



## LIMITED PRE-RENOVATION ASBESTOS SURVEY REPORT

### 2222 Q Street Northwest

Washington, DC 20008

### Report Date

April 7, 2025

### Partner Project No.

25-482321.2

### Prepared for:

The UIP Companies, Inc.  
Washington, DC 20002



Building  
Science



Environmental  
Consulting



Construction &  
Development



Board of Zoning Adjustment  
District of Columbia  
CASE NO. 21453  
EXHIBIT NO. 24D  
Energy &  
Sustainability



April 7, 2025

Nick Calorio  
The UIP Companies, Inc.  
140 Q Street Northwest  
Washington, DC 20002

Subject: Limited Pre-Renovation Asbestos Survey Report  
2222 Q Street Northwest  
Washington, DC 20008  
Partner Project No. 25-482321.2

Dear Mr. Calorio:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the Limited Pre-Renovation Asbestos Survey Report of the abovementioned address (the "Subject Property"). Partner's survey included a site reconnaissance to locate, identify, assess, and quantify suspect asbestos containing materials (ACMs) and was performed in general conformance with AHERA and NESHAP standards as well as the scope and limitations as detailed in our fee proposal.

The purpose of this survey was to sample and determine the condition of accessible suspect ACMs in the building impacted by proposed renovation. Partner was not provided with specific renovation plans. This survey included a site reconnaissance, material sampling, and laboratory analysis. This assessment was performed utilizing methods and procedures consistent with good commercial or customary practices designed to conform to acceptable industry standards. The independent conclusions presented herein are based upon existing conditions and the information and data available to us during the course of this assignment.

We appreciate the opportunity to provide industrial hygiene services to The UIP Companies, Inc.. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (774)-375-3825.

Sincerely,

Partner Engineering and Science, Inc.

James Previte  
Relationship Manager

# EXECUTIVE SUMMARY

Partner presents our report for this Limited Pre-Renovation Asbestos Containing Material (ACM) Survey of 2222 Q Street Northwest in Washington, DC. The survey was performed for a real estate due diligence transaction in general conformance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation.

During this survey, 57 samples of suspect ACMs were collected for laboratory analysis. The building materials which were observed onsite yet are not considered to be suspect ACM by the Environmental Protection Agency (EPA); therefore, were not sampled included: glass, metal, or wood.

Based on the conditions set forth in this report, the following confirmed ACM and/or suspect ACM to be assumed ACM was identified:

| Identified ACMs                              |                          |                  |          |
|----------------------------------------------|--------------------------|------------------|----------|
| Description                                  | Locations                | Asbestos Content | Quantity |
| 8"x8" Dark Brown Floor Tile                  | Basement, destroyed room | 8% Chrysotile    | 60 SF    |
| Yellow flooring beneath 6"x6" Floor Sheeting | Unit 52- Kitchen         | 20% Chrysotile   | 20 SF    |

SF = Square Feet

Partner recommends these ACMs to be handled according to local, state and federal regulations. More specific recommendations for handling the identified ACMs are included in Section 3.2 of the main body of the report.

This was a non-destructive pre-renovation survey limited to 5 percent of units and common spaces. Suspect ACMs could be located in units not accessed or within areas not accessible during this assessment. A comprehensive ACM survey should be completed to verify the presence, location, and quantity of additional suspect ACMs, in accordance with U.S. EPA regulation 40 CFR Part 61, Subpart M (NESHAP), the Occupational Safety and Health Administration (OSHA) 29 CFR 1926.1101 (Asbestos in Construction Standard), and any state or local requirements prior to demolition.

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The following Appendices are attached at the end of this report.

## **Appendices**

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| <b>Appendix A:</b> | Table 2 – Analytical Results Table               |
| <b>Appendix B:</b> | Definitions                                      |
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| <b>Appendix F:</b> | Laboratory Analysis and Chain of Custody         |

# 1.0 INTRODUCTION

## 1.1 Subject Property Description

|                                             |                                                                 |
|---------------------------------------------|-----------------------------------------------------------------|
| <b><i>Address:</i></b>                      | 2222 Q St NW in Washington, DC. 20008                           |
| <b><i>Nature of Use:</i></b>                | Multi-Family Residential                                        |
| <b><i>Number of Buildings:</i></b>          | One                                                             |
| <b><i>Number of Floors:</i></b>             | Five                                                            |
| <b><i>Construction Date(s):</i></b>         | 1923                                                            |
| <b><i>Square Footage:</i></b>               | 6,634 SF                                                        |
| <b><i>Surveyed By / License Number:</i></b> | Joshua Hilton / License Number 24002563, expiration date: 11/25 |
| <b><i>Assessment Date / Time:</i></b>       | March 21, 2025 / 9:00 am                                        |

## 1.2 Purpose and Scope

The survey was performed at the Subject Property due to a proposed renovation of the interior and exterior of the structure. U.S. Environmental Protection Agency (EPA) regulation 40 CFR 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP), prohibits the release of asbestos fibers and other hazardous air pollutants to the atmosphere during renovation or demolition activities. Asbestos NESHAP requires the identification, classification, and quantification of potentially regulated asbestos-containing materials prior to planned disturbances.

The purpose of this survey was to investigate the condition of accessible suspect asbestos in the building impacted by proposed renovation plans. Partner was not provided with renovation plans. This survey was completed to follow a path of construction (renovation) and was not inclusive of all suspect asbestos-containing materials (ACMs) in the building. Asbestos may be present in materials not sampled outside of the path of construction, and additional sampling will be warranted in the event of future disturbance of suspect materials not identified within this report.

Additional services such as the interview of property management and maintenance personnel, tenants, review of prior reports, regulatory records, evaluation of compliance, risk assessment, and the development of abatement specifications are excluded from the scope of services, along with other activities not expressly identified herein. No destructive demolition, destructive testing, product research was performed in attempts to reveal material compositions.

## 2.0 METHODOLOGY

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Provided below is a summary of the methodologies used during the Limited Pre-Renovation Asbestos Survey performed at the Subject Property. The methodology is in general conformance with U.S. EPA Asbestos Hazard Emergency Response Act (AHERA), 40 CFR Part 763.

Partner performed a visual inspection of building materials to identify, classify and evaluate the condition of homogenous areas of suspect ACM. The exterior finish was brick and mortar. No access to the roof was provided. The roof was observed to consist of concrete. The interior finishes included drywall and plaster walls, ceramic tile and floor sheeting, concrete ceiling. A summary of the homogeneous areas identified during the survey and the condition of the asbestos-containing materials, if any, comprising these areas is provided in **Table 2** within **Appendix A**.

During this survey, 57 samples of suspect ACMs were collected for laboratory analysis. Sampled materials were analyzed using the Polarized Light Microscopy (PLM) method in accordance with the U.S. EPA Method 600/R-93/116 for Determination of Asbestos in Bulk Building Materials. The samples were analyzed by PLM at Eurofins Built Environment Testing East, LLC (Eurofins), which is accredited by the American Industrial Hygiene Association (AIHA) and the National Volunteer Laboratory Accreditation Program (NVLAP).

## 3.0 ANALYTICAL RESULTS / CONCLUSIONS AND RECOMMENDATIONS

**Table 1** lists the ACM identified by PLM analysis including the condition and quantity of each material. The analytical results for the suspect materials sampled are listed in **Table 2** in **Appendix A**. The laboratory results and chain of custody are included in **Appendix F**. ACM locations are depicted on the diagram included in **Appendix C**.

Documentation of the laboratory results should be retained as a reference for any future disturbance to the suspect ACMs identified within this report.

### 3.1 Analytical Results / Conclusions

Based on the conditions set forth in this report, the following ACMs were confirmed.

**Table 1**

| Identified ACMs                              |                          |                  |               |                                        |
|----------------------------------------------|--------------------------|------------------|---------------|----------------------------------------|
| Description                                  | Locations                | Asbestos Content | Quantity (SF) | Friability/ Condition/ NESHAP Category |
| 8"x8" Dark Brown Floor Tile                  | Basement, Destroyed Room | 8% Chrysotile    | 60 SF         | Non-Friable/ poor/ Category I          |
| Yellow flooring beneath 6"x6" Floor Sheeting | Unit 52- Kitchen         | 20% Chrysotile   | 20 SF         | Non-Friable/ Good/ Category I          |

SF = Square Feet

**NOTE:** At the time of this assessment Partner was granted limited access to the occupied building. Prior to renovation/demolition activities outside of this specific scope of work, additional supplemental testing should be performed. Materials not sampled must be considered as suspect ACM until sampling can be performed to determine the asbestos content.

### 3.2 Recommendations

Based on the observations onsite, the noted limitations and the analytical results, Partner has the following recommendations:

If any suspect ACM(s) not characterized in this report are encountered during renovation activities, work potentially disturbing the material(s) must stop. The uncharacterized suspect ACM must be assumed to be ACM and handled accordingly pending the completion of additional sampling and laboratory analysis.

Due to the limitations of this survey, once the areas have been vacated a thorough and destructive ACM survey should be completed to verify the presence, location, and quantity of additional suspect ACMs in

formerly inaccessible areas, in accordance with U.S. EPA regulation 40 CFR Part 61, Subpart M (NESHAP), OSHA 29 CFR 1926.1101 (Asbestos in Construction Standard), and any state or local requirements.

**Alternatives to removal:** The U.S. EPA recommends ACM be managed in-place whenever asbestos is identified in a building and will not be disturbed. Damaged friable and non-friable ACMs can be repaired, encapsulated, or enclosed according to federal, state, and local requirements. Intact ACMs in good condition, if the planned renovations are not imminent, can be managed with an Operations and Maintenance (O&M) Plan. Of note, an O&M Plan outlines protocols that have been established to mandate how ACMs are managed on an as needed basis and during routine maintenance activities. Routine maintenance activities include cleaning activities; protective or preventative measures to keep a building, its systems and its grounds in working order; periodic replacement of a limited number of component parts of a building feature or system that are subject to normal wear and tear; and replacement of a damaged or malfunctioning component part of a building feature or system. The U.S. EPA recommends “the least burdensome method with protects human health and the environment.”

Partner recommends ACM be removed from the facility according to local, state and federal regulations if it will be disturbed. This effort may include, but is not limited to:

- Regulator notification
- Specialized removal techniques to prevent worker, public and environmental exposures
- Specialized clean-up procedures
- Specialized waste storage and disposal

Actions taken in regard to the ACM should be in compliance with any applicable federal, state, and local regulations or codes applying to handling, disposal, and contracting. Presently, general renovation and disposal operations at both publicly and privately owned and operated facilities are regulated by the federal U.S. EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) Asbestos Standard (40 CFR 61, Subpart M). Private contractors who may be retained by a private building owner and the building owner itself, are under jurisdiction of the Occupational Safety and Health Administration (OSHA) asbestos regulations (29 CFR 1910.1001 and 29 CFR 1926.110 for the general and construction industries, respectively), which regulates workplace disturbance of building materials with any concentration of asbestiform components including those containing <1% asbestos as determined by a validated sampling and analytical method.

Trace asbestos (<1%) is regulated by OSHA for worker exposure and should be handled by asbestos-trained personnel using wet methods and appropriate Personal Protective Equipment (PPE). The work should be completed with prompt clean-up and disposal of waste in leak-tight containers, and the following is prohibited: use of high-speed abrasive disc saws without HEPA filtration, compressed air, or employee rotation as a means of reducing employee exposure to asbestos.

## 4.0 LIMITING CONDITIONS

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This work is not intended as a specification for asbestos abatement or to otherwise support bidding for or completion of maintenance, abatement, removal or replacement activities. Quantification of the exact quantities of materials is beyond the scope of this survey. Any quantities of ACM listed are estimates only and should be confirmed by the user.

Partner and its subcontractor, and their employees/representatives bear no responsibility for the actual condition of the structure or safety of this site pertaining to asbestos and/or asbestos contamination regardless of the actions taken by the survey team or the client.

The performance of this survey was limited by the following conditions:

- The roof was not sampled during this survey.
- Below-grade utility piping or foundation waterproofing were not sampled during this survey.
- Energized systems (charged electrical systems, hydraulic, and/or pneumatic pressure systems) or conveying systems (elevators, escalators, etc) were not sampled during this survey.
- Materials wherein the sampling process would negatively impact the appearance or operation of the subject property were not sampled unless expressly directed by the client.
- The survey was limited to areas which were considered readily accessible. No disassembly of equipment or accessing pipe chases, wall cavities, voids, or other inaccessible areas was performed.
- The sampling of architectural finishes has been limited where negative impacts to the appearance of such finishes would be likely to result, and no sampling of water-protective assemblies has been performed.
- Laboratory analysis was limited to evaluation of asbestos content by PLM, with a detection limit of 1%. Additional analysis, by point count or Transmission Electron Microscopy (TEM), may be required to meet state or local requirements.
- Additional ACM may be located within areas not accessed/safely accessible.

Partner survey was limited to the following areas during our Limited Pre-Renovation Survey:

- Basement
- Laundry Area
- Units 3, 34, 43, and 52

Partner assessed a specific SOW from proposal, the units observed did have not consistent building materials. Therefore, it is likely that additional suspect materials not identified within this report are present within units not assessed.

Sampling was performed utilizing methods and procedures consistent with good commercial or customary practices. The results of this sampling event cannot conclusively determine the absence of ACMs at the property per the local, state or federal sampling protocol(s); however, the results of the sampling performed at this property can be used to supplement a further survey of the property for regulatory compliance.

Any quantities of ACM listed are estimates only and should be confirmed by the Client. Partner subcontracted with Eurofins to perform the asbestos analysis. No warranties expressed or implied, are made by Partner or its subcontractor Eurofins or their employees as to the use of any information, apparatus, product or process disclosed in this report. Every reasonable effort has been made to assure correctness.

The services consist of professional opinions and recommendations made in accordance with generally accepted engineering principles/practices. These services were designed to provide an analytical tool to assist the client. Partner and its subcontractor Eurofins and their employees/representatives bear no responsibility for the actual condition of the structure or safety of this site pertaining to asbestos and/or asbestos contamination regardless of the actions taken by the survey team or the client.

## 5.0 SIGNATURES OF PROFESSIONALS

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Partner has performed an asbestos survey on the property at 2222 Q Street Northwest, Washington, DC in general conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

Prepared By:



Joshua Hilton  
Asbestos Inspector  
License/Certification Number: 240002563

Reviewed By:



Jordan Davis  
Reviewer



Brandon Winkler  
Project Manager