



201 South 30th Street  
Billings, Montana 59101  
Phone: 406/245-7766  
FAX: 406/254-1428

November 22, 2021

Mr. James Matteson  
Yellowstone County Purchasing  
PO Box 35015  
Billings, MT 59107

RE: Supplemental Asbestos Sampling  
Miller Building  
301 North 29<sup>th</sup> Street / 2823 3<sup>rd</sup> Avenue North  
Billings, Montana  
Northern Project Number 182-057A

---

Dear Mr. Matteson:

This letter presents the laboratory analytical results of samples of suspect asbestos-containing materials (ACMs) that were collected by Northern Industrial Hygiene, Inc. (Northern) from the 3<sup>rd</sup> Floor Vault of the Miller Building.

On November 5, 2021, Robert Brownell, a Montana accredited asbestos inspector, travelled to the Miller Building and collected four samples of suspect concrete masonry unit (CMU) block from the 3<sup>rd</sup> Floor Vault. The samples were collected due to asbestos being detected in one of three samples collected from the CMU block as reported in Northern's asbestos survey report for the Miller Building dated August 13, 2021. CMU block do not normally contain asbestos and Northern suspects the positive result of the previous survey to be due to contamination of the sample.

The samples were submitted under chain-of-custody procedures to EMSL Analytical, Inc. (EMSL) of Phoenix, Arizona for analysis by Polarized Light Microscopy (PLM) methods. EMSL is accredited for PLM analysis by the National Voluntary Laboratory Accreditation Program (NVLAP) (NVLAP Laboratory No. 200811-0).

The laboratory analytical results indicate that **asbestos was not detected** in the samples analyzed. Based on the results of this sampling, Northern considers the CMU block and the (previously sampled) associated mortar to be non-ACM.

Attached you will find the laboratory analytical results and chain-of-custody for the samples collected and analyzed for this report.

Mr. James Matteson  
Supplemental Asbestos Sampling  
Miller Building  
Billings, Montana  
November 22, 2021  
Page 2

Northern recommends that you maintain a copy of this supplemental asbestos sampling letter report with the original Miller Building Limited Asbestos Survey Report dated August 13, 2021 for your records.

If you have any questions concerning this letter or if we can be of additional assistance, please contact us at (406) 245-7766.

Respectfully submitted,

NORTHERN INDUSTRIAL HYGIENE, INC.



Robert B. Brownell,  
MTA-3542 IN  
Expiration: 12/16/2021

Attachments: Laboratory Analytical Results  
Chain-of-Custody  
State of Montana Credentials  
Invoice



# EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077

Tel/Fax: (800) 220-3675 / (856) 786-5974

<http://www.EMSL.com> / [cinnasblab@EMSL.com](mailto:cinnasblab@EMSL.com)

EMSL Order: 042128069

Customer ID: NIHI62

Customer PO:

Project ID:

**Attention:** Robert Brownell  
Northern Industrial Hygiene, Inc.  
201 South 30th Street  
Billings, MT 59101

**Phone:** (406) 245-7766

**Fax:** (406) 254-1428

**Received Date:** 11/09/2021 9:30 AM

**Analysis Date:** 11/11/2021

**Collected Date:** 11/05/2021

**Project:** Miller Building / 182-057A

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

| Sample                                  | Description                          | Appearance                         | Non-Asbestos |                          | Asbestos      |
|---|--------------------------------------|------------------------------------|--------------|--------------------------|---------------|
|   |                                      |                                    | % Fibrous    | % Non-Fibrous            | % Type        |
| M17.1A<br><small>042128069-0001</small> | Room 313 - NE<br>Corner - CMU Block  | Gray<br>Non-Fibrous<br>Homogeneous |              | 100% Non-fibrous (Other) | None Detected |
| M17.1B<br><small>042128069-0002</small> | Room 313 - East Wall<br>- CMU Block  | Gray<br>Non-Fibrous<br>Homogeneous |              | 100% Non-fibrous (Other) | None Detected |
| M17.1C<br><small>042128069-0003</small> | Room 313 - South<br>Wall - CMU Block | Gray<br>Non-Fibrous<br>Homogeneous |              | 100% Non-fibrous (Other) | None Detected |
| M17.1D<br><small>042128069-0004</small> | Room 313 - West<br>Wall - CMU Block  | Gray<br>Non-Fibrous<br>Homogeneous |              | 100% Non-fibrous (Other) | None Detected |

Analyst(s)

Andrew Borsos (3)

John Witcraft (1)

Samantha Rundstrom, Laboratory Manager  
or Other Approved Signatory

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

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NJ DEP 03036, PA ID# 68-00367, LA #04127

Initial report from: 11/11/2021 18:18:51



EMSL ANALYTICAL, INC.  
LABORATORY • PRODUCTS • TRAINING

# Asbestos Bulk Building Material Chain of Custody

EMSL Order Number (Lab Use Only):

042128069

EMSL ANALYTICAL, INC.  
3356 W. CATALINA DRIVE  
PHOENIX, AZ 85017

PHONE: 602-276-4344  
FAX: 602-276-4053

|   |                    |   |                 |
|---|--------------------|---|-----------------|
| Company : Northern Industrial Hygiene           |                    | EMSL-Bill to: <input type="checkbox"/> Same <input type="checkbox"/> Different<br>If Bill to is Different note instructions in Comments** |                 |
| Street: 201 South 30 <sup>th</sup> Street       |                    | Third Party Billing requires written authorization from third party   |                 |
| City: Billings                                  | State/Province: MT | Zip/Postal Code: 59101  | Country: USA    |
| Report To (Name): Robert Brownell               |                    | Telephone #: 406.245.7766   |                 |
| Email Address: RBROWNELL@NORTHERNIH.COM         |                    | Fax #: 406.254.1428   | Purchase Order: |
| Project Name/Number: Miller Building / 182-057A |                    | Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email  |                 |
| U.S. State Samples Taken: MT                    |                    | CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt                                   |                 |

Turnaround Time (TAT) Options\* – Please Check

3 Hour   
  6 Hour   
  24 Hour   
  48 Hour   
  72 Hour   
  96 Hour   
  1 Week   
  2 Week

\*For TEM Air 3 hr through 6 hr, please call ahead to schedule. \*There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

|   |   |  |  |
|---|---|--|--|
| <b>PLM - Bulk (reporting limit)</b>   |   | <b>TEM - Bulk</b>  |  |
| <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)  | <input type="checkbox"/> TEM EPA NOB – EPA 600/R-93/116 Section 2.5.5.1   | <input type="checkbox"/> NY ELAP Method 198.4 (TEM)                    | <input type="checkbox"/> Chatfield Protocol (semi-quantitative)        |
| <input type="checkbox"/> PLM EPA NOB (<1%)  | <input type="checkbox"/> TEM % by Mass – EPA 600/R-93/116 Section 2.5.5.2 | <input type="checkbox"/> TEM Qualitative via Filtration Prep Technique | <input type="checkbox"/> TEM Qualitative via Drop Mount Prep Technique |
| Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)               |   | <b>Other</b>   |  |
| Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) |   | <input type="checkbox"/>   |  |
| <input type="checkbox"/> NIOSH 9002 (<1%)   |   |  |  |
| <input type="checkbox"/> NY ELAP Method 198.1 (friable in NY)   |   |  |  |
| <input type="checkbox"/> NY ELAP Method 198.6 NOB (non-friable-NY)                                    |   |  |  |
| <input type="checkbox"/> OSHA ID-191 Modified   |   |  |  |
| <input type="checkbox"/> Standard Addition Method   |   |  |  |

RECEIVED  
 EMSL  
 CHINAMISON, N.J.  
 2017 NOV - 9 AM 1:14

Check For Positive Stop – Clearly Identify Homogenous Group      Date Sampled: 11/5/21

Samplers Name: Robert Brownell      Samplers Signature: *Robert Brownell*

| Sample # | HA # | Material Description | Sample Location     |
|----------|------|----------------------|---------------------|
| M17.1A   |      | CMU Block            | Rm 313 - NE Corner  |
| M17.1B   |      | ↓                    | Rm 313 - East Wall  |
| M17.1C   |      |                      | Rm 313 - South Wall |
| M17.1D   |      |                      | Rm 313 - West Wall  |
|          |      |                      |                     |
|          |      |                      |                     |
|          |      |                      |                     |
|          |      |                      |                     |
|          |      |                      |                     |

Client Sample # (s): M17.1A - M17.1D      Total # of Samples: 4

Relinquished (Client): *Robert Brownell*      Date: 11/6/21      Time: 17:00

Received (Lab): *AMB-fx*      Date: 11-9-21      Time: 9:30A

Comments/Special Instructions:

4/11

**ROBERT B BROWNELL**

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-3542**

|                               |            |
|-------------------------------|------------|
| Asbestos Inspector            | 12/16/2021 |
| Management Planner            | 12/16/2021 |
| Project Contractor/Supervisor | 12/17/2021 |
| Project Designer              | 12/18/2021 |

MT DEQ Asbestos Control Program