



GEM ENVIRONMENTAL, INC.

Hazardous Materials & Industrial Hygiene Services

ASBESTOS AND LEAD-CONTAINING PAINT **INSPECTION REPORT**

Prepared for:
Missoula County Facilities Management
199 W. Pine St. Missoula, MT 59802

SITE:
Former Missoula County Youth Court
311 Woody St. Missoula, MT, 59802

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Report Date: July 06, 2026
Revision: 1.0

GEM Environmental, Inc. (GEM) was retained by Missoula County Facilities Management to perform a limited asbestos-containing materials (ACM) and lead-containing paint (LCP) inspection at the Former Missoula County Youth Court, located at 311 Woody St. in Missoula, Montana. The inspection was conducted on January 15th, 2026, by Montana DEQ-accredited inspector Mr. Christopher E. Casas in support of planned construction activities.

Key findings include:

- **Confirmed ACM** primarily located in the smooth ceiling texture & drywall system (asbestos containing mud layer) installed as the original ceiling cap in a single office on the main level.
- **Confirmed LCP (including LBP)**, beige paint with white base coat applied to the plaster walls/ceiling installed as the original walls/ceiling throughout the main level & 2nd floor, and the red coat applied to the original wood tongue & groove flooring throughout the main level & 2nd floor.

Conclusions: The inspection identified confirmed asbestos-containing building materials (ACBM ≥1% asbestos) and lead-containing paint/coatings (LCP/LBP) in multiple locations throughout the structure. These materials represent regulated hazards that must be properly managed prior to and during planned construction activities to protect worker safety and prevent environmental releases.

Recommendations: Engage Montana DEQ-accredited contractors for all asbestos abatement, transportation, and disposal activities prior to or during construction. Conduct independent monitoring and post-disturbance clearance verification (visual inspection and aggressive air sampling as appropriate) to document compliance and safe re-occupancy following any ACM disturbance/removal.

- **Asbestos:** Engage Montana DEQ-accredited asbestos abatement contractors for the complete removal, transportation, and disposal of all confirmed ACM in accordance with EPA NESHAP, Montana DEQ (ARM 17.74), and OSHA regulations. Independent project monitoring and post-abatement clearance verification (visual inspection + aggressive air sampling) should be performed by a qualified third-party Industrial Hygienist.
- **Lead:** All disturbance of lead-containing paint/coatings (LCP/LBP) must be performed by personnel meeting EPA/OSHA requirements.
 - EPA RRP Rule (40 CFR Part 745) requires certified renovators, lead-safe work practices, containment, and cleanup verification. Or EPA-certified Lead Abatement Supervisors and workers when full lead abatement (removal) is performed under 40 CFR Part 745, Subpart L.
 - OSHA Lead in Construction (29 CFR 1926.62) for any lead work requires exposure assessment, controls, PPE, and medical surveillance unless a negative exposure assessment is documented.
- **Waste:** Lead-containing debris is hazardous (D008) if TCLP ≥5.0 mg/L (40 CFR 261.24). A conservative screening estimated weighted average total lead below the 100 mg/kg rule-of-thumb threshold, indicating low likelihood of D008 classification; TCLP confirmation is recommended prior to renovation to ensure compliance.

A summary of confirmed ACBM locations, types, quantities, and cross-contamination findings by functional space is provided in Table 1 (ACM). A summary of confirmed LBP/LCP locations, types, and quantities by functional space is provided in Table 2 (LCP/LBP).



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Ethan Redfern, Facilities & Capital Improvements Assistant Director, contracted with GEM Environmental, Inc. (GEM) to provide an asbestos-containing materials & lead-containing paint inspection. The inspection services were completed for the Missoula Youth Court, located at 311 Woody Ave. in Missoula MT.

This report presents the results of our visual inspection, tactile assessment, and laboratory analysis of the samples collected by Mr. Christopher E. Casas on, 05.20.26.

1.1 SCOPE OF WORK

The scope of work for this project included a limited hazardous building materials inspection of the readily and safely accessible portions of the project area. The inspection encompassed a thorough visual assessment, bulk sampling, and documentation of the following materials:

- **Asbestos-Containing Materials (ACM)** – including suspect building materials such as surfacing materials, thermal system insulation, roofing materials, floor coverings, mastics, and miscellaneous sealants/gaskets.
- **Lead-Containing Paint/Coatings (LCP/LBP)** – on painted and varnished building components.

The primary purpose of this inspection was to identify and document the locations, types, and estimated quantities of regulated hazardous building materials present in the project area. This report provides a current, time-specific snapshot of identified materials to support regulatory compliance and planned construction activities.

Suspect materials were identified and grouped into homogeneous areas where applicable, with findings delineated by functional space (e.g., offices, garage, warehouse, and attic) to enable precise mapping and documentation.

Bulk samples for asbestos were collected from representative homogeneous areas using discreet, wet methods with immediate repairs to prevent fiber release. Samples were submitted under chain-of-custody to an NVLAP-accredited laboratory for polarized light microscopy (PLM) analysis. XRF testing for lead was performed using a SciAps X-550 analyzer in accordance with HUD Guidelines (2012 Revision) and EPA-recognized protocols.

This report provides summary tables, figures, site diagrams, and laboratory results documenting the locations and quantities of confirmed ACM, LCP/LBP. The inspection represents a time-specific snapshot of conditions as observed during the site visits.



1.2 BACKGROUND

The asbestos-containing materials (ACM) and lead-containing paint (LCP) inspection of the structure was initiated by Ethan Redfern, with Missoula County Facilities. Mr. Ethan Redfern contacted Mr. Christopher Casas, Industrial Hygienist with GEM Environmental, Inc. (GEM), via phone in early May 2026 to request a limited building inspection for ACM and LCP.

The inspection was conducted for the purpose of identifying and documenting the locations of ACM and LCP in support of planned construction activities. The objective was to provide with a current, time-specific snapshot of the location, type, and quantity of ACM and LCP throughout the readily accessible portions of the project area.

This report assists FSB in understanding the presence of hazardous materials prior to renovation or construction, enabling appropriate planning for compliance with applicable federal (EPA, HUD, OSHA) and Montana DEQ regulations during future work. No renovation, demolition, or other construction activities are currently underway.

The inspection was performed by Mr. Christopher E. Casas. Where applicable, relevant findings from any prior reports were reviewed and incorporated; however, this assessment represents an independent evaluation based on conditions observed during the current site visit.

1.2.1 CONSTRUCTION ACTIVITIES

The planned construction activities involve substantial removal and replacement of a majority of the existing interior ceiling/wall/floor coverings throughout the building. For planning purposes, all interior and a limited amount of exterior building materials will be impacted by construction activities. No demolition plans were provided by Missoula County, but their representative Ethan Redfern met with GEM on site, and the planned demolition activities were discussed.

- Removal of all present roofing systems down to the decking.
- Removal of the HVAC roof mounted unit, for subsequent re-use in another building.
- Removal of the HVAC ductwork and attic insulation.
- Removal of all floor coverings
- Removal/impact to select wall/ceiling coverings.

1.3 PROJECT AREA

The “project area” was established based on information provided to GEM by FSB to include all the safely and readily accessible materials which are scheduled to be impacted located in the basement, main level, and 2nd floor of the structure. In addition, the built-up roof systems were included. Please refer to Figure 1. For a illustrative diagram of the project area.

2.0**INSPECTION PROCEDURES****2.1 ASBESTOS INSPECTION**

This asbestos inspection was conducted by Mr. Christopher Casas, who maintains current Montana DEQ accreditation as an Asbestos Inspector, Management Planner, Contractor/Supervisor, and Project Designer. Copies of Mr. Casas's current DEQ accreditation certificates and most recent state-required refresher training documentation are provided in Appendix C.

The inspection was performed in full accordance with ARM 17.74.354 (Administrative Rules of Montana). Sampling protocols generally followed the requirements of the Asbestos Hazard Emergency Response Act (AHERA) as codified in 40 CFR Part 763.86, which represents the widely accepted industry gold standard for asbestos building inspections, as well as ASTM E2356-18 (Standard Practice for Comprehensive Building Asbestos Surveys) and NESHAP requirements (40 CFR Part 61, Subpart M).

The primary objective was to identify and document the locations of asbestos-containing materials (ACM) and presumed asbestos-containing materials (PACM) throughout the structure, with emphasis on delineating confirmed ACM by functional space. This functional-space organization enables precise mapping of ACM locations and supports planning for upcoming construction activities, including targeted abatement, containment, or work-plan development as needed.

The inspection represents a time-specific snapshot of conditions observed during the site visit.

2.1.1 Pre-Inspection Preparation

Available building records, including blueprints, previous inspection reports, and renovation history, were reviewed to identify potential ACM locations and historical uses of functional spaces. Site access permissions were obtained, and coordination with the building owner/occupant was conducted to minimize disruptions. Functional spaces were designated based on building layout and usage (e.g., classrooms, corridors, mechanical rooms, roof areas) to ensure comprehensive, non-overlapping coverage.

2.1.2 Field Inspection Procedures

The inspection relied on a thorough visual examination of the entire structure to identify and differentiate all building materials present, assess the physical condition of each material through direct observation and tactile evaluation (hand pressure test for friability), and document the precise location and extent of each suspect material within every functional space in the project area. This functional-space-specific approach provides an accurate, time-specific snapshot of building conditions at the time of inspection and enables precise mapping of confirmed ACM.

Suspect materials were grouped into homogeneous areas (HAs) based on similar appearance, texture, color, and application date within each functional space. Sample locations were strategically chosen to



be as discreet as possible while remaining representative of the HA. Randomness as recommended by AHERA was not incorporated; instead, sampling prioritized accessibility, visibility of potential damage, and representation of varying conditions within the HA.

Bulk samples were collected from each HA using AHERA-recommended protocols (minimum 3 samples per HA for surfacing materials >1,000 ft²; additional samples as needed for TSI and miscellaneous materials). Where necessary, GEM carefully exposed concealed older materials (e.g., by cutting through overlying carpet to reveal underlying floor tile) while maintaining discreet sampling locations that would not be readily noticeable to building occupants. Interim controls (e.g., immediate repair of sampling points) were implemented to prevent fiber release or nuisance dust generation. All debris generated during sampling was promptly removed using HEPA-vacuuming and wet-wiping methods. Sampling locations were fully repaired upon completion (e.g., re-mudding and feathering drywall patches).

Site diagrams showing all suspect ACM sampling locations are presented in Figure 1.

2.1.3 Laboratory Analysis

Each sample was placed in an airtight container, assigned a unique sample identification number, and submitted under strict chain-of-custody protocol to Eurofins | CEI Laboratories in Cary, North Carolina for analysis by polarized light microscopy (PLM).

Eurofins | CEI Laboratories is accredited by the United States Department of Commerce National Institute of Standards and Technology (NIST) under the National Voluntary Laboratory Accreditation Program (NVLAP) for Bulk Asbestos Fiber Analysis (NVLAP Lab Code 107068-0). This accreditation demonstrates ongoing proficiency and satisfies the requirements of the Montana Department of Environmental Quality (MT-DEQ) for asbestos analysis.

Bulk asbestos samples were analyzed by qualified microscopists who are trained, certified, and regularly demonstrated to be proficient through internal laboratory quality assurance/quality control (QA/QC) programs as well as applicable regulatory requirements.

The microscopists identified and estimated the percentage of asbestos fibers by volume using polarized light microscopy (PLM) supplemented by dispersion staining (PLM/DS). Analyses were performed in accordance with EPA Method 600/R-93/116 and the interim protocol described in EPA 600/M4-82-020.

It should be noted that PLM point-counting and visual estimation methods involve a degree of subjectivity on the part of the microscopist, including judgments regarding fiber identification, differentiation from non-asbestos materials, and percentage estimation. Results therefore represent the professional opinion of the analyst based on training, experience, and the specified methodology.

Per client request, all samples initially reported as containing less than one percent (<1%) asbestos by visual area estimation under EPA Method 600/R-93/116 were further analyzed using the 400-point count procedure specified in the method. This additional quantitative point-count analysis provides a semi-quantitative analytical sensitivity of approximately 0.25% asbestos by volume.



2.1.5 Assessment and Classification

A comprehensive summary of suspect, confirmed, and assumed asbestos-containing building materials is provided in Table 1. Regulatory considerations, sampling requirements, and Montana DEQ asbestos category definitions (Category I, Category II, and Regulated Asbestos-Containing Material – RACM) are detailed in Appendix B.

2.2 LEAD INSPECTION

The lead-containing paint (LCP) inspection was performed by Mr. Christopher Casas, who holds current accreditation as a Lead-Based Paint Inspector, Lead Risk Assessor, and Lead Contractor/Supervisor. Documentation of the inspector's accreditation is presented in Appendix C.

The inspection was conducted in general accordance with the U.S. Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Revision), EPA-recognized protocols for XRF testing of lead in paint, and applicable OSHA worker protection standards. The primary objective was to identify and catalogue painted building components and their corresponding substrate materials coated with lead-based paint (LBP) or lead-containing paint (LCP), with emphasis on delineating confirmed LCP by functional space to facilitate targeted management, renovation, demolition, or abatement planning.

Site diagrams depicting sample locations for suspect lead-containing coatings are presented in Figure 1. Locations of confirmed lead-containing paint are presented in Figure 3. A summary of confirmed lead-containing coatings is presented in Table 2. A summary of lead-based paint regulations and the XRF Performance Characteristic Sheet are presented in Appendix B.

2.2.1 Pre-Inspection Preparation

Available building records, including blueprints, previous reports, and renovation history, were reviewed to identify potential LCP locations and historical painting practices within functional spaces. Functional spaces were designated based on building layout and usage (e.g., classrooms, corridors, mechanical rooms, kitchens, exterior siding areas) to ensure comprehensive, non-overlapping coverage and precise mapping of confirmed LCP.

2.2.2 Field Inspection Procedures

Field activities began with a thorough visual inspection of the entire structure to identify suspect homogeneous areas of paint, familiarize the inspector with the building's unique painting history, and designate functional spaces. Following the visual inspection, a physical assessment of each identified homogeneous area was completed to verify the extant condition of the paint (intact, good, fair, or poor). The inspection then proceeded with a surface-by-surface assessment of all painted and/or varnished surfaces within the structure. Paints were grouped into representative homogeneous areas based on visual similarity (color, texture, substrate, and apparent application period) within each functional space.



This functional-space-specific approach ensured accurate identification and cataloguing of LCP-coated components by location, enabling targeted recommendations for future activities.

GEM used a SciAps Model X-550 XRF spectrum analyzer (manufactured in 2025) to measure lead concentrations nondestructively. Sampling was conducted following the procedures and protocols outlined in the EPA's Standard Operating Procedures for Measurement of Lead in Paint Using the SciAps X-550 X-Ray Fluorescence Spectrometer, Chapter 7 (July 2012 Revision) of HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, and the manufacturer's Performance Characteristic Sheet for the SciAps X-550.

The SciAps XRF analyzer was operated in IH/OSHA mode, which uses a 10-second timed assay to determine lead concentration. This mode provides an average precision (95% confidence) of approximately 0.2 mg/cm². Readings were continued until the instrument achieved the action level (1.0 mg/cm²) within the set precision limit or until sufficient data were collected to characterize the homogeneous area.

XRF readings were collected from each identified homogeneous area of paint. A representative number of readings were taken from a subset of components considered by the certified inspector to be of like-coated surfaces and representative of the painted homogeneous area under investigation within each functional space. Consistent with a conservative approach, the highest measured concentration of lead surface loading per painted homogeneous area is reported in Table 2 and is assumed to be representative of the entire homogeneous area, reflecting a "worst-case" scenario.

Lead-based paint is defined as a coating exhibiting lead concentration ≥ 1.0 mg/cm² (HUD criterion). GEM applied a conservative approach by also classifying any coated surface exhibiting detectable lead concentrations >0.10 mg/cm² but <1.0 mg/cm² as a "lead-containing" coating.

2.2.4 Instrument Principle

X-ray fluorescence (XRF) operates on the principle of atomic excitation and subsequent emission of characteristic fluorescent X-rays. The SciAps X-550 contains a gold (Au) anode source that, when energized, produces radiation directed at the painted surface. This radiation excites lead atoms in the coating, causing them to emit fluorescent X-rays at known energies specific to lead. The instrument's detector senses these characteristic emissions and quantifies lead concentration as mass per unit area (mg/cm²).

2.3 QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC)

GEM implemented rigorous quality assurance and quality control measures throughout the asbestos and lead-containing paint inspections to ensure the accuracy, completeness, and defensibility of the data collected. These measures were consistent with AHERA (40 CFR Part 763), HUD Guidelines (2012 Revision), EPA-recognized XRF protocols, Montana ARM 17.74.354, and generally accepted professional practices.

Key QA/QC actions performed for this project included:



- **Field Completeness Review:** Prior to departing the site each day, inspection forms, sample logs, and site diagrams were reviewed for completeness. This included verification that a sufficient number of bulk samples had been collected for each homogeneous area (HA) of suspect ACM (per AHERA minimums, unless the material was assumed ACM) and that all sample and XRF testing locations were accurately marked on site diagrams.
- **Field Verification of Site Conditions:** Locations of major mechanical components and architectural features relevant to the inspection were confirmed in the field. Any discrepancies between architect-provided diagrams and actual site conditions were noted on field diagrams and subsequently incorporated into the final report figures.
- **XRF Instrument Performance Checks:** The SciAps X-550 XRF analyzer automatically performs an energy calibration and resolution check upon startup and as required during operation to confirm proper function. GEM conducted additional quality-control checks before, during (for multi-day surveys), and after data collection. These checks utilized a National Institute of Standards and Technology (NIST)-traceable 1.02 mg/cm² red standard reference material paint film backed by a common building substrate. Averaged calibration check readings were compared against the manufacturer's factory calibration values and the instrument-specific tolerance limits specified in the Performance Characteristic Sheet (PCS). Results that exceeded tolerance limits would have triggered re-calibration or termination of testing; all checks for this project were within acceptable limits (see attached XRF QA/QC Summary Sheets in Appendix [X] for daily results).
- **Chain-of-Custody and Sample Integrity:** All bulk asbestos samples were maintained under strict chain-of-custody protocols from collection through laboratory submission, with immediate with immediate interim repairs to sampling points to prevent fiber release.

2.4 DATA QUALITY OBJECTIVES

Data Quality Objectives (DQOs) were established prior to field activities to ensure that the data collected during the asbestos and lead-containing paint inspection would be of sufficient quality, quantity, and defensibility to support regulatory compliance decisions and construction planning. The DQOs were developed in accordance with EPA guidance on systematic planning (EPA QA/G-4) and were tailored to the objectives of identifying and characterizing regulated hazardous building materials prior to renovation and demolition activities.

The primary decision to be supported by the data was whether asbestos-containing materials (ACM) and lead-containing paint/coatings (LCP/LBP) are present in the project area, and if so, to accurately determine their locations, quantities, and regulatory status so that appropriate abatement, worker protection, and waste management measures can be implemented.

The following Data Quality Indicators (DQIs) were applied using the PARCC framework:

- **Precision:** Bulk asbestos samples were collected in accordance with AHERA-recommended minimum sample densities for each homogeneous area. Laboratory analysis was performed by NVLAP-accredited microscopists using EPA Method 600/R-93/116. All samples reported as containing less than 1% asbestos by visual estimation were further analyzed by the 400-point



count method to achieve a semi-quantitative sensitivity of approximately 0.25%. Replicate XRF readings were collected on selected homogeneous areas to evaluate instrument precision and within-material variability.

- **Accuracy:** Asbestos laboratory results were generated by Eurofins | CEI Laboratories (NVLAP Lab Code 107068-0), which maintains ongoing proficiency through internal QA/QC programs and participation in applicable accreditation schemes. XRF instrument performance was verified daily using a NIST-traceable 1.02 mg/cm² standard reference material. All calibration checks met the acceptance criteria specified in the SciAps X-550 Performance Characteristic Sheet.
- **Representativeness:** The inspection utilized a functional-space approach in which suspect materials were identified, grouped into homogeneous areas, and sampled within each distinct functional space. This methodology ensures that the data accurately reflect conditions across the different areas of the building that will be impacted by construction activities. Sampling locations were selected to be representative of each homogeneous area while remaining discreet.
- **Completeness:** All planned homogeneous areas of suspect ACM and LCP were visually assessed. A sufficient number of bulk samples were collected from each homogeneous area in accordance with AHERA protocols (or the material was assumed to be ACM). All XRF testing locations were documented on site diagrams, and chain-of-custody was maintained for all samples submitted to the laboratory.
- **Comparability:** All asbestos samples were analyzed by the same NVLAP-accredited laboratory using consistent EPA-approved methods. XRF measurements were collected using standardized operating procedures and the same instrument throughout the project. Results are reported in standard regulatory units (percent asbestos by volume and mg lead/cm²) to allow direct comparison with applicable federal and state criteria.

These DQOs were met for the data collected during this inspection. The resulting dataset is considered adequate to support the conclusions and recommendations presented in this report regarding the presence, location, and regulatory classification of ACM and LCP within the project area.

3.0

FINDINGS

A General description of the site building and the findings of GEMs asbestos & lead-containing paint inspections are detailed below;

3.1 BUILDING SUMMARY

The structure is represented by a single functional area.

The original building was constructed in the early 1900s and is made from wood/timber framing/decking with a red brick finish over concrete foundation walls.

The interior of the building has been heavily renovated over multiple phases from initial construction. The original building was finished with plaster over wood & lathe as wall/ceiling coverings with wood Tonge and groove flooring. Additional wall/floor/ceiling coverings have been added during multiple phases of construction which include gypsum board/texture systems, wall paneling, carpeting, vinyl sheet floorings, etc.

3.2 ASBESTOS

Table 1 provides a comprehensive summary of all suspect asbestos-containing materials identified during the current inspection. For each homogeneous area (HA), the table includes material description, laboratory analytical results, NESHAP/Montana DEQ regulatory category (Category I nonfriable, Category II nonfriable, or Regulated Asbestos-Containing Material – RACM), and observed condition/friability.

A total of **forty (40)** suspect homogeneous materials were sampled during the inspection. Laboratory analysis confirmed **Two (2)** materials contain asbestos at concentrations $\geq 1\%$ and are therefore classified as asbestos-containing building materials (ACBM) under applicable federal (EPA) and Montana DEQ regulations.

All confirmed and assumed ACBM are summarized by homogeneous area and functional space in **Table 1**. Full details from the inspection, including laboratory reports and certificates of analysis, are available in **Appendix A**. This report represents a time-specific snapshot of conditions observed during our inspection. Changes in material condition or building use may require re-evaluation.

3.2.1 Confirmed ACM (>1% Asbestos)

Two (2) HAs were confirmed to contain asbestos at concentrations above >1%

- M1.3/S3.3: Drywall System in which the mud layer contains (2% Chrysotile) & the associated lace ceiling texture contains (2% Chrysotile). These materials are currently installed as ceiling covering in room 1.04 & are present above the drop down-ceiling grid.



Non-ACM HAs (38)

Thirty Eight homogeneous areas were confirmed to contain no detectable asbestos mineral fibers.

Laboratory certificates of analysis from Eurofins | CEI Laboratories are provided in Appendix A.1. Photographic documentation of confirmed and assumed ACBM is presented in Appendix D. Locations of confirmed ACBM are depicted in Figure 2.

3.3 LEAD-BASED PAINT

Table 2 provides a comprehensive summary of all suspect lead-containing painted surfaces identified during the current inspections. For each homogeneous area (HA), the table includes material/substrate description, functional space location, representative XRF sample IDs, and the conservative “worst-case” XRF reading (highest value reported for the HA).

A total of **Four (4)** homogeneous areas of painted coatings were evaluated across both inspections. Of these, **Three (2)** were confirmed to contain detectable lead and is classified as lead-containing paint/coatings (LCP >0.10 mg/cm² but <1.0 mg/cm²) or lead-based paint (LBP ≥ 1.0 mg/cm² per HUD criterion).

3.3.1 Confirmed Lead-Based Paint (LBP > 1.0 mg/cm²)

One (1) HA was confirmed to meet or exceed the HUD/EPA criterion for lead-based paint:

- **P.4:** Red paint applied to the original wood Tongue and groove flooring, throughout the offices section (offices, corridors, common rooms) on the main/2nd levels. This HA contains 2.6 mg of lead per one square centimeter.
 - **Note:** New floor coverings have been installed over the P.4 with glue/adhesives any attempt to remove the overlying floor coverings will disturb P.4 and potentially create a hazardous lead dust.

3.3.2 Confirmed Lead-Containing Paint (LCP ≥ 0.10 mg/cm² but <1.0 mg/cm²)

Two (2) HAs were confirmed to contain detectable lead but below the LBP threshold:

- **P.2:** Peach top coat over beige/white base coat (0.2 mg/cm²) on the original plaster wall/ceiling coverings throughout the offices, corridors, common rooms on the main/2nd levels.
- **P.3:** White to coat with maroon base coat (0.7 mg/cm²), applied to the textile wall coverings in rooms 1.09, 1.03, 1.02, 2.03.



3.3.3 Cross-Contaminated HAs

Several building materials within the project area were observed to have visible paint residue or are suspected of being cross-contaminated with lead dust or adhered lead paint chips from adjacent deteriorated or previously disturbed lead-containing coatings. This contamination occurred through overspray during original painting, settling of lead dust from peeling or damaged surfaces, or tracking during past renovation or maintenance activities.

While these materials are not classified as lead-based paint or lead-containing paint themselves, disturbance of these surfaces has the potential to generate lead dust. Any work involving these cross-contaminated materials should be performed using lead-safe work practices in accordance with the EPA Renovation, Repair and Painting (RRP) Rule (40 CFR Part 745) and the OSHA Lead in Construction Standard (29 CFR 1926.62). This includes the use of wet methods, containment, HEPA filtration, proper cleaning, and post-work verification as appropriate. Specific locations and details are noted in Table 2 and Figure 3.

Building Materials Cross Contaminated by confirmed LCP

- **Source: P.4 (Red Top Coat):** Overlying floor coverings (rolled carpeting, wood underlayment's,) have been directly installed over the paint and are adhered to the paint with adhesives. Removal of the overlying floor covings may result in the creation of a lead dust hazard.

Non-Detectable Paint HA1 (3)

A complete set of XRF instrument readings is provided in Appendix A. XRF sample locations are depicted in Figure 1, and locations of confirmed LCP/LBP are shown in Figure 3. Photographic documentation of confirmed (and assumed) LCP/LBP is presented in Appendix D.

3.4 RCRA RULE OF THUMB

To evaluate the potential for lead-containing painted components and substrates to classify the anticipated demolition or renovation waste stream as hazardous under RCRA for the toxicity characteristic D008 (leachable lead ≥ 5.0 mg/L per TCLP, 40 CFR 261.24), a conservative rule-of-thumb screening was performed.

This screening estimates the building-wide weighted average total lead concentration in the composite waste stream using field XRF measurements of paint films, estimated paint thickness, substrate densities, and professional estimates of each material's proportional contribution to the total waste mass (based on the building survey and typical demolition profiles).

The weighted average total lead concentration for painted homogeneous areas and their respective substrates was calculated at **0.4 mg/kg**. This value is below the RCRA rule-of-thumb threshold of 100 mg/kg total lead and indicates the composite waste stream is unlikely to exhibit the D008 characteristic.



Detailed calculations, including individual material lead concentrations, waste stream weighting, and assumptions, are presented in Table 5.

This screening is conservative and intended for planning purposes only. Final waste classification must be based on representative composite sampling and TCLP analysis as required under RCRA and applicable state regulations. If waste management practices or composition change, re-evaluation is recommended.

4.0

CONCLUSIONS & RECOMMENDATIONS

GEM presents the following conclusions and recommendations based on our interpretation of laboratory results from samples collected on 05.20.26 by Mr. Christopher Casas from the Missoula Youth Court located at 300 Woody Ave. in Missoula MT, Missoula, MT. 59801.

Based on the findings presented in this report and in consideration of applicable environmental regulations (including EPA, and Montana DEQ requirements) and worker protection standards (including OSHA) GEM offers the following recommendations for the identified materials of concern. These recommendations are intended to guide safe management, renovation, demolition, or ongoing operations and maintenance (O&M) activities within the structure.

4.1 ASBESTOS & LEAD

The inspection identified confirmed asbestos-containing materials (ACBM $\geq 1\%$ asbestos) and lead-containing paint/coatings (LCP/LBP) throughout the project area.

Before any renovation, demolition, or other construction activities that could disturb the identified asbestos-containing materials (ACM) — including all Regulated Asbestos-Containing Materials (RACM) and any building materials with detectable asbestos fibers — GEM strongly recommends complete removal, transportation, and off-site disposal of these materials. This work must be performed in full compliance with applicable U.S. EPA, Montana DEQ, and OSHA asbestos regulations to prevent fiber release, human exposure, and environmental contamination

For any future disturbance of identified ACM or LCP (e.g., during maintenance, repair, or renovation), compliance with applicable regulations is required:

Asbestos: All confirmed asbestos-containing materials (ACBM) and materials presumed to be asbestos-containing must be removed prior to renovation or demolition activities. Abatement work must be performed by Montana DEQ-accredited asbestos abatement contractors in full compliance with:

- EPA National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 61, Subpart M),
- Montana DEQ regulations (ARM 17.74),
- OSHA Construction Asbestos Standard (29 CFR 1926.1101).
- Requirements include project notification (as applicable), competent person oversight, wet methods, negative pressure containment (for friable and high-risk materials), proper waste handling and disposal as asbestos-containing waste, and post-abatement clearance verification (visual inspection + aggressive air sampling).

Lead: All disturbance of lead-containing paint/coatings (LCP/LBP) must be performed by personnel meeting EPA/OSHA requirements. This includes either

- EPA RRP Rule (40 CFR Part 745) requires certified renovators, lead-safe work practices, containment, and cleanup verification. Or
- EPA-certified Lead Abatement Supervisors and works when full lead abatement (removal) is performed under 40 CFR Part 745, Subpart L.



- OSHA Lead in Construction (29 CFR 1926.62) requires exposure assessment, controls, PPE, and medical surveillance unless a negative exposure assessment is documented.

Waste: Debris containing ACM is special waste in Montana; lead-containing waste is hazardous (D008) if TCLP ≥ 5.0 mg/L (40 CFR 261.24). A conservative screening estimated weighted average total lead below the 100 mg/kg rule-of-thumb threshold — indicating low likelihood of D008 classification. Final waste classification must be based on representative composite sampling and TCLP analysis as required under RCRA.

4.2 RECOMMENDATIONS

Concerning potential future construction activities, the most effective approach to regulatory compliance regarding asbestos handling, transport, and disposal is often to remove all RACM, non-friable asbestos-containing materials (ACM), and asbestos-contaminated materials before general construction activities begin. This strategy significantly reduces the risk of asbestos exposure for construction workers and future building occupants. Additionally, since construction waste with any detectable asbestos must be treated as "asbestos special waste" per Montana solid waste rules, this upfront removal can lower overall disposal costs.

GEM recommends that all asbestos abatement, repair, encapsulation, transportation, and disposal activities be performed by a properly accredited and licensed asbestos abatement contractor. This helps ensure full compliance with EPA and OSHA requirements and minimizes potential liability and exposure risks to workers, building occupants, the community, and the environment.

Even when a Montana DEQ demolition/renovation permit is not required, GEM generally recommends independent post-abatement clearance monitoring (visual inspection + aggressive air sampling) to document that the work area has met minimum criteria for unrestricted re-occupancy, and all target materials including any dust/debris generated by abatement have been satisfactorily removed.

Conditions documented in this report represent a time-specific snapshot. Changes in material condition or building use may require re-evaluation.

GEM is available to assist with implementation of these recommendations, including O&M program development, abatement specifications and bid solicitation, project oversight, waste characterization, and clearance verification. Additional services can be provided under separate agreement.

5.1 LIMITATIONS

This asbestos and lead-containing paint (LCP) inspection report, including the RCRA lead waste screening evaluation, was prepared based on information gathered during the site visit, communications with the client, review of provided documents, field observations, XRF testing, bulk sampling, and interpretation of laboratory analytical results.

The inspection was limited to readily and safely accessible portions of the project area and was non-destructive in nature. Concealed materials (e.g., within wall cavities, above fixed ceilings, behind overlays, or in underground piping) were not assessed and may contain asbestos or lead not identified in this report. Supplemental inspection, sampling, and analysis may be required if previously inaccessible areas or materials are exposed during renovation, demolition, or if the project scope expands to include additional structures, areas, or components.

The RCRA rule-of-thumb screening for total lead is a conservative planning tool based on field XRF data, estimated paint thickness, substrate densities, and professional judgment regarding waste stream composition. It is not a substitute for definitive waste classification, which requires representative composite sampling and Toxicity Characteristic Leaching Procedure (TCLP) analysis per 40 CFR Part 261.

Conditions documented represent a time-specific snapshot as observed on the inspection date. Changes in material condition, building use, or disturbance prior to planned activities may necessitate re-evaluation.

GEM appreciates the opportunity to provide these services. If you have questions regarding this report or require additional assistance, please contact us at 406-370-4139. We look forward to working with you on future projects.

5.2 STATEMENT OF INSPECTION

GEM Environmental, Inc. certifies that the asbestos-containing materials (ACM) and lead-containing paint (LCP) inspection of the project area was conducted in accordance with applicable federal and Montana state requirements, including AHERA inspection protocols (40 CFR Part 763, Subpart E), NESHAP (40 CFR Part 61, Subpart M), HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Revision), OSHA Lead in Construction Standard (29 CFR 1926.62), and Montana Administrative Rules (ARM 17.74.354).

All reasonable professional efforts were made to identify and assess readily accessible suspect materials using current industry-standard practices. Sampling, analysis, XRF testing, condition assessment, and reporting were performed in conformance with these standards.

The findings, conclusions, and recommendations presented in this report are based on conditions observed during the site visit, laboratory analytical results, field XRF data, and professional judgment. They are provided impartially and without collusion with any other parties associated with the project. To the best of GEM Environmental, Inc.'s knowledge and ability, the information contained herein is accurate and complete as of the inspection date.



This report represents a time-specific snapshot of observed conditions. Changes in material condition, building use, or disturbance may require re-evaluation. Final decisions regarding hazardous materials management remain the responsibility of the client.

Sincerely, GEM Environmental, Inc.

Christopher E. Casas,
Principle Industrial Hygienist

Montana DEQ-Accredited Asbestos Inspector/Management Planner/Project Designer/Contractor-Supervisor EPA/HUD-Accredited Lead Inspector/Risk Assessor/Contractor-Supervisor



- Code of Federal Regulations (CFR)**, Title 29, Part 1910.1001, Asbestos; General Industry Standard; Final Rule, August 24, 2006.
- Code of Federal Regulations (CFR)**, Title 29, Part 1926.1101, Asbestos; Construction Industry Standard; Final Rule, August 24, 2006.
- Code of Federal Regulations (CFR)**, Title 40, Part 763, Asbestos; Asbestos-Containing Materials in Schools; Final Rule, October 30, 1987.
- Code of Federal Regulations (CFR)**, Title 40, Part 61, Subpart M – National Emission Standard for Asbestos; Final Rule, November 20, 1990, revised June 19, 1995.
- Code of Federal Regulations (CFR)**, Title 40, Part 745, Lead; Requirements for Lead-Based Paint Activities in Target Housing and Child Occupied Facilities; Final Rule, August 29, 1996, revised January 5, 2001.
- Code of Federal Regulations (CFR)**, Title 24 Part 35 and Title 40, Part 745, Lead; Requirements for Disclosure of Know Lead-Based Paint and/or Lead-Based Paint Hazards in Housing; Final Rule, March 6, 1996.
- Housing and Community Development Act**, Residential Lead-Based Paint Hazard Reduction Act, Title X, 1992.
- Housing and Urban Development (HUD)**, *Guidelines for the Control of Lead-Based Paint Hazards in Housing*, June 1995, revised 1997 and 2000.



Exhibit A

ASBESTOS, LEAD, RCRA SUMMARY TABLES

Exhibit A

Missoula County
311 Woody Ave. Missoula MT

TABLE 1
SUMMARY OF SUSPECT AND CONFIRMED ACM HOMOGENOUS MATERIALS

HA Number	Layer	Homogenous Area Description	Homogenous Area Location by Functional Space	Quantity	Unit	Non-Friable (NF) or Friable (F)	Percent & Type of Asbestos	In-Place DEQ Category	Anticipated DEQ Category
F6.1	A	Wood Parquet Flooring (A), with yellow cream mastic & white weave.	1.03 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
F8.1	A	Wood fiber board underlayment, associated with F6.1	1.03 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F5.1	A	Light yellow carpet mastic	1.01 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F8.2	A	Fine wood fiber board underlayment, associated with F5.1	1.05 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F5.2	A	Medium Dark yellow carpet mastic, with carpet backing (B)	1.02 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected	Non-ACM	Non-ACM
F8.3	A	Wood fiber board underlayment, associated with F5.2	1.02 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F5.3	A	Yellow carpet backing/mastic	1.05 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F5.4	A	Yellow carpet mastic on wood fiber board unerlayment	1.04 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F8.4	A	Beige wood fiberboard unerlayment. Associated with F5.4	1.04 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F3.1	A	Blue/Grey sheet vinyl flooring (A), with yellow mastic (B)	1.06 (Floor), 1.07 (Floor), 1.08 (Floor)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected	Non-ACM	Non-ACM
F8.5	A	Thin Plywood Underlayment	1.06 (F), 1.07 (F), 1.08 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F4.1	A	Grey vinyl sheet flooring backing only, residual.	1.06 (F), 1.07 (F), 1.08 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM

Exhibit A

TABLE 1
SUMMARY OF SUSPECT AND CONFIRMED ACM HOMOGENOUS MATERIALS

HA Number	Layer	Homogenous Area Description	Homogenous Area Location by Functional Space	Quantity	Unit	Non-Friable (NF) or Friable (F)	Percent & Type of Asbestos	In-Place DEQ Category	Anticipated DEQ Category
F5.5	A	Dark yellow carpet mastic	2.06 (F), 2.01 (F), 2.03 (F), 2.04(F), 2.05 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F5.6	A	Yellow Carpet mastic (A), with white backing Material (A)	1.09 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B	Beige fibrous backing material					None Detected		
F5.7	A	Yellow carpet mastic (A), Beige woven backing (B)	1.09 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected	Non-ACM	Non-ACM
F8.6	A	Thin wood fiberboard underlayment	1.09 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M1.1	A	Drywall System (Joint Compound, Drywall, Tape)	1.09 (W), 1.03 (W), 2.03 (W), 2/04 (W), 2.05 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
	C						None Detected		
M1.1 Note: Installed over walls with no texture, as backing for wood fiber board panels/wall papers									
M1.2	A	Brown wood fiber board wall panels	1.02 (W), 1.09 (W), 1.03 (W), 2.03 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M21.1	A	Wall covering, paper with textile pattern (red/white)	1.02 (W), 1.09 (W), 1.03 (W), 2.03 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M20.1	A	Yellow Mastic, associated with M1.2	1.02 (W), 1.09 (W), 1.03 (W), 2.03 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M5.1	A	2x4 fiberglass ceiling panels with vinyl face covering	1.01 (C), 1.07 (C), 1.09 (C), 1.03 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M5.2	A	2x4 White synthetic ceiling tiles with fissures & pinholes	1.04 (C), 1.06(C), 1.07 (C), 1.08 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM

Exhibit A

TABLE 1
SUMMARY OF SUSPECT AND CONFIRMED ACM HOMOGENOUS MATERIALS

HA Number	Layer	Homogenous Area Description	Homogenous Area Location by Functional Space	Quantity	Unit	Non-Friable (NF) or Friable (F)	Percent & Type of Asbestos	In-Place DEQ Category	Anticipated DEQ Category
M10.1	A	Plaster; Beige surfacing (A), white skim coat (B), grey base coat (C)	1.01 (C&W), 1.02 (C&W), 1.04 (C&W), 1.06 (C&W), 1.07 (C&W), 1.08 (C&W), 1.09 (C&W), 1.03 (C&W), 1.05 (C&W), 2.06 (C&W), 2.02 (C&W), 2.03 (C&W), 2.04 (C&W), 2.05 (C&W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
	C						None Detected		
M1.3	A	Drywall System (Joint Compound (A), Tape (B), Drywall (C))	1.04 (C)	400	SF	N.A.	2% Chrysotile	RACM	RACM
	B						None Detected		
	C						None Detected		
S3.3	A	Lace Texture, associated with M1.3	1.04 (C)			N.A.	2% Chrysotile	RACM	RACM
S4.1	A	Popcorn Ceiling Texture	2.04 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M5.3	A	Thin High density wood fiber board acoustical panels	0.01 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
M1.4	A	Drywall System (Joint Compound (A), Tape (B), Drywall (C))	0.02 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
	C						None Detected		
S3.4	A	Spounded on Texture	0.02 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
R4.1	A	Membrane, brown wood fiberboard (B), black built-up roofing (A)	Exterior: Flat Roof	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
R4.1 Note: following non-detect results by PLM, this HA was further analyzed by TEM Bulk Chatfield Method.									
R5.1	A	Blue asphaltic shingles	Exterior: gable Roof	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM

Exhibit A

TABLE 1
SUMMARY OF SUSPECT AND CONFIRMED ACM HOMOGENOUS MATERIALS

HA Number	Layer	Homogenous Area Description	Homogenous Area Location by Functional Space	Quantity	Unit	Non-Friable (NF) or Friable (F)	Percent & Type of Asbestos	In-Place DEQ Category	Anticipated DEQ Category
R8.1	A	Black tar paper	Exterior: gable roof	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
T10.1	A	White fiberglass insulation, blown in	Attic	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
T5.1	A	White vinyl wrap (A), & yellow fiberglass (B); flex duct	Attic	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
T5.2	A	Grey vinyl wrap (A), with yellow fiberglass (B); flex duct typ. II	Attic	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected	Non-ACM	Non-ACM
M21.2	A	Beige woven paper wall covering	2.05 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
T14.1	A	Aluminum Backed fiberglass batt insulation (C), pink fiberglass (A) , with black adhesive (B)	Attic, & Perimeter wall cavities on 1st & 2nd Floor	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected		
	C						None Detected		
M1.6	A	Tan wood fiberboard panel	2.03 (C), 2.04 (C), 2.06 (C), 2.05 (C)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
F11.1	A	Linoleum, black backing with brown mastic, vinyl surface (beige with brown streaks)	1.09 (F)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM
	B						None Detected	Non-ACM	Non-ACM
S4.2	A	Light broshed on texture (A), with tape (B)	2.01 (W), 2.02 (W), 2.03 (W), 2.06 (W), 2.04 (W), 2.05 (W)	N.A.	N.A.	N.A.	None Detected	Non-ACM	Non-ACM

TABLE 1
SUMMARY OF SUSPECT AND CONFIRMED ACM HOMOGENOUS MATERIALS

HA Number	Layer	Homogenous Area Description	Homogenous Area Location by Functional Space	Quantity	Unit	Non-Friable (NF) or Friable (F)	Percent & Type of Asbestos	In-Place DEQ Category	Anticipated DEQ Category
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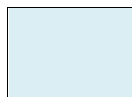
Notes:



Light Orange Shading indicates Laboratory Analysis has confirmed the Material contains more than one percent (1%) Asbestos mineral fibers & is therefore ACM.



Light purple shading indicates the material is cross contaminated by confirmed Asbestos-containing material.



Light blue Shading indicates the material contains a detectable quantity of asbestos mineral fibers.

1. The locations of identified asbestos-containing materials (ACM) are described by functional space and are based on approximate room designations assigned in the field. These designations were documented on hand-drawn floor-plan sketches prepared by GEM during the site inspection.
2. The Quantity of ACM is a estimate based from our site inspection, the reported amount will vary the actual quantities by +/- 15%. The associated units are as follows; LF = Linear Feet, SF= Square Feet, EA = Each
3. The Percentage of asbestos is reported based on PLM analysis using the EPA Method 600/R-93/116, and is a visual estimation based on the experience and training of the Microscopist. If necessary additional analysis was completed on select samples with reported initial visual estimation below 1% asbestos mineral fibers with appropriate preparation techniques for point count analysis.
4. The Montana Department of Environmental Quality (DEQ) categories listed in the table are assigned in accordance with DEQ and NESHAP definitions for Category I Non-Friable ACM, Category II Non-Friable ACM, and Regulated Asbestos-Containing Material (RACM/Friable ACM), as detailed in the attached report.
 - (A) Friable/Non-Friable Column: Indicates the physical condition of the material (friable or non-friable) as observed at the time of GEM's inspection.
 - (B) DEQ Category Column: Reflects the current, in-place regulatory classification of the material.
 - (C) Anticipated DEQ Category Column: Represents the expected DEQ/NESHAP classification of the material during typical demolition or renovation activities when specialized asbestos abatement methods are not employed (i.e., the category the material is likely to become once subjected to normal demolition forces).

Exhibit A

Missoula County
311 Woody Ave. Missoula MT

Table 2

Summary of Homogeneous Areas of Suspect Lead-Based Paint

HA Number	Homogeneous Area Description	Homogeneous Area Locations	Quantity	Unit	XRF Shots	Lead Reading	Classification
P.1	Peach top coat with beige/white base coat; on plaster	1.01, 1.02,. 1.04, 1.05, 1.03, 1.09, 1.07, 1.06, 2.01, 2.02, 2.07, 2.08, 2.03, 2.06, 2.05, 2.04	8100	SF	5605-5608 (4)	0.2	LCP
P.2	Light varnish on wood tounge & groove wall coverings	1.01, 1.02,. 1.04, 1.05, 1.03, 1.09, 1.07, 1.06, 2.01, 2.02, 2.07, 2.08, 2.03, 2.06, 2.05, 2.04	N.A.	N.A.	5609-5611 (3)	0	Non-LCP
P.3	White top coat with maroon base coat; on textile wall covering/gypsum board	1.09, 1.03, 1.02, 2.03	1850	SF	5612-5616 (5)	0.7	LCP
P.4	Red top coat over original wood tounge and groove flooring,	1.01, 1.02,. 1.04, 1.05, 1.03, 1.09, 1.07, 1.06, 2.01, 2.02, 2.07, 2.08, 2.03, 2.06, 2.05, 2.04	3000	SF	5617-5620 (4)	2.6	LBP

Summary of Homogeneous Areas of Suspect Lead-Based Paint

HA Number	Homogeneous Area Description	Homogeneous Area Locations	Quantity	Unit	XRF Shots	Lead Reading	Classification
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Notes

1. The locations of identified lead-containing or lead-based paint are described by functional space and are based on approximate room designations assigned in the field. These designations were documented on hand-drawn floor-plan sketches prepared by GEM during the site inspection.
2. The listed Quantity for Lead-Containing Material is a estimate made during our inspection, & will be within 15% of the actual quantity. The Quantity is provided in units as follows; LF= Linear Feet, SF= Square Feet, EA = Each
3. **LEAD CONCENTRATION REPORTING:** Lead concentrations are reported in milligrams of lead per square centimeter (mg/cm²) of surface area, as determined by X-ray fluorescence (XRF) analysis or laboratory testing.
For each homogeneous area (HA) of paint, multiple readings or samples were collected. The highest detected lead concentration from that HA is reported in the table to represent the worst-case scenario for the painted surface. This conservative approach ensures that all applicable regulatory and safety requirements are based on the most protective (highest) result.

4. LEAD-CONTAINING PAINT IDENTIFICATION: Blue shading in the table indicates that lead was detected in a representative sample from the listed material location, but at a concentration below the U.S. EPA threshold of ≥ 1.0 mg/cm² that defines lead-based paint.0

(A) Although these materials do not meet the federal definition of lead-based paint, they are classified as Lead-Containing Paint (LCP) because lead is present at detectable levels.

(B) Any disturbance of these materials may generate lead dust and create an exposure hazard. Accordingly, all renovation, repair, demolition, or maintenance activities involving these materials must be performed in full compliance with the OSHA Lead in Construction Standard (29 CFR 1926.62)

:

Summary of Homogeneous Areas of Suspect Lead-Based Paint

HA Number	Homogeneous Area Description	Homogeneous Area Locations	Quantity	Unit	XRF Shots	Lead Reading	Classification
	5. LEAD-BASED PAINT IDENTIFICATION: Orange shading in the table indicates that the analyzed lead concentration from a representative sample collected at that material location exceeds the U.S. EPA threshold of ≥ 1.0 mg/cm², which defines the material as lead-based paint (LBP) under federal standards (A) Disturbance of these materials has the potential to generate lead dust and create an exposure hazard. Accordingly, any renovation, repair, or demolition activities involving these materials must be conducted in full compliance with applicable OSHA Lead in Construction regulations (29 CFR 1926.62) and, where applicable, EPA Renovation, Repair, and Painting (RRP) Rule requirements						

Exhibit A

TABLE 3.
SUMMARY OF RCRA RULE OF THUMB

Material Type	XRF Reading (mg/cm²)	Assumed Paint Thickness (µm)	Paint Mass per cm² (mg/cm²)	Substrate Mass per cm² (mg/cm²)	Total Mass per cm² (mg/cm²)	Total Pb in Piece (mg/kg)	Estimated Surface Area (m²)	Total Material Mass (kg)	% of Total Waste Mass	Weighted Pb Contribution (mg/kg)	
Painted Structural Steel	0	150	22.5	5000	5022.5	0	500	25112.5	0.15	0	
Painted Steel, lift support	0	150	22.5	5000	5022.5	0	500	25112.5	0.05	0	
Painted Concrete/CMU	0	100	15	3000	3015	0	800	24120	0.3	0	
Painted Plywood (1/2")	0	125	18.75	65	83.75	0	175	146.5625	0.1	0	
Paint Chips/Blast Media	1	300	45	5	50	20	10	5	0.1	2	
Painted Gypsum Board (Drywall)	0	100	15	40	55	0	1200	650	0.05	0	
Transite Panel	0	100	15	2000	2015	0	200	4030	0	0	
Painted Wood Trim (textured)	0	150	22.5	80	102.5	0	10	10.25	0.1	0	
Painted Radiators	0	100	15	6000	6015	0	50	3007.5	0.1	0	
Exterior Stucco (textured)	0	200	30	2500	2530	0	400	10120	0	0	
Painted Dimensional Lumber (flooring)	2.6	150	20	100	100	26	15	15	0.05	1.3	
Glazed Ceramic Tile (lead glaze)	0	50	7.5	8000	8007.5	0	150	12011.25	0	0	
Total Waste Mass (kg)									104340.5625	Weighted Average Pb (mg/kg)	3.3

1. TOTAL LEAD CONCENTRATION IN INDIVIDUAL MATERIAL (Ci) -- Dilution Formula : $C_i = (\text{XRF Reading} \times 1000) / (\text{Paint Mass per cm}^2 + \text{Substrate Mass per cm}^2)$

Where: Ci = Total lead concentration in the painted material (mg/kg), XRF Reading = Average/highest field XRF value for the homogeneous area (mg Pb/cm²), Paint Mass per cm² = Estimated paint thickness (μm) × 0.15 mg/μm/cm² (industry rule-of-thumb density factor), Substrate Mass per cm² = Estimated mass of substrate (e.g., steel ≈ 5000 mg/cm², drywall ≈ 40 mg/cm²), 1000 = Conversion factor (mg/cm² to mg/mg for mg/kg equivalent)

2. Proportional Contribution of Each Material to Total Waste Stream (fi) $f_i = (\text{Estimated \% Contribution of Material } i) / 100$ OR (if using mass): $f_i = (\text{Total Mass of Material } i) / (\text{Total Mass of All Materials in Waste Stream})$ Where: fi = Fraction of total waste mass contributed by material i (decimal, sum of all fi = 1.0)

% Contribution = Professional estimate based on building survey, material quantities, and typical demolition waste profiles

3. Building-Wide Weighted Average Total Lead Concentration (C_{total waste})

$C_{\text{total waste}} = \sum (C_i \times f_i)$ for all painted materials Where: C_{total waste} = Estimated total lead concentration in the composite waste stream (mg/kg) Σ = Sum over all materials Interpretation (Rule-of-Thumb Threshold): If C_{total waste} < 100 mg/kg → Unlikely to exhibit RCRA D008 characteristic (TCLP ≥ 5.0 mg/L leachable lead).

If C_{total waste} ≥ 100 mg/kg → Recommend composite sampling and TCLP analysis for definitive classification.



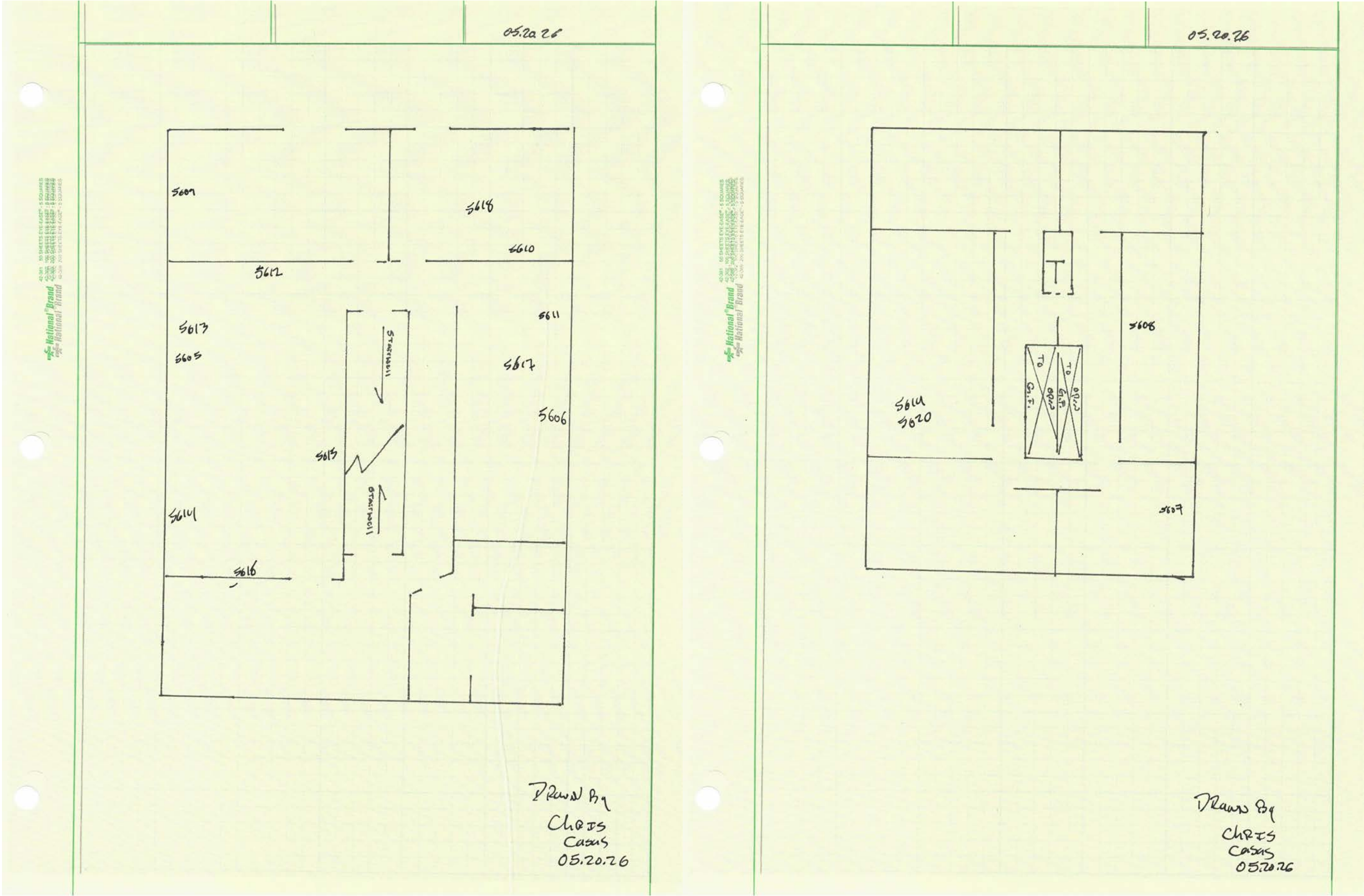
Exhibit A

ASBESTOS & LEAD FIGURES

MAIN LEVEL

2ND FLOOR

BASEMENT, ATTIC, ROOF



Project Number: 26-103

Sheet Number: NO 1

Drawn by: Christopher E. Casas

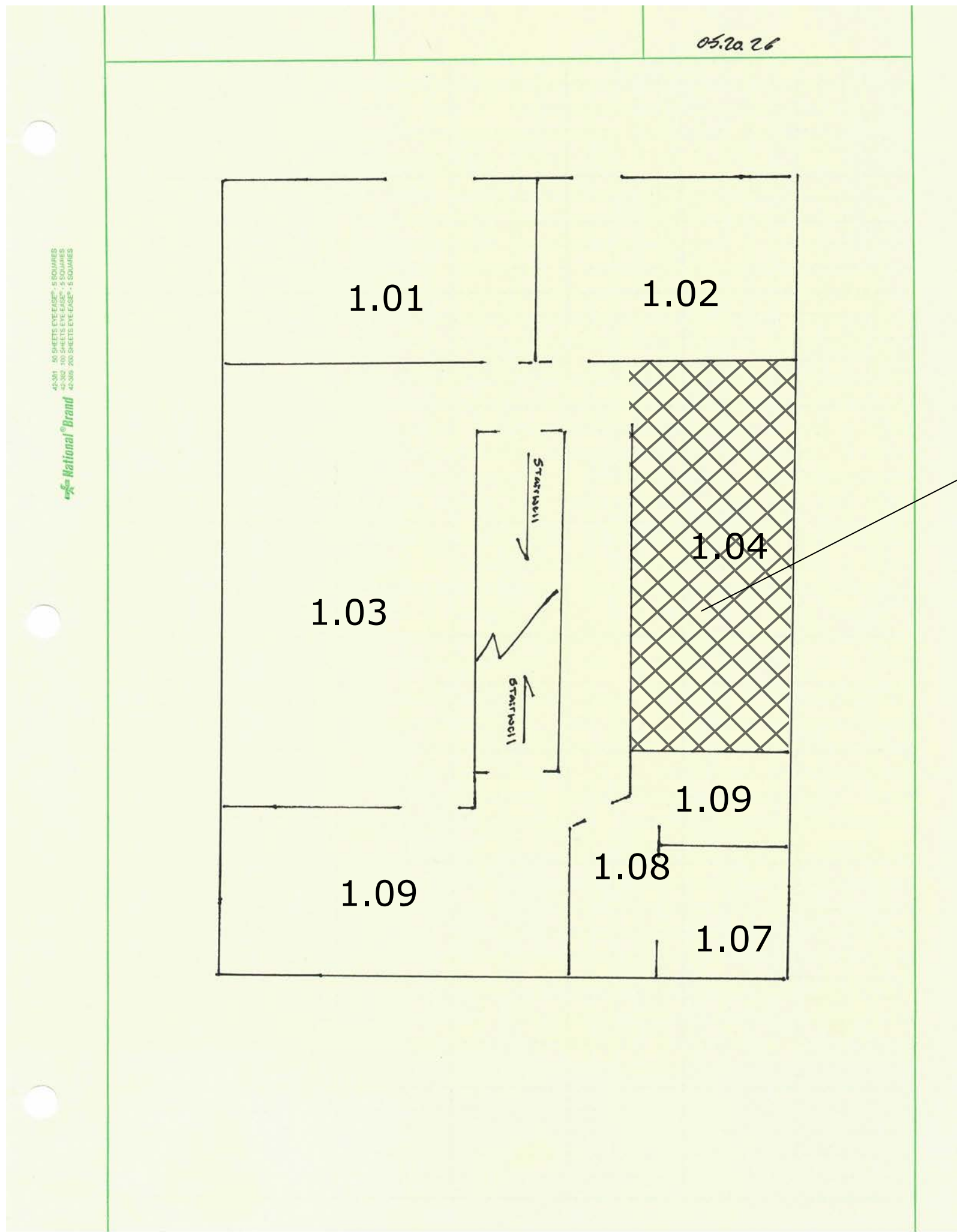
MISSOULA COUNTY
311 WOODY AVE. MISSOULA MT

XRF SAMPLE LOCATIONS

GEM ENVIRONMENTAL, INC.

PO Box 9053 • Missoula, MT 59807

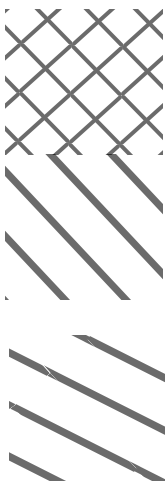




LEGEND ASBESTOS-CONTAINING MATERIAL LOCATIONS

Figure 2: Locations of Confirmed and Suspect Asbestos-Containing Materials Technical building plan showing functional spaces with confirmed and assumed ACM present (cross-hatched patterns). Numbered labels correspond to homogeneous area (HA) IDs in Table 1 (suspect and confirmed materials summary). Number color indicates current observed condition and disturbance potential (see legend below). × indicates cross-contaminated homogeneous areas (special handling required). Full details, including condition assessment, disturbance potential, regulatory category, and recommended response actions, are provided in Table 1.

Legend:
Cross-hatch patterns indicate functional space groups with ACM present:
Dense double cross-hatch = High-risk / Friable ACM (RACM)
Single diagonal hatch = Category I Non-friable
Vertical lines = Category II Non-friable



DENSE DOUBLE CROSS-HATCH = HIGH RISK/FRIABLE ACM (RACM)

SINGLE DIAGONAL HATCH = CATEGORY I NON-FRIABLE ACM

VERTICAL LINE HATCH - CATEGORY II NON-FRIABLE

Number color = Condition / Disturbance Risk (detailed in Table 3):
Red = Poor condition / High priority (immediate abatement recommended)
Yellow = Fair condition / Medium priority (repair or encapsulation at renovation)
Green = Good/Intact condition / Low priority (ongoing O&M program)

× = Cross-contaminated HA (by ACM Dust)
Numbers correspond to HA IDs in Table 1.

Legend:
Numbered labels correspond to HA IDs in Table 1

1 M1.3/S3.3: Drywall System in which the mud layer contains (2% Chrysotile) & the associated lace ceiling texture contains (2% Chrysotile). These materials are currently installed as ceiling covering in room 1.04 & are present above the drop down-ceiling grid.

Project Number: 26-103
Sheet Number: NO 3
Drawn by: Christopher E. Casas

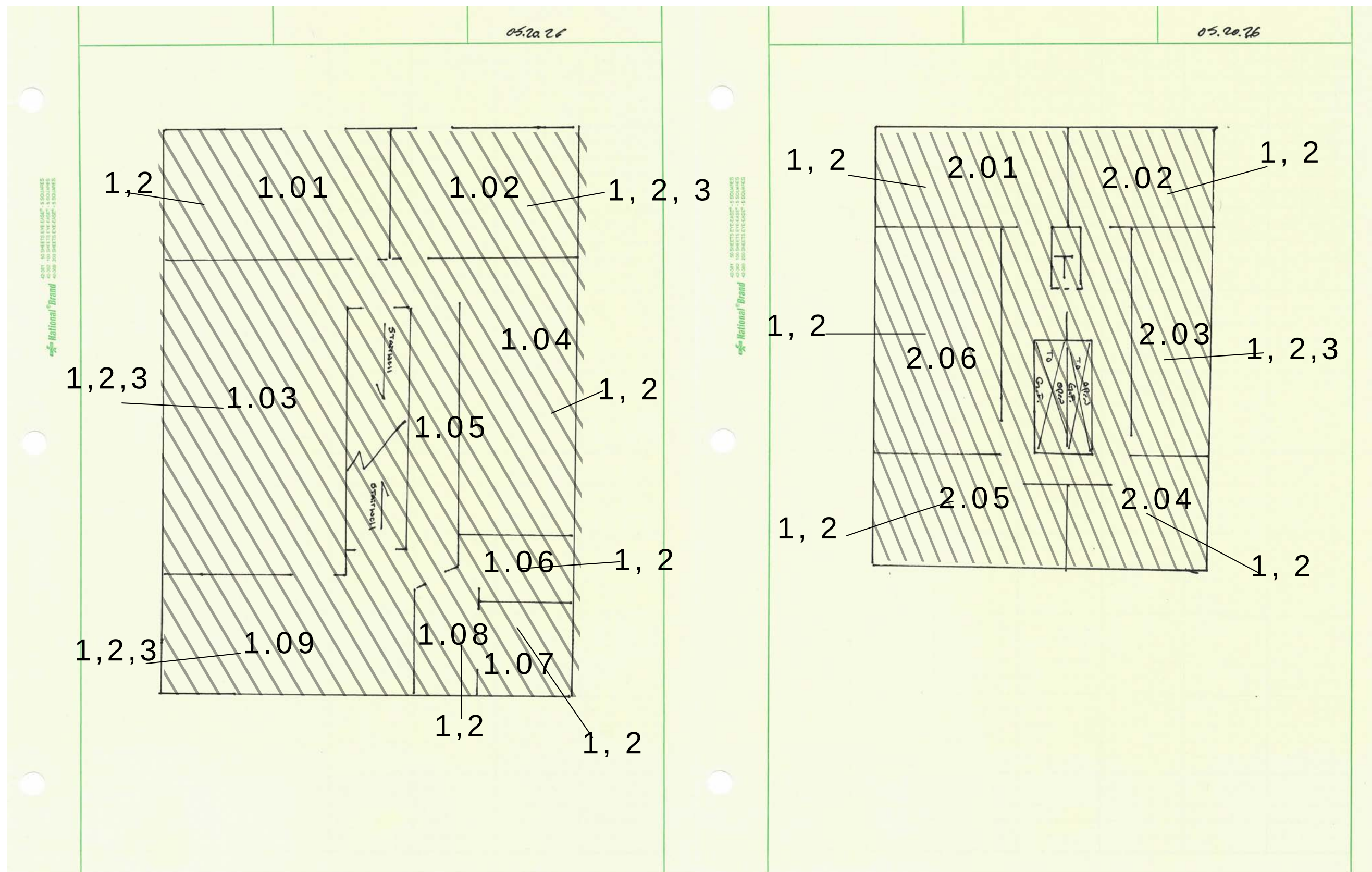
Missoula County Youth Court-
300 Eddy Ave. Missoula

ASBESTOS-CONTAINING MATERIAL LOCATION DRAWINGS

GEM ENVIRONMENTAL, INC.

PO Box 9053 • Missoula, MT 59807





LEGEND LEAD-BASED PAINT LOCATIONS

Figure 3: Locations of Confirmed Lead-Containing Paint/Coatings Technical building plan showing functional spaces with confirmed and suspect lead-containing paint/coatings (LCP/LBP) present (cross-hatched patterns). Numbered labels correspond to homogeneous area (HA) IDs in Table 2 (suspect and confirmed painted surfaces summary). Number color indicates current observed condition and disturbance potential (see legend below). x indicates cross-contaminated or high-risk painted areas (special handling required). Full details, including condition assessment, disturbance potential, and recommended response actions, are provided in Table 4.

Legend:
Cross-hatch patterns indicate functional space groups with LCP/LBP present:
Dense double cross-hatch = High-risk / Deteriorated areas
Single diagonal hatch = Category I Non-Friable (e.g., intact coatings)
Vertical lines = Category II Non-Friable (e.g., brittle or cementitious)



DENSE DOUBLE CROSS-HATCH = HIGH RISK / DETERIORATED



SINGLE DIAGONAL HATCH = CATEGORY I NON-FRIABLE
(E.G. INTACT COATING)



VERTICAL LINE HATCH - CATEGORY II NON-FRIABLE
(E.G. BRITTLE OR CEMENTITIOUS)

Number color = Condition / Disturbance Risk (detailed in Table 4):
Red = Poor condition / High priority (immediate or delayed abatement during next renovation recommended)
Yellow = Fair condition / Medium priority (repair or encapsulation at renovation)
Green = Good/Intact condition / Low priority (ongoing O&M program)

x = Cross-contaminated or high-risk HA (special handling required)
Numbers correspond to HA IDs in Table 2.

Legend:
Numbered labels correspond to HA IDs in Table 2

- P.4:** Red paint applied to the original wood Tongue and groove flooring, throughout the offices section (offices, corridors, common rooms) on the main/2nd levels. This HA contains 2.6 mg of lead per one square centimeter.
 - Note:** New floor coverings have been installed over the P.4 with glue/adhesives any attempt to remove the overlying floor coverings will disturb P.4 and potentially create a hazardous lead dust.
- P.2:** Peach top coat over beige/white base coat (0.2 mg/cm²) on the original plaster wall/ceiling coverings throughout the offices, corridors, common rooms on the main/2nd levels.
- P.3:** White to coat with maroon base coat (0.7 mg/cm²), applied to the textile wall coverings in rooms 1.09, 1.03, 1.02, 2.03.

Project Number: 26-004
Sheet Number: NO 3
Drawn by: Christopher E. Casas

MISSOULA YOUTH COURT -
311 WOODY AVE. MISSOULA, MT

LEAD-BASED PAINT/LEAD-CONTAINING PAINT LOCATION DRAWINGS.

GEM ENVIRONMENTAL, INC.

PO Box 9053 • Missoula, MT 59807





Exhibit A

APPENDIX A.1 CERTIFICATES OF ANALYSIS



June 02, 2026

Chris Casas
GEM Environmental
P.O. Box 9053
Missoula, MT 59807

CLIENT PROJECT: Missoula County - 311 Woody St Missoula MT.
LAB CODE: 753434-1

Dear Chris,

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on 05/26/26. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials and EPA 40 CFR Appendix E to Subpart E of Part 763: Interim Method of the Determination of Asbestos in Bulk Insulation Samples.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% by calibrated visual estimate.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,

A handwritten signature in blue ink that reads "Kamila Reichert".

Kamila Reichert,
Laboratory Director

NVLAP 101768-0



ASBESTOS ANALYTICAL REPORT

By: Polarized Light Microscopy

Prepared for

GEM Environmental

CLIENT PROJECT:	Missoula County - 311 Woody St Missoula MT.
LAB CODE:	753434-1
TEST METHOD:	EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763
REPORT DATE:	06/02/26
TOTAL SAMPLES ANALYZED:	134
# SAMPLES >1% ASBESTOS:	4
TOTAL LAYERS ANALYZED:	183



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
F6.1A	4473406		Brown wood flooring	None Detected
F6.1A (2)	4486526		Cream mastic	None Detected
F6.1B	4473407		Brown wood flooring	None Detected
F6.1B (2)	4486530		Cream mastic	None Detected
F6.1C	4473408		Brown wood flooring	None Detected
F6.1C (2)	4486531		Cream mastic	None Detected
F8.1A	4473409		Tan wood fiberboard underlayment	None Detected
F8.1B	4473410		Tan wood fiberboard underlayment	None Detected
F8.1C	4473411		Tan wood fiberboard underlayment	None Detected
F5.1A	4473412		Yellow mastic	None Detected
F5.1B	4473413		Yellow mastic	None Detected
F5.1C	4473414		Yellow mastic	None Detected
F8.2A	4473415		Tan wood fiberboard underlayment	None Detected
F8.2B	4473416		Tan wood fiberboard underlayment	None Detected
F8.2C	4473417		Tan wood fiberboard underlayment	None Detected
F5.2A	4473418	Layer A	Dark-yellow carpet mastic	None Detected
		Layer B	Beige carpet woven backing material	None Detected
F5.2B	4473419	Layer A	Dark-yellow carpet mastic	None Detected
		Layer B	Beige carpet woven backing material	None Detected
F5.2C	4473420	Layer A	Dark-yellow carpet mastic	None Detected
		Layer B	Beige carpet woven backing material	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
F8.3A	4473421		Beige wood fiberboard underlayment	None Detected
F8.3B	4473422		Beige wood fiberboard underlayment	None Detected
F8.3C	4473423		Beige wood fiberboard underlayment	None Detected
F5.3A	4473424		Yellow carpet backing material	None Detected
F5.3B	4473425		Yellow carpet backing material	None Detected
F5.3C	4473426		Yellow carpet backing material	None Detected
F5.4A	4473427		Yellow/tan carpet mastic	None Detected
F5.4B	4473428		Yellow/tan carpet mastic	None Detected
F5.4C	4473429		Yellow/tan carpet mastic	None Detected
F8.4A	4473430		Beige wood fiberboard underlayment	None Detected
F8.4B	4473431		Beige wood fiberboard underlayment	None Detected
F8.4C	4473432		Beige wood fiberboard underlayment	None Detected
F3.1A	4473433		Blue/gray sheet vinyl flooring	None Detected
F3.1A (2)	4486951		Yellow mastic	None Detected
F3.1B	4473434		Blue/gray sheet vinyl flooring	None Detected
F3.1B (2)	4486954		Yellow mastic	None Detected
F3.1C	4473435		Blue/gray sheet vinyl flooring	None Detected
F3.1C (2)	4486970		Yellow mastic	None Detected
F8.5A	4473436		Beige wood underlayment	None Detected
F8.5B	4473437		Beige wood underlayment	None Detected
F8.5C	4473438		Beige wood underlayment	None Detected
F4.1A	4473439		Gray/beige fibrous backing material	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
F4.1B	4473440		Gray/beige fibrous backing material	None Detected
F4.1C	4473441		Gray/beige fibrous backing material	None Detected
F5.5A	4473442		Dark-yellow carpet mastic	None Detected
F5.5B	4473443		Dark-yellow carpet mastic	None Detected
F5.5C	4473444		Dark-yellow carpet mastic	None Detected
F5.6A	4473445	Layer A	Yellow carpet mastic w/ fibrous woven material	None Detected
		Layer B	Beige fibrous backing material	None Detected
F5.6B	4473446	Layer A	Yellow carpet mastic w/ fibrous woven material	None Detected
		Layer B	Beige fibrous backing material	None Detected
F5.6C	4473447	Layer A	Yellow carpet mastic w/ fibrous woven material	None Detected
		Layer B	Beige fibrous backing material	None Detected
F5.7A	4473448	Layer A	Yellow carpet mastic	None Detected
		Layer B	Beige woven underlayment	None Detected
F5.7B	4473449	Layer A	Yellow carpet mastic	None Detected
		Layer B	Beige woven underlayment	None Detected
F5.7C	4473450	Layer A	Yellow carpet mastic	None Detected
		Layer B	Beige woven underlayment	None Detected
F8.6A	4473451		Tan wood fiberboard	None Detected
F8.6B	4473452		Tan wood fiberboard	None Detected
F8.6C	4473453		Tan wood fiberboard	None Detected
M1.1A	4473454	Layer A	Off-white joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
M1.1B	4473455	Layer A	Off-white joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
M1.1C	4473456	Layer A	Off-white joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
M1.2A	4473457		Brown wood fiberboard wall panel	None Detected
M1.2B	4473458		Brown wood fiberboard wall panel	None Detected
M1.2C	4473459		Brown wood fiberboard wall panel	None Detected
M21.11A	4473460		Red wall covering	None Detected
M21.11B	4473461		Red wall covering	None Detected
M21.11C	4473462		White wall covering	None Detected
M20.1A	4473463		Yellow mastic	None Detected
M20.1B	4473464		Yellow mastic	None Detected
M20.1C	4473465		Yellow mastic	None Detected
M5.1A	4473466		White/yellow ceiling panel	None Detected
M5.1B	4473467		White/yellow ceiling panel	None Detected
M5.1C	4473468		White/yellow ceiling panel	None Detected
M5.2A	4473469		Beige ceiling tile	None Detected
M5.2B	4473470		Beige ceiling tile	None Detected
M5.2C	4473471		Beige ceiling tile	None Detected
M10.1A	4473472	Layer A	Beige surface material	None Detected
		Layer B	White plaster skim coat	None Detected
		Layer C	Gray plaster base coat	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
M10.1B	4473473	Layer A	Beige tape	None Detected
		Layer B	White plaster skim coat	None Detected
		Layer C	Gray plaster base coat	None Detected
M10.1C	4473474	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
M10.1D	4473475	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
M10.1E	4473476	Layer A	Beige surface material	None Detected
		Layer B	White plaster skim coat	None Detected
		Layer C	Gray plaster base coat	None Detected
M1.3A	4473477	Layer A	Off-white/blue joint compound	Chrysotile 2%
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
M1.3B	4473478		Sample Not Analyzed per Client Request	
M1.3C	4473479		Sample Not Analyzed per Client Request	
S3.3A	4473480		Off-white texture	Chrysotile 2%
S3.3B	4473481		Off-white texture	Chrysotile 2%
S3.3C	4473482		Off-white texture	Chrysotile 2%
S4.1A	4473483		Beige texture	None Detected
S4.1B	4473484		Beige texture	None Detected
S4.1C	4473485		Beige texture	None Detected
M5.3A	4473486		Brown wood fiberboard panel	None Detected
M5.3B	4473487		Brown wood fiberboard panel	None Detected
M5.3C	4473488		Brown wood fiberboard panel	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
M1.4A	4473489	Layer A	Beige joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
M1.4B	4473490	Layer A	Beige joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
M1.4C	4473491	Layer A	Beige joint compound	None Detected
		Layer B	Beige tape	None Detected
		Layer C	White drywall	None Detected
S3.4A	4473492		Beige texture	None Detected
S3.4B	4473493		Beige texture	None Detected
S3.4C	4473494		No Sample In Bag	
R4.1A	4473495	Layer A	Black built-up roofing	None Detected
		Layer B	Brown wood fiberboard	None Detected
R4.1B	4473496	Layer A	Black built-up roofing	None Detected
		Layer B	Brown wood fiberboard	None Detected
R4.1C	4473497	Layer A	Black built-up roofing	None Detected
		Layer B	Brown wood fiberboard	None Detected
R5.1A	4473498		Black shingle	None Detected
R5.1B	4473499		Black shingle	None Detected
R5.1C	4473500		Black shingle	None Detected
R8.1A	4473501		Black tar paper	None Detected
R8.1B	4473502		Black tar paper	None Detected
R8.1C	4473503		Black tar paper	None Detected
T10.1A	4473504		White glass insulation	None Detected
T10.1B	4473505		White glass insulation	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
T10.1C	4473506		White glass insulation	None Detected
T5.1A	4473507	Layer A	White wrap	None Detected
		Layer B	Pink glass insulation	None Detected
T5.1B	4473508	Layer A	White wrap	None Detected
		Layer B	Pink glass insulation	None Detected
T5.1C	4473509	Layer A	White wrap	None Detected
		Layer B	Pink glass insulation	None Detected
T5.2A	4473510	Layer A	Gray wrap	None Detected
		Layer B	Yellow glass insulation	None Detected
T5.2B	4473511	Layer A	Gray wrap	None Detected
		Layer B	Yellow glass insulation	None Detected
T5.2C	4473512	Layer A	Gray wrap	None Detected
		Layer B	Yellow glass insulation	None Detected
M21.2A	4473513		Beige woven paper wall covering	None Detected
M21.2B	4473514		Beige woven paper wall covering	None Detected
M21.2C	4473515		Beige woven paper wall covering	None Detected
T14.1A	4473516	Layer A	Pink glass insulation	None Detected
		Layer B	Black adhesive	None Detected
		Layer C	Silver/beige wrap	None Detected
T14.1B	4473517	Layer A	Pink glass insulation	None Detected
		Layer B	Black adhesive	None Detected
		Layer C	Silver/beige wrap	None Detected
T14.1C	4473518	Layer A	Pink glass insulation	None Detected
		Layer B	Black adhesive	None Detected
		Layer C	Silver/beige wrap	None Detected
M1.6A	4473519		Tan wood fiberboard panel	None Detected



Built Environment Testing

Asbestos Report Summary

By: Polarized Light Microscopy

Project:
Missoula County - 311 Woody St Missoula MT.

Lab Code: 753434-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
M1.6B	4473520		Tan wood fiberboard panel	None Detected
M1.6C	4473521		Tan wood fiberboard panel	None Detected
F11.1A	4473522		Beige/black sheet vinyl	None Detected
F11.1A (2)	4490105		Brown mastic	None Detected
F11.1B	4473523		Beige/black sheet vinyl	None Detected
F11.1B (2)	4490111		Brown mastic	None Detected
F11.1C	4473524		Beige/black sheet vinyl	None Detected
F11.1C (2)	4490112		Brown mastic	None Detected
M21.3A	4473525		White/beige wallpaper	None Detected
M21.3B	4473526		White/beige wallpaper	None Detected
M21.3C	4473527		White/beige wallpaper	None Detected
S4.2A	4473528		Beige texture w/ tape	None Detected
S4.2B	4473529		Beige texture w/ tape	None Detected
S4.2C	4473530		Beige texture w/ tape	None Detected
M10.1F	4473531	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
M10.1G	4473532	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
M10.1H	4473533	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected

Exhibit A



Built Environment Testing

ASBESTOS BULK ANALYSIS By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F6.1A 4473406	Wood Flooring	Homogeneous Brown Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F6.1A (2) 4486526	Mastic	Homogeneous Cream Non-Fibrous Bound			100%	Mastic	None Detected
F6.1B 4473407	Wood Flooring	Homogeneous Brown Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F6.1B (2) 4486530	Mastic	Homogeneous Cream Non-Fibrous Bound			100%	Mastic	None Detected
F6.1C 4473408	Wood Flooring	Homogeneous Brown Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F6.1C (2) 4486531	Mastic	Homogeneous Cream Non-Fibrous Bound			100%	Mastic	None Detected
F8.1A 4473409	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F8.1B 4473410	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.1C 4473411	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F5.1A 4473412	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
F5.1B 4473413	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
F5.1C 4473414	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
F8.2A 4473415	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.2B 4473416	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F8.2C 4473417	Wood Fiberboard Underlayment	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F5.2A Layer A 4473418	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound			100%	Mastic	None Detected
Layer B 4473418	Carpet Woven Backing Material	Homogeneous Beige Fibrous Loose	100%	Cellulose			None Detected
F5.2B Layer A 4473419	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound			100%	Mastic	None Detected
Layer B 4473419	Carpet Woven Backing Material	Homogeneous Beige Fibrous Loose	100%	Cellulose			None Detected
F5.2C Layer A 4473420	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound			100%	Mastic	None Detected
Layer B 4473420	Carpet Woven Backing Material	Homogeneous Beige Fibrous Loose	100%	Cellulose			None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F8.3A 4473421	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.3B 4473422	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.3C 4473423	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F5.3A 4473424	Carpet Backing Material	Homogeneous Yellow Non-Fibrous Bound			100%	Binder	None Detected
F5.3B 4473425	Carpet Backing Material	Homogeneous Yellow Non-Fibrous Bound			100%	Binder	None Detected
F5.3C 4473426	Carpet Backing Material	Homogeneous Yellow Non-Fibrous Bound			100%	Binder	None Detected
F5.4A 4473427	Carpet Mastic	Homogeneous Yellow/tan Non-Fibrous Bound			100%	Mastic	None Detected



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Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F5.4B 4473428	Carpet Mastic	Homogeneous Yellow/tan Non-Fibrous Bound		100%	Mastic		None Detected
F5.4C 4473429	Carpet Mastic	Homogeneous Yellow/tan Non-Fibrous Bound		100%	Mastic		None Detected
F8.4A 4473430	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.4B 4473431	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.4C 4473432	Wood Fiberboard Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F3.1A 4473433	Sheet Vinyl Flooring	Homogeneous Blue/gray Fibrous Bound	50%	Cellulose	50%	Vinyl	None Detected
F3.1A (2) 4486951	Mastic	Homogeneous Yellow Non-Fibrous Bound		100%	Mastic		None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F3.1B 4473434	Sheet Vinyl Flooring	Homogeneous Blue/gray Fibrous Bound	50%	Cellulose	50%	Vinyl	None Detected
F3.1B (2) 4486954	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
F3.1C 4473435	Sheet Vinyl Flooring	Homogeneous Blue/gray Fibrous Bound	50%	Cellulose	50%	Vinyl	None Detected
F3.1C (2) 4486970	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
F8.5A 4473436	Wood Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.5B 4473437	Wood Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.5C 4473438	Wood Underlayment	Homogeneous Beige Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
F4.1A 4473439	Fibrous Backing Material	Homogeneous Gray/beige Fibrous Loose	100%	Cellulose	None Detected
F4.1B 4473440	Fibrous Backing Material	Homogeneous Gray/beige Fibrous Loose	100%	Cellulose	None Detected
F4.1C 4473441	Fibrous Backing Material	Homogeneous Gray/beige Fibrous Loose	100%	Cellulose	None Detected
F5.5A 4473442	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound	100%	Mastic	None Detected
F5.5B 4473443	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound	100%	Mastic	None Detected
F5.5C 4473444	Carpet Mastic	Homogeneous Dark-yellow Non-Fibrous Bound	100%	Mastic	None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous			%
F5.6A	Carpet Mastic W/	Homogeneous	10%	Cellulose	90%	Mastic	None Detected
Layer A	Fibrous Woven	Yellow					
4473445	Material	Non-Fibrous					
		Bound					
Layer B	Fibrous Backing	Homogeneous	90%	Cellulose			None Detected
4473445	Material	Beige	10%	Glass			
		Fibrous					
		Loose					
F5.6B	Carpet Mastic W/	Homogeneous	10%	Cellulose	90%	Mastic	None Detected
Layer A	Fibrous Woven	Yellow					
4473446	Material	Non-Fibrous					
		Bound					
Layer B	Fibrous Backing	Homogeneous	90%	Cellulose			None Detected
4473446	Material	Beige	10%	Glass			
		Fibrous					
		Loose					
F5.6C	Carpet Mastic W/	Homogeneous	10%	Cellulose	90%	Mastic	None Detected
Layer A	Fibrous Woven	Yellow					
4473447	Material	Non-Fibrous					
		Bound					
Layer B	Fibrous Backing	Homogeneous	90%	Cellulose			None Detected
4473447	Material	Beige	10%	Glass			
		Fibrous					
		Loose					



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous	%
F5.7A Layer A 4473448	Carpet Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected	
Layer B 4473448	Woven Underlayment	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected	
F5.7B Layer A 4473449	Carpet Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected	
Layer B 4473449	Woven Underlayment	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected	
F5.7C Layer A 4473450	Carpet Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected	
Layer B 4473450	Woven Underlayment	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected	
F8.6A 4473451	Wood Fiberboard	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
F8.6B 4473452	Wood Fiberboard	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
F8.6C 4473453	Wood Fiberboard	Homogeneous Tan Fibrous Loosely Bound	90%	Cellulose	10%	Binder	None Detected
M1.1A Layer A 4473454	Joint Compound	Homogeneous Off-white Non-Fibrous Bound			30% 70%	Calc Carb Binder	None Detected
Layer B 4473454	Tape	Homogeneous Beige Fibrous Loose	100%	Cellulose			None Detected
Layer C 4473454	Drywall	Homogeneous White Fibrous Bound	20%	Cellulose	80%	Gypsum	None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous			%
M1.1B Layer A 4473455	Joint Compound	Homogeneous		30%	Calc Carb	None Detected	
		Off-white		70%	Binder		
		Non-Fibrous Bound					
Layer B 4473455	Tape	Homogeneous	100%	Cellulose		None Detected	
		Beige					
		Fibrous Loose					
Layer C 4473455	Drywall	Homogeneous	20%	Cellulose	80%	Gypsum	None Detected
		White					
		Fibrous Bound					
M1.1C Layer A 4473456	Joint Compound	Homogeneous		30%	Calc Carb	None Detected	
		Off-white		70%	Binder		
		Non-Fibrous Bound					
Layer B 4473456	Tape	Homogeneous	100%	Cellulose		None Detected	
		Beige					
		Fibrous Loose					
Layer C 4473456	Drywall	Homogeneous	20%	Cellulose	80%	Gypsum	None Detected
		White					
		Fibrous Bound					
M1.2A 4473457	Wood Fiberboard Wall Panel	Heterogeneous	85%	Cellulose	10%	Binder	None Detected
		Brown			5%	Paint	
		Fibrous Loosely Bound					



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M1.2B 4473458	Wood Fiberboard Wall Panel	Heterogeneous Brown Fibrous Loosely Bound	85%	Cellulose	10% 5%	Binder Paint	None Detected
M1.2C 4473459	Wood Fiberboard Wall Panel	Heterogeneous Brown Fibrous Loosely Bound	85%	Cellulose	10% 5%	Binder Paint	None Detected
M21.11A 4473460	Wall Covering	Homogeneous Red Fibrous Bound	50%	Cellulose	40% 10%	Vinyl Mastic	None Detected
M21.11B 4473461	Wall Covering	Homogeneous Red Fibrous Bound	50%	Cellulose	40% 10%	Vinyl Mastic	None Detected
M21.11C 4473462	Wall Covering	Homogeneous White Fibrous Bound	50%	Cellulose	40% 10%	Vinyl Mastic	None Detected
M20.1A 4473463	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected
M20.1B 4473464	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic	None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M20.1C 4473465	Mastic	Homogeneous Yellow Non-Fibrous Bound		100%	Mastic		None Detected
M5.1A 4473466	Ceiling Panel	Heterogeneous White/yellow Fibrous Loose	90%	Glass	10%	Vinyl	None Detected
M5.1B 4473467	Ceiling Panel	Heterogeneous White/yellow Fibrous Loose	90%	Glass	10%	Vinyl	None Detected
M5.1C 4473468	Ceiling Panel	Heterogeneous White/yellow Fibrous Loose	90%	Glass	10%	Vinyl	None Detected
M5.2A 4473469	Ceiling Tile	Heterogeneous Beige Fibrous Loosely Bound	50% 30%	Cellulose Glass	5% 15%	Paint Perlite	None Detected
M5.2B 4473470	Ceiling Tile	Heterogeneous Beige Fibrous Loosely Bound	50% 30%	Cellulose Glass	5% 15%	Paint Perlite	None Detected
M5.2C 4473471	Ceiling Tile	Heterogeneous Beige Fibrous Loosely Bound	50% 30%	Cellulose Glass	5% 15%	Paint Perlite	None Detected



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M10.1A Layer A 4473472	Surface Material	Heterogeneous	15%	Cellulose	5%	Paint	None Detected
		Beige			25%	Calc Carb	
		Fibrous			55%	Binder	
		Bound					
Layer B 4473472	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White			15%	Silica	
		Non-Fibrous			65%	Binder	
		Bound					
Layer C 4473472	Plaster Base Coat	Homogeneous			25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					
M10.1B Layer A 4473473	Tape	Homogeneous	100%	Cellulose			None Detected
		Beige					
		Fibrous					
		Loosely Bound					
Layer B 4473473	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White			15%	Silica	
		Non-Fibrous			65%	Binder	
		Bound					
Layer C 4473473	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					



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Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M10.1C Layer A 4473474	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White			15%	Silica	
		Non-Fibrous			65%	Binder	
		Bound					
Layer B 4473474	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					
M10.1D Layer A 4473475	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White			15%	Silica	
		Non-Fibrous			65%	Binder	
		Bound					
Layer B 4473475	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					
M10.1E Layer A 4473476	Surface Material	Heterogeneous	15%	Cellulose	5%	Paint	None Detected
		Beige			25%	Calc Carb	
		Fibrous			55%	Binder	
		Bound					
Layer B 4473476	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White			15%	Silica	
		Non-Fibrous			65%	Binder	
		Bound					
Layer C 4473476	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					



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Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M1.3A Layer A 4473477	Joint Compound	Heterogeneous			30%	Calc Carb	Chrysotile 2%
		Off-white/blue			5%	Paint	
		Non-Fibrous			63%	Binder	
		Bound					
Layer B 4473477	Tape	Homogeneous	100%	Cellulose			None Detected
		Beige					
		Fibrous					
		Loose					
Layer C 4473477	Drywall	Homogeneous	20%	Cellulose	80%	Gypsum	None Detected
		White					
		Fibrous					
		Bound					
M1.3B 4473478		Sample Not Analyzed per Client Request					
M1.3C 4473479		Sample Not Analyzed per Client Request					
S3.3A 4473480	Texture	Heterogeneous			30%	Calc Carb	Chrysotile 2%
		Off-white			5%	Paint	
		Non-Fibrous			63%	Binder	
		Bound					
S3.3B 4473481	Texture	Heterogeneous			30%	Calc Carb	Chrysotile 2%
		Off-white			5%	Paint	
		Non-Fibrous			63%	Binder	
		Bound					
S3.3C 4473482	Texture	Heterogeneous			30%	Calc Carb	Chrysotile 2%
		Off-white			5%	Paint	
		Non-Fibrous			63%	Binder	
		Bound					



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Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous			%
S4.1A 4473483	Texture	Heterogeneous		20%	Calc Carb	None Detected	
		Beige		10%	Paint		
		Non-Fibrous		10%	Perlite		
		Bound		60%	Binder		
S4.1B 4473484	Texture	Heterogeneous		20%	Calc Carb	None Detected	
		Beige		10%	Paint		
		Non-Fibrous		10%	Perlite		
		Bound		60%	Binder		
S4.1C 4473485	Texture	Heterogeneous		20%	Calc Carb	None Detected	
		Beige		10%	Paint		
		Non-Fibrous		10%	Perlite		
		Bound		60%	Binder		
M5.3A 4473486	Wood Fiberboard Panel	Heterogeneous	85%	Cellulose	5%	Paint	None Detected
		Brown			10%	Binder	
		Fibrous					
		Loosely Bound					
M5.3B 4473487	Wood Fiberboard Panel	Heterogeneous	85%	Cellulose	5%	Paint	None Detected
		Brown			10%	Binder	
		Fibrous					
		Loosely Bound					
M5.3C 4473488	Wood Fiberboard Panel	Heterogeneous	85%	Cellulose	5%	Paint	None Detected
		Brown			10%	Binder	
		Fibrous					
		Loosely Bound					



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Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%
M1.4A Layer A 4473489	Joint Compound	Homogeneous		30%	Calc Carb	None Detected
		Beige		70%	Binder	
		Non-Fibrous				
		Bound				
Layer B 4473489	Tape	Homogeneous	100%	Cellulose		None Detected
		Beige				
		Fibrous				
		Loose				
Layer C 4473489	Drywall	Homogeneous	20%	Cellulose	80%	None Detected
		White				
		Fibrous				
		Bound				
M1.4B Layer A 4473490	Joint Compound	Homogeneous		30%	Calc Carb	None Detected
		Beige		70%	Binder	
		Non-Fibrous				
		Bound				
Layer B 4473490	Tape	Homogeneous	100%	Cellulose		None Detected
		Beige				
		Fibrous				
		Loose				
Layer C 4473490	Drywall	Homogeneous	20%	Cellulose	80%	None Detected
		White				
		Fibrous				
		Bound				



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Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%
M1.4C Layer A 4473491	Joint Compound	Homogeneous Beige Non-Fibrous Bound		30% 70%	Calc Carb Binder	None Detected
Layer B 4473491	Tape	Homogeneous Beige Fibrous Loose	100%	Cellulose		None Detected
Layer C 4473491	Drywall	Homogeneous White Fibrous Bound	20%	Cellulose	80% Gypsum	None Detected
S3.4A 4473492	Texture	Heterogeneous Beige Non-Fibrous Bound		30% 5% 65%	Calc Carb Paint Binder	None Detected
S3.4B 4473493	Texture	Heterogeneous Beige Non-Fibrous Bound		30% 5% 65%	Calc Carb Paint Binder	None Detected
S3.4C 4473494		No Sample In Bag				
R4.1A Layer A 4473495	Built-Up Roofing	Homogeneous Black Fibrous Bound	60%	Cellulose	40% Tar	None Detected
Layer B 4473495	Wood Fiberboard	Homogeneous Brown Fibrous Loose	100%	Cellulose		None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
R4.1B	Built-Up Roofing	Homogeneous	60%	Cellulose	40%	Tar	None Detected
Layer A		Black					
4473496		Fibrous					
		Bound					
Layer B	Wood Fiberboard	Homogeneous	100%	Cellulose			None Detected
4473496		Brown					
		Fibrous					
		Loose					
R4.1C	Built-Up Roofing	Homogeneous	60%	Cellulose	40%	Tar	None Detected
Layer A		Black					
4473497		Fibrous					
		Bound					
Layer B	Wood Fiberboard	Homogeneous	100%	Cellulose			None Detected
4473497		Brown					
		Fibrous					
		Loose					
R5.1A	Shingle	Homogeneous	40%	Cellulose	10%	Gravel	None Detected
4473498		Black			50%	Tar	
		Fibrous					
		Bound					
R5.1B	Shingle	Homogeneous	40%	Cellulose	10%	Gravel	None Detected
4473499		Black			50%	Tar	
		Fibrous					
		Bound					
R5.1C	Shingle	Homogeneous	40%	Cellulose	10%	Gravel	None Detected
4473500		Black			50%	Tar	
		Fibrous					
		Bound					



Built Environment Testing

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By: Polarized Light Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
R8.1A 4473501	Tar Paper	Homogeneous Black Fibrous Bound	70%	Cellulose	30%	Tar	None Detected
R8.1B 4473502	Tar Paper	Homogeneous Black Fibrous Bound	70%	Cellulose	30%	Tar	None Detected
R8.1C 4473503	Tar Paper	Homogeneous Black Fibrous Bound	70%	Cellulose	30%	Tar	None Detected
T10.1A 4473504	Glass Insulation	Homogeneous White Fibrous Loose	100%	Glass			None Detected
T10.1B 4473505	Glass Insulation	Homogeneous White Fibrous Loose	100%	Glass			None Detected
T10.1C 4473506	Glass Insulation	Homogeneous White Fibrous Loose	100%	Glass			None Detected



Built Environment Testing

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Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
T5.1A Layer A 4473507	Wrap	Homogeneous White Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473507	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass	None Detected
T5.1B Layer A 4473508	Wrap	Homogeneous White Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473508	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass	None Detected
T5.1C Layer A 4473509	Wrap	Homogeneous White Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473509	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass	None Detected



Built Environment Testing

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Lab Code: 753434-1
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Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
T5.2A Layer A 4473510	Wrap	Homogeneous Gray Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473510	Glass Insulation	Homogeneous Yellow Fibrous Loose	100%	Glass	None Detected
T5.2B Layer A 4473511	Wrap	Homogeneous Gray Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473511	Glass Insulation	Homogeneous Yellow Fibrous Loose	100%	Glass	None Detected
T5.2C Layer A 4473512	Wrap	Homogeneous Gray Non-Fibrous Bound	100%	Vinyl	None Detected
Layer B 4473512	Glass Insulation	Homogeneous Yellow Fibrous Loose	100%	Glass	None Detected
M21.2A 4473513	Woven Paper Wall Covering	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

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P.O. Box 9053
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Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
M21.2B 4473514	Woven Paper Wall Covering	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected
M21.2C 4473515	Woven Paper Wall Covering	Homogeneous Beige Fibrous Loose	100%	Cellulose	None Detected
T14.1A Layer A 4473516	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass	None Detected
Layer B 4473516	Adhesive	Homogeneous Black Non-Fibrous Bound		100% Tar	None Detected
Layer C 4473516	Wrap	Homogeneous Silver/beige Fibrous Loosely Bound	60%	Cellulose 30% Foil 10% Binder	None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

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P.O. Box 9053
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Lab Code: 753434-1
Date Received: 05/26/26
Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%
T14.1B Layer A 4473517	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass		None Detected
Layer B 4473517	Adhesive	Homogeneous Black Non-Fibrous Bound		100%	Tar	None Detected
Layer C 4473517	Wrap	Homogeneous Silver/beige Fibrous Loosely Bound	60%	Cellulose 30%	Foil 10% Binder	None Detected
T14.1C Layer A 4473518	Glass Insulation	Homogeneous Pink Fibrous Loose	100%	Glass		None Detected
Layer B 4473518	Adhesive	Homogeneous Black Non-Fibrous Bound		100%	Tar	None Detected
Layer C 4473518	Wrap	Homogeneous Silver/beige Fibrous Loosely Bound	60%	Cellulose 30%	Foil 10% Binder	None Detected
M1.6A 4473519	Wood Fiberboard Panel	Homogeneous Tan Fibrous Loose	100%	Cellulose		None Detected



Built Environment Testing

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Client: GEM Environmental
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Missoula, MT 59807

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Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous			%
M1.6B 4473520	Wood Fiberboard Panel	Homogeneous Tan Fibrous Loose	100%	Cellulose			None Detected
M1.6C 4473521	Wood Fiberboard Panel	Homogeneous Tan Fibrous Loose	100%	Cellulose			None Detected
F11.1A 4473522	Sheet Vinyl	Homogeneous Beige/black Fibrous Bound	60%	Cellulose	20% 20%	Tar Vinyl	None Detected
F11.1A (2) 4490105	Mastic	Homogeneous Brown Non-Fibrous Bound			100%	Mastic	None Detected
F11.1B 4473523	Sheet Vinyl	Homogeneous Beige/black Fibrous Bound	60%	Cellulose	20% 20%	Tar Vinyl	None Detected
F11.1B (2) 4490111	Mastic	Homogeneous Brown Non-Fibrous Bound			100%	Mastic	None Detected
F11.1C 4473524	Sheet Vinyl	Homogeneous Beige/black Fibrous Bound	60%	Cellulose	20% 20%	Tar Vinyl	None Detected



Built Environment Testing

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Missoula, MT 59807

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Date Analyzed: 06/01/26 - 06/02/26
Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%
F11.1C (2) 4490112	Mastic	Homogeneous Brown Non-Fibrous Bound		100%	Mastic	None Detected
M21.3A 4473525	Wallpaper	Homogeneous White/beige Fibrous Bound	75%	Cellulose 10%	Vinyl Binder Paint	None Detected
M21.3B 4473526	Wallpaper	Homogeneous White/beige Fibrous Bound	75%	Cellulose 10%	Vinyl Binder Paint	None Detected
M21.3C 4473527	Wallpaper	Homogeneous White/beige Fibrous Bound	75%	Cellulose 10%	Vinyl Binder Paint	None Detected
S4.2A 4473528	Texture W/ Tape	Heterogeneous Beige Fibrous Bound	15%	Cellulose 5%	Paint Calc Carb Binder	None Detected
S4.2B 4473529	Texture W/ Tape	Heterogeneous Beige Fibrous Bound	15%	Cellulose 5%	Paint Calc Carb Binder	None Detected
S4.2C 4473530	Texture W/ Tape	Heterogeneous Beige Fibrous Bound	15%	Cellulose 5%	Paint Calc Carb Binder	None Detected



Built Environment Testing

ASBESTOS BULK ANALYSIS

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Date Reported: 06/02/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
M10.1F Layer A 4473531	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White		15%	Silica		
		Non-Fibrous		65%	Binder		
		Bound					
Layer B 4473531	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					
M10.1G Layer A 4473532	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White		15%	Silica		
		Non-Fibrous		65%	Binder		
		Bound					
Layer B 4473532	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					
M10.1H Layer A 4473533	Plaster Skim Coat	Homogeneous			20%	Calc Carb	None Detected
		White		15%	Silica		
		Non-Fibrous		65%	Binder		
		Bound					
Layer B 4473533	Plaster Base Coat	Homogeneous	<1%	Hair	25%	Calc Carb	None Detected
		Gray			45%	Silica	
		Non-Fibrous			30%	Binder	
		Bound					



Built Environment Testing

LEGEND:

Non-Anth = Non-Asbestiform Anthophyllite

Non-Trem = Non-Asbestiform Tremolite

Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763**REPORTING LIMIT:** 1% by calibrated visual estimation**REGULATORY LIMIT:** 1%

Due to the limitations of the EPA 600 / R93 / 116 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. Estimated measurement of uncertainty is available on request.

Eurofins Built Environment Testing East, LLC makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins Built Environment Testing East, LLC. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

Information provided by customer includes customer sample ID and sample description.

Katelyn Wix
Analyst**DATA QA:**Samantha Webster
6/2/2026**APPROVED BY:**Kamila Reichert,
Laboratory Director

SUBMITTED BY	INVOICE TO	CONTACT INFORMATION	SERIES
Company: GEM Environmental	Company: GEM Environmental	Contact: Chris Casas	-1 PLM Standard
Address: P.O. Box 9053	Address: P.O. Box 9053	Phone: (406) 370-4139	
Missoula, MT 59807	Missoula, MT 59807	Fax:	
		Cell: (406) 370-4139	
Project Number and/or P.O. #: None Given	Project Zip Code:	Final Data Deliverable Email Address:	
Project Description/Location: Missoula County - 311 Woody St Missoula MT.		chris.casas@gem-environmental.com (+ 2 ADDNL. CONTACTS)	

ASBESTOS LABORATORY					REQUESTED ANALYSIS							VALID MATRIX CODES						LAB NOTES			
PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD					PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A Bulk = B						MT
															Dust = D Food = F						
															Paint = P Soil = S						
															Surface = SU Swab = SW						
															Tape = T Wipe = W						
															Drinking Water = DW						
															Waste Water = WW						
															ASTM E1792 approved wipe media only						
															Sample Volume (L) / Area						
															Sample Temperature (°C)						
					Length(or Aliquots) x Width(or Area/Aliquot)																
					Matrix Code																
					# of Containers																
					Date Collected mm/dd/yy																
					Time Collected hh:mm																
											Laboratory Analysis Instructions										
Special Instructions:					ASBESTOS		CHEMISTRY		MICROBIOLOGY		ICO										
Client Sample ID Number (Sample ID's must be unique)					ASBESTOS		CHEMISTRY		MICROBIOLOGY		ICO										
1 F6.1A					X																
2 F6.1B					X																
3 F6.1C					X																
4 F8.1A					X																
5 F8.1B					X																
6 F8.1C					X																
7 F5.1A					X																
8 F5.1B					X																
9 F5.1C					X																
10 F8.2A					X																
11 F8.2B					X																
12 F8.2C					X																
13 F5.2A					X																

Eurofins Built Environment Testing East, LLC establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number.

Eurofins Built Environment Testing East, LLC will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall constitute an analytical services agreement with payment terms of NET30. Failure to comply with payment terms may result in a 18% APR finance charge.

Relinquished By:	Date/Time: 05/26/2026 13:50:29	Sample Condition: Acceptable
Received By: 	Date/Time: 05/26/2026 14:50:41	Carrier: Fed-Ex

Built Environment Testing

RES Job #: 753434

Submitted By: **GEM Environmental**



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

Client Sample ID Number	REQUESTED ANALYSIS										VALID MATRIX CODES						LAB NOTES
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A		Bulk = B		MT		
											Dust = D		Food = F				
											Paint = P		Soil = S				
Surface = SU		Swab = SW															
Tape = T		Wipe = W															
										Drinking Water = DW							
										Waste Water = WW							
										ASTM E1792 approved wipe media only							
											Sample Volume (L) / Area	Sample Temperature (°C)	Length (or Aliquots) x Width (or Area) (Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm
	ASBESTOS	CHEMISTRY	MICROBIOLOGY	ICO													
14 F5.2B	X													B			
15 F5.2C	X													B			
16 F8.3A	X													B			
17 F8.3B	X													B			
18 F8.3C	X													B			
19 F5.3A	X													B			
20 F5.3B	X													B			
21 F5.3C	X													B			
22 F5.4A	X													B			
23 F5.4B	X													B			
24 F5.4C	X													B			
25 F8.4A	X													B			
26 F8.4B	X													B			
27 F8.4C	X													B			
28 F3.1A	X													B			
29 F3.1B	X													B			
30 F3.1C	X													B			
31 F8.5A	X													B			
32 F8.5B	X													B			
33 F8.5C	X													B			
34 F4.1A	X													B			
35 F4.1B	X													B			
36 F4.1C	X													B			
37 F5.5A	X													B			
38 F5.5B	X													B			
39 F5.5C	X													B			
40 F5.6A	X													B			
41 F5.6B	X													B			
42 F5.6C	X													B			
43 F5.7A	X													B			

Laboratory Analysis Instructions

Built Environment Testing

Submitted By: **GEM Environmental**



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

Client Sample ID Number	REQUESTED ANALYSIS										VALID MATRIX CODES						LAB NOTES
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A	Bulk = B					
											Dust = D	Food = F					
											Paint = P	Soil = S					
											Surface = SU	Swab = SW					
											Tape = T	Wipe = W					
											Drinking Water = DW						
											Waste Water = WW						
											ASTM E1792 approved wipe media only						
											Sample Volume (L) / Area	Sample Temperature (°C)	Length (or Aliquots) x Width (or Area) (Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm
44 F5.7B	X													B			
45 F5.7C	X													B			
46 F8.6A	X													B			
47 F8.6B	X													B			
48 F8.6C	X													B			
49 M1.1A	X													B			
50 M1.1B	X													B			
51 M1.1C	X													B			
52 M1.2A	X													B			
53 M1.2B	X													B			
54 M1.2C	X													B			
55 M21.11A	X													B			
56 M21.11B	X													B			
57 M21.11C	X													B			
58 M20.1A	X													B			
59 M20.1B	X													B			
60 M20.1C	X													B			
61 M5.1A	X													B			
62 M5.1B	X													B			
63 M5.1C	X													B			
64 M5.2A	X													B			
65 M5.2B	X													B			
66 M5.2C	X													B			
67 M10.1A	X													B			
68 M10.1B	X													B			
69 M10.1C	X													B			
70 M10.1D	X													B			
71 M10.1E	X													B			
72 M1.3A	X													B			
73 M1.3B	X													B			



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

Client Sample ID Number	REQUESTED ANALYSIS										VALID MATRIX CODES							LAB NOTES					
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A	Bulk = B	Dust = D	Food = F	Paint = P	Soil = S	Surface = SU	Swab = SW	Tape = T	Wipe = W	Drinking Water = DW	Waste Water = WW	**ASTM E1792 approved wipe media only**
											Sample Volume (L) / Area	Sample Temperature (°C)	Length (or Aliquots) x Width (or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm						
74 M1.3C	X													B									
75 S3.3A	X													B									
76 S3.3B	X													B									
77 S3.3C	X													B									
78 S4.1A	X													B									
79 S4.1B	X													B									
80 S4.1C	X													B									
81 M5.3A	X													B									
82 M5.3B	X													B									
83 M5.3C	X													B									
84 M1.4A	X													B									
85 M1.4B	X													B									
86 M1.4C	X													B									
87 S3.4A	X													B									
88 S3.4B	X													B									
89 S3.4C	X													B									
90 R4.1A	X													B									
91 R4.1B	X													B									
92 R4.1C	X													B									
93 R5.1A	X													B									
94 R5.1B	X													B									
95 R5.1C	X													B									
96 R8.1A	X													B									
97 R8.1B	X													B									
98 R8.1C	X													B									
99 T10.1A	X													B									
100 T10.1B	X													B									
101 T10.1C	X													B									
102 T5.1A	X													B									
103 T5.1B	X													B									

Laboratory Analysis Instructions



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

Client Sample ID Number (Sample ID's must be unique)	REQUESTED ANALYSIS										VALID MATRIX CODES						LAB NOTES								
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A	Bulk = B	Dust = D	Food = F	Paint = P	Soil = S	Surface = SU	Swab = SW	Tape = T	Wipe = W	Drinking Water = DW	Waste Water = WW	**ASTM E1792 approved wipe media only**	Laboratory Analysis Instructions	
104 T5.1C	X																								
105 T5.2A	X																								
106 T5.2B	X																								
107 T5.2C	X																								
108 M21.2A	X																								
109 M21.2B	X																								
110 M21.2C	X																								
111 T14.1A	X																								
112 T14.1B	X																								
113 T14.1C	X																								
114 M1.6A	X																								
115 M1.6B	X																								
116 M1.6C	X																								
117 F11.1A	X																								
118 F11.1B	X																								
119 F11.1C	X																								
120 M21.3A	X																								
121 M21.3B	X																								
122 M21.3C	X																								
123 S4.2A	X																								
124 S4.2B	X																								
125 S4.2C	X																								
126 M10.1F	X																								
127 M10.1G	X																								
128 M10.1H	X																								



Exhibit A

753434

128

CHAIN OF CUSTODY

CEI

730 SE Maynard Road, Cary, NC 27511

Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY:

ECEI Lab Code:

ECEI Lab I.D. Range:

COMPANY INFORMATION	PROJECT INFORMATION
ECEI CLIENT #: 29725	Job Contact: Christopher Casas
Company: GEM Environmental, Inc.	Email / Tel: chris.casas@gem-environmental.com
Address: P.O. Box 9053	Project Name: <i>Missoula County - 311 W 800th St</i>
Missoula, MT 59807	Project ID#:
Email: chris.casas@gem-environmental.com	PO #:
Tel: 406-370-4139 Fax:	STATE SAMPLES COLLECTED IN: MT

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	8 HR	1 DAY	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	☐	☐	☐	☐	☐	☒
PLM POINT COUNT (400)	EPA 600	☐	☐	☐	☐	☐	☐
PLM POINT COUNT (1000)	EPA 600	☐	☐	☐	☐	☐	☐
PLM GRAV w POINT COUNT	EPA 600	☐	☐	☐	☐	☐	☐
PLM BULK	CARB 435	☐	☐	☐	☐	☐	☐
PCM AIR*	NIOSH 7400	☐	☐	☐	☐	☐	☐
TEM AIR	EPA AHERA	☐	☐	☐	☐	☐	☐
TEM AIR	NIOSH 7402	☐	☐	☐	☐	☐	☐
TEM AIR (PCME)	ISO 10312	☐	☐	☐	☐	☐	☐
TEM AIR	ASTM 6281-15	☐	☐	☐	☐	☐	☐
TEM BULK	CHATFIELD	☐	☐	☐	☐	☐	☐
TEM DUST WIPE	ASTM D6480-05 (2010)	☐	☐	☐	☐	☐	☐
TEM DUST MICROVAC	ASTM D5755-09 (2014)	☐	☐	☐	☐	☐	☐
TEM SOIL	ASTM D7521-16	☐	☐	☐	☐	☐	☐
TEM VERMICULITE	CINCINNATI METHOD	☐	☐	☐	☐	☐	☐
TEM QUALITATIVE	IN-HOUSE METHOD	☐	☐	☐	☐	☐	☐
OTHER:		☐	☐	☐	☐	☐	☐

*Blanks should be taken from the same sample lot as field samples.

REMARKS / SPECIAL INSTRUCTIONS:

☒ Accept Samples☐ Reject Samples

Relinquished By:

Date/Time

Received By:

Date/Time

By submitting samples, you are agreeing to ECEI's Terms and Conditions.
Samples will be disposed of 30 days after analysis

COMPANY CONTACT INFORMATION	
Company: GEM Environmental, Inc.	Job Contact: Christopher Casas
Project Name:	
Project ID #:	Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
F6.1 / F6.1	WOOD Parquet Flooring w/ Yellow/Cream Mastic + White		PLM ☐	TEM ☐
	Weave (F6.1) + WOOD FIBER		PLM ☐	TEM ☐
	Board UNDERLAYMENT (F6.1)		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.1 / F6.2	Light yellow mastic (F6.1)		PLM ☐	TEM ☐
	+ FINE WOOD ^{FIBER, Board} UNDERLAYMENT		PLM ☐	TEM ☐
	(F6.2) ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.2 / F6.3	MEDIUM Dark Yellow		PLM ☐	TEM ☐
	Carpet Mastic, w/		PLM ☐	TEM ☐
	Carpet Backing (F6.2) +		PLM ☐	TEM ☐
	WOOD FIBER Board UNDERLAYMENT		PLM ☐	TEM ☐
	(F6.3) ↓ ↓ ↓		PLM ☐	TEM ☐
A B C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.3	Yellow Carpet Backing		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.4 (F6.4)	Yellow Carpet Mastic (F6.4)		PLM ☐	TEM ☐
	ON WOOD FIBER Board		PLM ☐	TEM ☐
	UNDERLAYMENT (F6.4)		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

All Samples Collected on 05.21.26

Page 2 of

SAMPLING FORM

CEI

COMPANY CONTACT INFORMATION

Company: GEM Environmental, Inc.

Job Contact: Christopher Casas

Project Name:

Project ID #:

Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
F8.1 / F8.5	Blue Vinyl sheet flooring		PLM ☐	TEM ☐
	w/ Light yellow mastic (F8.1)		PLM ☐	TEM ☐
	+ Thru Plywood underlayment (F8.5)		PLM ☐	TEM ☐
ABC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F4.1	Residual Backing of		PLM ☐	TEM ☐
	Floor Coverings, 8		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.5	Dark yellow Carpet mastic		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.6	Yellow Carpet mastic		PLM ☐	TEM ☐
	/ Backing.		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.7 / F8.6	Yellow carpet mastic (F8.7)		PLM ☐	TEM ☐
	on Thin underlayment,		PLM ☐	TEM ☐
	on FINE wood Fiber Board (F8.6)		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.1	Dry Wall system (G.C./DW)		PLM ☐	TEM ☐
	Tape). ↓		PLM ☐	TEM ☐
A B C	↓ ↓		PLM ☐	TEM ☐
		(M1.2)	PLM ☐	TEM ☐
M1.2 / M21.1	Brown wood Fiber Board Wall panels w/		PLM ☐	TEM ☐
M20.1	Yellow mastic (M20.1) + Textile		PLM ☐	TEM ☐
	Wall covering (M21.1)		PLM ☐	TEM ☐
A B C	↓ ↓ ↓			

Page 3 of

All Samples collected on
08.21.28

COMPANY CONTACT INFORMATION

Company: GEM Environmental, Inc.

Job Contact: Christopher Casas

Project Name:

Project ID #:

Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
			PLM	TEM
M6.1	2x4 Fiberglass ceiling		☐	☐
	Panels w/ heavy face		☐	☐
	Covering		☐	☐
A, B, C	↓ ↓ ↓		☐	☐
			☐	☐
			☐	☐
M6.2	2x4 white synthetic		☐	☐
	ceiling tiles w/ fissures +		☐	☐
	pinholes, (M6.2)		☐	☐
A, B, C	↓ ↓ ↓		☐	☐
			☐	☐
M10.1	Plaster white skim		☐	☐
	coat over light gray		☐	☐
	base coat		☐	☐
A, B, C, D, E	↓ ↓ ↓		☐	☐
			☐	☐
M1.3/S3.3	Drywall system (JC/Tape/DW)		☐	☐
	(M1.3) + LACE texture		☐	☐
	(S3.3) ↓ ↓ ↓		☐	☐
A B C	↓ ↓ ↓		☐	☐
			☐	☐
S4.1	Popcorn ceiling texture		☐	☐
A B C	↓ ↓ ↓		☐	☐
			☐	☐
M5.3	Thin High Density wood		☐	☐
	Fiber Board Acoustical		☐	☐
	panels ↓ ↓ ↓		☐	☐
A B C	↓ ↓ ↓		☐	☐

All samples collected on
 05.21.26

Page 4 of

CEI

COMPANY CONTACT INFORMATION	
Company: GEM Environmental, Inc.	Job Contact: Christopher Casas
Project Name:	
Project ID #:	Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
M1.4/33.4	Drywall system (JC tape, DW)		PLM ☐	TEM ☐
	M1.4 to spawed on		PLM ☐	TEM ☐
	Texture (33.4)		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.5/33.5	Drywall system (JC tape, DW)		PLM ☐	TEM ☐
	M1.5 + textured on texture (33.5)		PLM ☐	TEM ☐
A, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
R4.1	FLAT BOILT UP Roof:		PLM ☐	TEM ☐
	Wood Fiber Board w/ TAR		PLM ☐	TEM ☐
	Paper Rolled TAR over		PLM ☐	TEM ☐
	Black TAR on Decking.		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
R5.1/28.1	Blue Asph/Flt Shingles 25.1		PLM ☐	TEM ☐
	over TAR Paper (28.1)		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T10.1	Loose Fill White Fiber		PLM ☐	TEM ☐
	glass Insulation		PLM ☐	TEM ☐
A, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T5.1	White Vinyl Wrap +		PLM ☐	TEM ☐
	Pink Fiberglass Duct Run		PLM ☐	TEM ☐
A B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

COMPANY CONTACT INFORMATION

Company: GEM Environmental, Inc.

Job Contact: Christopher Casas

Project Name:

Project ID #:

Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
T5.2	Gray VINYL wrap, yellow FIBerglass INSULATION, Doet		PLM ☐	TEM ☐
	Roofs ↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M21.2	PAPER Based Wall Covering, weave pattern		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T14.1	ALUMINUM Backed FIBER GLASS INSULATION w/ BLACK ADHESIVE		PLM ☐	TEM ☐
	↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.6	WOOD FIBER Board panels		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F11.1	Insulation w/ Black BACKING + Brown MASTIC VINYL surface, beige/brown STREAKS		PLM ☐	TEM ☐
	↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M21.3	w Beige Wall paper w/ Floral Pattern		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
REMOVE S4.2	Light Blush no texture (S4.1) over (M10.1)		PLM ☐	TEM ☐

A, B, C
M10.1 F, G, H

Page 6 of

June 04, 2026

Chris Casas
GEM Environmental
P.O. Box 9053
Missoula, MT 59807

CLIENT PROJECT: Missoula County - 311 Woody St Missoula MT.
LAB CODE: 753434-2

Dear Chris,

Enclosed are asbestos analysis results for TEM bulk samples received at our laboratory on 05/26/26. The samples were analyzed for asbestos using transmission electron microscopy (TEM) per Chatfield/EPA 600/R-93/116 Sec. 2.5.5.1 method.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per the EPA regulatory requirements. The detection limit for the TEM Chatfield/EPA 600/R-93/116 Sec. 2.5.5.1 method is <1% depending on the processed weight and constituents of the sample.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Kamila Reichert,
Laboratory Director



Built Environment Testing

ASBESTOS ANALYTICAL REPORT
By: Transmission Electron Microscopy

Prepared for

GEM Environmental

CLIENT PROJECT:	Missoula County - 311 Woody St Missoula MT.
LAB CODE:	753434-2
TEST METHOD:	Bulk Chatfield EPA 600 / R93 / 116 Sec. 2.5.5.1
REPORT DATE:	06/04/26

Exhibit A



Built Environment Testing

ASBESTOS BULK ANALYSIS By: Transmission Electron Microscopy

Client: GEM Environmental
P.O. Box 9053
Missoula, MT 59807

Lab Code: 753434-2
Date Received: 05/26/26
Date Analyzed: 06/04/26
Date Reported: 06/04/26

Project: Missoula County - 311 Woody St Missoula MT.

Method: TEM BULK CHATFIELD / EPA 600 / R93 / 116 Sec. 2.5.5.1

Client ID	Material	Sample	Organic	Acid Soluble	Acid Insoluble	ASBESTOS
Lab ID	Description	Weight (g)	Material (%)	Material (%)	Material (%)	%
R4.1C 4491338	Black built-up roofing	0.76	95.42	2.62	1.96	None Detected

LEGEND: None

METHOD: Bulk Chatfield EPA 600 / R93 / 116 Sec. 2.5.5.1

LIMIT OF DETECTION: Varies with the weight and constituents of the sample (<1%)

REGULATORY LIMIT: 1%

Eurofins Built Environment Testing East, LLC makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins Built Environment Testing East, LLC. Estimated measurement of uncertainty is available on request. Samples were received in acceptable condition unless otherwise noted.

Information provided by customer includes customer sample ID, location, volume and area as well as date and time of sampling. Eurofins Built Environment Testing East, LLC recommends between 0.500 and 0.200 grams of sample material. Any weight below 0.100 grams is considered below protocol guidelines.



Partima Poudel Acharya
Analyst



DATA QA:

Kamila Reichert
6/4/2026



APPROVED BY:

Kamila Reichert,
Laboratory Director

SUBMITTED BY	INVOICE TO	CONTACT INFORMATION	SERIES
Company: GEM Environmental	Company: GEM Environmental	Contact: Chris Casas	-1 PLM Standard
Address: P.O. Box 9053	Address: P.O. Box 9053	Phone: (406) 370-4139	
Missoula, MT 59807	Missoula, MT 59807	Fax:	
		Cell: (406) 370-4139	
Project Number and/or P.O. #: None Given	Project Zip Code:	Final Data Deliverable Email Address:	
Project Description/Location: Missoula County - 311 Woody St Missoula MT.		chris.casas@gem-environmental.com (+ 2 ADDNL. CONTACTS)	

ASBESTOS LABORATORY	REQUESTED ANALYSIS										VALID MATRIX CODES	LAB NOTES
PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD	PLM - PLM Short Report (EPA/600/R-93/116)										Air = A Bulk = B Dust = D Food = F Paint = P Soil = S Surface = SU Swab = SW Tape = T Wipe = W Drinking Water = DW Waste Water = WW **ASTM E1792 approved wipe media only**	MT
CHEMISTRY LABORATORY												
Dust RUSH PRIORITY STANDARD												
Metals RUSH PRIORITY STANDARD												
Organics* SAME DAY RUSH PRIORITY STANDARD												
MICROBIOLOGY LABORATORY												
Viable Analysis** PRIORITY STANDARD												
Medical Device Analysis RUSH STANDARD												
Mold Analysis RUSH PRIORITY STANDARD												
Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.												
Special Instructions:												
Client Sample ID Number (Sample ID's must be unique)		ASBESTOS	CHEMISTRY	MICROBIOLOGY	ICO							Laboratory Analysis Instructions
1 F6.1A	X										B	
2 F6.1B	X										B	
3 F6.1C	X										B	
4 F8.1A	X										B	
5 F8.1B	X										B	
6 F8.1C	X										B	
7 F5.1A	X										B	
8 F5.1B	X										B	
9 F5.1C	X										B	
10 F8.2A	X										B	
11 F8.2B	X										B	
12 F8.2C	X										B	
13 F5.2A	X										B	

Eurofins Built Environment Testing East, LLC establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number.

Eurofins Built Environment Testing East, LLC will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall constitute an analytical services agreement with payment terms of NET30. Failure to comply with payment terms may result in a 18% APR finance charge.

Relinquished By:	Date/Time: 05/26/2026 13:50:29	Sample Condition: Acceptable
Received By: 	Date/Time: 05/26/2026 14:50:41	Carrier: Fed-Ex



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

Client Sample ID Number (Sample ID's must be unique)	REQUESTED ANALYSIS										VALID MATRIX CODES						LAB NOTES								
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD	Air = A	Bulk = B	Dust = D	Food = F	Paint = P	Soil = S	Surface = SU	Swab = SW	Tape = T	Wipe = W	Drinking Water = DW	Waste Water = WW	**ASTM E1792 approved wipe media only**	Laboratory Analysis Instructions	
14 F5.2B	X																								
15 F5.2C	X																								
16 F8.3A	X																								
17 F8.3B	X																								
18 F8.3C	X																								
19 F5.3A	X																								
20 F5.3B	X																								
21 F5.3C	X																								
22 F5.4A	X																								
23 F5.4B	X																								
24 F5.4C	X																								
25 F8.4A	X																								
26 F8.4B	X																								
27 F8.4C	X																								
28 F3.1A	X																								
29 F3.1B	X																								
30 F3.1C	X																								
31 F8.5A	X																								
32 F8.5B	X																								
33 F8.5C	X																								
34 F4.1A	X																								
35 F4.1B	X																								
36 F4.1C	X																								
37 F5.5A	X																								
38 F5.5B	X																								
39 F5.5C	X																								
40 F5.6A	X																								
41 F5.6B	X																								
42 F5.6C	X																								
43 F5.7A	X																								

Exhibit A

Submitted By: **GEM Environmental**

Client Sample ID Number	(Sample ID's must be unique)	ASBESTOS	CHEMISTRY	MICROBIOLOGY	ICO	San	San	Len	Mat	# of	Du	r	Ti	Instructions
44	F5.7B	X							B					
45	F5.7C	X							B					
46	F8.6A	X							B					
47	F8.6B	X							B					
48	F8.6C	X							B					
49	M1.1A	X							B					
50	M1.1B	X							B					
51	M1.1C	X							B					
52	M1.2A	X							B					
53	M1.2B	X							B					
54	M1.2C	X							B					
55	M21.11A	X							B					
56	M21.11B	X							B					
57	M21.11C	X							B					
58	M20.1A	X							B					
59	M20.1B	X							B					
60	M20.1C	X							B					
61	M5.1A	X							B					
62	M5.1B	X							B					
63	M5.1C	X							B					
64	M5.2A	X							B					
65	M5.2B	X							B					
66	M5.2C	X							B					
67	M10.1A	X							B					
68	M10.1B	X							B					
69	M10.1C	X							B					
70	M10.1D	X							B					
71	M10.1E	X							B					
72	M1.3A	X							B					
73	M1.3B	X							B					

Exhibit A



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental



Built Environment Testing

RES Job #: 753434

Submitted By: GEM Environmental

	REQUESTED ANALYSIS										VALID MATRIX CODES						LAB NOTES								
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD		Air = A	Bulk = B	MT											
												Dust = D	Food = F												
												Paint = P	Soil = S												
												Surface = SU	Swab = SW												
												Tape = T	Wipe = W												
												Drinking Water = DW													
												Waste Water = WW													
												ASTM E1792 approved wipe media only													
		Sample Volume (L) / Area	Sample Temperature (°C)	Length (or Aliquots) x Width (or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm																	
Client Sample ID Number	(Sample ID's must be unique)										ASBESTOS	CHEMISTRY	MICROBIOLOGY	ICO									Laboratory Analysis Instructions		
74 M1.3C																									
75 S3.3A																									
76 S3.3B																									
77 S3.3C																									
78 S4.1A																									
79 S4.1B																									
80 S4.1C																									
81 M5.3A																									
82 M5.3B																									
83 M5.3C																									
84 M1.4A																									
85 M1.4B																									
86 M1.4C																									
87 S3.4A																									
88 S3.4B																									
89 S3.4C																									
90 R4.1A																									
91 R4.1B																									
92 R4.1C																									
93 R5.1A																									
94 R5.1B																									
95 R5.1C																									
96 R8.1A																									
97 R8.1B																									
98 R8.1C																									
99 T10.1A																									
100 T10.1B																									
101 T10.1C																									
102 T5.1A																									
103 T5.1B																									

**Exhibit A**

753434

128

CHAIN OF CUSTODY

CEI

730 SE Maynard Road, Cary, NC 27511

Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY:

ECEI Lab Code:

ECEI Lab I.D. Range:

COMPANY INFORMATION		PROJECT INFORMATION
ECEI CLIENT #: 29725		Job Contact: Christopher Casas
Company: GEM Environmental, Inc.		Email / Tel: chris.casas@gem-environmental.com
Address: P.O. Box 9053		Project Name: <i>Missoula County - 311 W 800th St</i>
Missoula, MT 59807		Project ID#:
Email: chris.casas@gem-environmental.com		PO #:
Tel: 406-370-4139 Fax:		STATE SAMPLES COLLECTED IN: MT

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	8 HR	1 DAY	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	☐	☐	☐	☐	☐	☒
PLM POINT COUNT (400)	EPA 600	☐	☐	☐	☐	☐	☐
PLM POINT COUNT (1000)	EPA 600	☐	☐	☐	☐	☐	☐
PLM GRAV w POINT COUNT	EPA 600	☐	☐	☐	☐	☐	☐
PLM BULK	CARB 435	☐	☐	☐	☐	☐	☐
PCM AIR*	NIOSH 7400	☐	☐	☐	☐	☐	☐
TEM AIR	EPA AHERA	☐	☐	☐	☐	☐	☐
TEM AIR	NIOSH 7402	☐	☐	☐	☐	☐	☐
TEM AIR (PCME)	ISO 10312	☐	☐	☐	☐	☐	☐
TEM AIR	ASTM 6281-15	☐	☐	☐	☐	☐	☐
TEM BULK	CHATFIELD	☐	☐	☐	☐	☐	☐
TEM DUST WIPE	ASTM D6480-05 (2010)	☐	☐	☐	☐	☐	☐
TEM DUST MICROVAC	ASTM D5755-09 (2014)	☐	☐	☐	☐	☐	☐
TEM SOIL	ASTM D7521-16	☐	☐	☐	☐	☐	☐
TEM VERMICULITE	CINCINNATI METHOD	☐	☐	☐	☐	☐	☐
TEM QUALITATIVE	IN-HOUSE METHOD	☐	☐	☐	☐	☐	☐
OTHER:		☐	☐	☐	☐	☐	☐

*Blanks should be taken from the same sample lot as field samples.

REMARKS / SPECIAL INSTRUCTIONS:

☒ Accept Samples☐ Reject Samples

Relinquished By:

Date/Time

Received By:

Date/Time

By submitting samples, you are agreeing to ECEI's Terms and Conditions.

Samples will be disposed of 30 days after analysis

Page ____ of ____

Version: CCOC.07.18.1/2.LD

SAMPLING FORM

CEI

COMPANY CONTACT INFORMATION	
Company: GEM Environmental, Inc.	Job Contact: Christopher Casas
Project Name:	
Project ID #:	Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
F6.1 / F6.1	WOOD Parquet Flooring w/ Yellow/Cream Mastic + White		PLM ☐	TEM ☐
	Weave (F6.1) + WOOD FIBER		PLM ☐	TEM ☐
	Board UNDERLAYMENT (F6.1)		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.1 / F6.2	Light yellow mastic (F6.1)		PLM ☐	TEM ☐
	+ FINE WOOD ^{FIBER, Board} UNDERLAYMENT		PLM ☐	TEM ☐
	(F6.2) ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.2 / F6.3	MEDIUM Dark Yellow		PLM ☐	TEM ☐
	Carpet Mastic, w/		PLM ☐	TEM ☐
	Carpet Backing (F6.2) +		PLM ☐	TEM ☐
	WOOD FIBER Board UNDERLAYMENT		PLM ☐	TEM ☐
	(F6.3) ↓ ↓ ↓		PLM ☐	TEM ☐
A B C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.3	Yellow Carpet Backing		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F6.4 (F6.4)	Yellow Carpet Mastic (F6.4)		PLM ☐	TEM ☐
	ON WOOD FIBER Board		PLM ☐	TEM ☐
	UNDERLAYMENT (F6.4)		PLM ☐	TEM ☐
A B C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

All Samples Collected on 05.21.26

Page 2 of

COMPANY CONTACT INFORMATION	
Company: GEM Environmental, Inc.	Job Contact: Christopher Casas
Project Name:	
Project ID #:	Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
F8.1 / F8.5	Blue Vinyl sheet flooring		PLM ☐	TEM ☐
	w/ Light yellow mastic (F8.1)		PLM ☐	TEM ☐
	+ Thru Plywood underlayment (F8.5)		PLM ☐	TEM ☐
ABC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F4.1	Residual Backing of		PLM ☐	TEM ☐
	Floor coverings, 8		PLM ☐	TEM ☐
A BC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.5	Dark yellow Carpet mastic		PLM ☐	TEM ☐
ABC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.6	Yellow Carpet mastic		PLM ☐	TEM ☐
	/ Backing.		PLM ☐	TEM ☐
ABC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F8.7 / F8.6	Yellow carpet mastic (F8.7)		PLM ☐	TEM ☐
	on Thin underlayment,		PLM ☐	TEM ☐
	on FINE wood fiber board (F8.6)		PLM ☐	TEM ☐
A BC	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.1	Dry Wall system (G.C./DW)		PLM ☐	TEM ☐
	TAPE) ↓ ↓		PLM ☐	TEM ☐
ABC			PLM ☐	TEM ☐
		(M1.2)	PLM ☐	TEM ☐
M1.2 / M21.1	Brown wood fiber board wall panels w/		PLM ☐	TEM ☐
M20.1	Yellow mastic (M20.1) + Textile		PLM ☐	TEM ☐
	Wall covering (M21.1)		PLM ☐	TEM ☐
ABC	↓ ↓ ↓			

COMPANY CONTACT INFORMATION

Company: GEM Environmental, Inc.

Job Contact: Christopher Casas

Project Name:

Project ID #:

Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
			PLM	TEM
M6.1	2x4 Fiberglass ceiling		☐	☐
	Panels w/ heavy face		☐	☐
	Covering		☐	☐
A, B, C	↓ ↓ ↓		☐	☐
			☐	☐
			☐	☐
M6.2	2x4 white synthetic		☐	☐
	ceiling tiles w/ fissures +		☐	☐
	pinholes, (M6.2)		☐	☐
A, B, C	↓ ↓ ↓		☐	☐
			☐	☐
M10.1	Plaster white skim		☐	☐
	coat over light gray		☐	☐
	base coat		☐	☐
A, B, C, D, E	↓ ↓ ↓		☐	☐
			☐	☐
M1.3/S3.3	Drywall system (JC/Tape/DW)		☐	☐
	(M1.3) + LACE texture		☐	☐
	(S3.3) ↓ ↓ ↓		☐	☐
A B C	↓ ↓ ↓		☐	☐
			☐	☐
S4.1	Popcorn ceiling texture		☐	☐
A B C	↓ ↓ ↓		☐	☐
			☐	☐
M5.3	Thin High Density wood		☐	☐
	Fiber Board Acoustical		☐	☐
	Panels ↓ ↓ ↓		☐	☐
A B C	↓ ↓ ↓		☐	☐

All samples collected on 05.21.26

SAMPLING FORM

CEI

COMPANY CONTACT INFORMATION

Company: GEM Environmental, Inc.

Job Contact: Christopher Casas

Project Name:

Project ID #:

Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
M1.4/33.4	Drywall system (JC tape, DW)		PLM ☐	TEM ☐
	M1.4 to spawled on		PLM ☐	TEM ☐
	Texture (33.4)		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.5/33.5	Drywall system (JC tape, DW)		PLM ☐	TEM ☐
	M1.5 + textured on texture (33.5)		PLM ☐	TEM ☐
A, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
R4.1	FLAT BOILT UP Roof:		PLM ☐	TEM ☐
	Wood Fiber Board w/ TAR		PLM ☐	TEM ☐
	Paper Rolled TAR over		PLM ☐	TEM ☐
	Black TAR on Decking.		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
R5.1/28.1	Blue Asph/Flt Shingles 25.1		PLM ☐	TEM ☐
	over TAR Paper (28.1)		PLM ☐	TEM ☐
4, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T10.1	Loose Fill White Fiber		PLM ☐	TEM ☐
	glass Insulation		PLM ☐	TEM ☐
A, B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T5.1	White Vinyl Wrap +		PLM ☐	TEM ☐
	Pink Fiberglass Duct Run		PLM ☐	TEM ☐
A B/C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

COMPANY CONTACT INFORMATION	
Company: GEM Environmental, Inc.	Job Contact: Christopher Casas
Project Name:	
Project ID #:	Tel: 406-370-4139

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
T5.2	Gray VINYL wrap, yellow FIBerglass INSULATION, Doet		PLM ☐	TEM ☐
	Roofs ↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M21.2	PAPER Based Wall Covering, weave pattern		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
T14.1	ALUMINUM Bunked FIBER GLASS INSULATION w/ BLACK ADHESIVE		PLM ☐	TEM ☐
	↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M1.6	WOOD FIBER Board panels		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
F11.1	Insulation w/ Black BACKING + Brown MASTIC VINYL surface, beige/brown STREAKS		PLM ☐	TEM ☐
	↓ ↓ ↓		PLM ☐	TEM ☐
A, B, C			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
M21.3	w Beige Wall paper w/ Floral Pattern		PLM ☐	TEM ☐
A, B, C	↓ ↓ ↓		PLM ☐	TEM ☐
			PLM ☐	TEM ☐
REMOVE S4.2	Light Blush no Texture (S4.1) over (M10.1)		PLM ☐	TEM ☐

A, B, C
M10.1 F, G, H



Exhibit A

APPENDIX A.2 XRF ANALYSIS

XRF Calibration Readings PRE - AND - POST INSPECTION CALIBRATION SUMMARY

Reading Number	Time & Date	PBC	(+/-) Error	Average	Difference Between Average and NIST SRM
----------------	-------------	-----	-------------	---------	---

Initial Calibration Series

5598	5/20/2026 22:23	0.8	0.1	0.90	-0.02
5599	5/20/2026 22:23	1	0.1		
5600	5/20/2026 22:23	1	0.1		
NIST SRM 2573: Red Paint Film		Calibration Check Tolerance: 0.8 to 1.02 mg/CM^2			
5602	5/20/2026 22:24	0	0.1	0	-0.1
5603	5/20/2026 22:24	0	0.1		
5604	5/20/2026 22:24	0	0.1		
NIST SRM 2571: White Paint Film		Calibration Check Tolerance: < 0.1			

Secondary Calibration Series

5621	5/20/2026 22:35	1	0.1	1.00	-0.02
5622	5/20/2026 22:36	1	0.1		
5623	5/20/2026 22:36	1	0.1		
NIST SRM 2573: Red Paint Film		Calibration Check Tolerance: 0.8 to 1.02 mg/CM^2			
5625	5/20/2026 22:36	0	0.1	0	-0.1
5626	5/20/2026 22:36	0	0.1		
5627	5/20/2026 22:36	0	0.1		
NIST SRM 2571: White Paint Film		Calibration Check Tolerance: < 0.1			

CALIBRATION RESULTS SUMMARY:

All pre- and post-calibration readings were within the manufacturer-specified tolerance limits per the attached PCS.
Average calibration reading deviation was within acceptable range (no readings exceeded tolerance).
Instrument passed all performance checks and was deemed reliable for use during the inspection.
Full raw calibration data (individual shots, timestamps, and readings) is provided below.

NOTES:

1. ASI Standards Lead in Paint on Film Block reference material 1.0 mg/cm² was used, SKU PbBlock1, which complies with the EPA & HUD regulations and is traceable to NIST SRM 2574
2. Purpose of Calibration Checks: Daily pre- and post-inspection calibrations were performed to verify proper instrument function, energy calibration, and detector resolution per manufacturer specifications and the SciAps X-550 Performance Characteristic Sheet (PCS). All checks were conducted in accordance with HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Revision, Chapter 7) and EPA-recognized protocols for XRF use in lead paint testing.
3. Calibration checks are administrative and confirm instrument accuracy before and after field use. All field XRF readings used in this report (Table 2) were collected with a properly calibrated instrument. Complete raw XRF field data, including timestamps, substrate corrections, and individual readings, is provided in the subsequent section of Appendix A.
4. SciAps PB-X550, Serial Number 32545. was used during this inspection.

[illegible]

ASI Standards Lead in Paint on Film Block reference material 1.0 mg/cm2 was used, SKU PbBlock1, which complies with the EPA & HUD regulations and is traceable to NIST SRM 2574

Appendix A: Complete XRF Instrument Dataset

This appendix contains the full raw data export from the SciAps X-550 analyzer (June 26, 2025). All readings correspond to sample IDs listed in Table 2 (worst-case/highest value per homogeneous area reported) and locations shown in Figure 1. Material component, substrate, and side details are provided in Table 2 for each HA. Data includes timestamps, substrate corrections, and instrument performance details. The conservative "worst-case" approach was applied per HUD Guidelines (2012 Revision) and professional judgment. Full traceability is provided for verification.

[illegible]

Exhibit A

[illegible]



Exhibit A

APPENDIX A.3 TEAR SHEET



Asbestos & Lead Inspection Tear Sheet

Exhibit A

SITE

Missoula Youth Court		
Building Name /Site 311 Woody Ave. Missoula MT		
Address	City	State
Scope of Work The scope of work for this project included a limited hazardous building materials inspection of the readily and safely accessible portions of the project area. The inspection encompassed a thorough visual assessment, bulk sampling, and documentation of the following materials: • Asbestos-Containing Materials (ACM) – including suspect building materials such as surfacing materials, thermal system insulation, roofing materials, floor coverings, mastics, and miscellaneous sealants/gaskets. • Lead-Containing Paint/Coatings (LCP/LBP) – on painted and varnished building components. The primary purpose of this inspection was to identify and document the locations, types, and estimated quantities of regulated hazardous building materials present in the project area. This report provides a current, time-specific snapshot of identified materials to support regulatory compliance and planned construction activities. Suspect materials were identified and grouped into homogeneous areas where applicable, with findings delineated by functional space (e.g., offices, garage, warehouse, and attic) to enable precise mapping and documentation. Bulk samples for asbestos were collected from representative homogeneous areas using discreet, wet methods with immediate repairs to prevent fiber release. Samples were submitted under chain-of-custody to an NVLAP-accredited laboratory for polarized light microscopy (PLM) analysis. XRF testing for lead was performed using a SciAps X-550 analyzer in accordance with HUD Guidelines (2012 Revision) and EPA-recognized protocols.		

SAMPLING INFORMATION

Date of Inspection: 05.20.26 Date of Report: 07.06.26

GEM Environmental Inc. Project ID: 25.057

Is Asbestos Detected: ☒ Yes ☐ No

Is Regulated Asbestos Containing Material Present: **RACM Present, None anticipated for removal**

ASBESTOS INSPECTOR

Christopher Casas, I.H. MTA-4459; Exp. 12.12.26



Exhibit A

Asbestos & Lead Inspection Tear Sheet

SITE

Missoula Youth Court		
Building Name /Site 311 Woody Ave. Missoula MT		
Address	City	State
Scope of Work The scope of work for this project included a limited hazardous building materials inspection of the readily and safely accessible portions of the project area. The inspection encompassed a thorough visual assessment, bulk sampling, and documentation of the following materials: • Asbestos-Containing Materials (ACM) – including suspect building materials such as surfacing materials, thermal system insulation, roofing materials, floor coverings, mastics, and miscellaneous sealants/gaskets. • Lead-Containing Paint/Coatings (LCP/LBP) – on painted and varnished building components. The primary purpose of this inspection was to identify and document the locations, types, and estimated quantities of regulated hazardous building materials present in the project area. This report provides a current, time-specific snapshot of identified materials to support regulatory compliance and planned construction activities. Suspect materials were identified and grouped into homogeneous areas where applicable, with findings delineated by functional space (e.g., offices, garage, warehouse, and attic) to enable precise mapping and documentation. Bulk samples for asbestos were collected from representative homogeneous areas using discreet, wet methods with immediate repairs to prevent fiber release. Samples were submitted under chain-of-custody to an NVLAP-accredited laboratory for polarized light microscopy (PLM) analysis. XRF testing for lead was performed using a SciAps X-550 analyzer in accordance with HUD Guidelines (2012 Revision) and EPA-recognized protocols.		

SAMPLING INFORMATION

Date of Inspection: 05.20.26

Date of Report: 07.06.26

GEM Environmental Inc. Project ID: 25.057

Is Asbestos Detected: ☒ Yes ☐ No

Is Regulated Asbestos Containing Material Present: **RACM Present, None anticipated for removal**

ASBESTOS INSPECTOR

Christopher Casas, I.H. MTA-4459; Exp. 12.12.26



Asbestos & Lead Inspection Tear Sheet

Exhibit A



Exhibit A

APPENDIX B
ASBESTOS & LEAD REGULATORY CONSIDERATIONS



Exhibit A

Appendix B: Regulatory Considerations

This inspection and the resulting recommendations were conducted and prepared in accordance with key federal and Montana state regulations governing asbestos-containing materials (ACM), lead-containing paint (LCP), and associated waste management. The following provides a comprehensive yet practical summary of the regulatory framework relevant to the planned renovation and demolition activities at the project area.

Asbestos Regulations: Asbestos-containing materials (ACM) are defined as building materials containing greater than 1% asbestos by polarized light microscopy (PLM) analysis (EPA Method 600/R-93/116). Friable ACM, or non-friable ACM rendered friable during disturbance, is classified as Regulated Asbestos-Containing Material (RACM) under the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Part 61, Subpart M), fully adopted by Montana through ARM 17.74. Non-friable ACM is categorized as:

- Category I: Resilient flooring, roofing felts, mastics, gaskets, and packings.
- Category II: Transite panels, cementitious shingles, and similar brittle products.

RACM triggers mandatory notification to Montana DEQ at least 10 working days prior to disturbance for quantities ≥ 10 ft², ≥ 3 linear feet, or ≥ 3 cubic feet (Montana thresholds are more stringent than federal). Requirements include use of Montana-accredited inspectors, project designers, contractors/supervisors, and workers; wet methods; containment; no visible emissions; competent person oversight; and proper waste packaging, labeling, transportation, and disposal at licensed landfills.

The Asbestos Hazard Emergency Response Act (AHERA, 40 CFR Part 763, Subpart E) inspection, homogeneous area delineation, and assessment protocols were followed, representing best practice for non-school facilities. Worker protection is governed by OSHA Asbestos Standards (29 CFR 1926.1101 for construction; 1910.1001 for general industry), including a permissible exposure limit of 0.1 fibers/cc (8-hour TWA), excursion limit of 1.0 f/cc (30 minutes), mandatory training, respiratory protection, hygiene facilities, exposure monitoring, and medical surveillance.

See the OSHA Construction subsection below for detailed requirements during renovation, demolition, repair, maintenance, or alteration activities.

OSHA Asbestos Standard for Construction (29 CFR 1926.1101) Worker protection during renovation, demolition, repair, maintenance, or alteration activities involving disturbance of ACM/PACM is governed by the OSHA Asbestos Standard for Construction (29 CFR 1926.1101). This standard applies to all such construction operations and requires:

- A permissible exposure limit (PEL) of 0.1 f/cc (8-hour TWA) and excursion limit of 1.0 f/cc (30 minutes).
- Classification of work into four classes (I–IV) based on material type and disturbance level, with tailored engineering controls, work practices, and supervision by a competent person (trained per EPA Model Accreditation Plan or equivalent for higher classes).
- Establishment of regulated areas with restricted access, signage, and decontamination procedures.



Exhibit A

Appendix B: Regulatory Considerations

- Initial exposure assessments (negative or monitoring), respiratory protection, protective clothing, hygiene facilities, and medical surveillance for affected workers.
- Training (annual, class-specific) on hazards, controls, and safe practices.
- Notification and coordination on multi-employer sites.

These requirements ensure exposures are minimized through engineering controls and proper PPE, with emphasis on presumed ACM in pre-1981 buildings. Compliance with 1926.1101 aligns with and supplements EPA NESHAP and Montana DEQ rules.

Lead Regulations: Lead-based paint (LBP) is defined by HUD/EPA as paint or coatings containing ≥ 1.0 mg/cm² lead (or $\geq 0.5\%$ by weight). For renovation activities disturbing painted surfaces in pre-1978 structures, the EPA Renovation, Repair, and Painting (RRP) Rule (40 CFR Part 745) requires EPA-certified firms and renovators, occupant notification ("Renovate Right" pamphlet), work area containment, prohibited practices (e.g., open-flame burning, uncontrolled power sanding), HEPA cleanup, and cleaning verification.

OSHA Lead in Construction Standard (29 CFR 1926.62) applies to any disturbance of LCP/LBP, requiring initial exposure assessment (or objective data), engineering/administrative controls, PPE (including respirators per 29 CFR 1910.134), hygiene facilities, worker training, and medical surveillance if exposures exceed the action level (30 $\mu\text{g}/\text{m}^3$) or permissible exposure limit (50 $\mu\text{g}/\text{m}^3$, 8-hour TWA).

Waste Management: Demolition/renovation debris containing ACM or LCP requires proper characterization. In Montana, waste with any detectable asbestos is classified as special waste requiring specific handling, manifesting, and disposal at approved landfills (Class II for friable/RACM; Class IV for intact non-friable with restrictions). Lead-containing waste is hazardous (D008 characteristic) under RCRA if leachable lead exceeds 5.0 mg/L via Toxicity Characteristic Leaching Procedure (TCLP, 40 CFR 261.24). A conservative total lead screening (100 mg/kg rule-of-thumb) was applied in this report to evaluate the likelihood of D008 classification for composite waste streams.

Compliance with these regulations protects worker and occupant health, prevents environmental release, and avoids enforcement actions. Recommendations in this report are designed to facilitate full compliance during planned activities, including accredited professional engagement, notification, safe work practices, monitoring, and waste characterization.



Exhibit A

Appendix B: Regulatory Considerations

Category	Key Regulation	Applicability / Triggers	Key Limits / Requirements	Notification / Permits	Worker Protection / Controls	Training / Surveillance
Asbestos - General	EPA NESHAP (40 CFR Part 61, Subpart M)	Demolition or renovation disturbing RACM (friable or rendered friable) $\geq$ thresholds (federal: 260 lin ft / 160 sq ft / 35 cu ft; Montana stricter: ≥ 10 ft ² / 3 lin ft / 3 cu ft)	ACM $>1\%$ by PLM; Categories I/II non-friable; Wet methods, no visible emissions, containment	Montana DEQ: 10 working days prior for regulated projects	Engineering controls (HEPA, negative pressure), competent person, proper waste handling	Montana-accredited personnel; AHERA protocols as best practice
Asbestos - Worker Protection	OSHA Asbestos in Construction (29 CFR 1926.1101)	Renovation, demolition, repair, maintenance disturbing ACM/PACM	PEL: 0.1 f/cc (8-hr TWA); Excursion: 1.0 f/cc (30 min); PACM presumption in pre-1981 buildings	N/A (but multi-employer coordination required)	Classes I-IV work; Regulated areas, respirators, protective clothing, decontamination, hygiene facilities	Annual/class-specific; Competent person (EPA MAP equivalent for higher classes); Medical surveillance if exposed ≥ 30 days/year
Asbestos - General Industry	OSHA Asbestos (29 CFR 1910.1001)	Non-construction activities (supplements 1926.1101)	Same PEL/excursion limits as above	N/A	Exposure monitoring, PPE, hygiene	Similar to 1926.1101; Medical surveillance
Lead	EPA RRP Rule (40 CFR Part 745)	Pre-1978 structures; Disturbing painted surfaces in renovation	LBP ≥ 1.0 mg/cm ² or $\geq 0.5\%$ by weight	Occupant notification ("Renovate Right" pamphlet)	Certified firms/renovators; Containment, prohibited practices (no open-flame, uncontrolled sanding), HEPA cleanup	EPA-certified renovators
Lead - Worker Protection	OSHA Lead in Construction (29 CFR 1926.62)	Any disturbance of LBP/LCP	Action level: 30 $\mu\text{g}/\text{m}^3$; PEL: 50 $\mu\text{g}/\text{m}^3$ (8-hr TWA)	N/A	Initial assessment, engineering controls, PPE/respirators, hygiene facilities	Worker training; Medical surveillance if above action level
Waste Management	Montana special waste; RCRA (for lead)	ACM/RACM or lead-containing debris	Asbestos: Special waste (Class II/IV landfills); Lead: Hazardous (D008) if TCLP >5.0 mg/L	Proper manifesting/transport to approved facilities	Characterization (TCLP for lead), conservative screening (100 mg/kg total lead)	N/A



Exhibit A

APPENDIX C

DOCUMENTATION OF TRAINING AND ACCREDITATION

Exhibit A

CERTIFICATE OF TRAINING

CHRISTOPHER E CASAS

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

MTA-4459

Asbestos Inspector
Management Planner
Project Contractor/Supervisor
Project Designer

12/12/2026
10/31/2026
12/05/2026
10/29/2026

MT DEQ Asbestos Control Program

*Northern Industrial Hygiene, Inc.
Certifies that*

Chris Casas

201 N Russel Street #6
Missoula, MT 59801

Has received and successfully passed the examination for

Inspector Refresher Training

**For the purpose of accreditation as required under Section 17.74.315 of the Administrative Rules of Montana
And Section 206 of Title II of the Toxic Substance Control Act (TSCA)**

Course Date(s): 12/12/2025 Expiration Date: 12/13/2026

Location: Online Training

Certification #IR25L12-010

Mark Stoltz

Instructor

12/12/2025

Date

Northern Industrial Hygiene, Inc. 201 South 30th Street Billings, Montana 59101 (406) 245-7766

*This Course has been approved by the Montana Asbestos Control Program
1520 E 6th Ave, Helena, Montana 59601*

United States Environmental Protection Agency

This is to certify that



Christopher E Casas

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 18, 2026

LBP-I-1148223-1

Certification #

October 04, 2023

Issued On



Adrienne Priselac, Manager, Toxics Office

Land Division



Exhibit A

APPENDIX D PHOTO LOG
