

# SHISHMAN & ASSOCIATES INC.

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 Project No. 825.1

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**ENVIRONMENTAL CONSULTING SERVICES  
 RECONNAISSANCE ASBESTOS SURVEY  
 ELKS LODGE  
 ALBUQUERQUE, NEW MEXICO**

MR. BLANCHARD: Per your instructions, SHISHMAN & ASSOCIATES INC. (S&A) conducted a reconnaissance asbestos survey of subject facility in September 2000. Grouped in homogeneous areas, suspected asbestos-containing materials (ACMs) were identified, sampled and analyzed via PLM protocols at a NVLAP-accredited laboratory in Denver, Colorado. The objective of the survey was to ascertain presence/absence of asbestos in building components and materials observed in the facility, materials that could be disturbed by planned remodeling of the premises.

The following findings were documented via the reconnaissance survey and associated laboratory testing:

BUILDING COMPONENT or MATERIAL	LOCATION	ASBESTOS CONTENT	REMARKS	WORK CLASSIFICATION (OSHA)
Ceiling texture, finish coat, paint-encapsulated, on plaster ceiling	Foyer, Lobby, Ladies Lounge, TV Room, Lodge Room, Pool & Billiard Room, Card Room, Game Room, Ballroom, Dining Room, Main Bar & Cocktail Lounge, Corridors	~ 15% chrysotile asbestos	Regulated asbestos-containing material (RACM) which must be addressed before disturbance through re-modeling or demolition	Class I asbestos work
Texture, suspended plaster	Ballroom, Dining Room	~ 15% chrysotile asbestos	RACM	Class I asbestos work
Floor tiles, 9"x9"	Offices, hallways, meeting rooms, under carpet	~ 5% chrysotile asbestos	Category I nonfriable asbestos-containing material (ACM), non-regulated if kept nonfriable	Class II asbestos work
Floor tiles, 12"x12"	Bar (multi-layered)	~ 5% chrysotile asbestos	Category I non-friable ACM	Class II asbestos work
Acoustical ceiling panels, 2'x4'	Locker Rooms (N-E Addition), Corridors	~ 3% chrysotile	Category II ACM; can be replaced as maintenance activity, as required	Class III asbestos work
Roofing felts, materials, tar	Throughout	2%-40% chrysotile	Category I nonfriable ACM	Class II asbestos work

BUILDING COMPONENT or MATERIAL	LOCATION	ASBESTOS CONTENT	REMARKS	WORK CLASSIFICATION (OSHA)
Thermal system insulation (TSI) on fittings, tanks	Basement mechanical room	~ 10% chrysotile	RACM	Class I asbestos work
Ceiling plaster, scratch coat on metal lath	Foyer, Lobby, Offices, Ladies Lounge, TV Room, Lodge Room, Pool & Billiard Room, Card Room, Game Room, Ballroom, Dining Room, Main Bar & Cocktail Lounge, Corridors	Non-asbestos	Also found on ceilings in offices, under 12"x12" glued-on non-asbestos ceiling tiles	
Joint compound, tape, sheetrock wall	Offices by main entry	Non-asbestos		
Acoustic tile, 12"x12", east and west walls	Lodge Room	Non-asbestos	Spot of adhesive ("puck") also non-asbestos	
Floor tiles, 12"x12"	Bar, Dining Room	Non-asbestos	Black mastic also non-asbestos	
Black mastic	Underside of floor tiles, under carpeting in Dining Room	Non-asbestos	Unusual finding	
Plaster (finish), wall	Card Room, Game Room	Non-asbestos	Applied to scratch coat in wall	
Scratch coat, wall	Card Room, Game Room	Non-asbestos	Applied to metal lath	

## BACKGROUND

The following definitions are offered to clarify requirements imposed by environmental regulations:

### NESHAP Asbestos Terminology

Per the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M - National Emission Standard for Asbestos<sup>1</sup> regulations, "nonfriable asbestos-containing material" is defined as any material containing more than 1 percent asbestos, as determined using the PLM method, that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. "Category I nonfriable ACM" means asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than 1 percent asbestos. "Category II nonfriable ACM" means any material, excluding Category I nonfriable ACM, that contains more than 1 percent asbestos and is nonfriable. "Regulated asbestos-containing material" (RACM) means friable asbestos material, Category I nonfriable ACM that has become friable, Category I nonfriable ACM that will be disturbed and become friable, and Category II nonfriable ACM that has a high probability of becoming friable in the course of demolition or renovation operations.

<sup>1</sup> 40 CFR Part 61.

## NESHAP Regulations

Per the NESHAP regulations, prior to the commencement of any demolition or renovation activity in a building, all Regulated Asbestos-Containing Materials must be removed from that structure if the construction activity would break up, dislodge, or similarly disturb these material(s). NESHAP addresses not only friable asbestos-containing materials, but also those nonfriable ACMs that could become friable as a result of the planned demolition or renovation activity.

## OSHA Asbestos Terminology

- **Class I asbestos work** means activities involving the removal of thermal system insulation (TSI) and surfacing ACM and presumed ACM (PACM);
- **Class II asbestos work** means activities involving the removal of ACM which is not TSI or surfacing material;
- **Class III asbestos work** means repair and maintenance operations, where ACM may be disturbed.
- **Class IV asbestos work** means maintenance and custodial activities during which employees contact, but do not disturb, ACM or presumed ACM and activities to clean up dust, waste and debris resulting from Class I, II and III activities.
- **Surfacing material** means material that is sprayed, troweled-on or otherwise applied to surfaces;
- **Finishing material** means spackling, tape, and joint compounds used to produce a smooth surface across a wall.

## Lead-Based Paint Terminology

Lead-Based Paint is defined as paint or other surface coating that contains lead in excess of 1.0 milligrams per square centimeter or 0.5 percent by weight<sup>2</sup>.

Lead-containing paint (lead-paint) includes paints with below-regulatory threshold concentrations of lead, i.e., at concentrations below 0.5% lead by weight.

OSHA compliance levels for worker exposure and protection during the handling of lead are:

- 8-Hour Time-Weighted Average (TWA) Permissible Exposure Limit (PEL) = 50 µg/m<sup>3</sup>;
- 8-Hour TWA Action Level (AL) = 30 µg/m<sup>3</sup>.

## Lead-Containing Paints

Lead surveys and sampling (by others) showed that there are no lead-based paints in the facility, only outside the building in the parking areas. Lead-containing paints were documented on several walls and other building components in the facility.

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<sup>2</sup> Lead; Requirements for Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards in Housing; Final Rule; 24 CFR Part 35 (HUD) and 40 CFR Part 745 (EPA), published in the Federal Register on March 6, 1996.

## CONCLUSIONS AND DISCUSSION

Asbestos-containing materials documented in the facility (and listed in the TABLE above) must be addressed if any planned remodeling activity would result in a disturbance which could cause the material(s) to become friable and release fibers. Per the NESHAP regulation, Category I and Category II nonfriable ACMs which remain nonfriable during demolition are not regulated by the EPA; however, protection of workers handling asbestos (and/or lead) is required by the OSHA standards.

Results of the reconnaissance survey summarized in the TABLE indicate that there are several classes and types of ACMs located throughout the Elks Lodge. If the design proposed for remodeling and/or tenant improvements will cause disturbance of the Category I nonfriable ACMs and/or Category II nonfriable ACMs, the affected materials must be re-classified as RACMs per EPA regulations and must be removed prior to demolition. Respiratory and personal protection of workers handling asbestos must be provided per the OSHA standards.

## RECOMMENDATIONS

To implement the Architect's design for the remodeling of the facility in compliance with applicable federal, state and local environmental regulations and guidelines, a licensed abatement contractor with certified asbestos workers must be engaged for the removal and disposal of Regulated Asbestos-Containing Materials prior to commencement of any demolition of documented ACMs. In addition, OSHA regulations require the protection of workers handling asbestos and/or lead at safety levels established via initial exposure assessments conducted for typical activities performed on this job.

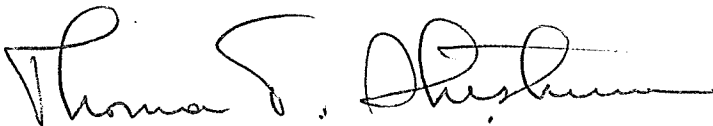
Categorization of planned removal activities per EPA regulations and respective OSHA work classifications for the asbestos-containing or lead-paint coated materials to be disturbed on the project will be determined and specified for the abatement contractor on project drawings and in technical specifications.

## CLOSING

In case of questions about the asbestos-containing materials documented in the Elks Lodge, call us at tel. 505.237.9800.

Sincerely yours,

SHISHMAN & ASSOCIATES INC.



Thomas T. Shishman, REM  
President

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