Notice of Intent to Remove Asbestos

Case #: 24-878
Amendment: 0

11815 NE 99th Street, Suite 1294
Vancouver, WA 98662
Voice: 360-574-3058
Fax: 360-576-0925
Web: https://www.swcleanair.gov
Email: Tina@swcleanair.gov

Date Received: 12/30/2024
Date Paid: 12/30/2024
SWCAA Fee: $735.00
Receipt #: 168500983

This notification MUST be present at all times at the asbestos project sit

Quantity to be removed: 9420 Square Feet 0 Linear Feet
Workshift days: M T W Th F
Project starting date: 1/15/2025 Project Completion date: 1/31/2025
Workshift hours: 8am to 5pm

Site Name: Fibre Federal Credit Union
Site address: 770 11th Ave, Longview WA 98632
Location of Asbestos:
City/State/Zip: Longview WA 98632
☐ Demolition of Structure (Notification of Demolition required)
County: COWLITZ COUNTY

☑ Asbestos survey conducted?
No survey reason:
AHERA Inspector: Anthony Fullerton
Certification #: 190507

Material to be Removed:

☐ Fireproofing ☐ Popcorn Ceiling ☐ CAB ☑ Sheet Vinyl ☐ Boiler Insulation ☐ Duct Tape
☐ Duct Paper ☑ Mag Pipe Insulation ☐ Air Cell ☐ CA Pipe ☐ VAT
☑ Other Tile Mastic (Bathrooms). Gypsum Wallboard Soffit (Exterior),

Control Methods:

☑ N.P Enclosure ☑ Glove Bag ☐ Mini Enclosure ☐ Wrap and Cut ☑ Water ☑ HEPA Vac
☐ Other

Asbestos Contractor: Willamette Construction Services
Phone: 503-236-4299
Mailing Address: 8823 N Harborgate St, Portland, OR, 97203
Email: bob@gdsidemo.com
Certification ##: ABCN00001672
Supervisor: Leonides Lima & Jacob Reding
Phone: 503314-6552-&a

Property Owner: Fibre Federal Credit Union
Phone: 360-957-3413
Mailing Address: 822 Commerce Ave,Longview WA 98632

Asbestos Disposal Site: Hillsboro Landfill: 3205 SE Minter Bridge Rd, Hillsboro, OR, 97123-

I DO HEREBY CERTIFY THAT THE INFORMATION CONTAINED IN THIS NOTIFICATION IS, TO THE BEST OF MY KNOWLEDGE, ACCURATE AND COMPLETE.

Submitter Name: Jose Padilla
Representing: Willamette CSI DBA GDSI
Submitter Title: Asbestos Division Manager
Date Submitted: 12/30/2024

Reviewed by SWCAA: Danielle Kreps 
☑ Approved

HAZARDOUS BUILDING MATERIALS SURVEY

Pre-Purchase

770 11th Avenue
Longview, Washington

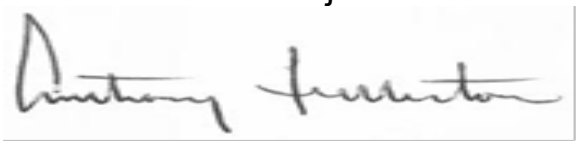
Prepared for:

Haley & Aldrich, Inc.
3131 Elliott Avenue, Suite 600
Seattle, Washington 98121

Prepared by:

Med-Tox Northwest
Post Office Box 1446
Auburn, Washington 98071-1446
Telephone: 253-351-0677

Project No. 9110.8



Anthony Fullerton
AHERA BI #190507 Exp. 08/22/2024
September 2023

Table of Contents

Tables

Acronyms

AAS	atomic absorption spectroscopy
ACM	asbestos-containing materials
ACT	acoustical ceiling tile
AHERA	Asbestos Hazard Emergency Response Act
ASHARA	Asbestos Schools Hazard Abatement Reauthorization Act
ASTM	American Society of Testing and Materials
CAB	cement asbestos board
CFC	chlorofluorocarbons
CFR	Code of Federal Regulation
DEHP	Di (2-ethylhexyl) phthalate
ECD	electron capture detectors
EPA	U.S. Environmental Protection Agency
EMSL	EMSL Analytical, Inc.
GC	gas chromatography
GWB	gypsum wallboard
HBM	hazardous building materials
HID	high intensity discharge
HM	homogeneous material
LBP	lead-based paint
mg/cm^2	milligrams per square centimeter
mg/kg	milligrams per kilogram
MTNW	Med-Tox Northwest
ND	none detected
NIST	National Institute of Standards and Technology
NVLAP	National Voluntary Laboratory Accreditation Program
OSHA	Occupational Safety and Health Administration
PCB	polychlorinated biphenyl
PLM	polarized light microscopy
ppm	parts per million
RCRA	Resource Conservation and Recovery Act
RTU	roof-top unit
SAT	Seattle Asbestos Test
SF	square feet
SVF	sheet vinyl flooring
SWCAA	Southwest Clean Air Agency
TCLP	Toxicity Characterization Leaching Procedure
TSI	thermal system insulation
VFT	vinyl floor tile
WAC	Washington Administration Code
WDOC	Washington State Department of Commerce

WISHA	Washington Industrial Health and Safety Act
XRF	x-ray fluorescence
% wt.	percent in weight

Survey Summary

On August 24, 2023, Anthony Fullerton of Med-Tox Northwest (MTNW) conducted a hazardous building materials (HBM) survey of the commercial structure located at 770 11th Avenue in Longview, Washington. This work was conducted for pre-purchase due diligence in accordance with our P-9110.8 proposal. A previous asbestos and lead based paint survey was conducted by Hart Crowser in 1999. Information from this survey is included in this report as applicable.

The survey included asbestos, lead-based paint (LBP), and other potential HBM such as chlorofluorocarbons (CFC), polychlorinated biphenyl (PCB) light ballasts and solids sampling, mercury-containing fluorescent tubes and/or thermostats. A limited visual microbial assessment was also conducted at the time of the survey. Washington Administrative Code (WAC) 296-155-775 requires identification of asbestos and hazardous materials and their hazards eliminated before demolition is started.

Limited destructive investigation was performed during survey; however, renovation or demolition activities may uncover additional suspect asbestos materials. The site was partially occupied at the time of the survey. The Comments and Recommendations section of this report details additional destructive investigation required before and/or during demolition activities.

As required by WAC 296-62-077 and Southwest Clean Air Agency (SWCAA), building inspectors certified under the Asbestos Hazard Emergency Response Act (AHERA) and employed by MTNW conducted the asbestos portion of the survey. Copies of the inspectors' AHERA Building Inspector and Washington State Department of Commerce (WDOC) Lead Inspector/Risk Assessor certificates are included in **Appendix A**.

Building Information

Photographic documentation of the structures and the major systems described herein is provided in **Appendix B.**

General and Structural:

The following Cowlitz County property was included in the survey activities:

- Cowlitz County Tax Parcel No. 0842 901 located at 770 11th Avenue in Longview, Washington. The site, which totals 3.03 acres of land, developed with a 44,982 square foot (SF) commercial building with warehouse space. The building was constructed in 1969.

This building is a combination of office space and warehouse space. It was previously used as a newspaper printing facility with supporting office areas. At the time of the MTNW survey, the printing areas were being used for storage. The office spaces were still being used. The main portion of the building is constructed of brick and mortar with wood framed roof. The exterior walls are brick with aluminum framed windows that have

cement asbestos board (CAB) filler panels located above and below the glass windows. The roof is flat and is finished with a white sealed membrane type roofing material. Documentation posted on the roof access ladder indicates that this roof is still under manufacturer warranty. It is not clear if there are additional layers of existing roofing under the newer roof system. The warehouse portion of the building has corrugated metal siding on the exterior of the building. There were no windows observed in this part of the building.

The office area is primarily open space with some enclosed office spaces. The office area is broken up into several different sections. These include lobby, accounting, Newsroom, Retail area, and lunchroom. Interior finishes include un-textured gypsum wallboard system, carpeting with mastic, cove base with mastic (several types), and suspended ceiling with drop-in acoustical ceiling tiles (ACT). The restrooms in the office area are finished with orange peel textured gypsum wallboard (GWB) system along with ceramic wall and floor tile. Other finishes observed include vinyl floor tile (VFT) and mastic, and sheet vinyl flooring (SVF). The previous Hart Crowser report identified asbestos containing flooring in the lunchroom and adjacent west hallway. It appears that this flooring was abated and newer VFT and mastic was installed.

The warehouse areas are broken up into several sections. These include Mailroom, Press room, Reel room and Plate Making room. The warehouse spaces are finished with similar materials as was observed in the office area. However, most floors in these spaces are finished with SVF or were bare concrete. Most of the previously identified asbestos containing flooring is still in place. Previous survey documentation also indicated that the Pressroom and Reel room had asbestos containing spray applied fireproofing on the walls and ceilings. This material was not observed during the MTNW survey. The report also identified asbestos containing acoustical ceiling tile in the mail room and several other places in the building. Multiple samples were collected from all types of ceiling tile observed during the MTNW survey. None of the ceiling tiles sampled by MTNW were found to contain asbestos.

The building is heated and cooled by roof-top units (RTU). The ducting for these units is located above the drop ceiling throughout most of the building. The domestic water system is heated by localized electric hot water heaters. Pipes associated with this system are insulated with fiberglass insulation. The pipes were observed above the drop ceiling and in pipe chase closets located between the restrooms. The previous survey conducted indicated that pipes throughout also had asbestos containing mudded pipe fittings on the plumbing pipes. At the time of the MTNW survey, most fittings appeared to have been abated. There were several still in place on some pipes located above the drop ceiling in the Mailroom. All pipes observed in between the restrooms in the pipe chase closets were void of insulation on the elbows and tee's.

Asbestos Survey

The AHERA regulation, 40 Code of Federal Regulations (CFR) 763, is the primary governing regulation when performing asbestos surveys. This regulation was originally

enacted for school buildings but has since been applied to public and commercial buildings by the Asbestos School Hazard Abatement Reauthorization Act (ASHARA) in 1994 and by the Occupational Safety and Health Administration's (OSHA) worker protection regulations in 1995, specifically 29 CFR 1926.1101(k).

SWCAA also requires compliance with AHERA's survey and sampling requirements. This applies to any renovation or demolition activities where suspect asbestos-containing material (ACM) may be disturbed. SWCAA is a local agency that receives statutory authority from the U.S. Environmental Protection Agency (EPA) to enforce environmental regulations.

AHERA divides suspect ACM into three categories: "surfacing materials" (i.e., sprayed fireproofing, popcorn ceiling texture, etc.), "thermal system insulation" (TSI) (i.e., pipe or building insulation, etc.), and "miscellaneous materials" (i.e., flooring material, roofing, construction mastics, etc.). The following sections summarize the potential ACMs identified for all three categories; for a complete listing of suspect materials sampled, see **Appendix C**.

Homogeneous material (HM) descriptions in the following text are provided to help correlate material descriptions for identified ACM and other major building components provided in **Appendix C** as sampled by MTNW. Not all tested miscellaneous HMs are detailed below.

Surfacing Materials

There was one surfacing material as defined by 40 CFR 763 identified in the building.

- **Orange peel textured GWB system (HM-03).** This material was observed on the walls in the restrooms (and adjacent south newsroom hallway). Five samples were collected and analyzed for asbestos content; one of the five samples **was determined to contain 2% Chrysotile asbestos in the texture and 2% Chrysotile asbestos in the joint compound**.

Thermal System Insulation

There were several TSI materials as defined by 40 CFR 763 identified in the building. Materials with an * were identified previously in the Hart Crowser survey report.

- Brown paper with black mastic and fiberglass insulation (HM-01). This material was observed above the drop ceiling in the mailroom office. Three samples collected and analyzed for asbestos content; this material was determined to be negative for asbestos.
- Foil duct wrap with mastic over fiberglass (HM-02). This material was observed on the ducting located above the drop ceiling in the office area.

Three samples collected and analyzed for asbestos content; this material was determined to be negative for asbestos.

- **Mudded fittings*.** This material was observed above the drop ceiling in the mailroom. Most of the fittings appear to have been abated, but there may be additional fittings not observed by MTNW.
- Fiberglass pipe insulation*. This material was observed on the pipes throughout most of the building.

Miscellaneous Materials

The miscellaneous materials identified here were determined to be positive for asbestos or assumed to be asbestos containing. For a complete list of all miscellaneous materials sampled please refer to **Appendix C**. Materials with an * were previously identified in the Hart Crowser survey report.

- **Black remnant mastic (HM-19).** This material was observed in the pipe chase closet of the Newsroom restroom located in the southwest corner of the building. There was a very small amount observed affixed to the wood framing. One sample was collected and analyzed of this material for asbestos content; **the remnant mastic was determined to contain 3% Chrysotile asbestos.**
- **Cement board window infill (HM-23).** The exterior windows are aluminum framed. There are cement in-fill panels located above and below the glass windows. Three samples were collected and analyzed for asbestos content; **the panels were determined to contain 15% Chrysotile asbestos.**
- **GWB soffit (HM-25).** The exterior of the office portion of the building has a GWB soffit. Three samples were collected and analyzed for asbestos content. **One of the samples was determined to contain 2% Chrysotile asbestos.**
- **Ceramic floor and wall tile mastic (assumed).** The restrooms in the office area are finished with ceramic floor and wall tiles. Based on the destructive sampling technique and this being for pre-purchase, the ceramic tile mastic in the restrooms is assumed to be asbestos containing until it can be sampled and determined to be negative for asbestos.
- **Roofing (assumed).** The roof of the building is covered with a white sealed membrane type roofing. It appears this roof is newer. It is unclear if there are additional layers of asbestos containing roofing materials present under the sealed membrane roof system. Based on this, the roof of the building is assumed asbestos containing until it can be sampled.

Table 1 summarizes ACM identified in the space surveyed by MTNW. Friability was determined by conditions observed during the survey and by how the material behaves during mechanical demolition.

Table 1. Summary of Asbestos-Containing Materials.

Material	Location	Friable	Quantity**
Orange peel textured GWB system	Restrooms and newsroom south hallway	Yes	3,980 SF
Black remnant mastic	Newsroom restroom mechanical space	No	1 SF
Cement board window infill	Exterior windows (top and bottom infill sections)	No	68 EA 4-x-4-foot 68 EA 2-x-4-foot Total 1,632 SF
GWB soffit	Exterior perimeter soffit	Yes	2,800 SF
Rolled vinyl- (brown with light yellow), pebbled*	Dark rooms, Plate Making, Press room, Vault, Storage	Yes	5,650 SF
Mudded elbows*	Mailroom above drop ceiling (may be other locations as well)	Yes	8 EA (Observed-may be additional fittings hidden)
Roof* (assumed)	Roof	TBD	40,000 SF
Ceramic tile mastic* (assumed)	Restrooms	No	960 SF
Fire doors* (assumed)	Interior and exterior	No	5 EA

EA= each, LF= linear feet, SF= square feet. Materials with * were previously identified as asbestos containing during the Hart Crowser survey. ** Quantities area approximate.

Note: This table is not to be used without the complete survey document including appendices for additional information.

Table 2 lists all suspect materials sampled that have been determined to be non-asbestos containing by MTNW.

Table 2. Summary of Suspect Materials Determined Non-Asbestos Containing

Material Description	Material Description
Brown paper with black mastic and fiberglass batt (HM-01)	Foil duct wrap with mastic over fiberglass (HM-02)
4-inch brown cove base and mastic (brittle) (HM-04)	4-inch black cove base and mastic (HM-05)
4-inch brown cove base and mastic (newer) (HM-06)	4-inch carpet cove mastic (HM-07)

Material Description	Material Description
Tan carpet mastic (HM-08)	12-inch beige mottled VFT with brown and pink/mastic (HM-09)
Tan and white SVF (HM-10)	12-inch tan mottled VFT and mastic (HM-11)
Dark gray SVF (HM-12)	Dark gray with speckles SVF (HM-13)
2-x-4-foot ACT 2-x-2-foot pattern (HM-14)	2-x-4-foot ACT deep crater pattern (off-white) HM-15)
2-x-4-foot ACT pin and crater pattern (HM-16)	2-x-4-foot ACT large crater and pin (white) (HM-17)
2-x-4-foot ACT dot and pin (HM-18)	Sink undercoat (HM's 20, 21, and 22)
Exterior brick mortar (HM-24)	Brown door frame to brick caulk (HM-26)
Gray duct sealant (HM-27)	Remnant black tar on skylights (HM-28

Note: This table is not to be used without the complete survey document including appendices for additional information.

It appears the building underwent a large-scale asbestos abatement project following the 1999 Hart Crowser survey. Project close-out documents were not supplied prior to the MTNW survey to confirm this, but there were obvious indicators that much of the previously identified ACM had been abated. The materials listed below were looked for, but not observed during the MTNW survey.

Table 3. ACM Materials Previously Identified by Hart Crowser but Not Observed by MTNW

Material Description	Material Location
Sprayed-on fireproofing	Press room, Newsprint room, Ink Storage rooms, and Storage room
Brown cove base mastic	South hallway
Ceiling tiles	Press room, Plate making room, Typesetter Room, Library

Note: This table is not to be used without the complete survey document including appendices for additional information.

Lead-Based Paint Summary

Lead was commonly used in most paint products until 1978, when it was banned from residential paints at concentrations greater than 600 parts per million (ppm); however, commercial applications with lead were still utilized and are still available. Lead is poisonous to the human body and presents a potential health hazard during any kind of disturbance (such as maintenance, including grinding, welding, and cutting) and if improperly disposed, where lead can enter drinking water supplies.

EPA defines LBP as a concentration of 1.0 milligrams per centimeter squared (mg/cm^2) or greater by X-ray fluorescence (XRF) or 0.5 percent by weight (% wt.) or greater by total lead analysis; equivalent to 5,000 milligrams per kilogram (mg/kg). This EPA action level triggers requirements for protection of the environment, maintenance workers, and building occupants in child occupied facilities as defined by 40 CFR 745.

Additionally, building components exceeding EPA lead levels may cause demolition waste streams to fail waste designation sampling performed for compliance with WAC 173-303.

Washington Industrial Health and Safety Act (WISHA) worker protection regulations have not defined a minimum concentration for regulating lead, and has clarified that lead at any detectable concentration shall be considered regulated by WAC 296-155-176, Lead. Paint sample results can be expressed in mg/kg (same as ppm), % wt. or mg/cm^2 by area depending on the type of analytical methods used. Any positive result, regardless of the reporting method by the laboratory, will require compliance with WAC 296-155-176.

Lead in Painted Surfaces

Interior and exterior painted surfaces were tested for LBP using bulk sample collection and chemical analysis. A total of seven paint chip samples were collected. Analytical results are provided in **Table 4.**

Table 4 Summary of Bulk Paint Chips Sampled for Lead

Sample Number	Location	Component	Substrate	Color	Result (% wt.)
9110.8-AF-01Pb	Exterior	Soffit	GWB	White	<0.0080
9110.8-AF-02Pb	Retail area	Wall	GWB	Blue	<0.012
9110.8-AF-03Pb	Plate room (storage)	Wall	GWB	Gray	**0.061**
9110.8-AF-04Pb	Plate room	Wall	GWB	Tan	**0.18**
9110.8-AF-05Pb	Press room	Wall	GWB	White	**0.11**
9110.8-AF-06Pb	Press room	Wall	CMU	White	**0.018**
9110.8-AF-07Pb	Retail area	Wall	GWB	Brown	<0.0080

% wt. = percent in weight. **Bolded values** – bulk paint chip samples with lead detected above the laboratory reporting limit have been bolded. The WISHA worker protection regulations have stated that lead at any detectable concentration shall be considered regulated WAC 296-155-176, Lead.

Other Hazardous Building Materials

Chlorofluorocarbons

MTNW inspected the buildings for cooling systems with potential CFCs. There were eight roof top mounted units observed.

PCB Light Ballasts and Fluorescent Light Tubes

Older fluorescent light ballasts have small capacitors that may contain high concentrations of PCBs. Nearly all ballasts manufactured before 1979 contain PCBs. All ballasts manufactured after July 1, 1978 that do not contain PCBs are required to be clearly marked "No PCBs". Unmarked ballasts or ballasts without a date code should

be assumed to be PCB ballasts. PCBs are toxic chemicals according to the EPA. While there is only a small amount, about one ounce, of PCBs in each light ballast capacitor, but there are a large number of ballasts in the United States. About half of the one billion ballasts, estimated as currently installed, were manufactured before 1979 and usually contain PCBs. A "No PCB" label means there are less than 50 ppm PCBs however, in the state of Washington PCB in oils are regulated at 2 ppm (WAC 173-303-9904). Ballasts manufactured after 1978/79 may contain a PCB replacement called Di (2-ethylhexyl) phthalate (DEHP), a probable human carcinogen. DEHP, a clear, odorless, synthetic compound, is often used as a plasticizer. By 1985, most manufacturers had stopped using DEHP in ballasts for 4-foot fixtures but continued to use it for most 8-foot and high intensity discharge fixtures until 1991. In any case, ballasts should not be disassembled for disposal but collected and sent to a treatment, storage or disposal facility certified by the state/EPA for disposal of PCBs and/or DEHP.

Fluorescent light fixtures were observed throughout the building (many in the warehouse were void of bulbs). These fixtures were not inspected for the presence of a PCB light ballasts due to being in use and Ecology's recommendation to properly manage all light ballasts. Therefore, all light fixtures are assumed to contain PCB light ballasts; light tubes are assumed to contain mercury. Additionally high intensity discharge (HID) lights and exit signs may be regulated as universal or hazardous waste and will require dismantling and special handling. **Table 5** provides a summary of these items in the building:

Table 5. Summary of Fluorescent, HID and Exit Lights

Location	8-foot, 2-bulb	4-foot, 4-bulb	4-foot, 2-bulb	Exit	E-lights
Throughout site	38	45	638	13	8
Total	**38**	**45**	**638**	**13**	**8**

Typically, there is one ballast for every two light tubes in a fluorescent light fixture; accordingly, there are approximately 766 ballasts in the light fixtures requiring recycling or PCB hazardous waste disposal. There are also 1,532 light tubes that will need to be recycled during demolition.

PCB in Paints and Caulking

PCBs were used in paint and caulk formulations as drying oils (resins) and plasticizers or softening agents (liquids). Wood, concrete, gypsum wallboard and metal may have painted surfaces containing PCBs.

PCBs were tested in representative paints on the interior of the building. **Table 6** below provides a summary of PCB sample results.

Table 6. Summary of PCB Sample Results

Sample Number	Location	Material	Result (mg/kg*)
9110.8-AF-01PCB	Pressroom	White paint on CMU wall	0.68 Aroclor 1016 0.76 Aroclor 1260
9110.8-AF-02PCB	Plate room	Tan paint on CMU wall	0.63 Aroclor 1016 0.58 Aroclor 1260
9110.8-AF-03PCB	Office areas	White paint on GWB walls	ND

ND= none detected.

Mercury Containing Switches

Heating system thermostats were investigated for mercury containing systems. There were no mercury-containing thermostats observed.

Laboratory Analytical Methods

Asbestos-Containing Materials

Bulk samples were analyzed by Polarized Light Microscopy (PLM) dispersion staining EPA Method 600/R-93/116 by Seattle Asbestos Test, LLC. (SAT). SAT is accredited through the National Voluntary Laboratory Accreditation Program (NVLAP) administered by the National Institute of Standards and Technology (NIST), a division of the U.S. Department of Commerce. This accreditation does not constitute endorsement, but rather a finding of laboratory competence. The NVLAP participant number for SAT is 200768-0 (certification copies are in **Appendix D**). Analytical results are in **Appendix E**.

Lead-Based Paint

Bulk paint chip samples were submitted to EMSL Analytical, Inc. (EMSL), for analysis. A total of seven paint chip samples were analyzed for lead using atomic absorption spectroscopy (AAS) to determine the presence and percentage of lead. Procedures for analyzing metals are found in the American Society of Testing and Materials (ASTM) D-3335-78 and EPA Method Manual SW-846, Method 6010. (EMSL used SW 846 3050B*/7000B) an equivalent analytical method.

Analytical results for paint chip samples are provided in **Appendix F**. EMSL Analytical, Inc., laboratory certification is attached in **Appendix G**.

PCBs

Bulk PCB samples were submitted to On-Site Environmental, Inc., for analysis using gas chromatography (GC) equipped with electron capture detectors (ECD). Samples were analyzed using EPA Method SW-846 8082A. Analytical results are provided in **Appendix H**. On-Site Environmental, Inc. laboratory certification is attached in **Appendix I**.

A sample location drawing is provided in **Appendix J**.

Comments and Recommendations

Asbestos-Containing Materials

Med-Tox Northwest recommends, and state law requires, that all asbestos materials identified in **Table 1** be removed prior to demolition.

Med-Tox Northwest recommends that this survey report be placed on-site during renovation and/or demolition and copies provided to the contractor(s) bidding and performing work. WISHA, OSHA and SWCAA require that the report be on-site and available for review during the entire project duration.

Additional destructive investigation and sampling will be required prior to and during any demolition activities including the following:

1. There were several doors observed in the building that were metal and tagged as fire-rated doors. Prior to any activity that will impact any door or door frame, drill into the doors and door frames to determine if suspect fire protection is located inside.

2. Electrical wire systems (wiring and panel components) were not tested due to occupancy and live electrical loads and will require testing prior to demolition.

3. This survey was conducted as part of pre-purchase due diligence. Due to the limitation of non-destructive investigation, there may be additional suspect materials hidden. Although it is not anticipated that there will be many, prior to demolition or renovation activities, destructive investigation inside walls and ceiling cavities must be performed.

4. There were limited quantities for the materials sampled and determined to be ACM or assumed to be ACM. At the time of the survey these materials were found to be in good condition and do not pose a health concern or hazard to occupants.

5. There were several asbestos containing materials identified during previous survey activities. Not all materials identified in the Hart Crowser report were observed during the MTNW survey. Small quantities of these materials may still be hidden. Although not anticipated, if they are discovered they must be abated prior to any activities that may impact them.

Lead-Based Paint

For lead, any percentage of lead in the material should be an assumed risk to human health. All painted surfaces should be assumed to contain at least trace levels of lead in paint, therefore requiring compliance with WAC 296-155-176 during any disturbance of painted surfaces. The WISHA criteria are used to determine if materials are hazardous during a demolition.

Disposal options under WAC 173-303 are also determined by whether the material contains lead. Based on the results of the samples collected for lead, a toxicity characterization leachate procedure (TCLP) should be collected to determine where the waste stream can be disposed of (general construction debris or hazardous). The contractor should collect this sample after the waste stream has been established and all recyclables have been segregated from materials that will be sent off for disposal.

PCB

There were two samples collected and analyzed for PCB's that were determined to contain detectable PCB's (<50 ppm). These materials can be disposed of in a Resource Conservation and Recovery Act (RCRA) subtitle D landfill. Since the PCB content is so low, it is un-likely that PCB contamination is present in the surrounding substrates.

Work procedures for proper removal and protection of workers should be provided to contractors in accordance with WAC 296-155 and WAC 296-841. This includes Hazardous Communications training as it pertains to PCB's considered a remediation waste.

During demolition, the asbestos abatement contractor should be tasked with dismantling light fixtures, collecting all lighting ballasts for proper disposal, and recycling the light tubes. Ballasts without "No-PCB" labels are considered PCB-containing and must be disposed as a hazardous waste. "No-PCB" ballasts may designate as Washington Dangerous Waste and should be sent to an EPA licensed facility for proper disposal. Light tubes can be recycled as a universal waste for minimal cost or must be disposed as a hazardous waste.

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Other Hazardous Building Materials

Fluorescent light tubes contain mercury and can be recycled as a universal waste for minimal cost. Additionally, emergency lights and exit signs may be regulated as universal or hazardous waste and will require dismantling and special handling. Roof top units with CFC's must be drained prior to demolition of the structure.

Limitations

A good faith effort has been made to identify ACM, LBP, and other HBM of the site located at 770 11th Avenue in Longview, Washington. This survey was performed for pre-purchase; destructive investigation was only performed on a limited basis. Additional destructive investigation and sampling will be required depending on inaccessible building systems including mechanical spaces and/or mechanical/electrical system routing.

Sampling was performed consistent with the level of care and skill ordinarily exercised by professionals currently practicing under similar conditions in the area. No other warranty, expressed or implied, is made.

This report has been prepared for the exclusive use of Haley & Aldrich, Inc. and its designates for this project only. The analyses, conclusions, and recommendations presented in this report are based on conditions encountered at the time of our survey and our experience and judgment. MTNW cannot be held responsible for interpretation by others of the data contained in this report; any use of this report shall include the entire document. This survey is not intended for use as abatement plans and/or specifications which MTNW recommends for regulatory compliance.

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Appendix A
AHERA Building Inspector and WDOC Lead Certificates

STATE OF WASHINGTON

Department of Commerce

Lead-Based Paint Activities Program

Anthony L Fullerton

Has fulfilled the certification requirements of WAC 365-230 and has been certified to conduct lead based paint activities as a ***Risk Assessor.***

Certification #	Issuance Date	Expiration Date
0242	06/21/2023	04/03/2026

Certificate of Completion

This is to certify that

Anthony L. Fullerton

has satisfactorily completed
4 hours of online refresher training as an

AHERA Building Inspector

to comply with the training requirements of

TSCA Title II, 40 CFR 763 (AHERA)

EPA Provider # 1085

190507
Certificate Number

Instructor: David Welch

Aug 22, 2023 Expires in 1 year.
Date(s) of Training

Exam Score: N/A
(if applicable)

Terracon
Explore with us

- Facilities
- Environmental
- Geotechnical
- Materials

Appendix B
Building and Building System Photographic Documentation

Photo 1: Exterior of the building facing southwest.

Photo 2: Exterior of the building facing southeast. The white window infill panels are cement asbestos board. The GWB soffit is also asbestos containing.

Photo 3: Warehouse space facing northwest.

Photo 4: Roof of the building facing west. The roof is assumed ACM as it was unclear if existing layers of roofing are present underneath the white sealed membrane.

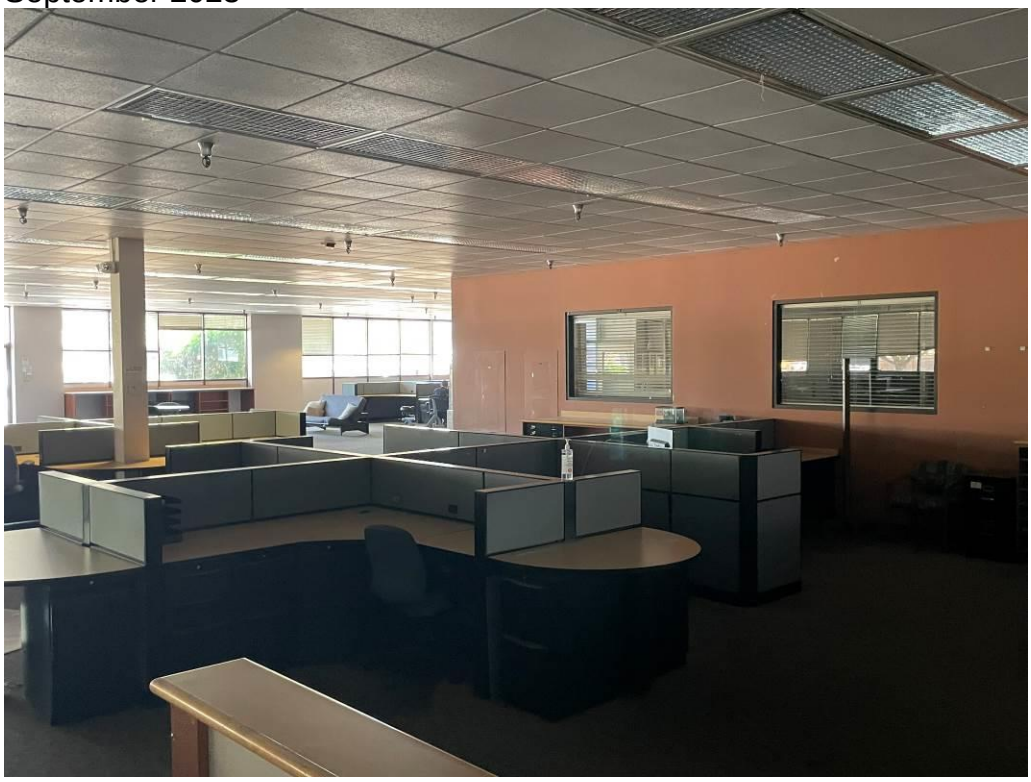

Photo 5: Typical finishes observed in the main office area.

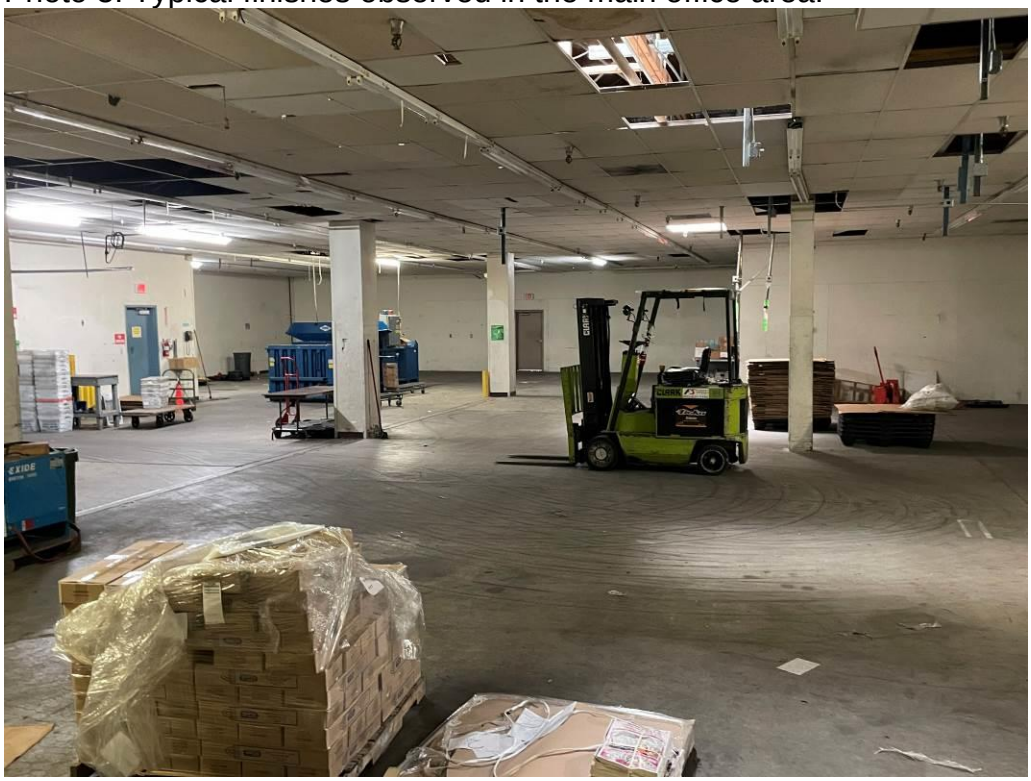

Photo 6: Mailroom facing south. The ACT previously identified as ACM has been removed. All samples collected from the ACT were negative for asbestos.

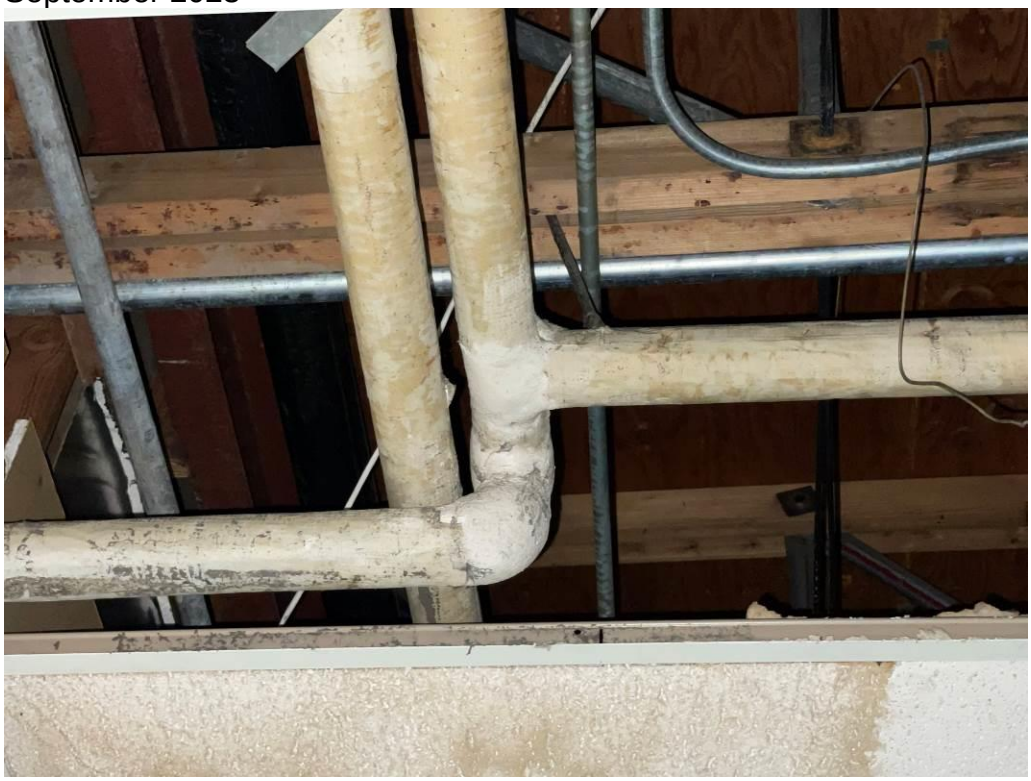

Photo 7: Asbestos containing mudded pipe fittings observed above the drop ceiling in the Mailroom.

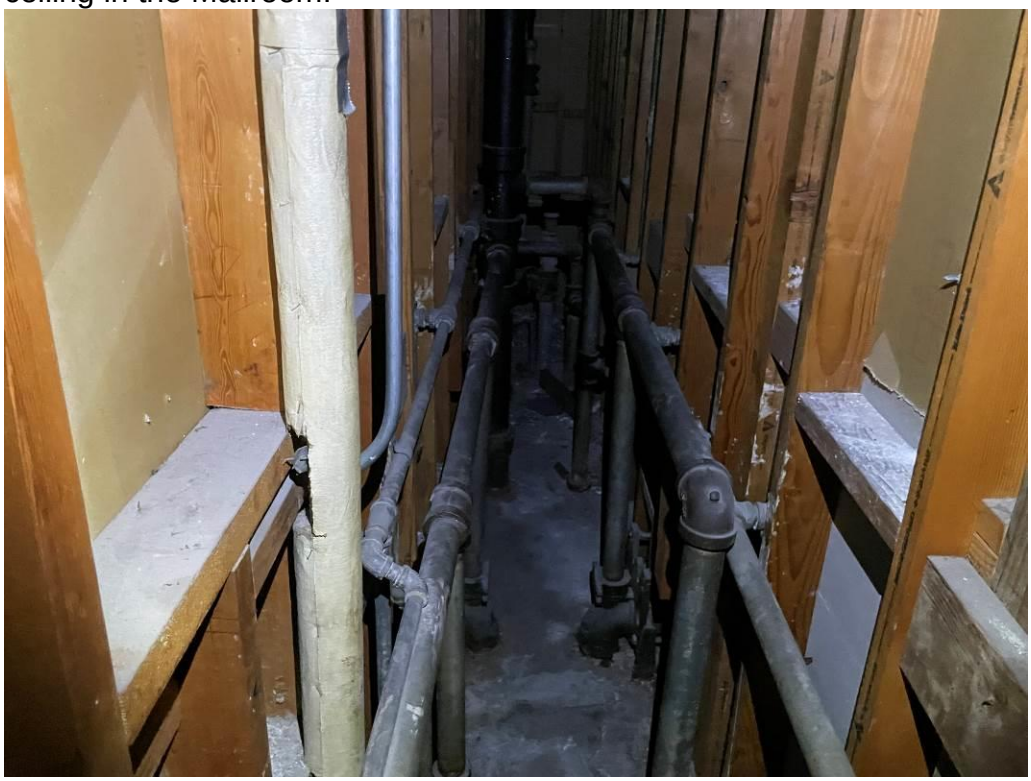

Photo 8: Mechanical chase closet located between the restrooms. The previously identified ACM pipe fitting insulation has been abated.

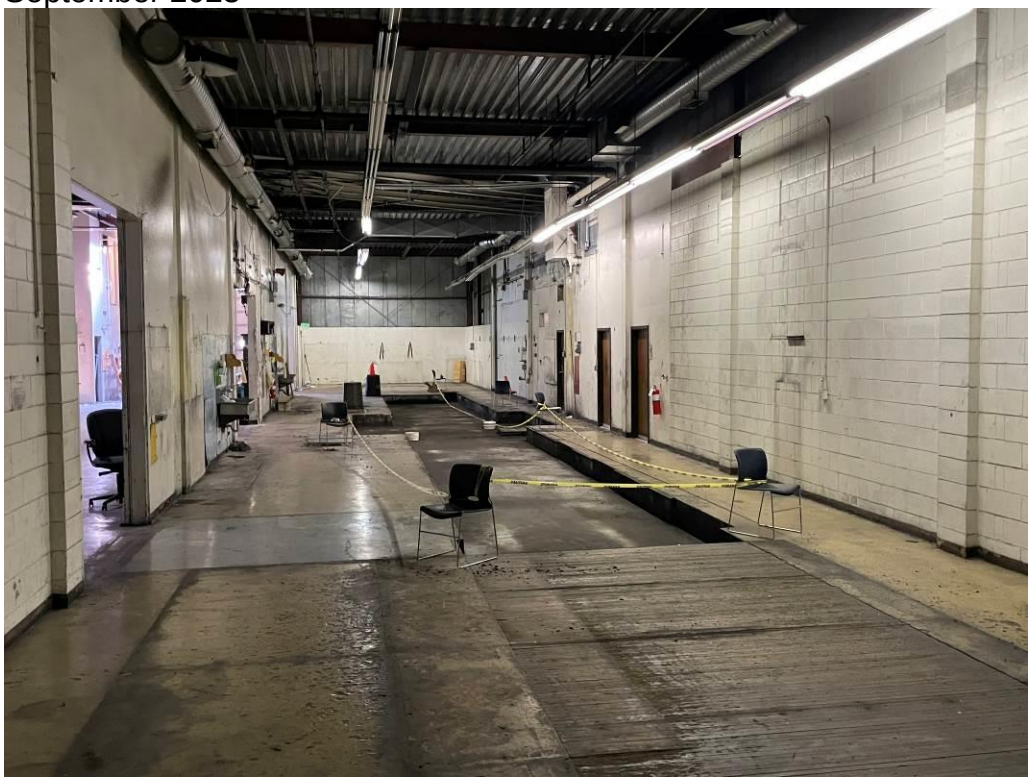

Photo 9: Press Room facing east. The SVF on the floor is asbestos containing.

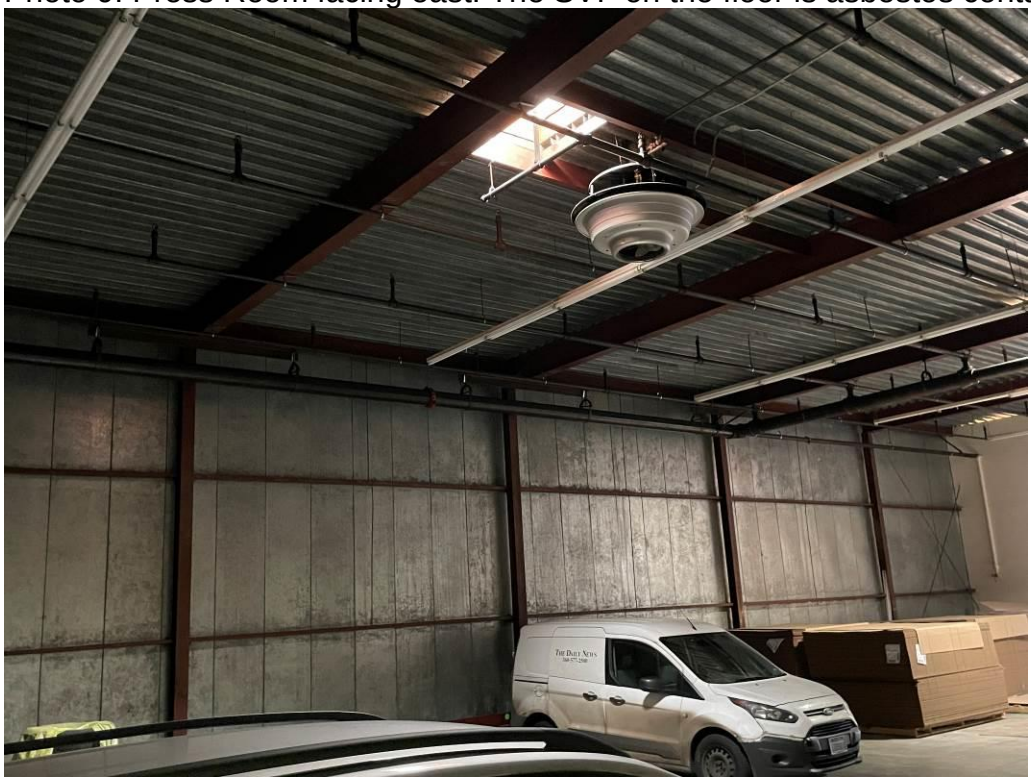

Photo 10: Reel Room facing southeast. The walls and ceiling were previously identified to have ACM spray-on fireproofing. There was none observed.

Photo 11: Assumed asbestos containing ceramic floor and wall tile mastic located in the restrooms.

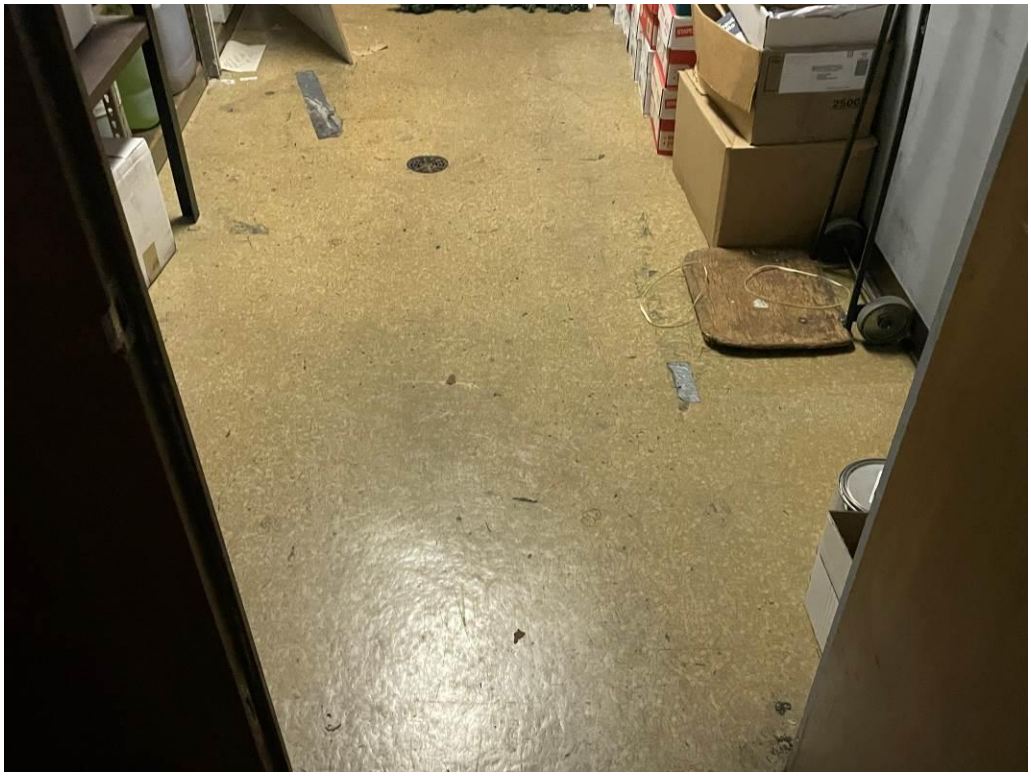

Photo 12: Asbestos containing SVF in the Plate Making storage room.

Photo 13: Lunchroom facing east. The VFT and mastic are negative for asbestos.

Appendix C
Summary of Materials Sampled for Asbestos

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-001	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	ND
9110.8-AF-002	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	ND
9110.8-AF-003	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	ND
9110.8-AF-004	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	ND
9110.8-AF-005	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	ND
9110.8-AF-006	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	ND
9110.8-AF-007	Orange peel textured GWB system	North restrooms	Surfacing	03	ND
9110.8-AF-008	Orange peel textured GWB system	North restrooms	Surfacing	03	**Layer 1: 2% CHR** **Layer 2: 2% CHR**
9110.8-AF-009	Orange peel textured GWB system	Hall by newsroom restroom	Surfacing	03	ND
9110.8-AF-010	Orange peel textured GWB system	Mailroom restroom	Surfacing	03	ND
9110.8-AF-011	Orange peel textured GWB system	South office restroom	Surfacing	03	ND
9110.8-AF-012	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	ND
9110.8-AF-013	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	ND

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-014	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	ND
9110.8-AF-015	4-inch black cove base and mastic	Lunchroom	Misc	05	ND
9110.8-AF-016	4-inch black cove base and mastic	Hall	Misc	05	ND
9110.8-AF-017	4-inch black cove base and mastic	Hall	Misc	05	ND
9110.8-AF-018	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	ND
9110.8-AF-019	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	ND
9110.8-AF-020	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	ND
9110.8-AF-021	4-inch carpet cove mastic	South hall	Misc	07	ND
9110.8-AF-022	4-inch carpet cove mastic	Newsroom	Misc	07	ND
9110.8-AF-023	4-inch carpet cove mastic	Main conference room	Misc	07	ND
9110.8-AF-024	Tan carpet mastic	Lunchroom (small section)	Misc.	08	ND
9110.8-AF-025	Tan carpet mastic	South hallway	Misc.	08	ND
9110.8-AF-026	Tan carpet mastic	Newsroom	Misc.	08	ND
9110.8-AF-027	12-inch beige mottled VFT with brown and pink/mastic	Hall	Misc.	09	ND
9110.8-AF-028	12-inch beige mottled VFT with brown and pink/mastic	Lunchroom	Misc.	09	ND

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-029	12-inch beige mottled VFT with brown and pink/mastic	Lunchroom	Misc.	09	ND
9110.8-AF-030	Tan and white SVF	Plate making room	Misc.	10	ND
9110.8-AF-031	Tan and white SVF	Plate making room	Misc.	10	ND
9110.8-AF-032	Tan and white SVF	Plate making room	Misc.	10	ND
9110.8-AF-033	12-inch tan mottled VFT and mastic	Mailroom office	Misc.	11	ND
9110.8-AF-034	12-inch tan mottled VFT and mastic	Mailroom office	Misc.	11	ND
9110.8-AF-035	Dark gray SVF	Men's restroom (Pressroom)	Misc.	12	ND
9110.8-AF-036	Dark gray SVF	Men's restroom (Pressroom)	Misc.	12	ND
9110.8-AF-037	Dark gray with speckles SVF	Women's restroom (pressroom)	Misc.	13	ND
9110.8-AF-038	Dark gray with speckles SVF	Women's restroom (pressroom)	Misc.	13	ND
9110.8-AF-039	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	ND
9110.8-AF-040	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	ND
9110.8-AF-041	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	ND
9110.8-AF-042	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	ND
9110.8-AF-043	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	ND

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-044	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	ND
9110.8-AF-045	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	ND
9110.8-AF-046	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	ND
9110.8-AF-047	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	ND
9110.8-AF-048	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	ND
9110.8-AF-049	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	ND
9110.8-AF-050	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	ND
9110.8-AF-051	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	ND
9110.8-AF-052	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	ND
9110.8-AF-053	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	ND
9110.8-AF-054	**Black remnant mastic**	**Newsroom restroom mechanical space**	**Misc.**	**19**	**3% CHR**
9110.8-AF-055	Sink undercoat	Newsroom sink	Misc.	20	ND
9110.8-AF-056	Sink undercoat	Retail area sink	Misc.	21	ND
9110.8-AF-057	Sink undercoat	Lunchroom sink	Misc.	22	ND
Exterior					
9110.8-AF-058	**Cement board window infill**	**Damage window by south entrance**	**Misc.**	**23**	**15% CHR**
9110.8-AF-059	**Cement board window infill**	**Damage window by south entrance**	**Misc.**	**23**	**15% CHR**

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-060	**Cement board window infill**	**Damage window by south entrance**	**Misc.**	**23**	**15% CHR**
9110.8-AF-061	Exterior brick mortar	Exterior walls	Misc.	24	ND
9110.8-AF-062	Exterior brick mortar	Exterior walls	Misc.	24	ND
9110.8-AF-063	Exterior brick mortar	Exterior walls	Misc.	24	ND
9110.8-AF-064	GWB soffit	Building perimeter (damaged areas on the north side)	Misc.	25	ND
9110.8-AF-065	**GWB soffit**	**Building perimeter (damaged areas on the north side)**	**Misc.**	**25**	**2% CHR**
9110.8-AF-066	GWB soffit	Building perimeter (damaged areas on the north side)	Misc.	25	ND
9110.8-AF-067	Brown door frame to brick caulk	Exterior doors	Misc	26	ND
9110.8-AF-068	Brown door frame to brick caulk	Exterior doors	Misc	26	ND
9110.8-AF-069	Gray duct sealant	Roof	Misc.	27	ND
9110.8-AF-070	Gray duct sealant	Roof	Misc.	27	ND
9110.8-AF-071	Remnant black tar on skylights	Roof	Misc.	28	ND
9110.8-AF-072	Remnant black tar on skylights	Roof	Misc.	28	ND

ACT = acoustical ceiling tile, CHR = Chrysotile, GWB = gypsum wallboard, HM = homogeneous material, Misc. = Miscellaneous, ND = None detect, SVF = sheet vinyl flooring, TSI = Thermal System Insulation, VFT = vinyl floor tile.

Appendix D
National Voluntary Laboratory Accreditation Program Certificate

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200768-0

Seattle Asbestos Test, LLC

Lynnwood, WA

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

Asbestos Fiber Analysis

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017. This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2022-10-01 through 2023-09-30

Effective Dates

For the National Voluntary Laboratory Accreditation Program

Appendix E
Analytical Report- Asbestos

SEATTLE ASBESTOS TEST, LLC

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

www.seattleasbestostest.com, admin@seattleasbestostest.com

Project Manager:	Anthony Fullerton
Client:	Med-Tox, Northwest
Address:	PO Box 1446, Auburn, WA 98071-1446
Tel:	253.351.0677
Date Report Issued:	8/28/2023

Date Analyzed:	8/28/2023
Client Job#:	9110.8
Project Location:	770 11th Ave Longview WA
Laboratory batch#:	202212968
Samples Received:	72

Enclosed please find the test results for the bulk samples submitted to our laboratory for asbestos analysis. Analysis was performed using polarized light microscopy (PLM) in accordance with Test Method US EPA - 40 CFR Appendix E of Part 763, Interim Method of Determination of Asbestos in Bulk Insulation Samples and Test Method US EPA/600/R-93/116.

Percentages for this report are done by visual estimate and relate to the suggested acceptable error ranges by the method. Since variation in data increases as the quantity of asbestos decreases toward the limit of detection, the EPA recommends point counting for samples containing between <1% and 10% asbestos (NESHAP, 40 CFR Part 61). Statistically, point counting is a more accurate method. If you feel a point count might be beneficial, please feel free to call and request one.

The test results refer only to the samples or items submitted and tested. The accuracy with which these samples represent the actual materials is totally dependent on the acuity of the person who took the samples. This report must not be used by the client to claim product certification, approval, or endorsement by Seattle Asbestos Test, LLC, NVLAP, NIST, or any agency of the Federal government. The test report or calibration certificate shall not be reproduced except in full, without written approval of the laboratory. If the sample is inhomogeneous the sub-samples of the components are analyzed separately as layers.This report in its entirety consists of this cover leter, the customer sampling COC or data sheet, and the analytical report which is page numbered.

This report is highly confidential and will not be released without your consent. Samples are archived for 30 days after the analysis, and disposed of as hazardous waste thereafter.

Thank you for using our service and let us know if we can further assist you.

Sincerely

SZhang

Steve (Fanyao) Zhang
Approved Signatory

20221968

SEATTLE ASBESTOS TEST, LLC

Analyzing Quality

Lynnwood Lab: 19711 Scriber Lake Road, Suite D, WA 98036, Tel:425.673.9850, Fax:425.673.9810
Bellevue Lab: 12727 Northup Way, Suite 1, Bellevue, WA 98005, Tel:425.861.1111, Fax:425.861.1118
Email: admin@seattleasbestostest.com, Website: www.seattleasbestostest.com

CHAIN OF CUSTODY

☒ Bulk Asbestos ☐ 1 Hour ☐ Point Count 400 ☐ 2 Hours ☐ Point Count 1000 ☐ Same day (4 to 6 Hrs.) ☐ Point Count Gravimetric ☐ 1 Day ☒ Other (Specify) 5 Days

Med-Tox, Northwest

PO Box 1446, Auburn, WA 98071-1446 Tel: 253.351.0677 Fax: 253.351.0688

Number of Samples 72 PO# 9110.8 Project Location 770 11th Ave, Longview, WA

Project Manager (Check one or more):

☑	Anthony Fullerton	206.356.8927	fullertona@medtoxnw.com	☐	evansc@medtoxnw.com
☐	Ginnie Kindler		kindlerg@medtoxnw.com	☐ Jon Havelock	havelockj@medtoxnw.com
☐	Judy Lurvey		lurveyj@medtoxnw.com	☐ Teresa Choate	choatet@medtoxnw.com

SEQ#	CLIENT SAMPLE #	SAMPLE DESCRIPTION	LOCATION	NOTES
1	9110.8-AF-001			
2				
3				
4				
5				
6				
7				
8				
9				
10		See Table		
11				
12				
13				
14				
15				
16				
17				
18				
19				
20	9110.8-AF-072			

	Print Name	Signature	Company	Date	Time
Sampled:	A Fullerton		Med-Tox, Northwest	8/24/23	
Relinquished:	A Fullerton		Med-Tox, Northwest	8/25/23	
Delivered:			Med-Tox, Northwest		
Received:			Seattle Asbestos Test	8/28/23	12:10
Analyzed:			Seattle Asbestos Test	8/28/23	12:30
Reported:			Seattle Asbestos Test		

Results reporting method: ☐ Phone ☐ Fax ☐ Email ☐ Pick-up

☐ Composite all wallboard samples ☐ Text result to phone ☐ Point count ..... % or less asbestos

20221296 8

Table C-1. Summary of Materials Sampled for Asbestos

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-001	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	
9110.8-AF-002	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	
9110.8-AF-003	Brown paper with black mastic and fiberglass batt	Above drop ceiling mail room office	TSI	01	
9110.8-AF-004	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	
9110.8-AF-005	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	
9110.8-AF-006	Foil duct wrap with mastic over fiberglass	Ducting above drop ceiling- office area	TSI	02	
9110.8-AF-007	Orange peel textured GWB system	North restrooms	Surfacing	03	
9110.8-AF-008	Orange peel textured GWB system	North restrooms	Surfacing	03	
9110.8-AF-009	Orange peel textured GWB system	Hall by newsroom restroom	Surfacing	03	
9110.8-AF-010	Orange peel textured GWB system	Mailroom restroom	Surfacing	03	
9110.8-AF-011	Orange peel textured GWB system	South office restroom	Surfacing	03	
9110.8-AF-012	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	
9110.8-AF-013	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	

20221296 8

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-014	4-inch brown cove base and mastic (brittle)	Pressroom	Misc.	04	
9110.8-AF-015	4-inch black cove base and mastic	Lunchroom	Misc	05	
9110.8-AF-016	4-inch black cove base and mastic	Hall	Misc	05	
9110.8-AF-017	4-inch black cove base and mastic	Hall	Misc	05	
9110.8-AF-018	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	
9110.8-AF-019	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	
9110.8-AF-020	4-inch brown cove base and mastic (newer)	Plate room office	Misc.	06	
9110.8-AF-021	4-inch carpet cove mastic	South hall	Misc	07	
9110.8-AF-022	4-inch carpet cove mastic	Newsroom	Misc	07	
9110.8-AF-023	4-inch carpet cove mastic	Main conference room	Misc	07	
9110.8-AF-024	Tan carpet mastic	Lunchroom (small section)	Misc.	08	
9110.8-AF-025	Tan carpet mastic	South hallway	Misc.	08	
9110.8-AF-026	Tan carpet mastic	Newsroom	Misc.	08	
9110.8-AF-027	12-inch beige mottled VFT with brown and pink/mastic	Hall	Misc.	09	
9110.8-AF-028	12-inch beige mottled VFT with brown and pink/mastic	Lunch room	Misc.	09	

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-029	12-inch beige mottled VFT with brown and pink/mastic	Lunchroom	Misc.	09	
9110.8-AF-030	Tan and white SVF	Plate making room	Misc.	10	
9110.8-AF-031	Tan and white SVF	Plate making room	Misc.	10	
9110.8-AF-032	Tan and white SVF	Plate making room	Misc.	10	
9110.8-AF-033	12-inch tan mottled VFT and mastic	Mailroom office	Misc.	11	
9110.8-AF-034	12-inch tan mottled VFT and mastic	Mailroom office	Misc.	11	
9110.8-AF-035	Dark gray SVF	Men's restroom (Pressroom)	Misc.	12	
9110.8-AF-036	Dark gray SVF	Men's restroom (Pressroom)	Misc.	12	
9110.8-AF-037	Dark gray with speckles SVF	Women's restroom (pressroom)	Misc.	13	
9110.8-AF-038	Dark gray with speckles SVF	Women's restroom (pressroom)	Misc.	13	
9110.8-AF-039	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	
9110.8-AF-040	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	
9110.8-AF-041	2-x-4-foot ACT 2-x-2-foot pattern	Main office areas	Misc.	14	
9110.8-AF-042	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	
9110.8-AF-043	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-044	2-x-4-foot ACT deep crater pattern (off-white)	Mailroom	Misc.	15	
9110.8-AF-045	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	
9110.8-AF-046	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	
9110.8-AF-047	2-x-4-foot ACT pin and crater pattern	Mailroom	Misc.	16	
9110.8-AF-048	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	
9110.8-AF-049	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	
9110.8-AF-050	2-x-4-foot ACT large crater and pin (white)	Mailroom	Misc.	17	
9110.8-AF-051	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	
9110.8-AF-052	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	
9110.8-AF-053	2-x-4-foot ACT dot and pin	Mailroom	Misc.	18	
9110.8-AF-054	Black remnant mastic	Newsroom restroom mechanical space	Misc.	19	
9110.8-AF-055	Sink undercoat	Newsroom sink	Misc.	20	
9110.8-AF-056	Sink undercoat	Retail area sink	Misc.	21	
9110.8-AF-057	Sink undercoat	Lunchroom sink	Misc.	22	
Exterior					
9110.8-AF-058	Cement board window infill	Damage window by south entrance	Misc.	23	
9110.8-AF-059	Cement board window infill	Damage window by south entrance	Misc.	23	
9110.8-AF-060	Cement board window infill	Damage window by south entrance	Misc.	23	
9110.8-AF-061	Exterior brick mortar	Exterior walls	Misc.	24	

Sample	Material	Location	AHERA Type	HM	Result
9110.8-AF-062	Exterior brick mortar	Exterior walls	Misc.	24	
9110.8-AF-063	Exterior brick mortar	Exterior walls	Misc.	24	
9110.8-AF-064	GWB soffit	Building perimeter (damaged areas on the north side)	Misc.	25	
9110.8-AF-065	GWB soffit	Building perimeter (damaged areas on the north side)	Misc.	25	
9110.8-AF-066	GWB soffit	Building perimeter (damaged areas on the north side)	Misc.	25	
9110.8-AF-067	Brown door frame to brick caulk	Exterior doors	Misc	26	
9110.8-AF-068	Brown door frame to brick caulk	Exterior doors	Misc	26	
9110.8-AF-069	Gray duct sealant	Roof	Misc.	27	
9110.8-AF-070	Gray duct sealant	Roof	Misc.	27	
9110.8-AF-071	Remnant black tar on skylights	Roof	Misc.	28	
9110.8-AF-072	Remnant black tar on skylights	Roof	Misc.	28	

CHR = Chrysotile, GWB = gypsum wallboard, HM = homogeneous material, Misc. = Miscellaneous, ND = None detect, SVF = sheet vinyl flooring, TSI = Thermal System Insulation, VFT = vinyl floor tile.

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton
Client: Med-Tox, Northwest
Address: PO Box 1446, Auburn, WA 98071-1446
Job#: 9110.8
Batch#: 202212968
Date Received: 8/25/2023
Samples Rec'd: 72
Date Analyzed: 8/28/2023
Samples Analyzed: 72
Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang
Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
1	9110.8-AF-001	1	Brown paper with black mastic		None detected	Filler, Asphalt/binder	70	Cellulose
		2	Yellow fibrous material		None detected	Filler	90	Glass fibers
2	9110.8-AF-002	1	Brown paper with black mastic		None detected	Filler, Asphalt/binder	69	Cellulose
		2	Yellow fibrous material		None detected	Filler	89	Glass fibers
3	9110.8-AF-003	1	Brown paper with black mastic		None detected	Filler, Asphalt/binder	71	Cellulose
		2	Yellow fibrous material		None detected	Filler	91	Glass fibers
4	9110.8-AF-004	1	Silver foil		None detected	Foil/binder		None detected
		2	Tan paper with mastic and woven fibrous material		None detected	Filler, Mastic/binder	67	Cellulose, Glass fibers
		3	Yellow fibrous material		None detected	Filler	89	Glass fibers
5	9110.8-AF-005	1	Silver foil		None detected	Foil/binder		None detected
		2	Tan paper with mastic and woven fibrous material		None detected	Filler, Mastic/binder	68	Cellulose, Glass fibers
		3	Yellow fibrous material		None detected	Filler	90	Glass fibers
6	9110.8-AF-006	1	Silver foil		None detected	Foil/binder		None detected
		2	Tan paper with mastic and woven fibrous material		None detected	Filler, Mastic/binder	68	Cellulose, Glass fibers
		3	Yellow fibrous material		None detected	Filler	91	Glass fibers
7	9110.8-AF-007	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
8	9110.8-AF-008	1	White powdery material with paint	2	Chrysotile	Binder/filler, Paint	5	Cellulose
		2	White powdery material with paint	2	Chrysotile	Binder/filler, Paint	5	Cellulose
9	9110.8-AF-009	1	White powdery material with paint and paper		None detected	Binder/filler, Paint	35	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	25	Cellulose

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton
Client: Med-Tox, Northwest
Address: PO Box 1446, Auburn, WA 98071-1446
Job#: 9110.8
Batch#: 202212968
Date Received: 8/25/2023
Samples Rec'd: 72
Date Analyzed: 8/28/2023
Samples Analyzed: 72
Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang
Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
10	9110.8-AF-010	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	24	Cellulose
11	9110.8-AF-011	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
		2	White chalky material with paper		None detected	Binder/filler, Gypsum/binder	26	Cellulose
12	9110.8-AF-012	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Tan mastic		None detected	Mastic/binder	2	Cellulose
		3	Trace gray brittle material		None detected	Filler, Binder	2	Cellulose
13	9110.8-AF-013	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Tan mastic		None detected	Mastic/binder	3	Cellulose
		3	Trace gray brittle material		None detected	Filler, Binder	2	Cellulose
14	9110.8-AF-014	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Tan mastic		None detected	Mastic/binder	3	Cellulose
		3	Trace gray brittle material		None detected	Filler, Binder	2	Cellulose
15	9110.8-AF-015	1	Black rubbery material		None detected	Rubber/binder	2	Cellulose
		2	White mastic		None detected	Mastic/binder	2	Cellulose
16	9110.8-AF-016	1	Black rubbery material		None detected	Rubber/binder	3	Cellulose
		2	White mastic		None detected	Mastic/binder	3	Cellulose
17	9110.8-AF-017	1	Black rubbery material		None detected	Rubber/binder	2	Cellulose
		2	White mastic		None detected	Mastic/binder	3	Cellulose
18	9110.8-AF-018	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Yellow mastic with paint		None detected	Mastic/binder, Paint	2	Cellulose
19	9110.8-AF-019	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Yellow mastic with paint		None detected	Mastic/binder, Paint	3	Cellulose

SEATTLE ASBESTOS TEST

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton **Client:** Med-Tox, Northwest **Address:** PO Box 1446, Auburn, WA 98071-1446

Job#: 9110.8 **Batch#:** 202212968 **Date Received:** 8/25/2023

Samples Rec'd: 72 **Date Analyzed:** 8/28/2023 **Samples Analyzed:** 72

Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang

SZhang

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
20	9110.8-AF-020	1	Brown rubbery material		None detected	Rubber/binder	2	Cellulose
		2	Yellow mastic with paint		None detected	Mastic/binder, Paint	4	Cellulose
21	9110.8-AF-021	1	Yellow mastic		None detected	Mastic/binder	5	Synthetic fibers, Cellulose
22	9110.8-AF-022	1	Yellow mastic		None detected	Mastic/binder	4	Synthetic fibers, Cellulose
23	9110.8-AF-023	1	Yellow mastic		None detected	Mastic/binder	6	Synthetic fibers, Cellulose
24	9110.8-AF-024	1	Tan mastic		None detected	Mastic/binder	5	Synthetic fibers, Cellulose
25	9110.8-AF-025	1	Tan mastic		None detected	Mastic/binder	4	Synthetic fibers, Cellulose
26	9110.8-AF-026	1	Tan mastic		None detected	Mastic/binder	5	Synthetic fibers, Cellulose
27	9110.8-AF-027	1	Beige tile		None detected	Vinyl/binder, Mineral grains	2	Cellulose
		2	Trace brown/pink mastic		None detected	Mastic/binder	4	Cellulose
28	9110.8-AF-028	1	Beige tile		None detected	Vinyl/binder, Mineral grains	3	Cellulose
		2	Trace brown/pink mastic		None detected	Mastic/binder	4	Cellulose
29	9110.8-AF-029	1	Beige tile		None detected	Vinyl/binder, Mineral grains	2	Cellulose
		2	Trace brown/pink mastic		None detected	Mastic/binder	3	Cellulose
30	9110.8-AF-030	1	Beige sheet vinyl		None detected	Vinyl/binder		None detected
		2	White fibrous material with mastic		None detected	Binder/filler, Mastic/binder	65	Cellulose
31	9110.8-AF-031	1	Beige sheet vinyl		None detected	Vinyl/binder		None detected
		2	White fibrous material with mastic		None detected	Binder/filler, Mastic/binder	64	Cellulose
32	9110.8-AF-032	1	Beige sheet vinyl		None detected	Vinyl/binder		None detected
		2	White fibrous material with mastic		None detected	Binder/filler, Mastic/binder	63	Cellulose
33	9110.8-AF-033	1	Tan tile		None detected	Vinyl/binder, Mineral grains	2	Cellulose

SEATTLE ASBESTOS TEST

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples;
[PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton
Client: Med-Tox, Northwest
Address: PO Box 1446, Auburn, WA 98071-1446
Job#: 9110.8
Batch#: 202212968
Date Received: 8/25/2023
Samples Rec'd: 72
Date Analyzed: 8/28/2023
Samples Analyzed: 72
Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang
Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
33	9110.8-AF-033	2	Yellow mastic		None detected	Mastic/binder	6	Synthetic fibers, Cellulose
34	9110.8-AF-034	1	Tan tile		None detected	Vinyl/binder, Mineral grains	2	Cellulose
		2	Yellow mastic		None detected	Mastic/binder	5	Synthetic fibers, Cellulose
35	9110.8-AF-035	1	Dark gray sheet vinyl		None detected	Vinyl/binder		None detected
		2	Gray fibrous material with mastic		None detected	Binder/filler, Mastic/binder	65	Cellulose
36	9110.8-AF-036	1	Dark gray sheet vinyl		None detected	Vinyl/binder		None detected
		2	Gray fibrous material with mastic		None detected	Binder/filler, Mastic/binder	64	Cellulose
37	9110.8-AF-037	1	Dark gray sheet vinyl		None detected	Vinyl/binder		None detected
		2	Tan fibrous material with mastic		None detected	Binder/filler, Mastic/binder	63	Cellulose
38	9110.8-AF-038	1	Dark gray sheet vinyl		None detected	Vinyl/binder		None detected
		2	Tan fibrous material with mastic		None detected	Binder/filler, Mastic/binder	64	Cellulose
39	9110.8-AF-039	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
40	9110.8-AF-040	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	66	Cellulose
41	9110.8-AF-041	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	63	Cellulose
42	9110.8-AF-042	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
43	9110.8-AF-043	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	64	Cellulose
44	9110.8-AF-044	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	63	Cellulose
45	9110.8-AF-045	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
46	9110.8-AF-046	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	66	Cellulose
47	9110.8-AF-047	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
48	9110.8-AF-048	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	64	Cellulose

SEATTLE ASBESTOS TEST

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ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton | Client: Med-Tox, Northwest | Address: PO Box 1446, Auburn, WA 98071-1446

Job#: 9110.8 | Batch#: 202212968 | Date Received: 8/25/2023

Samples Rec'd: 72 | Date Analyzed: 8/28/2023 | Samples Analyzed: 72

Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang

SZhang

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
49	9110.8-AF-049	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
50	9110.8-AF-050	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	63	Cellulose
51	9110.8-AF-051	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	64	Cellulose
52	9110.8-AF-052	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	65	Cellulose
53	9110.8-AF-053	1	Gray fibrous material with paint		None detected	Paint, Filler, Perlite	66	Cellulose
54	9110.8-AF-054	1	Black asphaltic material	3	Chrysotile	Asphalt/binder	3	Cellulose
55	9110.8-AF-055	1	White soft/loose material		None detected	Filler, Fine particles	5	Cellulose
56	9110.8-AF-056	1	White soft/loose material		None detected	Filler, Fine particles	4	Cellulose
57	9110.8-AF-057	1	White soft/loose material		None detected	Filler, Fine particles	5	Cellulose
58	9110.8-AF-058	1	Gray cementitious material with paint	15	Chrysotile	Cement/binder, Paint	5	Cellulose
59	9110.8-AF-059	1	Gray cementitious material with paint	15	Chrysotile	Cement/binder, Paint	4	Cellulose
60	9110.8-AF-060	1	Gray cementitious material with paint	15	Chrysotile	Cement/binder, Paint	5	Cellulose
61	9110.8-AF-061	1	Gray sandy/brittle material		None detected	Sand, Filler, Binder	3	Cellulose
62	9110.8-AF-062	1	Gray sandy/brittle material		None detected	Sand, Filler, Binder	4	Cellulose
63	9110.8-AF-063	1	Gray sandy/brittle material		None detected	Sand, Filler, Binder	2	Cellulose
64	9110.8-AF-064	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
65	9110.8-AF-065	1	White powdery material with paint	2	Chrysotile	Binder/filler, Paint	5	Cellulose
66	9110.8-AF-066	1	White powdery material with paint		None detected	Binder/filler, Paint	5	Cellulose
67	9110.8-AF-067	1	Brown soft/elastic material		None detected	Binder, Filler	4	Cellulose
68	9110.8-AF-068	1	Brown soft/elastic material		None detected	Binder, Filler	3	Cellulose
69	9110.8-AF-069	1	Gray soft/elastic material		None detected	Binder, Filler	4	Cellulose
70	9110.8-AF-070	1	Gray soft/elastic material		None detected	Binder, Filler	3	Cellulose
71	9110.8-AF-071	1	Blak soft material		None detected	Filler, Binder	3	Cellulose

SEATTLE ASBESTOS TEST

Lynnwood Laboratory: 19701 Scriber Lake Road, Suite 103, Lynnwood, WA 98036, Tel: 425.673.9850, Fax: 425.673.9810, NVLAP Lab Code: 200768-0

ANALYTICAL LABORATORY REPORT

[PLM] EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples; [PLM] EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Attn.: Anthony Fullerton **Client:** Med-Tox, Northwest **Address:** PO Box 1446, Auburn, WA 98071-1446

Job#: 9110.8 **Batch#:** 202212968 **Date Received:** 8/25/2023

Samples Rec'd: 72 **Date Analyzed:** 8/28/2023 **Samples Analyzed:** 72

Project Loc.: 770 11th Ave Longview WA

Analyzed by: Steve (Fanyao) Zhang

SZhang

Approved Signatory: Steve (Fanyao) Zhang, President

Lab ID	Client Sample ID	Layer	Description	%	Asbestos Fibers	Non-fibrous Components	%	Non-asbestos Fibers
72	9110.8-AF-072	1	Blak soft material		None detected	Filler, Binder	2	Cellulose

Appendix F
Analytical Report- Lead

EMSL Analytical, Inc.
6340 CastlePlace Dr., Indianapolis, IN 46250
Phone/Fax: (317) 803-2997 / (317) 803-3047
http://www.EMSL.com indianapolislab@emsl.com

EMSL Order: 162319649
CustomerID: MEDT50
CustomerPO:
ProjectID:

Attn: **Anthony Fullerton**
Med-Tox Northwest
PO Box 1446
Auburn, WA 98071

Phone: (253) 351-0677
Fax: (253) 351-0688
Received: 8/28/2023 09:15 AM
Collected: 8/24/2023

Project: **9110.8**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client SampleDescription	*Collected*	*Analyzed*	*Weight*	*RDL*	*Lead Concentration*
9110.8-AF-01Pb *162319649-0001*	8/24/2023	8/30/2023 Site: EXTERIOR Desc: SOFFIT, GWB, WHITE	0.2531 g	0.0080 % wt	<0.0080 % wt
9110.8-AF-02Pb *162319649-0002*	8/24/2023	8/30/2023 Site: RETAIL AREA Desc: WALL, GWB, BLUE	0.173 g	0.012 % wt	<0.012 % wt
9110.8-AF-03Pb *162319649-0003*	8/24/2023	8/30/2023 Site: PLATE ROOM (STORAGE) Desc: WALL, GWB, GRAY	0.2579 g	0.0080 % wt	0.061 % wt
9110.8-AF-04Pb *162319649-0004*	8/24/2023	8/30/2023 Site: PLATE ROOM Desc: WALL, GWB, TAN	0.1428 g	0.014 % wt	0.18 % wt
9110.8-AF-05Pb *162319649-0005*	8/24/2023	8/30/2023 Site: PRESS ROOM Desc: WALL, GWB, WHITE	0.2505 g	0.0080 % wt	0.11 % wt
9110.8-AF-06Pb *162319649-0006*	8/24/2023	8/30/2023 Site: PRESS ROOM Desc: WALL, GWB, WHITE	0.2533 g	0.0080 % wt	0.018 % wt
9110.8-AF-07Pb *162319649-0007*	8/24/2023	8/30/2023 Site: RETAIL AREA Desc: WALL, GWB, BROWN	0.253 g	0.0080 % wt	<0.0080 % wt

Aleksandrea Kuchenbrod

Aleksandrea Kuchenbrod, Inorganic Chemistry Lab Manager
or other approved signatory

* Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.008% wt based on the minimum sample weight per our SOP. "<" (less than) result signifies the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. Definitions of modifications are available upon request.

Samples analyzed by EMSL Analytical, Inc. Indianapolis, IN AIHA LAP, LLC-ELLAP Accredited #157245, OH E10040

Initial report from 09/05/2023 09:29:57

OrderID: 162319649

Lead (Pb) Chain of Custody

EMSL Order ID *(Lab Use Only)*: 162319649

PHONE:
FAX:

Company: Med-Tox NW	**EMSL-Bill to:** ☐ Different ☐ Same If Bill to is Different note instructions in Comments** *Third Party Billing requires written authorization from third party*
Street: P.O.BOX 1446	
City: Auburn **State/Province:** WA	**Zip/Postal Code:** 98071 **Country:** USA
Report To (Name): Anthony Fullerton	**Telephone #:** 253.351.0677
Email Address: fullertona@medtoxnw.com	**Fax #:** **Purchase Order:**
Project Name/Number: 9110.8	**Please Provide Results:** ☐ FAX ☐ E-mail ☐ Mail
U.S. State Samples Taken: WA	**CT Samples:** ☐ Commercial/Taxable ☐ 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

**Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide*

Matrix	Method	Instrument	Reporting Limit	Check
Chips ☒ % by wt. ☐ mg/cm² ☐ ppm	SW846-7000B	Flame Atomic Absorption	0.01%	☒
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	☐
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	☐
	NIOSH 7300 modified	ICP-AES/ICP-MS	0.5 µg/filter	☐
Wipe* ASTM ☐ non ASTM ☐ *if no box is checked, non-ASTM Wipe is assumed	SW846-7000B	Flame Atomic Absorption	10 µg/wipe	☐
	SW846-6010B or C	ICP-AES	1.0 µg/wipe	☐
	SW846-7000B/7010	Graphite Furnace AA	0.075 µg/wipe	☐
TCLP	SW846-1311/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	SW846-1131/SW846-6010B or C	ICP-AES	0.1 mg/L (ppm)	☐
Soil	SW846-7000B	Flame Atomic Absorption	40 mg/kg (ppm)	☐
	SW846-7010	Graphite Furnace AA	0.3 mg/kg (ppm)	☐
	SW846-6010B or C	ICP-AES	2 mg/kg (ppm)	☐
Wastewater Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	SM3111B/SW846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	☐
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.7	ICP-AES	0.020 mg/L (ppm)	☐
Drinking Water Unpreserved ☐ Preserved with HNO_3 pH < 2 ☐	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	☐
	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	☐
TSP/SPM Filter	40 CFR Part 50	ICP-AES	12 µg/filter	☐
	40 CFR Part 50	Graphite Furnace AA	3.6 µg/filter	☐
Other:				☐

Name of Sampler: A Fullerton **Signature of Sampler:**

Sample #	Location	Volume/Area	Date/Time Sampled
9110.8-	AF-01 Pb		8/24/23
	02 Pb		
	03 Pb		
	04 Pb	See Table	
	05 Pb		
	06 Pb		
9110.8-	AF-07 Pb		8/24/23

Client Sample #'s 01 - 07 **Total # of Samples:** 7

Relinquished (Client): **Date:** 8/25/23 **Time:** 1015

Received (Lab): DB Nelson **Date:** 8-28-23 **Time:** 9:15 AM

Comments: EAP

196449

Table 3. Summary of Bulk Paint Chip Sample Results

Sample Number	Location	Component	Substrate	Color	Result (% by wt.)
770 11th Ave, Longview, WA					
9110.8-AF-01Pb	Exterior	Soffit	GWB	White	
9110.8-AF-02Pb	Retail area	Wall	GWB	Blue	
9110.8-AF-03Pb	Plate room (storage)	Wall	GWB	Gray	
9110.8-AF-04Pb	Plate room	Wall	GWB	Tan	
9110.8-AF-05Pb	Press room	Wall	GWB	White	
9110.8-AF-06Pb	Press room	Wall	CMU	White	
9110.8-AF-07Pb	Retail area	Wall	GWB	Brown	

Bolded values – bulk paint chip samples with lead detected above the laboratory reporting limit have been bolded. The Washington Industrial Safety and Health Administration (WISHA) worker protection regulations have stated that lead at any detectable concentration shall be considered regulated (Washington Administrative Code [WAC] 296-155-176, Lead.

Appendix G
EMSL Analytical, Inc. Laboratory Certification

AIHA Laboratory Accreditation Programs, LLC

acknowledges that

EMSL Analytical, Inc.

6340 Castleplace Drive Indianapolis, IN 46250

Laboratory ID: LAP-157245

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA LAP), LLC accreditation to the ISO/IEC 17025:2017 international standard, General Requirements for the Competence of Testing and Calibration Laboratories in the following:

LABORATORY ACCREDITATION PROGRAMS

☑	**INDUSTRIAL HYGIENE**	Accreditation Expires: June 01, 2025
☑	**ENVIRONMENTAL LEAD**	Accreditation Expires: June 01, 2025
☑	**ENVIRONMENTAL MICROBIOLOGY**	Accreditation Expires: June 01, 2025
☐	**FOOD**	Accreditation Expires:
☐	**UNIQUE SCOPES**	Accreditation Expires:

Specific Field(s) of Testing (FoT)/Method(s) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached Scope of Accreditation. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2017 and AIHA LAP, LLC requirements. This certificate is not valid without the attached Scope of Accreditation. Please review the AIHA LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

Cheryl O. Morton

Cheryl O Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Revision21: 05/15/2023

Date Issued: 06/01/2023

AIHA Laboratory Accreditation Programs, LLC

SCOPE OF ACCREDITATION

EMSL Analytical, Inc.
6340 Castleplace Drive Indianapolis, IN 46250

Laboratory ID: LAP-157245
Issue Date: 06/01/2023

The laboratory is approved for those specific field(s) of testing/methods listed in the table below. Clients are urged to verify the laboratory's current accreditation status for the particular field(s) of testing/Methods, since these can change due to proficiency status, suspension and/or withdrawal of accreditation.

The EPA recognizes the AIHA LAP, LLC ELLAP program as meeting the requirements of the National Lead Laboratory Accreditation Program (NLLAP) established under Title X of the Residential Lead-Based Paint Hazard Reduction Act of 1992 and includes paint, soil and dust wipe analysis. Air and composited wipes analyses are not included as part of the NLLAP.

Environmental Lead Laboratory Accreditation Program (ELLAP)

Initial Accreditation Date: 09/01/2002

Component, parameter or characteristic tested	Technology sub-type/Detector	Method	Method Description *(for internal methods only)*
Airborne Dust	AA	NIOSH 7082	N/A
Paint	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A
Settled Dust by Wipe	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A
Soil	AA	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 7000B	N/A

Component, parameter or characteristic tested	Technology sub-type/Detector	Method	Method Description *(for internal methods only)*
	ICP	EPA SW-846 3050B	N/A
		EPA SW-846 3051A	N/A
		EPA SW-846 6010D	N/A

A complete listing of currently accredited ELLAP laboratories is available on the AIHA LAP, LLC website at:
http://www.aihaaccreditedlabs.org

Appendix H
Analytical Report- PCB's

OnSite Environmental Inc.
14648 NE 95th Street, Redmond, WA 98052 • (425) 883-3881

September 7, 2023

Anthony Fullerton
MED-TOX Northwest
P.O. Box 1146
Auburn, WA 98071

Re: Analytical Data for Project 9110.8
Laboratory Reference No. 2308-321

Dear Anthony:

Enclosed are the analytical results and associated quality control data for samples submitted on August 29, 2023.

The standard policy of OnSite Environmental, Inc. is to store your samples for 30 days from the date of receipt. If you require longer storage, please contact the laboratory.

We appreciate the opportunity to be of service to you on this project. If you have any questions concerning the data, or need additional information, please feel free to call me.

Sincerely,

David Baumeister
Project Manager

Enclosures

Date of Report: September 7, 2023
Samples Submitted: August 29, 2023
Laboratory Reference: 2308-321
Project: 9110.8

Case Narrative

Samples were collected on August 24, 2023 and received by the laboratory on August 29, 2023. They were maintained at the laboratory at a temperature of 2°C to 6°C.

Please note that any and all soil sample results are reported on a dry-weight basis, unless otherwise noted below.

General QA/QC issues associated with the analytical data enclosed in this laboratory report will be indicated with a reference to a comment or explanation on the Data Qualifier page. More complex and involved QA/QC issues will be discussed in detail below.

Date of Report: September 7, 2023
Samples Submitted: August 29, 2023
Laboratory Reference: 2308-321
Project: 9110.8

PCBs EPA 8082A

Matrix: Soil
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
Client ID:	**9110.8-Af-01PCB**					
Laboratory ID:	08-321-01					
Aroclor 1016	**0.68**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1221	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1232	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1242	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1248	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1254	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1260	**0.76**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1262	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Aroclor 1268	**ND**	0.54	EPA 8082A	8-31-23	8-31-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*55*	*50-127*				
Client ID:	**9110.8-Af-02PCB**					
Laboratory ID:	08-321-02					
Aroclor 1016	**0.63**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1221	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1232	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1242	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1248	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1254	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1260	**0.58**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1262	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Aroclor 1268	**ND**	0.50	EPA 8082A	8-31-23	8-31-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*66*	*50-127*				
Client ID:	**9110.8-Af-03PCB**					
Laboratory ID:	08-321-03					
Aroclor 1016	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1221	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1232	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1242	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1248	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1254	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1260	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1262	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Aroclor 1268	**ND**	0.53	EPA 8082A	8-31-23	8-31-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*76*	*50-127*				

Date of Report: September 7, 2023
Samples Submitted: August 29, 2023
Laboratory Reference: 2308-321
Project: 9110.8

PCBs EPA 8082A
QUALITY CONTROL

Matrix: Soil
Units: mg/Kg (ppm)

Analyte	Result	PQL	Method	Date Prepared	Date Analyzed	Flags
METHOD BLANK						
Laboratory ID:	MB0831S1					
Aroclor 1016	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1221	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1232	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1242	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1248	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1254	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1260	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1262	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Aroclor 1268	**ND**	0.050	EPA 8082A	8-31-23	8-31-23	
Surrogate:	*Percent Recovery*	*Control Limits*				
DCB	*91*	*50-127*				

Analyte	Result		Spike Level		Source Result	Percent Recovery		Recovery Limits	RPD	RPD Limit	Flags
SPIKE BLANKS											
Laboratory ID:	SB0831S1										
	SB	SBD	SB	SBD		SB	SBD				
Aroclor 1260	**0.328**	**0.367**	0.500	0.500	N/A	**66**	**73**	55-119	11	34	
Surrogate:											
DCB						*80*	*82*	*50-127*			

OnSite Environmental Inc.

Data Qualifiers and Abbreviations

A - Due to a high sample concentration, the amount spiked is insufficient for meaningful MS/MSD recovery data.

B - The analyte indicated was also found in the blank sample.

C - The duplicate RPD is outside control limits due to high result variability when analyte concentrations are within five times the quantitation limit.

E - The value reported exceeds the quantitation range and is an estimate.

F - Surrogate recovery data is not available due to the high concentration of coeluting target compounds.

H - The analyte indicated is a common laboratory solvent and may have been introduced during sample preparation, and be impacting the sample result.

I - Compound recovery is outside of the control limits.

J - The value reported was below the practical quantitation limit. The value is an estimate.

K - Sample duplicate RPD is outside control limits due to sample inhomogeneity. The sample was re-extracted and re-analyzed with similar results.

L - The RPD is outside of the control limits.

M - Hydrocarbons in the gasoline range are impacting the diesel range result.

M1 - Hydrocarbons in the gasoline range (toluene-naphthalene) are present in the sample.

N - Hydrocarbons in the lube oil range are impacting the diesel range result.

N1 - Hydrocarbons in diesel range are impacting lube oil range results.

O - Hydrocarbons indicative of heavier fuels are present in the sample and are impacting the gasoline result.

P - The RPD of the detected concentrations between the two columns is greater than 40.

Q - Surrogate recovery is outside of the control limits.

S - Surrogate recovery data is not available due to the necessary dilution of the sample.

T - The sample chromatogram is not similar to a typical _____.

U - The analyte was analyzed for, but was not detected above the reported sample quantitation limit.

U1 - The practical quantitation limit is elevated due to interferences present in the sample.

V - Matrix Spike/Matrix Spike Duplicate recoveries are outside control limits due to matrix effects.

W - Matrix Spike/Matrix Spike Duplicate RPD are outside control limits due to matrix effects.

X - Sample extract treated with a mercury cleanup procedure.

X1 - Sample extract treated with a sulfuric acid/silica gel cleanup procedure.

X2 - Sample extract treated with a silica gel cleanup procedure.

Y - The calibration verification for this analyte exceeded the 20% drift specified in methods 8260 & 8270, and therefore the reported result should be considered an estimate. The overall performance of the calibration verification standard met the acceptance criteria of the method.

Y1 - Negative effects of the matrix from this sample on the instrument caused values for this analyte in the bracketing continuing calibration verification standard (CCVs) to be outside of 20% acceptance criteria. Because of this, quantitation limits and sample concentrations should be considered estimates.

Z -

ND - Not Detected at PQL
PQL - Practical Quantitation Limit
RPD - Relative Percent Difference

Chain of Custody

OnSite Environmental Inc.
Analytical Laboratory Testing Services
14648 NE 95th Street • Redmond, WA 98052
Phone: (425) 883-3881 • www.onsite-env.com

Company: Med-Tox NW
Project Number: 9110.8
Project Name: 770 11th Ave, Longview WA
Project Manager: A Filuk
Sampled by: A Filuk

Turnaround Request (in working days)

(Check One)

- ☐ Same Day
- ☐ 1 Day
- ☐ 2 Days
- ☐ 3 Days
- ☒ Standard (7 Days) (TPH analysis 5 Days)
- ☐ _____ (other)

Laboratory Number: 08-321

Lab ID	Sample Identification	Date Sampled	Time Sampled	Matrix	Number of Containers	NWTPH-HCID	NWTPH-Gx/BTEX	NWTPH-Gx	NWTPH-Dx	Volatiles 8260C	Halogenated Volatiles 8260C	Semivolatiles 8270D/SIM (with low-level PAHs)	PAHs 8270D/SIM (low-level)	PCBs 8082A	Organochlorine Pesticides 8081B	Organophosphorus Pesticides 8270D/SIM	Chlorinated Acid Herbicides 8151A	Total RCRA Metals	Total MTCA Metals	TCLP Metals	HEM (oil and grease) 1664A
1	9110.8-AF-01 PCB	8/24/23		Solid	1									X							
2	9110.8-AF-02 PCB	"		"	1									X							
3	9110.8-AF-03 PCB	8/24/23		Solid	1									X							

	Signature	Company	Date	Time
Relinquished		MTNW	8/25/23	1100
Received	Michelle Biffin	OSE	8/29/23	1345
Relinquished				
Received				
Relinquished				
Received				

Comments/Special Instructions

Reviewed/Date

Reviewed/Date

Chromatograms with final report ☐

Data Package: Standard ☐ Level III ☐ Level IV ☐

Electronic Data Deliverables (EDDs) ☐ _____

Appendix I
On-Site Laboratory Accreditation

The State of Washington Department of Ecology

OnSite Environmental, Inc.

Redmond, WA

has complied with provisions set forth in Chapter 173-50 WAC and is hereby recognized by the Department of Ecology as an ACCREDITED LABORATORY for the analytical parameters listed on the accompanying Scope of Accreditation.

This certificate is effective July 27, 2023 and shall expire July 26, 2024.

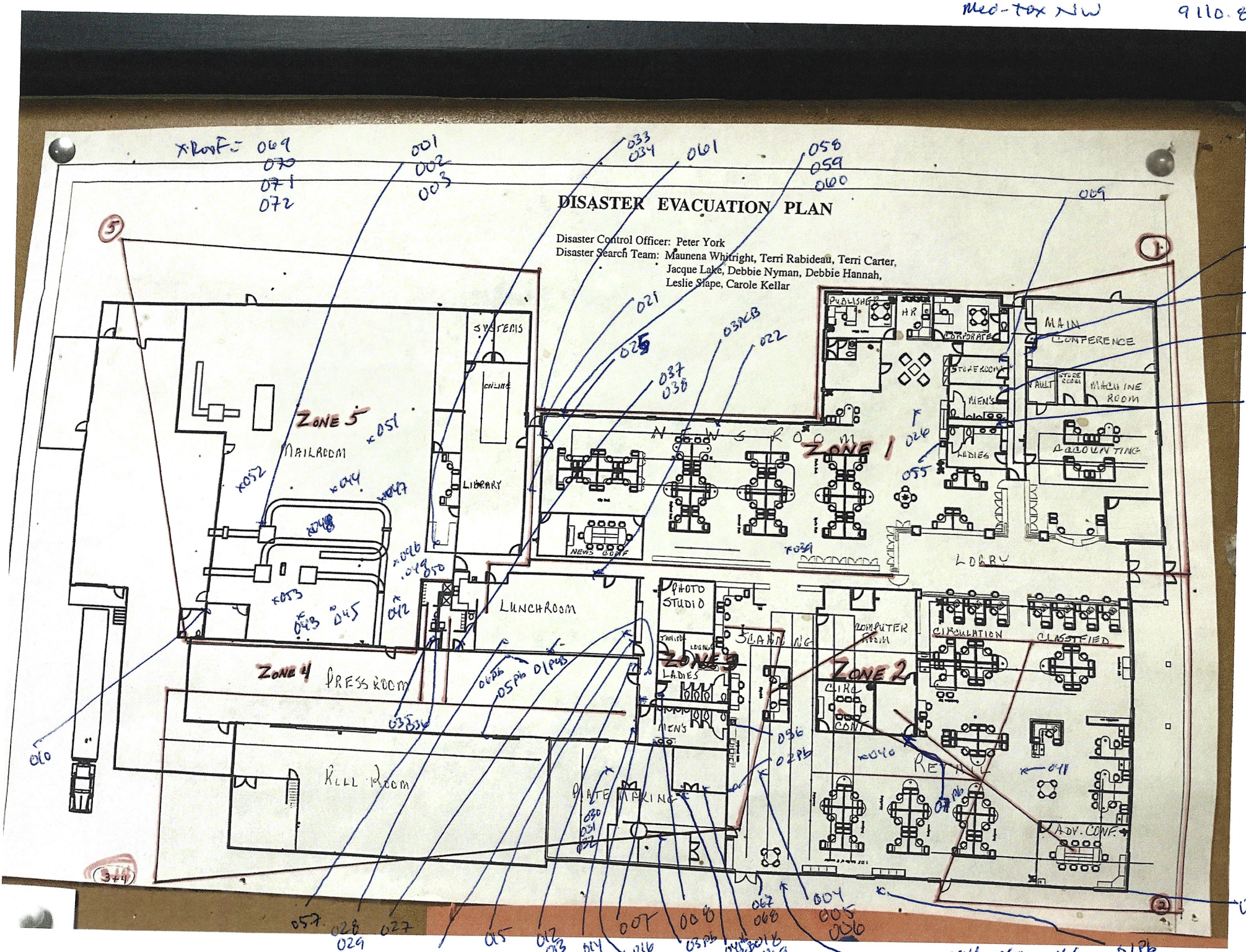
Witnessed under my hand on August 11, 2023.

Rebecca Wood
Lab Accreditation Unit Supervisor

Laboratory ID
C591

Appendix J
Sample Location Drawings

Sample Locations Sept 2023
Med-Tox NW 9110.8



Appendix K
Previous Survey Report

HARTCROWSER

Earth and Environmental Technologies

Hart Crowser, Inc.
1910 Fairview Avenue East
Seattle, Washington 98102-3699
Fax 206.328.5581
Tel 206.324.9530
www.hartcrowser.com

J-7088-02

February 9, 1999

Gary A. Bergquist
Davis Wright Tremaine LLP
2600 Century Square
1501 4th Avenue
Seattle, WA 98101-1688

Re: Asbestos Survey and Limited Lead-Based Paint Screening
Daily News Building and Boat House
770 11th Avenue
Longview, Washington

Dear Mr. Bergquist:

This letter report presents the results of our asbestos survey of the Daily News building and boat house, located in Longview, Washington. Areas surveyed included the Press room, Newsprint storage area (including the associated ink storage rooms, and second level storage room), the remainder of the Daily News building, and the boat house. Additionally, a limited lead-based paint (LBP) screening was conducted in the Daily News building. The work described in this letter report was completed in accordance with our Contract Change (001), dated January 11, 1999, and our second proposal (99-11-1131), dated January 22, 1999. We understand that you are representing a client that is interested in purchasing the Daily News and has requested an asbestos and limited lead survey for the property. Our survey provides information to assess the presence and condition of asbestos and lead-based paint in the subject buildings.

Our report begins with a **SUMMARY OF FINDINGS AND RECOMMENDATIONS** section which is followed by our:

- **BACKGROUND AND REGULATIONS**;
- **SURVEY METHODOLOGIES**;
- **RESULTS OF SAMPLE ANALYSIS**; and
- **LIMITATIONS**.

Figure 1 is a Suspect Asbestos and Lead-Based Paint Sampling Location Plan showing the locations of the suspect asbestos and LBP samples collected on the subject property. Table 1 presents the results of the asbestos survey. Table 2 presents the results from the limited LBP screening. Appendix A presents certificates of laboratory analyses of the suspect asbestos and LBP samples. Appendix B presents certificates of the building inspectors.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

Materials suspected to contain asbestos were sampled from various locations throughout the Daily News building. The pressroom and the newsprint storage room contain severely damaged asbestos in the sprayed-on fire-proofing surfacing materials. The dust above the metal drop ceiling, and the ceiling tile located throughout the building also contain asbestos. Asbestos is also present in the pipe elbows, cove mastic, and vinyl flooring backing and mastic (Table 1). Building materials which we were not able to sample because of their location or to avoid damage were assumed to contain asbestos. These materials include the tar roof of the facility, ceramic tile mastic located in the men's restrooms, and fire doors located throughout the building.

Suspect asbestos-containing materials (ACM) were not observed in the boat house. Building materials included metal siding and roofing on the exterior, and press-board paneling on the interior. Therefore, no samples were collected from this building.

Based on the bulk paint data collected, as shown on Figure 1 and in Table 2, only the walls of the plate-making storage room contained lead above the method detection limit. This paint appeared to be in good condition.

Recommendations

It appears the sprayed-on fire-proofing has been severely damaged by repeated contact with plant equipment. This damaged material is friable and poses a potential risk to the health of plant personnel. Hart Crowser recommends prompt removal and disposal of the degraded areas of asbestos-containing sprayed-on fire-proofing. We also recommend the remaining sprayed-on fire proofing be either encapsulated and enclosed, or completely removed. Removal would eliminate

future maintenance problems with the fire-proofing. The rolled vinyl flooring, although positive for asbestos, may be left in place as long as it is not disturbed. The pipe elbows appear to be in good condition, and can remain so long as no damage occurs to them.

The ceiling tiles containing asbestos appear to be in good condition with some water damage present. Sources of water damage should be investigated and repaired. The fibrous drop ceiling throughout the facility should be removed and disposed of as asbestos waste, along with stored replacement tiles. Leaving ACM ceiling tiles merely defers replacement to the future. Dust generation from routine maintenance and water damage may potentially increase long-term risks of employee exposure to asbestos. Partial replacement of ceiling tiles might lead to uncertainty about "old" versus "new", and consequently duplicate replacement costs.

Dust above the metal drop ceiling in the Press Room should be removed promptly. The metal panels can either be removed and entirely disposed of as asbestos waste, or they can be removed, cleaned, and replaced. The fibrous parts of the metal drop ceiling that run along the north and south sides of the press room should be removed and disposed of as asbestos waste. Air monitoring for asbestos should be conducted during and after abatement to verify that asbestos dust has been properly removed.

If asbestos and lead-based paint are to be left in place, an Asbestos and Lead Operations and Maintenance Plan (O&M Plan) should be established. An O&M Plan provides procedures for plant personnel and outside contractors to avoid damage to ACM and LBP in the building. This Plan also provides for training of maintenance personnel and others in the proper handling of ACM and LBP during maintenance, remodeling, or demolition activities.

A full survey of LBP in the building should be conducted prior to renovation. Materials containing lead above regulatory limits should be disposed of under local, state, and federal regulations.

BACKGROUND AND REGULATIONS

Asbestos-Containing Materials (ACM)

Asbestos as a Building Material

Asbestos is a class of magnesium-silicate minerals that naturally occur in fibrous form. The most common type of asbestos used in building materials is chrysotile. Crocidolite and amosite make up most of the remainder. Other forms, rarely encountered in building materials, include anthophyllite,

tremolite, and actinolite. The potential for an asbestos-containing material to release fibers depends largely on its degree of friability (the ability to be reduced to powder or dust by application of hand pressure).

Because of its high thermal resistance, tensile strength, stability, and non-combustible nature, asbestos was widely used for many years as insulating material on pipes, boilers, ventilation ducts, tanks, and as a fireproofing material on structural steel beams and roofing decks. Asbestos was also applied extensively to control acoustics inside buildings prior to the 1970s. Asbestos can also be found in materials such as floor and ceiling tile, linoleum, cement asbestos boards, gaskets, woven fireproof cloths and blankets, transite, wallboard, wallboard joint compounds, plasters (particularly textured wall and ceiling finishes), caulking, mortar (i.e., fireplaces, boiler rooms, and fire walls), roofing felts, shingles, and window putty.

Health Effects of Asbestos

Inhalation of asbestos fibers has been shown to cause disease in humans, including lung cancer, mesothelioma (cancer of the lung lining), and asbestosis (scarring of the lung tissue). The symptoms of these diseases may not appear for up to 20 years following exposure.

Asbestos Regulations

Products that contain more than 1 percent asbestos are regulated as ACM. Quantification of asbestos in materials is typically performed by polarized light microscopy (PLM). Point counting (PCT) is a more accurate determination of asbestos content made by counting fibers in specific fields of a prepared microscope slide. An extremely accurate method involves use of transmission electron microscopy (TEM), but this method is not typically used because the regulations do not specify its use for bulk asbestos analysis.

Hazardous air pollutants, including asbestos, are regulated by the US Environmental Protection Agency (EPA), under the Clean Air Act (CAA) (40 CFR Part 61, Subpart M). As authorized by the CAA, the National Emission Standards for Hazardous Air Pollutants (NESHAPs) regulation addresses emissions of asbestos from renovation and demolition activities. In essence, NESHAPs prohibits the emission of any asbestos-containing dust to the environment. Under NESHAPs, a survey to identify ACM is required before beginning demolition or renovation projects. Section 118 of the CAA states that the federal government is subject to all federal, state, interstate, and local requirements in the same manner and to the same extent as any non-governmental entity.

The Occupational Safety and Health Administration (OSHA) regulates worker exposure to asbestos in 29 CFR 1910.1001 and 29 CFR 1926.58. According to this standard, workers exposure to airborne asbestos fibers must be below an 8-hour time weighted average of 0.1 fiber/cc. The regulations also specify work practices and methods to minimize worker exposure to asbestos in general industry and construction.

Lead-Based Paint (LBP)

Lead

Lead is a metal element that is ubiquitous in the human environment as a result of industrialization and automotive transportation. It was commonly added to paints to enhance its durability. Lead poisoning is one of the most common and preventable pediatric health problems today. New data indicate significant adverse effects of lead exposure in children at blood lead levels previously believed to have been safe. Of greatest concern are changes in the brain that cause reductions in intelligence and attention span, reading and learning disabilities, hyperactivity, and behavior problems. Adult exposed to lead in residential or industrial environments may suffer a variety of health problems. Pregnant women and their fetuses are at special risk from lead.

Buildings that were built in the United States and painted prior to 1960 represent potential sources of Lead-Based Paint (LBP). Buildings constructed after 1960 are not necessarily free of LBP because the voluntary standard for limiting lead content in interior paint to less than 1 percent was only adopted in 1966; and, until very recently, exterior paint contained significant amounts of lead. Although current (1977) federal regulations have limited the lead content of most paints to 0.06 percent, it is still important to consider most older painted surfaces (e.g., walls, windows, trim, floors, eaves, banisters, etc.) as potential sources of lead.

Lead Regulations

The Resource, Conservation and Recovery Act (RCRA), established by the EPA, regulates lead-contaminated materials which could be released into the environment. Waste exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure (TCLP), lead concentration exceeds 5 mg/L (40 Code of Federal Regulation 261.24). Washington State Department of Ecology (Ecology) similarly regulates lead under its Dangerous Waste Regulations (WAC 173-303-090).

Federal regulations or guidelines regarding lead in building materials include:

- Title X of Public Law 102-550, Residential Lead-Based Paint Hazard Reduction Act of 1992. The purpose of Title X is to develop a national strategy to eliminate lead-based paint hazards in housing as expeditiously as possible. This regulation is not applicable to commercial structures. The requirements for implementing Title X are presented in EPA regulation 40 CFR Part 745. This regulation defines Lead-Based Paint as "paint or other surface coatings that contain lead equal to or in excess of 1.0 milligram per square centimeter or 0.5 percent by weight"; and

- In the event that building demolition debris contains concentrations of leachable lead above 5 mg/L, the state requires disposal of in a facility permitted to accept such wastes in accordance with WAC 173-303-070.

SURVEY METHODOLOGIES

Asbestos Survey

Hart Crowser conducted an initial limited asbestos survey at the Daily News building on January 13, 1999, and completed an additional asbestos survey on January 27, 1999. A complete list of suspect materials and samples collected by Hart Crowser is provided in Table 1. Existing floor plans were field-modified, as necessary, to reflect actual building characteristics and suspect asbestos sample locations (Figure 1).

Suspect Asbestos Sampling Procedures

Hart Crowser used the sampling and analytical procedures contained in Asbestos Hazard Emergency Reduction Act (AHERA) regulations (40 CFR 763.86). Samples of suspect materials were collected in the field by AHERA-Certified Building Inspectors Joe Grojean, (Certification Number 980935), and Carl Wolfe (Certification Number 981112). Certificates for these inspectors are in Appendix B.

Prior to sampling, Hart Crowser systematically inspected all visible areas of the subject buildings to identify the location of suspect ACM. Sampling locations were plotted on floor plans provided by the Daily News. Prior to and during sample collection, we maintained a wetted surface with amended water (i.e., water to which a surfactant was added to decrease the surface tension) to reduce the potential for fiber release. Where necessary, we repaired sampling locations to minimize fiber release and maintain the visual integrity of the material.

Hart Crowser marked each sample location on the floor plans with a unique number corresponding to the sample number to identify the material from which the sample was collected. Sample bags were labeled at the time of sample collection with the following information:

- Sample ID number;
- Date of collection; and
- Inspector's initials.

The labeled samples were then placed in a larger Ziploc™-type bag and sealed for additional protection during handling and shipment. Samples were recorded on a Chain of Custody form for eventual delivery to the laboratory for analysis.

All sampling tools were thoroughly sprayed with amended water prior to collecting each new sample. Wipes or other towels used during decontamination were placed in a Ziploc™-type bag for later disposal.

Suspect Asbestos Sample Selection

In total, 60 bulk materials samples were collected for asbestos analysis. The number of samples collected was dependent on the material type and the amount of material present. The number of samples of surfacing material collected for this survey was based on "Asbestos in Buildings: Simplified Sampling Scheme for Friable Surfacing Materials" (EPA, 1985). Hart Crowser treated wallboard systems as surfacing material for this survey. The EPA sampling guidelines recommend collection of nine samples of homogenous surfacing materials that measure greater than 5,000 square feet. An estimated 12,000 square feet of sprayed-on fire-proofing material were identified during this survey and twenty samples of this material were collected for analysis: nine samples in the Press room, seven samples in the Newsprint room, and one sample in each of the four storage rooms.

Hart Crowser collected single samples of additional suspect materials, including dust from the top of the drop ceiling, debris from the floor, and the ceiling tile associated with the drop ceiling in the Press room.

Analytical Procedures

Suspect asbestos samples and their chain of custody forms were picked up from Hart Crowser by NVL Laboratory for analysis. Suspect ACM bulk samples were analyzed using polarized light microscopy (PLM) by the Interim Method for Determination of Asbestos in Bulk Insulation Samples

(EPA Method 600/M4-82-020). NVL is accredited for asbestos analysis by the National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP). Materials were considered to be positive for asbestos if they contained more than one percent asbestos, in accordance with the definition of ACM provided in 40 CFR 763.

Lead-Based Paint Sampling

Hart Crowser collected seven bulk paint samples of the Daily News building on January 27, 1999. No samples were collected from the boat house. Sample materials were selected from painted surfaces. A complete list of samples taken for paint analysis is provided in Table 2. Existing floor plans were field-modified, as necessary, to reflect sample locations (Figure 1).

During this survey, samples were collected from painted surfaces using a chisel and hammer. Efforts were made to obtain the paint chip from an inconspicuous location. Sample areas were subsequently repaired to minimize physical damage to the component. Dust generated during sampling was carefully cleaned after the repair process.

LBP bulk paint samples and chain of custody were picked up by NVL Laboratories, Inc. (NVL) for analysis. Paint samples were analyzed by NVL according to the methods for total lead analysis using EPA SW-846 Method 7420 (Flame Atomic Absorption Spectroscopy [FAAS]). Lead concentrations are presented in milligrams of lead per kilogram.

RESULTS OF SAMPLE ANALYSIS

The results of the asbestos and lead-based paint surveys are summarized in this section. Laboratory certificates of analysis and chain of custody forms are included in Appendix A.

ACM Analytical Results

Table 1 summarizes analytical results for the 60 suspect asbestos bulk samples collected by Hart Crowser. Thirty-three samples tested positive for asbestos. Building material types containing asbestos include sprayed-on fire-proofing, ceiling tile, rolled vinyl flooring and mastic, cove mastic, and mudded pipe elbow insulation. Some materials were assumed to contain asbestos. The following table lists the ACM present in the Daily News building, along with the estimated quantity of each.

Asbestos-Containing Material	Quantity (estimated)
Sprayed-on fire-proofing (Press room, Newsprint Storage and related rooms)	32,500 square feet
Rolled vinyl flooring and mastic	6,230 square feet
Cove mastic, brown	120 linear feet
Ceiling tile	29,120 square feet
Mudded pipe elbows	Unable to determine quantity
Dust on metal drop ceiling in Press Room	4,500 square feet
Roof, tarred (Assumed ACM)	40,000 square feet
Ceramic tile mastic (Men's rooms) (Assumed ACM)	488 square feet
Fire Doors (Assumed ACM)	5 each

Quantities are estimated from blue prints, measurements, and extrapolated calculations from both.

- Sprayed-on fire-proofing samples tested positive for asbestos in the Press room (SM-002, SM-003, SM-005 through SM-011), the Newsprint room, and the associated storage rooms within the Newsprint room (SM-012 through SM-022). Fallen debris from the sprayed-on fire-proofing was sampled (SM-023) near the same location as the initial debris sample from the Phase I (Preliminary Environmental Assessment, Daily News, January 7, 1999), and also tested positive for asbestos. Asbestos content ranged from 25 to 48 percent.

- Yellow, pebbled rolled vinyl flooring and mastic (LN-1) contain regulated quantities of chrysotile asbestos (Samples DN-20 through DN-22). This material covers approximately 5,650 square feet of the building space.

- A second rolled vinyl flooring material (LN-4), which appeared to be newer than LN-1, tested positive for chrysotile (45 percent). This material was located in the Janitor Closet-3, Hall-3, and the Lunchroom.

- An estimated 120 linear feet of brown cove base mastic (DN-12) from Hall-2 contained 3 percent chrysotile.

- The main type of drop ceiling tile (2- by 4-foot) contains up to 12 percent asbestos. An estimated 29,120 square feet of this material were identified in this building (Samples SM-006, and DN-04 through DN-06).

- Water pipe insulation tested negative; however, the mudded pipe elbows tested positive for asbestos (PW-001 and DN-28). Quantities could not be estimated since the pipes were inaccessible, running between walls and above ceilings.

- A dust sample (SM-004) collected from the top surface of the metal drop ceiling located in the press room contained 15 percent amosite. Other dust samples collected elsewhere in the building were non-detect for asbestos.

- The roof of the building was re-tarred in November 1998. No samples of roofing materials were taken because of the potential to void roof warranties.

- The mastic beneath the ceramic tiles on the floors of the men's restrooms are assumed to contain asbestos. Sampling this material would have damaged the floor, potentially exposing the sub-floor to water damage.

- Five interior and exterior fire doors noted during the survey were assumed to contain asbestos.

LBP Analytical Results

Table 2 summarizes bulk paint sample analytical results. Seven bulk paint chip samples were collected from several walls throughout the Daily News main building. One of the samples tested positive for lead.

LIMITATIONS

Work for this project was performed, and this report prepared, in accordance with generally accepted professional practices for the nature and conditions of the work completed in the same or similar localities, at the time the work was performed. It is intended for the exclusive use of the intended purchaser of the Daily News, for specific application to the referenced buildings. No other warranty, express or implied, is made.

It should be noted that Hart Crowser relied on information provided by the individuals indicated above. Hart Crowser can only relay this information and cannot be responsible for its accuracy nor completeness.

If you have any questions about the report, please contact the undersigned.

Sincerely,

HART CROWSER, INC.

D. JOSEPH GROJEAN, CHMM
Compliance Specialist

DAVID CHAWES, CIH
Principal Industrial Hygienist

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Attachments:
Table 1 - Results of Asbestos Survey
Table 2 - Analytical Results for Paint Chip Samples
Figure 1 - Suspect Asbestos and Lead-Based Paint Sampling Location Plan
Appendix A - Certificates of Asbestos and Lead Analyses
NVL Laboratories, Inc.
Appendix B - Certificates of Building Inspectors

Table 1 - Results of Asbestos Survey
Daily News
Longview, Washington

Material ID	Material Description (Color)	Material Extent	Material Quantity	Sample ID	Sample Location	Asbestos Content and Type	Material Condition
SM-01	Sprayed-on Fire Proofing Surfacing Material - (light gray)	Press room, Newsprint room, Ink Storage rooms, Storage room	32,500 ft^2	SM-001	Newsprint Storage	25% Amosite	Good
				SM-002	Press Room	35% Amosite	Good
				SM-003	Press Room	33% Amosite	Good
				SM-005	Press Room	48% Amosite	Good
				SM-007	Press Room	48% Amosite	Good
				SM-008	Press Room	33% Amosite	Good
				SM-009	Press Room	40% Amosite	Good
				SM-010	Press Room	43% Amosite	Good
				SM-011	Press Room	43% Amosite	Good
				SM-012	Newsprint Storage	42% Amosite	Good
				SM-013	Newsprint Storage	40% Amosite	Good
				SM-014	Newsprint Storage	41% Amosite	Fair
				SM-015	Newsprint Storage	46% Amosite	Fair
				SM-016	Newsprint Storage	44% Amosite	Good
				SM-017	Newsprint Storage	44% Amosite	Degrading
				SM-018	Newsprint Storage	43% Amosite	Degrading
				SM-019	Newsprint Storage	43% Amosite	Degrading
				SM-020	Newsprint Storage	42% Amosite	Good
				SM-021	Newsprint Storage	41% Amosite	Degrading
				SM-022	Newsprint Storage	43% Amosite	Degrading
				SM-023	Newsprint Storage	44% Amosite	Degrading
MA-1	Carpet Mastic - Yellow	Throughout Building	24,900 ft^2	DN-01	Ad Department	ND	Good
				DN-02	Computer Storage Room	ND	Good
				DN-03	Managing Editor Office	ND	Good

Table 1 - Results of Asbestos Survey
Daily News
Longview, Washington

Material ID	Material Description (Color)	Material Extent	Material Quantity	Sample ID	Sample Location	Asbestos Content and Type	Material Condition
CT-1(1)	**Ceiling Tile**	**Throughout Building**	**29,120 ft²**	**SM-006**	**Press Room**	**12% Amosite**	**Good**
				DN-04	**Plate Making**	**8% Amosite**	**Good**
				DN-05	**Typesetter Room**	**8% Amosite**	**Good**
				DN-06	**Library**	**9% Amosite**	**Good**
CT-2	Ceiling Tile	Lobby	800 ft²	DN-07	Lobby	ND	Good
CT-3	Ceiling Tile	Lobby	150 ft²	DN-08	Lobby	ND	Good
CM-1	Cove Mastic-(White)	Composing, Circulation, Ad Dept., Photo Development	660 ft	DN-09	Circulation	ND	Good
CM-2	Cove Mastic-(Yellow)	Throughout Building	2,175 ft	DN-10	Press Room	ND	Good
				DN-11	Conference Room	ND	Good
CM-3	**Cove Mastic-(Brown)**	**Hall-2**	**120 ft**	**DN-12**	**Hall-2**	**3% Chrysotile**	**Good**
WB-1	Wall Board	Throughout Building	51,050 ft²	DN-13	Dark Room	ND	Good
				DN-14	Display Mgr. room	ND	Good
				DN-15	Accounting	ND	Good
				DN-16	Hall-2	ND	Good
				DN-17	News Room	ND	Good
				DN-18	Circulation	ND	Good
				DN-19	Mail Room	ND	Good
LN-1	**Rolled Vinyl-(brown with yellow), pebbled (Backing and Mastic-Layer 2)**	**Dark rooms, Plate Making, Office-1, Press room Kitchen, Under LN-2 and LN-3, Vault, Storage.**	**5,650 ft²**	**DN-20**	**Dark Room**	**45% Chrysotile**	**Good**
				DN-21	**Press room**	**45% Chrysotile**	**Good**
				DN-22	**Storage room**	**45% Chrysotile**	**Good**
LN-2	Rolled Vinyl-(tan, white), sm. pebble	Photo Develpment Room	360 ft²	DN-23	Photo Development	ND	Good
LN-3	Rolled Vinyl-(silver,white), lined squares	Handicap Restroom	60 ft²	DN-24	HC Restroom	ND	Good
LN-4	**Rolled Vinyl-(brown with light yellow), pebbled**	**Janitor-3, Hall-3, Lunch room**	**580 ft²**	**DN-25**	**Lunch room**	**45% Chrysotile**	**Good**
LN-5	Rolled Vinyl-(tan, white), block	Women's Restroom-2	220 ft²	DN-26	Women's-2	ND	Good
LN-6	Rolled Vinyl-(tan,white), square	Mail Room Office	130 ft²	DN-27	Mail Room	ND	Good

Table 1 - Results of Asbestos Survey
Daily News
Longview, Washington

Material ID	Material Description (Color)	Material Extent	Material Quantity	Sample ID	Sample Location	Asbestos Content and Type	Material Condition
PF-1	Pipe Insulation	Throughout Building	unknown	PW-001	Janitor-1	ND	Good
PF-2	**Mudded Elbows**	**Throughout Building**	**unknown**	**PW-001**	**Janitor-1**	**8% Chrysotile, 4% Amosite**	**Good**
PF-2	**Mudded Elbows**	**Throughout Building**	**unknown**	**DN-28**	**Janitor-2**	**16% Chrysotile, 5% Amosite**	**Good**
MI-1	**Dust**	**Press Room, above Drop Ceiling**	**unknown**	**SM-004**	**Press Room - from top of metal drop ceiling**	**15% Amosite**	**Good**
MI-2	Dust	Throughtout remainder of building above Drop Ceiling		DN-29	Press Room, off ventilation duct	ND	Good
				DN-30	Mail Room	ND	Good
				DN-31	Mail Room	ND	Good
				DN-32	Mail Room	ND	Good
				DN-33	Mail Room	ND	Good
				DN-34	News room	ND	Good
				DN-35	Lunch room	ND	Good
				DN-36	Composing	ND	Good
AS-1	**Tarred Roof**	**Roof of Daily News Bldg.**	**40,000 ft^2**	**NS**	**NA**	**Assumed**	**Good**
AS-2	**Ceramic Tile Mastic**	**Men's Restrooms**	**488 ft^2**	**NS**	**NA**	**Assumed**	**Good**
AS-3	**Fire Doors**	**Interior and Exterior**	**5 ea**	**NS**	**NA**	**Assumed**	**Good**

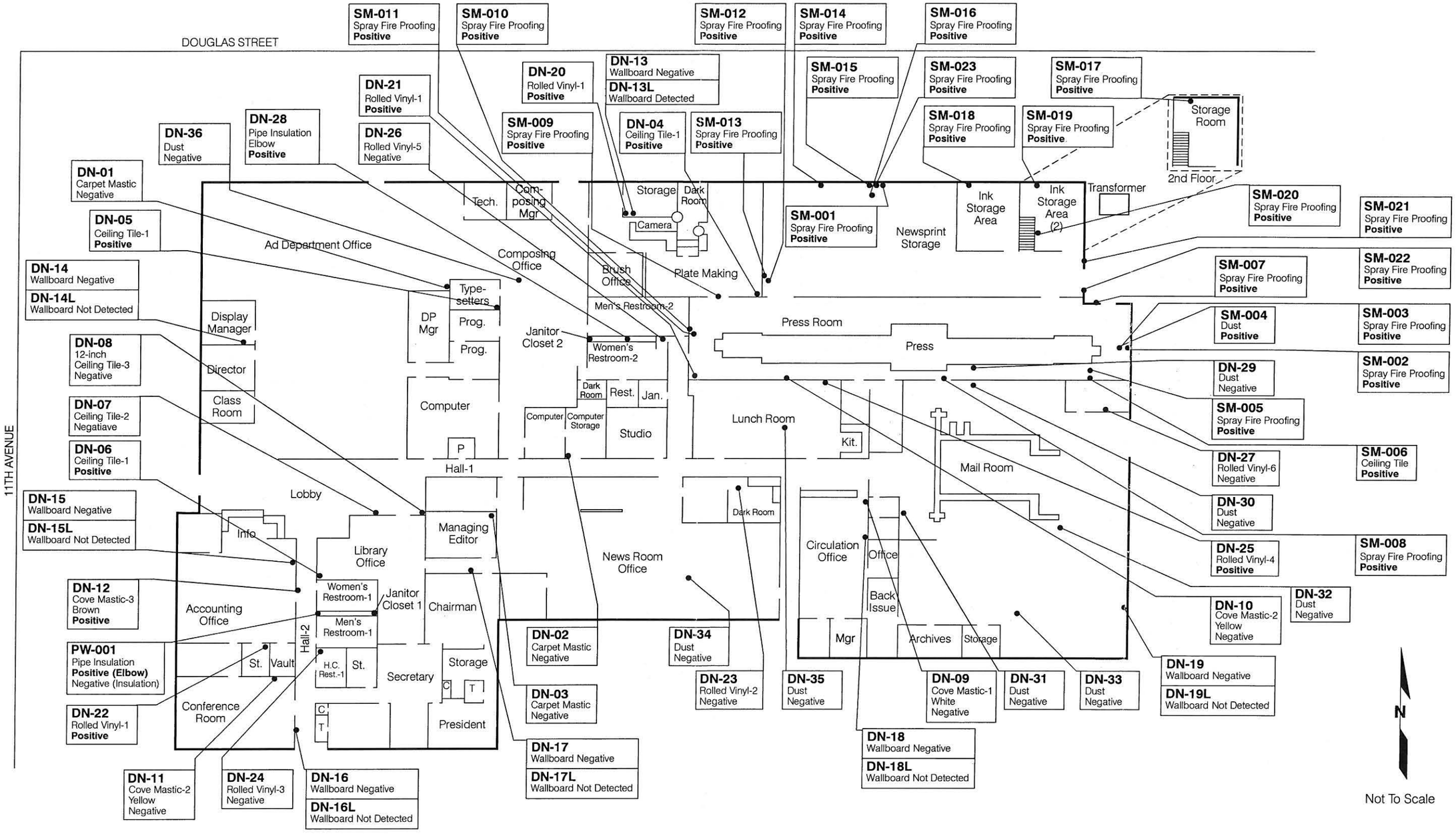
AS Assumed asbestos-containing material
ND Sample contained less than one percent asbestos.
NS Not Sampled
NA Not Applicable
Samples in bold face are positive for asbestos (contain more than 1 percent asbestos) or assumed asbestos.
(1) Water damaged ceiling tiles should be replaced immediately.

Table 2 - Analytical Results for Paint Chip Samples
Daily News
Longview, Washington

Sample ID	Total Lead in mg/kg
DN-13	1400
DN-14	140 U
DN-15	100 U
DN-16	120 U
DN-17	150 U
DN-18	100 U
DN-19	140 U

U Analyte not detected at analytical detection limit indicated.

Suspect Asbestos and Lead-Based Paint Sampling Location Plan



Note: For Asbestos Data, See Table 1

For Lead-Based Paint Data, See Table 2

- **DN-11** Suspect Asbestos Sample Location and Number
- **DN-18L** Suspect Lead-Based Paint Sample Location and Number

Positive = Asbestos > 1%

Negative = Asbestos ≤ 1%

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Figure 1

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APPENDIX A
CERTIFICATES OF ASBESTOS AND LEAD ANALYSES
NVL LABORATORIES, INC.

APPENDIX B
CERTIFICATES OF BUILDING INSPECTORS