

**TO:** Katie Kreps  
Brownfield & Site Assessment Supervisor  
Office of Land Resources, Assessment and Remediation  
Arkansas Energy & Environment, Division of Environmental Quality

**FROM:** Adam Smith, Asbestos Inspector, Harbor

**DATE:** December 20, 2019

**RE:** Asbestos Survey – Former JT Parsons Cabinet Company  
420 West Ohlendorf Road, Osceola, AR 72370

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Harbor was retained to conduct a pre-demolition inspection for asbestos-containing materials (ACM) at the above referenced site in Osceola, Arkansas. The purpose of the inspection was to identify suspect ACM at the facility prior to demolition. Mr. Adam Smith (AR Inspector No. 015579) and Mr. Michael Dollar (AR Inspector No. 017385) performed the inspection on December 3, 2019. The inspection was conducted in accordance with Arkansas Energy & Environment Division of Environmental Quality (DEQ) and National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements. Harbor is a DEQ-licensed asbestos consultant (No. 000477). Inspector and company credentials are presented as Attachment C.

## **1.0 Asbestos Inspection Methodology and Findings**

Inspection procedures were followed in accordance with the USEPA Asbestos Hazard Emergency Response Act (AHERA) or 40 CFR Part 763. Homogeneous areas were identified and suspect materials within each area were categorized as surfacing, thermal system insulation, or miscellaneous. Each material was sampled according to the AHERA protocol. Homogeneous materials are those building materials that, by visual and manual inspection, are similar in texture, color, composition, and use in the building. The condition of each suspect material was assessed in the field by the inspector. The condition of the materials was classified as good, damaged, or significantly damaged.

Federal and state regulatory agencies define ACM as any building material that contains greater than 1% asbestos. The presence and percentage of asbestos can only be determined by laboratory analysis. Samples collected were sent to EMSL Analytical, Inc. (EMSL) in Houston, Texas who participates in the National Institutes for Standards and Testing (NIST) National Voluntary Laboratory Accreditation Program (NVLAP) proficiency testing program (NVLAP No. 101587-0). Samples were analyzed by Polarized Light Microscopy (PLM) by EPA method 600/R/R-93/116. All percentages reported for composition are based on visual estimation or gravimetric determinations. Laboratory reports are provided as Attachment A.

Harbor personnel identified and sampled suspect ACM at the facility. The sampled materials and corresponding laboratory results are provided in Table 1. Photographs of suspect ACM are presented as Attachment B. See drawing HA1 for approximate sample locations.

**Table 1 – Inspection Findings**

Sample No.	Description	Location	Friable/Non-Friable	Condition	Asbestos Results	RACM
R-01	Roofing Material (Black)	Collapsed Roof (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
R-02	Roofing Material (Black)	Collapsed Roof (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
BM-01	Brick Mortar (Gray)	Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
WG-01	Window Glazing (Gray)	Wall (window) (See Drawing HA1)	Friable	Significantly Damaged	None Detected	N/A
<b>BM-02</b>	<b>Brick Mortar (White/Beige)</b>	<b>Wall (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>2% Chrysotile</b>	<b>CAT II</b>
WG-02	Window Glazing (Gray/White)	Wall (window) (See Drawing HA1)	Friable	Significantly Damaged	None Detected	N/A
SL-01	Skylight Material (Beige)	Roof (See Drawing HA1)	Non-Friable	Damaged	None Detected	N/A
<b>WG-03</b>	<b>Window Glazing (White/Beige)</b>	<b>Wall (window) (See Drawing HA1)</b>	<b>Friable</b>	<b>Significantly Damaged</b>	<b>Trace &lt;1% Chrysotile</b>	<b>CAT I</b>
BM-03	Brick Mortar (Beige)	Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
TP-01	Translucent Panel (White/Beige)	High Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
WG-04	Window Glazing (White/Beige)	Wall (window) (See Drawing HA1)	Friable	Significantly Damaged	None Detected	N/A
FD-01	Flexible Duct Connector (Black)	Air Handler Unit (See Drawing HA1)	Non-Friable	Good	None Detected	N/A
<b>FT-01</b>	<b>Layer 1 9 x 9 Floor Tile (Tan)</b>	<b>Floor (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>3% Chrysotile</b>	<b>CAT II</b>
<b>FT-01</b>	<b>Layer 2 Mastic (Black)</b>	<b>Floor (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>5% Chrysotile</b>	<b>CAT II</b>
BI-01	Batt Insulation Backing (Brown/Black)	Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
CT-01	12 x 12 Ceiling Tile (Tan/White)	Ceiling (See Drawing HA1)	Non-Friable	Damaged	None Detected	N/A
BM-04	Brick Mortar (Gray)	Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A

Sample No.	Description	Location	Friable/Non-Friable	Condition	Asbestos Results	RACM
WG-05	Window Glazing (Gray)	Wall (window) (See Drawing HA1)	Friable	Significantly Damaged	None Detected	N/A
SL-02	Skylight Material (Beige)	Roof (See Drawing HA1)	Non-Friable	Good	None Detected	N/A
<b>M-01</b>	<b>Mastic @ Skylight (Gray/Black)</b>	<b>Roof (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>10% Chrysotile</b>	<b>CAT II</b>
R-03	Roofing Material (Gray/White/Black)	Roof (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
PW-01	12" Pipe Joint Wrap (Gray/Tan)	Pipe (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
BM-05	Brick Mortar (Beige)	Wall (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
<b>R-04</b>	<b>Roofing Material (Black)</b>	<b>Collapsed Roof (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>15% Chrysotile</b>	<b>CAT II</b>
WG-06	Window Glazing (Gray)	Wall (glass block window) (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
BM-06	Brick Mortar (Beige)	Wall (See Drawing HA1)	Non-Friable	Good	None Detected	N/A
BM-07	Brick Mortar (Beige)	Wall @ red brick interior (See Drawing HA1)	Non-Friable	Good	None Detected	N/A
<b>FT-02</b>	<b>Layer 1 9 x 9 Floor Tile (Tan)</b>	<b>Floor (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>4% Chrysotile</b>	<b>CAT II</b>
FT-02	Layer 2 Mastic (Yellow)	Floor (See Drawing HA1)	Non-Friable	Significantly Damaged	None Detected	N/A
<b>FT-02</b>	<b>Layer 3 Mastic (Black)</b>	<b>Floor (See Drawing HA1)</b>	<b>Non-Friable</b>	<b>Significantly Damaged</b>	<b>5% Chrysotile</b>	<b>CAT II</b>
BM-08	Brick Mortar (Beige)	Wall @ red brick exterior (See Drawing HA1)	Non-Friable	Good	None Detected	N/A

**Samples BM-02, FT-01, M-01, R-04, and FT-02 contain asbestos above regulated limits. Sample BM-02 appeared to be a block wall repair patch and not part of the original construction of the building. Harbor has determined that this patched area is different from the other brick mortar sampled as the laboratory analysis indicates. Only this area of the building should be handled as ACM during renovation and demolition operations.**

The Arkansas Pollution Control and Ecology Commission Regulation 21 as revised by the Commission as of January 2014, defines Regulated Asbestos-Containing Material (RACM) as:

- (A) Friable asbestos material;
- (B) Category I non-friable ACM that has become friable;
- (C) Category I non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading;
- (D) Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this regulation;
- (E) Category I non-friable resilient floor covering which contains ACM that will be or has been removed by sanding, grinding, cutting, or abrading; or
- (F) Category II mastic which contains ACM that will be removed by sanding, grinding, cutting, or abrading.)

## 2.0 Recommendations

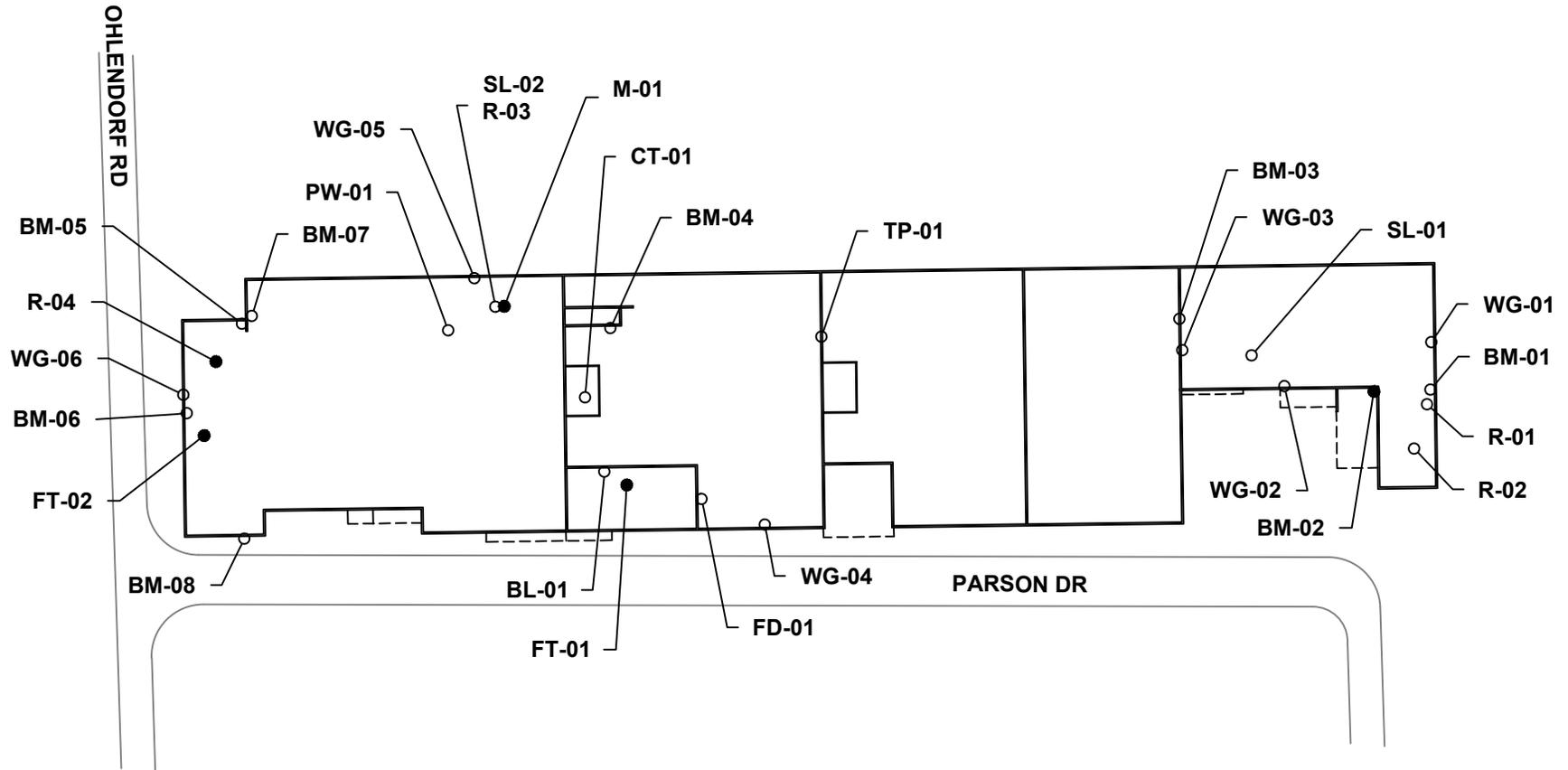
Harbor recommends following DEQ regulations during renovation or demolition. If the materials have the potential to become friable or will be removed by sanding, grinding, cutting or abrading during the renovation project, a project design will be required, along with appropriately certified workers and contracting company. A notice of intent (NOI), along with a copy of the asbestos survey, is required to be filed with DEQ a minimum of 10 days prior to beginning work.

## 3.0 Limitations

ACMs are commonly found in inaccessible building spaces (i.e., crawl spaces, between walls, under floors, behind other building materials, etc.). Harbor recommends a copy of the asbestos inspection be given to the general contractor responsible for renovations or demolition. The contractor should be asked to exercise caution when uncovering primarily inaccessible spaces to prevent disturbance of or damage to unidentified ACM. If a suspect material is uncovered, the contractor should stop work and notify the building owner's representative of the locations of the suspect material. The building owner's representative should then contact Harbor or another appropriately licensed asbestos inspection company to sample the suspect material.

Laboratory analysis of the samples collected by Harbor was performed by EMSL in Houston, Texas. EMSL is solely responsible for all analytical results contained in or referred to in this report.

Harbor does not imply or guarantee that every material on the property, or in the property building, which may potentially have asbestos as a component has been identified and/or sampled. The inspection is intended to identify accessible materials most likely to contain asbestos in quantities subject to regulation.



NO	REVISION DESCRIPTION	DATE
X		X-X-X
X		X-X-X
Date	Drafter	
12-4-19	AES	
HA1	Scale	
	1"=100'	

INSPECTOR: ADAM SMITH  
INSPECTOR NO: 015579  
INSPECTOR: MICHAEL DOLLAR  
INSPECTOR NO: 017385  
CONSULTANT NO: 000477

**LEGEND**

- ASBESTOS POSITIVE
- ASBESTOS NEGATIVE

**NOTES:**

- FEDERAL AND STATE REGULATORY AGENCIES DEFINE AN ASBESTOS-CONTAINING MATERIAL (ACM) AS ANY BUILDING MATERIAL THAT CONTAINS GREATER THAN 1.0% ASBESTOS.

**ATTACHMENT A**

**LABORATORY RESULTS**



# Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

151909111

EMSL ANALYTICAL, INC.  
TESTING LABS • PRODUCTS • TRAINING

PHONE:  
FAX:

Company Name : Harbor		EMSL Customer ID:	
Street: 5800 Evergreen		City: Little Rock	State/Province: AR
Zip/Postal Code: 72205	Country: US	Telephone #: 501.663.8800	Fax #: 501.588.0123
Report To (Name): Adam Smith		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: asmith@harborenv.com		Purchase Order:	
Project Name/Number: ADEQ-19517		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken:		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to:  Same  Different - If Bill to is Different note instructions in Comments\*\*  
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options\* - Please Check

- 3 Hour  6 Hour  24 Hour  48 Hour  72 Hour  96 Hour  1 Week  2 Week

\*For TEM Air 3 hr through 6 hr, please call ahead to schedule. \*There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<b>PCM - Air</b> <input type="checkbox"/> Check if samples are from NY <input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA	<b>TEM - Air</b> <input type="checkbox"/> 4-4.5hr TAT (AHERA only) <input type="checkbox"/> AHERA 40 CFR, Part <input type="checkbox"/> 763 NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312	<b>TEM- Dust</b> <input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)
<b>PLM - Bulk (reporting limit)</b> <input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) Point Count <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) Point Count w/Gravimetric <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%) <input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)	<b>TEM - Bulk</b> <input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5 <b>TEM - Water: EPA 100.2</b> Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking	<b>Soil/Rock/Vermiculite</b> <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<1%) <input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<0.25%) <input type="checkbox"/> TEM EPA 600/R-93/116 with milling prep (<0.1%) <input type="checkbox"/> TEM Qualitative via Filtration Prep <input type="checkbox"/> TEM Qualitative via Drop Mount Prep <input type="checkbox"/> Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only)
<input type="checkbox"/> Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): <input type="checkbox"/> 0.8µm <input type="checkbox"/> 0.45µm

151909111

Samplers Name: Adam Smith

Samplers Signature: *Adam Smith*

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
R-01	Roofing Material		12-3-19/11:25AM
R-02	Roofing Material		12-3-19/11:27AM
BM-01	Brick Mortar		12-3-19/11:30AM
WG-01	Window Glazing		12-3-19/11:31AM
BM-02	Brick Mortar		12-3-19/11:35AM

Client Sample # (s):	-	Total # of Samples: 28
Relinquished (Client): Adam Smith Via Fed Ex	Date: 12-4-19	Time: 8:00 AM
Received (Lab): <i>A Zopen</i>	Date: <i>12/5/19</i>	Time: <i>10:15 AM</i>
Comments/Special Instructions:		

FX 7771 4511 0756



**EMSL ANALYTICAL, INC.**  
TESTING LABS • PRODUCTS • TRAINING

## Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

51909111

PHONE:

FAX:

*Additional Pages of the Chain of Custody are only necessary if needed for additional sample information*

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
WG-02	Window Glazing		12-3-19/11:41AM
SL-01	Skylight Material		12-3-19/11:44AM
WG-03	Window Glazing		12-3-19/11:52AM
BM-03	Brick Mortar		12-3-19/11:55AM
TP-01	Translucent Panel		12-3-19/12:05PM
WG-04	Window Glazing		12-3-19/12:18PM
FD-01	Flexible Duct Connector		12-3-19/12:23PM
FT-01	Tan 9" x 9" Floor Tile with Black Mastic		12-3-19/12:28PM
BI-01	Batt Insulation Backing		12-3-19/12:29PM
CT-01	Ceiling Tile 12" x 12"		12-3-19/12:34PM
BM-04	Brick Mortar		12-3-19/12:36PM
WG-05	Window Glazing		12-3-19/12:46PM
SL-02	Skylight Material		12-3-19/12:51PM
M-01	Black Mastic at Skylight		12-3-19/12:52PM
R-03	Roofing Material		12-3-19/12:53PM
PW-01	12" Pipe Joint Wrap		12-3-19/12:59PM
BM-05	Brick Mortar		12-3-19/1:03PM
R-04	Roofing Material		12-3-19/1:06PM
WG-06	Window Glazing at Glass Block Window		12-3-19/1:03PM
BM-06	Brick Mortar		12-3-19/1:14PM
BM-07	Brick Mortar at Red Brick (interior)		12-3-19/1:16PM
FT-02	Tan 9" x 9" Floor Tile with Black Mastic		12-3-19/1:18PM
BM-08	Brick Mortar at Red Brick (exterior)		12-3-19/1:46PM
*Comments/Special Instructions:			



# EMSL Analytical, Inc.

5950 Fairbanks N. Houston Rd. Houston, TX 77040

Tel/Fax: (713) 686-3635 / (713) 686-3645

<http://www.EMSL.com> / [houstonlab@emsl.com](mailto:houstonlab@emsl.com)

EMSL Order: 151909111

Customer ID: HARB78

Customer PO:

Project ID:

**Attention:** Adam Smith  
Harbor Environmental & Safety  
5800 Evergreen Drive  
Little Rock, AR 72205

**Phone:** (501) 663-8800

**Fax:** (501) 588-0123

**Received Date:** 12/05/2019 10:15 AM

**Analysis Date:** 12/10/2019

**Collected Date:** 12/03/2019

**Project:** ADEQ-19517

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
R-01 <small>151909111-0001</small>	Roofing Material	Brown/Black Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
R-02 <small>151909111-0002</small>	Roofing Material	Brown/Black Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
BM-01 <small>151909111-0003</small>	Brick Mortar	Gray Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
WG-01 <small>151909111-0004</small>	Window Glazing	Gray Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
BM-02 <small>151909111-0005</small>	Brick Mortar	White/Beige Non-Fibrous Homogeneous		20% Ca Carbonate 78% Non-fibrous (Other)	2% Chrysotile
WG-02 <small>151909111-0006</small> <i>Inseparable paint / coating layer included in analysis</i>	Window Glazing	Gray/White Non-Fibrous Heterogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
SL-01 <small>151909111-0007</small>	Skylight Material	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
WG-03 <small>151909111-0008</small>	Window Glazing	White/Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	<1% Chrysotile
BM-03 <small>151909111-0009</small>	Brick Mortar	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
TP-01 <small>151909111-0010</small>	Translucent Panel	White/Beige Fibrous Homogeneous	40% Glass	60% Non-fibrous (Other)	None Detected
WG-04 <small>151909111-0011</small>	Window Glazing	White/Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
FD-01 <small>151909111-0012</small>	Flexible Duct Connector	Black Fibrous Homogeneous	10% Synthetic	90% Non-fibrous (Other)	None Detected
FT-01-Floor Tile <small>151909111-0013</small>	Tan 9"x9" Floor Tile with Black Mastic	Tan Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
FT-01-Mastic <small>151909111-0013A</small>	Tan 9"x9" Floor Tile with Black Mastic	Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
BI-01 <small>151909111-0014</small>	Batt Insulation Backing	Brown/Black Fibrous Homogeneous	70% Cellulose 5% Glass	25% Non-fibrous (Other)	None Detected
CT-01 <small>151909111-0015</small>	Ceiling Tile 12"x12"	Tan/White Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected

Initial report from: 12/10/2019 13:42:50



# EMSL Analytical, Inc.

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EMSL Order: 151909111

Customer ID: HARB78

Customer PO:

Project ID:

## Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
BM-04 <small>151909111-0016</small>	Brick Mortar	Gray Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
WG-05 <small>151909111-0017</small>	Window Glazing	Gray Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
SL-02 <small>151909111-0018</small>	Skylight Material	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
M-01 <small>151909111-0019</small>	Black Mastic at Skylight	Gray/Black Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
R-03 <small>151909111-0020</small>	Roofing Material	Gray/White/Black Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
PW-01 <small>151909111-0021</small>	12" Pipe Joint Wrap	Gray/Tan Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
BM-05 <small>151909111-0022</small>	Brick Mortar	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
R-04 <small>151909111-0023</small> <i>Inseparable paint / coating layer included in analysis</i>	Roofing Material	Black Fibrous Heterogeneous		85% Non-fibrous (Other)	15% Chrysotile
WG-06 <small>151909111-0024</small>	Window Glazing at Glass Block Window	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
BM-06 <small>151909111-0025</small>	Brick Mortar	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
BM-07 <small>151909111-0026</small>	Brick Mortar at Red Brick (Interior)	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
FT-02-Floor Tile <small>151909111-0027</small>	Tan 9"x9" Floor Tile with Black Mastic	Tan Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
FT-02-Mastic 1 <small>151909111-0027A</small>	Tan 9"x9" Floor Tile with Black Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
FT-02-Mastic 2 <small>151909111-0027B</small>	Tan 9"x9" Floor Tile with Black Mastic	Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
BM-08 <small>151909111-0028</small>	Brick Mortar at Red Brick (Exterior)	Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected



# EMSL Analytical, Inc.

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Tel/Fax: (713) 686-3635 / (713) 686-3645

<http://www.EMSL.com> / [houstonlab@emsl.com](mailto:houstonlab@emsl.com)

EMSL Order: 151909111

Customer ID: HARB78

Customer PO:

Project ID:

Analyst(s)

Jesse Ash (9)

Jenny Drapela (22)

Michelle Leggett, Laboratory Manager  
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Houston, TX NVLAP Lab Code 102106-0, AZ 0925, CO AL-15355, LA 04126, TX 300159

Initial report from: 12/10/2019 13:42:50

**ATTACHMENT B**

**PHOTOGRAPHS**



**PHOTOGRAPH 1: *Roofing Material***

**Sample No.** R-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 2: *Roofing Material***

**Sample No.** R-02

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 3: *Brick Mortar***

**Sample No.** BM-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 4: *Window Glazing***

**Sample No.** WG-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 5: *Brick Mortar***

**Sample No.** BM-02

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 6: *Window Glazing***

**Sample No.** WG-02

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 7: *Skylight Material***

**Sample No.** SL-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 8: *Window Glazing***

**Sample No.** WG-03

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 9: *Brick Mortar***

**Sample No.** BM-03

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 10: *Translucent Panel***

**Sample No's.** TP-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 11: *Window Glazing***

**Sample No.'s.** WG-04    **Date:** December 3, 2019    **Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 12: *Flexible Duct Connector***

**Sample No.** FD-01    **Date:** December 3, 2019    **Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 13: *Tan 9" x 9" Floor Tile w/ Black Mastic***

**Sample No.** FT-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 14: *Batt Insulation Backing***

**Sample No.** BI-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 15: 12" x 12" Ceiling Tile**

**Sample No.** CT-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 16: Brick Mortar**

**Sample No.** BM-04

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 17: *Window Glazing***

**Sample No.** WG-05

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 18: *Skylight Material***

**Sample No.** SL-02

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 19: Skylight Mastic**

**Sample No.** M-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 20: Roofing Material**

**Sample No.** R-03

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 21: *Pipe Wrap Joint***

**Sample No.** PW-01

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 22: *Brick Mortar***

**Sample No.** BM-05

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 23: *Roofing Material***

**Sample No.** R-04

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 24: *Window Glazing at Glass Block Window***

**Sample No.** WG-06

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579

Photo Unavailable

**PHOTOGRAPH 25: *Brick Mortar***

**Sample No.** BM-06

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 26: *Brick Mortar at red brick - interior***

**Sample No.** BM-07

**Date:** December 3, 2019

**Photographer:** Adam Smith, Inspector 015579



**PHOTOGRAPH 27: 9" x 9" Tan Floor Tile w/ Yellow and Black Mastic**  
Sample No. FT-02      Date: December 3, 2019      Photographer: Adam Smith, Inspector 015579



**PHOTOGRAPH 28: Brick Mortar at red brick - exterior**  
Sample No. BM-08      Date: December 3, 2019      Photographer: Adam Smith, Inspector 015579

**ATTACHMENT C**

**INSPECTOR AND COMPANY CREDENTIALS**

# Arkansas Department of Environmental Quality

ADAM SMITH

*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 Regulation 21 and is hereby certified in the State of Arkansas in the discipline(s) of Asbestos*

Discipline	Issue Date	Effective Date	Expiration Date
Inspector	08/08/2019	08/20/2019	08/31/2020



Certification Number: **015579**

*Becky W. Keogh*  
Becky W. Keogh  
ADEQ Director

# Arkansas Department of Environmental Quality

## MICHAEL A. DOLLAR

*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 Regulation 21 and is hereby certified in the State of Arkansas in the discipline(s) of Asbestos*

Discipline	Issue Date	Effective Date	Expiration Date
Inspector	02/27/2019	03/26/2019	02/29/2020



Certification Number: **017385**

*Becky W. Keogh*  
Becky W. Keogh  
ADEQ Director

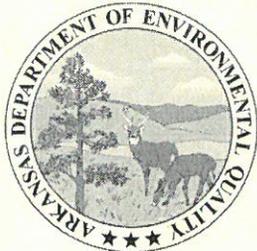
# Arkansas Department of Environmental Quality

## HARBOR ENVIRONMENTAL, INC.

is a licensed

### Asbestos Abatement Consultant

*having qualified as required by law in accordance with the regulations adopted by the Arkansas Pollution Control and Ecology Commission's Regulation 21 pursuant to Arkansas Code Annotated §20-27-1001 et seq., relative to abatement of asbestos-containing material within the state of Arkansas.*



License Number: 000477

Issue Date: 03/26/2018

Expire Date: 03/26/2019

A handwritten signature in blue ink that reads "Becky W. Keogh".

Becky W. Keogh  
ADEQ Director