TETRA TECH

April 8, 2025

Mr. Jonathan Burns, Project Manager
Arkansas Department of Energy and Environment
Division of Environmental Quality
Office of Land Resources
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
Phone: 501-682-0028
Email: Jonathan.D.Burns@arkansas.gov

Subject: **Quality Assurance Project Plan/Work Plan**
Asbestos Abatement Oversight
Former First National Bank
3 North Poplar Street
Marianna, Lee County, Arkansas 72360
Project No.: 103S9501011

Dear Mr. Burns:

Tetra Tech, Inc. is pleased to submit the attached Quality Assurance Project Plan/Work Plan for Asbestos Abatement Oversight at the Former First National Bank at 3 North Poplar Street in Marianna, Arkansas. If you have any questions or comments regarding this submittal, please feel free to call me at (816) 412-1766.

Sincerely,

Allie Cook
Project Manager

Enclosure

QUALITY ASSURANCE PROJECT PLAN/WORK PLAN FOR ASBESTOS ABATEMENT OVERSIGHT

FORMER FIRST NATIONAL BANK
3 NORTH POPLAR STREET
MARIANNA, ARKANSAS 72360

On-Call Environmental Services Contract
Contract No. 4600054308

Prepared For:

Arkansas Department of Energy and Environment
Division of Environmental Quality
Office of Land Resources
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

April 8, 2025

Prepared By:

Tetra Tech, Inc.
400 W Capitol, Suite 1700
Little Rock, AR 72201
(501) 492-3403

APPROVED BY

Michael Williams, Program Manager	4/8/2025 Date
Heather Wood, Quality Assurance Manager Digitally signed by Heather Wood Date: 2025.04.10 10:15:11 -05'00'	Date
Addie McClain, ADEE-DEQ Brownfields Program Coordinator	4/10/2025 Date
Jonathan Burns, ADEE-DEQ Project Manager	4/10/2025 Date
Elizabeth Reyes, EPA Region 6 Regional Project Officer ELIZABETH REYES Digitally signed by ELIZABETH REYES Date: 2025.04.17 09:12:26 -05'00'	Date

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1.0 PROJECT MANAGEMENT

Tetra Tech, Inc. (Tetra Tech) prepared this Quality Assurance Project Plan (QAPP)/Work Plan (WP) for employees performing the asbestos-containing materials (ACM) abatement (Abatement) of the Former First National Bank at 3 North Poplar Street in Marianna, Lee County, Arkansas (the Site). The QAPP/WP outlines procedures to be implemented to ensure that acquired data meet project requirements.

The following sections describe various facets of project management for the Abatement:

1.1 DISTRIBUTION LIST

Arkansas Dept. of Energy & Environment, Division of Environmental Quality (ADEE-DEQ)	Addie McClain, Brownfields & Site Assessment Supervisor
ADDE-DEQ	Jonathan Burns, Project Manager (PM)
U.S. Environmental Protection Agency (EPA), Region 6	Elizabeth Reyes, Project Officer
Tetra Tech	Allie Cook, PM
Tetra Tech	Michael Williams, Program Manager
Tetra Tech	Heather Wood, Quality Assurance (QA) Manager
Tetra Tech	Jeffery Mitchell, Vice President, Operations Manager

1.2 PROJECT AND TASK ORGANIZATION

ADEE-DEQ tasked Tetra Tech to conduct the Abatement at the Site.

The following are roles of key people on the project:

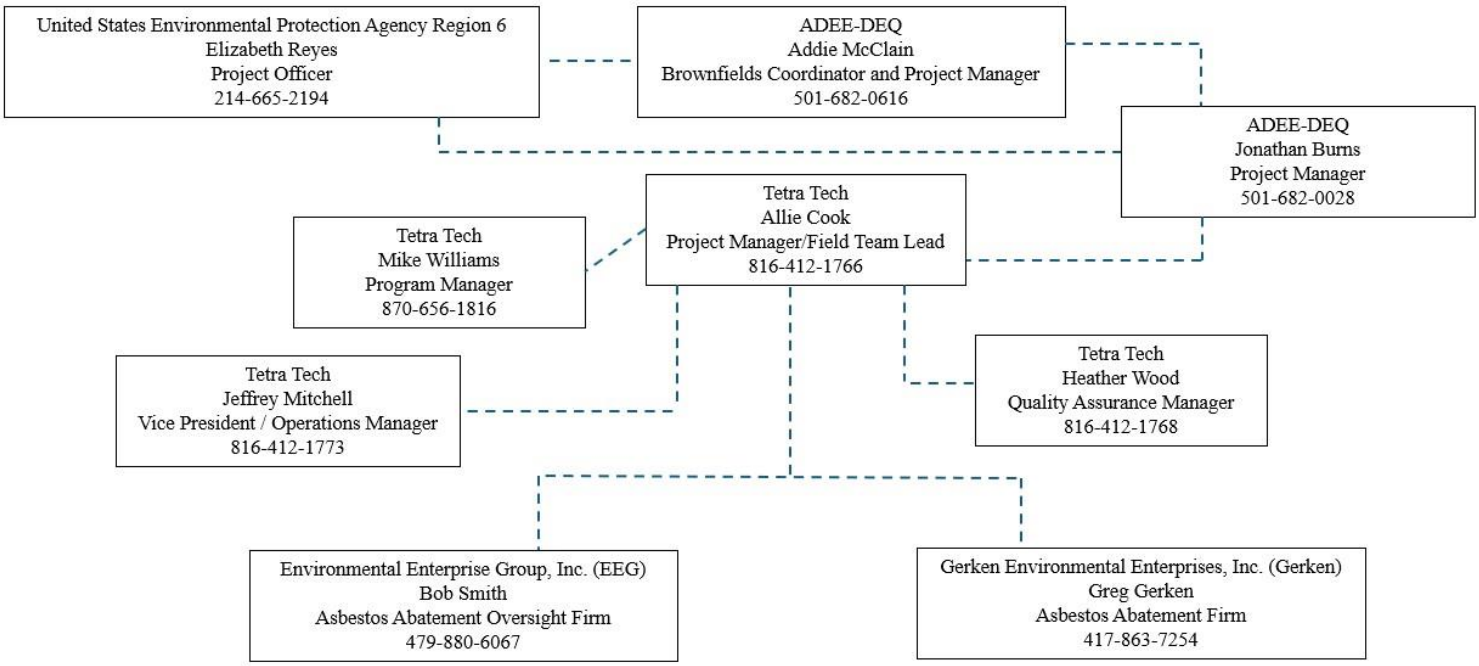
- Addie McClain, ADEE-DEQ Brownfields and Site Assessment Supervisor, will oversee the program.
- Jonathan Burns, ADEE-DEQ PM, will serve as the primary liaison between ADEE-DEQ and EPA. He will oversee the project and the program and will serve as the primary point of contact between ADEE-DEQ and Tetra Tech. Mr. Burns will be the State's PM for this activity, and will be responsible for review of project plans, including the QAPP/WP and final deliverables, to help ensure compliance with the Federal Cooperative Agreement that funds this project.
- Elizabeth Reyes, Project Officer with EPA Region 6, will coordinate with EPA's Regional Quality Assurance Manager (RQAM) to review and approve the QAPP/WP to ensure scientific integrity of planned activities and compliance with EPA's data quality standards.
- Allie Cook will serve as the Tetra Tech PM of survey activities described in this QAPP/WP. She will be responsible for ensuring implementation of field activities described in this QAPP/WP and providing periodic updates to ADEE-DEQ concerning the status of the project, as needed.
- Michael Williams will serve as the Tetra Tech Program Manager.

- Heather Wood will serve as the Tetra Tech QA Manager and provide technical assistance, as needed, to ensure that necessary QA issues are adequately addressed.
- Jeffery Mitchell will serve as the Tetra Tech officer and technical advisor.

Preparation of this QAPP/WP has accorded with the specific EPA quality documents including *Quality Assurance Project Plan Standard* (CIO 2105-S-02.0 dated July 18, 2023), which replaces *EPA Requirements for Quality Assurance Project Plan* (QA/R-5). Procedures described in this QAPP/WP may be altered in the field if warranted by site-specific conditions or unforeseen impediments that prevent or hinder implementation of any aspect of this QAPP/WP. Such deviations will be recorded on field sheets. This QAPP/WP will be available to the field team at all times during sampling activities to serve as a key reference to proposed activities described herein.

1.3 PROJECT ORGANIZATION CHART

The project organization chart appears below.



1.4 STOP WORK ORDER

In the event of unsafe work conditions and/or safety violations, such as a situation that poses an immediate risk, all workers have the authority and responsibility to issue a Stop Work Order.

2.0 SITE BACKGROUND

ADEE-DEQ contracted Tetra Tech to conduct area asbestos air monitoring during abatement (removal of ACM in the Site building).

2.1 SITE LOCATION AND DESCRIPTION

The Site hosted the former bank (First National Bank) that was in the process of being demolished when a windstorm blew over most of the building, and the City of Marianna plans to use the property as a small park. Currently, a small pile of building rubble and debris from the previous building is confined to the previous basement on the Site. Assumption according to Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 21, Arkansas Asbestos Abatement Regulation (APC&EC 2015), was that the pile of debris contained asbestos-containing materials (ACM), and therefore all building debris from the Site was to be treated as ACM waste. The Site encompasses roughly 5,230 square feet (SF) or 0.12 acres. The center of this area is at 34°46'25.11"N and 90°45'28.21"W. The Site Location and Layout Maps are on Figure 1 and Figure 2, respectively, in Appendix A.

The Site is bordered 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) in Marianna, Arkansas. Based on Tetra Tech's review of aerial imagery (Google Earth 2025), the Site is surrounded by commercial properties and a city park to the east.

The City of Marianna applied to be part of the Arkansas Brownfield Program, with the application (dated September 16, 2024) completed by Ms. Ora Barnes Stevens, City of Marianna Mayor. The City of Marianna is interested in redeveloping the Site.

2.2 PREVIOUS INVESTIGATIONS AND SURVEYS

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 of 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.

Environmental Protection Associates performed an Asbestos Survey in 2024 (Environmental Protection Associates 2024). Environmental Protection Associates collected bulk samples of suspected ACM from the 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 Asbestos Hazards Emergency Response Act (AHERA) of 1986 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. The Environmental Protection Associates' Asbestos Survey report is included in Attachment 1.

This Asbestos Survey identified ACM in the following materials:

- Linoleum, floor tile and painted fibrous materials (approximately 4,000 SF) located in the debris pile

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

3.0 PROJECT SCOPE

This section defines the problem that the project will address and describes anticipated ACM abatement activities.

3.1 PROBLEM DEFINITION

Tetra Tech prepared an Analysis of Brownfield Cleanup Alternatives (ABCA) (Tetra Tech 2025). The selected alternative was abatement of all waste. Because the asbestos survey determined ACM is present in the collapsed building debris, all the building debris is assumed to be ACM waste and will be removed as such.

Tetra Tech prepared this QAPP/WP for sampling activities associated with abatement, intended to address concerns that could affect human health and the environment, and possible redevelopment at the Site. This QAPP/WP presents the recommended framework for the abatement, including sampling and oversight as necessary of an abatement contractor engaged to remove ACM.

3.2 ASBESTOS ABATEMENT ACTIVITIES

Federal and state regulations define ACM as any building material with asbestos content exceeding 1.0 percent (%). This Survey will follow Title 40 *Code of Federal Regulations* (40 CFR) Part 763 or EPA Asbestos Hazard Emergency Response Act (AHERA) / National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines, and State of Arkansas regulations to confirm presence of ACM that must be removed prior to renovation or demolition activities.

All building debris is designated as ACM waste and shall be removed by a licensed State of Arkansas asbestos abatement contractor following APC&EC Regulation No. 21, Arkansas Asbestos Abatement Regulation (APC&EC 2015).

3.3 AIR MONITORING DURING ABATEMENT ACTIVITIES

The licensed abatement contractor will conduct all personal monitoring of abatement workers required by the Occupational Safety and Health Administration (OSHA) for the ACM abatement at the Site. Both the licensed abatement contractor and the oversight air sampling contractor will meet all required certifications specified in the APC&EC regulations, which outline ACM inspection, reporting, and disposal requirements for demolition or renovation of buildings (APC&EC 2015).

Abatement work is to include removal of all building debris as ACM present on the Site. The ACM will be removed from the Site and sent for disposal as both friable and non-friable asbestos-containing waste.

Personal air monitoring will occur to determine employees' exposure (outside and respirator) to airborne fibers. OSHA's Asbestos Standard (29 *Code of Federal Regulations* [CFR] 1926.1101) requires representative daily personal monitoring during abatement projects. Moreover, every worker shall have the right to know the asbestos concentrations to which he/she is exposed and what measures are in place to protect the abatement worker. Data from personal air monitoring will serve to verify effectiveness of removal engineering techniques for achieving minimal employee exposure. During asbestos abatement projects, Tetra Tech will provide a licensed State of Arkansas Asbestos Air Monitor with experience in air sampling to collect area samples outside any containment and/or regulated areas within which asbestos abatement is occurring. Area sampling will occur to verify effectiveness of dust suppression from the removal site. Air samples will be analyzed via Phase Contrast Microscopy (PCM) according to National Institute of Occupational Safety and Health (NIOSH) Method 7400.

4.0 MEASUREMENT AND DATA ACQUISITION

The following sections discuss design and implementation of measurement and acquisition of data:

4.1 AREA AIR SAMPLING FOR ASBESTOS

Asbestos abatement activities will include area air monitoring/sampling to verify effectiveness of containment and/or engineering controls in place. Under the supervision of Tetra Tech, Environmental Enterprise Group, Inc. (EEG) will conduct the area air sampling and abatement oversight. EEG anticipates collection of as many as four area air samples (two samples and two blanks) around the work area during each day of the abatement project. Abatement is anticipated to take 3 business days.

Area air sampling will conform to the EPA sampling protocol in *Guidelines for Controlling Asbestos Containing Materials in Buildings* (EPA 1985). All samples will be stored in plastic bags pending analysis on the Site for asbestos fiber concentration.

The samples will remain in the inspector's custody until completion of on-site analysis. Upon completion of sampling activities, EEG will analyze the area air samples for asbestos fibers concentration according to NIOSH Method 7400 via PCM or according to Method 7402 via Transmission Electron Microscopy (TEM). EEG is a certified Asbestos Abatement Consultant, license number 000234-CCL-CT. All relevant EEG certifications are in Attachment 2.

4.2 SAMPLE HANDLING AND CUSTODY REQUIREMENTS

Air samples will undergo on-site analysis. EEG will complete necessary paperwork for all samples.

4.3 ANALYTICAL METHODS REQUIREMENTS

All samples will be analyzed according to the subcontracted on-site laboratory's standard operating procedures (SOPs) and analytical methods referenced in the QAPP. Standard detection limits for those methods will be adequate for this project. Appropriate containers and physical/chemical preservation techniques will be applied during field activities to help verify acquisition of representative analytical results. Table 1 lists analytical methods to be applied.

TABLE 1

ANALYTICAL METHODS

SAMPLE MEDIUM	ANALYTICAL METHOD
Air	NIOSH Method 7400 or 7402

Notes:

NIOSH National Institute of Occupational Safety and Health

EEG will be responsible for any corrective action that may be necessary per analysis SOPs.

4.4 QUALITY CONTROL

The QA objective for this project is to develop data of sufficient quality and quantity to design comprehensive response actions in accordance with applicable regulations cited in this QAPP/WP. Specific data quality objectives are discussed in terms of accuracy, precision, completeness, representativeness, and comparability.

The scope of work (SOW) for the proposed air monitoring abatement activities will require quality control (QC) samples for accuracy and precision, by use of blanks (lot blank and field blank).

Data completeness will be expressed as the percentage of data generated that is considered valid. A completeness goal of 100 percent will be applied to this project; however, if that goal is not met, site decisions may still be made based on the remaining data. Data comparability is achieved by requiring that all data generated for the project be reported in common units.

Representativeness of collected samples is facilitated by establishing and following criteria and procedures identified in this QAPP/WP. Section 3.0 outlines criteria and procedures for this Survey.

For additional details regarding precision, accuracy, representativeness, completeness, and comparability, refer to Sections 7.4 through 7.6. Table 2 lists the type of data to be generated and specific reporting units.

TABLE 2

SPECIFIC DATA REPORTING UNITS

Parameter	Unit
Area Air Monitoring sampling by laboratory analysis	Fibers per cubic centimeter (f/cc)

4.5 SPECIAL TRAINING REQUIREMENTS AND CERTIFICATION

All personnel working on the Site will be required to have completed a basic 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training course and annual refreshers. All personnel collecting samples will also be certified as Arkansas Air Monitors. Gerken Environmental Enterprises, Inc. (Gerken) will provide licensed State of Arkansas Asbestos Workers and Contractor/Supervisors to complete the abatement work.

4.6 DOCUMENTATION AND RECORDS

During the Abatement, EEG will maintain field sheets to record all pertinent activities associated with abatement and air monitoring activities. Appropriate documentation pertaining to photographs taken by EEG also will be recorded on the field sheets. Information pertaining to all samples (such as sampling dates, locations, and so on) collected during this event will be recorded on the field sheets. Unique sample identifications (IDs) will be designated, and chain-of-custody (COC) records will be completed and maintained for all samples from time of sample collection until analysis of the samples at the on-site laboratory.

Prior to field activities, EEG and Gerken will prepare a health and safety plan (HASP) addressing site-specific hazards. All field personnel will review and sign the HASP prior to field work, indicating that they understand the plan and its requirements. Copies of the plan will be available to all personnel throughout sampling activities. In addition, the Abatement contractor (Gerken) will provide a HASP for its personnel. EEG will coordinate with Gerken to make sure all parties maintain a safe work environment.

The PM will make available the approved QAPP/WP to all personnel throughout sampling activities by Tetra Tech and its subcontractors.

EEG will provide the completed COC submitted with the ACM samples, along with results from analyses of the air samples. These air sample results will indicate asbestos fibers content in fibers per cubic centimeter (f/cc).

Tetra Tech will maintain electronically all final reporting documents for a minimum of 10 years; the end user will maintain those documents for an undetermined amount of time.

4.7 INSTRUMENT, EQUIPMENT TESTING, INSPECTION, AND MAINTENANCE REQUIREMENTS

Prior to deployment for field activities, Tetra Tech personnel and/or EEG personnel will test, inspect, and maintain all sampling equipment and supplies, along with field screening instrumentation. Testing, inspection, and maintenance of analytical instrumentation will accord with manufacturers'

recommendations and laboratory procedures. Field testing equipment includes air monitoring equipment. Any testing, inspection, or maintenance activities regarding the equipment will be documented on field sheets and logbooks for individual sampling activities.

4.8 INSPECTION AND ACCEPTANCE REQUIREMENTS FOR SUPPLIES AND CONSUMABLES

Certificates of analysis will be provided with sampling supplies and reviewed by the field sampling team before initiation of sampling.

4.9 DATA ACQUISITION REQUIREMENTS

Tetra Tech has compiled previously obtained data and information pertaining to the Site from various sources (including other analytical data, reports, photographs, and maps referenced in this QAPP/WP). Some of those data have not been verified; however, that unverified information will not be used for decision-making purposes without verification of its authenticity.

5.0 DATA MANAGEMENT

This section discusses maintenance of acquired data and sampling handling and tracking.

5.1 MAINTENANCE OF ACQUIRED DATA

Tetra Tech will maintain all laboratory data acquired from the subcontracted laboratory in the project files. All data acquired during field work will be maintained on field sheets. All field sheets will be maintained in the project files in electronic versions only. Project files are routinely reviewed for quality purposes to ensure proper management of information and resources. Based on the small size of this project, no specialized hardware or software requirements apply.

5.2 SAMPLE HANDLING AND TRACKING

All sample collection and handling phases will conform to established custody protocols if further sampling is needed. Each sample will remain in the sampler's possession following collection until given to another party. Recorded on COC forms will be date(s) and time(s) of sample collection, name of the sampler, and names of all other individuals who oversaw collected samples. The COC form also will include specifications for analysis. Trained staff will collect samples. The samplers will take precautions to avoid incorrect handling that would taint samples. Staff will package samples, seal them in suitable containers, and maintain the sealed containers under COC. The COC will include a record of sample receipt by on-site laboratory personnel prior to analysis by that laboratory. Samples will remain under COC throughout the period of analysis to ensure preservation of their integrity.

6.0 ASSESSMENT AND OVERSIGHT

The following sections discuss assessment and oversight of sampling activities:

6.1 ASSESSMENTS AND RESPONSE ACTIONS

Corrective action will be taken at the discretion of the ADEE-DEQ PM whenever problems appear that could adversely affect data quality or resulting decisions affecting future actions pertaining to the Site. Field audits may be conducted by Tetra Tech or ADEE-DEQ.

Laboratory managers will be responsible for any corrective action that may be necessary per individual laboratory SOPs.

6.2 CORRECTIVE ACTION

Corrective actions refer to a series of steps implemented to address or modify a process that results in errors, nonconforming issues, or occurrences which may affect quality of data. Corrective action may be necessary during data assessment, sample analysis, and fieldwork. If necessary, such action will be directed by the Tetra Tech PM or ADEE-DEQ PM.

6.3 SAMPLE COLLECTION/FIELD MEASUREMENTS

If the scope of the activity changes, or if unforeseen circumstances require changing sampling and/or field procedures, corrective action may be required in the field. Any suspected field technical issues must be reported by field staff to the Tetra Tech PM or Tetra Tech Field Supervisor. Assessment of potential issues identified by ADEE-DEQ will fall under authority of the Tetra Tech PM. When necessary, the Tetra Tech PM will record non-conformance via email correspondence and will take corrective action as appropriate.

6.4 REPORTS TO MANAGEMENT

Tetra Tech will prepare a formal report that (1) describes abatement activities; (2) identifies sampling techniques, locations, and problems encountered (with resolutions to those problems); (3) interprets analytical results following completion of field activities described herein; and (4) verifies validation of laboratory data. Laboratory data from area air samples and clearance air samples will be compared to the EPA threshold value for air monitoring samples. Field activities and data analysis will conform to requirements in this QAPP/WP, and any deviations from this QAPP/WP will be noted in the report. The report will be submitted to ADEE-DEQ.

7.0 DATA VALIDATION AND USABILITY

The following sections discuss aspects of validating data and determining usability of the data:

7.1 DATA REVIEW, VALIDATION, AND VERIFICATION REQUIREMENTS

A qualified laboratory analyst and the laboratory's section manager will perform data review and verification in accordance with the laboratory's QA program. The Tetra Tech PM will be responsible for overall assessment and final approval of the data, in accordance with the projected use of the results and the SOW. If the data acquired do not cover the entire SOW, the Tetra Tech PM will identify deficiencies and request completion of the SOW before the report is deemed final.

7.2 VALIDATION AND VERIFICATION METHODS

Data validation will accord with the laboratory's established SOPs. Laboratory personnel will perform QC spot checks, as needed. The Tetra Tech PM will be responsible for overall validation and final approval of the data, in accordance with projected use of results.

7.3 RECONCILIATION WITH USER REQUIREMENTS

If data quality indicators do not meet the project's requirements as outlined in this QAPP, the data may be discarded, and re-sampling or re-analysis may be required. The Tetra Tech PM is responsible for directing subsequent activities if data quality objectives are not met.

7.4 PRECISION/ACCURACY

The level of agreement between multiple measurements of the same property under the same or very similar circumstances is known as precision. To assess precision for this project, blind duplicate samples will be gathered and examined in addition to the original investigation samples. Relative percent differences in analytical results between duplicate samples and the corresponding investigation samples will be used to calculate precision.

The degree to which a measurement agrees overall with a known value is called accuracy. It combines the systematic error (bias) and random error (precision) components of sampling and analysis. For this project, accuracy in the field will be preserved by application of EPA sampling protocols, and adherence to the EPA PCM or TEM analytical process will help ensure accuracy of laboratory analysis for asbestos fibers.

7.5 REPRESENTATIVENESS

The degree to which data reliably and exactly represent a feature of a population, parameter fluctuations at a sampling point, or environmental variables is referred to as representativeness in qualitative analysis. EPA sampling protocols, which consider acquisition of data reflective of Site circumstances, specify the sampling strategy for this project. Ensuring overall representativeness of acquired data will necessitate conformance to established sampling and laboratory protocols in addition to the QAPP/WP.

7.6 COMPLETENESS/COMPARABILITY

A measurement system's adequacy is determined by comparing the quantity of valid data acquired to that anticipated under typical circumstances. Completeness in this project is relative and will be evaluated by assessment of conformance to specified laboratory and sampling procedures.

The qualitative term “comparability” refers to the degree of assurance that one set of facts may be compared to another. A high degree of comparability between data sets is the aim of this QAPP. Data comparability will be maximized by adopting standard procedures for sampling and analysis (EPA protocols), reporting data in standard units, and using standard and thorough reporting formats.

8.0 REFERENCES

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

Environmental Protection Associates. 2024. Asbestos Survey. January.

Google Earth. 2025. Aerial Photographs of 3 North Poplar Street, Marianna, Arkansas. Accessed March 25, 2025.

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

Tetra Tech. 2025. Analysis of Brownfield Cleanup Alternatives, Former Frist National Bank at 3 North Poplar Street, in Marianna, Lee County, Arkansas. April.

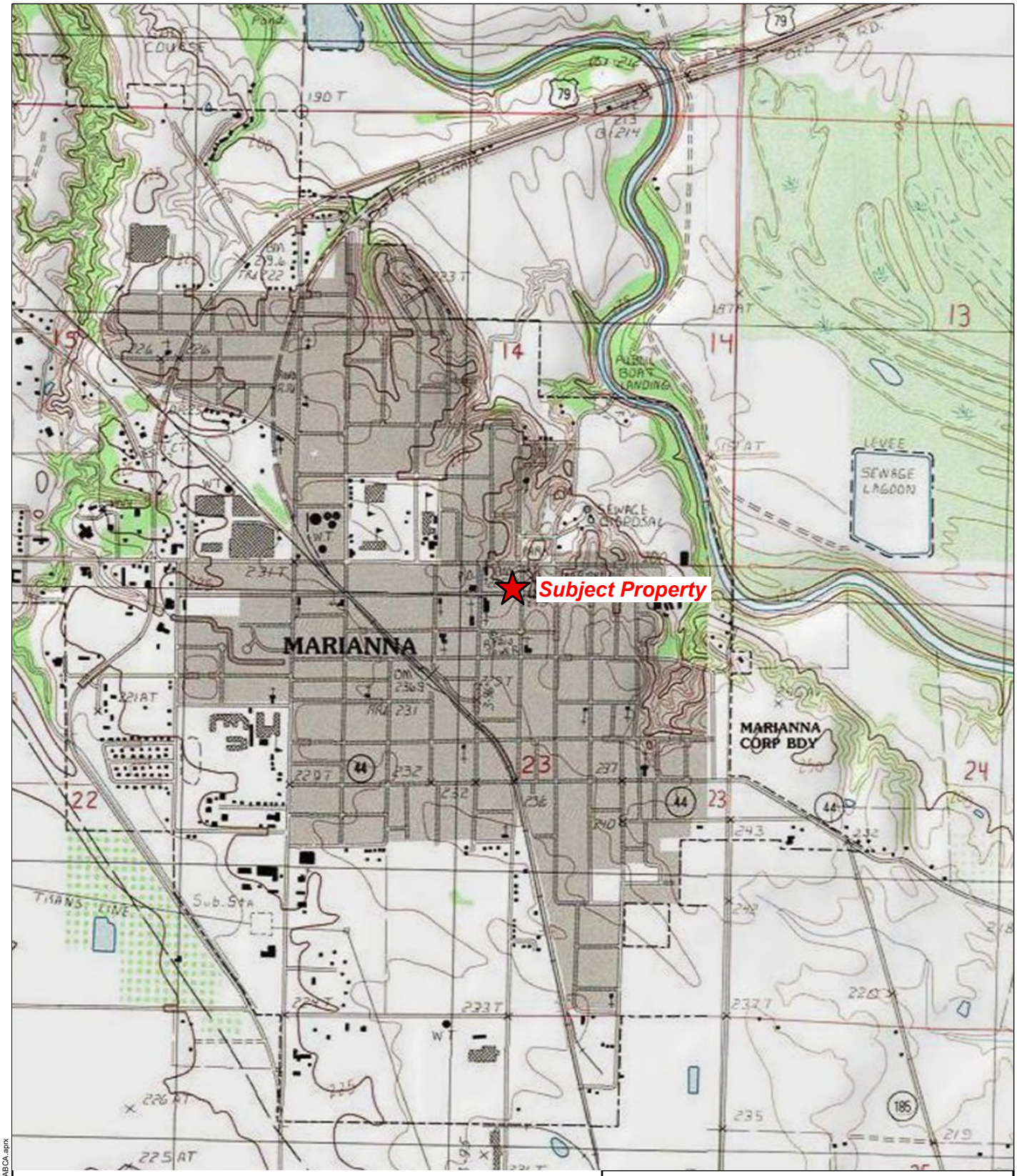
U.S. Environmental Protection Agency (EPA). 2023. *Quality Assurance Project Plan Standard: COI 2015-S-02.0.* July.

EPA. 1985. *Guidelines for Controlling Asbestos Containing Materials in Buildings.* EPA 560/5-85-024. June.

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

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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

ENVIRONMENTAL PROTECTION ASSOCIATES ASBESTOS SURVEY 2024

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**

CA Labs
Dedicated to Quality

Crisp Analytical, L.L.C.
1929 Old Denton Road
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

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

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Baton Rouge, LA 70809
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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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
3. Actinolite in association with Vermiculite
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

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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
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

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bi - binder	ot - other	wo - wollastonite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

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Turnaround Time:
24 Hours

CA Labs Project #:
CAL2401306AS

Date: 1/12/2024
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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
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

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or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

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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

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Turnaround Time:
24 Hours

CA Labs Project #:
CAL2401306AS

Date: 1/12/2024
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Date Of Sampling: 1/10/2024
Purchase Order #:

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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

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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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

ATTACHMENT 2

SUBCONTRACTOR CERTIFICATES

ARKANSAS DIVISION OF ENVIRONMENTAL QUALITY

ASBESTOS PROGRAM

ENVIRONMENTAL ENTERPRISE GROUP (EEG), INC.

is qualified to perform certain asbestos-related work within the State of Arkansas, under Rule 21 of the Arkansas Pollution Control and Ecology Commission and Ark. Code Ann. § 20-27-1001 *et seq.*, and is hereby licensed as an

Asbestos Abatement Consultant

License Number: 000234-CCL-CT

Expiration Date: November 30, 2025

Bailey Taylor

Bailey Taylor
Director, Division of Environmental Quality
Chief Administrator of the Environment
Arkansas Department of Energy and Environment

ARKANSAS DIVISION OF ENVIRONMENTAL QUALITY

ASBESTOS PROGRAM

ROBERT E. SMITH

has satisfied the requirements of AHERA/ASHARA under TSCA Title II, and those of Rule 21 of the Arkansas Pollution Control and Ecology Commission, pursuant to Ark. Code Ann. § 20-27-1001 *et seq.*, and is hereby certified to perform certain asbestos-related work, within the State of Arkansas, in the following discipline(s):

Discipline	Expiration Date
Mgmt Planner	07/31/2025
Proj Designer	08/31/2025
Inspector	07/31/2025
Contractor/Sup	07/31/2025
Air Monitor	07/31/2025

Certification Number: 011927

Bailey Taylor
Interim Director, Division of Environmental Quality
Chief Administrator of the Environment
Arkansas Department of Energy and Environment

ARKANSAS DIVISION OF ENVIRONMENTAL QUALITY

ASBESTOS PROGRAM

GREG MILLSAPS

has satisfied the requirements of AHERA/ASHARA under TSCA Title II, and those of Rule 21 of the Arkansas Pollution Control and Ecology Commission, pursuant to Ark. Code Ann. § 20-27-1001 *et seq.*, and is hereby certified to perform certain asbestos-related work, within the State of Arkansas, in the following discipline(s):

Discipline	Expiration Date
Inspector	07/31/2025
Air Monitor	07/31/2025
Contractor/Sup	07/31/2025

Certification Number: 015533

Bailey Taylor
Interim Director, Division of Environmental Quality
Chief Administrator of the Environment
Arkansas Department of Energy and Environment