UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
2890 WOODBRIDGE AVENUE
EDISON, NJ 08837

DATE: MAY 19 2016

SUBJECT: Removal Site Evaluation for the Beechnut Nutrition Site (CERCLIS #: NYD066809203), Canajoharie, Montgomery County, New York

FROM: Keith Glenn, On-Scene Coordinator
Removal Action Branch

TO: Joseph D. Rotola, Chief
Removal Action Branch

I. INTRODUCTION

The New York State Department of Environmental Protection (NYSDEC) requested the United States Environmental Protection Agency (EPA) to evaluate the Beechnut Nutrition Site (Site) for a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action. A Removal Site Evaluation (RSE) was requested by NYSDEC on December 1, 2015.

Samples collected as part of the RSE indicate a release of asbestos, a CERCLA designated hazardous substance, has occurred at the Site. Based on available information, a removal action is warranted to mitigate threats to public health or welfare or the environment associated with the release of a hazardous substance.

II. SITE CONDITIONS AND BACKGROUND

A. Site Description

The Site is located at 68-102 Church Street (42°54'23.95"N, 74°34'14.88"W) in the Village of Canajoharie, Montgomery County, New York. The Site is designated as one parcel of land (Tax ID: 63.14-1-9.1) that is bisected by the Canajoharie Creek. In total, the Site covers approximately 26.9 acres of land, most of which is developed. The western portion of the Site

consists of older interconnected structures originating from approximately 1891. These structures contain former offices, receptions, design studios, cafeterias, laboratories, canning and labeling process areas, bulk storage, retort facilities and boilers for heating the entire facility and parts of the Village. Most furniture and process equipment has been removed, however all boilers remain in the basement and lower lying areas of the facility. Several above ground passageways traverse the Canajoharie Creek, once used to move people, raw materials and finished product. Structures located to the east of the Canajoharie Creek are newer in construction. These large warehouses once held equipment used for packaging, shipping and distribution of finished products. Most of the process equipment from these warehouses has been removed, leaving vast empty spaces. Recent property owners have been demolishing warehouses located on the eastern portion of the Site. These activities have removed approximately 3 structures, while leaving behind piles of roofing material in addition to cinderblocks originating from former walls and foundations.

Many of the buildings located on-site are interconnected. The buildings are mostly constructed with masonry block and concrete. In the western portion of the Site structures vary in height from two stories to five stories. In addition, subterranean basements and passageways carry piping and equipment throughout the complex and into the Village of Canajoharie. A tall smokestack, once an iconic symbol of the Beechnut facility, has partially collapsed. The structures located on the eastern portion of the Site are one story warehouses and are homogenous in construction with masonry block walls and steel supports.

The Site is an abandoned facility located in a mixed-use area of Canajoharie. The Site is bounded to the north by the New York State Thruway, beyond which is a water treatment plant, public park and the Mohawk River. To the east is the entrance/exit to the New York State Thruway along with a gas station and convenience store. The southern boundary is marked by Main Street where several businesses and a recreational trail are located across from the Beechnut Nutrition facility. The Site is bounded to the west by Church Street, the main thoroughfare of Downtown Canajoharie. Numerous restaurants, shops and businesses are located along Church Street adjacent to the facility. The Site is bisected by the Canajoharie Creek which leads to the Mohawk River, located north of the New York State Thruway. The nearest residential properties are located along Front Street, approximately 150 feet south of the Site's southern boundary.

2. Site History

The Site dates back to the 1890s when the Imperial Packing Co. was smoking and selling ham and bacon. Beech-Nut Packing Company was incorporated in the late 1890s and patented the first vacuum jar. With the success of canning operations, the company expanded the product line to include jam, peanut butter, candy, coffee, sauces, chewing gun, baby food and many other products. As additional products were introduced, the facility continued to expand its operational footprint by constructing additional structures on the property. In the mid-2000s Beech-Nut announced intensions to move operations elsewhere. The Town of Florida, NY offered special tax incentives, and all manufacturing, packaging, distribution and corporate entities were relocated.

The Site was sold to TD Development, LLC in December 2013, who then sold it to TD Development, Inc. approximately 1 year later.

In spring 2014 demolition activities commenced on the eastern portion of the Site. Starting with Building #74, contents of value were removed and asbestos abatements were performed by third party contractors to the property owner. Demolition activities continued with Building #73 in spring 2015 followed by Building #72 in fall 2015.

3. Previous Work Relevant to this Removal Site Evaluation

Numerous asbestos abatement, scrapping and recycling contractors were employed by previous and current property owners. A report dated May 18, 2014 generated by Asbestos & Environmental Consulting Corporation indicates that 18 samples were collected in Buildings 73 and 74 and analyzed for asbestos content. Samples were collected of roofing components including caulk, cement and flashing material. Asbestos was detected in 6 samples. Samples were found to contain between <0.25 and 22.2% chrysotile asbestos. Asbestos was detected in all media except built-up roofing material, a construction technique typically containing asphalt.

A report generated on February 6, 2015by Spectrum Environmental Associates indicates 5 samples were collected from Building #73, not previously identified in the May 2014 report. Samples were collected from exterior surfacing on the building foundation and paint within an interior bathroom. Sample results indicated trace amounts, <0.25 %, of chrysotile asbestos was present in the exterior surfacing material. Asbestos was not detected in the paint located in the bathroom.

Additional reports were generated of other buildings located on the east side of the Site, which indicated the presence of asbestos-containing material (ACM) in pipe wrap, ceiling tiles, floor tiles, pipe elbows and window glaze. An extensive pre-demolition survey was completed by Ambient Environmental, Inc. on January 11, 2012 of the structures located to the west of the Canajoharie Creek. This report highlighted asbestos found in ceiling tiles, vapor barrier mastic, joint compound, paint, wall coating, window glazing, mortar, insulation and other various materials.

No previous work relevant to this RSE has been performed by other government officials. Village officials, including the Police Department, Fire Department, Department of Public Works, Code Enforcement and the Mayor's Office have visited and surveyed the Site numerous times. The New York State Department of Labor has maintained an active role in overseeing asbestos abatement and removal activities, when applicable.

B. <u>Site Assessment Activities/Observations</u>

On December 15, 2015 EPA visited the Site and performed an exterior survey from the surrounding streets. Although several windows were noticed to be broken or missing, the structures appeared to be structurally sound. All of the buildings had intact roofing and exterior walls. Although the structures located on the west side of the Site are showing age, none of the structures were observed to be collapsed or in threat of falling.

The remnants of demolition activities were observed in the eastern section of the Site, located near the entrance to the New York State Thruway. Numerous piles of debris were found to be staged along former building foundations and walls. Piles appeared to segregate roofing material, metal and masonry blocks.

On February 23, 2016 EPA and Removal Support Team ("RST") contract personnel met with Village officials at the Site. An interior survey commenced with areas on the western portion of the Site where administrative offices, laboratories, engineering systems and production facilities are located. Interior rooms were in various states of deterioration due to broken windows and broken water lines. Pipes, used to migrate rain water from the roof to sanitary lines located in the basement and underground passages, burst inside the buildings providing a pathway for water to migrate inside the structures. Significant growth of black mold was observed in nearly all office areas, in addition to vegetation growing in a conference room located on the second floor. Water intrusion along stairways have created cascading ice sculptures due to the cold temperatures. However, the interior offices and most other spaces were observed to be void of clutter, furniture and equipment. The boiler rooms, as the exception, were found to contain massive heating units of various age. Asbestos-containing material previously sampled and discussed in the January 2012 pre-demolition survey was observed, including transite ceiling tiles, tank coatings, insulation, mastic, counter tops and wall coating. It was observed that much of this material was in a friable state.

The eastern portion of the Site consists of large, open warehouse structures that are interconnected. Many are void of contents as auction signs and brochures suggest equipment was previously sold. Most of the electrical and cable lines have been removed, suggesting they were taken for their value. An asbestos abatement project was observed to have been started in Building #45, Warehouse #4 and left unfinished. Red asbestos caution tape was located around the work area, where piping was observed to be partially removed from the ceiling. Sections of the pipe were wrapped or bagged and placed nearby, indicating workers left in a hurry. In addition, 5 roll-off containers were observed in a loading area located between Building #45 and Building #57. The roll-off containers appeared to be properly covered. An inspection of the contents found the items to be suspect asbestos-containing material (SACM), which were wrapped in plastic. No placarding, warning signs or labels were available on the exterior of the containers.

Further inspection of the eastern portion of the Site included the exterior location where previous demolition activities took place. Partial walls of former buildings were observed to be free standing while numerous piles of segregated roofing material, metal and masonry block were observed. Approximately 16 piles were observed; 1 of scrap metal, 4 of roofing material, 10 of masonry blocks coated with white paint-like substance, and 1 of roofing materials mixed with masonry block. All piles were exposed to the elements without protection from wind.

Perimeter fencing was found to be mostly intact surrounding the facility. However, several areas located along the eastern boundary of the Site were found to have fencing cut and removed, providing access to the exterior piles, the warehouses and passageways to the western structures. Doors in the loading areas located along Main Street were found to be unlocked and easily

accessible as fencing does not restrict these locations. Many exterior doors in the eastern and western sections of the Site were found to be unlocked or partially open. Gates located along Church Street were found to be void of locks.

On February 24, 2016 EPA and RST collected samples within the western and eastern portions of the Site, including materials located in the exterior piles. A total of 14 samples were collected throughout the Site; 2 western interior, 2 eastern interior, and 10 eastern exterior. The 2 locations in the western section of the facility were from a ceiling tile in the administrative offices and pipe wrap located near the retort area. The 2 interior eastern sample locations were of the material located inside one of the roll-off containers and the pipe wrap associated with the partial asbestos abatement project in Building #45, Warehouse #4. The 10 exterior samples were collected from the piles located in the eastern section of the Site. Of these, 9 were from roofing materials and 1 was from the pile of masonry blocks. All samples were analyzed for asbestos.

Results indicated a total of 4 samples positive for containing asbestos. Sample BULK06, located in an exterior pile, was found to contain chrysotile asbestos at 1.32%. This location was the sole sample collected of masonry block, which was coated with a white paint-like material. Sample BULK11, pipe insulation associated with the abandoned abatement area in Building #45, was found to contain 18.8% amosite and 6.25% chrysotile asbestos. Sample BULK12 was material collected from inside the roll-off containers suspected of holding ACM. Results indicated that this material was found to contain 36.4% chrysotile asbestos. The pipe wrap collected from the retort area, BULK14, was found to contain 3.92% chrysotile asbestos.

To assess the masonry block material further, EPA and RST revisited the Site on March 10, 2016 and collected additional samples. A total of 16 samples were collected from the masonry block piles and exterior walls. Of these, 12 samples were collected from the piles of cinderblocks and included the coating, mortar and masonry block. One sample was collected from a partially standing wall associated with former Building #72. Three other samples were collected from the northernmost exterior walls. All samples were analyzed for asbestos.

The laboratory separated each sample and analyzed the coating material independent of the mortar/cinderblock. All coating samples were found to contain asbestos. The white coating associated with the masonry blocks and exterior walls was found to contain between 1.18 and 2.48% chrysotile. Asbestos was additionally found in the mortar or wall material of sample location BULK30. The laboratory noted all asbestos-containing material was in friable condition. Asbestos was not detected in any other sample of mortar or masonry block analyzed. Analytical data tables and sample location maps are located in Attachment A.

C. <u>Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant</u>

Sampling and analysis conducted at the Site has identified the presence of asbestos, a CERCLA hazardous substance as defined in Section 101 (14) of CERCLA, 42 U.S.C. § 9601(14), and is a listed hazardous substance in 40 CRF Table 302.4 of the National Oil and Hazardous Substances

Pollution Contingency Plan ("NCP"). The Site is a facility within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), and the presence of asbestos in friable form in exterior piles and walls at the Site constitute a "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

Substances Identified	Maximum Concentration	Statutory Source for a Hazardous Substance
Asbestos	36.4% Chrysotile	307(a) CWA, 112 CAA
Asbestos	18.8% Amosite	307(a) CWA, 112 CAA

Asbestos is designated as a CERCLA hazardous substance under 40 CFR Table 302.4 when friable. Friability is the ease with which a material can be crumbled, pulverized or reduced to powder when dry, by applying hand pressure. The degree of friability of the ACM determines the potential for fibers to be released into the air. Sampling and analysis conducted at the Site has identified chrysotile asbestos to be present at concentrations ranging from <1% to 36.4% and amosite asbestos at 18.8%.

III. THREAT TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

Asbestos is a hazardous substance as defined by Section 101(14), of CERCLA, 42 U.S.C. § 9601(14), and is listed in Table 302.4 of the NCP.

Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high concentrations of asbestos fibers over a long period of time may result in scar-like tissue developing in the lungs and in the lining of the pleural cavity that surrounds the lungs. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not the general public. People with asbestosis have difficulty breathing, aggressive coughing and in severe cases, heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death.

Breathing lower levels of asbestos may result in changes to the pleural membrane by introducing blebs, or plaques. Pleural plaques can occur in those working with asbestos products and in people living near areas with elevated levels of asbestos in the environment. Effects on breathing due to the presence of pleural plaques alone are not usually serious, however prolonged exposure can lead to thickening of the pleural membrane, which may restrict breathing.

EPA has identified conditions at the Site that meet the requirements of Section 300.415(b) (2) of the NCP (§40 CFR 300.415), which indicate that a removal action is warranted. Site conditions that correspond to factors that provide a basis for a removal action under Section 300.415 (b) (2) of the NCP include:

(1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)];

There is an actual or potential exposure to human populations from a hazardous substance at the Beechnut Nutrition Site. Sample results indicate the presence of ACM at numerous locations throughout the facility. Although material located inside the structures do not present an exposure to human populations or the environment, the coating on the masonry blocks staged outside is ACM. These blocks were once walls and foundation that have now been demolished. The masonry blocks were pushed, pulled, broken and moved during the demolition activities in order to place them into piles. There is no evidence that these blocks were managed in an appropriate manner. Demolition activities have resulted in exposure and weathering of ACM. Exposed to the environment the coating material is degrading. Any disturbance of this material, such as moving, natural decay and wind events, may cause asbestos fibers to be released to the air. Exposure to asbestos found at the Site can occur through inhalation, once fibers become airborne.

(2) Weather conditions that may cause hazardous substances or pollutants to migrate or to be released [300.415(b)(2)(vi)];

Sample results indicate the presence of ACM throughout the exterior eastern section of the Site, which is subject to weathering. Masonry blocks coated with asbestos-containing material are exposed to drastic weather events, including hot summers and frigid winters. Exposure to these elements may cause the coating material to degrade, crack, flake and separate from the masonry block. Weathering causes the matrix which binds the fibers together to be broken down, releasing the fibers to the environment. Once in the environment, the stable mineral fibers persist and do not readily break down further. Wind traveling across the Site may cause asbestos fibers to be entrained in the air, increasing the likelihood of being carried downwind. In addition, rain and snow events may cause ACM to be transported to sewer systems, the Canajoharie Creek, the Mohawk River or areas adjacent to the Site.

(3) The availability of other appropriate federal or State response mechanisms to respond to the release [300.415(b)(2)(vii)];

EPA is the only government agency capable of taking a timely and appropriate action to respond to the threat posed by the presence of hazardous substances at the Site.

B. <u>Threats to the Environment</u>

At this time there is no documentation to indicate that the Site is currently having an acute impact to any sensitive environments or natural resources.

IV. CONCLUSIONS

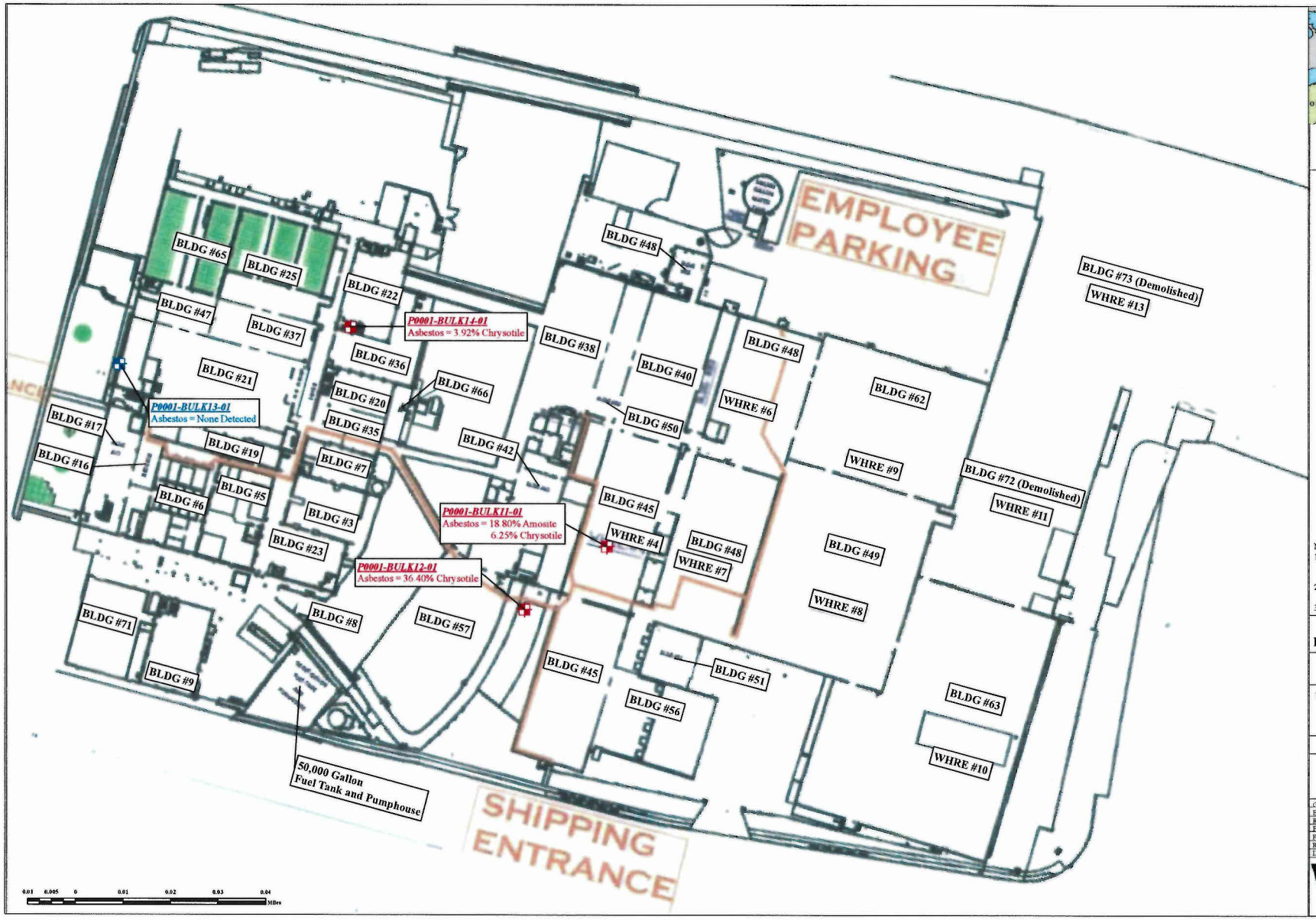
The Site is considered a facility as defined by Section 300.5 of the NCP and Section 101(9) of CERCLA, 42 U.S.C. § 9601(9). A release of a hazardous substance has occurred at the Beechnut Nutrition Site. Friable asbestos-containing material has been identified in exterior locations within the eastern portion of the Site. An exposure pathway exists that may present a threat to the public health and welfare. A CERCLA removal action is warranted to mitigate the threat to public health or welfare or environment associated with the release of hazardous substances at the Site.

cc: Eric Wilson, EPA

REMOVAL SITE EVALUATION FOR THE
BEECHNUT NUTRITION SITE
CANAJOHARIE, NY
SITE ID# A26B

ATTACHMENT A

Sample Maps and Data Summary Tables



SCALE

1:1,200

LEGEND

Bulk PACM Sample Location

No PACM Detected

PACM Detected

Notes:
1.) Floorplan was provided by the EPA OSC which was georeferenced for the purposes of the creation of this map.
2.) Bulk PACM samples collected in February and March 2016.
3.) All results presented in percent (%).

Figure 3: Interior Bulk PACM Analytical Results Map

Beechnut Nutrition Site
Canajoharie, New York

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM 3
CONTRACT # EP-S2-14-01

Weston Solutions, Inc.

In Association With Scientific and Environmental Associates, Inc., Environmental Compliance Consultants, Inc., Avatar Environmental, LLC, On-Site Environmental, Inc., and Sovereign Consulting, Inc

GIS ANALYST	T. BENTON
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RST 3 SPM	J. BUNDENS
FILENAME	160316_InteriorAnalyticalMap.mxd
FIGURE	3
REVISION	0
DATE MODIFIED	3/17/2016

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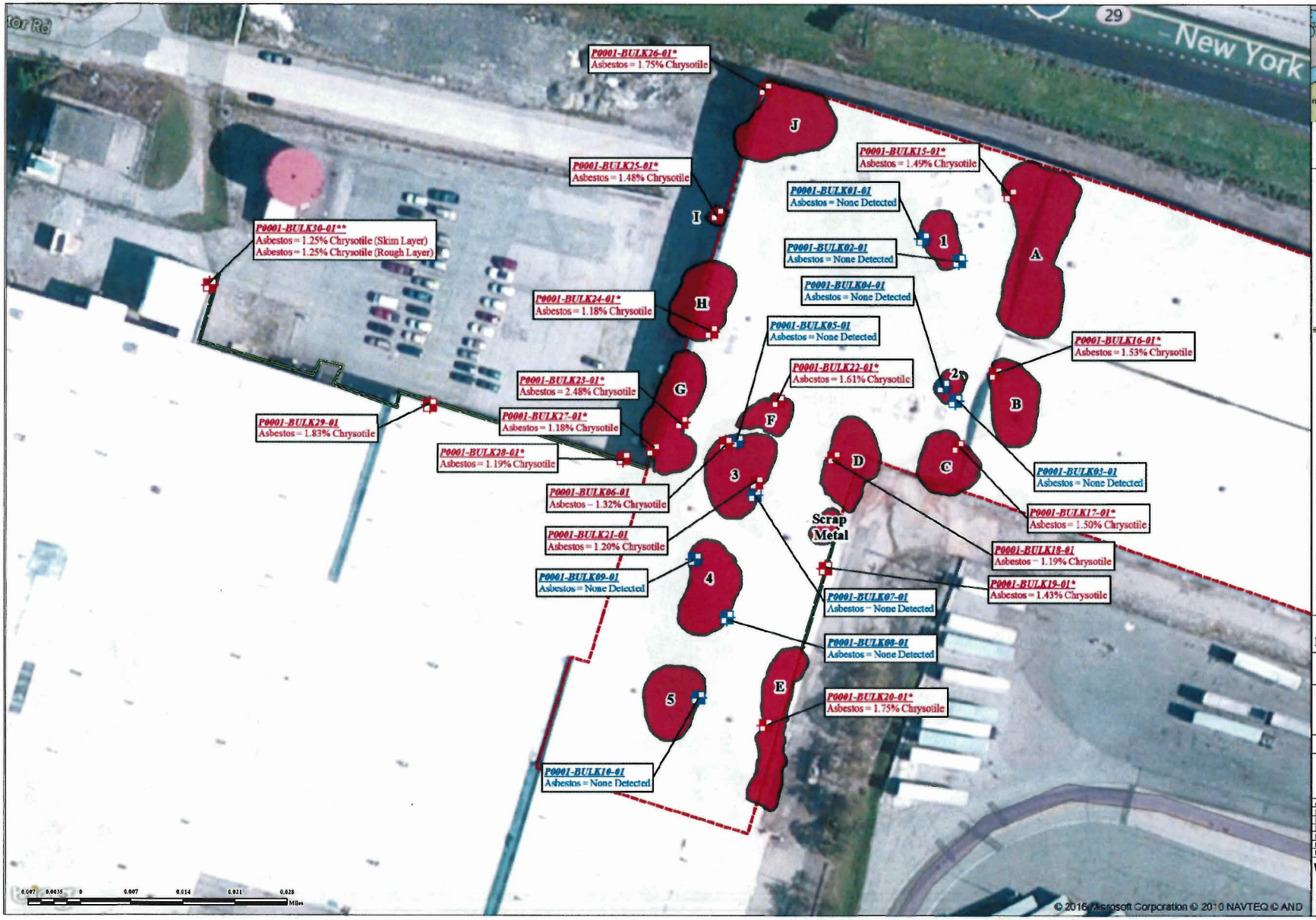

SCALE

1:770

LEGEND

Bulk PACM Sample Location

- No PACM Detected
- PACM Detected
- On-Site Waste Pile
- Demolished Section of Building
- Existing Wall

Notes.
1.) Bulk PACM samples collected in February and March 2016.
2.) "*" Represents a bulk PACM sample which contained two layers with the skim layer containing asbestos and the rough layer being non-detect for asbestos. Skim layer values are provided in the call out boxes.
3.) "**" Represents a bulk PACM sample which contained two layers (skim and rough) with asbestos present in each layer.
4.) All results presented in percent (%).
5.) Waste pile nomenclature developed by the EPA OSC.

Figure 4: Exterior Bulk PACM Analytical Results Map

Beechnut Nutrition Site
Canajoharie, New York

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GIS ANALYST:	T. BENTON
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RST 3 SPM:	J. BUNDENS
FILENAME:	160316_ExteriorAnalyticalMap.mxd
FIGURE:	4
REVISION:	0
DATE MODIFIED:	3/17/2016

SCALE

1:770

LEGEND

On-Site Waste Pile

Demolished Section of Building

Existing Wall

Notes:
1.) Waste pile nomenclature developed by the EPA OSC.
2.) Total linear feet of wall = 516 ft.
3.) Total area of waste piles = 27,484 ft2.

Figure 5: Source Area Map

Beechnut Nutrition Site
Canajoharie, New York

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GIS ANALYST:	T. BENTON
EPA OSC	K. GLENN
RST 3 SPM:	J. HUNDINS
FILENAME:	160916_SourceAreaMap.mxd
FIGURE	5
REVISION	0
DATE MODIFIED	3/17/2016

WESTON SOLUTIONS

Table 1: Bulk Sample Collection Information and Preliminary Results Summary
Beechnut Nutrition Site - Removal Assessment
Feburary 24, 2016 and March 10, 2016

RST Sample No.	Longitude	Latitude	Date	Time Collected	Result (%)	ACM Type	Location Description	Material Description
P0001-BULK01-01	42.90732465	-74.56696143	2/24/2016	8:56	ND		Pile 1	Fabric
P0001-BULK02-01	42.90728206	-74.56686658	2/24/2016	9:03	ND		Pile 1	Roof tile (surface layer)
P0001-BULK03-01	42.90701462	-74.56687674	2/24/2016	9:10	ND		Pile 2	Fiberboard
P0001-BULK04-01	42.90704211	-74.56690743	2/24/2016	9:15	ND		Pile 2	Roof tile (under layer)
P0001-BULK05-01	42.90693441	-74.56744651	2/24/2016	9:21	ND		Pile 3	Fabric
P0001-BULK06-01	42.90693003	-74.56747619	2/24/2016	9:25	**1.32 %**	Chrysotile	Pile 3	Inseparable paint/coating layer
P0001-BULK07-01	42.90683074	-74.56740029	2/24/2016	9:30	ND		Pile 3	Roof tile (under layer)
P0001-BULK08-01	42.90659599	-74.56747226	2/24/2016	9:38	ND		Pile 4	Fiberboard
P0001-BULK09-01	42.90670795	-74.56755688	2/24/2016	9:42	ND		Pile 4	Fiberboard
P0001-BULK10-01	42.90644114	-74.56754748	2/24/2016	9:48	ND		Pile 5	Roof tile (surface and under layer)
P0001-BULK11-01	42.906388	-74.569243	2/24/2016	10:30	**25.05 %**	18.80% Amosite 6.25% Chrysotile	Building #45	Pipe Insulation
P0001-BULK12-01	42.906199	-74.569579	2/24/2016	10:45	**36.4 %**	Chrysotile	South Loading Dock / Roll-off RT5153	Pipe Insulation
P0001-BULK13-01	42.906931	-74.571252	2/24/2016	11:15	ND		Building #21	Ceiling Tile
P0001-BULK14-01	42.907043	-74.570295	2/24/2016	11:35	**3.92 %**	Chrysotile	Building #22	Inseparable paint/coating layer
P0001-BULK15-01	42.90740654	-74.56673195	3/10/2016	13:10	**1.49 %**	Chrysotile	Pile A	Skim layer
					ND			Rough layer
P0001-BULK16-01	42.907066	-74.56676955	3/10/2016	13:35	**1.53 %**	Chrysotile	Pile B	Skim layer
					ND			Rough layer
P0001-BULK17-01	42.9069245	-74.56686715	3/10/2016	13:45	**1.5 %**	Chrysotile	Pile C	Skim layer
					ND			Rough layer
P0001-BULK18-01	42.90690329	-74.5671929	3/10/2016	14:00	**1.19 %**	Chrysotile	Pile D	Inseparable paint/coating layer
P0001-BULK19-01	42.9066909	-74.56721373	3/10/2016	14:05	**1.43 %**	Chrysotile	Wall A	Skim layer
					ND			Rough layer
P0001-BULK20-01	42.90638898	-74.56736838	3/10/2016	14:10	**1.75 %**	Chrysotile	Pile E	Skim layer
					ND			Grey rough Layer
					ND			Black rough layer
P0001-BULK21-01	42.90685484	-74.56739498	3/10/2016	14:20	**1.2 %**	Chrysotile	Pile 3	Inseparable paint/coating layer
P0001-BULK22-01	42.90701309	-74.56733797	3/10/2016	14:30	**1.61 %**	Chrysotile	Pile F	Skim layer
					ND			Rough layer
P0001-BULK23-01	42.9069715	-74.56759186	3/10/2016	14:40	**2.48 %**	Chrysotile	Pile G	Skim layer
					ND			Rough layer
P0001-BULK24-01	42.90714622	-74.56751503	3/10/2016	14:46	**1.18 %**	Chrysotile	Pile H	Skim layer
					ND			Rough layer
P0001-BULK25-01	42.9073695	-74.56749925	3/10/2016	15:00	**1.48 %**	Chrysotile	Pile I	Skim layer
					ND			Rough layer
P0001-BULK26-01	42.90760767	-74.56737421	3/10/2016	15:02	**1.75 %**	Chrysotile	Pile J	Skim layer
					ND			Rough layer
P0001-BULK27-01	42.90691807	-74.567667	3/10/2016	15:05	**1.18 %**	Chrysotile	Wall B	Skim layer
					ND			Rough layer
P0001-BULK28-01	42.9069011	-74.56774479	3/10/2016	15:10	**1.19 %**	Chrysotile	Wall C	Skim layer
					ND			Rough layer
P0001-BULK29-01	42.9070051	-74.56825602	3/10/2016	15:15	**1.83 %**	Chrysotile	Wall C	Heterogeneouse wall material
P0001-BULK30-01	42.90723289	-74.56883803	3/10/2016	15:20	**1.25 %**	Chrysotile	Wall D	Skim layer
					1.25 %			Rough layer

Notes:
ND = non-detect
ACM = asbestos-containing material
% = percent
Skim layer refers to the white coating material on the surface of the sample material.
Rough layer refers the under layer material of the same sample.