i>	
Sample #	HA #	Material Description	Sample Location
F2.1 A	F2.1	12" x 12" floor tile Tan speckled	Main
B	1	1	Main
C	1	1	Pool Room
F2.2 A	F2.2	12" x 12" floor Tile Black speckled	Main
B	1	1	Main
C	1	1	Pool Room
F2.3 A	F2.3	12" x 12" floor tile Hexagon Pattern	Ladies Room
B	1	1	Men's Room
C	1	1	Men's Room
Client Sample # (s): F2.1 A - 51.1 C		Total # of Samples: 48	
Relinquished (Client): <i>Todd Schneider</i>		Date: 9-28-18	Time: 1700
Received (Lab): <i>[Signature]</i>		Date: 10-1-18	Time: 9:30
Comments/Special Instructions:			
7955 7837 7683			

EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Bulk Building Material Chain of Custody

EMSL Order Number (Lab Use Only):

121806511

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

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

Sample #	HA #	Material Description	Sample Location
F6.1A	F6.1	Carpet thin various	Pool Room
B	⊥	⊥ ⊥ ⊥	Pool Room
C	⊥	⊥ ⊥ ⊥	stair well up
M1.1A	M1.1	Membrane Roof	Roof
B	⊥	⊥ ⊥	⊥
C	⊥	⊥ ⊥	⊥
M1.2A	M1.2	Asphalt shingle roof	Roof above Rear Entrance
B	⊥	⊥ ⊥ ⊥	⊥ ⊥ ⊥
C	⊥	⊥ ⊥ ⊥	⊥ ⊥ ⊥
M3.1A	M3.1	Gypsum Board system	Open HVAC Return Basement
B	⊥	⊥ ⊥ ⊥	⊥ ⊥ ⊥
C	⊥	⊥ ⊥ ⊥	⊥ ⊥ ⊥
M5.1A	M5.1	2' x 4' lay-in ceiling panels	Pool Room
B	⊥	⊥ ⊥ ⊥	⊥
C	⊥	⊥ ⊥ ⊥	⊥
M6.1A	M6.1	36" x 36" ceiling tiles	Main
B	⊥	⊥ ⊥	⊥
C	⊥	⊥ ⊥	⊥
M7.1A	M7.1	Plaster wall	Exterior wall rear entry
B	⊥	⊥ ⊥	⊥ ⊥
C	⊥	⊥ ⊥	⊥ ⊥
M14.1A	M14.1	Concrete smooth	Basement Floor
B	⊥	⊥ ⊥	keg storage floor
C	⊥	⊥ ⊥	basement floor
*Comments/Special Instructions:			

12/806511

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

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

[illegible]

***Comments/Special Instructions:**

**EMSL Analytical, Inc.**

3356 West Catalina Drive Phoenix, AZ 85017

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<http://www.EMSL.com/phoenixlab@emsl.com>

EMSL Order: 121806906

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: 10/16/2018 9:30 AM

Analysis Date: 10/18/2018

Collected Date: 10/15/2018

Project: Biegel Bar/ 1035-001

**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
M17.1A-Block 121806906-0001	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M17.1A-Mortar 121806906-0001A	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M17.1B-Block 121806906-0002	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M17.1B-Mortar 121806906-0002A	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M17.1C-Block 121806906-0003	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M17.1C-Mortar 121806906-0003A	CMU Block And Mortar	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)

Isai Portillo (4)

Jacob Markey (2)

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: 10/19/2018 11:44:58

121806906

TODD SCHNEIDER

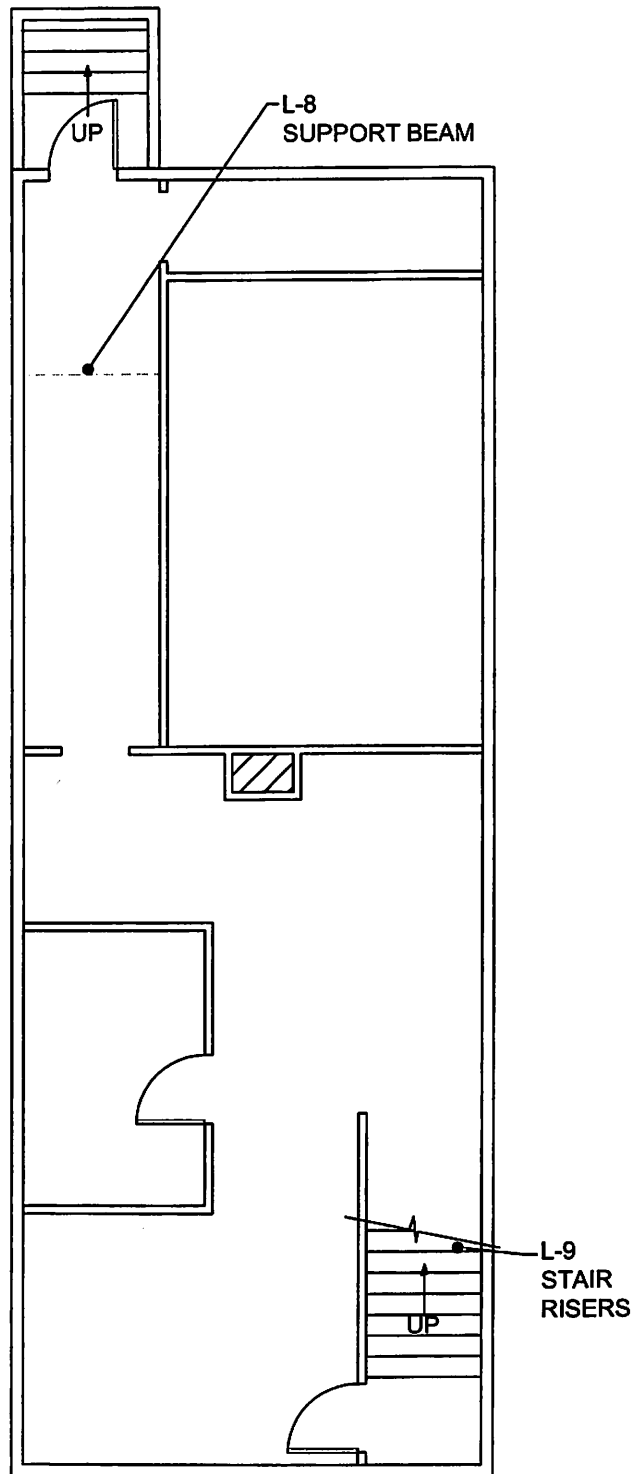
has met the requirements of Montana Administrative Rule
17.74.362 and/or 17.74.363 for accreditation in the following
asbestos occupation(s) through the specified expiration date(s).

MTA-5179

Asbestos Inspector
Project Contractor/Supervisor

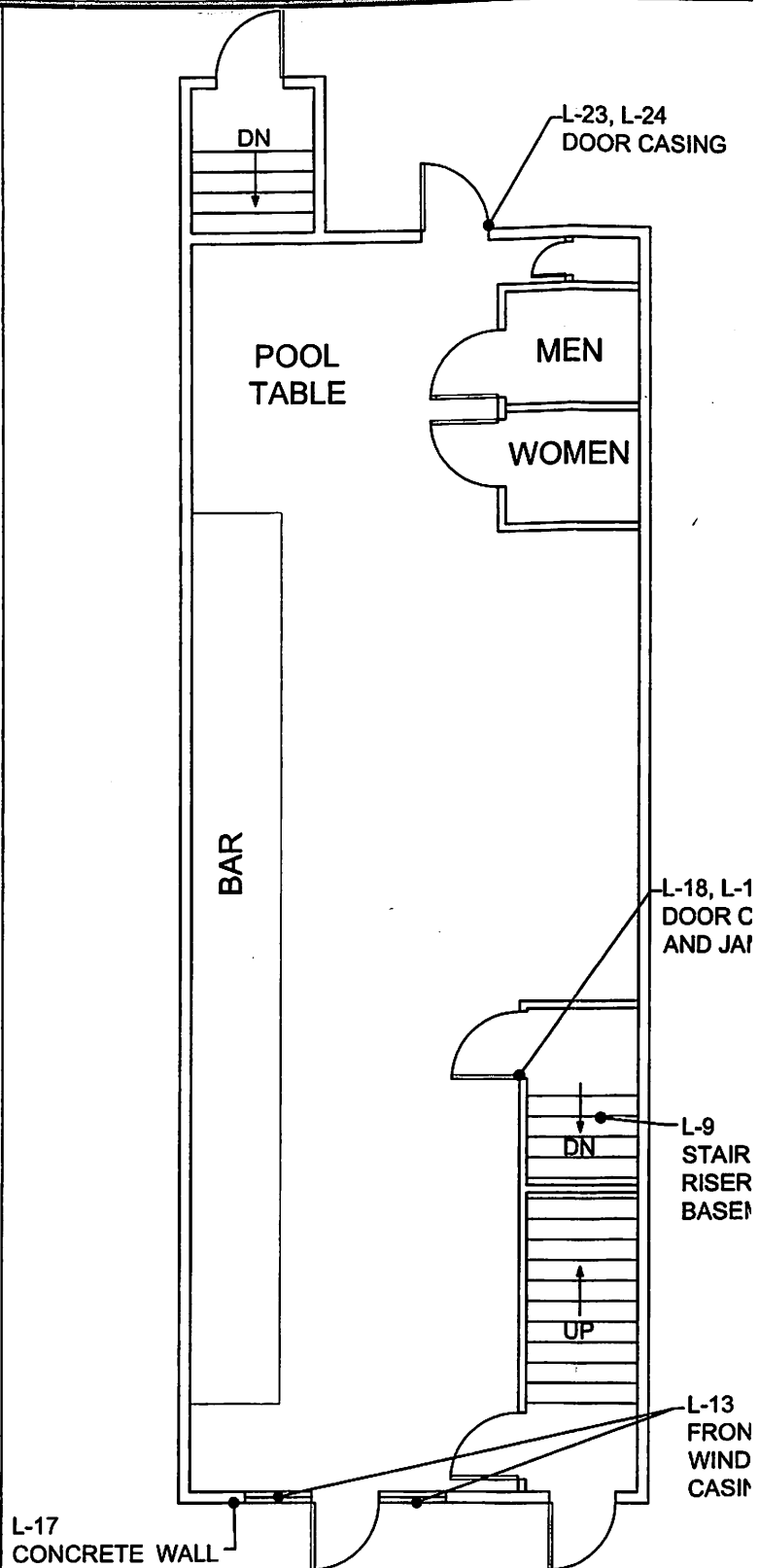
12/06/2018
03/02/2019

MT DEQ Asbestos Control Program



BASEMENT FLOOR PLAN

SCALE: 1/8" = 1'-0"



MAIN FLOOR PLAN

SCALE: 1/8" = 1'-0"

-23, L-24
DOOR CASING

EN

MEN

L-18, L-19
DOOR CASING
AND JAMB

L-9
STAIR
RISERS TO
BASEMENT

L-13
FRONT
WINDOW
CASING

AREA OF FIRE -
ALL BURNED -
ACCESS LIMITED

DN

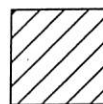
L-26
ASSUMED
SECOND
FLOOR
WINDOW
CASING

SECOND FLOOR PLAN



SCALE: 1/8" = 1'-0"

GRAPHIC LEGEND:



WALL BOARD DUCT
SYSTEM. JOINT
COMPOUND 2%
ASBESTOS.
COMPOSITE OF
LAYERS <1%
ASBESTOS. RETURN
VENT FOR FORCED
AIR FURNACE.

SHEET NOTES:

1. ASSUMED LEAD-BASED PAINT
ON SECOND FLOOR WINDOW /
CASING.
2. ASSUMED LEAD-BASED PAINT
ON CONCRETE UNDER FRONT
STONEWORK.

Appendix D

Site Photos

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

9/27/2018: WWC Site Photos



View of top floor from top of steps.



Thermostat behind bar containing mercury.



Newer thermostat that does not appear to contain mercury.

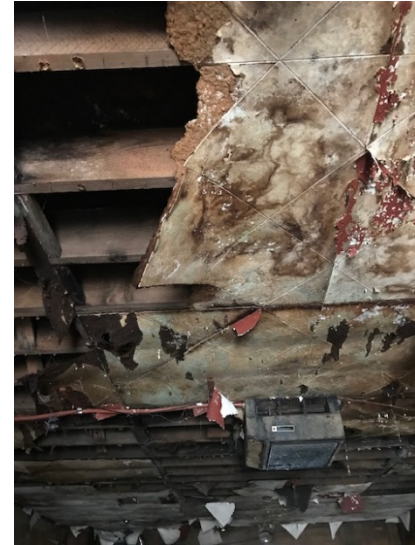


Front of Subject Property.

9/27/2018: WWC Site Photos



Mold and water damage on ceiling of main level.



Mold and water damage on ceiling of main level.



LBP on board in basement.



LBP on step riser (stairs to basement).

9/27/2018: WWC Site Photos



LBP around window frame.



LBP around front door (the green and/or underlying paints).



LBP around door to basement.



LBP around door to basement.