

BGES, INC.

ENVIRONMENTAL CONSULTANTS

3606 RHONE CIRCLE
ANCHORAGE, ALASKA

LIMITED HAZARDOUS BUILDING MATERIALS INVENTORY

SEPTEMBER 2023

Submitted to: **Bill Paulsberg**
Director of Facilities
Southcentral Foundation
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Anchorage, Alaska 99508

Submitted by: **BGES, INC.**
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1.0 INTRODUCTION

BGES, Inc. (BGES) was retained by Bill Paulsberg, Director of Facilities for Southcentral Foundation, to conduct a Limited Hazardous Building Materials Inventory (HBMI) of the building located at 3606 Rhone Circle in Anchorage, Alaska (hereafter referred to as the “subject property”). The purpose of this assessment was to evaluate the potential presence of hazardous building materials, such as lead-based paint (LBP) and asbestos-containing building materials (ACBM), on the roof of the building.

This report presents the results of our findings. The presence of LBP was evaluated using an x-ray fluorescence (XRF) field-screening instrument, and asbestos was evaluated by collecting samples of potential ACBM (PACBM) and submitting this material to an accredited laboratory for analysis. XRF data and asbestos laboratory results are included in Appendix B.

The limited HBMI was performed on August 21, 2023. The inspections were performed by Carson Kent, Environmental Scientist II of BGES; and Sam Bundy, Environmental Scientist I of BGES. Mr. Kent is an Asbestos Hazard Emergency Response Act (AHERA)-Certified Building Inspector (Certificate #TBI4-123-17499) and U.S. Environmental Protection Agency (EPA)-Certified Lead Risk Assessor (Certificate #LBP-R-I219617-1), and Mr. Bundy is an AHERA-Certified Building Inspector (Certificate # TBI24-822-17040). Copies of BGES’ certificates are included in Appendix B.

A total of 5 XRF readings were taken from all identified different testing combinations in the inspected areas of the building on the subject property. Testing combinations are comprised of rooms (or room equivalents), building components, and substrates. None of the readings exceeded the EPA regulatory limit of 1.0 milligram (mg) of lead per square centimeter (cm²); or 1.0 mg/cm².

A total of 6 bulk samples (5 samples with 1 additional layer) were collected from PACBM identified in the inspected areas on the roof of the building at the subject property (Figure 1). The samples were sent to an accredited laboratory and were analyzed using Polarized Light Microscopy (PLM), in accordance with EPA Method 600/R-93/116. According to the National Emissions Standard for Hazardous Air Pollutants (NESHAP), Asbestos-Containing Materials (ACMs) are defined as containing at least 1 percent asbestos; including but not limited to chrysotile, amosite, tremolite, actinolite, and crocidolite asbestos. Samples were collected from roofing materials. Four of the samples were found to contain 2 percent chrysotile asbestos and are therefore considered to be “asbestos-containing” according to the NESHAP definition.

Applicable regulations regarding the abatement and disposal of ACM and LBP are described in greater detail in Section 5. Photographs of positive ACM sample locations are included in Appendix A and XRF data and laboratory analytical data pertaining to the PACBM samples are included in Appendix B.

2.0 SITE DESCRIPTION AND SAMPLING TECHNIQUES

According to the Municipality of Anchorage (MOA) Property Information database, the subject property contains a 4,824-square foot office building that was constructed in 1972. Lead sampling was performed by utilizing a Heuresis Pb200i XRF Lead Analyzer to test for the presence of lead in selected painted surfaces. This was accomplished in general accordance with established Department of Housing and Urban Development (HUD) & EPA guidelines.

Sampling of building materials for asbestos content analysis was conducted by removing a small sample of the suspected material, including all associated substrates, with a hammer and chisel or with single-use asbestos bulk-core sample cutters. The samples were then placed into sealable plastic bags and sealed for shipment to the laboratory. Samples for laboratory analysis were clearly labeled and submitted to the laboratory under chain of custody protocol.

3.0 ACBM AND LBP SAMPLING AND ASSESSMENT

3.1 Description of Assessment

The LBP and PACBM assessments were conducted on August 21, 2023. The assessment included a visual inspection of the building and collection of XRF data and PACBM samples. Samples were collected from roofing materials.

3.2 PLM and XRF Analytical Techniques

Painted surfaces were analyzed using a Heuresis Pb200i XRF Lead Analyzer. For a complete description of the XRF testing method, please refer to the 1997 HUD Inspection Protocol.

PACBM representative bulk samples collected during our inspection activities were analyzed for asbestos content by EMSL Analytical, Inc., a laboratory accredited by the National Institute of Standards and Technology (NIST) and approved by the National Voluntary Laboratory Accreditation Program (NVLAP). For a complete description of the PLM method, please refer to EPA Method 600/R-93/116 and Title 40 Code of Federal Regulations (CFR) Part 763 Appendix A to Subpart E, Section 1.

4.0 RESULTS

The results of the XRF analyses of painted surfaces and PLM analyses of PACBMs are listed below.

4.1 XRF Analysis Results

A total of 5 XRF readings were taken from selected painted surfaces, divided into various testing combinations. None of the readings exceeded the EPA regulatory limit of 1.0 mg/cm² for lead.

Applicable regulations regarding the abatement and disposal of LBP are described in greater detail in Section 5 below. XRF analytical data are summarized in Appendix B.

4.2 PLM Analytical Results

A total of six bulk samples (5 samples with 1 additional layer) were collected from PACBM identified on the roof of the building on the subject property. Each sample was analyzed by EPA Method 600/R-93/116. As described above, according to the NESHAP, ACMs are defined as containing more than 1 percent asbestos. Four of the samples (roofing material) were found to contain 2 percent chrysotile asbestos and therefore considered to be “asbestos-containing” according to the NESHAP definition.

Applicable regulations regarding the abatement and disposal of ACMs are described in greater detail in Section 5 below. PACBM sample locations are depicted on Figure 1, photographs of positive ACM sample locations are included in Appendix A, and PLM analytical data are included in Appendix B.

5.0 APPLICABLE REGULATIONS AND GUIDELINES

5.1 Lead-Based Paint For Federally Owned Or Assisted Housing (Sections 1012 & 1013)

On September 15, 1999, HUD published final regulations to implement Sections 1012 & 1013 of Title X, which set forth specific policies on LBP hazard reduction in federally assisted and federally owned housing (24 CFR Part 35 — Requirement for Notification, Evaluation and Reduction of Lead-Based Paint Hazard in Housing Receiving Federal Assistance). This rule is a comprehensive amendment of previous federal housing LBP regulations and consolidates HUD LBP requirements into one part of the CFR. HUD guidelines are applicable for a dwelling that contains LBP at 1.0 mg/cm² or more. In most cases, HUD guidelines also require disclosure of the presence of LBP in building materials to any future tenants or owners of the property.

5.2 U.S. EPA’s Renovation, Repair, & Painting (RRP) Rule (40 CFR 745 Subpart E)

Between 2008 and 2013, the U.S. EPA promulgated the RRP guidelines pertaining to renovation, repair, and painting projects that disturb lead-based paint in homes, child care facilities and pre-schools built before 1978, and it requires contractors to have their firm certified by EPA (or an EPA-authorized state),

use certified renovators who are trained by EPA-approved training providers and follow lead-safe work practices.

5.3 US EPA NESHAP Regulations

According to the NESHAP standards, before general demolition or renovation activities within buildings containing asbestos can occur, identified friable and some categories of non-friable ACMs must be properly encapsulated or abated, as prescribed by NESHAP regulations. NESHAP categorizes ACM analyzed by the PLM method into two main types, friable and non-friable ACM. Friable ACM is a material that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Non-friable ACM is further delineated by two different Categories, Category I and Category II non-friable ACM. Category I non-friable ACM is defined as asbestos-containing packing, gaskets, resilient floor covering, and asphalt roofing product. Category II non-friable ACM is any material, excluding Category I non-friable ACM that when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure. NESHAP considers friable ACM, Category I non-friable ACM, and Category II non-friable ACM that is exposed to certain conditions (discussed below), to be Regulated Asbestos Containing Material (RACM). Notification to the U.S. EPA or the state is required before a building containing RACM is demolished or renovated. A material is considered RACM if it fits these criteria:

- Friable ACM.
- Category I non-friable ACM that has been or will be exposed to forces during demolition or removal that may disturb the material and cause it to become friable. This includes, but is not limited to, grinding, cutting, sanding, and abrading.
- Category II non-friable ACM that has been or will be exposed to forces during demolition or renovation that may disturb the material, causing it to become crumbled, pulverized, or reduced to a powdered form.

According to NESHAP regulations, RACM need not be removed before demolition or renovation if it meets the following criteria:

- It is Category I non-friable ACM that is in good condition.
- It is enclosed in concrete or other similarly hard material and is adequately wet when it is exposed during demolition or renovation.
- The RACM was discovered after demolition or renovation began and it cannot be safely removed.

- It is Category II non-friable ACM and there is a low probability that the material will become disturbed during demolition or renovation.

5.4 OSHA Regulations CFR 1910 And 1926

OSHA's permissible exposure limit (PEL) is 0.1 fiber per cubic centimeter (f/cc) of air as an 8-hour time-weighted average (TWA). The Excursion Limit is 1.0 f/cc averaged over a 30-minute period. With the exception of agricultural activities, OSHA's general industry standard regulates all activities related to asbestos that are not covered by the construction and shipyard employment standards. This standard requires employers to provide awareness training to employees who perform maintenance or housekeeping duties where ACM or presumed ACM is located. This includes a mandatory participation-training program for all employees who are exposed to airborne asbestos at or above the PEL and or Excursion Limit. The program should be instituted and carried out before the employee's initial exposure to the area and a refresher course must be offered annually.

Under OSHA's construction standard, OSHA classifies construction activity according to descending degree of risk, with Class I work presenting the greatest potential risk and class IV the lowest.

- Class I work involves the removal of Thermal System Insulation (TSI) and surfacing ACM or PACM.
- Class II work involves removal of any other ACM that is not TSI or surfacing ACM.
- Class III work includes repair and maintenance activities where employees are likely to disturb ACM.
- Class IV work is defined as maintenance and custodial activities during which employees contact ACM or PACM, including waste and debris cleanup.

Employers must institute a training program for all workers who install asbestos-containing products and all workers who perform Class I, II, III, or IV work. Medical surveillance is required for all workers who engage in class I, II, or III work for a combined total of 30 days or more per year. Medical surveillance is also required for those who are exposed above the PEL or the excursion limit of 1.0 f/cc. Employers and building owners must communicate the hazard to employees and the contractors when ACM or PACM is present in their facilities or if their employees will work with ACM.

OSHA requires a competent person to be designated by the employer. The competent person must have qualifications and the authority for ensuring worker health and safety. This includes identifying existing asbestos hazards in the workplace and selecting the appropriate control strategy to reduce asbestos exposure with the authority to take prompt corrective action. Class I and Class II construction work requires the USEPA's Model Accreditation Plan (40 CFR 763) training or its equivalent for the project

designer or supervisor. Class III and Class IV construction work requires completion of a 24-hour Operation and Maintenance (O&M) course developed by the U.S. EPA (40 CFR 763.93) or its equivalent. The duties of the competent person include regular inspections of the job site, equipment, and materials as part of the required safety and health program.

6.0 CONCLUSIONS AND RECOMMENDATIONS

A total of 5 XRF readings were taken from selected painted surfaces, divided into various testing combinations. None of the readings exceeded the EPA regulatory limit of 1.0 mg/cm² for lead.

A total of six bulk samples (5 samples with 1 additional layer) were collected from PACBM identified on the roof of the building on the subject property. Four of the samples were found to contain 2 percent chrysotile asbestos and are therefore considered to be “asbestos-containing” according to the NESHAP definition.

While an industry and regulatory-accepted method, use of the PLM method without a point count (for example the 400 or 1,000-point count) may result in estimated asbestos concentrations that are higher or lower than the material’s actual asbestos content. In other words, point counting provides a more precise quantification of a sample’s asbestos content than PLM analysis without a point count. Other analytical procedures (for example, cleanup of some samples via gravimetric reduction) may also improve the accuracy of the laboratory results. It should be noted that samples that are originally reported to contain 2 percent chrysotile asbestos when analyzed via the PLM method without point counting, are often found to contain less than 1 percent asbestos when reanalyzed with point counting.

The conclusions and recommendations presented in this report are based on prevailing site conditions during the sample collection period. The inspector did not demolish walls, chases, or any other building spaces while performing this assessment. Consequently, ACMs and LBP may be present in other areas/building materials that were not inspected during this survey. Furthermore, BGES’ scope of work was to conduct sampling on the roof of the building only, and this inspection did not constitute a complete building inspection.

This report was prepared for our client, Bill Paulsberg, Director of Facilities for Southcentral Foundation. The scope of work was defined in our written proposal dated August 23, 2023. It is not intended for third parties to rely on the information provided in this report, except at their own risk. This report presents facts, observations, and inferences based on conditions observed during the period of our project activities, and only those conditions that were evaluated as part of our scope of work. Changes to site conditions may have occurred since we completed our initial project activities. These changes may be from the actions of man or nature. Changes in regulations may also impact the interpretation of site conditions.

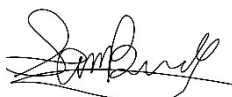
BGES will not disclose our findings to any parties other than our client as listed above, except as directed by our client, or as required by law.

The limited lead and asbestos inspections were conducted by Carson Kent, Environmental Scientist II of BGES; and Sam Bundy, Environmental Scientist I of BGES. Mr. Kent is an AHERA-Certified Building Inspector (Certificate #TBI24-220-13779) and an EPA-Certified Lead Risk Assessor (Certificate #LBP-R-I219617-1). Mr. Bundy is an AHERA-Certified Building Inspector (Certificate # TBI24-822-17040). This report was prepared by Mr. Bundy and reviewed by Rose Kayotuk, Senior Environmental Scientist of BGES. Ms. Kayotuk is an EPA-Certified Lead Inspector (Certificate #LBP-I-I146511-2) and AHERA-Certified Building Inspector (Certificate #ON-4644-8521-061322). Ms. Kayotuk has over 9 years of environmental consulting experience and has managed numerous HBMI's including lead and asbestos inspections at sites throughout Alaska.

Conducted by:



Carson Kent
Environmental Scientist II



Sam Bundy
Environmental Scientist I

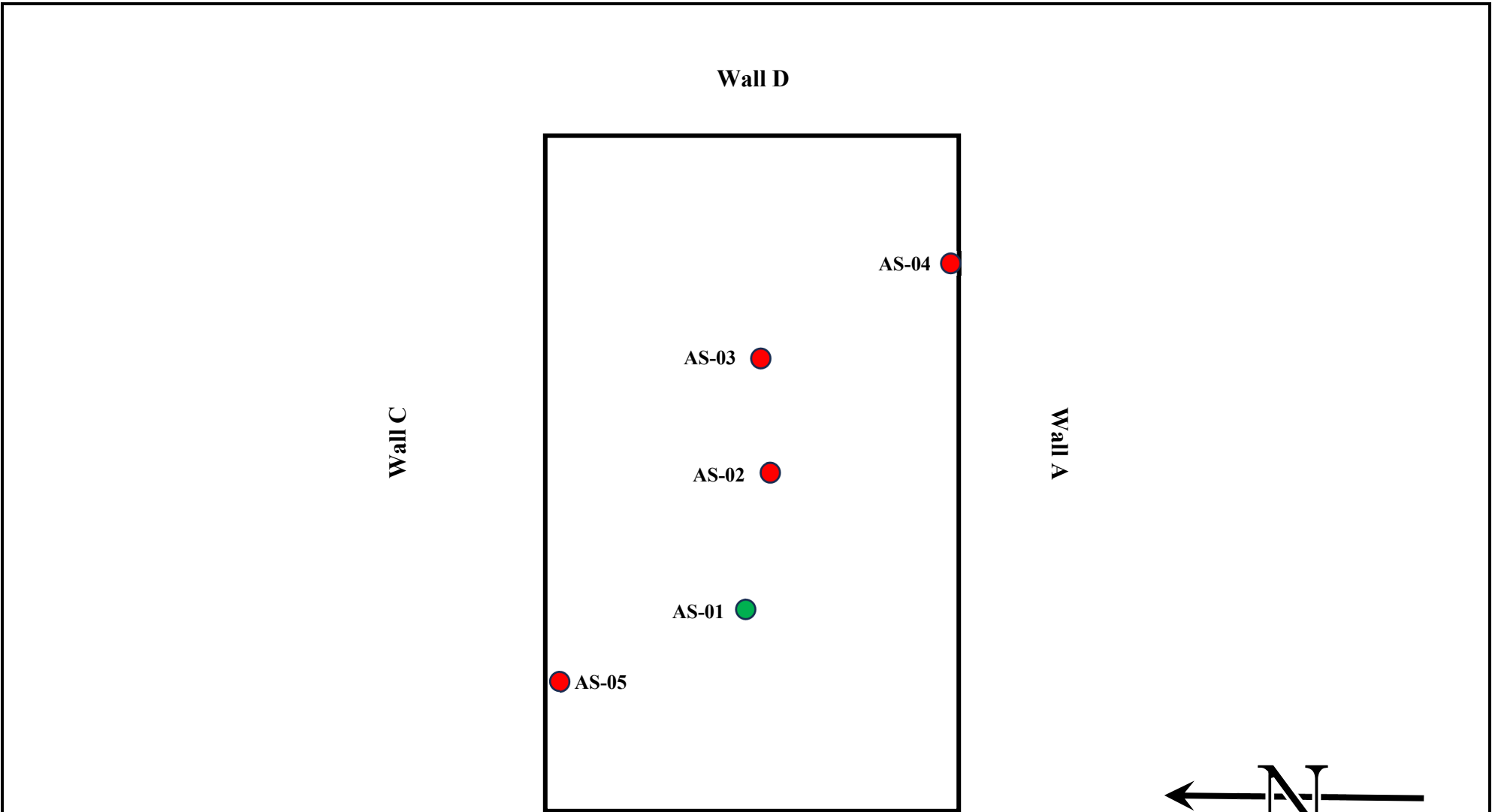
Reviewed by:



Rose Kayotuk
Sr. Environmental Scientist

**TABLE 1
ACM LOCATIONS AND RESULTS**

ACM ID #	Testing Location	Building Component	Result	Approximate Area (estimated total for unit/common area)
AS-02	Central Roof	Roofing Material	2% Chrysotile	4,243 Square Feet
AS-03	Central Roof	Roofing Material	2% Chrysotile	
AS-04	Southeast Roof	Roofing Material	2% Chrysotile	
AS-05	Northwest Roof	Roofing Material	2% Chrysotile	

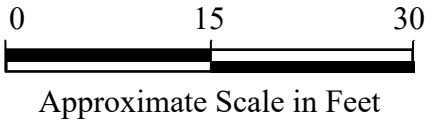


Source: Field sketch; scale is approximate

Key


- = Positive ACM Sample Location
- = Non-ACM Sample Location

ACM = Asbestos Containing Material



3606 Rhone Circle
Anchorage, Alaska

Positive ACM Sample Locations

	September 2023	Figure 1
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APPENDIX A
POSITIVE PACBM SAMPLE LOCATIONS PHOTOGRAPHS



Photo 1. Sample AS-02 – Central Roof; Roofing Materials.



Photo 2. Sample AS-03 – Central Roof; Roofing Materials.



Photo 3. Sample AS-04 – Southeast Roof; Roofing Materials.



Photo 4. Sample AS-05 – Northwest Roof; Roofing Materials.

3606 Rhone Circle
Anchorage, Alaska
**Positive ACM Sample Locations
Photographs**

APPENDIX B
XRF DATA & PLM ANALYTICAL DATA

XRF Readings

BGES, Inc.

No.	Job	Room	Structure	Member	Substrate	Wall	Result	Units	Pos/Neg	Time	Date
	3606 Rhone	Calibration					1.2	mg/cm2	Positive	9:14:49	8/21/2023
	3606 Rhone	Calibration					1.1	mg/cm2	Positive	9:17:44	8/21/2023
	3606 Rhone	Calibration					1.1	mg/cm2	Positive	9:19:20	8/21/2023
	3606 Rhone	Calibration					-0.1	mg/cm2	Negative	9:20:59	8/21/2023
	3606 Rhone	Calibration					-0.1	mg/cm2	Negative	9:21:45	8/21/2023
	3607 Rhone	Calibration					-0.2	mg/cm2	Negative	9:22:30	8/21/2023
1	3606 Rhone	Building	Room	Ceiling	Wood		-0.3	mg/cm2	Negative	15:28:16	8/21/2023
2	3606 Rhone	Building	Room	Ceiling	Wood		0.1	mg/cm2	Negative	15:29:10	8/21/2023
3	3606 Rhone	Building	Room	Ceiling	Wood		0.3	mg/cm2	Negative	15:31:02	8/21/2023
4	3606 Rhone	Building	Room	Ceiling	Wood		-0.1	mg/cm2	Negative	15:31:58	8/21/2023
5	3606 Rhone	Building	Room	Ceiling	Wood		-0.2	mg/cm2	Negative	15:32:48	8/21/2023
	3606 Rhone	Calibration					1.1	mg/cm2	Positive	16:14:11	8/21/2023
	3606 Rhone	Calibration					1.1	mg/cm2	Positive	16:15:43	8/21/2023
	3606 Rhone	Calibration					1.2	mg/cm2	Positive	16:17:15	8/21/2023
	3606 Rhone	Calibration					-0.1	mg/cm2	Negative	16:18:50	8/21/2023
	3606 Rhone	Calibration					-0.1	mg/cm2	Negative	16:19:32	8/21/2023
Company	Heuresis Corp.										
Model	Pb200i										
Type	XRF Lead Paint Analyzer										
Serial Num.	1905										
App Version	Pb200i-REL-4.0-29										



EMSL Analytical, Inc.

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EMSL Order: 092318680
Customer ID: BGES62
Customer PO:
Project ID:


Attention: Brian Braunstein BGES, Inc. 1042 East 6th Avenue Anchorage, AK 99501	Phone: (907) 696-0237 Fax: (907) 644-2901 Received Date: 08/23/2023 9:00 AM Analysis Date: 08/30/2023 Collected Date: 08/21/2023
Project: 3606 RHONZ CIR	

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
AS-01 <small>092318680-0001</small>	ROOF - ROOF & MATERIALS	Black Fibrous Homogeneous	15% Cellulose	80% Matrix 5% Non-fibrous (Other)	None Detected
AS-02 <small>092318680-0002</small>	ROOF - ROOF & MATERIALS	Black Fibrous Homogeneous	20% Cellulose	70% Matrix 8% Non-fibrous (Other)	2% Chrysotile
AS-03 <small>092318680-0003</small>	ROOF - ROOF & MATERIALS	Black Fibrous Homogeneous	15% Cellulose	80% Matrix 3% Non-fibrous (Other)	2% Chrysotile
AS-04 <small>092318680-0004</small>	ROOF - ROOF & MATERIALS	Black Fibrous Homogeneous	15% Cellulose	80% Matrix 3% Non-fibrous (Other)	2% Chrysotile
AS-05-Roofing <small>092318680-0005</small>	ROOF - ROOF & MATERIALS	Black Fibrous Homogeneous	15% Cellulose	80% Matrix 3% Non-fibrous (Other)	2% Chrysotile
AS-05-Silver Paint <small>092318680-0005A</small>	ROOF - ROOF & MATERIALS	Silver Non-Fibrous Homogeneous		90% Matrix 10% Non-fibrous (Other)	<1% Chrysotile

Result includes a small amount of inseparable attached material

Analyst(s) _____
Vivian Lee (6)


Cecilia Yu, Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

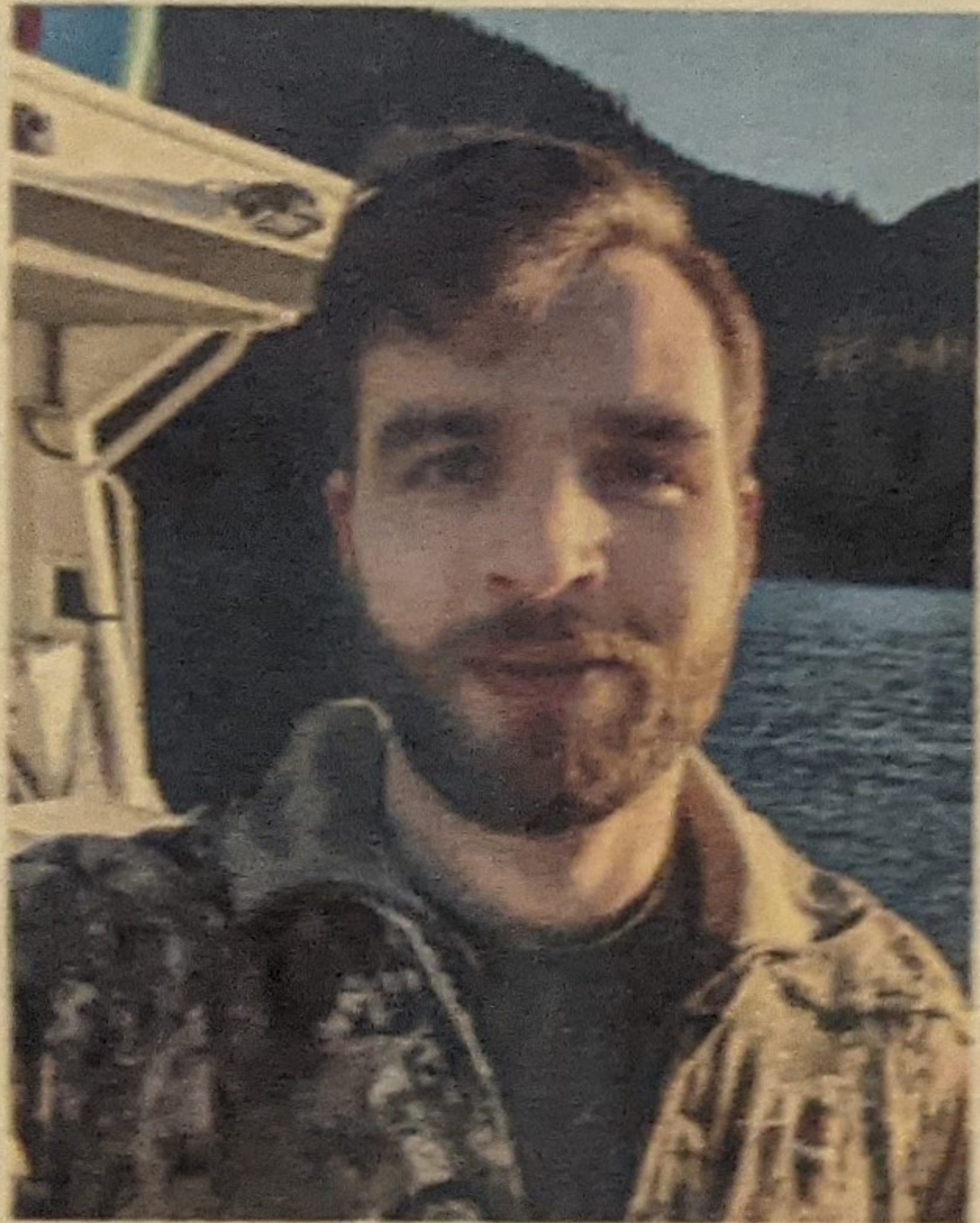
Samples analyzed by EMSL Analytical, Inc San Leandro, CA NVLAP Lab Code 101048-3, WA C884

Initial report from: 08/30/2023 15:49:39

APPENDIX C
BGES' PERSONNEL CERTIFICATIONS

United States Environmental Protection Agency

This is to certify that



Carson S Kent

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

Risk Assessor

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires March 02, 2024

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

Adrienne Priselac, Manager, Toxics Office

Land Division

LBP-R-I219617-1

Certification #

February 17, 2021

Issued On





1310 E 66th Avenue, Suite 2- Anchorage, AK 99518 - 907.332.0456

Certificate of Training

This is to certify that

Carson Kent

Has Attended and Successfully Completed
**Building Inspector Refresher
4 Hour Course**



This course is fully accredited by the Alabama Department of Environmental Management (ADEM) in compliance with TSCA Title II.

Certificate Number: TBI4-123-17499

Expiration Date: 1/13/2024

Alan Caldwell
Training Division Manager

1/13/2023

Exam Date:

1/13/2023

Course Date:

United States Environmental Protection Agency

This is to certify that



Rose B Kayotuk

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

Inspector

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires October 06, 2026

LBP-I-1146511-3

Certification #

July 14, 2023

Issued On



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

Adrienne Priselac, Manager, Toxics Office

Land Division

Certificate No: 5LM060523071R

Expiration Date: June 5, 2024

This is to certify that
Rose B. Kayotuk
has attended and successfully completed an
ASBESTOS INSPECTOR
REFRESHER TRAINING COURSE

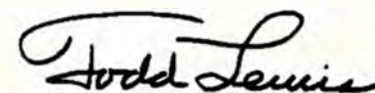
permitted by
the State of Minnesota under Minnesota Rules 4620.3702 to 4620.3722
and meets the requirements of
Section 206 of Title II of the Toxic Substances Control Act (TSCA)
conducted by

Lake States Environmental, Ltd.

Attended Remotely on June 5, 2023

Examination Date: June 5, 2023

Lake States Environmental, Ltd.
P. O. Box 645, Rice Lake, WI 54868
www.lakestates.com
(800) 254-9811



Training Instructor