

NESHAP ASBESTOS DEMOLITION SURVEY
AND LEAD-BASED PAINT ASSESSMENT REPORT

St. Andrews Campground Reinvestment Project
Project #61109C
4607 State Park Lane
Panama City, Bay County, Florida


Prepared for:



Florida Department of Environmental Protection – Office of Operations
Bureau of Design and Construction MS 520
3800 Commonwealth Blvd
Tallahassee, Florida 32399

Issue Date: August 6, 2018

Susan M. McConnell
Asbestos Inspector


Signature

Mona P. Johnson, P.G., LAC
Licensed Asbestos Consultant
Florida License No. AX89


Signature

Prepared by:

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ECT Project No.: 150780-0100

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1. INTRODUCTION

Environmental Consulting & Technology, Inc. (ECT) has completed a U.S. Environmental Protection Agency (EPA) National Emissions Standards for Hazardous Air Pollutants (NESHAP) demolition survey of suspect asbestos-containing materials (ACMs) and a lead-based paint (LBP) assessment of the campground within the St. Andrews State Park, located at 4607 State Park Lane in Panama City, Bay County, Florida (Florida Department of Environmental Protection project [FDEP] #61109C). It is the understanding of ECT that the campground is scheduled for improvements in the near future.

On June 28, 2018, ECT personnel collected bulk samples of suspect ACM for laboratory analysis to determine asbestos content and type using polarized light microscopy (PLM). The entire campground was accessible at the time of the survey. Twenty-five (25) bulk samples of suspect ACM were collected for laboratory analysis. Asbestos was detected in the roofing mastic collected from bathhouse 1. No other asbestos was detected in the remaining building materials sampled.

In addition, on June 28, 2018, ECT personnel collected thirteen (13) paint chip samples for laboratory analysis of LBP. The Occupational Safety and Health Administration (OSHA) Construction Industry Lead Standard, Chapter 29 of the Code of Federal Regulations Part 1926.62 (29 CFR 1926.62), states if any lead is present in the sample it is defined as lead-containing (there is no minimum concentration). Lead was not detected above the laboratory method detection limit in the paint chip samples collected.

The following sections discuss the asbestos survey and LBP assessment purpose, procedures, methodology, conclusions, and recommendations.

2. ASBESTOS DEMOLITION SURVEY

2.1 SURVEY PURPOSE AND PROCEDURES

ECT conducted a NESHAP asbestos demolition survey of suspect ACM at the St. Andrews Campground (FDEP Project #61109C). The objective of the survey was to determine the condition and quantity of the suspect ACM that may be impacted by the planned demolition activities in order to comply with the EPA NESHAP requirements and the requirements of OSHA.

The survey was performed in general accordance with EPA NESHAP survey requirements and using the EPA Asbestos Hazard Emergency Response Act (AHERA) sampling protocols to determine the number of bulk samples collected and to comply with OSHA regulations governing asbestos related activities. Appendix A contains ECT personnel asbestos training certifications.

Ms. Susan M. McConnell, an EPA AHERA accredited asbestos inspector, conducted a walk-through of the structure on June 28, 2018, to identify homogeneous areas (materials similar in color and texture) of suspect ACM. The survey was then performed on typical suspect building materials to investigate and/or determine the location, quantity, type, condition, and potential for damage of suspect friable and non-friable ACM. EPA identifies friable materials as those which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. Consideration was also given to materials that could be reduced to powder by the forces (e.g., cutting and grinding) expected to act upon the suspect ACM during renovation activities.

ECT collected 25 bulk samples of suspect ACM from the campground. The samples were submitted for analysis to a National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory. A total of 31 samples, derived from the 25 bulk samples collected, were examined by the laboratory. Photographic documentation of each sample location was also obtained and is available upon request.

2.2 ASBESTOS SURVEY METHODOLOGY

The bulk samples of suspect ACM collected were analyzed by a laboratory accredited by NVLAP (NVLAP ID#101151-0) using PLM (EPA 600/R-93/116). This methodology identifies the quantity and type of asbestos, if any, in the sample being analyzed. Any material containing more than one percent asbestos is considered ACM according to EPA regulations (40 CFR 763) and OSHA 29 CFR 1926.1101 and 29 CFR 1910.1001.

2.3 ASBESTOS FACILITY DESCRIPTION

The St. Andrews Campground is at the pass between St. Andrew Bay and the Gulf of Mexico. The campground is 56-acres and consists of 178 campsites and four bathhouses. Bathhouses 1 and 2 were observed to be of similar construction and bathhouses 2 and 3 were observed to be of similar construction.

Suspect ACM sampled from the campground included caulk, HVAC pipe wrap, joint compound, insulation, textured ceiling, ceiling board, ceramic tile, concrete, asphalt, black asphalt shingles and black roofing sealant/mastic. The suspect ACMs appeared to be in good condition at the time of the survey.

Any other unidentified suspect ACM found within the structure during demolition activities, not specifically identified in this report, must be considered ACM until determined to be non-ACM by a licensed asbestos consultant and laboratory analysis.

2.4 ASBESTOS LABORATORY RESULTS

Asbestos was reported in the black roofing mastic located at bathhouse 1. Asbestos was not reported in any of the remaining samples collected. A copy of the certified laboratory analytical report and the corresponding chain of custody are provided in Appendix B. Table 1 is a summary of the asbestos survey and assessment results.

3. LEAD-BASED PAINT SURVEY

3.1 TESTING PURPOSE AND PROCEDURES

The OSHA Lead in Construction Standard (29 CFR 1926.62) regulation applies to all construction work where an employee may be occupationally exposed to lead. Construction work is defined as work for construction, alteration and/or repair, including painting and decorating. It includes, but is not limited to, demolition or salvage of structures where lead or materials containing lead are present; removal or encapsulation of materials containing lead; new construction, alteration, repair, or renovation of structures, substrates or portions thereof, that contain lead, or materials containing lead; installation of products containing lead; lead contamination/emergency cleanup; transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and maintenance operations associated with the construction activities described in this paragraph (OSHA, 1993). Based on the OSHA Construction Industry Lead Standard, 29 CFR 1926.62, if any lead is present in the sample it is defined as lead-containing (there is no minimum concentration).

The objective of testing was to identify LBP for environmental protection and safety of site workers and of the public pertaining to lead. During the assessment, the exteriors of the bathhouses were similar in color. A total of 13 paint chip samples were collected and submitted for laboratory analysis of LBP.

3.2 LEAD-BASED PAINT TESTING METHODOLOGY

The 13 paint chip samples were analyzed by a laboratory accredited by an Environmental Laboratory Accreditation Program (ELLAP) (ELLAP ID #163563) using EPA SW846 3050B*/7000B Method. The assessment was performed in general accordance with EPA and U.S. Department of Housing and Urban Development (HUD) guidelines for Hazard Identification and Abatement in Public and Indian Housing. An inspection of the structures was performed prior to the collection of samples to determine the number of

building components to be sampled. The number of samples collected depended upon the number of room equivalents of building component, substrate material (metal, wood, concrete, etc.), and observable paint color.

In accordance with HUD guidelines, lead is present in the painted surface with a measurement equal to or greater than 0.50 percent lead by weight, 5000 parts per million, or 1 milligram per square centimeter, or if the paint meets the definition of "poor" (greater than 2 ft² deterioration on interior components with large surface areas or greater than 10 percent of total surface area of small interior and exterior components or greater than 10 ft² on large exterior surfaces). EPA defines LBP as being defined in the Lead Exposure Reduction Act (October 29, 1992) as "paint or other surface coatings that contain lead in excess of 1 mg/cm² or 0.5 percent by weight". Since these buildings are not child occupied facilities, then the HUD guidelines do not apply.

The OSHA Construction Industry Lead Standard, 29 CFR 1926.62, states if any lead is present in the sample it is defined as lead-containing (there is no minimum concentration).

3.3 LEAD-BASED PAINT TESTING RESULTS

The laboratory analysis of the paint chips did not detect any lead above the laboratory method detection limit (MDL) in any of samples collected.

Table 2 is a summary of the lead testing identifications, locations, building components sampled, substrate materials, paint colors and conditions observed, and testing results for each sample during the investigation. Photographic documentation of each sample location was also obtained and is available upon request. The LBP laboratory analytical report is provided in Appendix C.

4. CONCLUSIONS AND RECOMMENDATIONS

4.1 CONCLUSIONS

ECT has completed the EPA NESHAP asbestos demolition survey and LBP assessment of the St. Andrews Campground located at the St. Andrews State Park in Panama City, Florida.

A total of 25 bulk samples of suspect ACM were collected and submitted for laboratory analysis of asbestos content using PLM methodology. Asbestos was observed in the black roofing mastic collected from bathhouse 1. No asbestos was detected in any of the remaining samples submitted for analysis.

In addition, 13 paint chip samples were collected and submitted for laboratory analysis of lead using EPA SW846 3050B*/7000B Method. Lead was not detected above the laboratory MDL in the paint chip samples collected.

4.2 RECOMMENDATIONS

It is the understanding of ECT that the St. Andrews Campground is slated for improvements in the near future. The black roofing mastic present on bathhouse 1 was identified as being ACM. This material is a Category I non-friable. ECT recommends removal of the ACM prior to demolition. The material should be kept wet during removal.

Note that OSHA work practices, training requirements, waste handling, and oversight requirements apply. An OSHA letter of interpretation regarding the demolition of buildings with ACM in place is included as Appendix E along with Asbestos/NESHAP Regulated Asbestos Containing Materials Guidance. The ACM construction debris should be properly handled and disposed in accordance with all federal, state, and local regulations. In addition to the considerations of the EPA regulations, OSHA regulates worker exposures to ACM and mandates worker training and work practices based upon the classification of the materials involved. General requirements covering permissible

exposure limits, multi-employer worksites, regulated areas, exposure assessments and monitoring, engineering controls, etc. also apply.

Should building materials be discovered during demolition activities other than those surveyed and sampled as described herein, then such materials should be assumed to be ACM until determined to be non-ACM by a licensed asbestos consultant and laboratory analysis in accordance with EPA NESHAP and OSHA regulations.

Please note that a 10-day notification is required to the local NESHAP regulatory agency prior to demolition and/or abatement activities.

5. LIMITATIONS

All of the professional opinions presented in this NESHAP Asbestos Demolition Survey and LBP Assessment Report are based solely on the scope of work conducted and sources referred to in this report. The data presented by ECT in this report were collected and analyzed using generally accepted industry methods and practices at the time the report was generated. This report represents the conditions, locations, and materials that were observed at the time the fieldwork was performed.

TABLES

TABLE 1: ASBESTOS SURVEY AND ASSESSMENT FORM

Project Name: St. Andrews Campground Reinvestment Project
 Survey Date: June 28, 2018

Consultant: ECT
 ECT Project No.: 180414-0100

Sample No.	Material	HA	Functional Space	Quantity	Condition	Damage Potential	Friable Y/N	Asbestos Type-%	EPA NESHAP Category
SAC- BH4-1	White caulk	1	Bathroom 4 - outside sink	-----	Good	High	No	NAO	
SAC- BH4-2	White caulk	1	Bathroom 4 - outside sink	-----	Good	High	No	NAO	
SAC- BH4-3	Gray caulk	2	Bathroom 4 - outside sink	-----	Good	High	No	NAO	
SAC- BH4-4	Gray caulk	2	Bathroom 4 - outside sink	-----	Good	High	No	NAO	
SAC- BH4-5	White joint compound	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-5	Pipe wrap	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-5	Pipe insulation	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-6	White joint compound	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-6	Pipe wrap	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-6	Pipe insulation	3	Bathroom 4 - mechanical room	-----	Good	High	No	NAO	
SAC- BH4-7	White caulk	4	Bathroom 4 - men's room	-----	Good	High	No	NAO	
SAC- BH4-8	White caulk	4	Bathroom 4 - men's room	-----	Good	High	No	NAO	
SAC- BH4-9	White texture ceiling	5	Bathroom 4 - men's room	-----	Good	High	No	NAO	
SAC- BH4-10	White texture ceiling	5	Bathroom 4 - women's room	-----	Good	High	No	NAO	
SAC- BH2-11	Ceiling board	6	Bathroom 4 - men's room	-----	Good	High	No	NAO	
SAC- BH2-12	Ceiling board	6	Bathroom 4 - women's room	-----	Good	High	No	NAO	
SAC- BH2-13	Concrete with white aggregate	7	Bathroom 2	-----	Good	High	No	NAO	
SAC- BH2-14	Concrete with white aggregate	7	Bathroom 2	-----	Good	High	No	NAO	
SAC- BH2-15	Concrete with black aggregate	8	Bathroom 2	-----	Good	High	No	NAO	
SAC- BH2-16	Concrete with black aggregate	8	Bathroom 2	-----	Good	High	No	NAO	
SAC- BH2-17	Black asphalt shingle	9	Bathroom 2 - roof	-----	Good	High	No	NAO	
SAC- BH2-17	Mastic for black asphalt shingle	9	Bathroom 2 - roof	-----	Good	High	No	NAO	
SAC- BH1-18	Black asphalt shingle	9	Bathroom 2 - roof	-----	Good	High	No	NAO	
SAC- BH1-19	4"x4" ceramic tile, cream	10	Bathroom 1 - women's room	-----	Good	High	No	NAO	
SAC- BH1-20	4"x4" ceramic tile, cream	10	Bathroom 1 - women's room	-----	Good	High	No	NAO	
SAC- BH1-21	Gray caulk	11	Bathroom 1 - women's room	-----	Good	High	No	NAO	
SAC- BH1-22	Gray caulk	11	Bathroom 1 - women's room	-----	Good	High	No	NAO	
SAC- BH1-23	Black asphalt shingle	9	Bathroom 1 - roof	-----	Good	High	No	NAO	

TABLE 1: ASBESTOS SURVEY AND ASSESSMENT FORM

Project Name: St. Andrews Campground Reinvestment Project
 Survey Date: June 28, 2018

Consultant: ECT
 ECT Project No.: 180414-0100

Sample No.	Material	HA	Functional Space	Quantity	Condition	Damage Potential	Friable Y/N	Asbestos Type-%	EPA NESHAP Category
SAC- BH1-23	Mastic for black asphalt shingle	9	Bathroom 1 - roof	-----	Good	High	No	8% Chrysotile	Cat I-Non Friable
SAC- 24	Black asphalt	12	Asphast driveway	-----	Good	High	No	NAO	
SAC- 25	Black asphalt	12	Asphast driveway	-----	Good	High	No	NAO	

Note: NAO = No Asbestos Observed. HA = Homogenous Area. LF = Linear Feet. SF = Square Feet.

TABLE 2. LEAD-BASED PAINT SURVEY AND ASSESSMENT FORM

Building Name: St. Andrews Campground Reinvestment Project
 Survey Date: June 28, 2018

Consultant: ECT
 ECT Project No.: 180414-0100

Sample No.	Material	Sample Location	Quantity	Paint Condition	Lead-Based Paint-%	Notes
SAC- BH4-L1	White paint with gray underneath	Bathhouse 4 Exterior Trim		Good	<0.024	
SAC- BH4-L2	White paint with gray underneath	Bathhouse 4 Exterior Trim		Good	<0.043	
SAC- BH4-L3	White paint with gray underneath	Bathhouse 3 Exterior Trim		Good	<0.018	
SAC- BH4-L4	Green Paint	Bathhouse 4 men's room		Good	<0.013	
SAC- BH4-L5	Green Paint	Bathhouse 4 men's room, walls		Good	<0.0092	
SAC- BH4-L6	White paint	Bathhouse 4 men's room, ceiling		Good	<0.0080	
SAC- BH4-L7	White paint	Bathhouse 4 men's room, ceiling		Good	<0.0080	
SAC- BH3-L8	Gray paint	Bathhouse 3, Exterior		Good	<0.018	
SAC- BH3-L9	Gray paint	Bathhouse 3 Exterior		Good	<0.0085	
SAC- BH3-L10	Yellow paint	Protective bollards		Good	<0.0080	
SAC- BH3-L11	Yellow paint	Protective bollards		Good	<0.0080	
SAC- 176-L12	Gray paint	Camping space 176		Good	<0.0080	
SAC- BH2-L13	Yellow paint	Bathhouse 1, mechanical room		Good	<0.0080	

Source: EMSL, 2018; ECT, 2018

APPENDIX A

**ENVIRONMENTAL CONSULTING &
TECHNOLOGY, INC. PERSONNEL CERTIFICATIONS**

RICK SCOTT, GOVERNOR

KEN LAWSON, SECRETARY

STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

LICENSE NUMBER	
AX89	

The ASBESTOS CONSULTANT
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2018

JOHNSON, MONA PHILLIPS
ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.
3701 NW 98TH STREET
GAINESVILLE FL 32606-5004



ISSUED: 09/12/2016

DISPLAY AS REQUIRED BY LAW

SEQ # L1609120002030



Northeast Florida Safety Council, Inc.

This certifies that

Susan McConnell

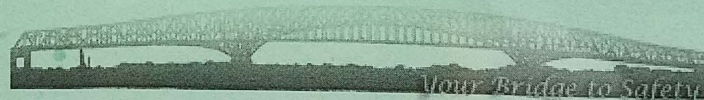
has successfully completed the
Asbestos Building Inspector Refresher - 4 Hour

Fred Alvarez

Instructor

Completion Date 4/4/2018

Expires 4/4/2019



Certificate valid only if imprinted with Program Watermarks

APPENDIX B

**ASBESTOS LABORATORY REPORT AND CHAIN OF
CUSTODY**



EMSL Analytical, Inc.

3303 PARKWAY CENTER COURT Orlando, FL 32808

Tel/Fax: (407) 599-5887 / (407) 599-9063

http://www.EMSL.com / orlandolab@emsl.com

EMSL Order: 341808917

Customer ID: ECT62

Customer PO:

Project ID:

Attention: Susan McConnell
Environmental Consulting & Technologies
4100 Center Pointe Drive
Suite 112
Fort Myers, FL 33916

Phone: (850) 383-0009

Fax: (239) 277-1211

Received Date: 07/02/2018 8:55 AM

Analysis Date: 07/12/2018 - 07/13/2018

Collected Date:

Project: 180414-0100

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
SAC-BH4-1 341808917-0001	Exterior Sink - White Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-2 341808917-0002	Exterior Sink - White Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-3 341808917-0003	Exterior Sink Area - Gray Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-4 341808917-0004	Exterior Sink Area - Gray Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-5-Mastic 341808917-0005	Mechanical Room - White Joint Compound	White Non-Fibrous Homogeneous	2% Synthetic	98% Non-fibrous (Other)	None Detected
SAC-BH4-5-Wrap 341808917-0005A	Mechanical Room - White Joint Compound PIPE WRAP	Tan Fibrous Homogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
SAC-BH4-5-Insulation 341808917-0005B	Mechanical Room - White Joint Compound INSULATION	Brown Fibrous Homogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
SAC-BH4-6-Mastic 341808917-0006	Mechanical Room - White Joint Compound OK	White Non-Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
SAC-BH4-6-Wrap 341808917-0006A	Mechanical Room - White Joint Compound PIPE WRAP	Silver Fibrous Heterogeneous	5% Cellulose 5% Glass	90% Non-fibrous (Other)	None Detected
SAC-BH4-6-Insulation 341808917-0006B	Mechanical Room - White Joint Compound PIPE INSULATION	Tan Fibrous Homogeneous	99% Min. Wool	1% Non-fibrous (Other)	None Detected
SAC-BH4-7 341808917-0007	Mens Bathroom - White Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-8 341808917-0008	Mens Bathroom - White Caulk	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-9 341808917-0009	Mens Bathroom - White Textured Ceiling	White Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-10 341808917-0010	Womens Cathroom - White Textured Ceiling	White Non-Fibrous Homogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-11 341808917-0011	Bathhouse 4 - Ceiling Board	Tan Fibrous Homogeneous	65% Cellulose	10% Ca Carbonate 25% Non-fibrous (Other)	None Detected
SAC-BH4-12 341808917-0012	Bathhouse 4 - Ceiling Board	Tan Fibrous Homogeneous	30% Cellulose	30% Ca Carbonate 40% Non-fibrous (Other)	None Detected

Initial report from: 07/13/2018 16:26:09



EMSL Analytical, Inc.

3303 PARKWAY CENTER COURT Orlando, FL 32808

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http://www.EMSL.com / orlandolab@emsl.com

EMSL Order: 341808917
Customer ID: ECT62
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
SAC-BH4-13 341808917-0013	Bathroom 2 Sidewalk - Concrete with White Aggregate	Gray/White Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-14 341808917-0014	Bathroom 2 Sidewalk - Concrete with White Aggregate	Gray/White Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-15 341808917-0015	Bathroom 2 Walls - Concrete Block with Black Aggregate	Gray Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-16 341808917-0016	Bathroom 2 Walls - Concrete Block with Black Aggregate	Gray Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-BH4-17-Shingle 341808917-0017	Roof of Bathroom 2 - Black Asphalt Shingle	Black Fibrous Homogeneous	10% Glass	90% Non-fibrous (Other)	None Detected
SAC-BH4-17-Tar 341808917-0017A	Roof of Bathroom 2 - Black Asphalt Shingle	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-18-Shingle 341808917-0018	Roof of Bathroom 2 - Black Asphalt Shingle	White/Black Fibrous Heterogeneous	10% Glass	90% Non-fibrous (Other)	None Detected
SAC-BH4-19 341808917-0019	Bathroom 1 Walls - 4"x4" Ceramic tile, Cream	Tan/White Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-20 341808917-0020	Bathroom 1 Walls - 4"x4" Ceramic tile, Cream	Tan/White Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-21 341808917-0021	Women's Room Sink Area - Gray Caulk	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-22 341808917-0022	Women's Room Sink Area - Gray Caulk	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
SAC-BH4-23-Shingle 341808917-0023	Roof of Bathroom 1 - Black Asphalt Shingle	Black Fibrous Homogeneous	12% Glass	88% Non-fibrous (Other)	None Detected
SAC-BH4-23-Mastic 341808917-0023A	Roof of Bathroom 1 - Black Asphalt Shingle	Black Non-Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
SAC-24 341808917-0024	Eastside Roadway - Black Asphalt	Gray Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected
SAC-25 341808917-0025	Westside Roadway - Black Asphalt	Black Non-Fibrous Heterogeneous		45% Quartz 15% Ca Carbonate 40% Non-fibrous (Other)	None Detected

Initial report from: 07/13/2018 16:26:09



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3303 PARKWAY CENTER COURT Orlando, FL 32808

Tel/Fax: (407) 599-5887 / (407) 599-9063

http://www.EMSL.com / orlandolab@emsl.com

EMSL Order: 341808917 Customer ID: ECT62 Customer PO: Project ID:
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Analyst(s)

Carlos Rivadeneyra (12)

Fletcher Etheridge (2)

Jhon Rosario (17)

Carlos Rivadeneyra, Laboratory Director
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. Orlando, FL NVLAP Lab Code 101151-0

Initial report from: 07/13/2018 16:26:09



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

341808917

PHONE:
FAX:

Company Name : ECT		EMSL Customer ID: ECT162	
Street: 2507 Callaway Road, Suite 102		City: Tallahassee	State/Province: FL
Zip/Postal Code: 32303	Country:	Telephone #: 850-383-0009	Fax #:
Report To (Name): Susan McConnell		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: smccconnell@ectinc.com		Purchase Order:	
Project Name/Number: 180414-0100		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: FL		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.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400</p> <p><input type="checkbox"/> w/ OSHA 8hr. TWA</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763</p> <p><input type="checkbox"/> NIOSH 7402</p> <p><input type="checkbox"/> EPA Level II</p> <p><input type="checkbox"/> ISO 10312</p>	<p>TEM- Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755</p> <p><input type="checkbox"/> Wipe - ASTM D6480</p> <p><input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p>
<p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%)</p> <p><input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY)</p> <p><input type="checkbox"/> NYS 198.6 NOB (non-friable-NY)</p> <p><input type="checkbox"/> NYS 198.8 SOF-V</p> <p><input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB</p> <p><input type="checkbox"/> NYS NOB 198.4 (non-friable-NY)</p> <p><input type="checkbox"/> Chatfield SOP</p> <p><input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100 2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p> <p>All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>Soil/Rock/Vermiculite</p> <p><input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<1%)</p> <p><input type="checkbox"/> PLM EPA 600/R-93/116 with milling prep (<0.25%)</p> <p><input type="checkbox"/> TEM EPA 600/R-93/116 with milling prep (<0.1%)</p> <p><input type="checkbox"/> TEM Qualitative via Filtration Prep</p> <p><input type="checkbox"/> TEM Qualitative via Drop Mount Prep</p> <p><input type="checkbox"/> Cincinnati Method EPA 600/R-04/004 - PLM/TEM (BC only)</p> <p>Other:</p> <p><input type="checkbox"/></p>

Check For Positive Stop - Clearly Identify Homogenous Group Filter Pore Size (Air Samples): 0.8µm 0.45µm

Samplers Name: Susan McConnell

Samplers Signature:

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled

Client Sample # (s): _____ Total # of Samples: 25

Relinquished (Client): Date: 6/28/18 Time: 09:12

Received (Lab): _____ Date: 7-2-18 Time: 8:55

Comments/Special Instructions:

SAMPLE No.	HOMOG. AREA	LOCATION	NOTES
SAC-BH4-1	1	Exterior sink	White caulk
SAC-BH4-2	1	Exterior sink	White caulk
SAC-BH4-3	2	Exterior sink area	Gray caulk
SAC-BH4-4	2	Exterior sink area	Gray caulk
SAC-BH4-5	3	Mechanical room	White joint compound <i>Mastic, Wrap, Insulation</i>
SAC-BH4-6	3	Mechanical room	White joint compound <i>Mastic, Wrap, Insulation</i>
SAC-BH4-7	4	Mens bathroom	White caulk
SAC-BH4-8	4	Mens bathroom	White caulk
SAC-BH4-9	5	Mens bathroom	White textured ceiling
SAC-BH4-10	5	Womens bathroom	White textured ceiling
SAC-BH4-11	6	Bathhouse 4	Ceiling board
SAC-BH4-12	6	Bathhouse 4	Ceiling board
SAC-BH4-13	7	Bathhouse 2 sidewalk	concrete with white aggregate
SAC-BH4-14	7	Bathhouse 2 sidewalk	concrete with white aggregate
SAC-BH4-15	8	Bathhouse 2 walls	Concrete block with black aggregate
SAC-BH4-16	8	Bathhouse 2 walls	Concrete block with black aggregate
SAC-BH4-17	9	Roof of Bathhouse 2	Black asphalt shingle
SAC-BH4-18	9	Roof of Bathhouse 2	Black asphalt shingle
SAC-BH4-19	10	Bathhouse 1 walls	4"x4" ceramic tile, cream
SAC-BH4-20	10	Bathhouse 1 walls	4"x4" ceramic tile, cream
SAC-BH4-21	11	Women's room sink area	Gray caulk
SAC-BH4-22	11	Women's room sink area	Gray caulk
SAC-BH4-23	9	Roof of Bathhouse 1	Black asphalt shingle
SAC-24	12	Eastside roadway	Black asphalt
SAC-25	12	Westside roadway	Black asphalt

*Please discontinue analysis of other samples within a homogenous area (HA) when one sample within the HA is tested positive.

APPENDIX C

**LEAD-BASED PAINT LABORATORY REPORT AND
CHAIN OF CUSTODY**



EMSL Analytical, Inc.

3303 PARKWAY CENTER COURT, Orlando, FL 32808

Phone/Fax: (407) 599-5887 / (407) 599-9063

<http://www.EMSL.com>

orlandolab@emsl.com

EMSL Order:	341808838
CustomerID:	ECTI62
CustomerPO:	
ProjectID:	


Attn: **Susan McConnell**
Environmental Consulting & Technology
2507 Callaway Road
Suite 102
Tallahassee, FL 32303

Phone: (850) 383-0009
Fax: (850) 383-0008
Received: 07/02/18 8:55 AM
Collected:

Project: 180414-0100

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

<i>Client Sample Description</i>	<i>Lab ID</i>	<i>Collected</i>	<i>Analyzed</i>	<i>Weight</i>	<i>Lead Concentration</i>
SAC-BH4-L1 Site: Bathhouse 4 Exterior Trim, White Paint With Gray Paint Underneath	341808838-0001		7/7/2018	0.0835 g	<0.024 % wt
SAC-BH4-L2 Site: Bathhouse 4 Exterior Trim, White Paint With Gray Paint Underneath	341808838-0002		7/7/2018	0.0468 g	<0.043 % wt
SAC-BH3-L3 Site: Bathhouse 3 Exterior Trim, White Paint With Gray Paint Underneath	341808838-0003		7/7/2018	0.1090 g	<0.018 % wt
SAC-BH4-L4 Site: Bathhouse 4 Men's Room, Green Paint	341808838-0004		7/7/2018	0.1567 g	<0.013 % wt
SAC-BH4-L5 Site: Bathhouse 4 Men's Room, Green Paint	341808838-0005		7/7/2018	0.2172 g	<0.0092 % wt
SAC-BH4-L6 Site: Bathhouse 4 Men's Room, White Textured Ceiling	341808838-0006		7/7/2018	0.2939 g	<0.0080 % wt
SAC-BH4-L7 Site: Bathhouse 4 Men's Room, White Textured Ceiling	341808838-0007		7/7/2018	0.3020 g	<0.0080 % wt
SAC-BH3-L8 Site: Bathhouse 3 Exterior Wall, Gray Paint	341808838-0008		7/7/2018	0.1099 g	<0.018 % wt
SAC-BH3-L9 Site: Bathhouse 3 Exterior Wall, Gray Paint	341808838-0009		7/7/2018	0.2344 g	<0.0085 % wt
SAC-BH3-L10 Site: Protective Bollards, Yellow Paint	341808838-0010		7/7/2018	0.2614 g	<0.0080 % wt
SAC-BH3-L11 Site: Protective Bollards, Yellow Paint	341808838-0011		7/7/2018	0.2593 g	<0.0080 % wt
SAC-176-L12 Site: Space 176 Water Line Cover, Gray Paint	341808838-0012		7/7/2018	0.2985 g	<0.0080 % wt
SAC-BH2-L13 Site: Mechanical Room Wall, Yellow Paint	341808838-0013		7/7/2018	0.286 g	<0.0080 % wt


Carlos Rivadeneyra, Laboratory Director
or other approved signatory

*Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.010 % wt based on the minimum sample weight per our SOP. Unless noted, results in this report are not blank corrected. 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. Samples received in good condition unless otherwise noted. "<" (less than) result signifies that the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. The QC data associated with the sample results included in this report meet the recovery and precision requirements unless specifically indicated otherwise. Definitions of modifications are available upon request.
Samples analyzed by EMSL Analytical, Inc. Orlando, FL AIHA-LAP, LLC--ELLAP Accredited #163563

Initial report from 07/12/2018 08:40:09



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Lead (Pb) Chain of Custody

EMSL Order ID (Lab Use Only):

PHONE: ()
FAX: ()

341808838

Company : ECT		EMSL-Bill to: <input checked="" type="checkbox"/> Same <input type="checkbox"/> Different If Bill to is Different note instructions in Comments**	
Street: 2507 Callaway Road, Ste 102		<i>Third Party Billing requires written authorization from third party</i>	
City: Tallahassee	State/Province: FL	Zip/Postal Code: 32303	Country:
Report To (Name): Susan McConnell		Telephone #: 850-383-0009	
Email Address: smcconnell@ectinc.com		Fax #: 850-383-0009	Purchase Order:
Project Name/Number: 180414-0100		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
U.S. State Samples Taken: FL		CT Samples: <input type="checkbox"/> Commercial/Taxable <input type="checkbox"/> Residential/Tax Exempt	

Turnaround Time (TAT) Options* - Please Check

<input type="checkbox"/> 3 Hour	<input type="checkbox"/> 6 Hour	<input type="checkbox"/> 24 Hour	<input type="checkbox"/> 48 Hour	<input type="checkbox"/> 72 Hour	<input type="checkbox"/> 96 Hour	<input type="checkbox"/> 1 Week	<input checked="" type="checkbox"/> 2 Week
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*Analysis completed in accordance with EMSL's Terms and Conditions located in the Price Guide

Matrix	Method	Instrument	Reporting Limit	Check
Chips <input checked="" type="checkbox"/> % by wt. <input type="checkbox"/> mg/cm ² <input type="checkbox"/> ppm (mg/kg)	SW846-7000B	Flame Atomic Absorption	0.01%	<input checked="" type="checkbox"/>
Air	NIOSH 7082	Flame Atomic Absorption	4 µg/filter	<input type="checkbox"/>
	NIOSH 7105	Graphite Furnace AA	0.03 µg/filter	<input type="checkbox"/>
	NIOSH 7300M/NIOSH 7303	ICP-OES	0.5 µg/filter	<input type="checkbox"/>
Wipe* ASTM <input type="checkbox"/> non ASTM <input type="checkbox"/> <small>*if no box checked, non-ASTM Wipe assumed</small>	SW846-7000B	Flame Atomic Absorption	10 µg/wipe	<input type="checkbox"/>
	SW846-6010B or C	ICP-OES	1.0 µg/wipe	<input type="checkbox"/>
TCLP	SW846-1311/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW846-1311/SW846-6010B or C	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
SPLP	SW846-1312/7000B/SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW846-1312/SW846-6010B or C	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
TTLC	22 CCR App. II, 7000B/7420	Flame Atomic Absorption	40 mg/kg (ppm)	<input type="checkbox"/>
	22 CCR App. II, SW846-6010B or C	ICP-OES	2 mg/kg (ppm)	<input type="checkbox"/>
STLC	22 CCR App. II, 7000B/7420	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	22 CCR App. II, SW846-6010B or C	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
Soil	SW846-7000B	Flame Atomic Absorption	40 mg/kg (ppm)	<input type="checkbox"/>
	SW846-6010B or C	ICP-OES	2 mg/kg (ppm)	<input type="checkbox"/>
Wastewater Unpreserved <input type="checkbox"/> Preserved with HNO₃ pH < 2 <input type="checkbox"/>	SM3111B/SW846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.7	ICP-OES	0.020 mg/L (ppm)	<input type="checkbox"/>
Drinking Water Unpreserved <input type="checkbox"/> Preserved with HNO₃ pH < 2 <input type="checkbox"/>	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.9	Graphite Furnace AA	0.003 mg/L (ppm)	<input type="checkbox"/>
	EPA 200.5	ICP-OES	0.003 mg/L (ppm)	<input type="checkbox"/>
TSP/SPM Filter	40 CFR Part 50	ICP-OES	12 µg/filter	<input type="checkbox"/>
	40 CFR Part 50	Graphite Furnace AA	3.6 µg/filter	<input type="checkbox"/>
Other:				<input type="checkbox"/>

Name of Sampler:		Signature of Sampler:		
Sample #	Location	Volume/Area	Date/Time Sampled	
Client Sample #s			Total # of Samples:	13
Relinquished (Client):		Date: 6/28/18	Time: 0912	
Received (Lab):		Date: 7-2-18	Time: 8:55am	
Comments:				

CHAIN OF CUSTODY

SAMPLE NUMBER	LOCATION	Pump Flow Rate (Lpm)	NOTES
SAC-BH4-L1	Bathhouse 4 exterior trim		White paint with gray paint underneath
SAC-BH4-L2	Bathhouse 4 exterior trim		White paint with gray paint underneath
SAC-BH3-L3	Bathhouse 3 exterior trim		White paint with gray paint underneath
SAC-BH4-L4	Bathhouse 4 men's room		Green paint
SAC-BH4-L5	Bathhouse 4 men's room		Green paint
SAC-BH4-L6	Bathhouse 4 men's room		White textured ceiling
SAC-BH4-L7	Bathhouse 4 men's room		White textured ceiling
SAC-BH3-L8	Bathhouse 3 exterior wall		Gray paint
SAC-BH3-L9	Bathhouse 3 exterior wall		Gray paint
SAC-BH3-L10	Protective bollards		Yellow paint
SAC-BH3-L11	Protective bollards		Yellow paint
SAC-176-L12	Space 176 water line cover		Gray paint
SAC-BH2-L13	Mechanical room wall		Yellow paint