Analysis of Brownfield Cleanup Alternatives
Former First National Bank
3 North Poplar Street
Marianna, Arkansas 72360

April 8, 2025

PRESENTED TO

Arkansas Department of Energy and Environment, Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118
(501) 682 0771

Allie Cook
Project Manager/Environmental Scientist

PRESENTED BY

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1.0 INTRODUCTION

The Arkansas Department of Energy and Environment, Division of Environmental Quality (ADEE-DEQ) tasked Tetra Tech, Inc. (Tetra Tech) to provide technical support to the ADEE-DEQ Brownfields Program under Contract 4600054308, AFIN: 39-00541. ADEE-DEQ requested that Tetra Tech conduct an Analysis of Brownfield Cleanup Alternatives (ABCA) of the Former First National Bank (the Site) at 3 North Poplar Street, Marianna, Lee County, Arkansas (Appendix A, Figure 1).

The Site previously hosted a commercial building that was in the process of being demolished when a windstorm blew over most of the building. The Site is within a mixed-use commercial area, with commercial properties adjacent to the north, south, and west, and the downtown public city park to the east. The Site appears on the Marianna, Arkansas U.S. Geological Survey (USGS) 7.5-minute topographic series map (USGS 1984) (Appendix A, Figure 1). Coordinates at the approximate center of the Site is 34°46'25.11"N and 90°45'28.21"W. The Site encompasses approximately 0.12 acres on one parcel of land. Figure 2 in Appendix A illustrates the Site boundaries.

Tetra Tech performed this ABCA based on the U.S. Environmental Protection Agency's (EPA) approval to clean up the Site, including collection and disposal of debris containing asbestos-containing material (ACM). All remaining debris from the demolished building at the Site must be removed before the Site can be used and renovated.

The City of Marianna owns the Site and intends to use it as a small park. This ABCA considered state and federal regulations regarding ACM. The federal Asbestos Hazard Emergency Response Act (AHERA) defines ACM as any material or product that contains more than 1 percent asbestos. Arkansas Pollution Control and Ecology Commission (APC&EC) regulations outline ACM inspection, reporting, and disposal requirements for demolition or renovation of buildings (APC&EC 2015).

2.0 BACKGROUND AND DESCRIPTION

The City of Marianna currently owns the Site, which is within a mixed-use commercial area and is bounded north by a building owned by the Historical Society currently under construction (27 North Poplar Street); east by North Poplar Street and the Marianna Court Square; south by West Main Street; and west by Hickman & Herron CPAs, LLC (18 West Main Street). The Site includes one approximately 5,200-square-foot, former building footprint with the remaining demolished debris confined to the previous building's basement.

The Site lies within the city limits of Marianna, Arkansas. This discussion of the Site history derives from the Site's Arkansas Brownfield Program Application completed on September 16, 2024 (City of Marianna 2024) and the Site's Phase I Environmental Site Assessment (ESA) completed on December 23, 2024 (Tetra Tech 2024). According to the Brownfield Application, the building was built in 1931. In January 2025, the City of Marianna purchased the Site (Lee County 2025).

3.0 PREVIOUS INVESTIGATIONS

Tetra Tech conducted a Phase I Environmental Site Assessment (ESA) of the former First National Bank at 3 North Poplar Street in Marianna, Arkansas, on behalf of ADEE-DEQ (Tetra Tech 2024). The Phase I ESA identify two recognized environmental conditions (RECs) for the Site. The RECs consisted of 1) demolition debris piled at the site may have been coated with lead-based paint (LBP) or contained polychlorinated biphenyls (PCBs), which would have been released into the soil; and 2) a historical gas station was upgradient of the site and had no record of tank status. Additionally, one business environmental risk (BER) was identified for the Site. The BER was demolition debris remains at the site and based on a 2024 survey, demolition debris contains ACM, and may contain PCBs or be coated with LBP. Proper disposal of hazardous materials in the building remnants and debris from the former subject property building will be necessary, in accordance with local, state, and federal regulations.

No other assessments are known to have occurred at the Site.

Environmental Protection Associates conducted an Asbestos Survey in 2024 (Environmental Protection Associates 2024). Results of the investigation are discussed in Section 5.1.

4.0 PLANS FOR FUTURE USE

The City of Marianna currently owns the Site, which is within a mixed-use commercial area, with commercial properties adjacent to the north, south, and west, and with the downtown city park to the east. The Site includes a pile of remaining demolished debris from the former building on the Site confined within the former building's basement.

Given that ACM waste remains on the Site, confined to the basement there, remediation appears warranted. ACM waste should be appropriately addressed prior to the City's plan to use the property as a small park. No remedial activities have occurred at the Site.

5.0 POTENTIAL CLEANUP ALTERNATIVES

The overall goal of any brownfields cleanup action is to address environmental conditions preventing or impeding the preferred type of Site redevelopment, and to do so in a manner protective of human health and the environment. This ABCA considered presence of ACM at the Site, applied AHERA definitions, and conformed to APC&EC requirements for ACM inspection, reporting, and disposal for demolition or renovation of commercial buildings.

Two RECs were identified during the Phase I ESA; however, a Phase II ESA has not been performed at the Site. As a result, no contaminated environmental media, besides the ACM present at the Site, has been identified. As a result, this ABCA only considers cleanup alternatives for ACM identified by Environmental Protection Associates in 2024.

Tetra Tech evaluated brownfields cleanup alternatives to address environmental effects identified during the Asbestos Survey Report (Environmental Protection Associates 2024). The purpose of this ABCA was to present viable cleanup alternatives based on Site-specific conditions, technical feasibility, and preliminary cost evaluations.

The following sections describe brownfields cleanup alternatives for addressing presence of ACM, including a “No Action” alternative. Following the description, each alternative is evaluated in terms of its effectiveness, implementability, and cost. Purposes of evaluating each alternative were to determine its advantages and disadvantages relative to the other alternatives, and to identify key tradeoffs that would affect selection of a preferred alternative.

Effectiveness of an alternative refers to its ability to meet objectives of a brownfield cleanup. Criteria applied to assess effectiveness of an alternative include all the following:

- Overall protection of human health and the environment
- Long-term effectiveness
- Reduction of toxicity, mobility, or volume through treatment/removal
- Short-term effectiveness.

Criteria applied to assess implementability of an alternative are all the following:

- Technical feasibility
- Administrative feasibility
- Availability of services and materials required during implementation of the alternative
- State acceptance
- Community acceptance.

Each alternative is evaluated to determine its estimated cost. The evaluations compare the alternatives' respective direct capital costs, which include equipment, services, and contingency allowances, as well as longer-term institutional controls (ICs), engineering controls (ECs), and operations and maintenance (O&M) costs. Again, purposes of evaluating each alternative were to determine its advantages and disadvantages relative to other alternatives, and to identify key tradeoffs that would affect selection of the preferred alternative.

5.1 EVALUATED CONTAMINATION

This section discusses contaminants and materials identified in the Asbestos Survey Report regarding the Site. Additional details about sampling methodology and detected constituents are in the Asbestos Survey Report (Environmental Protection Associates 2024).

During the ACM survey, Environmental Protection Associates collected bulk samples of suspected ACM from collapsed building structure on the Site. Collection of samples of building materials accorded with National Emissions Standards for Hazardous Air Pollutants (NESHAP) as adopted by EPA, and with AHERA protocols. Samples of suspected ACM were analyzed via polarized light microscopy (PLM). AHERA defines ACM as any material or product that contains more than 1% asbestos.

This Survey identified ACM in the following materials:

- Linoleum, floor tile (with mastic) and painted fibrous materials (approximately 4,000 Square Feet [SF]) located in the debris pile.

5.2 EVALUATION OF CLEANUP ALTERNATIVES FOR ACM

Evaluations of cleanup alternatives are based on potential future use scenarios at the Site. Tetra Tech developed three cleanup alternatives for ACM to indicate alternatives for abatement of all debris was ACM waste, as well as segregating out and dispose to debris as ACM and non-ACM waste.

Regarding ACM, three options were evaluated: (1) no action, (2) removal and disposal of all debris as ACM, and (3) segregation and disposal of ACM waste and non-ACM waste. Alternatives 2 and 3 are expected to achieve clearance criteria under APC&EC requirements.

Notably, cost assumptions for Alternatives 2 and 3 assume contingencies and should not be considered as actual cost estimates. Costs may depend on contractor availability, scheduling, material availability, labor issues, or other factors. Therefore, the cost estimates shown below are presented only for comparison of alternatives. Project management and administrative costs are not included.

5.2.1 Alternative 1: No Action (Baseline)

The no action alternative is included as a baseline for comparison to the other proposed alternatives. Alternative 1 (No Action) would leave ACM in place at the Site.

Effectiveness

This alternative would be ineffective in achieving the goal of reducing health risks. In accordance with NESHAP regulations, renovation of the Site cannot proceed before proper abatement. Any redevelopment of areas containing ACM would have to be restricted to ensure that those materials remain undisturbed. Therefore, no demolition activities during renovation of areas with ACM could occur if this alternative would be selected.

Implementation

Implementation of this alternative is straightforward—ACM left in place. Future redevelopment would have to consider the location and condition of the ACM, and ensure that those materials remain undisturbed.

Cost

This alternative would not involve any direct costs.

5.2.2 Alternative 2: Removal of all Debris as ACM

Alternative 2 would involve proper removal of all the Site's building debris as ACM waste. Removal of the Site's debris as ACM waste by a licensed State of Arkansas asbestos abatement contractor would accord with applicable local, state, and federal regulations and a pre-approved Remedial Action Plan (RAP). Area air sampling would occur according to a pre-approved quality assurance project plan (QAPP), and APC&EC possibly would conduct pre/post-abatement visual inspections (if required).

Effectiveness

Removal of all debris as ACM under Alternative 2 would meet the applicable or relevant and appropriate requirements (ARARs) established by the NESHAP regulation and APC&EC, and would address the risk to human health posed by ACM. In addition, debris removal as ACM waste would allow redevelopment of the Site without restrictions pertaining to disturbance of ACM.

Implementation

Debris removal as ACM waste by a licensed State of Arkansas asbestos abatement contractor would accord with applicable local, state, and federal regulations. EPA, state, and Occupational Safety and Health Administration (OSHA) requirements must be met during removal of ACM. A Health and Safety Plan would address these regulations.

Cost

Table 1 breaks down the total cost for this alternative. Estimated total cost of Alternative 2 is approximately $74,410. Estimated abatement costs were gathered from local vendors. Listed costs include removal and

disposal. Estimated cost for removal of all debris as ACM waste associated with the Site buildings is $45,000. This estimate does not include restoration costs. Additional costs to be considered include those for three technical reports (RAP, QAPP, and Final Abatement Report) and for abatement oversight, air monitoring, and clearance activities. Estimated cost of technical plans/reports is $6,470 per plan/report (costs of plans include consideration of all environmental issues to be addressed by cleanup activities). Additional costs for oversight and clearance sampling are considered variable based on requirements and duration of abatement. Estimated cost associated with oversight and clearance is $10,000.

TABLE 1

ACM ALTERNATIVE 2 – TOTAL COSTS

Line Item	Cost
Abatement of asbestos-containing material (ACM)	$45,000
Development of Remedial Action Plan (RAP)	$6,470
Development of Quality Assurance Project Plan (QAPP)	$6,470
Final Abatement Report	$6,470
Oversight and clearance sampling	$10,000
Total Alternative 2 Cost	**$74,410**

5.2.3 Alternative 3: Segregation and Disposal of ACM Waste and Non-ACM Waste

Alternative 3 would involve segregating the debris into categories based on the results of the previous asbestos survey and then removing positive ACM and sending it for disposal accordingly. Segregation would be completed by a licensed State of Arkansas asbestos abatement contractor would accord with applicable local, state, and federal regulations.

After identification and segregation of ACM and non-ACM materials on the Site, abatement of ACM would take place. Abatement is required before any ACM is disturbed or removed. Abatement by a licensed State of Arkansas asbestos abatement contractor would accord with applicable local, state, and federal regulations and a pre-approved RAP. Regulatory area air sampling would occur according to a QAPP, and APC&EC possibly would conduct pre/post-abatement inspections (if required).

Effectiveness

Segregation and removal of all identified ACM under Alternative 3 would meet the ARARs established by the NESHAP regulation and APC&EC and would address the risk to human health posed by ACM. This alternative would be effective without necessity to treat all debris as ACM waste. This alternative would also be effective in achieving the goal of reducing health risks and would allow redevelopment of the Site.

Implementation

Implementation of this alternative would include a longer timeframe for the abatement to be completed, due to the meticulous nature of the identifying the ACM within the pile of building debris before it can be disposed of properly. Abatement of ACM by a licensed State of Arkansas asbestos abatement contractor would accord with applicable local, state, and federal regulations. EPA, state, and OSHA requirements must be met during removal of ACM. A Health and Safety Plan would address these regulations.

Cost

Table 2 breaks down the total cost for Alternative 3. Estimate segregation and abatement cost for ACM waste and non-ACM waste were gathered from local vendors. Estimated cost for segregation and abatement of ACM waste and non-ACM waste within the Site's basement is $55,000. This estimate does not include restoration costs. Additional costs to be considered include those for three technical reports (RAP, QAPP, and Final Abatement Report) and for clearance sampling. Estimated cost of technical plans/reports is $6,470 per plan/report (cost of plans includes consideration of all environmental issues to be addressed by cleanup activities). Additional costs for oversight and clearance sampling are considered variable based on requirements and duration of abatement. Estimated cost associated with oversight and clearance is $15,000. Estimated total cost of Alternative 3 is $89,410.

TABLE 2

ACM ALTERNATIVE 3 – TOTAL COSTS

Line Item	Cost
Segregation and Abatement of ACM waste and non-ACM waste	$55,000
Development of RAP	$6,470
Development of QAPP	$6,470
Final Abatement Report	$6,470
Oversight and clearance sampling	$15,000
Total Alternative 3 Cost	**$89,410**

5.3 RECOMMENDED CLEANUP ALTERNATIVES

This section summarizes and recommends cleanup alternatives for ACM at the Site.

5.3.1 Summary of ABCA Alternatives

Table 3 summarizes cleanup alternatives for ACM at the Site.

TABLE 3

SUMMARY OF ABCA ALTERNATIVES

Criterion	Alternative 1 No Action	Alternative 2 Removal of All Debris as ACM Waste	Alternative 3 Segregation and Abatement of ACM Waste and non-ACM Waste
Effectiveness	Poor	Excellent	Excellent
Protection of human health and the environment	Not protective	Protective	Protective
Long-term effectiveness	Poor	Excellent	Excellent
Reduction of toxicity, mobility, or volume	Poor	Excellent	Good
Short-term effectiveness	Excellent	Excellent	Poor
Implementability	Excellent	Very good	Good
Technical feasibility	Excellent	Very good	Good
Administrative feasibility	Not applicable	Good	Good
Availability of services	Not applicable	Excellent	Excellent
State acceptance	Poor	Meets goal	Meets goal
Community acceptance	Poor	Excellent	Good
Cost	$0	$74,410	$89,410

5.3.2 Recommended ABCA Alternative

Alternative 2 (Removal of all Debris as ACM Waste) is the recommended cleanup alternative for ACM. Removal of all ACM waste found within the basement on the Site would be required prior to initiation of any substantial renovation activities.

5.3.3 Total Cleanup Cost

Table 4 summarizes cleanup costs for the recommended alternative assuming future non-residential land use. Estimated total cleanup cost of the recommended cleanup alternative is $74,410. As stated above, costs for new construction, Site restoration, and any associated disposal costs for addressing construction and demolition waste materials have not been included in this ABCA.

TABLE 4

SUMMARY OF COSTS FOR RECOMMENDED ALTERNATIVE

Contaminant / Material	Recommended Alternative	Action – Cost	Total Cost
Asbestos-containing Material (ACM)	Alternative 2 – Removal of all Debris as ACM Waste	Abatement – $45,000	
		Oversight and Clearance Sampling – $10,000	
		Technical Reporting – $19,410	
Total Cost			**$74,410**

6.0 REFERENCES

Agency for Toxic Substance and Disease Registry (ATSDR). 2008. “Asbestos: Health Effects.” Accessed December 13, 2012. http://www.atsdr.cdc.gov/asbestos/asbestos/health_effects

Arkansas Pollution Control and Ecology Commission (APC&EC). 2015. Regulation No. 21. Arkansas Asbestos Abatement Regulation. September 11.

City of Marianna. 2024. Former First National Bank Building, Arkansas Brownfields Program Application Form. September 16.

Environmental Protection Associates. 2024. Asbestos Survey. January 16.

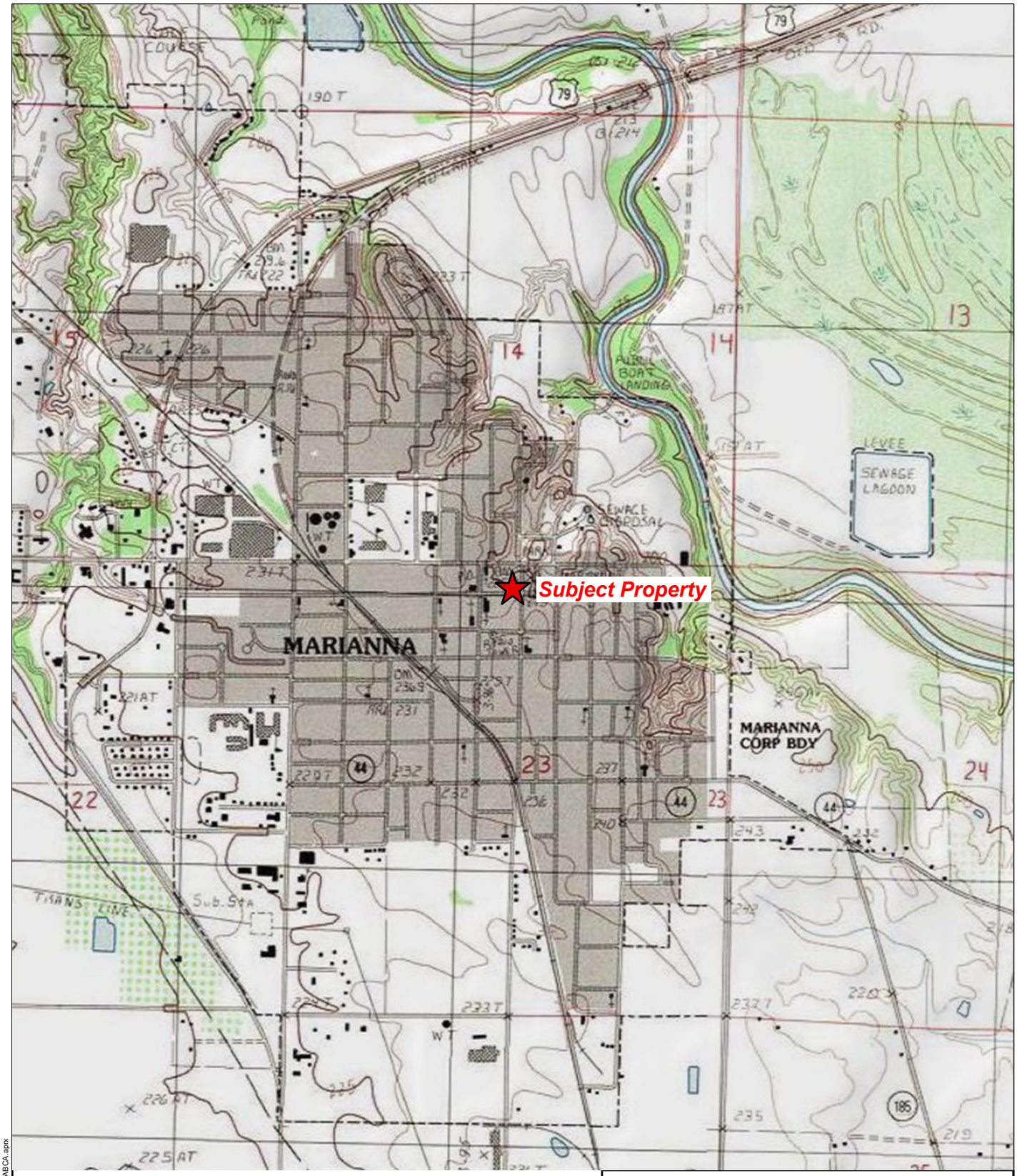
Lee County. 2025. Real Estate Records Search, The City of Marianna, 3 North Poplar, Marianna, AR 72360. Accessed on March 25, 2025. https://www.arcountydata.com/parcel.asp?item=32DE77&Page=1&countycode=LEETAX

Tetra Tech, Inc. (Tetra Tech). 2024. Phase I Environmental Site Assessment Report, 3 North Poplar Street, Marianna, Arkansas. December.

U.S. Geological Survey (USGS). 1984. Marianna, Arkansas Quadrangle. USGS 7.5-Minute Topographic Series.

APPENDIX A: FIGURES

FIGURE 1 SITE LOCATION MAP



N

0 1,000 2,000

Feet

Source: USGS Marianna, AR 7.5 Minute Topo Quad, 1984; USGS Soudan, AR 7.5 Minute Topo Quad, 1984

Former First National Bank
3 North Poplar Street
Marianna, Arkansas

Figure 1
Site Location Map

TETRA TECH

Date: 3/19/2025 Drawn By: Susmita Shrestha Project No: 103S9501011.001

X:\S\9501011\Projects\aprx\Former_First_National_Bank_ABCA.aprx

FIGURE 2 SITE LAYOUT MAP

Legend

Property Boundary

N

0 50 100

Feet

Source: ESRI, ArcGIS Online, World Imagery, 2024

Former First National Bank
3 North Poplar Street
Marianna, Arkansas

Figure 2
Site Layout Map

TETRA TECH

Date: 3/19/2025 Drawn By: Susmita Shrestha Project No: 103S9501011.001

X:\S\9501\011\Projects\aprx\Former_First_National_Bank_ABCA.aprx

ATTACHMENT 1: ASBESTOS SURVEY REPORT

Environmental Protection Associates

#9 Remington Cove
Little Rock, Arkansas 72204
Phone: 501-562-3818
Fax: 501-562-5701
Toll Free: 1-800-530-7706

Asbestos Survey

To:	Mayor, Ora Stevens 35 Poplar Street Marriana, AR	**From:**	Gary Nooner
Email:	Mayororastevens@gmail.com		
Fax:		**Date:**	January 16, 2024
Phone:	1-870-295-2508	**Pages:**	14 Including cover sheet
Cell:			
Re:	Collapsed Structure 3 North Poplar Street	**cc:**	

Comments

Environmental Protection Associates

#9 Remington Cove
Little Rock, Arkansas 72204
501-562-3818
Fax 501-562-5701

January 16, 2024

35 Poplar Street
Marriana, AR

RE: Asbestos Survey
Collapsed Structure
3 North Poplar Street
Marianna, AR

Mayor, Ora Stephens

On January 10, 2024 at your request we collected samples from the above referenced location to determine if asbestos was present. Seventeen (17) samples were collected for laboratory analysis.

Laboratory analysis of these samples have determined the following:

Asbestos Detected in the following Materials

	Description	**Location**	
Sample # 01 & 02	Linoleum	Debris Pile	Approx. '+/- 4,000 Sft.
# 06, 07, 08, 09, 10	Floor Tile and Mastic	Debris Pile	See Above
Sample # 16	Painted Fibrous Material	Debris Pile	See Above

Federal and state regulations with the exception of OSHA, determine a material to be asbestos containing if it contains 1% or more asbestos. OSHA states that any amount is an asbestos material.

Therefore the following materials must be removed by a licensed asbestos contractor if disturbed by renovation or demolition.

The entire Debris Pile

For further clarification of the Arkansas asbestos regulation 21. You may contact the Arkansas Department of Environmental Quality (ADEQ) Phone - 501-682-0718 or visit their website at - www.adeq.state.ar.us

I have attached my chain of custody and laboratory findings. Please contact me with any Questions you may have.

Sincerely,

Gary Nooner
Inspector
License No. 005065

Enclosures

Associates

501-562-3818
Fax 501-562-5701

Field Data Sheet

AL2401306

Client	Property		
Mayor, Ora Stephens	Collapsed Structure	Inspector	Gary Nooner / Richard McKay
35 Poplar Street	3 North Poplar Street	Building ID	
Marriana, AR	Marianna, AR	Date	1/10/2024
		Turnaround Time	Rush (24 hour)

SAMPLE ID	HA	Sample Description Example: FT1- 12 x 12 white Floor tile	Sample Location	A	C	♦	Class (S,T,M)	Friability (F, NF)	Condition (G, D, SD)	Damage (%)	POT. DAM (L, M, H)	Quantity
01		Linoleum	Debris Pile	X			M	NF	SD	90%	H	+/- 4,000 sft
02		Linoleum	Debris Pile			X	M	NF	SD	90%	H	See Above
03		Roofing	Debris Pile	X			M	NF	SD	90%	H	See Above
04		Roofing	Debris Pile			X	M	NF	SD	90%	H	See Above
05		Roofing	Debris Pile			X	M	NF	SD	90%	H	See Above
06		Floor Tile and Mastic	Debris Pile	X			M	NF	SD	90%	H	See Above
07		Floor Tile and Mastic	Debris Pile			X	M	NF	SD	90%	H	See Above
08		Floor Tile and Mastic	Debris Pile			X	M	NF	SD	90%	H	See Above
09		Floor Tile and Mastic	Debris Pile			X	M	NF	SD	90%	H	See Above
10		Floor Tile and Mastic	Debris Pile			X	M	NF	SD	90%	H	See Above
11		Ceiling Tile	Debris Pile	X			M	F	SD	90%	H	See Above
12		Ceiling Tile	Debris Pile			X	M	F	SD	90%	H	See Above
13		Plaster	Debris Pile	X			M	NF	SD	90%	H	See Above
14		Plaster	Debris Pile			X	M	NF	SD	90%	H	See Above
15		Plaster	Debris Pile			X	M	NF	SD	90%	H	See Above
16		Painted Fibrous Material	Debris Pile	X			M	NF	SD	90%	H	See Above
17		Black Mastic on Brick	Debris Pile	X			M	NF	SD	90%	H	See Above

HA - Homogeneous Area **A - Analyze** **C - Catalogue** **♦ - Analyze only if the previous sample was found to be negative.**

Class: S-surfacing, **T**-thermal, **M**-miscellaneous. **Friability: F**-friable, **NF**-non-friable. **Condition: G**-good, **D**-damaged, **SD**-severely damaged. **POT. DAM** (Potential Damage): **L**-low, **M**-moderate, **H**-high

Relinquished By	Richard McKay	Time 09:00	Date 1-11-24	Relinquished By 10:30AM	Time Date
Received By		Time	Date	Received By JAN 12 2024	Time Date

Comments: **Composite Sample all positive Sheetrock and Joint Compound Samples**

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Materials Characterization - Bulk Asbestos Analysis

Laboratory Analysis Report - Polarized Light

Environmental Protection Associates
#9 Remington Cove
Little Rock, AR 72204

Attn: Gary Nooner
Customer Project: Collapsed Structure, 3 North Poplar Stree
Reference #: CAL2401306AS Date: 01/12/24

Analysis and Method

Summary of polarized light microscopy (PLM / Stereomicroscopy bulk asbestos analysis) using the methods described in 40CFR Part 763 Appendix E to Subpart E (Interim and EPA 600 / R-93 / 116 (Improved). The sample is first viewed with the aid of a stereomicroscope. Numerous liquid slide preparations are created for analysis under the polarized microscope where identifications and quantifications are preformed. Calibrated liquid refractive oils are used as liquid mouting medium. These oils are used for identification (dispersion staining). A calibrated visual estimation is reported, should any asbestiform mineral be present. Other techniques such as acid washing are used in conjugation with refractive oils for detection of smaller quantities of asbestos. All asbestos percentages are based on calibrated visual estimation traceable to NIST standards for regulated asbestos. Traceability to measurement and calibration is achieved by using known amounts and types of asbestos from standards where analyst and laboratory accuracy are measured. As little as 0.001% asbestos can be detected in favorable samples, while detection in unfavorable samples may approach the detection limit of 0.50% (well above the laboratory definition of trace).

Discussion

Vermiculite containing samples may contain trace amounts of actinolite/tremolite. When not detected by PLM, these samples should be analyzed using TEM methods and / or water separation techniques. Suspected actinolite/vermiculite presence will be indicated through the sample comment section of this report.

Fibrous talc containing samples may contain a regulated asbestos fiber known as anthophyllite. Under certain conditions the same fiber may actually contain both talc and anthophyllite (a phenomenon called intergrowth). Again, TEM detection methods are recommended. CA Labs PLM report comments will denote suspected amounts of asbestiform anthophyllite with talc, where further analysis is recommended.

Some samples (floor tiles, surfacings, etc.) may contain fibers too small to be detectable by PLM analysis and should be analyzed by TEM bulk protocols.

A "trace asbestos" will be reported if the analyst observes far less than 1% asbestos. CA Labs defines "trace asbestos" as a few fibers detected by the analyst in several preparations and will indicate as such under these circumstances.

Since allowable variation in quantification of samples close to 1% is high, <1% may be reported. Such results are ideal for point counting, and the technique is mandatory for friable samples (NESHAP, Nov. 1990 and clarification letter 8 May 1991) under 1% percent asbestos or "trace asbestos". **In order to make all initial PLM reports issued from CA Labs NESHAP compliant, all <1% asbestos results (except floor tiles) will be point counted at no additional charge.**

Qualifications

CA Labs is accredited by the National Voluntary Accreditation Program (NVLAP) for selected test methods for airborne fiber analysis (TEM), and for bulk asbestos fiber analysis (PLM). CA Labs is also accredited by AIHA LAP, LLC. in the PLM asbestos field of testing for Industrial Hygiene. All analysts have completed college courses or hold a degree in a natural science (geology, biology, or environmental science). Recognition by a state professional board in one these disciplines is preferred, but not required. Extensive in-house training programs are used to augment the educational background of the analyst. The Laboratory Director and Quality Manager have received supplemental McCrone Research training for asbestos identification. Analysis performed at Crisp Analytical Labs, LLC 1929 Old Denton Road Carrollton, TX 75006

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235
AIHA LAP, LLC Laboratory #102929

CA Labs
Dedicated to Quality

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Phone 225-751-5632
Fax 225-751-5634

Overview of Project Sample Material Containing Asbestos

Customer Project: Collapsed Structure, 3 North Poplar Street **CA Labs Project #:** CAL2401306AS

Laboratory Sample ID	Sample #	Layer #	Analysts Physical Description of Subsample	Asbestos type / calibrated visual estimate percent	List of Affected Building Material Types
2643	01	*1-1*	***Linoleum**/ tan linoleum*	***18% Chrysotile***	***tan linoleum***
2648	06	*6-2*	*green floor tile*	***4% Chrysotile***	***green floor tile***
2648		*6-3*	*black mastic*	***2% Chrysotile***	***black mastic***
2658	16	*16-1*	***Fibrous Material**/ blue surfaced tan compound*	***2% Chrysotile***	***blue surfaced tan compound***

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235
AIHA LAP, LLC Laboratory #102929

Glossary of abbreviations (non-asbestos fibers and non-fibrous minerals):

ca - carbonate
gypsum - gypsum
bi - binder
or - organic
ma - matrix
mi - mica
ve - vermiculite
ot - other
pe - perlite
qu - quartz
fg - fiberglass
mw - mineral wool
wo - wollastinite
ta - talc
sy - synthetic
ce - cellulose
br - brucite
ka - kaolin (clay)
pa - palygorskite (clay)

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CA Labs
Dedicated to Quality

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Carrollton, TX 75006
Phone 972-242-2754
Fax 972-242-2798

CA Labs, L.L.C.
12232 Industriplex, Suite 32
Baton Rouge, LA 70809
Phone 225-751-5632
Fax 225-751-5634

Polarized Light Asbestiform Materials Characterization

Customer Info: **Attn:** Gary Nooner
Environmental Protection Associates
#9 Remington Cove
Little Rock, AR 72204

Phone # 501-562-3818
Fax #

Customer Project:
Collapsed Structure, 3 North Poplar Street
Turnaround Time:
24 Hours

CA Labs Project #:
CAL2401306AS

Date: 1/12/2024
Samples Rec'd: 1/12/24 10:30AM
Date Of Sampling: 1/10/2024
Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homogeneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
2643	01		*1-1*	***Linoleum**/ tan linoleum*	*y*	***18% Chrysotile***	20% ce 2% fg	60% gy,ma
2644	02		*2-1*	***Linoleum**/ brown linoleum*		*Positive Stop*		
2645	03		*3-1*	***Roofing**/ black felt*	*y*	***None Detected***	40% ce	60% qu,bi
2646	04		*4-1*	***Roofing**/ black tar and black felt*	*n*	***None Detected***	35% ce	65% qu,bi
2647	05		*5-1*	***Roofing**/ black roofing shingle with white gravel*	*n*	***None Detected***	6% ce 6% fg	88% qu,bi
2647			*5-2*	*black tar and black felt*	*n*	***None Detected***	35% ce	65% qu,bi
2648	06		*6-1*	***Floor Tile and Mastic**/ black foam insulation*	*y*	***None Detected***		100% ot

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235

AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). *All samples received in good condition unless noted.*
Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion attaining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gy - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:

John Monaco
Analyst

Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
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4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze
6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

CA Labs
Dedicated to Quality

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Carrollton, TX 75006
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CA Labs Project #:
CAL2401306AS

Date: 1/12/2024
Samples Rec'd: 1/12/24 10:30AM
Date Of Sampling: 1/10/2024
Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homogeneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
2648			*6-2*	*green floor tile*	*y*	***4% Chrysotile***		96% qu,ca
2648			*6-3*	*black mastic*	*y*	***2% Chrysotile***		98% gy,bi
2649	07		*7-1*	***Floor Tile and Mastic**/ black foam insulation*		*Not Analyzed*		
2649			*7-2*	*green floor tile*		*Positive Stop*		
2649			*7-3*	*black mastic*		*Positive Stop*		
2650	08		*8-1*	***Floor Tile and Mastic**/ green floor tile*		*Positive Stop*		
2650			*8-2*	*black mastic*		*Positive Stop*		

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235

AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). *All samples received in good condition unless noted.*
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or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:

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Julio Robles

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Polarized Light Asbestiform Materials Characterization

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Turnaround Time:
24 Hours

CA Labs Project #:
CAL2401306AS

Date: 1/12/2024
Samples Rec'd: 1/12/24 10:30AM
Date Of Sampling: 1/10/2024
Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homogeneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
2651	09		*9-1*	***Floor Tile and Mastic**/ off-white compound*		*Not Analyzed*		
2651			*9-2*	*green floor tile*		*Positive Stop*		
2651			*9-3*	*black mastic*		*Positive Stop*		
2652	10		*10-1*	***Floor Tile and Mastic**/ green floor tile*		*Positive Stop*		
2652			*10-2*	*black mastic*		*Positive Stop*		
2653	11		*11-1*	***Ceiling Tile**/ white surfacing*	*y*	***None Detected***		100% qu,bi
2653			*11-2*	*tan ceiling tile*	*y*	***None Detected***	35% ce 35% fg	30% qu,pe,ca

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235

AIHA LAP, LLC Laboratory #102929

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116). *All samples received in good condition unless noted.*
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or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:

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Analyst

Technical Manager
Tanner Rasmussen

Senior Analyst
Julio Robles

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Polarized Light Asbestiform Materials Characterization

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Little Rock, AR 72204

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CA Labs Project #:
CAL2401306AS

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Date Of Sampling: 1/10/2024
Purchase Order #:

Laboratory Sample ID	Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homogeneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
2654	12		*12-1*	***Ceiling Tile**/ white surfacing*	*y*	***None Detected***		100% qu,bi
2654			*12-2*	*tan ceiling tile*	*y*	***None Detected***	35% ce 35% fg	30% qu,pe,ca
2655	13		*13-1*	***Plaster**/ off-white finishing plaster*	*y*	***None Detected***		100% qu,ca
2655			*13-2*	*gray plaster*	*y*	***None Detected***		100% qu,ca
2656	14		*14-1*	***Plaster**/ off-white finishing plaster*	*y*	***None Detected***		100% qu,ca
2656			*14-2*	*brown plaster*	*y*	***None Detected***		100% qu,ca
2657	15		*15-1*	***Plaster**/ off-white finishing compound*	*y*	***None Detected***		100% qu,ca

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235

AIHA LAP, LLC Laboratory #102929

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Technical Manager
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2657			*15-2*	*gray concrete*	*y*	***None Detected***		100% qu,ca,ot
2657			*15-3*	*tan finishing compound*	*y*	***None Detected***		100% qu,ca
2657			*15-4*	*brown plaster*	*y*	***None Detected***		100% qu,ca
2658	16		*16-1*	***Fibrous Material**/ blue surfaced tan compound*	*n*	***2% Chrysotile***		98% qu,bi,ca
2658			*16-2*	*brown fibrous paneling*	*y*	***None Detected***	100% ce	
2659	17		*17-1*	***Mastic**/ red bricking*	*y*	***None Detected***		100% qu,ot
2659			*17-2*	*black mastic*	*y*	***None Detected***		100% gy,bi

Dallas NVLAP Lab Code 200349-0 TEM/PLM TDSHS 30-0235

AIHA LAP, LLC Laboratory #102929

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Technical Manager
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Senior Analyst
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STATE OF ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

Division of Environmental Quality

OFFICE OF AIR QUALITY, ASBESTOS PROGRAM

GARY NOONER

having satisfied the requirements necessary to meet the provisions of AHERA/ASHARA under TSCA Title II and the Arkansas Pollution Control and Ecology Commission's Rule 21 pursuant to AC.A. § 20-27-1001, et seq., within the State of Arkansas is hereby certified to perform activities related to asbestos containing material in the following discipline(s)

Discipline	Issue Date	Effective Date	Expiration Date
Air Monitor	12/05/2023	12/12/2023	12/31/2024
Contractor Supervisor	12/05/2023	12/12/2023	12/31/2024
Inspector	12/04/2023	12/12/2023	12/31/2024
Project Designer	12/06/2023	12/12/2023	12/31/2024

Certification Number: **005065**

Caleb J. Osborne
Division of Environmental Quality, Director
Chief Administrator, Environment
Arkansas Department of Energy & Environment

STATE OF ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT

Division of Environmental Quality

OFFICE OF AIR QUALITY, ASBESTOS PROGRAM

ENVIRONMENTAL PROTECTION ASSOCIATES (EPA)

having qualified as required by law in accordance with the rules adopted by the Arkansas Pollution Control and Ecology Commission's Rule 21 pursuant to AC.A 20-27-1001, et seq., relative to performing asbestos related work within the State of Arkansas is licensed as an

Asbestos Abatement Contractor

License Number: 000020

Issue Date: 11/30/2023
Expiration Date: 12/1/2024

Caleb J. Osborne
Division of Environmental Quality, Director
Chief Administrator, Environment
Arkansas Department of Energy & Environment

License No. 0003060424

ID #1964

State of Arkansas

Commercial Contractors Licensing Board

ENVIRONMENTAL PROTECTION ASSOCIATES OF RUSSELLVILLE, INC.
9 REMINGTON COVE
LITTLE ROCK, AR 72204

This is to Certify That ENVIRONMENTAL PROTECTION ASSOCIATES OF RUSSELLVILLE, INC.

is duly licensed under the provisions of Ark. Code Ann. § 17-25-101 et. seq. as amended and is entitled to practice Contracting in the State of Arkansas within the following classifications/specialties:

BUILDING
- (COMMERCIAL & RESIDENTIAL)
SPECIALTY
Asbestos
Environmental General

This contractor has an unlimited suggested bid limit.

from May 19, 2023 **until** April 30, 2024 **when this Certificate expires.**

Witness our hands of the Board, dated at North Little Rock, Arkansas:

GREAT SEAL OF THE STATE OF ARKANSAS

CHAIRMAN

SECRETARY

May 19, 2023 - dsa

CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY): 1/3/2024

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER
Sterling Seacrest Pritchard, Inc.
4601 East McCain Blvd
Suite B
North Little Rock AR 72117

CONTACT NAME:
PHONE (A/C, No, Ext): 501-588-0857 **FAX (A/C, No):**
E-MAIL ADDRESS:

INSURER(S) AFFORDING COVERAGE	NAIC #
INSURER A : Arch Specialty Insurance Company	21199
INSURER B : Lafayette Insurance	18295
INSURER C : Berkley Casualty Company	15911
INSURER D :	
INSURER E :	
INSURER F :	

INSURED ENVIPRO-02
Environmental Protection Associates of Russellville, Inc.
9 Remington Cove
Little Rock AR 72204

COVERAGES **CERTIFICATE NUMBER:** 626015020 **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS	
A	X COMMERCIAL GENERAL LIABILITY	Y	Y	12EMP2232804	12/31/2023	12/31/2024	EACH OCCURRENCE	$ 1,000,000
	[ ] CLAIMS-MADE [X] OCCUR						DAMAGE TO RENTED PREMISES (Ea occurrence)	$ 100,000
	X Blkt Contractual						MED EXP (Any one person)	$ 5,000
	X XCU Included						PERSONAL & ADV INJURY	$ 1,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER.						GENERAL AGGREGATE	$ 2,000,000
	X POLICY [X] PRO-JECT [ ] LOC						PRODUCTS - COMP/OP AGG	$ 2,000,000
	OTHER:							$
B	AUTOMOBILE LIABILITY	Y	Y	60521561	12/31/2023	12/31/2024	COMBINED SINGLE LIMIT (Ea accident)	$ 1,000,000
	X ANY AUTO						BODILY INJURY (Per person)	$
	[ ] OWNED AUTOS ONLY [ ] SCHEDULED AUTOS						BODILY INJURY (Per accident)	$
	X HIRED AUTOS ONLY [X] NON-OWNED AUTOS ONLY						PROPERTY DAMAGE (Per accident)	$
								$
A	X UMBRELLA LIAB [X] OCCUR	Y	Y	12EMX2232904	12/31/2023	12/31/2024	EACH OCCURRENCE	$ 5,000,000
	EXCESS LIAB [ ] CLAIMS-MADE						AGGREGATE	$ 5,000,000
	DED X RETENTION $ 0							$
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY Y / N		Y	AMWC408701	12/31/2023	12/31/2024	X PER STATUTE [ ] OTH-ER	
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? [ ] N / A						E.L. EACH ACCIDENT	$ 1,000,000
	(Mandatory in NH)						E.L. DISEASE - EA EMPLOYEE	$ 1,000,000
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. DISEASE - POLICY LIMIT	$ 1,000,000
A	Pollution Incl Mold Professional Liability			12EMP2232804	12/31/2023	12/31/2024	Limit Per Incident Aggregate	1,000,000 2,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)
Reference Number: 200189892.
The following applies when required in a written contract or agreement: Certificate holder and owner are included as additional insureds on a primary and non-contributory basis with respect to General Liability (including completed operations), Auto Liability, Professional Liability, and Umbrella. Waiver of subrogation is provided on General Liability, Auto Liability, Umbrella, Professional Liability, and Workers Compensation.

CERTIFICATE HOLDER
International Paper Company, its subsidiaries and affiliated Companies
PO Box 100085 - IP
Duluth GA 30096

CANCELLATION
SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

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