



April 10, 2015

Cynthia M. Carlson Heins  
Planning and Economic Development  
1100 City Hall Annex, 25 West 4th Street  
Saint Paul, MN 55102

**Subject: Hazardous Materials Survey (Update)**  
216/218 Bates Avenue  
St. Paul, Minnesota

Dear Cindy:

St. Croix Environmental, Inc. (SCE) was retained by the City of St. Paul (the City) to administer an update to an existing Hazardous Materials Survey for the property located at 216/218 Bates Avenue in St. Paul, Minnesota (the Site). The purpose of the update was to bring the existing survey, which was done in support of a remodeling project, up to the standard required for demolition.

Greg Myers, a Minnesota Licensed Asbestos Inspector (A12289), conducted the inspection on March 26, 2015. The findings are included in the attached Midwest Environmental Consulting (MEC), LLC "Pre-Demolition Inspection, Site Evaluation Supplementary Report".

Thank you for the opportunity to assist you with this project. Please let me know if you have any questions or if you need any additional information.

Sincerely,  
**St. Croix Environmental, Inc.**

A handwritten signature in black ink, appearing to read "jill", is placed over a rectangular area.

Kevin J. Miller, C.P.G.  
Senior Project Manager



**ASBESTOS AND POSSIBLE  
ENVIRONMENTAL HAZARD  
PRE DEMOLITION INSPECTION  
SITE EVALUATION  
SUPPLEMENTARY REPORT**

**Commercial/Residential Property  
216/218 Bates Avenue  
St. Paul, Minnesota**

**PREPARED FOR:**

**Kevin Miller  
St. Croix Environmental  
1094 Golden Oaks Drive  
Hudson WI 54016**

**Phone: 715-381-5701**

**INSPECTION DATE:**

**March 26, 2015**

**INSPECTED BY:**

**Greg A. Myers  
Midwest Environmental Consulting, L.L.C.  
125 Railroad Avenue SW  
Mora, Minnesota 55051  
Phone: (320) 679-4054  
Fax: (320) 679-4442**

**MEC PROJECT NUMBER: 856/0315A**

**REPORT DATE: April 7, 2015**

**PRE-DEMOLITION  
INSPECTION PROFILE  
SUPPLEMENTAL REPORT**

**Commercial/Residential Property  
216/218 Bates Avenue  
St. Paul, Minnesota**

**INTRODUCTION**

Midwest Environmental Consulting, L.L.C. (MEC) staff conducted an inspection of the commercial/residential property located at 216/218 Bates Avenue, St. Paul, Minnesota, at the request of Kevin Miller, St. Croix Environmental. The purpose of the inspection was to identify possible environmental hazards and suspect building materials that may contain asbestos and collect the minimum number of samples for asbestos analysis prior to the demolition of the structure which were not identified in the original site evaluation conducted in May of 2012. Greg A. Myers, a trained and Minnesota Licensed Asbestos Inspector (AI# 2289) performed all the evaluation services for this project.

Samples of potentially asbestos-containing materials have been collected and analyzed following preferred Environmental Protection Agency (EPA) analytical procedures. The laboratory providing the analysis for the project is CEI Labs, Cary, North Carolina, NVLAP accreditation number 101768-0. Samples were analyzed by Polarized Light Microscopy (PLM), the EPA-approved analytical method for bulk analysis.

The purpose of the inspection was to determine if asbestos containing materials are present in the structures prior to demolition and if other potential environmental hazards are present which will require removal prior to the demolition.

**ASBESTOS SAMPLING**

The following suspect asbestos-containing samples were collected during the limited asbestos inspection, and submitted to CEI Labs, Cary, North Carolina for analysis.

<b>Event Sample # Date</b>	<b>Sample Location/ Material</b>	<b>Asbestos Concentration/ Type</b>	<b>Non-Asbestos Content</b>	<b>Approximate Amount</b>
1 856/0315A-B1 3/26/15	Exterior, grey flashing sealant under aluminum siding	5% Chrysotile	95% binder	Scattered throughout
2 856/0315A-B2 3/26/15	Apt. 216, Attic, black mastic on Kraft paper	None detected in all layers	2% cellulose 3% fiberglass 95% mastic 100% cellulose	Throughout attic

The random samples collected from areas within the complex, were found to contain asbestos in the exterior grey flashing sealant under aluminum siding.

## **POTENTIAL ENVIRONMENTAL HAZARDS**

MEC observed other potential environmental hazards, including:

### Unit 216 Bates

- 1 box taping compound
- 2 gallons latex paint
- 1 – 2 pint water sealant
- 1 mercury vapor bulb
- 2 fluorescent light fixture (4ft + 4 bulbs)
- 1 parlor gas stove
- 1 gas range top
- 1 refrigerator
- 2 tables
- 1 set of bench seats & cushions
- 1 chair
- 1 broiler oven
- 1 ½ gallon paint
- 1 smoke alarm
- 1 electric base board heater
- 1 high intensity light fixture

### Unit 218 Bates

- AC unit
- Fluorescent light fixtures (3 4ft & 6 bulbs)
- 16 8ft fluorescent light bulbs
- 8 8ft fluorescent light fixtures
- 1 circular fluorescent light bulb
- 1 fire extinguisher
- 2 desks
- 2 chairs
- Miscellaneous trash
- Large silver/griddle industrial cleaner
- 2 containers of epoxy
- 2 gallon muriatic acid
- 1 gallon latex paint
- 1 gallon taping compound
- 2 mercury thermostats
- 2 ceiling mount heaters
- 1 tire
- 1 gallon bleach
- 1 water softener
- 2 hot water heaters

- Miscellaneous material in the basement (not safely accessible)

When demolishing a building, trash and non-construction debris (furniture and appliances) must be removed prior to the demolition. These items are not demolition debris.

## RECOMMENDATIONS

It was MEC's understanding that the building complex is to be demolished. The contractor performing the work activities is required to remove the asbestos-containing materials prior to the demolition or burning of the structure. Also, appliances, electronics, hazardous materials and any non-construction items should be removed or recycled or disposed of as hazardous waste. Any items that are not part of the structure should be separated and properly disposed of as non-demolition debris.

## SUMMARY

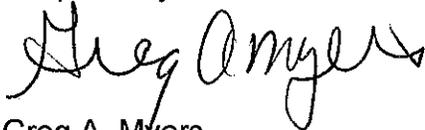
The survey and analysis of the limited samples collected indicated that asbestos is present within the suspected materials identified including the exterior grey flashing sealant under aluminum. (please note that asbestos had previously been identified in the May 10, 2012 report for this property in the south roof flashing.)

Appliances, electronics, chemicals, paints, and mercury switches within the complex are required to be removed and recycled, or disposed of as hazardous waste or disposed of as non-demolition debris. Material not considered construction debris and hazardous waste will be required to be removed prior to demolition.

Please provide a copy of the survey information to the contractor(s) scheduled to perform the demolition.

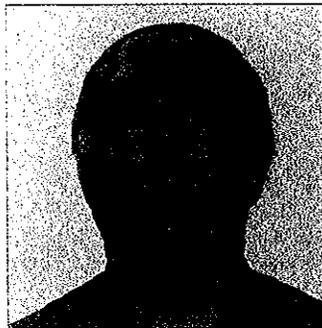
It has been our pleasure to provide this service to you and your organization. If you have any questions, or need further information, please do not hesitate to contact me directly.

Respectfully,



Greg A. Myers  
Environmental Services Director

**APPENDIX A**  
**INSPECTOR QUALIFICATIONS**



*Greg A. Myers*  
Director, Env. Health Div.



**ASBESTOS  
INSPECTOR**

Certified by:  
State of Minnesota  
Department of Health

**Expires: 07/07/2015**

Greg A Myers  
19667 Salmonson River Rd  
Mora, MN 55051

No. A12289

Issued: 07/17/2014

Expiration Date: July 7, 2015

Certificate No: 5LM07071405IR

This is to certify that

**Greg A. Myers**

has attended and successfully completed an

**ASBESTOS INSPECTOR  
REFRESHER TRAINING COURSE**

permitted by

the State of Minnesota under Minnesota Rules 4620.3702 to 4620.3722

and meets the requirements of

Section 206 of Title II of the Toxic Substances Control Act (TSCA)

conducted by

**Lake States Environmental, Ltd.**

White Bear Lake, MN on July 7, 2014

Examination Date: July 7, 2014

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

*Paul D. McNeill*  
Training Inspector

**Ohio University**

**Greg Myers**

Has attended and satisfactorily passed  
an examination covering the contents of the course:

**“Asbestos Abatement  
for Inspectors”**

conducted by the

**Asbestos Information Center  
Center for Environmental Management**

8801-03-032  
Certificate Number

January 25-27, 1988  
Date of Course

January 27, 1989  
Expiration Date



*Shirley Cole*  
Training and Education Coordinator

*Anthony D. Costen*  
Director  
Center for Environmental Management

**APPENDIX B**

**ASBESTOS  
LABORATORY RESULTS  
CHAIN-OF-CUSTODY**



---

**ASBESTOS ANALYTICAL REPORT**  
**By: Polarized Light Microscopy**

Prepared for

**Midwest Environmental Consulting, L.L.C.**

---

CLIENT PROJECT: 856/0315A; St. Croix Environmental & City of St. Paul;  
216 & 218 Bates Ave, St. Paul, MN

CEI LAB CODE: A15-3030

TEST METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 03/31/15

TOTAL SAMPLES ANALYZED: 2

# SAMPLES >1% ASBESTOS: 1

**TEL: 866-481-1412**

*[www.ceilabs.com](http://www.ceilabs.com)*



# Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

**PROJECT:** 856/0315A; St. Croix Environmental & City of St. Paul; 216 & 218 Bates Ave, St. Paul, MN **CEI LAB CODE:** A15-3030

**METHOD:** EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
856/0315A-B1		A1940812	Gray	Sealant	Chrysotile 5%
856/0315A-B2	Layer 1	A1940813	Black	Mastic	None Detected
	Layer 2	A1940813	Brown	Paper	None Detected



# ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

**Client:** Midwest Environmental Consulting, L.L.C.  
 125 Railroad Avenue SW  
 Mora, MN 55051

**CEI Lab Code:** A15-3030  
**Date Received:** 03-30-15  
**Date Analyzed:** 03-31-15  
**Date Reported:** 03-31-15

**Project:** 856/0315A; St. Croix Environmental & City of St. Paul; 216 & 218 Bates Ave, St. Paul, MN

## ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
856/0315A- B1 A1940812	Sealant	Heterogeneous	95%	Binder	<b>5% Chrysotile</b>
		Gray			
		Fibrous			
		Bound			
856/0315A- B2 Layer 1 A1940813	Mastic	Heterogeneous	2%	Cellulose	<b>None Detected</b>
		Black	3%	Fiberglass	
		Non-fibrous			
		Bound			
Layer 2 A1940813	Paper	Heterogeneous	100%	Cellulose	<b>None Detected</b>
		Brown			
		Fibrous			
		Bound			



---

**LEGEND:**    Non-Anth    = Non-Asbestiform Anthophyllite  
                 Non-Trem    = Non-Asbestiform Tremolite  
                 Calc Carb    = Calcium Carbonate

---

**METHOD:** EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

---

**LIMIT OF DETECTION:** <1% by visual estimation

---

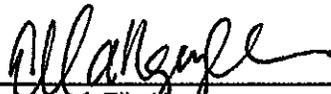
**REGULATORY LIMIT:** >1% by weight

---

Due to the limitations of the EPA 600 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.

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by CEI Labs, Inc. CEI Labs 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 may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

**ANALYST:**

  
Ella Nguyen

**APPROVED BY:**

  
Tianbao Bai, Ph.D., CIH  
Laboratory Director



