

Docket Item # 5  
BAR CASE # 2009-0109

BAR Meeting  
July 22, 2009

**ISSUE:** Demolition  
**APPLICANT:** William Cromley  
**LOCATION:** 224 North Fayette Street  
**ZONE:** CRMU/M Commercial

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**STAFF RECOMMENDATION:** Staff recommends denial of the application for a Permit to Demolish.

In the alternative, if the Board approves the Permit to Demolish, Staff recommends the following conditions:

1. That the applicant work with the Board, the community, and City Staff to develop a means to interpret and commemorate the history associated with the building, prior to the issuance of a Demolition Permit from the Office of Building and Fire Code Administration.
2. That the applicant submit to the Board an application for a Certificate of Appropriateness for review and approval, prior to issuance of a Demolition Permit from the Office of Building and Fire Code Administration.
3. That the applicant provide a written history of the American Legion Building, which at a minimum contains information of the date of construction, any major alterations, information about persons or events associated with its uses since construction, general architectural characteristics, and its association with similar types of resources. The history should be prepared by an historian meeting the Secretary of the Interior's qualifications and approved by Historic Preservation Section Planning Staff.
4. That, prior to the issuance of the Demolition Permit from the Office of Building and Fire Code Administration, the applicant provide archival quality photographic documentation to HABS/HAER Standards (Historic American Building Survey and Historic American Engineering Record), consisting of large scale 4" x 5" negative black and white record photographs.
5. That, prior to the issuance of the Demolition Permit from the Office of Building and Fire Code Administration, the applicant provide to the City measured drawings of the

building to HABS/HAER Standards (Historic American Building Survey and Historic American Engineering Record). The drawings should include a floor plan and elevations at a minimum scale of  $\frac{1}{4}'' = 1'$ . Drawings may be in AutoCad, pencil or ink on vellum or mylar on sheets with maximum dimensions of 30" x 42".

6. That, prior to the issuance of the Demolition Permit from the Office of Building and Fire Code Administration, two sets of the photographs together with one set of negatives and the measured drawings and written history shall be completed, approved by Staff, and deposited at the Alexandria Black History Museum and the Special Collections of the Barrett Library.

7. To insure that archaeological resources are not disturbed by the demolition process, the applicant shall obtain a Scope of Work from Alexandria Archaeology and hire an archaeological firm to provide monitoring for the demolition of the structure. No ground disturbance shall result on the entire property as a result of the demolition (i.e., the foundation and/or wall footings, steps, walls, basement, buried utility lines, etc. may not be removed; ground surfaces may not be rutted or cut into by heavy equipment).

8. To insure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for this investigation. Archaeological monitoring shall be required during demolition. The Documentary Study and Archaeological Evaluation shall be completed prior to submittal of the site plan for preliminary review. If significant resources are discovered, the consultant shall complete a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

9. The statements in archaeology conditions below shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements:

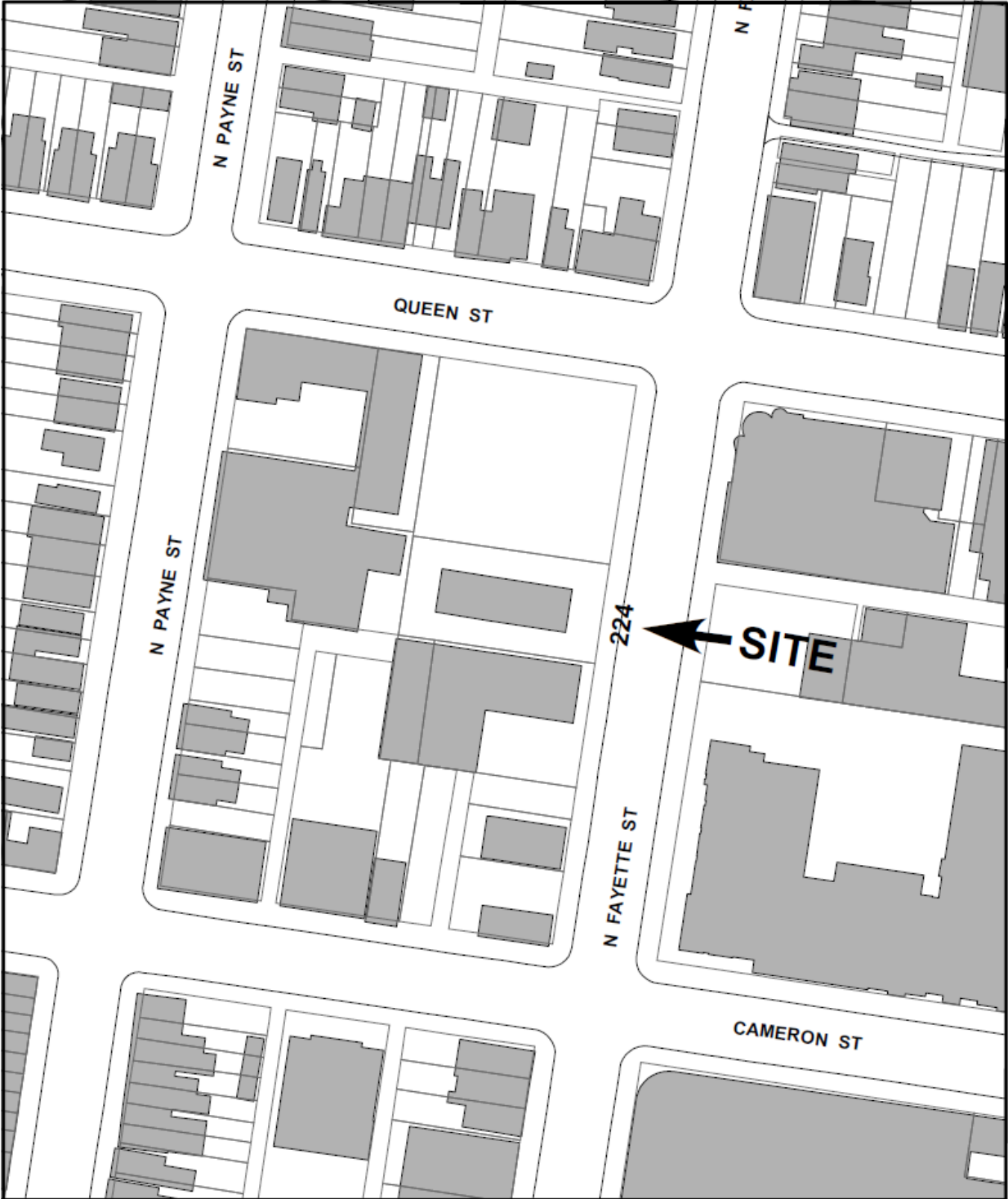
- a. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to preserve and/or recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.
- b. The applicant/developer shall call Alexandria Archaeology immediately (703-838-4399) if any buried structural remains (wall foundations, wells, privies, cisterns, etc.) or concentrations of artifacts are discovered during development. Work must cease in the area of the discovery until a City archaeologist comes to the site and records the finds.

- c. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

10 .The applicant shall hire a professional consultant to work with staff and the landscape designers to incorporate and interpret elements of the historical character and archaeological findings into the design of the open space and to prepare interpretive signs, which shall be erected as part of the development project. The site plan shall indicate themes and locations of interpretive elements. Prior to release of the final site plan, the consultant shall provide text and graphics for the signage subject to approval by the Office of Historic Alexandria/Alexandria Archaeology and the Directors of P&Z and RP&CA.

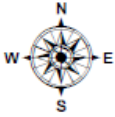
**\*\*EXPIRATION OF APPROVALS NOTE:** In accordance with Sections 10-106(B) and 10-206(B) of the Zoning Ordinance, any official Board of Architectural Review approval will expire 12 months from the date of issuance if the work is not commenced and diligently and substantially pursued by the end of that 12-month period.

**\*\*BUILDING PERMIT NOTE:** Most projects approved by the Board of Architectural Review require the issuance of one or more construction permits by Building and Fire Code Administration (including signs). The applicant is responsible for obtaining all necessary construction permits after receiving Board of Architectural Review approval. Contact Code Administration, Room 4200, City Hall, 703-838-4360 for further information.



**BAR CASE #2009-0109**

**7/22/2009**



**Note:** This docket item requires a roll call vote for approval.

**I. ISSUE:**

The applicant is requesting approval of a Permit to Demolish/Encapsulate in order to completely demolish the existing building at 224 North Fayette Street, known as the American Legion Building, adjacent to Hunter/Miller Park.

The building located at 224 North Fayette Street is a simple, one-story, rectangular, gable-fronted, freestanding frame dwelling constructed in 1944. The building has original asbestos shingle siding, asphalt shingle roof, two exposed brick chimneys on the south elevation, and twelve-over-twelve, double-hung wood windows. While very minimal in detailing, the building does have exposed rafter ends and gabled stick style hoods over the centered front, side, and rear entrances, characteristic of mail-order buildings from 1910-1940. While the building has deteriorated due to a lack of proper maintenance, the original character defining features are still evident and have been retained.

The applicant states the building is past its useful life and has been effectively been demolished by neglect by a lack of care and maintenance on the part of past owners. In the submitted narrative, the applicant states that the roof, windows, and exterior asbestos siding cannot be retained due to deterioration.

At this time, the applicant has not filed a Certificate of Appropriateness for new construction or submitted a formal Concept Plan for review by the Board. The applicant states that his intention is to redevelop the property with a structure that fits the uses of the CRMU/M Zone, using green building technologies and meets the goals of the Braddock Road Metro Small Area Plan.

**II. HISTORY:**

The structure was originally built in 1944 to house a nursery school operated by the City school system. Later, in 1950, the building was leased and then sold to the American Legion Post, named for William Thomas, the first African-American soldier from Alexandria to be killed in action during World War I. The American Legion itself was chartered in 1931. During the segregation era, it served as the only American Legion outpost in Alexandria open to African-Americans. The American Legion sponsored such activities as Boys State, youth programs, sports teams and participated in parades.

As noted, while the building has been poorly maintained, the simple vernacular building remains virtually unaltered from the time of construction. The building has been determined to be a contributing building to the proposed Uptown/Parker-Gray National Register Historic District. The District itself has been listed in the Virginia Landmarks Register by the Virginia Board of Historic Resources as of June 2008. The area of significance that Parker-Gray meets in terms of criteria for listing on the state and federal registers include the categories of architecture, ethnic heritage: African-American, and social history.

The American Legion building contributes to the District's significance because of its age—65 year old, its intact architectural integrity, and its association as an African-American institution within the neighborhood.

The applicant purchased the property in February of 2009. After meeting with P & Z Staff and exploring options for rehabilitation, including possibly a new addition, the applicant determined that it was not feasible to rehabilitate the building. In March, the applicant offered to donate the building to the City, and to have it moved to the adjacent Hunter/Miller Park, the City, however, declined the offer. In April, the applicant reapproached P & Z with a proposal to demolish the building and then construct a new building. In May, the applicant filed an application for a Permit to Demolish to be heard by the Board at the June 24 hearing. Following discussions with the department, in which Staff voiced strong concerns regarding the appropriateness of a total demolition, the applicant agreed to take this item for discussion to the Board prior to moving forward with a formally docketed hearing. That discussion took place at the June meeting.

### **III. ANALYSIS:**

In considering a Permit to Demolish/Capsulate, the Board must consider the following criteria set forth in the Zoning Ordinance, §10-205(B):

- (1) Is the building or structure of such architectural or historical interest that its removal would be to the detriment of the public interest?
- (2) Is the building or structure of such interest that it could be made into an historic shrine?
- (3) Is the building or structure of such old and unusual or uncommon design, texture, and material that it could not be reproduced or be reproduced only with great difficulty?
- (4) Would retention of the building or structure help preserve and protect an historic place or area of historic interest in the city?
- (5) Would retention of the building or structure promote the general welfare by maintaining and increasing real estate values, generating business, creating new positions, attracting tourists, students, writers, historians, artists, and artisans, attracting new residents, encouraging study and interest in American history, stimulating interest and study in architecture and design, educating citizens in American culture and heritage and making the city a more attractive and desirable place to live?
- (6) Would retention of the building or structure help maintain the scale and character of the neighborhood?

The American Legion Building meets Criteria (1), (4), (5), and (6). Staff finds that the building is of such historical interest due to its association with African-American social and cultural history that its removal would be a detriment to the public interest (Criteria 1). In addition, Staff finds that the retention of the building would help preserve and protect an historic place or area of history in the city, once again due to its association with African-American social and cultural history (Criteria 4). Furthermore, Staff finds the retention of the building would promote the general welfare by attracting tourists, students, writers, historians, artists, and artisans, and encouraging study and interests in American history—particularly African-American history—while educating citizens in American culture and making the city a more attractive and desirable place to live (Criteria 5). Lastly, Staff finds that retention of the building would indeed help maintain the scale and character of the neighborhood (Criteria 6).

Staff believes the existing building retains its historic integrity as it relates to its original design and form, details, location, setting and association. The applicant has not demonstrated that the

building is so structurally deteriorated that it merits demolition. While the applicant provide a narrative letter from a structural engineer, the report contained no photographs illustrating the concerns and observations of the engineer, which would be expected as part of a complete and thorough historic structures report. The Design Guidelines state: "In some instances, the Boards may require a structural analysis of the building by a licensed professional engineer in order to make an informed decision regarding the structural integrity of a building before making a decision on the application for a Permit to Demolish." Staff finds the current letter lacking in detail and relates to cosmetic issues and not structural issues. Most of the items outlined in the letter are common occurrences in buildings that are preserved and rehabbed in both the City's historic districts.

Staff notes that the Parker-Gray district is largely comprised of residential buildings. Its small number of civic and institutional buildings has even greater importance than might be true elsewhere. Buildings such as the American Legion that are directly connected to the social and cultural history of the neighborhood, namely its African-American history and the era of segregation, are important to be retained and preserved. As the neighborhood has undergone changes and transitions, Staff is concerned that its history and the building stock associated with that history will be lost. While the history associated with the building is perhaps the strongest case for its retention, the integrity of the building's style and form also supports its retention. It has only been very slightly altered since its construction over 65 years ago. In respect to context, the American Legion Building is very similar to other buildings built during the 1930s and 1940s, specifically for use by the African-American community throughout the nation, namely Rosenwald Schools and emergency nursery schools. While some Rosenwald Schools were constructed of brick, many surviving examples were constructed as framed structures with wood siding and with forms, size, and floor plans comparable to the one-story American Legion Building. It is important that the building be studied and compared to this context of resources.

The Design Guidelines state "Generally speaking, there must be a compelling reason for the demolition, either in whole or in part, of a significant structure in the historic districts." The American Legion building is a significant structure in that it is now listed on the Virginia Landmarks Register as a contributing building to the Uptown/Parker-Gray Historic District, and thus, is also a contributing structure to the proposed National Register District. The building meets 4 of the 6 criteria set forth in the Ordinance for reviewing proposed demolition for its intact architecture (Criteria 1 and 6), and for its historical associations (Criteria 4 and 5).

At this time, Staff does not believe that a compelling argument has been made by the applicant to warrant demolition. Therefore, Staff recommends that the Permit to Demolish be denied. In the event the building does receive approval for demolition, there must be some form of commemoration of the building and its history incorporated into any new development. At this time, we have not received a concept plan for what would be constructed at this location, and how the Legion building's history would be incorporated or memorialized (plaques, photographs, etc.) How this commemoration occurs needs to be discussed and determined prior to any issuance of a demolition permit.

**IV. STAFF RECOMMENDATION:** Staff recommends denial of the application for a Permit to Demolish.

In the alternative, if the Board approves of the Permit to Demolish, Staff recommends the following conditions:

1. That the applicant work with the Board, the community, and City Staff to develop a means to interpret and commemorate the history associated with the building, prior to the issuance of a Demolition Permit from the Office of Building and Fire Code Administration.
2. That the applicant submit to the Board an application for a Certificate of Appropriateness for review and approval, prior to a issuance of a Demolition Permit from the Office of Building and Fire Code Administration.
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7. To insure that archaeological resources are not disturbed by the demolition process, the applicant shall obtain a Scope of Work from Alexandria Archaeology and hire an archaeological firm to provide monitoring for the demolition of the structure. No ground disturbance shall result on the entire property as a result of the demolition (i.e., the foundation and/or wall footings, steps, walls, basement, buried utility lines, etc. may not



be removed; ground surfaces may not be rutted or cut into by heavy equipment).

8. To insure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for this investigation. Archaeological monitoring shall be required during demolition. The Documentary Study and Archaeological Evaluation shall be completed prior to submittal of the site plan for preliminary review. If significant resources are discovered, the consultant shall complete a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

9. The statements in archaeology conditions below shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements:

- a. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to preserve and/or recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.
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- c. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

10. The applicant shall hire a professional consultant to work with staff and the landscape designers to incorporate and interpret elements of the historical character and archaeological findings into the design of the open space and to prepare interpretive signs, which shall be erected as part of the development project. The site plan shall indicate themes and locations of interpretive elements. Prior to release of the final site plan, the consultant shall provide text and graphics for the signage subject to approval by the Office of Historic Alexandria/Alexandria Archaeology and the Directors of P&Z and RP&CA.

## **V. CITY DEPARTMENT COMMENTS**

Legend: C - code requirement R - recommendation S - suggestion F- finding

### **Code Enforcement:**

- C-1 Prior to the issuance of a demolition permit or land disturbance permit, a rodent abatement plan shall be submitted to Code Enforcement that will outline the steps that will taken to prevent the spread of rodents from the construction site to the surrounding community and sewers.
- C-2 Where a structure has been demolished or removed, the vacant lot shall be filled and maintained to the existing grade (USBC 3303.4).
- C-3 Service utility connections shall be discontinued and capped approved rules and (USBC 3303.6).
- C-4 Provisions shall be made to prevent the accumulation of water or damage to any foundation on the premises or adjoining property (USBC 3303.5).
- C-5 Where a building is being demolished and a standpipe exists within a building, such standpipe shall be maintained in an operable condition so as to be available for use by the fire department. Such standpipe shall be demolished with the building but shall not be demolished more than one floor below the floor being demolished.

### **Historic Alexandria:**

R- Deny demolition.

### **Alexandria Archaeology:**

#### **Findings:**

F-1 In *Historic Alexandria, Virginia, Street by Street, A Survey of Existing Early Buildings*, Ethelyn Cox indicates that an early powder house was present at the southwest corner of Queen and Fayette Streets in the 18<sup>th</sup> century. The Hopkins Insurance Map shows that structures were present on this property in 1877, and in the early 1940's the City built a nursery school on the lot. Later, this structure was leased and then sold to the American Legion Post, named for William Thomas, the first African American soldier from Alexandria to be killed in action during World War I. Given the lack of intensive development on this property, it is possible some evidence of the powder house (if it extended onto the lot) could remain despite the 19<sup>th</sup> and 20<sup>th</sup>-century construction. The lot therefore has the potential to yield archaeological resources which could provide evidence of residential and other activities in the 19<sup>th</sup> and early 20<sup>th</sup> centuries and of the highly significant earlier powder house.

F-2 This project will require a site plan and will need to comply with provisions of the Archaeological Protection Code.

### **Recommendations:**

**For Demolition of the Existing Building:**

1. To insure that archaeological resources are not disturbed by the demolition process, the applicant shall obtain a Scope of Work from Alexandria Archaeology and hire an archaeological firm to provide monitoring for the demolition of the structure. No ground disturbance shall result on the entire property as a result of the demolition (i.e., the foundation and/or wall footings, steps, walls, basement, buried utility lines, etc. may not be removed; ground surfaces may not be rutted or cut into by heavy equipment).

**For Development of the Property:**

1. To insure that significant information is not lost as a result of the current development project, the applicant shall hire an archaeological consultant to complete a Documentary Study and an Archaeological Evaluation. The applicant shall contact Alexandria Archaeology to obtain a scope of work for this investigation. Archaeological monitoring shall be required during demolition. The Documentary Study and Archaeological Evaluation shall be completed prior to submittal of the site plan for preliminary review. If significant resources are discovered, the consultant shall complete a Resource Management Plan, as outlined in the *City of Alexandria Archaeological Standards*. Preservation measures presented in the Resource Management Plan, as approved by the City Archaeologist, will be implemented.

2. The statements in archaeology conditions below shall appear in the General Notes of all site plans and on all site plan sheets that involve demolition or ground disturbance (including Demolition, Foundation/Basement Plans, Erosion and Sediment Control, Grading, Landscaping, Utilities, and Sheeting and Shoring) so that on-site contractors are aware of the requirements:

a. All required archaeological preservation measures shall be completed prior to ground-disturbing activities (such as coring, grading, filling, vegetation removal, undergrounding utilities, pile driving, landscaping and other excavations as defined in Section 2-151 of the Zoning Ordinance) or a Resource Management Plan must be in place to preserve and/or recover significant resources in concert with construction activities. To confirm, call Alexandria Archaeology at (703) 838-4399.

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c. The applicant/developer shall not allow any metal detection to be conducted on the property, unless authorized by Alexandria Archaeology.

3. The applicant shall hire a professional consultant to work with staff and the landscape designers to incorporate and interpret elements of the historical character and archaeological findings into the design of the open space and to prepare interpretive signs, which shall be erected as part of the development project. The site plan shall indicate themes and locations of interpretive elements. Prior to release of the final site plan, the consultant shall provide text and graphics for the signage subject to approval by the Office of Historic Alexandria/Alexandria Archaeology and the Directors of P&Z and RP&CA.

Transportation & Environmental Services

**RECOMMENDATIONS**

- R1. A copy of an approved Grading Plan must be attached to the demolition permit application. The Grading Plan is required because land disturbance associated with the demolition activities exceeds 2,500 square feet in area.

In summary, City Code Section 8-1-22(d) requires that a grading plan be submitted to and approved by T&ES prior to the issuance of building permits for improvements involving:

- the construction of a new home;
- construction of an addition to an existing home where either
  - the addition exceeds the area of the existing building footprint by 100% or more;
  - or, the construction of the addition results in less than 50% of the existing first floor exterior walls, in their entirety, remaining;
- changes to existing grade elevation of 1-foot or greater;
- changes to existing drainage patterns;
- land disturbance of 2,500 square feet or greater.

Questions regarding the processing of grading plans should be directed to the T&ES Site Plan Coordinator at (703) 838-4318. Memorandum to Industry No. 02-08 was issued on April 28, 2008 and can be viewed online via the following link.

**<http://alexandriava.gov/uploadedFiles/tes/info/gradingPlanRequirements.pdf>**

- R2. Applicant shall be responsible for repairs to the adjacent city right-of-way if damaged during construction activity. (T&ES)
- R5. An erosion and sediment control plan must be approved by T&ES prior to any land disturbing activity greater than 2,500 square feet. (T&ES)
- R6. Compliance with the provisions of Article XIII of the City's zoning ordinance for stormwater quality control is required for any land disturbing activity greater than 2,500 square feet. (T&ES)



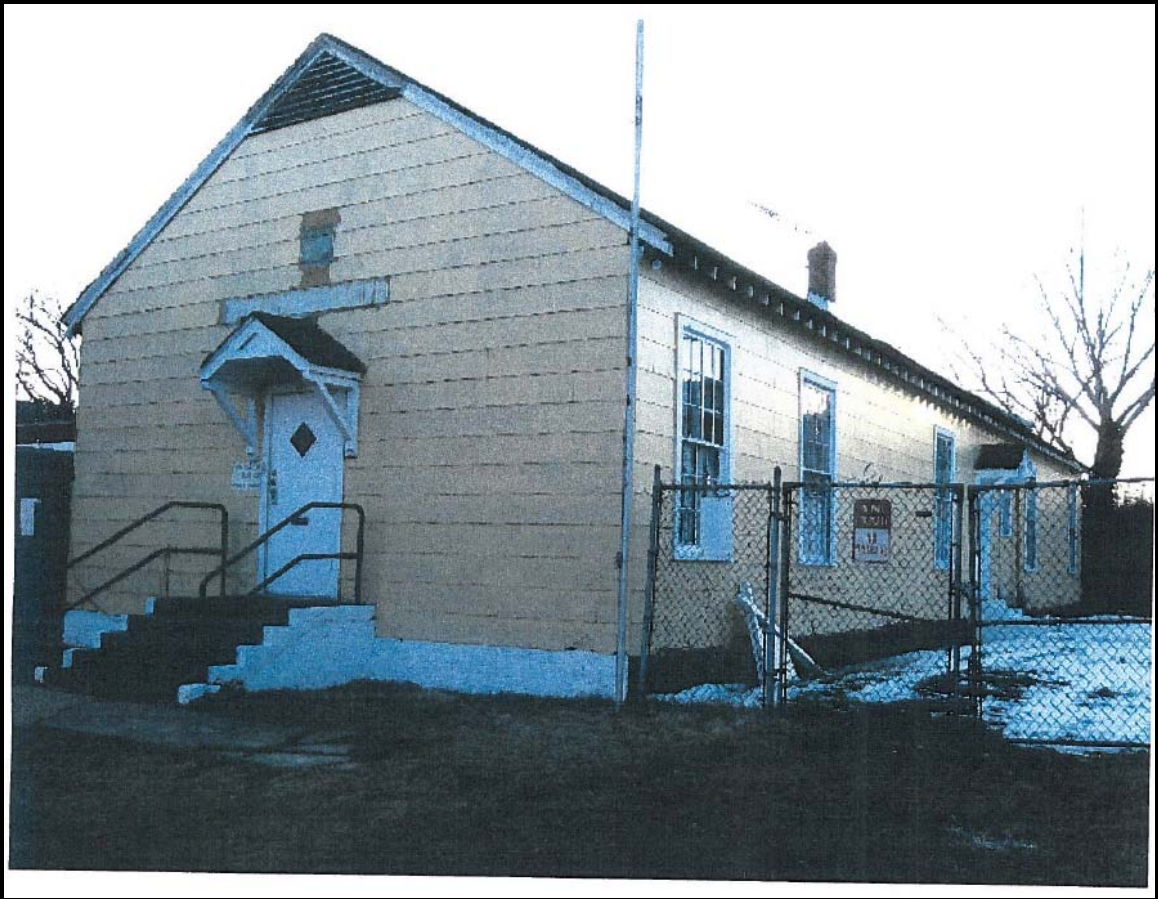


Figure 2. Existing exterior condition photograph from N. Fayette Street.





East (Front) Elevation,2009/05/14 08:35:02



North (Park) Elevation,2009/05/14 08:36:21



South Elevation,2009/05/14 08:37:00



West (Rear) Elevation,2009/05/14 08:38:33

Figure 3. Existing exterior condition photographs of building.

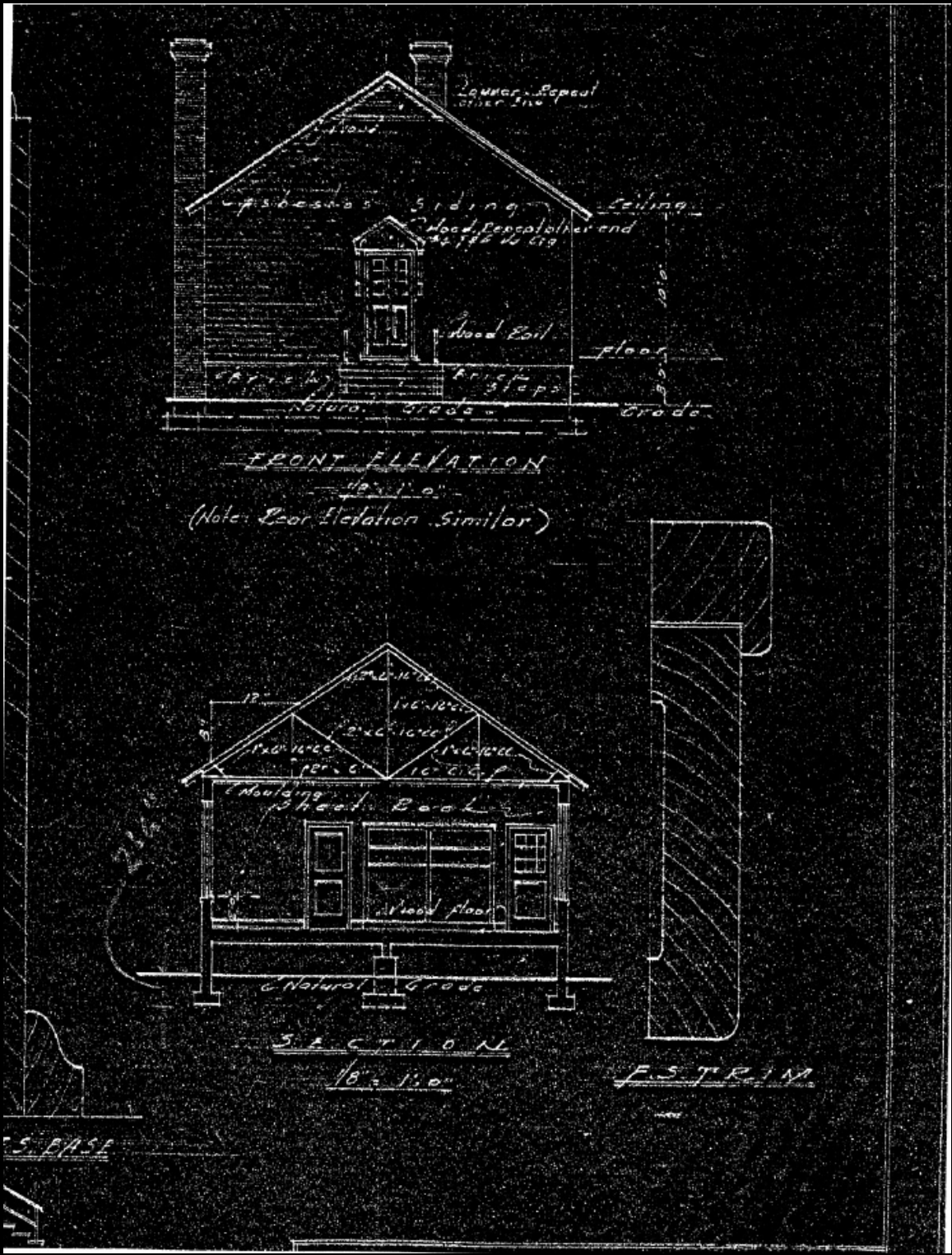


Figure 4. Original Construction Drawing.



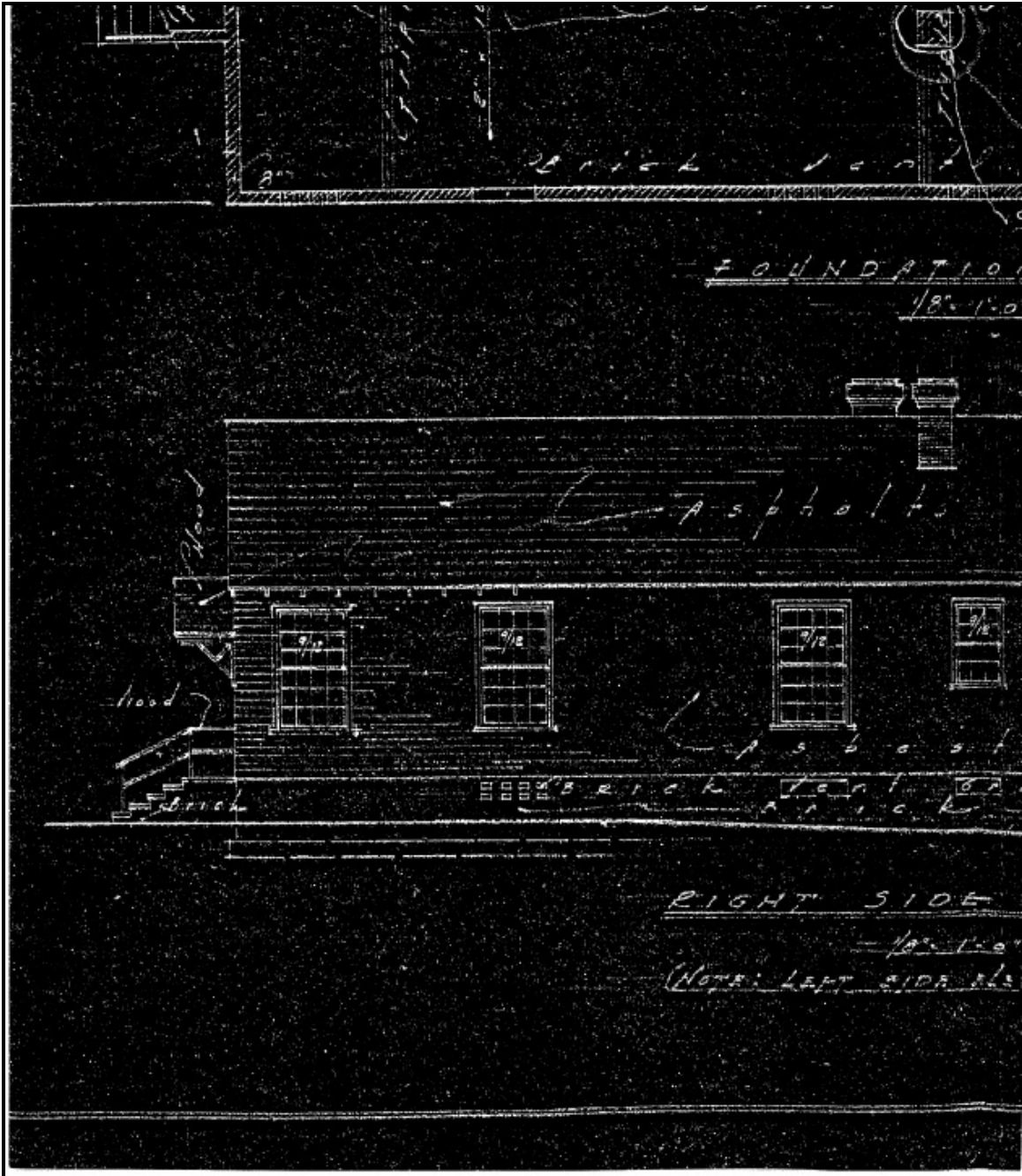


Figure 5. Original Construction Drawing.

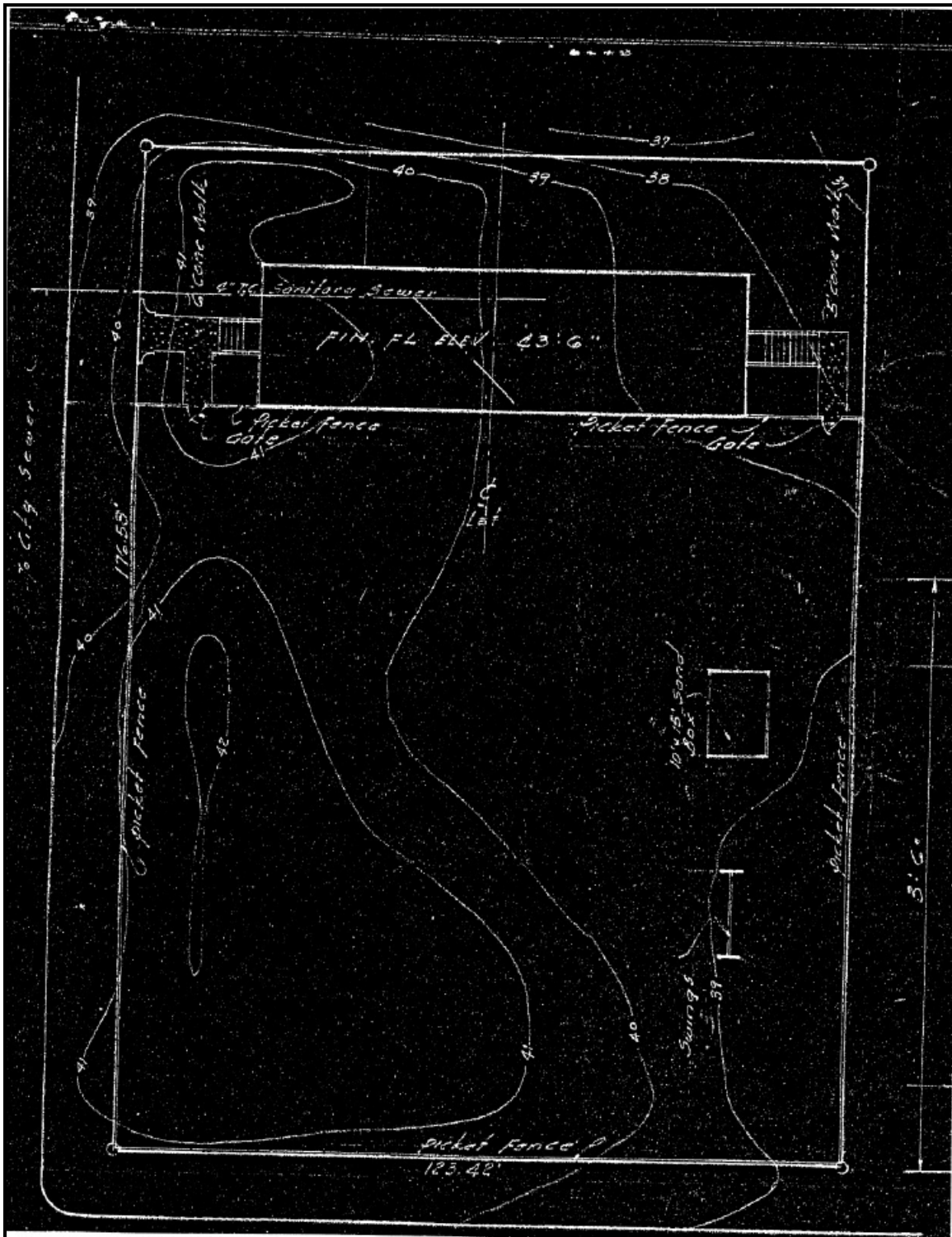


Figure 6. Original Site Plan.

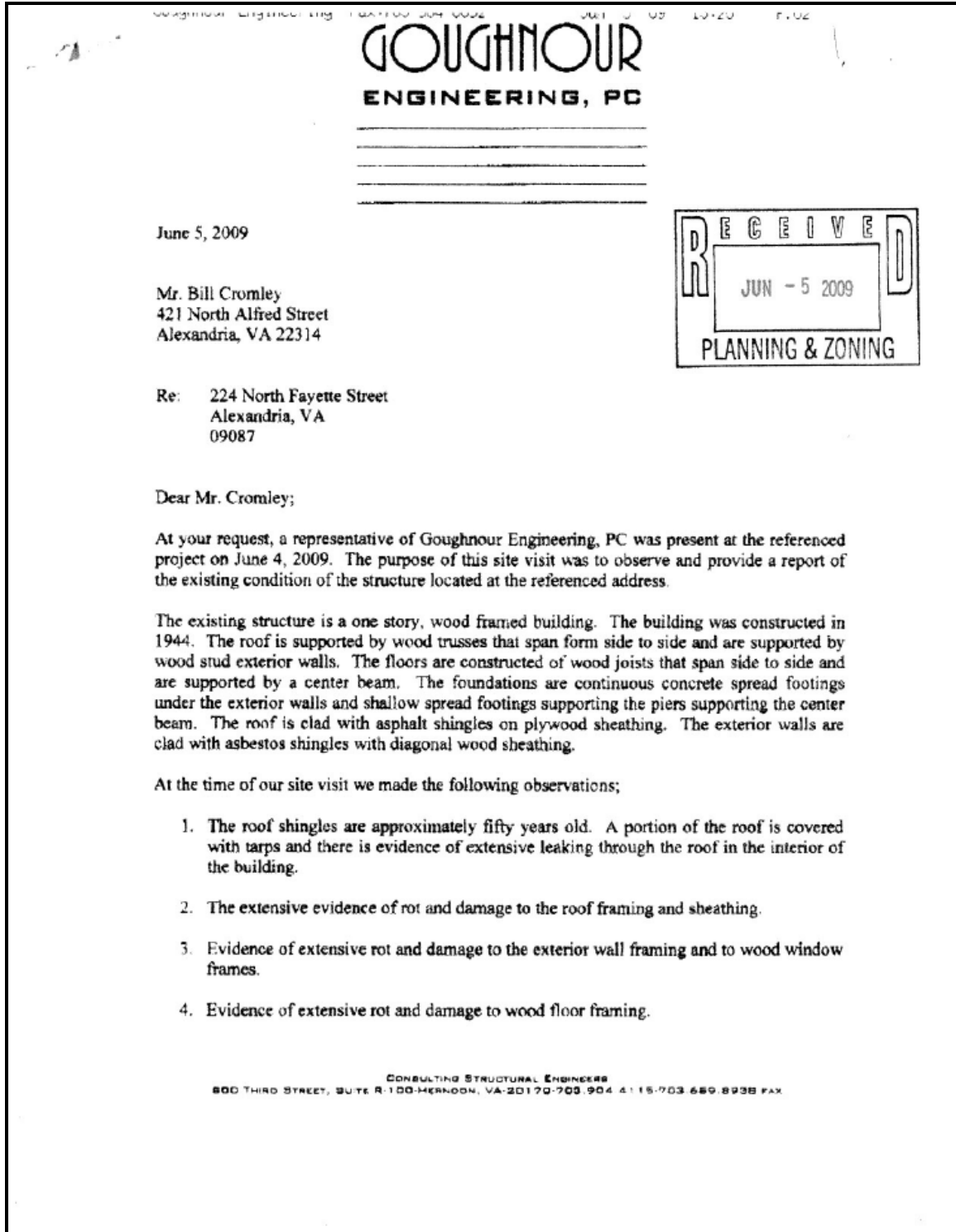


Figure 7. Letter from Engineer.

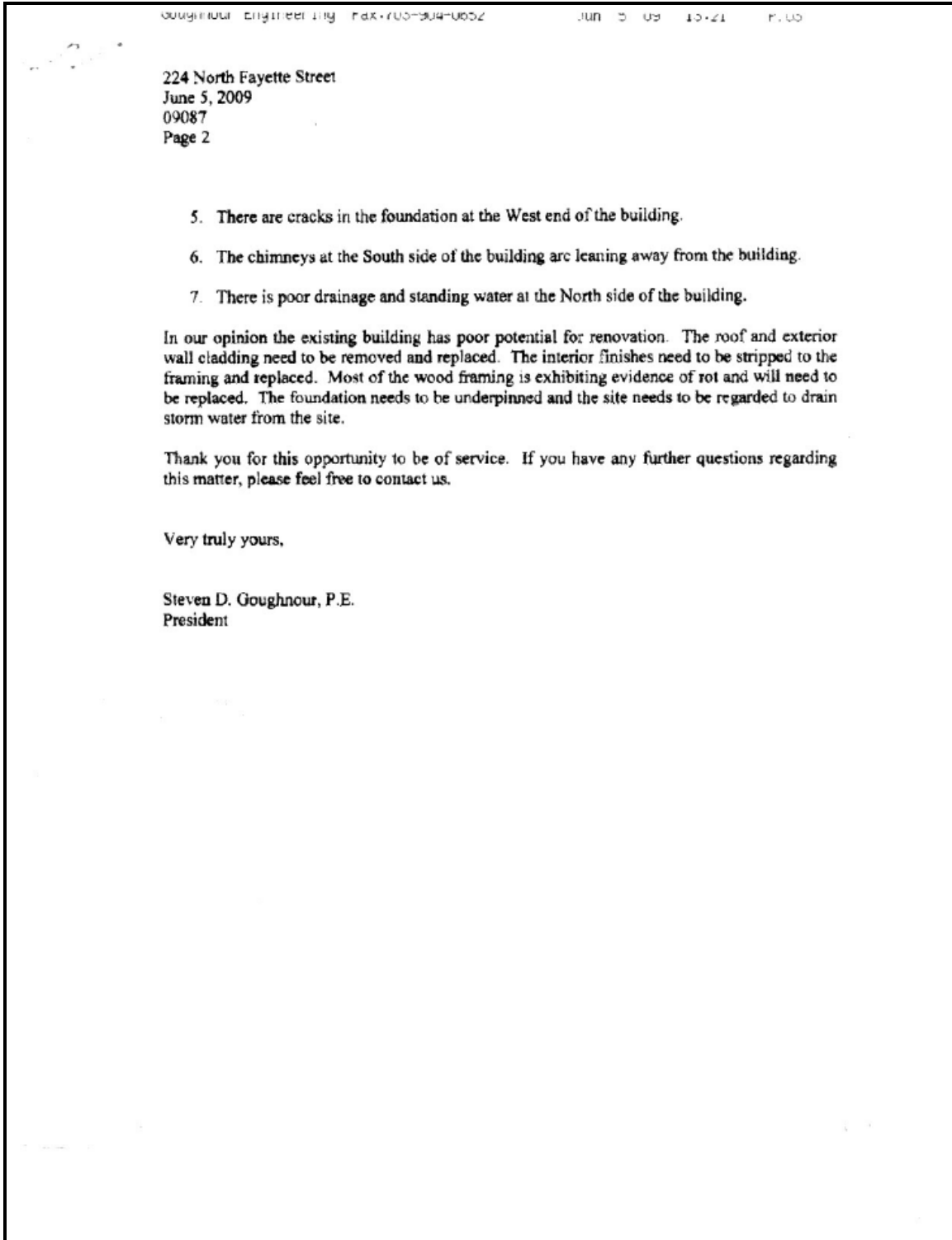



Figure 8. Original Site Plan.

page 1 of 2



**RECEIVED**  
 JUN - 8 2009  
 PLANNING & ZONING

**Chain of Custody**  
**Asbestos Lab Services**

190905212  
 EMSL Analytical, Inc.  
 10768 Baltimore Avenue  
 Beltsville, MD 20705  
 Phone: (301) 937-5700  
 Fax: (301) 937-5701  
<http://www.emsl.com>

Please print all information legibly.

<b>Company:</b>	Gormley Environmental Corp.	<b>Bill To:</b>	Gormley Environmental Corp.
<b>Address1:</b>	P.O. Box 28	<b>Address1:</b>	P.O. Box 28
<b>Address2:</b>		<b>Address2:</b>	
<b>City, State:</b>	Bryans Road, MD	<b>City, State:</b>	Bryans Road, MD
<b>Zip/Post Code:</b>	20616	<b>Zip/Post Code:</b>	20616
<b>Country:</b>	US	<b>Country:</b>	US
<b>Contact Name:</b>	Larry Gormley	<b>Attn:</b>	Larry Gormley
<b>Phone:</b>	301-753-5659	<b>Phone:</b>	301-753-5659
<b>Fax:</b>	301-753-6476	<b>Fax:</b>	301-753-6476
<b>Email:</b>	lgormley@gormleyenvironmental.com	<b>Email:</b>	lgormley@gormleyenvironmental.com
<b>EMSL Rep:</b>		<b>P.O. Number:</b>	
<b>Project Name/Number:</b> 224 N. Fayette Street			

MATRIX			TURNAROUND			
<input type="checkbox"/> Air	<input type="checkbox"/> Soil	<input type="checkbox"/> Micro-Vac	<input checked="" type="checkbox"/> 3 Hours	<input type="checkbox"/> 6 Hours		<input type="checkbox"/> 24 Hours (1 day)
<input checked="" type="checkbox"/> Bulk	<input type="checkbox"/> Drinking Water		<input type="checkbox"/> 48 Hours (2 days)	<input type="checkbox"/> 72 Hours (3 days)	<input type="checkbox"/> 96 Hours (4 days)	<input type="checkbox"/> 120 Hours (5 days)
<input type="checkbox"/> Wipe	<input type="checkbox"/> Wastewater		<input type="checkbox"/> 144+ hours (6-10 days)			

TEM AIR, 3 hours, 6 hours, Please call ahead to schedule. There is a premium charge for 3-hour tat, please call 1-800-220-3675 for price prior to sending samples. You will be asked to sign an authorization form for this service.

<b>PCM - Air</b> <input type="checkbox"/> NIOSH 7400(A) Issue 2, August 1994 <input type="checkbox"/> OSHA w/TWA <input type="checkbox"/> Other:	<b>TEM Air</b> <input type="checkbox"/> AHERA 40 CFR, Part 763 Subpart E <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II	<b>TEM WATER</b> <input type="checkbox"/> EPA 100.1 <input type="checkbox"/> EPA 100.2 <input type="checkbox"/> NYS 198.2
<b>PLM - Bulk</b> <input checked="" type="checkbox"/> EPA 600/R-93/116 <input type="checkbox"/> EPA Point Count <input type="checkbox"/> NY Stratified Point Count <input type="checkbox"/> PLM NOB (Gravimetric) NYS 198.1 <input type="checkbox"/> NIOSH 9002: <input type="checkbox"/> EMSL Standard Addition:	<b>TEM BULK</b> <input type="checkbox"/> Drop Mount (Qualitative) <input type="checkbox"/> Chatfield SOP - 1988-02 <input type="checkbox"/> TEM NOB (Gravimetric) NYS 198.4 <input type="checkbox"/> EMSL Standard Addition:	<b>TEM Microvac/Wipe</b> <input type="checkbox"/> ASTM D 5755-95 (quantitative method) <input type="checkbox"/> Wipe Qualitative
<b>SEM Air or Bulk</b> <input type="checkbox"/> Qualitative <input type="checkbox"/> Quantitative	<b>PLM Soil</b> <input type="checkbox"/> EPA Protocol Qualitative <input type="checkbox"/> EPA Protocol Quantitative <input type="checkbox"/> EMSL MSD 9000 Method fibers/gram	<b>XRD</b> <input type="checkbox"/> Asbestos <input type="checkbox"/> Silica NIOSH 7500  <b>OTHER</b> <input type="checkbox"/>

[http://www.emsl.com/COC\\_Print.cfm?action=print&ServiceCatSelect=3&LabsSelect=Belts...](http://www.emsl.com/COC_Print.cfm?action=print&ServiceCatSelect=3&LabsSelect=Belts...) 6/5/2009

Figure 9. Asbestos Removal Form.



**EMSL Analytical, Inc.**  
 10768 Baltimore Avenue, Beltsville, MD 20705  
 Phone: (301) 937-5700 Fax: (301) 937-5701 Email: beltsvillelab@emsl.com

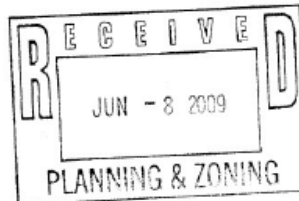
Attn: **Larry Gormley**  
**Gormley Environmental**  
**P.O. Box 28**  
**Bryans Road, MD 20616**

Fax: (301) 753-6476 Phone: (301) 753-9358  
 Project: **224 N. FAYETTE STREET**

Customer ID: GORM50  
 Customer PO:  
 Received: 06/05/09 12:50 PM  
 EMSL Order: 190905212  
 EMSL Proj:  
 Analysis Date: 6/5/2009

**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
F 1 190905212-0001	FLOOR TILE	Black Non-Fibrous Heterogeneous		90% Non-fibrous (other)	10% Chrysotile
F 2 190905212-0002	EXTERIOR SIDING	Beige Non-Fibrous Heterogeneous		70% Non-fibrous (other)	30% Chrysotile



Analyst(s)

Alexis Turner (2)

Joe Centifoni, Laboratory Manager  
 or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. The limit of detection, as stated in the method is 1%. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of EMSL Analytical, Inc. EMSL's liability is limited to the cost of analysis. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. Samples received in good condition unless otherwise noted. This report must not be used to claim product endorsement by NVLAP or any agency of the U.S. Government.  
 NVLAP Lab Code 20029340

Test Report PLM-7.12.0 Printed: 6/5/2009 1:18:43 PM

**THIS IS THE LAST PAGE OF THE REPORT.**

Figure 10. Asbestos Removal Form.



### Chain of Custody Asbestos Lab Services

EMSL Analytical, Inc.  
 10768 Baltimore  
 Avenue  
 Beltsville, MD 20705

Phone: (301) 937-5700  
 Fax: (301) 937-5701  
<http://www.emsl.com>

Please print all information legibly.

Client Sample # (s) F1 F2  
 Relinquished: [Signature] Date: 6/5/09  
 Received: [Signature] Date: 6/5/09  
 Relinquished: \_\_\_\_\_ Date: \_\_\_\_\_  
 Received: \_\_\_\_\_ Date: \_\_\_\_\_

Total Samples #: 2  
 Time: \_\_\_\_\_  
 Time: 1250pm W/W  
 Time: \_\_\_\_\_  
 Time: \_\_\_\_\_

SAMPLE NUMBER	SAMPLE DESCRIPTION/LOCATION	VOLUME (if applicable)
F1	FLOOR TILE	BULK
F2	EXTERIOR SIDING	BULK

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Figure 11. Asbestos Form.



Figure 12. Example of historic Rosenwald school.



Figure 13. Example of historic Rosenwald school.



Figure 14. Example of historic Rosenwald school.