Foothills Environmental, Inc.

Industrial Hygiene, Safety & Environmental Services

ASBESTOS INSPECTION REPORT

Project Location:
Delores Town Hall Building
420 Central Avenue
Dolores, Colorado 81323

Prepared for:

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ACRONYMS

ACM	Asbestos Containing Material
ACBM	Asbestos Containing Building Material
AIHA	American Industrial Hygiene Association
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
EPA	United States Environmental Protection Agency
OSHA	Occupational Safety and Health Administration
LBP	Lead Based Paint
LCP	Lead Containing Paint
NVLP	National Voluntary Laboratory Accreditation Program
PLM	Polarized Light Microscopy
PACM	Presumed Asbestos Containing Material
RACM	Regulated Asbestos Containing Material
RCRA	Resource Conservation and Recovery Act
SVF	Sheet Vinyl Flooring
TEM	Transmission Electron Microscopy
TSCA	Toxic Substances and Control Act
TSI	Thermal System Insulation
XRF	X-ray Fluorescence

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1.0 EXECUTIVE SUMMARY

On September 13th and 14th, 2023, Foothills Environmental, Inc. (FEI) performed an asbestos inspection of suspect building materials on the interior and exterior of the Delores Town Hall Building located at 420 Central Avenue in Dolores, Colorado. Mr. Jason Martin and Mr. Haden Wilde, Environmental Protection Agency (EPA) and Colorado Department of Public Health and Environment (CDPHE) certified asbestos inspectors conducted the inspection. Certifications are provided in Appendix D.

The buildings are office/meeting space structures that are scheduled for demolition. Random bulk samples were collected of suspect building materials as part of the asbestos inspection. The asbestos inspection was conducted in accordance to the guidelines published as the Environmental Protection Agency's Final Rule: Title II of the Toxic Substances Control Act (TSCA), 15 USC, Sections 2641 through 2654 or in compliance with 40 CFR, Part 763 and the Colorado Department of Public Health and Environment (CDPHE) Regulation #8.

The following materials were identified during the inspection:

- A total of one hundred and seventy one (171) asbestos samples were collected for this inspection.
- Sixteen (16) Asbestos-Containing Materials were identified, assumed, or confirmed in samples collected during this inspection.

5.3 Asbestos Materials Requiring Removal Prior to Renovation

Regulated Asbestos-Containing Material (RACM)
Regulated Asbestos-Containing Material (RACM) means (a) friable asbestos-containing 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 or (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.

Non-RACM
Non-RACMs are those non-friable materials not likely to be rendered friable during the normal demolition process, therefore are less likely to release airborne asbestos. Under normal demolition activities, non-RACMs that are non-friable Category I materials (gaskets, resilient flooring, adhesives, and asphalt roofing) and similar non-friable Category II are allowed by EPA and CDPHE regulations to remain during normal building demolition, and can be disposed of as normal demolition debris, provided these materials remain non-friable during demolition activities and the landfill will accept the waste as solid waste.

Table 1 – RACM

Homogeneous Area(s) / ACM Description	Condition	Type / Friable or Non-Friable	Analytical Result	Approx. Quantity	Material Locations
TAR1, Black roof tar	Damaged	Friable	11-12% Chrysotile	2 SF	Meeting Room section old roof, protruding from northwest corner of new metal roof
VFT3, Red/white 9”x9” floor tile and black mastic	Good	Friable	7% Chrysotile in floor tile Mastic was non-detect	127 SF	Both storage rooms and IT room
VFT4, Brown 9”x9” floor tile and black mastic	Good	Friable	12% Chrysotile in floor tile Mastic was non-detect	127 SF	Both storage rooms and IT room
LC1, Gray leveling compound and brown tile	Good	Friable	5-9% Chrysotile in brown tile Leveling compound was non-detect	1,400 SF	Under carpet in east side (office section) of building
VFT5, Tan 9”x9” floor tile and black mastic	Damaged	Friable	12% Chrysotile	872 SF	Janitor closet, office supply closet, manager’s office, treasurer’s office, clerk’s reception, clerk’s office, and vault
CMU1, White/tan CMU and block filler	Good	Friable	‘Trace’ – 2% Chrysotile	6,000 SF	All CMU walls east of builder officials office (meeting room section and office section)
TEX1, Heavy knockdown texture on drywall	Good	Friable	3-6% Chrysotile	1,880 SF	Main hallway, managers office, clerk’s office, treasures office, managers office
TEX5, Light orange peel pattern on drywall	Good	Friable	3% Chrysotile	396 SF	Janitor’s closet
TEX8, Sponge texture	Good	Friable	2% Chrysotile	252 SF	Break room chase
DT1, Duct Tape	Good	Friable	55-65% Chrysotile	3 SF	Former jail cell ceiling ducts
DWJC5, Drywall/Joint Compound Light knockdown texture with TEX8	Good	Friable	2% Chrysotile	-	North break room wall and north meeting room wall

Table 2 – NON-RACM

Homogeneous Area(s) / ACM Description	Condition	Type / Friable or Non-Friable	Analytical Result	Approx. Quantity	Material Locations
CLK1, Hard tan caulk	Damaged	Non-friable	32-37% Chrysotile	5 SF	All exterior windows and doors
CLK2, Soft tan caulk	Damaged	Non-friable	8% Chrysotile	3 SF	Southwest exterior windows
RRT1, Rolled asphaltic roof flashing with gray mastic and black tar	Good	Non-friable	4% Chrysotile in brown/gray paint	10 SF	Main entry and south roof

			6% Chrysotile in black tar		
PW1, Parapet wall core	Good	Non-friable	18% Chrysotile in black tar	100 SF	Office section original flat roof perimeter parapet walls
PW2, Parapet wall core white & tan	Good	Non-friable	15-20% in black fibrous tar	100 SF	Meeting Room section original flat roof perimeter parapet walls
TP1, Transite panel	Good	Non-friable	20% Chrysotile	141 SF	Clerk's Office, Meeting room, west storage room

TRACE MATERIALS (<1% ASBESTOS)

- None

5.4 Introduction

Foothills Environmental Inc. (FEI) was contracted by CDPHE to conduct an asbestos inspection on the interior/exterior of the mine mill located 420 Central Avenue in Dolores, Colorado. Mr. Jason Martin and Mr. Haden Wilde, EPA and CDPHE certified asbestos inspectors conducted the inspection on September 13th and 14th, 2023. Reservoirs Environmental Inc., an independent laboratory accredited by the National Voluntary Accreditation Program (NVLAP) and the American Industrial Hygiene Association (AIHA), analyzed the bulk samples for asbestos utilizing Polarized Light Microscopy (PLM).

5.5 Scope of Work

The combined goals of sampling and visual assessments were to:

1. Identify asbestos-containing material (ACM) from the interior and exterior of the building and document the location, condition, friability and quantity of each identified material.

2. Make appropriate recommendations on how to approach each material identified as an ACM prior to demolition or renovation.

3. Compile sample information, observations obtained from the site visit, conclusions and recommendations into a report.

5.6 Standard Bulk Sampling and Analytical Procedures

This asbestos inspection was completed in accordance with the Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation using bulk sampling techniques referenced in OSHA 29 CFR 1910.1001, which in turn, references U.S. EPA Asbestos Hazard

Emergency Response Act (AHERA) protocol, which is incorporated by reference in Colorado, Regulation No. 8.

The inspection was completed by separating materials into Homogeneous Areas. A homogeneous area (material) is defined as an area containing a material that appears similar throughout with regard to color, texture, and date of application. Individual systems that were inspected, but not suspected to contain asbestos, are not included in this report. Such systems include concrete, carpet, fiberglass, plastic, and wood products. From the list of suspect homogeneous areas, a physical assessment was performed for each material on the list. A physical assessment includes evaluating the condition, friability, and amount of damage of each material. By definition, "friable" materials are those that can be crumbled or reduced to powder by hand pressure when dry. Each material on the list was further classified into one of three categories, which have specific sampling requirements for each category.

Surfacing Materials: Refers to spray or troweled applied surfaces such as plaster ceilings and walls, fireproofing, textured paints, textured plasters, and spray-applied acoustical surfaces.

Thermal System Insulation: Refers to insulation used to inhibit heat gain or loss on pipes, boilers, tanks, ducts, and various other building components.

Miscellaneous Materials: Refers to friable and non-friable products and materials that do not fit in any of the above two (2) categories such as resilient floor covering, baseboards, mastics, adhesives, roofing material, caulking, glazing, and siding. This category also contains wallboard, joint compound, and ceiling tiles.

The condition of suspect materials was evaluated as “good”, “damaged”, or “significantly damaged” using the following parameters:

Good- material with no visible damage or deterioration or showing only very limited damage or deterioration.

Damaged- material which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that the bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Damaged material are those that are <10% scattered or <25% localized.

Significantly Damaged- material which has extensive and severe damage. Significantly damaged materials are those that are >10% scattered or > 25% localized.

Each suspect material was also classified as friable (F), Category I non-friable (Cat. I), or Category II non-friable (Cat. II), according to the U.S. EPA National Emissions Standard for Hazardous Air Pollutants (NESHAP) definitions.

The sampled materials were wetted with an amended water solution to minimize the release of airborne fibers during sample collection. A sample collection hand tool, cleaned after the collection of each sample, was used to remove a small sample of suspect material. Each suspect material was placed into a small plastic bag, labeled, and sealed. Upon completion of sampling activities, samples were placed into a sealed container along with chain of custody forms and delivered for analysis to Reservoirs Environmental Inc. (REI) in Denver, Colorado. REI is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for conducting bulk and air sample analyses for asbestos.

As specified in 40 CFR Part 763, Subpart F, Appendix A, each sample was analyzed using Polarized Light Microscopy (PLM) in accordance with U.S. EPA Method 600/R-93/116, June, 1993. Some samples will contain numerous "layers". The laboratory will classify and report each layer found with a corresponding asbestos content. In some instances, bulk samples of similar materials (HAs) are reported as having a different number of layers. Percent asbestos for separate layers and total for the sample are delineated in the laboratory report. Unused portions of samples are archived for six months unless the client requests special handling.

The Environmental Protection Agency (EPA) defines ACM as a material containing greater than 1.0 percent (%) asbestos. Both friable and non-friable materials were sampled. A friable material is a material that when dry may be crumbled, pulverized, or reduced to powder by hand pressure. Because friable materials are more easily damaged and more likely to release fibers into the air, they are of greater concern than non-friable ACM.

Materials containing 1% or less asbestos are considered Trace by EPA and CDPHE. The Occupational Safety and Health Administration (OSHA) Construction Asbestos Standard 29 CFR 1926.1101 contains work practice and engineering control requirements and prohibitions that must be observed regardless of the percentage of asbestos in installed construction materials. Even though these materials are not regulated under the NESHAP for demolition, consideration must be given for worker exposure during any activities that may disturb them.

5.7 Building Descriptions

The mine mill is located at 1 Goose Creek Road in Creede, Colorado. The original dates of construction were not known by the owner representative, but are assumed to be prior to 1900. The main mill is a wood framed structure with metal sheeting on the sides and roof. The boiler room and pump house appeared to be additions to the main mill, and were also constructed with wood framing along with metal siding on portions of the exterior walls and roof. One final addition, labeled as the west addition by FEI, was constructed of wood framing and metal roofing. Additional wooden support beams and metal sheeting on the roof have also been added within the past two decades in various areas where structural support was necessary

5.8 Statement of Inaccessibility

Accessible areas of the structure were inspected for ACM within the described scope of work. Underground conduit, roofing materials, electrical panels, instruments or other appurtenances were not inspected. Attempts were made to identify and access suspect materials; however, the potential for additional unidentified materials may exist within inaccessible areas, such as in machinery, in equipment, underground, etc. Due to the fragility and dilapidated state of many areas of the mill, FEI was unable to access a majority of the upper levels and was advised to stay on structurally supported pathways for safety purposes. Any suspect materials located in these areas should be assumed asbestos-containing until sample collection can be performed and subsequent analyses prove otherwise.

Conclusions of the report are professional opinions based solely upon site observations and interpretations of analyses as described in our report. The opinions presented herein apply to site conditions at the time of

our investigation, and interpretation of current regulations pertaining to regulated materials. Therefore, our opinions and recommendations may not apply to future conditions that may exist at the building, which we have not had the opportunity to evaluate. The regulations should always be verified prior to any work involving regulated materials.

Within the limitations of scope, schedule, and budget, our services have been executed in accordance with generally accepted practices in this area at the time this report was prepared. No other hazardous materials/wastes were investigated. No other conditions, expressed or implied, should be assumed.

2.0 ASBESTOS-CONTAINING MATERIAL (ACM) LOCATION SUMMARY

The following sections summarize the survey findings and analytical results for suspect ACM sampled at the subject site. ACM summary tables shown have been prepared for each general sample location: floors, walls, ceilings, etc. These tables are organized to show each material analyzed, its asbestos content, and sample location. Representative samples of suspect materials were sent to an accredited laboratory for analysis.

a. Bulk Sample Inspection Summary

The following suspect materials were identified and sampled. The material identification is listed by type, Homogeneous Area (HA) designation and description following:

2.1.1 Suspect Surfacing Materials

- TEX1, Heavy knockdown texture on drywall
- TEX2, White drywall – no texture
- TEX3, Rolled-on texture on drywall
- TEX4, Light knockdown texture on drywall
- TEX5, Light orange peel texture n drywall
- TEX6, Medium knockdown texture on drywall
- TEX7, Texture on concrete at vault
- TEX8, Sponge texture on drywall
- TEX9, Heavy knockdown texture on concrete
- TEX10, Heavy sponge texture on drywall
- TEX11, Heavy sponge texture on concrete
- TEX12, Medium knockdown texture on drywall
- TEX13, Trowel/swirl texture on drywall

2.1.2 Suspect Thermal System Insulation Materials

- INS1, Attic Insulation

2.1.3 Suspect Miscellaneous Materials

- CK1, hard tan exterior caulk
- CK2, soft tan exterior caulk

- CK3, soft white exterior caulk
- SG1, Screw gasket
- RF1, Roofing felt
- RRT1, Rolled asphaltic roof flashing with gray mastic and black tar
- SPC1, Solar panel caulk (white)
- SPC2, Solar panel caulk (soft gray)
- SPC3, Solar panel caulk (butyl gray)
- RC1, Pink roof caulk
- RTF1, Roof tar flashing
- TAR1, Old roofing tar
- TS1, Pink tile shingles
- AS1, White and green asphalt rolled flash
- BM1, Brick and mortar (exterior)
- FS1, Black foundation sealant
- CF1, Concrete foundation
- VD1, Purple vibration dampener
- VD2, Black vibration dampener
- CA1, Brown carpet with yellow mastic
- CA2, Light brown carpet with yellow mastic
- CA3, Gray carpet with yellow mastic
- VFT1, Gray 12” X 12” Floor tile with black/tan mastic
- VFT2, Light gray 12” X 12” floor tile with black mastic
- VFT3, Red 9” X 9” floor tile with black mastic
- VFT4, Brown 9” X 9” floor tile with black mastic
- LC1, Gray leveling compound
- LC2, White leveling compound
- VFT5, Tan 9” X 9” floor tile with black mastic
- CBM1, Black 3” cove base with dark brown mastic
- CBM2, Tan 3” cove base with tan and dark brown mastic
- CMU1, Green/off-white concrete masonry unit and block filler
- CMU2, White/tan concrete masonry unit and block filler
- BM2, White painted brick and mortar (interior)
- RFC1, Roof field core
- RFC2, Roof field core
- PW1, Parapet wall core
- DT1, Duct tape
- MOR1, Roof tile mortar
- PW2, White/tan parapet wall core
- TAR2, Black tar
- TP1, Transite panel
- LIP1, Shallow/filled fissure lay-in panels
- LIP2, Scratch/pinhole lay-in panels
- CMU3, Concrete masonry unit ceiling
- WPA1, Tan wall panel adhesive
- DWJC1, Drywall/joint compound heavy knockdown texture
- DWJC2, Drywall/joint compound – no texture
- DWJC3, Drywall/joint compound rolled on texture

- DWJC4, Drywall/joint compound medium knockdown texture
- DWJC5, Drywall/joint compound light knockdown texture with TEX8
- DWJC6, Drywall/joint compound heavy sponge texture
- DWJC7, Drywall/joint compound medium knockdown texture
- PC1, Patch concrete

3.0 ASBESTOS SAMPLE RESULTS TABLE

The following table summarizes sample results collected for this project. A copy of analytical results is attached in Appendix B to this report for your reference.

The following table summarizes the sample results collected from the interior and exterior of **420 Central Avenue, Dolores Colorado**:

Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
1	**CLK1-1**	**Hard tan exterior caulk**	**Main entry door west side**	**G/NF**	**5 SF**	**37% Chrysotile**
2	**CLK1-2**		**North exterior west cubby window**			**32% Chrysotile**
3	**CLK2-1**	**Soft tan exterior caulk**	**South exterior third window from west**	**G/NF**	**3 SF**	**38% Chrysotile**
4	CLK2-2		Sheriff entry door west side			ND
5	CLK3-1	Soft white exterior caulk	East exterior third window from south	G/NF	3 SF	ND
6	CLK3-2		North exterior rear entry door west side			ND
7	SG1-1	Screw gasket	Main entry roof south side	G/NF	3,500 SF	ND
8	SG1-2		North roof			ND
9	RF1-1	Roofing felt	Main entry roof southeast corner	G/NF	4,500 SF	ND
10	RF1-2		Building official roof northwest corner			ND
11	**RRT1-1**	**Rolled asphaltic roof flashing with gray mastic and black tar**	**Building official roof southeast corner**	**G/NF**	**10 SF**	**4% Chrysotile in paint**
12	**RRT1-2**		**Building official roof southeast corner**			**4% Chrysotile in paint 6% in black tar**
13	SPC1-1	Butyl white solar panel caulking	Main roof south middle	G/NF	10 SF	ND
14	SPC1-2		West solar panel east end			ND
15	SPC2-1	Soft gray solar panel caulking	West solar panel northeast corner	G/NF	1 SF	ND
16	SPC2-2		East solar panel west side at peak			ND
17	SPC3-1	Butyl gray solar panel caulking	West solar panels east of panels	G/NF	< 1 SF	ND
18	SPC3-2		West solar panels east of panels			ND
19	RC1-1	Pink roof caulk	Main roof east peak south end	G/NF	1 SF	ND
20	RC1-2		Main roof east peak east roof vent			ND
21	RC1-3		Main roof east peak east roof vent			ND

F= friable
NF=non-friable

G=good
D=damaged
SD= significantly damaged
SF=square feet
LF=linear feet

ND=none detected
*= multiple layers
Bold=ACM Sample

The following table summarizes the sample results collected from the interior and exterior of **420 Central Avenue, Dolores Colorado**:

Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
22	RTF1-1	Roof tar flashing	North side roof at meeting room and sheriff's office roof	G/NF	20 SF	ND
23	RTF1-2		South side roof at meeting room and sheriff's office roof			ND
24	**TAR1-1**	**Old roofing tar**	**Roof northwest corner north side**	**D/F**	**2 SF**	**11% Chrysotile**
25	**TAR1-2**		**Roof northwest corner west side**			**12% Chrysotile**
26	TS1-1	Pink tile shingles	Roof northwest corner south end	G/NF	55 SF	ND
27	TS1-2		Roof northwest corner			ND
28	AS1-1	White/green asphalt rolled flash	Building official northeast corner roof	G/NF	20 SF	ND
29	AS1-2		Building official northeast corner roof			ND
30	BM1-1	Exterior brick and mortar	Southwest corner exterior	G/NF	3192 SF	ND*
31	BM1-2		Southeast corner exterior			ND*
32	FS1-1	Black foundation sealant	East side exterior	G/NF	314 SF	ND
33	FS1-2		North side exterior			ND
34	CF1-1	Concrete foundation	Northwest corner sheriff's office	G/NF	3,500 SF	ND
35	CF1-2		Northwest corner of meeting section			ND
36	VD1-1	Purple vibration dampener	East attic	G/NF	4 SF	ND*
37	VD1-2		East attic			ND*
38	VD2-1	Black vibration dampener	West attic	G/NF	12 SF	ND*
39	VD2-2		Center attic			ND*
40	VD2-3		Center attic			ND*
41	CA1-1	Brown carpet with yellow mastic	West storage at doorway	G/NF	746 SF	ND
42	CA1-2		Clerks reception northeast corner			ND

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Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
43	CA2-1	Light brown carpet with yellow mastic	Break room east wall center	G/NF	2,045 SF	ND*
44	CA2-2		Building official east wall center			ND*
45	CA3-1	Gray carpet with yellow mastic	East storage southwest corner	G/NF	253 SF	ND*
46	CA3-2		IT room north center			ND*
47	VFT1-1	Gray 12” X 12” floor tile with tan mastic	Main entry hall southwest corner	G/F	200 SF	ND*
48	VFT1-2		Main entry hall northwest corner			ND*
49	VFT2-1	Light gray 12” X 12” floor tile with black mastic	East restroom southwest corner	G/F	382 SF	ND*
50	VFT2-2		Hallway at base of stairs to attic			ND*
51	**VFT3-1**	**Red 9” X 9” floor tile with black mastic**	**West storage at door center**	**G/F**	**127 SF**	**7% Chrysotile in floor tile Mastic was non-detect**
52	**VFT3-2**		**IT room southeast corner**			**7% Chrysotile in floor tile Mastic was non-detect**
53	**VFT4-1**	**Brown 9” X 9” floor tile with black mastic**	**West storage at door center**	**G/F**	**127SF**	**12% Chrysotile in floor tile Mastic was non-detect**
54	**VFT4-2**		**IT room southeast corner**			**12% Chrysotile in floor tile Mastic was non-detect**
55	**LC1-1**	**Gray leveling compound**	**Treasurer office west wall center**	**G/F**	**1,400 SF**	**9% Chrysotile in brown floor tile Leveling compound was non-detect**
56	**LC1-2**		**Managers office northwest corner**			**5% Chrysotile in brown floor tile Leveling compound was non-detect**
57	LC2-1	White leveling compound	Meeting room north center wall northwest corner	G/F	2,045 SF	ND*
58	LC2-2		Meeting room south center at wooden post			ND*
59	**VFT5-1**	**Tan 9” X 9” floor tile**	**Office supply closet center floor**	**G/F**	**872 SF**	**12% Chrysotile in floor tile Mastic was non-detect**
60	**VFT5-2**		**Vault south floor at entrance**			**12% Chrysotile in floor tile Mastic was non-detect**
61	**VFT5-3**		**Vault south floor at entrance**			**12% Chrysotile in floor tile Mastic was non-detect**
62	CBM1-1	Black 3” cove base with tan mastic	Main entry northeast corner	G/NF	108 SF	ND*
63	CBM1-2		East restroom southeast corner			ND*

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Bold=ACM Sample

Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
64	CBM2-1	Tan 3” cove base with tan/dark brown mastic	Managers office northwest corner	G/NF	47 SF	ND*
65	CBM2-2		Clerks reception at doorway to treasurer office			ND*
66	**CMU1-1**	**Green/off-white concrete masonry unit and block filler**	**Break room southwest corner**	**G/F**	**610 SF**	**2% Chrysotile in granular material**
67	**CMU1-2**		**Meeting room west wall south side**			**2% Chrysotile in granular material**
68	**CMU1-3**		**Meeting room northeast corner**			**‘Trace’ Chrysotile in block filler**
69	**CMU1-4**		**West storage southwest corner**			**‘Trace’ Chrysotile in block filler**
70	**CMU1-5**		**East restroom northeast corner**			**‘Trace’ Chrysotile in block filler**
71	**CMU1-6**		**Hallway northeast corner at base of stairs**			**‘Trace’ Chrysotile in block filler**
72	**CMU1-7**		**Clerks reception east wall center**			**‘Trace’ Chrysotile in block filler**
73	**CMU1-8**		**Clerks reception south wall center**			**‘Trace’ Chrysotile in block filler**
74	**CMU1-9**		**Janitor closet south wall center**			**‘Trace’ Chrysotile in block filler**
75	CMU2-1	White/tan concrete masonry unit and block filler	Main mill east wall	G/F	4,000 SF	ND*
76	CMU2-2		Main mill south side floor			ND*
77	CMU2-3		Main mill south side floor			ND*
78	BM2-1	White interior brick and mortar	Building official office east wall south side	G/NF	165 SF	ND*
79	BM2-2		Building official office east wall northeast corner			ND*
80	BM2-3		East cubby southeast corner			ND*
81	BM2-4		East cubby southeast corner			ND*

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Bold=ACM Sample

Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
82	TEX1-1	**Heavy knockdown texture on drywall**	Main entry southeast corner	**G/F**	**1,880 SF**	ND*
83	**TEX1-2**		**Treasurer office southwest corner**			**3% Chrysotile in off-white compound**
84	**TEX1-3**		**Main hallway southwest corner**			**3% Chrysotile in off-white compound**
85	TEX1-4		Main hallway northeast corner			ND*
86	TEX1-5		Managers office southwest corner			ND*
87	TEX2-1	Drywall – no texture	West restroom southeast corner	G/F	728 SF	ND
88	TEX2-2		East restroom southwest corner			ND
89	TEX2-3		Restroom hallway north wall center at pipe			ND
90	TEX3-1	Rolled-on texture on drywall	East storage southeast corner	**G/F**	864 SF	ND*
91	TEX3-2		East storage northeast corner			ND*
92	TEX3-3		IT room northeast corner			ND*
93	TEX4-1	Light knockdown texture on drywall	Meeting room southeast corner	G/F	1,508 SF	ND*
94	TEX4-2		Meeting room southwest corner			ND*
95	TEX4-3		Meeting room north wall center east			ND*
96	TEX4-4		Break room south wall west side			ND*
97	TEX4-5		Meeting room north side west wall center			ND*
98	TEX5-1	**Light orange peel texture on drywall**	Office supply closet east wall center	**G/F**	**396 SF**	ND*
99	TEX5-2		Office supply closet west wall above door			ND*
100	**TEX5-3**		**Office supply closet north wall west of door**			**3% Chrysotile in off-white compound**
101	**TEX5-4**		**Office supply closet north wall west of door**			**3% Chrysotile in off-white compound**

F= friable
NF=non-friable

G=good
D=damaged
SD= significantly damaged
SF=square feet
LF=linear feet

ND=none detected
*= multiple layers
Bold=ACM Sample

Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
102	TEX6-1	Medium knockdown texture on drywall	Break room northeast corner	G/F	488 SF	ND*
103	TEX6-2		West storage room east wall center			ND*
104	TEX6-3		West storage room north wall center			ND*
105	TEX7-1	Texture on concrete at vault	Vault exterior west side	G/F	90 SF	ND*
106	TEX7-2		Vault exterior east side			ND*
107	TEX7-3		Vault exterior above vault door			ND*
108	TEX8-1	**Sponge texture**	Break room chase east wall center	**G/F**	**252 SF**	ND*
109	TEX8-2		Break room chase east wall base			ND*
110	**TEX8-3**		**Break room chase north wall**			**2% Chrysotile in off-white compound**
111	TEX9-1	Heavy knockdown texture on concrete	Building official west wall center north	**G/F**	189 SF	ND*
112	TEX9-2		Building official west wall southwest corner			ND*
113	TEX9-3		Building official west wall northwest corner			ND*
114	TEX10-1	Heavy sponge texture on drywall	East cubby northeast corner	**G/F**	185 SF	ND*
115	TEX10-2		Center wall between cubbies – east side			ND*
116	TEX10-3		West cubby west wall center			ND*
117	TEX11-1	Heavy sponge texture on concrete	South former jail cell east wall north of door	**G/F**	150 SF	ND*
118	TEX11-2		South former jail cell north wall center			ND*
119	TEX11-3		North former jail cell east wall center under window			ND*
120	TEX11-4		North former jail cell east wall center under window			ND*

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Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
121	TEX12-1	Medium knockdown texture	Building official office south wall east side	G/F	36 SF	ND*
122	TEX12-2		Building official office south wall west side			ND*
123	TEX12-3		Sheriff's office south wall above door			ND*
124	TEX13-1	Trowel/swirl texture on drywall	Sheriff's office west wall south side	G/F	152 SF	ND*
125	TEX13-2		Sheriff's office west wall center			ND*
126	TEX13-3		Sheriff's office west wall northeast corner above entry wall			ND*
127	RFC1-1	Roof field core	East roof northeast corner	G/NF	1,800 SF	ND*
128	RFC1-2		East roof southwest corner			ND*
129	RFC2-1	Roof field core	West roof south end	G/NF	1,590 SF	ND*
130	RFC2-2		West roof north end			ND*
131	PW1-1	**Parapet wall core**	East roof west side north end	**G/NF**	**100 SF**	ND*
132	**PW1-2**		**East roof west side south end**			**18% Chrysotile in black fibrous tar**
133	**DT1-1**	**Duct tape**	**North former jail cell ceiling duct**	**G/F**	**3 SF**	**55% Chrysotile**
134	**DT1-2**		**South former jail cell ceiling duct north**			**55% Chrysotile**
135	**DT1-3**		**South former jail cell ceiling duct south**			**65% Chrysotile**
136	INS1-1	Attic Insulation	East roof southwest corner	G/F	3,300 SF	ND
137	INS1-2		West roof middle			ND
138	MOR1-1	Roof tile mortar	West roof north side east	G/F	2- SF	ND
139	MOR1-2		West roof north side west			ND
140	MOR1-3		West roof north side west			ND

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Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
141	**PW2-1**	**White/tan parapet wall**	**West roof north side east end**	**G/NF**	**100 SF**	**20% Chrysotile in black tar**
142	**PW2-2**		**West roof north side middle**			**15% Chrysotile in black tar**
143	TAR2-1	Black tar	East roof at vent south of access	G/NF	9 SF	ND
144	TAR2-2		East roof at vent south of access			ND
145	**TP1-1**	**Transite Panel**	**West storage room center under window**	**G/NF**	**141 SF**	**20% Chrysotile**
146	**TP1-2**		**Clerk's office northeast corner**			**20% Chrysotile**
147	LIP1-1	Shallow/filled fissure lay-in panel	West storage ceiling center	**G/NF**	190 SF	ND
148	LIP1-2		IT room south wall center ceiling			ND
149	LIP2-1	Scratch/pinhole lay-in panels	East storage ceiling center	**G/NF**	190 SF	ND
150	LIP2-2		IT room northwest corner ceiling			ND
151	CMU3-1	Concrete masonry unit ceiling	Building official office E wall center	**G/NF**	792 SF	ND
152	CMU3-2		South former jail cell center ceiling			ND
153	WPA1-1	Tan wood panel adhesive	Managers office north wall	**G/NF**	570 SF	ND*
154	WPA1-2		Managers office east wall			ND*
155	DWJC1-1	Drywall/joint compound heavy knockdown	Treasurer's office northwest corner	G/F	Not measured	ND*
156	DWJC1-2		Hallway east wall at door to managers office			ND*
157	DWJC2-1	Drywall/joint compound no texture	East restroom northwest corner	G/F	Not measured	ND*
158	DWJC2-2		West restroom southwest corner			ND*

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Data #	Sample Number	Material Description	Sample Location	Condition/ Friability	Approx. Quantity	Analytical Result
159	DWJC3-1	Drywall/joint compound rolled on texture	IT room northwest corner	G/F	Not measured	ND*
160	DWJC3-2		East storage southwest corner			ND*
161	DWJC3-3		East storage southwest corner			ND*
162	DWJC4-1	Drywall/joint compound	West storage southeast corner	G/F	Not measured	ND*
163	DWJC4-2		West storage northeast corner			ND*
164	DWJC5-1	**Drywall/joint compound with TEX8**	Meeting room north wall center northeast corner	**G/F**	**Not measured**	ND*
165	**DWJC5-2**		**Break room northwest corner**			**2% Chrysotile in off-white compound in TEX8**
166	DWJC6-1	Drywall/joint compound	West cubby south wall	G/F	Not measured	ND*
167	DWJC6-2		West cubby north wall			ND*
168	DWJC7-1	Drywall/joint compound	Sheriff's office east wall above hall	G/F	Not measured	ND*
169	DWJC7-2		Sheriff's office east wall center			ND*
170	PC1-1	Patch concrete	North jail cell north wall	G/F	12 SF	ND
171	PC1-2		North jail cell north wall			ND

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Bold=ACM Sample

4.0 CONCLUSIONS and RECOMMENDED ACTIONS

4.1 Asbestos-Containing Materials – General

Removal, in accordance with Colorado Department of Public Health and Environment's (CDPHE) Regulation No. 8, is required of materials with an asbestos content greater than one percent (1%) that are friable or will be made friable during renovation or demolition activities. Friable means that the material, when dry may be crumbled, pulverized, or reduced to powder by hand pressure.

CDPHE
Removal, in accordance with the Colorado Department of Public Health and Environment's (CDPHE) Regulation No. 8, is required of materials with an asbestos content of greater than one percent (1%) by PLM analysis that are friable or will be made friable during renovation or demolition activities. Friable means that the material, when dry may be crumbled, pulverized, or reduced to powder by hand pressure.

EPA
The National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations set forth by the U.S. Environmental Protection Agency control asbestos emissions from renovation and demolition activities.

OSHA
The Occupational Safety and Health Administration (OSHA) Construction Asbestos Standard 29 CFR 1926.1101 contains work practice and engineering control requirements and prohibitions that must be observed regardless of the percentage of asbestos in the installed construction materials. The standard also has exposure-based requirements consisting of a 0.1 fiber/cc 8 hour Time Weighted Average (TWA) Personal Exposure Limit (PEL) and a 1 fiber/ cc 30-minute excursion limit.

OSHA-asbestos definition. The one percent cut off is consistent with the definition of an Asbestos containing Material (ACM) under the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP). However, the OSHA standard has a definition for both "asbestos" and "asbestos-containing materials." The OSHA definition of asbestos does not have a one percent cut off, therefore, asbestos that is present in percentages less than one percent continues to be covered by the OSHA standard, 29 CFR 1926.1101. Work operations conducted in areas where the asbestos or asbestos product is below one percent is an "unclassified" operation. The employer still must follow the requirements in paragraphs (g)(1) [except (g)(1)(i)], (g)(2) and (g)(3) that describe engineering and work practice controls operation as well as prohibitions that must be observed regardless of the percentage of asbestos in the installed construction materials. The standard also has exposure-based requirements consisting of a 0.1 fiber/ cc 8 hour Time Weighted Average (TWA) Personal Exposure Limit (PEL) and a 1 fiber/ cc 30-minute excursion limit.

OSHA Hazard Communication

OSHA Asbestos Standard 29CFR1926.1101 contains information necessary for communication of hazards related to asbestos in the work place. Section (k) Communication of Hazards describes the duties of building owners and contractors for providing written or verbal notification as to the presence, location, and quantities of ACM. Notification also applies to multi-employer worksites, employees and tenants who

will be in and around areas where ACM will be disturbed. Notification should be made prior to any work being performed in areas where ACM is identified and will be effected by renovation.

The following sections describe materials that were identified during this inspection and recommended actions prior to renovation or demolition.

4.1.1 Friable ACM

The following materials were identified as friable ACM during the inspection, or will be rendered friable during demolition:

- TAR1, Black roof tar – This material was damaged and brittle due to age and weathering
- VFT3, Red and white 9" X 9" Vinyl floor tile – This material will likely be rendered friable during demolition.
- VFT4, Brown 9" X 9" Vinyl floor tile – This material will likely be rendered friable during demolition.
- LC1, Gray leveling compound and brown tile – The gray leveling compound was non-detect for asbestos. The floor tile will likely be rendered friable during demolition.
- VFT5, Tan 9" X 9" Vinyl floor tile – This material will likely be rendered friable during demolition.
- CMU1, Green/off-white concrete masonry unit and block filler – This material will be rendered friable during demolition.
- TEX1, Heavy knockdown texture on drywall
- TEX8, Sponge texture on drywall
- DT1, Duct tape
- DWJC5, Drywall/Joint Compound on light knockdown texture with TEX8
- TP1, Transite Panels

Black tar and felt tar wrap are classified as a non-friable materials. Tar materials are generally pliable and are only a potential health concern if they become dry and brittle from age and continued exposure to heat and air. Abrasive actions such as cutting, drilling, grinding, etc. should not be performed on asbestos-containing roofing materials. Alteration to or the removal of these materials requires adherence to all applicable local, state, and federal regulations concerning asbestos removal and disposal. Periodic condition inspections are recommended until the materials are removed.

Floor tile, and associated mastics are Category I non-friable ACM. Category I materials are defined as asbestos-containing resilient floor coverings, asphalt roofing products, packings and gaskets. Asbestos-containing mastic is also considered a Category I material. Care should be exercised when cleaning floor tile surfaces. Loose and damaged floor tiles should be repaired or removed using trained personnel, wearing proper personal protective equipment (PPE), and following proper O&M procedures. A wet cleaning or polishing agent should always be used when buffing is performed. Abrasive actions such as dry buffing, drilling, grinding, hammering, sawing, etc. should not be performed unless proper precautions are followed. Alterations to or the removal of these materials requires adherence to all applicable local, state, and federal regulations concerning asbestos removal and disposal. Periodic condition inspections are recommended until the materials are removed.

CMU block fillers are a chalky first (primer) coating applied to the CMU's to fill the pits and voids of the blocks prior to finish coatings being applied. The CMU block filler coatings are classified as non-friable as long as the block filler compounds remain painted and in good condition. If the block filler compounds are damaged by cutting, chipping drilling, sanding etc., or damaged by the weather, water or fire, the block

filler compounds could become friable and release fibers. Block filler compounds must be removed by asbestos certified personnel prior to building demolition or renovation.

Drywall Texturing Compound is classified as a surfacing material and is generally non-friable as long as the texturing compounds remain painted and in good condition. If the texturing compounds are damaged by cutting, drilling, sanding etc., or damaged by water or fire, the texturing compounds could become friable and release fibers. OSHA has classified the removal of drywall texturing compounds as ***Class I*** asbestos work, the most hazardous class of asbestos jobs. Class I asbestos work involves the removal of asbestos-containing or presumed asbestos-containing thermal insulation and sprayed-on or troweled-on surfacing material. Texturing compounds must be removed by properly asbestos trained personnel, prior to building demolition or renovation.

Duct tape and wrap are classified as friable materials. The asbestos-containing tape and wrap should not be removed or altered without adhering to all applicable local, state, and federal regulations concerning asbestos removal and disposal. Caution should be exercised when cleaning the surrounding areas or when accessing areas containing duct insulation and wrap. Contact with these materials should be avoided to diminish the potential for damage and the airborne release of asbestos fibers. Periodic condition inspections are recommended until the materials are removed.

Cementitious Panels are classified as non-friable materials. These materials can become friable if aging and corrosion causes deterioration of the panels. Abrasive actions such as drilling, hammering, cutting, grinding, etc. will also cause the materials to become friable and should not be performed during maintenance activities without following proper precautions. Any removal of or alteration to asbestos-containing cementitious panels requires adherence to all applicable local, state, and federal regulations concerning removal and disposal of asbestos materials. Periodic condition inspections are recommended until the materials are removed.

4.1.2 Non-friable ACM

The following materials were identified as non-friable ACM during the inspection:

- CLK1, Hard tan exterior caulking
- CLK2, Soft tan exterior caulking
- RRT1, Rolled asphaltic roof flashing with gray mastic and black tar
- PW1, Parapet wall core
- PW2, Parapet wall core
-

Caulking and sealant materials are classified as non-friable unless they have become dry and brittle from age, heat, air, etc. Caulking materials are generally used as sealants, and are applied in narrow beads along window frames, door frames, wall corners, etc… If these materials become friable and require removal, all local, state, and federal regulations concerning asbestos removal and disposal must be followed. Periodic condition inspections are recommended until the materials are removed.

Roofing Materials are classified and non-friable material unless severely damaged by heat, air, or water erosion. Generally, if roofing materials are damaged to the extent where the materials are classified as friable, the roofing system will fail and replacement will be necessary. If a roofing system needs to be

replaced due to failure or for renovations, all applicable local, state, and federal regulations concerning asbestos removal and disposal must be followed. Abrasive actions such as cutting, drilling, grinding, etc. should not be performed on asbestos-containing roofing materials. Periodic condition inspections are recommended until the materials are removed.

4.1.3 Materials Containing 1% or Less Asbestos (Trace)

- None

4.1.4 RACM vs NON-RACM

ACM identified that are non-friable usually remain non-friable in their current condition; however, they may become friable during renovation or demolition activities. These materials must be removed prior to activities that will render them friable including (drilling, sanding, grinding, or cutting). Removal is recommended before demolition unless minimal or no breakage is reasonably achievable.

Removal of non-friable ACM must be performed by trained personnel according to procedures outlined in current regulations. Removal activities must be completed in compliance with the OSHA Asbestos in Construction standard 29 CFR 1926.1101 as a Class II work operation, which includes engineering controls and monitoring. Some landfills allow the materials to be disposed with construction debris; however, the waste hauler and landfill must be notified that they are receiving a Category II non-friable asbestos material. If the material is removed as an asbestos removal project it should be disposed of as non-friable asbestos waste.

Work Plan for Removal
FEI recommends completing a Work Plan prior to renovation which outlines ACM to be removed, work procedures and disposal requirements.

4.1.5 Other Regulations

Any vehicle used to transport ACM waste must have identifying markings during loading and unloading, and all containers of ACM waste must be labeled with the name of the waste generator as well as the location from which it is coming.

5.0 SUMMARY OF UNIVERSAL HAZARDOUS WASTE INVENTORY

5.1 LED Light Fixtures

Light emitting diode (LED) light fixtures may contain circuit boards and other components that are considered electronic waste. Electronic waste can contain heavy metals and other materials that require proper handling and disposal. This facility contained the following:

- ***Approximately 5 LED light fixtures***

5.2 Mercury Containing Items

This facility contained the following:

- ***Approximately 160 fluorescent bulbs that may contain mercury***
- ***Approximately 6 thermostats that may contain mercury***
- ***Approximately 1 mercury/sodium vapor that may contain mercury***

- ***Approximately 23 incandescent bulbs that may contain mercury***
- ***Approximately 2 compact fluorescent bulbs that may contain mercury***

Fluorescent bulbs, thermostats, gauges and thermometers may contain a small quantity of mercury that can be harmful to the environment and to human health when improperly managed. Mercury is regulated under RCRA, which is administered by the US Environmental Protection Agency. Under current Federal law, mercury-containing lamps such as fluorescent and HID lamps may be hazardous waste. In addition, incandescent and HID lamps may contain small quantities of lead that can also be potentially harmful to human health and the environment. To prevent these toxic materials from contaminating the environment, dispose of used lamps responsibly.

Federal Regulations

Resource Conservation and Recovery Act (RCRA)

RCRA requires generators of solid wastes containing toxic constituents (such as mercury) to determine whether or not the waste is hazardous by using generator knowledge or testing representative samples of that waste. According to RCRA, generators of used fluorescent and HID lamps are responsible for determining whether their lamp wastes are hazardous. If you do not test used fluorescent and HID lamps and prove them non-hazardous, assume they are hazardous waste and dispose them accordingly.

Generator Knowledge

To use generator knowledge in making a hazardous waste determination, the generator must have information on possible hazardous constituents and their quantities in the waste. Sometimes manufacturers generate solid waste as part of their manufacturing process, and can use process knowledge to determine whether the waste exhibits a characteristic of hazardous waste. However, with expired lamp wastes the generator has little process knowledge on which to make a hazardous waste determination (since he is not the manufacturer). The generator could base a determination on data obtained from the manufacturer, or he could refer to EPA's study entitled "Analytical Results of Mercury in Fluorescent Lamps" (dated 5/15/92, available in EPA's RCRA docket)

Testing Lamps to Determine If They Are Hazardous Waste

The Toxicity Characteristic Leaching Procedure (TCLP) identifies whether a waste is toxic and must be managed as hazardous waste. The test attempts to replicate the conditions in a municipal landfill to detect the mercury concentration of water that would leach from the landfill. If the mercury concentration exceeds 0.2 milligrams per liter, the lamp fails the toxicity test and is managed as hazardous waste. When mercury-containing lamps are tested using the TCLP, the test results can vary considerably, depending on the lamp manufacturer, the age of the lamp, and the laboratory procedures used. These lamps often fail the TCLP. If you do not use the TCLP to verify that your lamps are non-hazardous, you should (1) assume that they are hazardous waste, and (2) manage them as hazardous waste. Contact your state hazardous waste agency for information on laboratories in your state that conduct the TCLP test. The cost to test one lamp is approximately $140. However, due to variability in TCLP testing for lamps, EPA recommends that more than one lamp be tested to make a hazardous waste determination.

For more information on RCRA regulations and waste identification, storage, transportation, and disposal, contact the RCRA hotline at 1-800-424-9346

Conditionally Exempt Small Quantity Generators

A conditionally exempt small quantity generator, as defined under RCRA, is a generator who disposes 100 kg or less of hazardous waste per month. Generators must add the weight of all the hazardous waste (lamps plus other hazardous wastes) that their business generates during a month. For lamp disposal, this quantity of waste includes the mercury in the lamp along with the glass, phosphors, and other materials (the weight of the entire lamp).

Conditionally exempt small quantity generators are excused from RCRA identification, storage, treatment, and disposal regulations. To qualify as a conditionally exempt small quantity generator (if the only hazardous waste is mercury-containing lamps), a generator must dispose of fewer than 300-350 four-foot T12 fluorescent lamps or 400-450 four-foot T8 fluorescent lamps per month, depending upon the approximate weight of each lamp. EPA encourages all users of fluorescent and HID lamps to dispose of mercury-containing lamps responsibly to limit the release of mercury into the environment.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

CERCLA also regulates the disposal of mercury-containing lamps. The law requires building owners and waste generators to notify the National Response Center at (800) 424-8802 under certain conditions. For example, they must notify if they dispose of a pound or more of mercury (roughly equivalent to 11,000 four-foot T12 fluorescent lamps) in a 24-hour period. All generators of mercury-containing lamp waste (large, small, and conditionally exempt small generators) could be held liable in any subsequent Superfund cleanup at a land disposal site, incinerator, storage site, or recycling or other treatment facility.

Disposal of Used Fluorescent and HID Lamps

The following sections outline the storage, packing, transportation and disposal options for used mercury-containing lamps discarded as hazardous waste.

Used lamps that test hazardous or are determined hazardous by the generator must be disposed of at a hazardous waste landfill or sent to a lamp recycling facility. Mercury-containing lamps should never be incinerated. Most municipal incinerators and solid waste combustors lack the necessary control technologies to effectively remove mercury from the flue gas before it is released into the atmosphere.

5.4 Polychlorinated Biphenyls (PCBs)

The facility structure contained the following:

- ***Approximately 41 fluorescent fixtures that could contain PCB ballasts***
- ***Approximately 1 mercury/sodium vapor lamp fixtures that could contain PCB ballasts***
- ***Approximately 1 pole mounted transformer that could contain PCBs***

PCB-containing materials are classified in the regulations according to the concentration of PCBs present. There are three classifications of PCB-containing materials:

- PCB >=500 ppm
- PCB-contaminated 5-500 ppm
- TSCA-regulated 50-500 ppm
- Non-PCB <5 ppm

Mixtures of PCB-containing materials are subject to all requirements of the highest PCB concentration classification within the mixture. The deliberate dilution of PCB materials to reduce the concentration of PCBs in a resultant mixture is prohibited. Federal and some state regulations may differ on PCB classifications for waste. Under federal regulations, waste with a concentration below 50-ppm PCB may be defined as non-PCB waste; whereas, under state regulations waste must have a concentration below 5-ppm PCB to be defined as non-PCB waste.

Fluorescent fixture ballasts

The primary concern regarding the disposal of used fluorescent ballasts is the health risk associated with PCBs. Human exposure to these possible carcinogens can cause skin, liver, and reproductive disorders. Fluorescent and high-intensity discharge (HID) ballasts contain a small capacitor that may contain high concentrations of PCBs (greater than 90% pure PCBs or 900,000 ppm). These chemical compounds were widely used as insulators in electrical equipment such as capacitors, switches, and voltage regulators through the late 1970s.

The Toxic Substances Control Act (TSCA) was enacted in 1976, and subsequently banned the production of PCBs in the United States. The specific regulations governing the use and disposal of PCBs are found in Volume 40 Code of Federal Regulations (CFR) Part 761.

The proper method for disposing used ballasts depends on several factors, such as the type and condition of the ballasts and the regulations or recommendations in effect in the state(s) where you remove or discard them. TSCA specifies the disposal method for ballasts that are leaking PCBs. In addition, generators of PCB-containing ballast wastes may be subject to notification and liability provisions under the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) (also known as "Superfund." To select the appropriate disposal method for PCB-containing ballasts, refer to the decision flow chart on the following page.

Because disposal requirements vary from state to state, check with regional, state, or local authorities for all applicable regulations in your area. For your convenience, information resources are listed at the end of this document.

Identifying PCB Ballasts

- Use the following guidelines to identify ballasts that contain PCBs.
- All ballasts manufactured through 1979 contain PCBs.
- Ballasts manufactured after 1979 that do not contain PCBs are labeled "No PCBs."
- If a ballast is not labeled "No PCBs," assume it contains PCBs.
- It is extremely important to find out if a ballast containing PCBs is leaking before you remove it from the fixture, so that you can handle it properly.
-

5.5 Refrigerants, Halogenated Fluorocarbons, Chlorofluorocarbons (CFCs)

The planned renovation work areas contained the following:

- ***Approximately 1 drinking fountain that could contain CFCs.***
- ***Approximately 2 refrigerators that could contain CFCs.***
- ***Approximately 1 window mounted A/C unit that could contain CFCs.***

The building owner or contractor must verify that all refrigerants from air conditioning/refrigeration appliances have been properly recovered in accordance with AQCC Regulation No. 15 prior to demolition (for information on CFC requirements call 303-692-3100). All persons handling CFC's must be trained and certified. No one may intentionally release these compounds. All CFC's must be captured using approved recovery equipment.

5.6 Smoke detectors

The planned renovation work areas contained the following:

- ***Approximately 3 smoke detector that could contain a radioactive source.***

The two types of smoke detectors most commonly encountered in the United States are ionization detectors and photoelectric detectors. Ionization-type smoke detectors contain a very tiny amount of radioactive material. Photoelectric-type smoke detectors do not contain any radioactive material. Combination smoke detectors, which contain both ionization and photoelectric smoke sensors, also contain a very tiny amount of radioactive material.

If a smoke detector contains radioactive material, it is required by law to have a warning label on the body of the smoke detector. The label is usually located at the "top" of the detector, facing the mounting base that attaches to the ceiling or wall. Remove the smoke detector from its base, and look at the label. A typical label might read:

This product is designed to detect products of combustion using ionization technology. It contains 0.9 microcurie of Americium 241, a radioactive material.

The label may have the international symbol for radiation on the label. 

If a smoke Detector does not include either the warning or the radiation symbol on the label, and if there is no evidence that the label has been removed or destroyed, it is safe to assume that the device does not contain any radioactive material. If the label has been removed or destroyed, it is best to treat the device as if it is an ionization unit, and dispose of it as described below.

Recycling is almost always preferable to disposal in a landfill or an incinerator. For up-to-date information on recycling of electronics (eCycling), visit the EPA's eCycling Web page: http://www.epa.gov/epawaste/conserve/materials/ecycling/basic.htm

Ionization smoke detectors containing less than 1 µCi of Americium-241 are exempt from Nuclear Regulatory Commission regulations. This means that Federal Law does not prohibit the disposal of these detectors in the normal municipal waste stream. There are, however, a number of State and local regulations and/or laws that do prohibit disposal of ionization smoke detectors in the municipal waste stream. Contact the local solid waste management authority for up-to-date information about local regulations or directives. Older ionization detectors that contain more than 1 µCi of Americium-241 are subject to regulation by the NRC, and they are subject to more stringent requirements. Smoke detectors with 5 µCi or more of Americium-241 should never be disposed of in the municipal waste stream.

This table provides disposal guidelines for ionization smoke detectors.

If the amount of Americium-241 in the detector is	Then dispose of the detector in this way:
Less than 5 µCi	These smoke detectors should be recycled if possible unless State or local regulation requires otherwise, they may be disposed of as normal municipal waste.
More than 5 µCi	These smoke detectors must be returned to the manufacturer for proper disposal. The entire smoke detector needs to be returned to the manufacturer by ground mail; not via airmail. Contact the manufacturer directly, and they will provide instructions regarding the special packaging and shipping requirements that apply to these detectors.

5.7 Household Waste

Household hazardous waste (HHW), sometimes called retail hazardous waste or "home generated special materials', is post-consumer waste which qualifies as hazardous waste when discarded. It includes household chemicals and other substances for which the owner no longer has a use, such as consumer products sold for home care, personal care, automotive care, pest control and other purposes. These products exhibit many of the same dangerous characteristics as fully regulated hazardous waste due to their potential for reactivity, ignitability, corrosivity, toxicity, or persistence. Examples include drain cleaners, oil paint, motor oil, antifreeze, fuel, poisons, pesticides, herbicides and rodenticides, fluorescent lamps, lamp ballasts, smoke detectors, medical waste, some types of cleaning chemicals, and consumer electronics (such as televisions, computers, and cell phones). This facility contained the following:

- ***Approximately 6 fire extinguishers***
- ***Approximately 14 bottles of cleaning products***
- ***Approximately 2 gallon bottles of antifreeze***

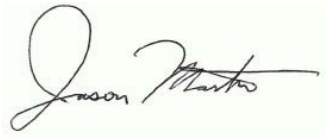
6.0 LIMITATIONS

This report describes the installed locations and conditions of ACM identified in the facility during the inspection. FEI represents that our services are performed within the limits prescribed by applicable regulations and in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is made to the client, expressed or implied, and no warranty or guarantee is included or intended.

This document is not intended to be used as a bid document for the removal, repair, encapsulation, enclosure, or Operations and Maintenance (O&M) of asbestos containing materials. Foothills Environmental, Inc. can prepare asbestos abatement specifications, scope of work, project design, and bid documents for this project at the clients' request. This document describes the locations and conditions of ACM identified in the facility during the inspection. This report is limited to the scope of work identified in this report and should not be construed to represent anything outside the scope of work.

Prepared by: Reviewed by:

Haden Wilde
Industrial Hygienist
CDPHE Asbestos Inspector #28726



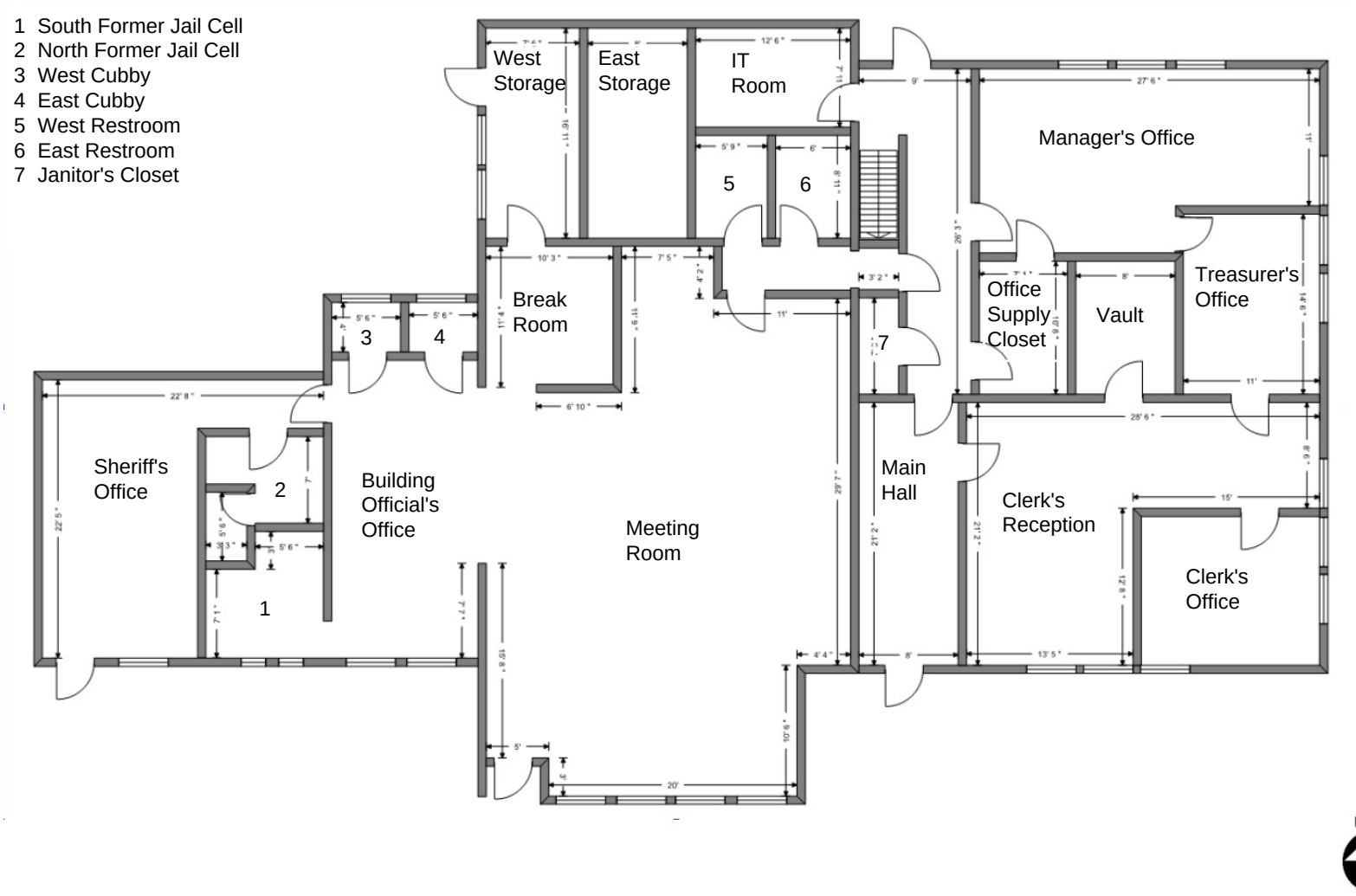
Jason Martin, CIH, CSP
Senior Industrial Hygienist
CDPHE Asbestos Inspector #16218

Appendix A

Sample and Material Location Drawings

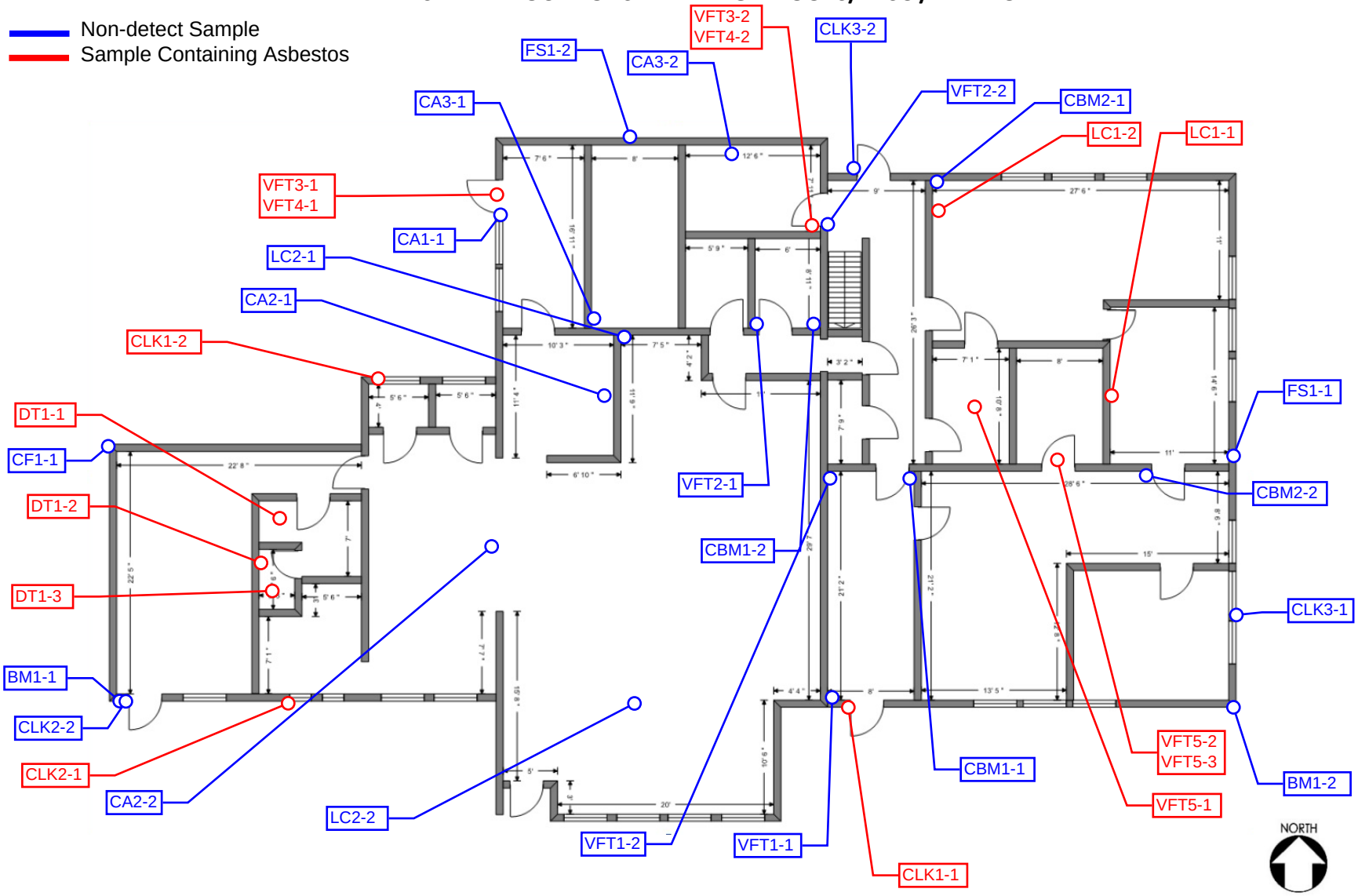
FIGURE LOCATIONS GUIDELINE

1 South Former Jail Cell
2 North Former Jail Cell
3 West Cubby
4 East Cubby
5 West Restroom
6 East Restroom
7 Janitor's Closet



SAMPLE LOCATIONS DRAWING - FLOORS/MISC./EXTERIOR

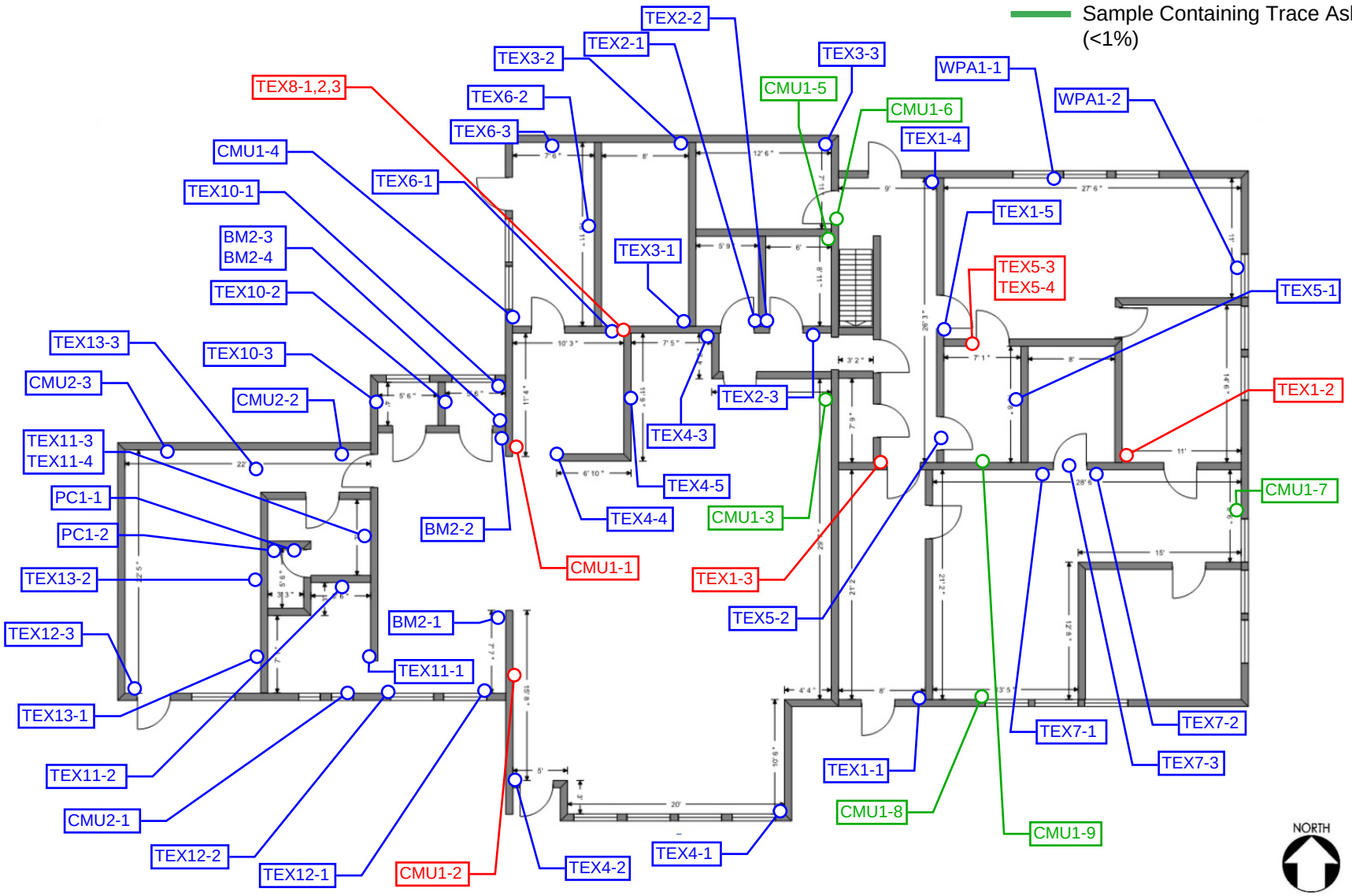
Non-detect Sample
Sample Containing Asbestos



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 1
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

SAMPLE LOCATIONS DRAWING - WALLS

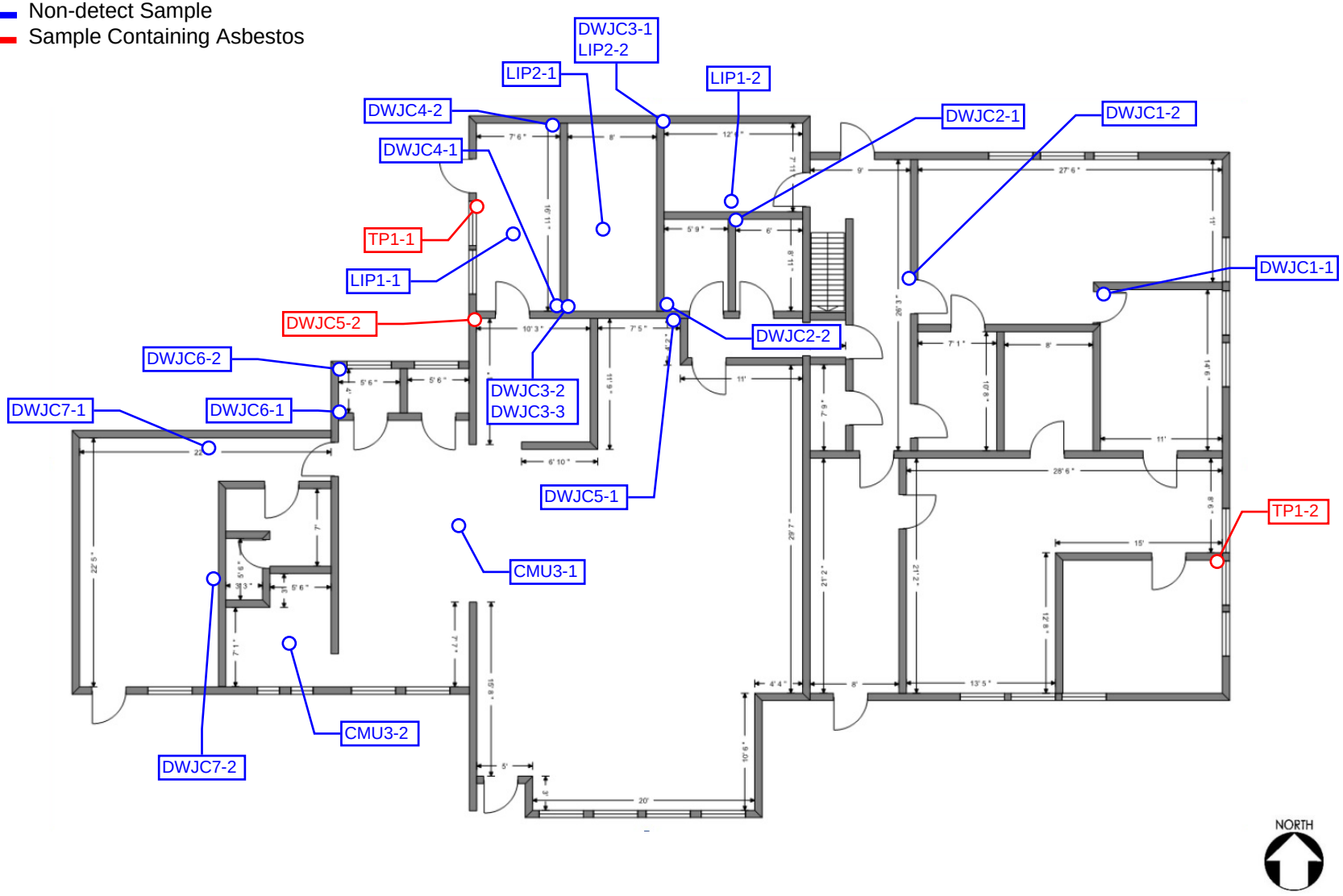
Non-detect Sample
Sample Containing Asbestos
Sample Containing Trace Asbestos (<1%)



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 2
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

SAMPLE LOCATIONS DRAWING – CEILINGS/JOINT COMPOUND/TRANSITE PANELS

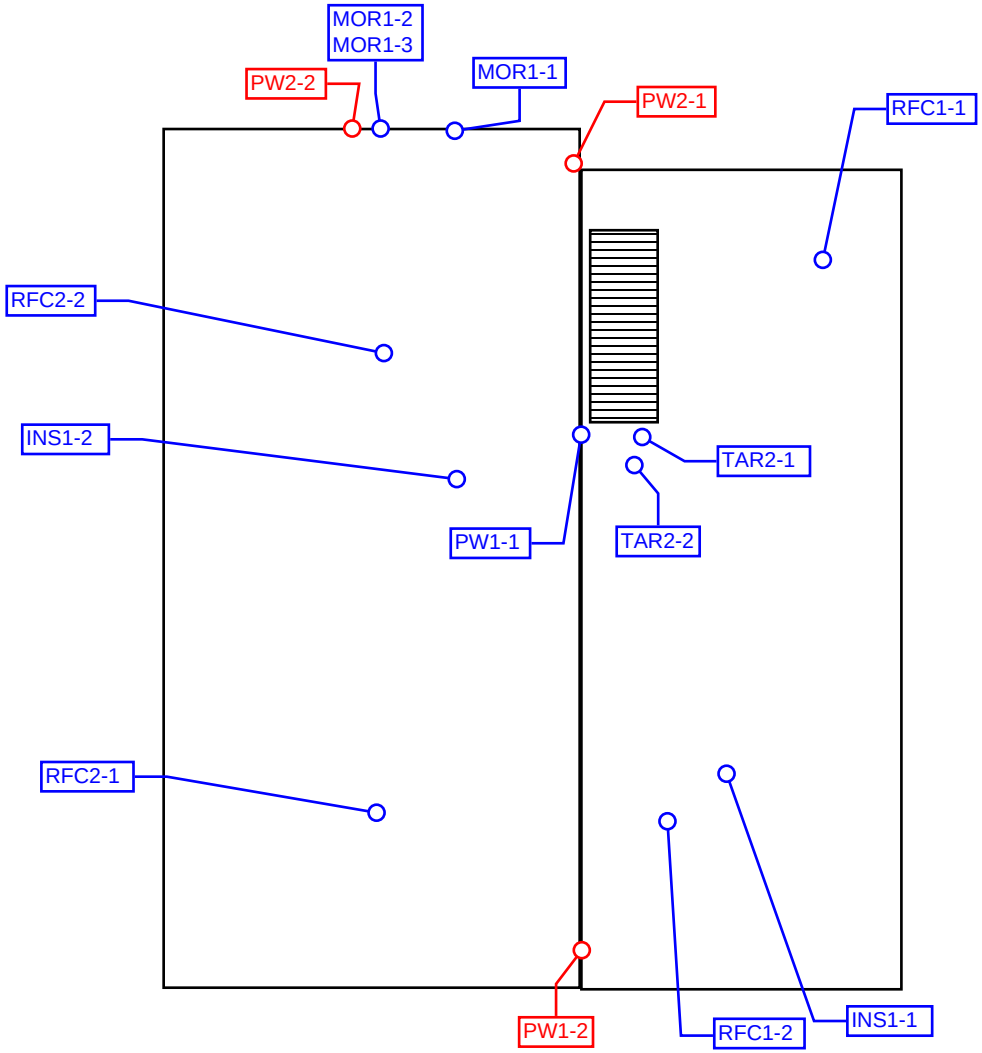
Non-detect Sample
Sample Containing Asbestos



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 3
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

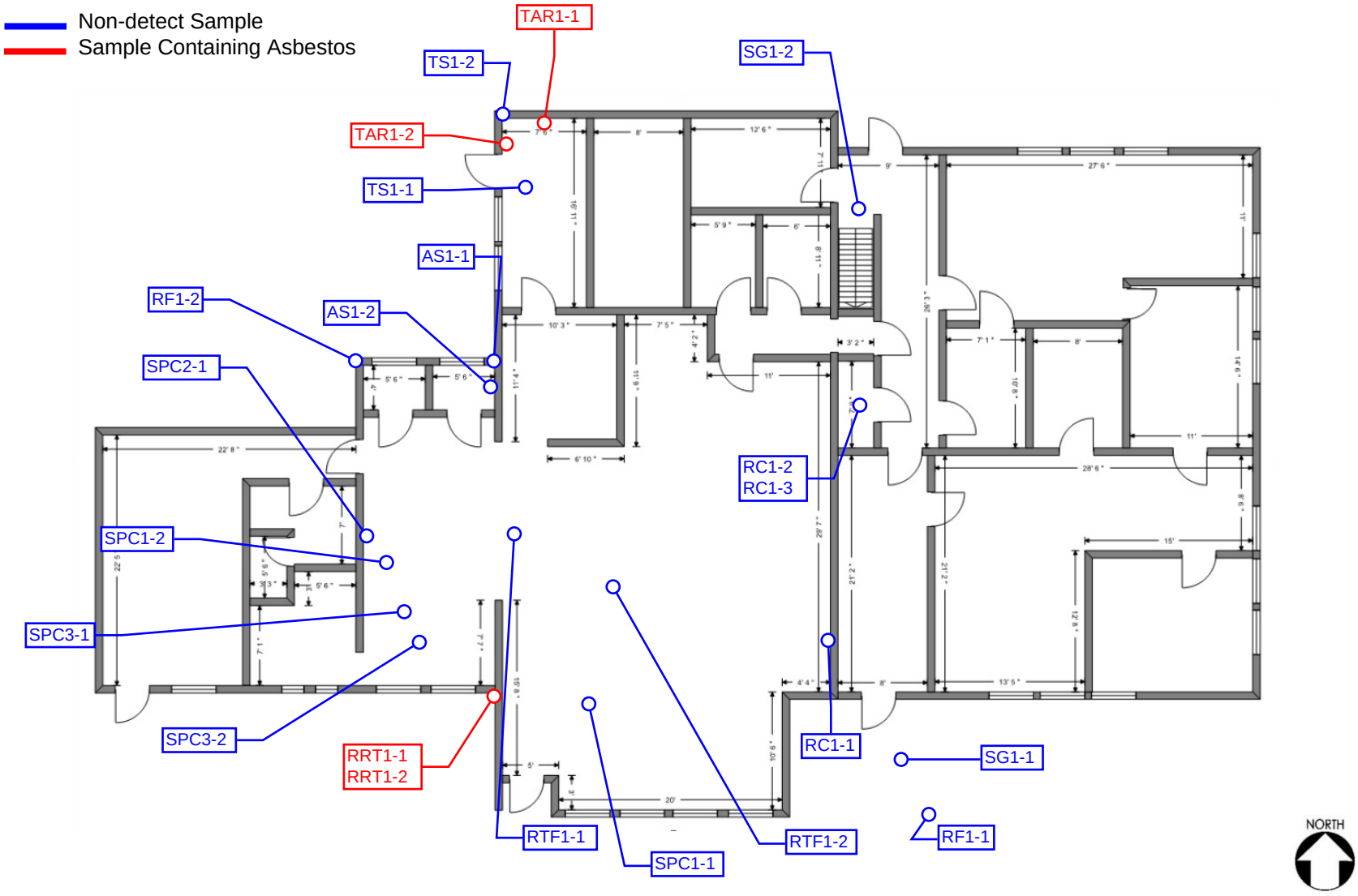
SAMPLE LOCATIONS DRAWING – ATTIC

Non-detect Sample
Sample Containing Asbestos



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 4
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

SAMPLE LOCATIONS DRAWING - ROOF



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 5
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

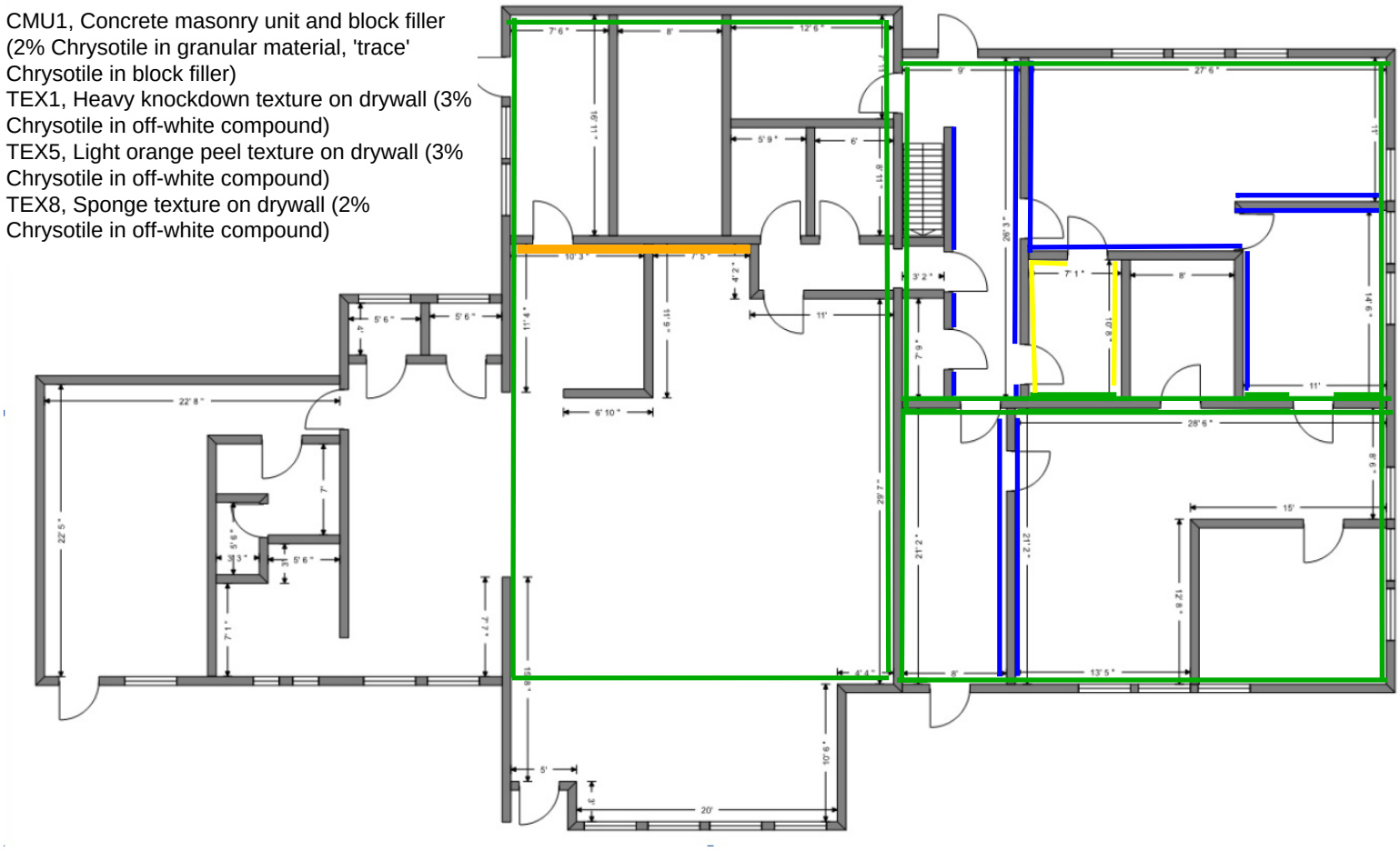
MATERIAL LOCATIONS DRAWING –FLOORS

- LC1, Leveling compound and brown tile (5-9% Chrysotile in brown tile)
- VFT3/VFT4, Red and Brown 9" x 9" Floor tile with black mastic (7-12% Chrysotile in floor tile, mastic was non-detect)
- VFT5, Tan 9" x 9" Floor tile with black mastic (12% Chrysotile in floor tile, mastic was non-detect)

Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 6
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

MATERIAL LOCATIONS DRAWING – WALLS

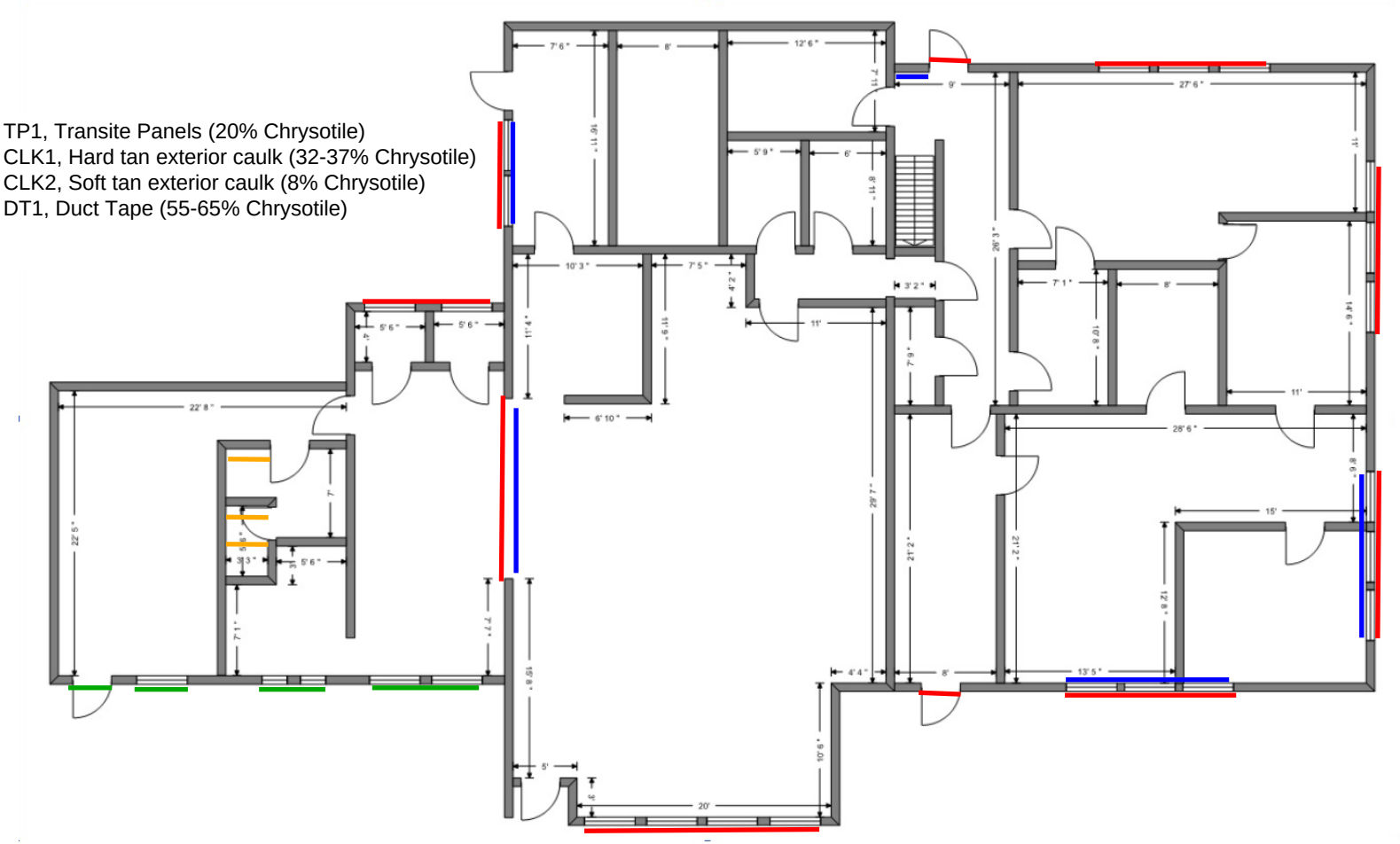
- CMU1, Concrete masonry unit and block filler (2% Chrysotile in granular material, 'trace' Chrysotile in block filler)
- TEX1, Heavy knockdown texture on drywall (3% Chrysotile in off-white compound)
- TEX5, Light orange peel texture on drywall (3% Chrysotile in off-white compound)
- TEX8, Sponge texture on drywall (2% Chrysotile in off-white compound)



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 7
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

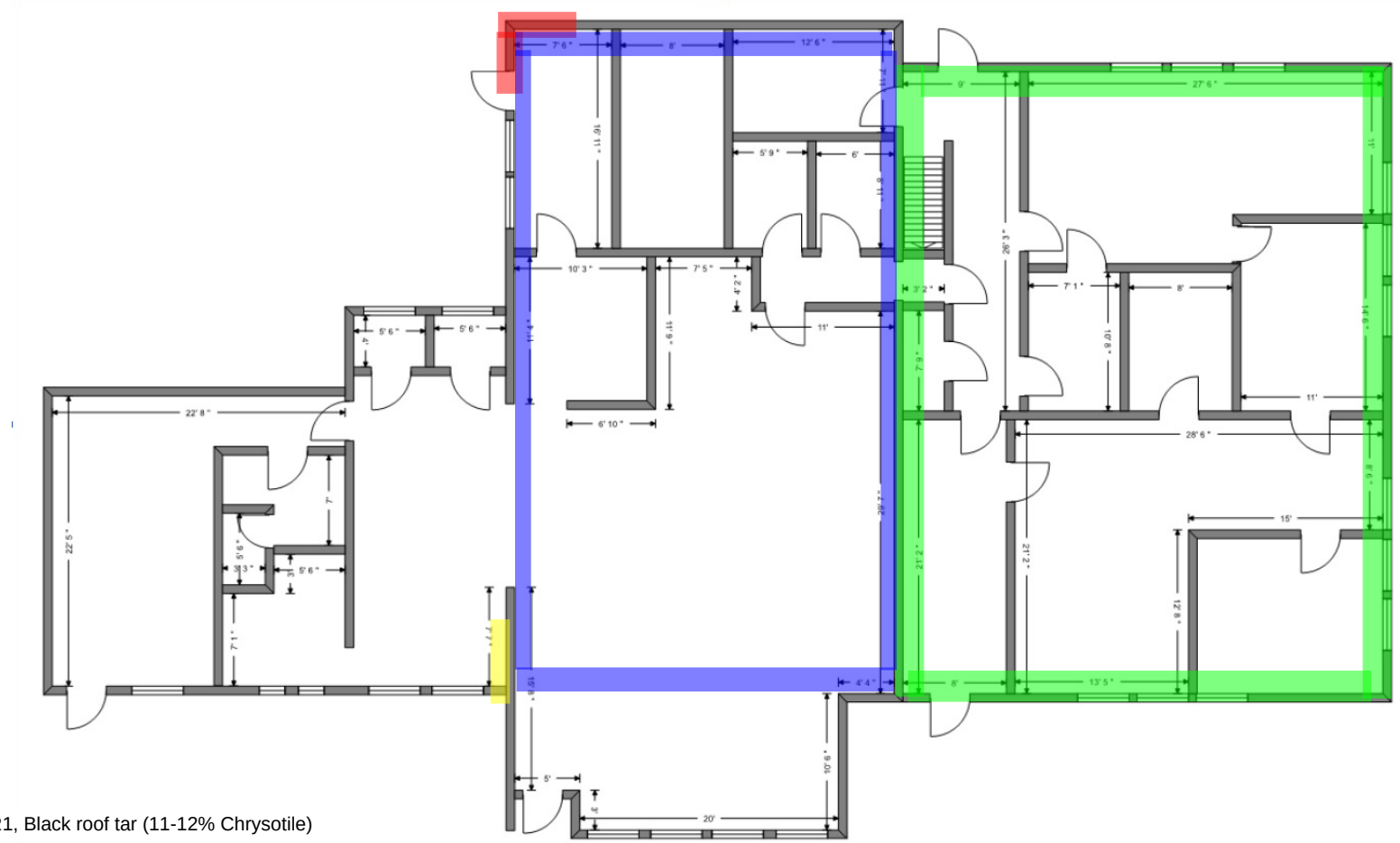
MATERIAL LOCATIONS DRAWING – EXTERIOR/MISC.

- TP1, Transite Panels (20% Chrysotile)
- CLK1, Hard tan exterior caulk (32-37% Chrysotile)
- CLK2, Soft tan exterior caulk (8% Chrysotile)
- DT1, Duct Tape (55-65% Chrysotile)



Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 8
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

MATERIAL LOCATIONS DRAWING – ROOF



TAR1, Black roof tar (11-12% Chrysotile)
RRT1, Rolled asphaltic roof flashing (4-6% Chrysotile)
PW1, Black roof tar (11-12% Chrysotile)
PW1, Rolled asphaltic roof flashing (4-6% Chrysotile)

NORTH

Dolores Town Hall 420 Central Avenue Dolores, CO 81323 (Drawing not to scale)	FEI Project #AS23127	Date: 9/26/2023	Figure 9
	Approved by: DB	Drawn By: HW	
	Foothills Environmental, Inc. 11099 W 8th Avenue Lakewood, CO 80215		

Appendix B

Laboratory Results

eurofins | Built Environment Testing Reservoirs

September 22, 2023

Subcontractor Number:
Laboratory Report: **RES 577588-1**
Project #/P.O. #: **AS23127**
Project Description: **Dolores Town Hall**

Haden Wilde
Foothills Environmental, Inc.
11099 W. 8th Avenue
Lakewood CO 80215

Dear Haden,

Eurofins Reservoirs is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code 101896-0 for Transmission Electron Microscopy (TEM) and Polarized Light Microscopy (PLM) analysis and the American Industrial Hygiene Association (AIHA LAP, LLC), Lab ID 101533 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Eurofins Reservoirs has analyzed the following samples for asbestos content as per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the attached analysis table. The results have been submitted to your office.

RES 577588-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Eurofins Reservoirs will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed, as received and with the information provided by the customer. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Eurofins Reservoirs. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely,

Jeanne Spencer
by Tyler Hutchinson

Jeanne Spencer
President

DATA QA
09/22/2023

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 577588-1**
Client: **Foothills Environmental, Inc.**
Client Project/P.O.: **AS23127**
Client Project Description: **Dolores Town Hall**
Date Samples Received: **September 15, 2023**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Standard**
Date Samples Analyzed: **September 22, 2023**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - CLK1-1	A	Off white caulk	100	Chrysotile	37	0	63
577588 - CLK1-2	A	Off white caulk	100	Chrysotile	32	0	68
577588 - CLK2-1	A	Off white caulk	100	Chrysotile	8	0	92
577588 - CLK2-2	A	Tan caulk	100		ND	0	100
577588 - CLK3-1	A	White caulk	100		ND	0	100
577588 - CLK3-2	A	White caulk	100		ND	0	100
577588 - SG1-1	A	Black resinous material	100		ND	0	100
577588 - SG1-2	A	Black resinous material	100		ND	0	100
577588 - RF1-1	A	Brown felt	100		ND	70	30
577588 - RF1-2	A	Brown felt	100		ND	70	30
577588 - SPC1-1	A	White resinous material	100		ND	10	90
577588 - SPC1-2	A	White resinous material	100		ND	8	92
577588 - SPC2-1	A	Gray resinous material	100		ND	0	100
577588 - SPC2-2	A	Gray resinous material	100		ND	0	100
577588 - SPC3-1	A	Gray resinous material	100		ND	0	100
577588 - SPC3-2	A	Gray resinous material	100		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - RC1-1	A	Brownish-pink resinous material	100		ND	0	100
577588 - RC1-2	A	Brownish-pink resinous material	100		ND	0	100
577588 - RC1-3	A	Brownish-pink resinous material	100		ND	0	100
577588 - RRT1-1	A	Brown/gray paint	10	Chrysotile	4	0	96
	B	Black granular tar	25		ND	0	100
	C	Black fibrous tar	65		ND	70	30
577588 - RRT1-2	A	Brown/gray paint	15	Chrysotile	4	0	96
	B	Black tar	20	Chrysotile	6	0	94
	C	Gray/black granular tar	25		ND	0	100
	D	Black fibrous tar	40		ND	70	30
577588 - RTF1-1	A	Black resinous material	100		ND	15	85
577588 - RTF1-2	A	Black resinous material	100		ND	15	85
577588 - TAR1-1	A	Black tar	100	Chrysotile	11	0	89
577588 - TAR1-2	A	Black tar	100	Chrysotile	12	0	88
577588 - TS1-1	A	Reddish-brown granular material	100		ND	0	100
577588 - TS1-2	A	Reddish-brown granular material	100		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - AS1-1	A	Green/black shingle	100		ND	20	80
577588 - AS1-2	A	Green/black shingle	100		ND	20	80
577588 - BM1-1	A	Reddish-brown mortar	20		ND	0	100
	B	Red brick	80		ND	0	100
577588 - BM1-2	A	Reddish-brown paint	35		ND	0	100
	B	Red brick w/ white/multi-colored paint	65		ND	0	100
577588 - FS1-1	A	Black resinous material	100		ND	10	90
577588 - FS1-2	A	Black resinous material	100		ND	10	90
577588 - CF1-1	A	Gray granular cementitious material	100		ND	0	100
577588 - CF1-2	A	Gray granular cementitious material	100		ND	0	100
577588 - VD1-1	A	Colorless resinous material	45		ND	0	100
	B	Gray resinous material w/ colorless fibrous woven material	55		ND	15	85
577588 - VD1-2	A	Colorless resinous material	30		ND	0	100
	B	Gray resinous material w/ colorless fibrous woven material	70		ND	12	88
577588 - VD2-1	A	Black resinous material w/ colorless fibrous woven material	100		ND	10	90

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - VD2-2	A	Black resinous material w/ colorless fibrous woven material	100		ND	10	90
577588 - VD2-3	A	Black resinous material w/ colorless fibrous woven material	100		ND	20	80
577588 - CA1-1	A	Yellow adhesive	5		ND	0	100
	B	Brown/multi-colored carpet	95		ND	65	35
577588 - CA1-2	A	Yellow adhesive	2		ND	0	100
	B	Brown/multi-colored carpet	98		ND	65	35
577588 - CA2-1	A	Yellow adhesive	TR		ND	0	100
	B	Brown/tan carpet	100		ND	65	35
577588 - CA2-2	A	Yellow adhesive	5		ND	0	100
	B	Brown/tan carpet	95		ND	65	35
577588 - CA3-1	A	Off white adhesive	8		ND	0	100
	B	Black/gray carpet	92		ND	75	25

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - CA3-2	A	Black mastic	2		ND	0	100
	B	Off white adhesive	3		ND	0	100
	C	Black/gray carpet	95		ND	75	25
577588 - VFT1-1	A	Black mastic	4		ND	0	100
	B	Orange adhesive	6		ND	0	100
	C	Beige/multi-colored floor tile	90		ND	3	97
577588 - VFT1-2	A	Orange adhesive	2		ND	0	100
	B	Black mastic	3		ND	0	100
	C	Beige/multi-colored floor tile	95		ND	3	97
577588 - VFT2-1	A	Orange adhesive	3		ND	0	100
	B	Black mastic	5		ND	0	100
	C	Beige/multi-colored floor tile	92		ND	3	97
577588 - VFT2-2	A	Orange adhesive	2		ND	0	100
	B	Black mastic	2		ND	0	100
	C	Beige/multi-colored floor tile	96		ND	3	97

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - VFT3-1	A	Black mastic	3		ND	0	100
	B	Yellow adhesive	3		ND	0	100
	C	Red/white floor tile	94	Chrysotile	7	0	93
577588 - VFT3-2	A	Yellow adhesive	2		ND	0	100
	B	Black mastic	3		ND	0	100
	C	Red/white floor tile	95	Chrysotile	7	0	93
577588 - VFT4-1	A	Black mastic	2		ND	0	100
	B	Yellow adhesive	3		ND	0	100
	C	Tan/brown floor tile	95	Chrysotile	12	0	88
577588 - VFT4-2	A	Black mastic	1		ND	0	100
	B	Yellow adhesive	3		ND	0	100
	C	Tan/brown floor tile	96	Chrysotile	12	0	88
577588 - LC1-1	A	Black mastic	TR		ND	0	100
	B	Yellow adhesive	8		ND	0	100
	C	Brown tile	20	Chrysotile	9	0	91
	D	Gray granular material	72		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - LC1-2	A	Black mastic	2		ND	0	100
	B	Brown tile	3	Chrysotile	5	0	95
	C	Yellow adhesive	10		ND	0	100
	D	Gray granular material	85		ND	0	100
577588 - LC2-1	A	Yellow adhesive	25		ND	0	100
	B	Gray granular material	30		ND	0	100
	C	White compound	45		ND	0	100
577588 - LC2-2	A	Yellow adhesive	30		ND	0	100
	B	White compound w/ brown debris	70		ND	0	100
577588 - VFT5-1	A	Black mastic	2		ND	0	100
	B	Tan/brown floor tile	98	Chrysotile	12	0	88
577588 - VFT5-2	A	Black mastic	3		ND	0	100
	B	Tan/brown floor tile	97	Chrysotile	12	0	88
577588 - VFT5-3	A	Black mastic	2		ND	0	100
	B	Tan/brown floor tile	98	Chrysotile	12	0	88

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 577588-1**
Client: **Foothills Environmental, Inc.**
Client Project/P.O.: **AS23127**
Client Project Description: **Dolores Town Hall**
Date Samples Received: **September 15, 2023**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Standard**
Date Samples Analyzed: **September 22, 2023**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - CBM1-1	A	Brown adhesive w/ white paint	5		ND	2	98
	B	Yellow adhesive	7		ND	0	100
	C	Gray cove base	88		ND	0	100
577588 - CBM1-2	A	Brown adhesive	5		ND	0	100
	B	Black cove base	95		ND	0	100
577588 - CBM2-1	A	Yellow adhesive	20		ND	0	100
	B	Beige cove base	80		ND	0	100
577588 - CBM2-2	A	Brown adhesive w/ white paint	2		ND	0	100
	B	Yellow adhesive	8		ND	0	100
	C	Beige cove base	90		ND	0	100
577588 - CMU1-1	A	Off white granular material	10	Chrysotile	2	0	98
	B	White granular material	15		ND	0	100
	C	Gray granular material	20		ND	0	100
	D	White compound w/ light yellow paint	55		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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577588 - CMU1-2	A	Gray granular material	50		ND	0	100
	B	Off white granular material w/ light yellow paint	50	Chrysotile	2	0	98
577588 - CMU1-3	A	Off white block filler	10	Chrysotile	TR	0	100
	B	Green/multi-colored paint	20		ND	0	100
	C	Gray granular cementitious material	25		ND	0	100
	D	Gray cinder block	45		ND	0	100
577588 - CMU1-4	A	Off white block filler	10	Chrysotile	TR	0	100
	B	White/multi-colored paint	10		ND	0	100
	C	Gray cinder block	80		ND	0	100
577588 - CMU1-5	A	Gray granular cementitious material	5		ND	0	100
	B	Off white compound	15	Chrysotile	TR	0	100
	C	White/multi-colored paint	35		ND	0	100
	D	Gray cinder block	45		ND	0	100

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577588 - CMU1-6	A	Off white block filler	10	Chrysotile	TR	0	100
	B	Green/multi-colored paint	15		ND	0	100
	C	Gray cinder block	75		ND	0	100
577588 - CMU1-7	A	Off white block filler	15	Chrysotile	TR	0	100
	B	Beige/multi-colored paint	20		ND	0	100
	C	Gray cinder block	65		ND	0	100
577588 - CMU1-8	A	Off white block filler	15	Chrysotile	TR	0	100
	B	Beige/multi-colored paint	25		ND	0	100
	C	Gray cinder block	60		ND	0	100
577588 - CMU1-9	A	Off white block filler	10	Chrysotile	TR	0	100
	B	Beige/multi-colored paint	10		ND	0	100
	C	Gray cinder block	40		ND	0	100
	D	Gray granular cementitious material	40		ND	0	100

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577588 - CMU2-1	A	Gray cinder brick	20		ND	0	100
	B	Gray granular cementitious material	40		ND	0	100
	C	Beige/multi-colored paint	40		ND	0	100
577588 - CMU2-2	A	Gray cinder brick w/ tan/multi-colored paint	100		ND	0	100
577588 - CMU2-3	A	Gray cinder block w/ tan paint	100		ND	0	100
577588 - BM2-1	A	Red brick w/ white/multi-colored paint	100		ND	0	100
577588 - BM2-2	A	Red mortar	20		ND	0	100
	B	Red brick w/ white/multi-colored paint	80		ND	0	100
577588 - BM2-3	A	Red brick w/ beige/multi-colored paint	15		ND	0	100
	B	Red mortar	85		ND	0	100
577588 - BM2-4	A	Red brick w/ white/multi-colored paint	15		ND	0	100
	B	Gray mortar	35		ND	0	100
	C	Red mortar	50		ND	0	100
577588 - TEX1-1	A	White compound	3		ND	0	100
	B	White compound w/ white paint	97		ND	0	100

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577588 - TEX1-2	A	Off white compound	1	Chrysotile	3	0	97
	B	White texture w/ white paint	99		ND	0	100
577588 - TEX1-3	A	Off white compound w/ yellow paint	6	Chrysotile	6	0	94
	B	White compound w/ white paint	15		ND	0	100
	C	White/tan drywall	79		ND	20	80
577588 - TEX1-4	A	White compound w/ white paint	100		ND	0	100
577588 - TEX1-5	A	White compound w/ green/beige paint	15		ND	0	100
	B	White compound w/ light pink paint	20		ND	0	100
	C	White/tan drywall	65		ND	30	70
577588 - TEX2-1	A	Gray/tan drywall w/ white paint	100		ND	20	80
577588 - TEX2-2	A	Gray/tan drywall w/ white paint	100		ND	20	80
577588 - TEX2-3	A	Tan/gray drywall w/ white paint	100		ND	50	50
577588 - TEX3-1	A	Tan/white drywall	20		ND	0	100
	B	White compound w/ white paint	80		ND	0	100
577588 - TEX3-2	A	White compound w/ white paint	30		ND	0	100
	B	White/tan drywall	70		ND	30	70

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577588 - TEX3-3	A	White compound w/ white paint	30		ND	0	100
	B	White/tan drywall	70		ND	40	60
577588 - TEX4-1	A	White compound w/ light yellow paint	6		ND	0	100
	B	Gray/tan drywall	94		ND	35	65
577588 - TEX4-2	A	White compound w/ light yellow paint	6		ND	0	100
	B	Gray/tan drywall	94		ND	20	80
577588 - TEX4-3	A	White joint compound	5		ND	0	100
	B	White compound w/ light yellow paint	6		ND	0	100
	C	White tape	10		ND	95	5
	D	Gray/tan drywall	79		ND	20	80
577588 - TEX4-4	A	White compound w/ light yellow paint	100		ND	0	100
577588 - TEX4-5	A	White compound w/ light yellow paint	40		ND	0	100
	B	Gray/tan drywall	60		ND	5	95
577588 - TEX5-1	A	White texture w/ cream paint	15		ND	0	100
	B	Tan paper w/ white/multi-colored paint	85		ND	70	30

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577588 - TEX5-2	A	White texture w/ cream paint	9		ND	0	100
	B	Tan/white drywall w/ white/multi-colored paint	91		ND	65	35
577588 - TEX5-3	A	Off white/multi-colored paint	5		ND	0	100
	B	Off white texture w/ off white paint	5		ND	0	100
	C	White texture w/ white paint	13		ND	0	100
	D	Off white compound	16	Chrysotile	3	0	97
	E	Tan/white drywall	61		ND	80	20
577588 - TEX5-4	A	White texture w/ off white paint	5		ND	0	100
	B	Off white/multi-colored paint	6		ND	0	100
	C	White texture w/ white paint	11		ND	0	100
	D	Off white compound	15	Chrysotile	3	0	97
	E	Tan/white drywall	63		ND	75	25
577588 - TEX6-1	A	White texture w/ cream paint	10		ND	0	100
	B	White texture w/ cream paint	90		ND	0	100
577588 - TEX6-2	A	White texture w/ white/cream paint	100		ND	0	100

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577588 - TEX6-3	A	White texture w/ white/cream paint	30		ND	0	100
	B	Tan/off white drywall	70		ND	75	25
577588 - TEX7-1	A	Off white plaster w/ cream/multi-colored paint	100		ND	0	100
577588 - TEX7-2	A	Gray cementitious material w/ cream/white paint	25		ND	0	100
	B	Off white plaster w/ off white/white paint	75		ND	0	100
577588 - TEX7-3	A	Gray cementitious material w/ cream/white paint	100		ND	0	100
577588 - TEX8-1	A	White texture w/ cream paint	7		ND	0	100
	B	Tan/gray drywall	93		ND	70	30
577588 - TEX8-2	A	White texture w/ cream paint	10		ND	0	100
	B	Tan/gray drywall	90		ND	80	20
577588 - TEX8-3	A	Off white compound	1	Chrysotile	2	0	98
	B	Off white/multi-colored paint	7		ND	0	100
	C	White texture w/ cream paint	8		ND	0	100
	D	Tan/white drywall	84		ND	75	25
577588 - TEX9-1	A	White texture w/ beige/multi-colored paint	45		ND	0	100
	B	Beige/multi-colored paint	55		ND	0	100

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577588 - TEX9-2	A	White texture w/ beige paint	100		ND	0	100
577588 - TEX9-3	A	White texture w/ beige paint	2		ND	0	100
	B	White texture w/ beige paint	98		ND	0	100
577588 - TEX10-1	A	White texture w/ beige paint	35		ND	0	100
	B	Tan/white drywall	65		ND	55	45
577588 - TEX10-2	A	White texture w/ beige paint	15		ND	0	100
	B	White/tan drywall	85		ND	20	80
577588 - TEX10-3	A	White texture w/ beige paint	25		ND	0	100
	B	White/tan drywall w/ beige/tan paint	75		ND	20	80
577588 - TEX11-1	A	White texture w/ beige paint	100		ND	0	100
577588 - TEX11-2	A	Gray granular plaster	20		ND	0	100
	B	White texture w/ beige paint	80		ND	0	100
577588 - TEX11-3	A	Gray granular plaster w/ beige paint	100		ND	0	100
577588 - TEX11-4	A	Gray granular plaster w/ beige paint	100		ND	0	100
577588 - TEX12-1	A	White texture w/ beige paint	35		ND	0	100
	B	White/tan drywall	65		ND	40	60

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577588 - TEX12-2	A	White texture w/ white paint	15		ND	0	100
	B	White/tan drywall	85		ND	15	85
577588 - TEX12-3	A	Tan/white drywall	40		ND	0	100
	B	White texture w/ tan paint	60		ND	0	100
577588 - TEX13-1	A	White texture w/ tan paint	25		ND	0	100
	B	Gray/tan drywall	75		ND	25	75
577588 - TEX13-2	A	White texture w/ tan paint	50		ND	0	100
	B	Gray/tan drywall	50		ND	35	65
577588 - TEX13-3	A	White texture w/ tan paint	40		ND	0	100
	B	Gray/tan drywall	60		ND	25	75
577588 - RFC1-1	A	Black felt w/ black tar	3		ND	65	35
	B	Black/gray granular tar	17		ND	0	100
	C	Tan fiberboard	40		ND	90	10
	D	Black multi-layered felt w/ black multi-layered tar	40		ND	40	60

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577588 - RFC1-2	A	Black felt w/ black tar	7		ND	65	35
	B	Black tar w/ brown granular debris	15		ND	0	100
	C	Black multi-layered felt w/ black multi-layered tar	25		ND	45	55
	D	Brown fiberboard	53		ND	90	10
577588 - RFC2-1	A	Black felt w/ black tar	6		ND	65	35
	B	Black granular tar	15		ND	0	100
	C	Black multi-layered felt w/ black multi-layered tar	35		ND	50	50
	D	Tan fiberboard	44		ND	90	10
577588 - RFC2-2	A	Black felt w/ black tar	9		ND	65	35
	B	Black multi-layered felt w/ black multi-layered tar	45		ND	50	50
	C	Tan fiberboard	46		ND	90	10
577588 - DT1-1	A	Gray felt w/ white paint	100	Chrysotile	55	2	43
577588 - DT1-2	A	Gray felt w/ dark gray paint	100	Chrysotile	55	2	43
577588 - DT1-3	A	Gray felt	100	Chrysotile	65	3	32
577588 - INS1-1	A	Brown/multi-colored insulation	100		ND	90	10

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577588 - INS1-2	A	Brown/multi-colored insulation	100		ND	90	10
577588 - MOR1-1	A	Pink granular cementitious material	100		ND	TR	100
577588 - MOR1-2	A	Pink granular cementitious material	100		ND	TR	100
577588 - MOR1-3	A	Pink granular cementitious material	100		ND	TR	100
577588 - PW1-1	A	Black granular tar	20		ND	0	100
	B	Black multi-layered felt w/ black multi-layered tar	30		ND	45	55
	C	Black multi-layered felt w/ black multi-layered tar	35		ND	50	50
	D	Black tar w/ tan granular material	15		ND		100
577588 - PW1-2	A	Black multi-layered felt w/ black multi-layered tar	15		ND	45	55
	B	Black/gray granular tar	20		ND	0	100
	C	Black multi-layered felt w/ black multi-layered tar	20		ND	45	55
	D	Black fibrous tar	20	Chrysotile	18	0	82
	E	Black tar w/ tan granular material	25		ND	1	99

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ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - PW2-1	A	Colorless fibrous woven material	8		ND	90	10
	B	Black tar	12		ND	0	100
	C	Black/white fibrous granular tar	30		ND	25	75
	D	Black fibrous tar	50	Chrysotile	20	0	80
577588 - PW2-2	A	Black tar	15		ND	0	100
	B	Black fibrous tar	30	Chrysotile	15	0	85
	C	Black/white fibrous granular tar	55		ND	25	75
577588 - TAR2-1	A	Black fibrous tar	7		ND	15	85
	B	Black tar	93		ND	0	100
577588 - TAR2-2	A	Black tar	35		ND	0	100
	B	Black/brown granular tar	65		ND	0	100
577588 - TP1-1	A	Brown fibrous material	25		ND	95	5
	B	Tan fibrous cementitious material w/ off white/multi-colored paint	75	Chrysotile	20	0	80

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 577588-1**
Client: **Foothills Environmental, Inc.**
Client Project/P.O.: **AS23127**
Client Project Description: **Dolores Town Hall**
Date Samples Received: **September 15, 2023**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Standard**
Date Samples Analyzed: **September 22, 2023**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - TP1-2	A	Gray fibrous cementitious material w/ off white/multi-colored paint	25	Chrysotile	20	0	80
	B	Brown fibrous material	75		ND	95	5
577588 - LIP1-1	A	Gray/white ceiling tile	100		ND	55	45
577588 - LIP1-2	A	Gray/white ceiling tile	100		ND	55	45
577588 - LIP2-1	A	Gray/white ceiling tile	100		ND	60	40
577588 - LIP2-2	A	Gray/white ceiling tile	100		ND	55	45
577588 - CMU3-1	A	Gray granular cementitious material w/ white paint	100		ND	0	100
577588 - CMU3-2	A	Gray granular cementitious material w/ white paint	100		ND	0	100
577588 - WPA1-1	A	Grayish-tan adhesive	10		ND	0	100
	B	Tan wood	90		ND	80	20
577588 - WPA1-2	A	Grayish-tan adhesive	5		ND	0	100
	B	Tan wood	95		ND	80	20

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - DWJC1-1	A	White tape	7		ND	95	5
	B	White joint compound	12		ND	0	100
	C	White compound w/ white paint	16		ND	0	100
	D	Pink/tan drywall	65		ND	30	70
577588 - DWJC1-2	A	White texture w/ white paint	15		ND	0	100
	B	Pink/tan drywall w/ white/multi-colored paint	85		ND	15	85
577588 - DWJC2-1	A	White tape	4		ND	95	5
	B	White joint compound	5		ND	0	100
	C	White compound w/ white paint	6		ND	0	100
	D	Pink/tan drywall	85		ND	17	83
577588 - DWJC2-2	A	White tape	5		ND	95	5
	B	White joint compound	6		ND	0	100
	C	White compound w/ white paint	9		ND	0	100
	D	Pink/tan drywall	80		ND	20	80

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

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AIHA LAP, LLC. LAB ID 101533

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TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - DWJC3-1	A	White tape	5		ND	95	5
	B	White joint compound	7		ND	0	100
	C	White compound w/ beige/multi-colored paint	8		ND	0	100
	D	Off white/tan drywall	80		ND	17	83
577588 - DWJC3-2	A	White tape	4		ND	95	5
	B	White compound w/ white/multi-colored paint	5		ND	0	100
	C	White joint compound	11		ND	0	100
	D	Off white/tan drywall	80		ND	15	85
577588 - DWJC3-3	A	White tape	4		ND	95	5
	B	White joint compound	5		ND	0	100
	C	White compound w/ white/multi-colored paint	6		ND	0	100
	D	Off white/tan drywall	85		ND	17	83

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - DWJC4-1	A	Off white tape	8		ND	90	10
	B	White joint compound	10		ND	0	100
	C	White texture w/ white paint	17		ND	0	100
	D	Gray/tan drywall	65		ND	15	85
577588 - DWJC4-2	A	Off white tape	10		ND	90	10
	B	White joint compound	15		ND	0	100
	C	White compound w/ white/multi-colored paint	30		ND	0	100
	D	Yellow/silver drywall	45		ND	25	75
577588 - DWJC5-1	A	Off white tape	5		ND	90	10
	B	White joint compound	5		ND	0	100
	C	White texture w/ beige/multi-colored paint	8		ND	0	100
	D	Gray/tan drywall	82		ND	12	88

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - DWJC5-2	A	Off white compound	1	Chrysotile	2	0	98
	B	Beige/multi-colored paint	5		ND	0	100
	C	White texture w/ beige paint	5		ND	0	100
	D	White/tan drywall	89		ND	13	87
577588 - DWJC6-1	A	Cream/multi-colored paint w/ white compound	3		ND	0	100
	B	White/tan drywall	97		ND	15	85
577588 - DWJC6-2	A	Off white tape	3		ND	90	10
	B	White joint compound	5		ND	0	100
	C	White texture w/ cream paint	7		ND	0	100
	D	White/tan drywall	85		ND	15	85
577588 - DWJC7-1	A	White texture w/ tan paint	10		ND	0	100
	B	Gray/tan drywall	90		ND	10	90
577588 - DWJC7-2	A	White texture w/ tan paint	5		ND	0	100
	B	Gray/tan drywall	95		ND	15	85
577588 - PC1-1	A	Gray granular material	100		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

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Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
577588 - PC1-2	A	Gray granular material	100		ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

Andrew Roberts
Analyst

Josh E. Baker
Analyst

Tyler Hutchinson
Analyst

Elizabeth Schaeffer
Analyst

Christina Tiggemann
Analyst

Appendix C

Photographs

Sample: CLK1-1
Result: 37% Chrysotile

Sample: CLK2-2
Result: None Detected

Sample: CLK1-2
Result: 32% Chrysotile

Sample: CLK3-1
Result: None Detected

Sample: CLK2-1
Result: 8% Chrysotile

Sample: CLK3-2
Result: None Detected

Sample: SG1-1
Result: None Detected

Sample: RF1-2
Result: None Detected

Sample: SG1-2
Result: None Detected

Sample: RRT1-1
Result: 4% Chrysotile

Sample: RF1-1
Result: None Detected

Sample: RRT1-2
Result: 4% Chrysotile in paint
6% Chrysotile in tar


Sample: SPC1-1
Result: None Detected

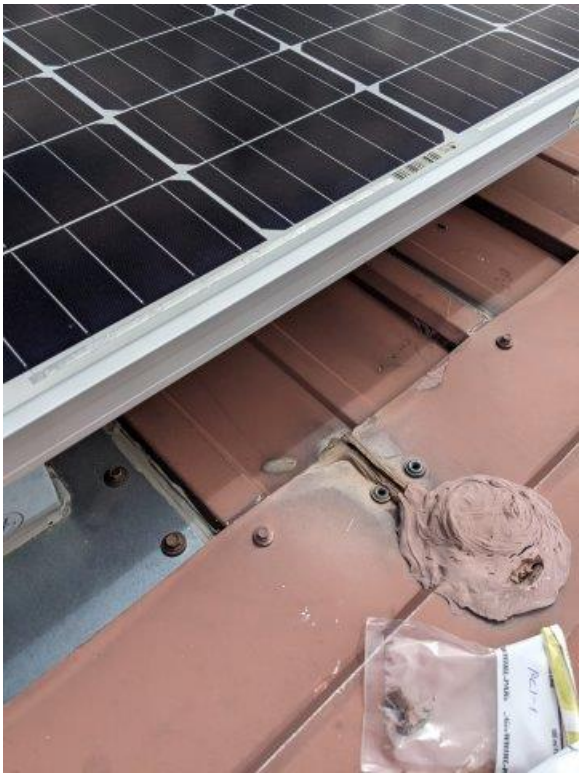

Sample: SPC2-2
Result: None Detected


Sample: SPC1-2
Result: None Detected


Sample: SPC3-1
Result: None Detected


Sample: SPC2-1
Result: None Detected


Sample: SPC3-2
Result: None Detected



Sample: RC1-1
Result: None Detected

Sample: RC1-3
Result: None Detected

Sample: RC1-2
Result: None Detected


Sample: RTF1-1
Result: None Detected

Sample: RTF1-2
Result: None Detected

Sample: TS1-1
Result: None Detected

Sample: TAR1-1
Result: 11% Chrysotile

Sample: TS1-2
Result: None Detected

Sample: TAR1-2
Result: 12% Chrysotile

Sample: AS1-1/2
Result: None Detected


Sample: BM1-1
Result: None Detected


Sample: FS1-2
Result: None Detected


Sample: BM1-2
Result: None Detected


Sample: CF1-1
Result: None Detected


Sample: FS1-1
Result: None Detected


Sample: CF1-2
Result: None Detected

Sample: VD1-1
Result: None Detected

Sample: VD2-2/3
Result: None Detected


Sample: VD1-2
Result: None Detected

Sample: CA1-1
Result: None Detected


Sample: VD2-1
Result: None Detected

Sample: CA1-2
Result: None Detected

Sample: CA2-1
Result: None Detected

Sample: CA3-2
Result: None Detected

Sample: CA2-2
Result: None Detected

Sample: VFT1-1
Result: None Detected

Sample: CA3-1
Result: None Detected

Sample: VFT1-2
Result: None Detected

Sample: VFT2-1
Result: None Detected

Sample: VFT3-2
Result: 7% Chrysotile in floor tile
Mastic was non-detect

Sample: VFT2-2
Result: None Detected

Sample: VFT4-1
Result: 12% Chrysotile in floor tile
Mastic was non-detect

Sample: VFT3-1
Result: 7% Chrysotile in floor tile
Mastic was non-detect

Sample: VFT4-1
Result: 12% Chrysotile in floor tile
Mastic was non-detect

Sample: LC1-1
Result: 9% Chrysotile in floor tile
Leveling compound was non-detect

Sample: LC2-2
Result: None Detected

Sample: LC1-2
Result: 5% Chrysotile in floor tile
Leveling compound was non-detect

Sample: VFT5-1
Result: 12% Chrysotile in floor tile
Mastic was non-detect

Sample: LC2-1
Result: None Detected

Sample: VFT5-2/3
Result: 12% Chrysotile in floor tile
Mastic was non-detect

Sample: CBM1-1
Result: None Detected

Sample: CBM2-2
Result: None Detected

Sample: CBM1-2
Result: None Detected

Sample: CMU1-1
Result: 2% Chrysotile in granular material

Sample: CBM2-1
Result: None Detected

Sample: CMU1-2
Result: 2% Chrysotile in granular material

Sample: CMU1-3
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-6
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-4
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-7
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-5
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-8
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU1-9
Result: ‘Trace’ Chrysotile in block filler

Sample: CMU2-3
Result: None Detected

Sample: CMU2-1
Result: None Detected

Sample: BM2-1
Result: None Detected

Sample: CMU2-2
Result: None Detected

Sample: BM2-2
Result: None Detected

Sample: BM2-3/4
Result: None Detected


Sample: TEX1-3
Result: 3% Chrysotile in off-white compound
Texture was non-detect

Sample: TEX1-1
Result: None Detected

Sample: TEX1-4
Result: None Detected


Sample: TEX1-2
Result: 3% Chrysotile in off-white compound
Texture was non-detect


Sample: TEX1-5
Result: None Detected

Sample: TEX2-1
Result: None Detected

Sample: TEX3-1
Result: None Detected

Sample: TEX2-2
Result: None Detected

Sample: TEX3-2
Result: None Detected

Sample: TEX2-3
Result: None Detected

Sample: TEX3-3
Result: None Detected

Sample: TEX4-1
Result: None Detected

Sample: TEX4-4
Result: None Detected

Sample: TEX4-2
Result: None Detected

Sample: TEX4-5
Result: None Detected

Sample: TEX4-3
Result: None Detected

Sample: TEX5-1
Result: None Detected

Sample: TEX5-2
Result: None Detected

Sample: TEX6-2
Result: None Detected

Sample: TEX5-3/4
Result: 3% Chrysotile in off-white compound
Texture was non-detect

Sample: TEX6-3
Result: None Detected

Sample: TEX6-1
Result: None Detected

Sample: TEX7-1
Result: None Detected

Sample: TEX7-2
Result: None Detected

Sample: TEX8-2
Result: None Detected

Sample: TEX7-3
Result: None Detected

Sample: TEX8-3
Result: 2% Chrysotile in off-white compound
Texture was non-detect

Sample: TEX8-1
Result: None Detected

Sample: TEX9-1
Result: None Detected


Sample: TEX9-2
Result: None Detected


Sample: TEX10-2
Result: None Detected


Sample: TEX9-3
Result: None Detected


Sample: TEX10-3
Result: None Detected


Sample: TEX10-1
Result: None Detected


Sample: TEX11-1
Result: None Detected

Sample: TEX11-2
Result: None Detected

Sample: TEX12-2
Result: None Detected

Sample: TEX11-3/4
Result: None Detected

Sample: TEX12-3
Result: None Detected

Sample: TEX12-1
Result: None Detected

Sample: TEX13-1
Result: None Detected

Sample: TEX13-2
Result: None Detected


Sample: RFC1-2
Result: None Detected

Sample: TEX13-3
Result: None Detected


Sample: RFC2-1
Result: None Detected

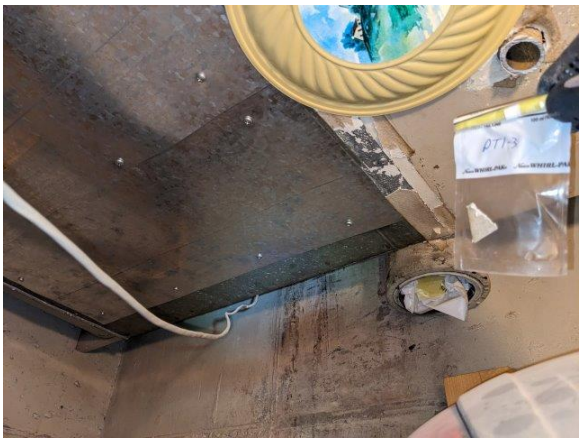

Sample: RFC1-1
Result: None Detected


Sample: RFC2-2
Result: None Detected

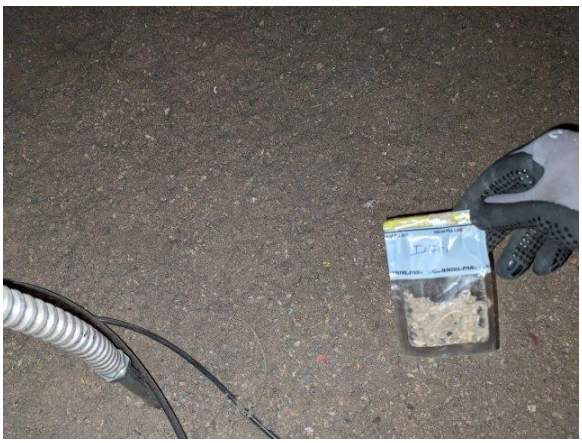

Sample: PW1-1
Result: None Detected

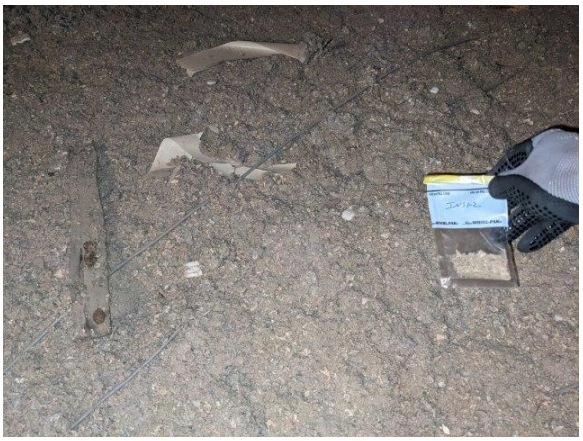

Sample: DT1-2
Result: 55% Chrysotile


Sample: PW1-2
Result: 18% Chrysotile in black fibrous tar

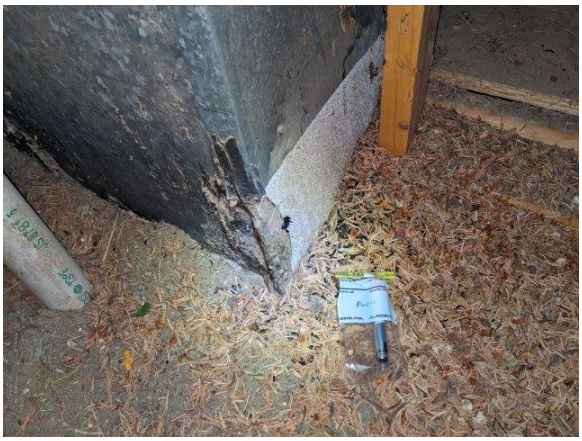

Sample: DT1-3
Result: 65% Chrysotile


Sample: DT1-1
Result: 55% Chrysotile


Sample: INS1-1
Result: None Detected



Sample: INS1-2
Result: None Detected

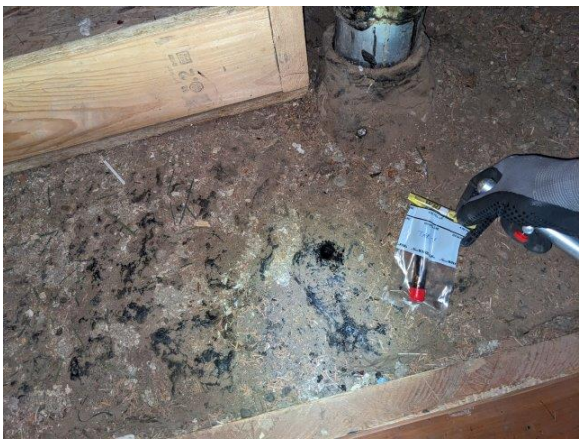


Sample: PW2-1
Result: 20% Chrysotile in black tar

Sample: MOR1-1
Result: None Detected

Sample: PW2-2
Result: 15% Chrysotile in black tar

Sample: MOR1-2/3
Result: None Detected



Sample: TAR2-1
Result: None Detected

Sample: TAR2-2
Result: None Detected

Sample: LIP1-1
Result: None Detected

Sample: TP1-1
Result: 20% Chrysotile

Sample: LIP1-2
Result: None Detected

Sample: TP1-2
Result: 20% Chrysotile

Sample: LIP2-1
Result: None Detected

Sample: LIP2-2
Result: None Detected

Sample: WPA1-1
Result: None Detected

Sample: CMU3-1
Result: None Detected

Sample: WPA1-2
Result: None Detected

Sample: CMU3-2
Result: None Detected

Sample: DWJC1-1
Result: None Detected

Sample: DWJC1-2
Result: None Detected

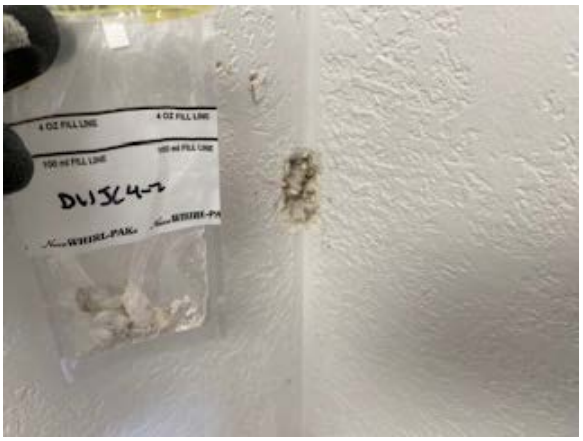

Sample: DWJC3-1
Result: None Detected

Sample: DWJC2-1
Result: None Detected

Sample: DWJC3-2/3
Result: None Detected

Sample: DWJC2-2
Result: None Detected


Sample: DWJC4-1
Result: None Detected



Sample: DWJC4-2
Result: None Detected

Sample: DWJC6-1
Result: None Detected

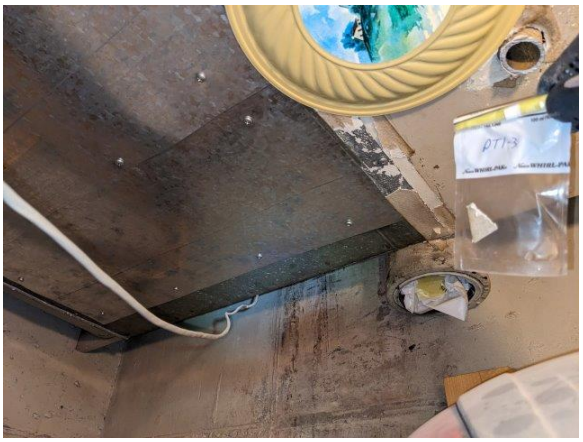
Sample: DWJC5-1
Result: None Detected

Sample: DWJC6-2
Result: None Detected

Sample: DWJC5-2
Result: 2% Chrysotile in off-white compound

Sample: DWJC7-1
Result: None Detected

Sample: DWJC7-2
Result: None Detected



Sample: PC1-1
Result: None Detected

Sample: PC1-2
Result: None Detected

Appendix D

Certifications

Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

Foothills Environmental, Inc.

Registration No.: ACF - 14925

has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued: March 03, 2023
Expires: March 10, 2024

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Jason Martin

Certification No.: 16218

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued: **February 17, 2023**

Expires: **February 28, 2024**

**** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.***

Authorized APCD Representative

SEAL

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Haden Wilde

Certification No.: 28726

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Inspector/Management Planner*

Issued: **April 03, 2023**

Expires: **April 03, 2024**

** This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.*

Authorized APCD Representative

SEAL