

To:	Sarah Bernhard	From:	Colby Hunt
Company:	Tacoma Alpha Land Investors, LLC c/o Williams & Dame Development, Inc.	Date:	August 20, 2007
Address:	1308 NW Everett Street Portland, OR 97209		
cc:	N/A		
GDI Project:	WilliamsD-30-04		
RE:	Tacoma Elks Lodge, 565 Broadway, Tacoma, Washington Supplemental Asbestos Services		

BACKGROUND

This memorandum summarizes the results of supplemental asbestos services at the Tacoma Elks Lodge site located at 565 Broadway in Tacoma, Washington (project site). GeoDesign completed a Phase I Environmental Site Assessment (ESA) of the project site in February 2007; however, GeoDesign personnel were unable to access the interior of the former Tacoma Elks Lodge building at the time of the February 2007 Phase I ESA. GeoDesign returned to the project site and completed a limited asbestos survey and limited lead-based paint survey in May 2007. Lead-based paint was detected on painted surfaces throughout the interior and exterior of the on-site structure. Asbestos was detected in wall and ceiling texture, pipe insulation, floor tile, sheet flooring, and mastic inside the project site structure, as well as roofing materials on an addition to the project site structure constructed in 1937.

At the time of the May 2007 limited asbestos survey, we were unable to access the roof of an addition to the project site structure constructed in 1948 (1948 Addition), and plaster and skim coat present on some interior surfaces were not sampled. In addition, several debris piles present throughout the project site structure were not sampled during the May 2007 limited asbestos survey.

FIELD ACTIVITIES

GeoDesign personnel returned to the project site on August 8, 2007 to complete additional sampling activities and observe the contents of the debris piles. We observed two small debris piles on the first floor of the project site structure; one debris pile consisting of wire mesh and plaster was observed in the stairway near the northwestern corner of the building and one debris pile consisting of broken glass, tape, and drywall was observed in the entryway to the pool area located south of the stairway, near the western interior wall. Suspect asbestos containing materials (ACMs) or dust suspecting of containing asbestos were not observed in either debris pile observed on the first floor. We observed two debris piles in the ballroom area on the second floor. The western-most debris

pile, located east of the stage area, consisted of drywall and plaster. The second debris pile was located near the center of the ballroom and consisted of wire, polyvinyl chloride pipe, glass, and ornamental plaster. In addition, we also observed plaster debris scattered across the eastern portion of the ballroom floor. Suspect ACMs or dust suspecting of containing asbestos were not observed among the debris observed on the second floor. We also observed some wood, metal, and carpet debris on the second floor mezzanine. Suspect ACMs were not observed among the material on the second floor mezzanine.

We observed two large debris piles on the third floor, one near the center of the floor and the other near the northeastern corner of the third floor. The debris pile located near the center of the floor consisted of dimensional lumber, old appliances, wire, light fixtures, miscellaneous refuse, dust, and numerous floor tiles. The floor tiles observed in this debris pile appeared consistent with asbestos-containing floor tiles identified during our May 2007 survey. The debris pile located near the northeastern corner of the third floor consisted of 2-foot by 2-foot ceiling tiles, metal storage racks, plaster debris, ornamental plaster, dust, and broken glass. With the exception of the dust, suspect ACMs were not observed in this debris pile. We also observed wire mesh, plaster debris, and dust throughout the fourth floor ballroom. With the exception of dust, suspect ACMs were not observed among the debris observed on the fourth floor.

ANALYTICAL RESULTS

A total of 10 samples were collected from the former Tacoma Elks Lodge building, including oven insulation on first floor, ornamental plaster, ceiling plaster, wall plaster and scratch coat, debris pile dust from both debris piles observed on the third floor and from three locations on the fourth floor, and roofing material from the 1948 addition. The 10 samples were submitted to EMC Laboratories (EMC) of Phoenix, Arizona, for analysis. EMC is accredited by the National Institute of Standards and Technology under the procedures of the National Voluntary Laboratory Accreditation Program for bulk sample analysis. The samples were analyzed for percent asbestos content by U.S. Environmental Protection Agency Method 600/M4-82-020. Based on the analytical results, asbestos was not detected at concentrations greater than or equal to 1 percent in any of the samples analyzed. The laboratory analytical results are summarized in Table 1, and a copy of the laboratory analytical report is attached to this memorandum.

CRH:REB:kt

Attachments

One copy submitted (via email only)

Document ID: WilliamsD-30-04-082007-envm.doc

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TABLES

TABLE 1
Summary of Suspect ACMs Analytical Results ¹
Tacoma Elks Lodge
565 Broadway
Tacoma, Washington

Sample I.D.	Layer	Floor	Location	Homogenous Material Description	Material Type (S,T,M)	Friable (Y/N)	Asbestos	Approximate Quantity (square feet)
S-53	1	1	Entryway to Pool	White Oven Insulation	T	Y	ND	NA
	2			White Ornamental Plaster	M	Y	ND	NA
S-54	1	2	Ballroom	Beige Paint	S	Y	ND	NA
	2			Gray Debris Pile Dust	M	Y	ND	NA
S-55	1	3	Northwest Corner	Gray Debris Pile Dust	M	Y	ND	NA
S-56	1	3	Center of Room	Gray Debris Pile Dust	M	Y	ND	NA
S-57	1	4	Western Wall	Gray Debris Pile Dust	M	Y	ND	NA
S-58	1	4	Eastern Wall	Gray Debris Pile Dust	M	Y	ND	NA
S-59	1	4	Center	Gray Debris Pile Dust	M	Y	ND	NA
S-60	1	4	Ballroom	Light Gray/Tan Ceiling Plaster	S	Y	ND	NA
	2			Light Gray Wall Plaster-Scratch Coat	S	Y	ND	NA
S-61	1	4	Stairway	Off White/Light Orange Wall Plaster-Finish Coat	S	Y	ND	NA
	2			Black Roofing	S	N	ND	NA
	3			Black Roofing	S	N	ND	NA
	4			Black Roofing	S	N	ND	NA
S-62	1	NA	1948 Addition	Black Roofing	S	N	ND	NA
	2			Black Roofing	S	N	ND	NA
	3			Black Roofing	S	N	ND	NA
	4			Black Roofing	S	N	ND	NA

Notes:

1. Polarized light microscopy performed by EMC Laboratory of Phoenix, Arizona.

ACM: asbestos-containing materials

M: miscellaneous

NA: not applicable

ND: not detected above 1 percent

S: surfacing

T: thermal insulation

Figure 1. (a) Schematic of the experimental setup. (b) Photograph of the experimental setup.

ATTACHMENT

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

Laboratory Report

0056873

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client: GEO DESIGN
Address: 1201 SE TECH CENTER DR, STE 160
VANCOUVER WA 98683
Collected: 08/08/2007
Project Name/ Address: TACOMA ELKS LODGE

Job# / P.O. #: WILLIAMSD-30-04
Date Received: 08/10/2007
Date Analyzed: 08/13/2007
Date Reported: 08/13/2007
EPA Method: EPA 600/M4-82-020
Submitted By: COLBY HUNT
Collected By: Customer

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0056873-001 S-53	1ST FL ENTRY	Oven Insulation, White	No		Fibrous Glass 95% Gypsum Binder/Filler 5%
0056873-002 S-54	2ND FL	LAYER 1 Ornamental Plaster, White	No		Cellulose Fiber 1% Gypsum Perlite Mica Carbonates Binder/Filler 99%
		LAYER 2 Paint, Beige	No		Talc <1% Gypsum Carbonates Quartz Binder/Filler 99%
0056873-003 S-55	3RD FL	Debris Pile Dust, Gray	No		Cellulose Fiber 1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
0056873-004 S-56	3RD FL	Debris Pile Dust, Gray	No		Cellulose Fiber 20% Gypsum Carbonates Mica Quartz Binder/Filler 80%
0056873-005 S-57	4TH FL-WESTERN WALL	Debris Pile Dust, Gray	No		Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%

EMC LABS, INC.

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Laboratory Report
0056873

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	GEO DESIGN	Job# / P.O. #:	WILLIAMSD-30-04
Address:	1201 SE TECH CENTER DR, STE 160	Date Received:	08/10/2007
	VANCOUVER WA 98683	Date Analyzed:	08/13/2007
Collected:	08/08/2007	Date Reported:	08/13/2007
Project Name/	TACOMA ELKS LODGE	EPA Method:	EPA 600/M4-82-020
Address:		Submitted By:	COLBY HUNT
		Collected By:	Customer

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0056873-006 S-58	4TH FL-EASTERN WALL	Debris Pile Dust, Gray	No		Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
0056873-007 S-59	4TH FL-CENTER	Debris Pile Dust, Gray	No		Cellulose Fiber <1% Gypsum Carbonates Mica Quartz Binder/Filler 99%
0056873-008 S-60	4TH FL	Ceiling Plaster, Tan/ Lt. Gray	No		Cellulose Fiber <1% Gypsum Mica Quartz Binder/Filler 99%
0056873-009 S-61	4TH FL	LAYER 1 Wall Plaster-Scratch Coat, Lt. Gray	No		Gypsum Perlite Mica Quartz Binder/Filler 100%
		LAYER 2 Wall Plaster-Finish Coat, Off White/ Lt. Orange	No		Gypsum Carbonates Mica Quartz Binder/Filler 100%

EMC LABS, INC.

9830 S. 51st Street, Suite B109, Phoenix, AZ 85044
Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

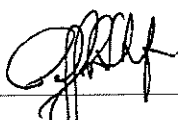
Laboratory Report
0056873

Bulk Asbestos Analysis by Polarized Light Microscopy

NVLAP#101926-0

Client:	GEO DESIGN	Job# / P.O. #:	WILLIAMSD-30-04
Address:	1201 SE TECH CENTER DR, STE 160	Date Received:	08/10/2007
	VANCOUVER WA 98683	Date Analyzed:	08/13/2007
Collected:	08/08/2007	Date Reported:	08/13/2007
Project Name/	TACOMA ELKS LODGE	EPA Method:	EPA 600/M4-82-020
Address:		Submitted By:	COLBY HUNT
		Collected By:	Customer

Lab ID Client ID	Sample Location	Layer Name / Sample Description	Asbestos Detected	Asbestos Type (%)	Non-Asbestos Constituents
0056873-010 S-62	1948 ADDITION	LAYER 1 Roofing, Black	No		Cellulose Fiber 45% Gypsum Quartz Binder/Filler 55%
		LAYER 2 Roofing, Black	No		Cellulose Fiber 45% Synthetic Fiber 2% Gypsum Quartz Binder/Filler 53%
		LAYER 3 Roofing, Black	No		Cellulose Fiber 45% Gypsum Carbonates Binder/Filler 55%
		LAYER 4 Roofing, Black	No		Fibrous Glass 10% Gypsum Quartz Binder/Filler 90%



Analyst - Paul Hofer



Signatory - Lab Director - Kurt Kettler

Distinctly stratified, easily separable layers of samples are analyzed as subsamples of the whole and are reported separately for each discernable layer. All analyses are derived from calibrated visual estimate and measured in weight percent unless otherwise noted. The report applies to the standards or procedures identified and to the sample(s) tested. The test results are not necessarily indicative or representative of the qualities of the lot from which the sample was taken or of apparently identical or similar products, nor do they represent an ongoing quality assurance program unless so noted. These reports are for the exclusive use of the addressed client and that they will not be reproduced wholly or in part for advertising or other purposes over our signature or in connection with our name without special written permission. The report shall not be reproduced except in full, without written approval by our laboratory. The samples not destroyed in testing are retained a maximum of thirty days. The laboratory measurement of uncertainty for the test method is approximately $\pm 1\%$ by weight. Accredited by the National Institute of Standards and Technology, Voluntary Laboratory Accreditation Program for selected test method for asbestos. The accreditation or any reports generated by this laboratory in no way constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology. The report must not be used by any entity to claim product endorsement by NVLAP or any agency of the U.S. Government. Polarized Light Microscopy may not be consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials.