LIMITED ASBESTOS SURVEY REPORT

FRANK J. DOYLE SITE

905 N. POPLAR STREET
LEONARD, TEXAS 75452
MEC^X PROJECT NO.: 1303.009E.00

PREPARED FOR:
WESTON SOLUTIONS EPA START REGION 6
2600 DALLAS PARKWAY, SUITE 280
FRISCO, TEXAS 75034

PREPARED BY:

MATTHEW HAAK
ASBESTOS CONSULTANT
(TDSHS #10-5791)

9 October 2018

9975527

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1.0 INTRODUCTION

MEC^X, Inc. (MEC^X) performed a limited survey for asbestos-containing materials (ACMs) at 905 N. Poplar Street in the City of Leonard, Texas. Improvements to the Site began by the 1950s, with the current configuration from the 1970s. Improvements to the Site include a 2,190 square foot (SF) commercial warehouse building (Main Building) with gravel parking area. MEC^X performed the limited ACM survey for Weston Solutions (Weston) in support of the USEPA START contract in accordance with the terms of the agreement between MEC^X and Weston dated August 2017.

The purpose of the limited asbestos survey is to determine the presence, location, condition, and quantity of asbestos-containing materials (ACMs) located within the facility prior to the commencement of scheduled demolition.

MEC^X's representative Mr. Lee Ellmaker (TDSHS #98028), a Texas Department of State Health Services (TDSHS) licensed Asbestos Inspector, performed the survey on the 4 October 2018.

2.0 SAMPLING

A description of the asbestos survey conducted at the Site is presented in the sections below.

2.1 METHODOLOGY

The survey consisted of inspections of reasonably accessible building components to identify suspect ACM. MEC^X's representatives, a TDSHS licensed Asbestos Inspector/Consultant, collected samples of suspect ACM from the on-site buildings, in accordance with the Texas Asbestos Health Protection Rules, Texas Department of State Health Services, Asbestos Program, Texas Administrative Code, Title 25, Part 1, Chapter 295, Subchapter C - Texas Asbestos Health Protection, Texas Occupations Code, Chapter 1954 - Asbestos Health Protection, United States (U.S.) Environmental Protection Agency (EPA) Model Accreditation Plan specified in the Asbestos Hazard Emergency Reduction Act (AHERA). A detailed summary of MEC^X's sampling strategy is in Appendix A.

2.2 SAMPLE HANDLING AND ANALYSES

MEC^X placed the samples in polyethylene bags labeled with unique sample numbers and transported them for analysis (following chain-of-custody protocol) to Loflin Environmental Services, Inc. (Loflin), in Houston, Texas, a TDSHS licensed asbestos laboratory. Loflin is also participating member in the National Institute of Standards and Technology (NIST) administered by the National Voluntary Laboratory Accreditation Program (NVLAP). Loflin analyzed bulk samples for asbestos content by polarized light microscopy (PLM).

MEC^X collected 30 samples, inclusive of quality control duplicates, of suspect ACM were collected. A minimum of 3 samples for each homogeneous area (HA) were collected. These samples represented the HA described below.

Main Building

1. Corrugated Fibrous Panel, Yellow
2. Mastic, Yellow
3. Braided Wire, Gray
4. Window Glazing, Gray
5. Roof Sealant/Caulking, Black
6. Caulking on Roof Nails, White
7. Exterior Metal Panel Coating, Yellow
8. Exterior Metal Panel Coating, Peach
9. Self-Adhesive Flashing, Black/Silver
10. Roof Penetration Sealant, Black

MEC^X did not identify or sample additional suspect ACM during this survey.

3.0 RESULTS

3.1 REGULATORY FRAMEWORK

The U.S. EPA defines an asbestos-containing material (ACM) [1] as a material that contains one percent (%) or more asbestos using Polarized Light Microscopy (PLM). ACM is classified into one of the following three categories:

- Friable ACM: ACM when dry, can be crumbled, pulverized and/or reduced to powder by hand pressure.
- Category I Non-Friable ACM: packings, gaskets, resilient floor covering/mastics and/or asphalt roofing products that, when dry, cannot be crushed with hand pressure. Category I non-friable ACM must be inspected and tested for friability before demolition if it is in poor condition.
- Category II Non-Friable ACM: other materials (asbestos-cement (A/C), shingles, A/C tiles, and transite boards or panels) that, when dry, cannot be crushed with hand pressure.

3.1.1 Regulated Asbestos-Containing Material

According the EPA's National Emissions Standards for Hazardous Air Pollutants[2] (NESHAP) regulation for renovations and demolitions, ACM becomes regulated[3] asbestos-containing material (RACM) if the ACM is:

1. Friable;
2. Category I non-friable ACM that is in poor condition and become friable;
3. Category I or II non-friable ACM that will be or has been subjected to sanding, grinding, cutting and/or abrading; or
4. Category II non-friable ACM that has a high probability of becoming or has become crumbled, pulverized and/or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations. Further, Category II non-friable ACM (i.e., cement siding, transite board shingles, etc.) subjected to intense weather conditions such as thunderstorms, high winds and/or prolonged exposure to high heat and humidity may become "weathered" to a point where they become friable.

3.1.2 Abatement

According to NESHAP (40 CFR §61.145) and TDSHS *Texas Asbestos Health Protection Rules*[4] *(§*295.60), friable or potentially friable ACM that will be disturbed and/or has the potential to be disturbed during renovation must be removed.

---

[1] Title 40 Code of Federal Regulations (CFR) Part 61, Subpart M

[2] Ibid

[3] *Asbestos NESHAP Regulated Asbestos-Containing Materials Guidance EPA-340/1-90-018 (U.S. EPA*, December 1990) (http://yosemite.epa.gov/r5/r5ard.nsf/2f86cbca09880b61862565fe00588192/5d129f63c7fc077286256fc7006c542a!OpenDocument)

[4] Texas Administrative Code (TAC) Title 25, Part 1, Chapter 295, Subchapter C

A licensed asbestos consultant should be consulted prior to any renovation operations in a building or other structure containing ACM. In TDSHS regulated structures:

1. A TDSHS-licensed asbestos consultant shall design the asbestos abatement;
2. A TDSHS-licensed asbestos abatement contractor shall perform the abatement; and
3. A TDSHS-licensed company shall monitor the abatement.

3.2 ANALYTICAL RESULTS

The laboratory analyzed the bulk samples using PLM, according to protocol of the U.S. Environmental Protection Agency (USEPA Analytical Method EPA/600/R-93/116). The USEPA defines an asbestos-containing material (ACM) as any material that contains greater than one (1) percent asbestos by PLM analysis (NESHAP 40 CFR Part 61, Subpart M).

Using PLM, the laboratory analyzed samples in the above list. Samples of the following materials were found to contain greater than one percent (1%) asbestos as follows:

Main Building ACM:

- Roof Sealant/Caulking, Black (8-10%)

Material descriptions and locations are presented in Table I. Recommendations concerning the ACMs identified, if any, are based on condition, friability, and potential for disturbance.

Chain-of-custody documentation and laboratory reports for all bulk samples collected and analyzed are attached in Appendix B.

4.0 CONCLUSIONS AND RECOMMENDATIONS

MEC^X conclusions and recommendations concerning the identified ACM are based on condition, friability and potential for disturbance.

4.1 CONCLUSIONS

The following materials contain greater than 1% asbestos.

Main Building ACM:

- Roof Sealant/Caulking, Black (8-10%)

Other materials analyzed are not ACM.

4.2 RECOMMENDATIONS

The Occupational Safety and Health Administration (OSHA) addresses the removal of intact roof flashings and related incidental coatings and mastics in 29 CFR 1926.1101(g)(8)(ii). The removal roof flashings, mastics, and coatings, where the materials are not friable (intact) and will not be made friable by the specified work practices, can be completed by a trained roof contractor.

The removal of the flashings and coatings should adhere to the items specified below.

- If the total asbestos-containing roof area undergoing demolition/renovation is less than 160 ft^2, NESHAP does not apply, regardless of the removal method to be used, the type of material (Category I or II), or its condition (friable versus nonfriable). 40 CFR 61.145(a)(4). However, EPA would recommend the use of methods that damage asbestos-containing roofing material as little as possible.
- A competent person must inspect the worksite and determine that flashings/mastics are intact and will likely remain intact. A negative exposure assessment can be developed from monitoring data issued by the National Roofing Contractors Association titled, “Objective Data Demonstration for Certain Roofing Materials and Operations Under OSHA’s 1994 Asbestos Standard” or by directly collecting personal air samples.
- The flashings and coatings must not be sanded, abraded, or ground. Manual wet methods that do not render the material friable (non-intact) must be used. Examples of acceptable methods include those listed below.
    - Spud, spade, flat-blade or slicing tools
    - Axes
    - Mattlocks
    - Pry bars, spud bars, or crow bars
    - Shovels
    - Flat-blade knives and utility knives
    - Shears
- Flashings/coatings that have been removed must not be dropped or thrown to the ground. Unless the material is carried or passed to the ground by hand, it must be lowered to the ground via covered, dust-tight chute, crane, or hoist. Flashing/coatings must be removed from the roof as soon as practicable, but in any event no later than the end of the work shift.

- The disposal facility should be notified in advanced that the roofing material consists of non-regulated asbestos containing roofing materials.
- For emergency demolition/renovations (as defined in §61.141), where work must begin immediately to avoid safety or public health hazards, equipment damage, or unreasonable financial burden, the notification must be postmarked or delivered to EPA as soon as possible, but no later than the following work day.

If concealed (i.e., hidden or otherwise inaccessible during the survey) materials similar to those identified as ACM are observed during renovation and/or demolition, those materials should be considered asbestos containing until asbestos bulk sampling and analyses are performed. The following analytical results pertain to only the samples analyzed and may not reflect the actual composition of the entire homogeneous area. MEC^{X} assumes no responsibility for any subsequent use or interpretations of these analytical results.

5.0 LIMITATIONS

The scope of this project was limited to the locations/buildings/units described herein. The analytical results presented herein pertain only to the samples analyzed and may not reflect the actual composition of the entire HA. Although this asbestos survey was thorough in scope, it is important to identify those materials that were not encountered during the survey so that if they are encountered during renovation/demolition activities, these materials can be considered ACM until testing proves otherwise.

As a minimum, the materials that should be assumed to contain asbestos if encountered include:

- High temperature gaskets and packing materials;
- Concealed construction materials; and
- Electrical panel partitions/equipment.

If additional suspect materials not specifically identified within this report are encountered during renovation and/or demolition, those materials should be considered asbestos containing until asbestos bulk sampling and analyses are performed.

This report does not guarantee that additional ACM is not present.

MEC^X explicitly denies responsibility for any subsequent use or interpretations of these analytical results. This report must not be used to claim product endorsement by NVLAP or any other state or federal government agency.

TABLE 1
ASBESTOS SUMMARY TABLE

HOMOGENEOUS AREA (HA)	LAB SAMPLE NUMBERS	MATERIAL NAME	MATERIAL DESCRIPTION	MATERIAL LOCATION/APPROXIMATE AREA	CONDITION	FRIABLE	ASBESTOS CONTAINING
5	L294233	Roof Sealant	Black Tarry	Main Building Roof Peak/~50 LF (~33 SF)	Fair	No	8-10%
	L294234	Roof Sealant	Black Tarry	Main Building Roof Peak/~50 LF (~33 SF)	Fair	No	8-10%
	L294235	Roof Sealant	Black Tarry	Main Building Roof Peak/~50 LF (~33 SF)	Fair	No	8-10%

APPENDIX A

MEC^X'S AHERA SAMPLING STRATEGY

MEC^X ASBESTOS SURVEY SAMPLING STRATEGY

The following illustrates the sampling strategy employed by MEC^X:

(a) **Surfacing materials** - In a randomly distributed manner, an accredited asbestos inspector collected bulk samples of surfacing materials, representative of each homogeneous area (unless it was otherwise assumed to be a ACM) as follows:

1. Collect at least three bulk samples from each homogeneous area that is less than or equal to 1,000 square feet (sf).
2. Collect at least five bulk samples from each homogeneous area that is greater than 1,000 sf, but less than or equal to 5,000 sf.
3. Collect at least seven bulk samples from each homogeneous area that is greater than 5,000 sf.

(b) **Thermal systems insulation** - In a randomly distributed manner, an accredited asbestos inspector collected, at a minimum, three bulk samples of TSI material representative of each homogeneous area (unless it was otherwise assumed to be ACM) as follows:

1. An accredited asbestos inspector collected, at a minimum, one bulk sample of patched TSI, representative of each HA, unless it was assumed to be ACM, providing the section of patch was less than 6 linear feet or sf.
2. An accredited asbestos inspector collected, at a minimum, three representative bulk samples of each insulated mechanical system, unless it was assumed to be ACM, including, but not limited to cementitious material used on fittings such as tees, elbows and/or valves. Representative sampling was conducted in a manner sufficient as to identify whether each homogenous area was ACM.

(c) **Miscellaneous materials** - An accredited asbestos inspector collected, at a minimum, three representative bulk samples of each miscellaneous material not assumed to be ACM, including, but not limited to ceiling tiles, floor tiles, associated floor tile mastic, etc. Representative sampling was conducted in a manner sufficient as to identify whether each homogenous area as ACM.

(d) Bulk samples are not required to be collected from homogeneous areas where the accredited asbestos inspector has determined that the TSI is a non-suspect material (e.g., fiberglass, foam glass, rubber or other non-ACM).

MEC^X classified the asbestos-containing materials as being either in good, fair or poor condition. The following are the general definitions of each category:

- Good condition - material which is intact without noticeable damage;
- Fair condition - material with small/minor amounts of overall or localized damage (generally less than 10% of the entire area).
- Poor condition - material with relatively large amounts of damage (generally greater than 10% of the entire surface area).

APPENDIX B
LABORATORY REPORTS

Loflin Environmental Services, Inc. 2020 Montrose Blvd., Houston, Texas 77006
(713) 521-3300 Fax (713)523-0829

LOFLIN

NVLAP 10-2044
TDH Lab 30-0031

Report of Bulk Sample Analysis For Asbestos Identification

Polarized Light Microscopy (PLM)
EPA 600/R-93/116, July 1994

Client: MECx, INC.
Client Address: 8864 INTERCHANGE DRIVE, HOUSTON, TX 77054
Project No: 750-18-24
Project Name: FRANK J. DOYLE SITE; 1303.009E.00

Date Received: 10/05/2018
Date Analyzed: 10/11/2018

Lab Number	Field Number	Sample Description (Components)	Sample Location	Asbestos Detected	Additional Constituents
L294221	1	BEIGE, FIBROUS HOMOGENEOUS (PANEL)		NONE DETECTED	50% GLASS FIBERS OTHER
L294222	2	BEIGE, FIBROUS HOMOGENEOUS (PANEL)		NONE DETECTED	50% GLASS FIBERS OTHER
L294223	3	BEIGE, FIBROUS HOMOGENEOUS (PANEL)		NONE DETECTED	50% GLASS FIBERS OTHER
L294224	4	YELLOW, GUMMY HOMOGENEOUS (MASTIC)		NONE DETECTED	OTHER
L294225	5	YELLOW, GUMMY HOMOGENEOUS (MASTIC)		NONE DETECTED	OTHER
L294226	6	YELLOW, GUMMY HOMOGENEOUS (MASTIC)		NONE DETECTED	OTHER
L294227	7	GRAY, FIBROUS HOMOGENEOUS (WIRE)		NONE DETECTED	50% GLASS FIBERS OTHER
L294228	8	GRAY, FIBROUS HOMOGENEOUS (WIRE)		NONE DETECTED	50% GLASS FIBERS OTHER
L294229	9	GRAY, FIBROUS HOMOGENEOUS (WIRE)		NONE DETECTED	50% GLASS FIBERS OTHER

Laboratory Manager

*Asbestos-containing materials - The type and percentage of various fibrous components was determined by the microscopist in accordance with U.S. Environmental Protection Agency "Method For The Determination Of Asbestos In Bulk Samples" EPA/600/R-93/116, July 1993.
Departures from the test method: **None**
The above test report must not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.
Analysis results on this test report pertain only to those materials tested.
Disclaimers: Asbestos content is quantified using Calibrated Visual Estimate. PLM analysis has been known to be inaccurate for materials with low concentrations of asbestos. Negative PLM results cannot be guaranteed. LES recommends using TEM analysis for materials reported as <1% or none detected. This report may not be reproduced, except in full, without written approval by LES

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Project No: 750-18-24
Project Name: FRANK J. DOYLE SITE; 1303.009E.00

Date Received: 10/05/2018
Date Analyzed: 10/11/2018

Lab Number	Field Number	Sample Description (Components)	Sample Location	Asbestos Detected	Additional Constituents
L294230	10	GRAY, ELASTIC HOMOGENEOUS (WINDOW GLAZING)		NONE DETECTED	OTHER
L294231	11	GRAY, ELASTIC HOMOGENEOUS (WINDOW GLAZING)		NONE DETECTED	OTHER
L294232	12	GRAY, ELASTIC HOMOGENEOUS (WINDOW GLAZING)		NONE DETECTED	OTHER
L294233*	13	BLACK, TARRY HOMOGENEOUS (ROOF SEALANT)		8-10% CHRYSOTILE	TAR
L294234*	14	BLACK, TARRY HOMOGENEOUS (ROOF SEALANT)		8-10% CHRYSOTILE	TAR
L294235*	15	BLACK, TARRY HOMOGENEOUS (ROOF SEALANT)		8-10% CHRYSOTILE	TAR
L294236	16	WHITE, GUMMY HOMOGENEOUS (ROOF CAULKING)		NONE DETECTED	OTHER
L294237	17	WHITE, GUMMY HOMOGENEOUS (ROOF CAULKING)		NONE DETECTED	OTHER
L294238	18	WHITE, GUMMY HOMOGENEOUS (ROOF CAULKING)		NONE DETECTED	OTHER

Laboratory Manager

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Project No: 750-18-24
Project Name: FRANK J. DOYLE SITE; 1303.009E.00

Date Received: 10/05/2018
Date Analyzed: 10/11/2018

Lab Number	Field Number	Sample Description (Components)	Sample Location	Asbestos Detected	Additional Constituents
L294239	19	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#1	NONE DETECTED	OTHER
L294240	20	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#1	NONE DETECTED	OTHER
L294241	21	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#1	NONE DETECTED	OTHER
L294242	22	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#2	NONE DETECTED	OTHER
L294243	23	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#2	NONE DETECTED	OTHER
L294244	24	BEIGE, CRUMBLY HOMOGENEOUS (EXT. PANEL COATING)	#2	NONE DETECTED	OTHER
L294245	25	BLACK, TARRY HOMOGENEOUS (FLASHING)		NONE DETECTED	TAR, CALCITE, OTHER
L294246	26	BLACK, TARRY HOMOGENEOUS (FLASHING)		NONE DETECTED	TAR, CALCITE, OTHER
L294247	27	BLACK, TARRY HOMOGENEOUS (FLASHING)		NONE DETECTED	TAR, CALCITE, OTHER

Laboratory Manager

*Asbestos-containing materials - The type and percentage of various fibrous components was determined by the microscopist in accordance with U.S. Environmental Protection Agency "Method For The Determination Of Asbestos In Bulk Samples" EPA/600/R-93/116, July 1993.
Departures from the test method: **None**
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Client Address: 8864 INTERCHANGE DRIVE, HOUSTON, TX 77054
Project No: 750-18-24
Project Name: FRANK J. DOYLE SITE; 1303.009E.00

Date Received: 10/05/2018
Date Analyzed: 10/11/2018

Lab Number	Field Number	Sample Description (Components)	Sample Location	Asbestos Detected	Additional Constituents
L294248	28	BLACK, TARRY HOMOGENEOUS (ROOF PEN. SEALANT)		TRACE% CHRYSOTILE	TAR, CALCITE, OTHER
L294249	29	BLACK, CRUMBLY HOMOGENEOUS (ROOF PEN. SEALANT)		NONE DETECTED	OTHER
L294250	30	BLACK, TARRY HOMOGENEOUS (ROOF PEN. SEALANT)		NONE DETECTED	5% CELLULOSE TAR, OTHER

Laboratory Manager

*Asbestos-containing materials - The type and percentage of various fibrous components was determined by the microscopist in accordance with U.S. Environmental Protection Agency "Method For The Determination Of Asbestos In Bulk Samples" EPA/600/R-93/116, July 1993.
Departures from the test method: **None**
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LOFLIN

Environmental Services, Inc.

2020 MONTROSE – HOUSTON, TX 77006

CLIENT: MEC[X]

CONTACT: Lee Ellmaker

ADDRESS: 8864 Interchange Drive

Houston, Texas 77054

PHONE/EMAIL: lee.ellmaker@mecx.net

LAB JOB: 750-18-24

JOB: Frank J. Doyle Site

DATE: 10/05/18

PO: 1303.009E.00

PLM ANALYSIS TURNAROUND

☐ Immediate (<2 Hours) ☐ Same Day ☒ 1 Day

☐ 2 Day ☐ 3 Day ☐ 5 Day

POINT COUNT (400 Point <.25%) TURNAROUND

☐ Immediate (<2 Hours) ☐ Same Day ☐ 1 Day

☐ 2 Day ☐ 3 Day ☐ 5 Day

LAB NUMBER	FIELD NUMBER	SAMPLE DESCRIPTION	LAB NUMBER	FIELD NUMBER	SAMPLE DESCRIPTION
294221	1	Corrugated Panel, yellow	294241	21	↓
22	2		42	22	Ext. Panel Coating #2, peach
23	3	↓	43	23	
24	4	Mastic, yellow	44	24	↓
25	5		45	25	Self Adhesive flashing, blk, silver
26	6	↓	46	26	
27	7	Braided Wire, gray	47	27	↓
28	8		48	28	Roof Penetration Sealant, black
29	9	↓	49	29	
30	10	Window Glazing, gray	50	30	↓
31	11				
32	12	↓			
33	13	Roof Sealant, black			
34	14				
35	15	↓			
36	16	Caulking on roof nails, white			
37	17				
38	18	↓			
39	19	Ext. Panel Coating #1, yellow			
40	20	↓			

CHAIN OF CUSTODY SIGNATURE

RELINQUISHED BY: Lee Ellmaker	RECEIVED BY: Kyd.
DATE/ TIME: 10/5/18 1040	DATE/ TIME: 10:42 10/05/18
RELINQUISHED BY:	RECEIVED BY:
DATE/ TIME:	DATE/ TIME:

APPENDIX C
FIGURES

LEGEND:

- APPROXIMATE PROPERTY BOUNDARY
- 1 - ASBESTOS SAMPLE LOCATION

NOTES:

AERIAL PHOTOGRAPH FROM GOOGLE EARTH PRO IMAGERY DATA

N

0 50 100 200 400

GRAPHICAL SCALE (FT)

TEXAS

MEC^X, INC.
8864 INTERCHANGE DRIVE
HOUSTON, TEXAS 77054

FIGURE 1 - ACM FIGURE

FRANK J. DOYLE SITE
905 N. POPLAR STREET
LEONARD, TEXAS 75452

PROJECT NO: 1303.009E.00 | REV. DATE: 10/9/2018 ELE

APPENDIX D
MEC^X'S CONSULTANT AGENCY LICENSE

TEXAS DEPARTMENT OF STATE HEALTH SERVICES

MECX INC

is certified to perform as a

Asbestos Consultant Agency

in the State of Texas within the purview of Texas Occupations Code, chapter 1954, so long as this license is not suspended or revoked and is renewed according to the rules adopted by the Texas Board of Health.

JOHN HELLERSTEDT, M.D.
COMMISSIONER OF HEALTH

License Number: 100505

Expiration Date: 10/9/2019

Control Number: 97032

(Void After Expiration Date)

VOID IF ALTERED NON-TRANSFERABLE