### HAZARDOUS MATERIALS SURVEY



LADREY SENIOR HIGHRISE APARTMENTS

300 WYTHE STREET ALEXANDRIA, VIRGINIA 22314

ECS PROJECT NO. 47:11427

FOR: ALEXANDRIA REDEVELOPMENT AND HOUSING AUTHORITY

FEBRUARY 4, 2021





"Setting the Standard for Service"

Geotechnical · Construction Materials · Environmental · Facilities

February 4, 2021

Mr. David Cortiella Alexandria Redevelopment and Housing Authority 401 Wythe Street Alexandria, Virginia 22314

ECS Project No. 47:11427

Reference: Hazardous Materials Survey, Ladrey Senior Highrise Apartments, 300 Wythe Street, Alexandria, Virginia

Dear Mr. Cortiella:

ECS Mid-Atlantic, LLC (ECS) is pleased to provide Alexandria Redevelopment and Housing Authority with the results of the above referenced Hazardous Materials Survey performed at Ladrey Senior Highrise Apartments located at 300 Wythe Street in Alexandria, Virginia. This report summarizes our observations, analytical results, findings, and recommendations related to the work performed. The work described in this report was performed by ECS in general accordance with the Scope of Services described in ECS Proposal Number 47:16885 and the terms and conditions of the agreement authorizing those services.

ECS appreciates this opportunity to provide Alexandria Redevelopment and Housing Authority with our services. If we can be of further assistance to you, please do not hesitate to contact us.

Sincerely,

ECS Mid-Atlantic, LLC

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#### **EXECUTIVE SUMMARY**

The subject property is improved with an 11-story, 170 unit apartment building reportedly constructed in 1968. At the time of our survey the subject building was occupied and is reportedly scheduled for renovations.

The purpose of the survey was to determine if asbestos-containing materials (ACMs), lead-based paints (LBPs), and universal wastes are present on the subject property. The survey was performed within interior and exterior areas of the subject building, excluding the roof. ECS observed that the roof insulation was encased in concrete at the time of the survey. Due to the construction of the roof, the client decided to postpone sampling the roof.

Based on the laboratory analysis of the bulk samples collected during the survey, the following materials were reported to contain asbestos:

- Tan Joint Compound
- Flooring materials and/or associated mastics

The lead-based paint survey was performed by a Commonwealth of Virginia licensed Lead Inspector. Painted and/or glazed surfaces were assessed for lead content using a Direct-Read X-Ray Fluorescence (XRF) Spectrometer. Lead-Based glazes were identified on the following building materials/components:

- Ceramic Tile Walls
- Custodial Sinks

According to OSHA, building materials with any detectable concentration of lead are considered "lead-containing". The components found to have lead-containing paints or coatings include the following:

- Metal Downspouts
- Metal Door Casings
- CMU Walls

In addition to survey for ACMs and LBPs, ECS surveyed the building for various materials classified as hazardous waste or universal waste which may require special handling or disposal if removed from the building which is referenced below:

- Various housekeeping chemicals
- Refrigerators and freezers
- Mercury-containing bulbs and assumed PCB-containing ballasts
- Lead-acid batteries
- Fire extinguishers

The executive summary is an integral portion of this report, however, ECS recommends the report be read in its entirety. Recommendations regarding the removal and disposal of the ACMs, LBPs, and hazardous/universal waste identified by ECS can be found in Section 5.0 of this report.



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### **1.0 SITE DESCRIPTION**

The subject property is improved with an 11-story, 170 unit apartment building reportedly constructed in 1968. The subject property consists of individual single bedroom or studio apartments each with a bathroom and a kitchen as well as office spaces, common areas such as the game room, laundry rooms on each floor, and central kitchen on the first floor. The subject property also has a boiler room. ECS surveyed accessible interior and exterior areas of the building including 10% of the units (17), common areas, office spaces, and the boiler room. The roofing insulation and membranes were inaccessible to ECS at the time of the survey due to encasement in concrete.

At the time of our survey the subject building was occupied and reportedly schedule for renovations.

### 2.0 PURPOSE

The purpose of the Hazardous Materials Survey was to identify asbestos-containing materials (ACMs), lead-based paint (LBP), universal waste and suspect liquid poly-chlorinated biphenyl (PCB) containing equipment in fixtures which may require special handling and/or disposal if removed during construction activities. The identification of ACMs may require trained labor, regulated work practices, and special disposal. The identification of LBP or other lead hazards may require disclosure to contractors and monitoring of lead exposure. The identification of other regulated materials such as universal waste may require personal protective equipment, training, special handling, packaging, and disposal.

### 3.0 METHODOLOGY

ECS performed the authorized Scope of Services in general accordance with our proposal, standard industry practice(s) and methods specified by regulation(s) for the identification of Asbestos-Containing Materials (ACMs), Lead-Based Paints (LBPs), and universal waste and suspect liquid PCB-containing equipment and fixtures.

#### 3.1 Asbestos-Containing Materials

The non-destructive asbestos survey was performed by asbestos inspectors who have received EPA accredited training and are licensed by the Commonwealth of Virginia. Samples of suspect ACMs were collected utilizing hand tools and placed into individual, labeled plastic bags. Unique bulk suspect ACM samples were submitted to Scientific Analysis Institute in Greensboro, North Carolina for analysis via Polarized Light Microscopy (PLM) in accordance with current EPA-600 methodology. Materials consisting of additional layers were analyzed separately. Scientific Analysis Institute is listed as an accredited laboratory by the National Voluntary Laboratory Accreditation Plan (NVLAP) managed by the National Institute of Standards and Technology (NIST) for bulk sample analysis by currently approved EPA methodology by PLM.

During the survey, ECS attempted to identify suspect ACMs in readily accessible areas. However, due to the destructive means required to identify some materials, certain areas were deemed inaccessible (i.e. behind walls or sub grade materials) and were not surveyed for suspect ACMs. The roof insulation and membranes were inaccessible at the time of the survey. Unidentified suspect ACMs may be located in these and/or other inaccessible areas.



Samples were collected in general accordance with EPA Standard 40 CFR 763 Subpart E, Asbestos Hazard Emergency Response Act (AHERA) and OSHA Standard 29 CFR 1926.1101 Inspection Protocol. Multiple samples of each unique material were submitted. Samples were analyzed using "Positive Stop" methodology. If one sample of a homogeneous material is reported to contain asbestos, the remaining samples of that material are not analyzed. EPA regulations stipulate that if one sample contains asbestos the entire quantity of that material contains asbestos, regardless of additional analysis.

### 3.2 Lead in Paint and Surface Coatings

The Lead-Based Paint (LBP) survey was performed by a Commonwealth of Virginia licensed Lead Inspector using a X-Ray Fluorescence (XRF) Spectrometer to identify lead concentrations in painted and glazed surfaces.

The survey was conducted utilizing the U.S. EPA definition of LBP. Under this definition, painted surfaces which contain lead in concentrations equal to or greater than 1.0 milligrams per square centimeter ( $\geq 1.0 \text{ mg/cm}^2$ ) are classified as coated with LBP. Paints with concentrations of lead detectable by the XRF are considered lead-containing paints. Additionally, fixtures or components that are manufactured with a factory applied glazing (i.e., sinks, toilets, ceramic tiles, etc.) are tested as these factory-applied finishes often contain lead. Activities which disturb lead-containing paints and glazing (while not lead-based paints by the U.S. EPA definition) are regulated by OSHA (29 CFR 1926.62).

Because the scope of the project was a lead-based paint screen, the LBP survey was not conducted in accordance with HUD Chapter 7 requirements. This representative survey included taking readings from walls, windows, doors, and miscellaneous components. Walls are listed by letter with wall "A" being the entrance of the subject building, proceeding clockwise to "B, C, D", etc.

### 3.3 Universal Waste and Suspect Liquid PCB-Containing Equipment

ECS performed a visual survey of within the building and exterior for the presence of universal waste materials and suspect liquid PCB-containing equipment. ECS entered the accessible areas to identify universal waste materials including batteries, stored pesticides, mercury-containing equipment and lamps. Additionally, lamp ballasts suspected of containing PCBs and lead-containing equipment were documented if observed.

No sampling or other characterization was performed as part of this scope of service. Additionally, ECS did not access any energized electrical equipment or other equipment/devices which were in use or that may pose a hazard to ECS personnel or building occupants.

### **4.0 RESULTS**

The following is a summary of laboratory results, findings and observations.



### 4.1 Asbestos-Containing Materials

An Asbestos-Containing Material (ACM) is defined as any material containing more than one percent (>1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, PLM. Materials are categorized by the U.S. EPA in the following categories:

- Friable ACMs are defined as any ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Non-friable ACMs are defined as any ACM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- Category I non-friable ACM are listed as following: packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than one percent (>1%) asbestos.
- Category II non-friable ACM are listed as any material, excluding Category I non-friable ACM, containing more than one percent (>1%) asbestos.

Regulated Asbestos Containing Materials (RACM) are friable ACM or non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading or has crumbled, been pulverized, or reduced to powder in the course of renovation and/or demolition operations.

Scientific Analysis Institute submitted a signed final laboratory report to ECS. Five (5) of the bulk samples submitted for analysis were reported to contain asbestos in detectable concentrations. These materials are summarized below. In total, 86 bulk samples were submitted to the laboratory of which 113 layers were analyzed. A complete list of the sampled materials submitted for analysis and sample locations are located in the Appendix of this report. Additional details regarding the overall locations of the materials identified as asbestos-containing are provided further in the report. Photographs of collected samples reported as asbestos-containing are also located in the Appendix of this report.

### Summary of Asbestos-Containing Materials Identified

Location	Material Description	Analytical Result	Category
4th Floor Hallway (Assumed Throughout Building)	Tan Joint Compound	3% Chrysotile	Category II Non-Friable
Unit 1114 (Assumed in other Units Throughout)	Tan Linoleum under Tile in Bathroom	25% Chrysotile	Category I Non-Friable
10th Floor Storage Room (All Storage and Electrical Closets and First Floor)	Brown Mastic associated with 12"x12" Brown with Brown Streaks Floor Tile	3% Chrysotile	Category l Non-Friable
Unit 709 (Assumed in other Units Throughout)	Brown Stone Pattern Linoleum Sheeting	25% Chrysotile	Category I Non-Friable



Location	Material Description	Analytical Result	Category
Stairwell and First Floor Hallway	Mixed Mastics and Gray Leveling Compound associated with 12"x12" White with Gray Flecks Floor Tile	3%Chrysotile	Category l Non-Friable

### Wall Systems:

Tan asbestos-containing joint compound was observed in the 4th floor hallway. The asbestos-containing joint compound is assumed to be located in other areas of the building. Due to the renovation history of the building, further delineation of asbestos-containing joint compound is recommended prior to renovations.

### Flooring Systems:

ECS observed asbestos-containing brown mastic associated with 12" x 12" brown with brown streaks floor tile in the first floor western hallway, first floor game room, and storage and electrical closets throughout the building. Asbestos-containing mixed mastics and leveling compound associated with 12" x 12" white with gray flecks floor tile was observed in the first floor eastern stairwell and first floor northern hallway. ECS recommends that black or brown mastics observed throughout the building should be considered asbestos-containing or additional delineation should be performed.

ECS also observed asbestos-containing tan linoleum sheeting under floor tile in bathrooms and kitchens in multiple locations. Asbestos-containing brown stone print linoleum sheeting was observed in the kitchens of several units and is assumed to be present in other locations throughout the building.

Please note that in general, the above-identified asbestos-containing flooring systems and/or mastics are most likely underneath other flooring systems, carpet, partition walls, cabinets, furniture, etc.

Note that ECS only accessed 10% of the units within the building. Many of the units had similar finishes; however, due to varying renovation histories, additional asbestos-containing building materials may be present within the building.

### 4.2 Suspect or Assumed Asbestos-Containing Materials

Due to the inaccessibility or the destructive means that asbestos sampling requires, additional suspect ACMs may remain within the building hidden behind inaccessible areas that include, but are not limited to, sub-grade walls, structural members, topping slabs, sub-grade sealants, flooring located below underlayments, areas behind exterior walls, pipe trenches, and subsurface utilities, etc. These areas were deemed inaccessible and were not assessed.

If these materials are discovered during construction activities, they should be presumed to contain asbestos and be treated as ACMs or be sampled immediately upon discovery and prior to disturbance for asbestos content by a certified asbestos inspector in accordance with 29 CFR 1926.1101.



Based upon our past experience in the identification of ACMs in similarly constructed buildings, the following additional suspect ACMs may also be located in inaccessible areas of the structure:

- Pipe Flange Gaskets associated with heating and plumbing systems
- **Thermal System Insulation** associated with heating and plumbing systems, behind solid walls and/or above solid ceilings, within chases, and below subgrade
- Fire Door Insulation in doors and associated casing
- Flooring Systems (not previously identified)
- Water Fountain Components including wrap, sink coatings, and insulation
- Elevator Components (Panels, Doors, Brake Shoes, Roping, etc.)
- Electrical Panels Cement Components and Electrical Cloth in electrical systems
- **Waterproofing Membrane/Mastics** behind exterior walls, exterior veneer and/or sub-grade walls (not previously identified)
- Interior Air Handler Components
- Asbestos-Cement Pipe Conduit encased in duct banks and/or below sub-grade
- Spray-On Fireproofing (not previously identified)
- **Unidentified Roofing Materials** that may be present under concrete or other sheathing on top of previously roofing layers or under flashing
- CMU Block Filler and or Coating (Vermiculite Filler)
- Mastics associated with Mirrors, Countertops, Ceramic Tile, and Boards

### 4.3 Lead in Paint and Surface Coatings

Paint and surface coatings which contain detectable concentrations of lead considered "lead-containing paints". Since OSHA has no specific action level for lead in paint, all paint on the site found to have a measurable concentration of lead should be assumed to be lead containing. Work performed which may disturb lead-containing paint is regulated under OSHA as referenced under 29 CFR 1926.62. A total of 78 readings were collected during the survey, including calibration readings. Paint and other surface coatings which are defined by applicable regulation as lead-based paints are summarized in the table below and photographs of lead-based paint and glazes identified are located in the Appendix.

According to OSHA, building materials with any detectable concentration of lead are considered "lead-containing". Additional lead-containing paints and coatings were identified. The components found to have lead-containing paints or coatings include the following:

- Brown Metal Door Casing
- Orange Metal Downspouts
- Green Metal Door Casings
- White Metal Door Casings
- Gray CMU Walls



### Summary of XRF Lead-Based Paint Results

Location	Color	Substrate	Component
11th Floor - Unit 1124	White	Ceramic	Wall
9th Floor - Unit 901	Beige	Ceramic	Wall
1st Floor Janitor's Closet	White	Ceramic	Sink

### 4.4 Universal Waste and Liquid Suspect PCB-Containing Equipment

The disposal of fixtures and equipment in buildings which contain various substances such as mercury or lead are regulated by local, state, and federal regulation. Collectively most mercury-containing materials and batteries which may contain lead, along with stored pesticides are classified as "Universal Waste". The disposal of lamp ballasts and electrical transformers which contain suspect PCB-containing oils is also regulated at the state and federal level.

### 4.4.1 Suspect Polychlorinated Biphenyl (PCB) Containing Ballasts and Equipment

Polychlorinated biphenyls (PCBs) are toxic coolants or lubricating oils used in some electrical transformers and capacitors, hydraulically-operated equipment, light ballasts, and other similar equipment.

As part of our survey, ECS attempted to identify potential liquid PCB containing materials and equipment. At the time of the Hazardous Materials Survey, ECS visually observed several of the fluorescent light ballasts in accessible areas of the structure in an attempt to identify labeling indicating the presence/absence of PCB containing fluids. Labeling was not observed or accessible on the ballasts surveyed. At this time it is recommended that all ballasts be assumed to be suspect PCB containing.

### 4.4.2 Mercury-Containing Components

The EPA classifies mercury as both hazardous and toxic. The survey included observations for equipment which could contain mercury, such as thermostats, transformers, fluorescent lamps, and switch-containing devices.

As previously discussed, fluorescent lamps were observed. The fluorescent lamps may contain small quantities of mercury.

### 4.4.3 Batteries

Lead-acid batteries located in emergency lamps, exit signs, alarm panels and associated with electrical components, etc. were observed or are assumed to be present. No evidence of leaking or damage was observed.



### 4.4.4 Pesticides

No pesticides were observed on site at the time of the survey.

### 4.4.5 Other Materials Observed

Refrigerators, freezers, exit signs, household cleaning supplies, paint, unknown drums in the boiler room, and fire extinguishers were observed on site.

### **5.0 RECOMMENDATIONS AND REGULATORY REQUIREMENTS**

Based on our understanding of the purpose of the Hazardous Materials Survey, the results of laboratory analysis, and our findings and observations, ECS presents the following recommendations.

### **5.1 Asbestos-Containing Materials**

ECS recommends where a material type has been identified as asbestos containing that other materials with similar color, texture, age and size throughout the building's interior and exterior be assumed to contain asbestos. Please refer to Section 4.1 for a complete list of building materials that were reported positive for asbestos and to Section 4.2 for materials that were assumed to contain asbestos.

Asbestos-containing materials to be disturbed as part of the proposed renovation must be properly removed by a Virginia-licensed asbestos abatement contractor prior to disturbance by construction activities. The Commonwealth of Virginia requires 20 calendar-days notice prior to an asbestos project involving greater than or equal to 10 linear feet or 10 squared feet of select building materials. The EPA requires 10 working days notice prior to removal of regulated ACM (RACM) in quantities greater than or equal to 160 square feet, 260 linear feet, or 35 cubic feet. Notification requirements in general will be dependent on the means/methods used by the contractor to abate the materials found in the building.

If ACMs are to be removed, it is recommended that an industrial hygienist monitor the project. This involves collecting air samples from within and outside abatement work areas to monitor the asbestos abatement contractor's work practices over the course of the project. The industrial hygienist should evaluate if the asbestos abatement work is in accordance with project specifications, U.S. EPA regulation 40 CFR Part 61-National Emission Standards for Hazardous Air Pollutants Subpart M: National Emission Standard for Asbestos, and U.S. Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 – Asbestos in Construction. The industrial hygienist should assess each work area to monitor the removal of ACMs. Only after the industrial hygienist has determined the identified ACMs have been removed should final clearance air samples be collected (if necessary).

Suspect ACMs not observed due to inaccessibility or not sampled due to the destructive means that sampling would require may also be encountered during construction activities. At the time of the survey, only limited destructive means were used to locate or sample suspect ACMs; therefore, additional suspect ACMs may remain within inaccessible areas that include, but are not limited to, sub-grade walls, the roof, structural members, topping slabs, exterior areas, sub-grade sealants, flooring located below underlayments, vapor barriers, pipe trenches and other subsurface utilities. If



additional suspect ACMs are uncovered which were not accessible during this survey, it is recommended that these materials either be assumed to contain asbestos or be sampled prior to disturbance upon discovery for asbestos content by an asbestos inspector in accordance with 29 CFR 1926.1101.

Due to the matrix of the material, joint compound may be submitted to the laboratory for point count analysis to determine if the quantity of asbestos is below the EPA threshold of <1%. Should the joint compound be found to be less than 1% asbestos, the material can be removed in accordance with OSHA Asbestos in Construction regulations (29 CFR 1929.1101).

Should any identified ACM remain in place, ECS recommends the development and implementation of a site-specific Asbestos Operations and Maintenance Plan detailing routine maintenance and repair operations, contractor notification procedures, and all other requirements under OSHA – reference 29 CFR 1926.1101.

ECS recommends that a project specification be prepared to delineate and quantify known and suspect hazardous and regulated materials in the buildings and to outline proper procedures for the abatement. This will help protect the owner's liability in better defining the scope of work and contractors' roles and responsibilities in the abatement process and holding the contractor accountable for the performance of the project. The specification typically defines the Contractor's scope of work and outline requirements and procedures that must be followed for the project. The intent of the specification is to give performance requirements for the Contractor so that the project can be completed safely and in compliance with applicable federal and state regulations. Typically, the specification document serves as part of the site owner's contract with the contractor.

### 5.2 Lead in Paint and Surface Coatings

Based on the findings of the lead survey, lead-based glazes were identified on white and beige ceramic tile and white ceramic custodial sinks. The following components were identified with lead-containing surface coatings: orange metal downspouts, the green metal door casings, white metal door casings, and gray CMU walls.

The presence of lead is a concern primarily when conditions exist where it may inhaled or ingested. Regardless of the analytical results of a material, all painted and/or glazed surfaces may still contain concentrations of lead in the paint, which when disturbed, may generate lead dust greater than the Permissible Exposure Limit (PEL) of 50 micrograms per cubic meter (ug/m3) as an 8-hour Time Weighted Average (TWA) established by the OSHA "Lead Exposure in Construction Rule (29 CFR 1926.62)."

The OSHA standard gives no guidance on acceptable levels of lead in paint at which no exposure to airborne lead (above the action level) would be expected. Rather, OSHA defines airborne concentrations, and references specific types of work practices and operations from which a lead hazard may be generated (reference 29 CFR 1926.62, section d). Environmental and personnel monitoring should be conducted during any removal/demolition process (as appropriate) to verify that actual personal exposures are below the Permissible Exposure Limit (PEL) of 50 micrograms



per cubic meter (µg/m<sup>3</sup>) as an 8-hour Time Weighted Average (TWA). Under OSHA requirements, the contractor performing renovation work will be required to conduct this monitoring and follow applicable requirements under 29 CFR 1926.62 if disturbing lead-containing paint.

If in the future any portion of the site is to be used for residential or child-occupied use, U.S. EPA Regulations (40 CFR 745) under the Renovation, Repair, and Paint (RRP) Rule apply to all work which will involve window replacement, involve the demolition of painted surfaces, or disturb paint in excess of 6 square feet per interior room or 20 square feet of exterior space. Should this scenario be relevant now or in the future, a work plan is recommended to be prepared prior to start of work to outline general requirements under RRP regulations and to specify contractor requirements including certification by the U.S. EPA under the RRP rule.

### 5.3 Universal Waste and Liquid PCBs in Equipment

Fluorescent lamp ballasts manufactured prior to 1979 may contain small quantities of PCBs. Additionally, regardless of "PCB labeling," ballasts produced between 1980 and 1991 may contain di-ethyl hexyl phthalate (DEHP) which is classified as a potential carcinogen by the EPA. Additionally, DEHP contamination on Superfund sites is common and responsible parties are subject to liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) should cleanup of DEHP be necessary. ECS recommends that all ballasts suspected to contain PCBs be properly recycled or disposed of in accordance with US EPA and regulations. In practice many ballasts lacking the "No-PCBs" label have been removed from buildings as part of routine maintenance; however, inspection of each ballast by the contractor performing removal is still recommended to ensure proper disposal into the proper waste stream.

ECS recommends that fluorescent lamp tubes/bulbs suspected to contain mercury be properly recycled or disposed of in accordance with EPA and Commonwealth of Virginia regulations. Recycling is the most environmental friendly means of disposal for these materials. Fluorescent lamps may be disposed as universal waste if they remain unbroken during removal. If bulbs are crushed or broken prior to disposal, they are classified as hazardous waste by the EPA.

The disposal of universal waste and lamp ballasts must be performed in a manner by which the individual wastes are segregated and disposed of properly as required by federal regulations. If any of these materials are observed to be leaking or otherwise damaged prior to disposal they must be disposed of as hazardous waste in accordance with EPA regulations. Handling, packaging, labeling, and disposal of hazardous materials should be performed in accordance with EPA and Department of Transportation regulations.

Generators of universal and hazardous waste must obtain an EPA Generator ID number in order to dispose of these materials.

### 5.3.1 Other Hazardous and Regulated Waste

Refrigerants, lead-acid batteries, electronics, exit signs, unknown drums in the boiler room, and household paints and cleaning materials should be recycled or disposed of in accordance with Commonwealth of Virginia and Federal regulations.



### **6.0 LIMITATIONS**

The conclusions and recommendations presented within this report are based upon a reasonable level of assessment within normal bounds and standards of professional practice for a site in this particular geographic setting. ECS is not responsible or liable for the discovery and elimination of hazards that may potentially cause damage, accidents, or injuries.

During this study, samples were submitted for analysis at an accredited laboratory via polarized light microscopy. As with any similar survey of this nature, actual conditions exist only at the precise locations from which samples were collected. Certain inferences are based on the results of this sampling and related testing to form a professional opinion of conditions in areas beyond those from which the samples were collected. No warranty, expressed or implied, is made.

The observations, conclusions, and recommendations pertaining to environmental conditions at the subject site are necessarily limited to conditions observed, and/or materials reviewed at the time this study was undertaken. No warranty, expressed or implied, is made with regard to the conclusions and recommendations presented within this report. This report is provided for the exclusive use of the client. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties without the written consent of ECS and the client.

Our recommendations are in part based on federal, state, and local regulations and guidelines. ECS does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, state, or federal public agencies, any conditions at the site that may present a potential danger to public health, safety, or the environment. Under this scope of services, ECS assumes no responsibility regarding any response actions initiated as a result of these findings. General compliance with regulations and response actions are the sole responsibility of the Client and should be conducted in accordance with local, state, and/or federal requirements.



# **Appendix I: Site Photographs**



1 - Asbestos-containing brown mastic associated with 12"x12" brown with brown streaks floor tile



2 - Asbestos-containing linoleum sheeting under floor tile was observed in bathrooms and kitchens





3 - Asbestos-containing brown stone print linoleum sheeting



4 - Asbestos-containing mixed mastics and leveling compound associated with 12"x12" white with gray flecks floor tile





5 - Lead-based beige ceramic tile



6 - Household paints and chemicals





7 - Household chemicals



8 - Household paints and chemicals





9 - Drums in the boiler room



10 - Mercury-containing light tubes



## Appendix II: Asbestos Bulk Sample Results



Sample #	Sampling Location	Material/Description	Analytical Results
1	Roof	Black Caulk on Vent	NAD
2	Roof	Black Caulk on Vent	NAD
3	Roof	Gray Flashing Caulk	NAD
4	Roof	Gray Flashing Caulk	NAD
5	Roof	Tar/Shingle on Vent	NAD
6	Roof	Tar/Shingle on Vent	NAD
7	Stair to Roof	Black Interior Window Caulk	NAD
8	4th Floor Hallway	Black Interior Window Caulk	NAD
09 - A	11th Floor Hallway	12"x12" White with Black Flecks Floor Tile	NAD
09 - B	11th Floor Hallway	Yellow Mastic associated with 12"x12" White with Black Flecks Floor Tile	NAD
10 - A	7th Floor Hallway	12"x12" White with Black Flecks Floor Tile	NAD
10 - B	7th Floor Hallway	Yellow Mastic associated with 12"x12" White with Black Flecks Floor Tile	NAD
11	11th Floor Hallway	Drywall	NAD
12	Unit 1107	Joint Compound	NAD
13	10th Floor Laundry Room	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
14	10th Floor Trash Room	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
15	9th Floor Hallway	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
16	Unit 901	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
17	Unit 401	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
18	4th Floor Hallway	Drywall/Joint Compound	Drywall: NAD Joint Compound: 3% Chrvsotile
19	Game Room	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
20	1st Floor Hallway	Drywall/Joint Compound	Drywall: NAD Joint Compound: NAD
21	11th Floor Hallway	Textured "Popcorn" Ceiling	NAD
22	10th Floor Laundry Room	Textured "Popcorn" Ceiling	NAD
23	Unit 901	Textured "Popcorn" Ceiling	NAD
24	Unit 1109	White Interior Door Caulk	NAD
25	10th Floor Storage Room	White Interior Door Caulk	NAD
26 - A	Unit 1114	12"x12" White with Brown Flecks Floor Tile	NAD



Sample #	Sampling Location	Material/Description	Analytical Results
26 - B	Unit 1114	Yellow Mastic associated with 12"x12" White with Brown Flecks Floor Tile	NAD
27 - A	Unit 1114	12"x12" White with Brown Flecks Floor Tile	NAD
27 - B	Unit 1114	Yellow Mastic associated with 12"x12" White with Brown Flecks Floor Tile	NAD
28 - A	Unit 1114	12"x12" Tan with Tan Flecks Floor Tile	NAD
28 - B	Unit 1114	Yellow Mastic associated with 12"x12" Tan with Tan Flecks Floor Tile	NAD
29 - A	Unit 1114	12"x12" Tan with Tan Flecks Floor Tile	NAD
29 - B	Unit 1114	Yellow Mastic associated with 12"x12" Tan with Tan Flecks Floor Tile	NAD
30 - A	Unit 1114	12"x12" White with Red and Blue Flecks Floor Tile	NAD
30 - B	Unit 1114	Yellow Mastic associated with 12"x12" White with Red and Blue Flecks Floor Tile	NAD
31 - A	Unit 1114	12"x12" White with Red and Blue Flecks Floor Tile	NAD
31 - B	Unit 1114	Yellow Mastic associated with 12"x12" White with Red and Blue Flecks Floor Tile	NAD
32 - A	Unit 1114	12"x12" Gray with White Streaks Floor Tile	NAD
32 - B	Unit 1114	Yellow Mastic associated with 12"x12" Gray with White Streaks Floor Tile	NAD
33 - A	Unit 1114	12"x12" Gray with White Streaks Floor Tile	NAD
33 - B	Unit 1114	Yellow Mastic associated with 12"x12" Gray with White Streaks Floor Tile	NAD
34	Unit 1114	Linoleum under Tile in Bathroom	25% Chrysotile
35	Unit 1114	Linoleum under Tile in Bathroom	N/A
36 - A	Unit 1114	4" Brown Cove Base	NAD
36 - B	Unit 1114	Tan Mastic associated with 4" Brown Cove Base	NAD
37 - A	Unit 1114	4" Brown Cove Base	NAD
37 - B	Unit 1114	Tan Mastic associated with 4" Brown Cove Base	NAD
38	Unit 1114	Brown Spray-On Fireproofing	NAD
39	Unit 1114	Brown Spray-On Fireproofing	NAD
40	Unit 1114	Brown Spray-On Fireproofing	NAD
40 (also labeled as 40)	Unit 1114	Paper Thermal System Insulation Wrap on Fiberglass	NAD
41	10th Floor Electric Closet	Paper Thermal System Insulation Wrap on Fiberglass	NAD
42	Boiler Room	Paper Thermal System Insulation Wrap on Fiberglass	NAD
43 - A	11th Floor Laundry Room	4" Black Cove Base	NAD



Sample #	Sampling Location	Material/Description	Analytical Results
43 - B	11th Floor Laundry Room	Yellow Mastic associated with 4" Black Cove Base	NAD
44	4th Floor Laundry Room	4" Black Cove Base	NAD
45 - A	10th Floor Storage Room	12"x12" Brown with Brown Streaks Floor Tile	NAD
45 - B	10th Floor Storage Room	Brown Mastic associated with 12"x12" Brown with Brown Streaks Floor Tile	3% Chrysotile
46 - A	1st Floor Game Room	12"x12" Brown with Brown Streaks Floor Tile	NAD
46 - B	1st Floor Game Room	Brown Mastic associated with 12"x12" Brown with Brown Streaks Floor Tile	N/A
47 - A	Unit 901	12"x12" Gray with Black Specs Floor Tile	NAD
47 - B	Unit 901	Mixed Black and Yellow Mastic associated with 12"x12" Gray with Black Specs Floor Tile	NAD
48 - A	Unit 901	12"x12" Gray with Black Specs Floor Tile	NAD
48 - B	Unit 901	Mixed Black and Yellow Mastic associated with 12"x12" Gray with Black Specs Floor Tile	NAD
49	Unit 810	Tan with Red and White Specs Linoleum Sheeting	NAD
50	Unit 810	Tan with Red and White Specs Linoleum Sheeting	NAD
51	Unit 709	Brown Stone Pattern Linoleum Sheeting	25% Chrysotile
52	Unit 709	Brown Stone Pattern Linoleum Sheeting	N/A
53 - A	Stairwell	Brown Stair Tread	NAD
53 - B	Stairwell	Yellow Mastic associated with Brown Stair Tread	NAD
54 (No 55) - A	Stairwell	Brown Stair Tread	NAD
54 (No 55) - B	Stairwell	Yellow Mastic associated with Brown Stair Tread	NAD
56 (No 55) - A	Stairwell	4" Brown Cove Base	NAD
56 (No 55) - B	Stairwell	Yellow Mastic associated with 4" Brown Cove Base	NAD
57 - A	Stairwell	4" Brown Cove Base	NAD
57 - B	Stairwell	Yellow Mastic associated with 4" Brown Cove Base	NAD
58 - A	Stairwell	12"x12" White with Gray Flecks Floor Tile	NAD
58 - B	Stairwell	Mixed Mastics and Gray Leveling Compound associated with 12"x12" White with Gray Flecks Floor Tile	3%Chrysotile
59 - A	1st Floor Hallway	12"x12" White with Gray Flecks Floor Tile	NAD
59 - B	1st Floor Hallway	Mixed Mastics and Gray Leveling Compound associated with 12"x12" White with Gray Flecks Floor Tile	N/A
60 - A	Stairwell	12"x12" Black with White Flecks Floor Tile	NAD
60 - B	Stairwell	Yellow Mastic associated with 12"x12" Black with White Flecks Floor Tile	NAD



Sample #	Sampling Location	Material/Description	Analytical Results
61 - A	1st Floor Hallway	12"x12" Black with White Flecks Floor Tile	NAD
61 - B	1st Floor Hallway	Yellow Mastic associated with 12"x12" Black with White Flecks Floor Tile	NAD
62	1st Floor Game Room	12"x12" Tan with Green and Brown Flecks Floor Tile	NAD
63	1st Floor Game Room	12"x12" Tan with Green and Brown Flecks Floor Tile	NAD
64 - A	1st Floor Game Room	12"x12" White with Light Tan Streaks Floor Tile	NAD
64 - B	1st Floor Game Room	Yellow Mastic associated with 12"x12" White with Light Tan Streaks Floor Tile	NAD
65 - A	1st Floor Game Room	12"x12" White with Light Tan Streaks Floor Tile	NAD
65 - B	1st Floor Game Room	Yellow Mastic associated with 12"x12" White with Light Tan Streaks Floor Tile	NAD
66	1st Floor Game Room	12"x12" Green Floor Tile	NAD
67	1st Floor Game Room	12"x12" Green Floor Tile	NAD
68	1st Floor Game Room	2'x4' White Mixed-Size Pin Ceiling Tile	NAD
69	1st Floor Game Room	2'x4' White Mixed-Size Pin Ceiling Tile	NAD
70	1st Floor Game Room	2'x4' White Pins and Worms Ceiling Tile	NAD
71	1st Floor Game Room	2'x4' White Pins and Worms Ceiling Tile	NAD
72	1st Floor Game Room	2'x4' White Small and Large Pins Ceiling Tile	NAD
73	1st Floor Game Room	2'x4' White Small and Large Pins Ceiling Tile	NAD
74	1st Floor Kitchen	2'x2' White Textured Ceiling Tile	NAD
75	1st Floor Kitchen	2'x2' White Textured Ceiling Tile	NAD
76	1st Floor Kitchen	2'x2' White Deep Textured Ceiling Tile	NAD
77	1st Floor Kitchen	2'x2' White Deep Textured Ceiling Tile	NAD
78	Boiler Room	Tan Tank Breaching	NAD
79	Boiler Room	Tan Tank Breaching	NAD
80	Boiler Room	Tan Tank Breaching	NAD
81	Boiler Room	White Bridging Mastic	NAD
82	Boiler Room	White Bridging Mastic	NAD
83	Exterior	Black Exterior Window Caulk	NAD
84	Exterior	Black Exterior Window Caulk	NAD
85	Exterior	Black Exterior Door Caulk	NAD



Sample #	Sampling Location	Material/Description	Analytical Results
86	Exterior	Black Exterior Door Caulk	NAD

## Appendix III: XRF Lead-Based Paint Readings



Reading	Room/Location	Side	Color	Substrate	Component	Pb	Pb +/-	Result
2516	С	alibrati	on NIST 25	73		1.10	0.30	
2517	C	alibrati	on NIST 25	73		1.00	0.30	Valid
2518	С	alibrati	on NIST 25	73		1.10	0.30	
2519		Calibi	ation Blank			0.10	0.40	
2520		Calibi	ation Blank			0.20	0.40	Valid
2521		Calibi	ation Blank			-0.30	0.40	
2522	Penthouse Elevator Room	В	Black	Metal	Stair Railing	0.00	0.40	BDL
2523	Penthouse Elevator Room	В	Gray	Metal	Stair Tread	0.10	0.40	BDL
2524	Penthouse Elevator Room	В	Gray	Metal	Stair Stringer	0.00	0.40	BDL
2525	Penthouse Elevator Room	С	Brown	Metal	Door Face	0.00	0.40	BDL
2526	Penthouse Elevator Room	с	Brown	Metal	Door Casing	0.50	0.30	Lead- Containing
2527	Roof	с	Orange	Metal	Gutter Downspout	0.50	0.30	Lead- Containing
2528	Roof	с	Green	Metal	Door Casing	0.30	0.40	Lead- Containing
2529	Roof	С	White	Metal	Stair Railing	0.10	0.40	BDL
2530	Roof	С	White	CMU	Wall	-0.20	0.40	BDL
2531	Stairwell	А	White	Metal	Horizontal Pipe	0.10	0.40	BDL
2532	11th Floor - Hallway	D	White	Plaster	Wall	0.10	0.40	BDL
2533	11th Floor - Hallway	с	Black	Metal	Window Casing	0.20	0.40	BDL
2534	11th Floor - Hallway	с	White	Metal	Radiator	0.00	0.40	BDL
2535	11th Floor - Hallway	В	White	Wood	Baseboard	0.10	0.40	BDL
2536	11th Floor - Hallway	В	Light Blue	Wood	Door Face	0.00	0.40	BDL



Reading	Room/Location	Side	Color	Substrate	Component	Pb	Pb +/-	Result
2537	11th Floor - Hallway	В	Light Blue	Metal	Door Casing	0.00	0.40	BDL
2538	11th Floor - Unit 1124	В	White	Metal	Door Face	0.10	0.40	BDL
2539	11th Floor - Unit 1124	В	White	Metal	Door Jamb	0.10	0.40	BDL
2540	11th Floor - Unit 1124	в	White	Ceramic	Wall	1.70	0.40	Lead- Based
2541	11th Floor - Unit 1124	В	White	Ceramic	Tub	0.00	0.40	BDL
2542	11th Floor - Unit 1124	В	White	Ceramic	Sink	-0.10	0.40	BDL
2543	11th Floor - Unit 1124	D	White	Wood	Window Sill	0.00	0.40	BDL
2544	11th Floor - Unit 1107	В	White	Gypsum	Wall	0.20	0.40	BDL
2545	11th Floor - Unit 1107	A	White	Metal	Radiator	0.00	0.40	BDL
2546	10th Floor - Laundry Room	A	White	Gypsum	Wall	0.10	0.40	BDL
2547	10th Floor - Storage Room	A	Black	Metal	Door Face	-0.20	0.40	BDL
2548	10th Floor - Storage Room	A	Black	Metal	Door Jamb	0.00	0.40	BDL
2549	9th Floor - Unit 901	A	Beige	Ceramic	Wall	1.40	0.30	Lead- Based
2550	9th Floor - Unit 901	A	White	Metal	Door Jamb	0.00	0.40	BDL
2551	9th Floor - Unit 901	A	White	Metal	Door Face	0.10	0.40	BDL
2552	8th Floor - Laundry Room	С	Light Blue	Metal	Door Face	-0.10	0.40	BDL
2553	8th Floor - Laundry Room	С	Light Blue	Metal	Door Casing	0.00	0.40	BDL
2554	7th Floor - Hallway	С	White	Gypsum	Wall	0.00	0.40	BDL
2555	7th Floor - Stairwell	D	White	CMU	Wall	-0.20	0.40	BDL



Reading	Room/Location	Side	Color	Substrate	Component	Pb	Pb +/-	Result
2556	7th Floor - Stairwell	D	White	Metal	Stair Balusters	0.00	0.40	BDL
2557	5th Floor - Elevator Lobby	D	White	Gypsum	Column	0.10	0.40	BDL
2558	4th Floor - Hallway	А	White	Metal	Radiator	0.00	0.40	BDL
2559	4th Floor - Unit 401	А	White	Ceramic	Sink	-0.30	0.40	BDL
2560	4th Floor - Unit 401	А	White	Ceramic	Toilet	-0.20	0.40	BDL
2561	3rd Floor Hallway	С	White	Gypsum	Wall	0.10	0.40	BDL
2562	3rd Floor - Unit 301	С	White	Gypsum	Wall	0.10	0.40	BDL
2563	2nd Floor Elevator Lobby	В	White	Wood	Baseboard	0.00	0.40	BDL
2564	1st Floor Stairwell	В	White	CMU	Wall	-0.30	0.40	BDL
2565	1st Floor Game Room	D	White	Gypsum	Wall	0.00	0.40	BDL
2566	1st Floor Game Room	С	White	Metal	Door Face	-0.10	0.40	BDL
2567	1st Floor Game Room	С	White	Metal	Door Jamb	0.00	0.40	BDL
2568	1st Floor Game Room	А	White	Metal	Radiator	0.00	0.40	BDL
2569	1st Floor Women's Room	В	Gray	Ceramic	Wall	-0.10	0.40	BDL
2570	1st Floor Women's Room	В	Gray	Ceramic	Floor	0.10	0.40	BDL
2571	1st Floor Women's Room	В	Gray	Ceramic	Baseboard	0.20	0.40	BDL
2572	1st Floor Women's Room	D	Pink	Gypsum	Wall	0.10	0.40	BDL
2573	1st Floor Boiler Room	D	White	CMU	Wall	-0.50	0.40	BDL
2574	1st Floor Boiler Room	D	Red	Metal	Vertical Pipe	0.10	0.40	BDL



Reading	Room/Location	Side	Color	Substrate	Component	Pb	Pb +/-	Result
2575	1st Floor Boiler Room	D	White	Metal	Door Face	0.10	0.40	BDL
2576	1st Floor Boiler Room	D	White	Metal	Door Casing	0.50	0.30	Lead- Containing
2577	1st Floor Hallway	в	Brown	СМИ	Wall	-0.40	0.40	BDL
2578	1st Floor Janitor's Closet	в	Gray	СМИ	Wall	0.30	0.40	Lead- Containing
2579	1st Floor Janitor's Closet	в	White	Ceramic	Sink	27.90	0.40	Lead- Based
2580	1st Floor Community Room	С	White	Gypsum	Wall	0.10	0.40	BDL
2581	1st Floor Community Room	С	White	Concrete	Column	0.10	0.40	BDL
2582	1st Floor Community Room	В	Gray	Metal	Door Face	0.00	0.40	BDL
2583	1st Floor Community Room	В	Gray	Metal	Door Casing	0.10	0.40	BDL
2584	Exterior	А	White	Concrete	Wall	0.00	0.40	BDL
2585	Exterior	А	Black	Metal	Window Casing	0.20	0.40	BDL
2586	Exterior	А	Black	Metal	Window Sill	0.00	0.40	BDL
2587	Exterior	в	Brown	Metal	Door Face	0.10	0.40	BDL
2588	Exterior	в	Brown	Door Casing	Door Casing	0.10	0.40	BDL
2589	C	alibratio	on NIST 25	73		1.00	0.30	
2590	C	alibratio	on NIST 25	573		1.10	0.30	Valid
2591	C	alibratio	on NIST 25	573		1.10	0.30	
2592		Calibr	ation Blank			0.00	0.40	
2593		Calibr	ation Blank			0.00	0.40	Valid
2594		Calibr	ation Blank			0.00	0.40	

## Appendix IV: Laboratory Report(s)



By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

 Lab Order ID:
 71958445

 Analysis ID:
 71958445\_PLM

 Date Received:
 1/22/2021

 Date Reported:
 1/26/2021

Sample ID	Description	Ashastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	ASUESIUS	Components	Components	Treatment
01	Black Caulk on Vent	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_1	-				Dissolved
02	Black Caulk on Vent	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_2	-				Dissolved
03	Gray Flashing Caulk	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM_3	-				Dissolved
04	Gray Flashing Caulk	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM_4					Dissolved
05	Tar/Shingle on Vent	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_5	-				Dissolved
06	Tar/Shingle on Vent	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_6	-				Dissolved
07	Black Interior Window Caulk	None Detected	2% Cellulose	98% Other	Black Non Fibrous Homogeneous
71958445PLM_7	-				Dissolved
08	Black Interior Window Caulk	None Detected	2% Cellulose	98% Other	Black Non Fibrous Homogeneous
71958445PLM_8					Dissolved

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommend that analysis of floor tiles, vermiculite, and/or heterogeneous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Analytical uncertainty available upon request. Scientific Analytical Institute participates in the NVLAP Proficiency Testing program. Unless otherwise noted blank sample correction was not performed. Estimated MDL is 0.1%.

Charmel Dozier (113)

Analyst

w h Approved Signatory



By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

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 Analysis ID:
 71958445\_PLM

 Date Received:
 1/22/2021

 Date Reported:
 1/26/2021

Sample ID	Description		Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
09 - A	12"x12" White with Black Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_9	tile				Dissolved
09 - B	12"x12" White with Black Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_87	mastic-small sample				Dissolved
10 - A	12"x12" White with Black Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_10	tile				Dissolved
10 - B	12"x12" White with Black Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_88	mastic-small sample				Dissolved
11	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_11	drywall				Crushed
12	Drywall/Joint Compound	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_12	joint compound				Crushed
13	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_13	drywall: none detect; joint compnd: none detect				Crushed
14	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_14	drywall: none detect; joint compnd: none detect				Crushed

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Charmel Dozier (113)

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 Date Reported:
 1/26/2021

Sample ID	Description	Asbastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
15	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_15	<ul> <li>drywall: none detect; joint compnd: none detect</li> </ul>				Crushed
16	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_16	<ul> <li>drywall: none detect; joint compnd: none detect</li> </ul>				Crushed
17	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_17	<i>drywall: none detect; joint compnd: none detect</i>	1			Crushed
18	Drywall/Joint Compound	<1% Chrysotile	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_18	- drywall: none detect; joint compnd: 3% chrysotile	1			Crushed
19	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_19	<ul> <li>drywall: none detect; joint compnd: none detect</li> </ul>				Crushed
20	Drywall/Joint Compound	None Detected	15% Cellulose	85% Other	White, Tan Fibrous Homogeneous
71958445PLM_20	<ul> <li>drywall: none detect; joint compnd: none detect</li> </ul>				Crushed
21	Textured "Popcorn" Ceiling	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_21	<u> </u>				Crushed
22	Textured "Popcorn" Ceiling	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM 22	-				Crushed

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Charmel Dozier (113)

Analyst

w h Approved Signatory



By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



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 Analysis ID:
 71958445\_PLM

 Date Received:
 1/22/2021

 Date Reported:
 1/26/2021

Sample ID	Description	Ashestas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
23	Textured "Popcorn" Ceiling	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_23	-				Crushed
24	White Interior Door Caulk	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_24	-				Dissolved
25	White Interior Door Caulk	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_25	-				Dissolved
26 - A	12"x12" White with Brown Flecks Floor Tile with Yellow Maste	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_26	tile				Dissolved
26 - B	12"x12" White with Brown Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_89	mastic				Dissolved
27 - A	12"x12" White with Brown Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_27	tile				Dissolved
27 - B	12"x12" White with Brown Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_90	mastic				Dissolved
28 - A	12"x12" Tan with Tan Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Tan Non Fibrous Homogeneous
71958445PLM 28	tile				Dissolved

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Charmel Dozier (113)

Analyst

w h Approved Signatory



By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

 Lab Order ID:
 71958445

 Analysis ID:
 71958445\_PLM

 Date Received:
 1/22/2021

 Date Reported:
 1/26/2021

Sample ID	Description	Achastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
28 - B	12"x12" Tan with Tan Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_91	mastic				Dissolved
29 - A	12"x12" Tan with Tan Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Tan Non Fibrous Homogeneous
71958445PLM_29	tile				Dissolved
29 - B	12"x12" Tan with Tan Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_92	mastic				Dissolved
30 - A	12"x12" White with Red and Blue Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_30	- tile				Dissolved
30 - B	12"x12" White with Red and Blue Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_93	mastic				Dissolved
31 - A	12"x12" White with Red and Blue Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_31	tile				Dissolved
31 - B	12"x12" White with Red and Blue Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_94	mastic				Dissolved
32 - A	12"x12" Gray with White Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM 32	tile	ļ			Dissolved

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Charmel Dozier (113)

Analyst

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By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

 Lab Order ID:
 71958445

 Analysis ID:
 71958445\_PLM

 Date Received:
 1/22/2021

 Date Reported:
 1/26/2021

Sample ID	Description		Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
32 - B	12"x12" Gray with White Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_95	mastic				Dissolved
33 - A	12"x12" Gray with White Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM_33	tile				Dissolved
33 - B	12"x12" Gray with White Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_96	mastic				Dissolved
34	Lenolium under Tile in Bathroom	25% Chrysotile	5% Cellulose	70% Other	Beige Fibrous Homogeneous
71958445PLM_34	linoleum with inseparable mastic				Teased, Dissolved
35	Lenolium under Tile in Bathroom	Not Analyzed			
71958445PLM_35	-				
36 - A	4" Brown Cove Base with Tan Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_36	cove base				Dissolved
36 - B	4" Brown Cove Base with Tan Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_97	mastic				Dissolved
37 - A	4" Brown Cove Base with Tan Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM 37	cove base				Dissolved

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Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

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 Analysis ID:
 71958445\_PLM

 Date Received:
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Sample ID	Description	Ashastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
37 - B	4" Brown Cove Base with Tan Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_98	mastic				Dissolved
38	Brown Spray-On Fireproofing	None Detected	90% Cellulose	10% Other	Brown Fibrous Homogeneous
71958445PLM_38	-				Teased
39	Brown Spray-On Fireproofing	None Detected	90% Cellulose	10% Other	Brown Fibrous Homogeneous
71958445PLM_39	-				Teased
40	Brown Spray-On Fireproofing	None Detected	90% Cellulose	10% Other	Brown Fibrous Homogeneous
71958445PLM_40	-				Teased
40 (also labeled as 40)	Paper Thermal System Insulation Wrap on Fiberglass	None Detected	50% Cellulose 5% Fiber Glass	45% Other	White Fibrous Homogeneous
71958445PLM_41					Ashed
41	Paper Thermal System Insulation Wrap on Fiberglass	None Detected	50% Cellulose 5% Fiber Glass	45% Other	White Fibrous Homogeneous
71958445PLM_42	-				Ashed
42	Paper Thermal System Insulation Wrap on Fiberglass	None Detected	5% Fiber Glass	95% Other	White Fibrous Homogeneous
71958445PLM_43	-				Ashed
43 - A	4" Black Cove Base with Yellow Mastic	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM 44	cove base				Dissolved

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 Lab Order ID:
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Sample ID	Description	A shorton	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
43 - B	4" Black Cove Base with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_99	mastic				Dissolved
44	4" Black Cove Base with Yellow Mastic	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_45	cove base only				Dissolved
45 - A	12"x12" Brown with Brown Streaks Floor Tile with Black Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_46	tile				Dissolved
45 - B	12"x12" Brown with Brown Streaks Floor Tile with Black Mastic	3% Chrysotile		97% Other	Black Non Fibrous Homogeneous
71958445PLM_100	mastic				Dissolved
46 - A	12"x12" Brown with Brown Streaks Floor Tile with Black Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_47	tile				Dissolved
46 - B	12"x12" Brown with Brown Streaks Floor Tile with Black Mastic	Not Analyzed			
71958445PLM_101	mastic				
47 - A	12"x12" Gray with Black Specs Floor Tile with Yellow Mastic	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM_48	tile				Dissolved
47 - B	12"x12" Gray with Black Specs Floor Tile with Yellow Mastic	None Detected		100% Other	Black, Yellow Non Fibrous Homogeneous
71958445PLM 102	mixed mastic				Dissolved

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 Lab Order ID:
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 Analysis ID:
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Sample ID	Description	Ashastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
48 - A	12"x12" Gray with Black Specs Floor Tile with Yellow Mastic	None Detected		100% Other	Gray Non Fibrous Homogeneous
71958445PLM_49	tile				Dissolved
48 - B	12"x12" Gray with Black Specs Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_103	mastic				Dissolved
49	Tan with Red and White Specs Lenolium Sheeting	None Detected	25% Cellulose	75% Other	Beige Fibrous Homogeneous
71958445PLM_50					Teased, Dissolved
50	Tan with Red and White Specs Lenolium Sheeting	None Detected	25% Cellulose	75% Other	Beige Fibrous Homogeneous
71958445PLM_51					Teased, Dissolved
51	Brown Stone Pattern Lenolium Sheeting	25% Chrysotile	5% Cellulose	70% Other	Brown Fibrous Homogeneous
71958445PLM_52					Teased, Dissolved
52	Brown Stone Pattern Lenolium Sheeting	Not Analyzed			
71958445PLM_53					
53 - A	Brown Stair Tread with Yellow Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_54	stair tread				Dissolved
53 - B	Brown Stair Tread with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM 104	mastic				Dissolved

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Charmel Dozier (113)

Analyst

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By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 **Project:** 47:11425 300 Wythe Street Attn: Lauren Kesslak

Lab Order ID: 71958445 Analysis ID: 71958445 PLM Date Received: 1/22/2021 Date Reported: 1/26/2021

Sample ID	Description	A	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Asbestos	Components	Components	Treatment
54 (No 55) - A	Brown Stair Tread with Yellow Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_55	stair tread				Dissolved
54 (No 55) - B	Brown Stair Tread with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_105	mastic				Dissolved
56 (No 55) - A	4" Brown Cove Base with Yellow Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_56	cove base				Dissolved
56 (No 55) - B	4" Brown Cove Base with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_106	mastic				Dissolved
57 - A	4" Brown Cove Base with Yellow Mastic	None Detected		100% Other	Brown Non Fibrous Homogeneous
71958445PLM_57	cove base				Dissolved
57 - B	4" Brown Cove Base with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_107	mastic				Dissolved
58 - A	12"x12" White with Gray Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_58	tile				Dissolved
58 - B	12"x12" White with Gray Flecks Floor Tile with Yellow			070/ 0/1	Black, Yellow, Gra Non Fibrous

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3% Chrysotile

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Analyst

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97% Other

71958445PLM 108

Mastic

mixed mastic/leveling

Scientific Analytical Institute, Inc. 4604 Dundas Dr. Greensboro, NC 27407 (336) 292-3888

Homogeneous

Dissolved



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Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

 Lab Order ID:
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 Analysis ID:
 71958445\_PLM

 Date Received:
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Sample ID	Description	A sh sstar	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
59 - A	12"x12" White with Gray Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_59	tile				Dissolved
59 - B	12"x12" White with Gray Flecks Floor Tile with Yellow Mastic	Not Analyzed			
71958445PLM_109	mastic				
60 - A	12"x12" Black with White Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_60	tile				Dissolved
60 - B	12"x12" Black with White Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_110	mastic				Dissolved
61 - A	12"x12" Black with White Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_61	tile				Dissolved
61 - B	12"x12" Black with White Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_111	<i>mastic</i>				Dissolved
62	12"x12" Tan with Green and Brown Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Tan Non Fibrous Homogeneous
71958445PLM_62	tile only				Dissolved
63	12"x12" Tan with Green and Brown Flecks Floor Tile with Yellow Mastic	None Detected		100% Other	Tan Non Fibrous Homogeneous
71958445PLM 63	tile only				Dissolved

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Charmel Dozier (113)

Analyst

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By Polarized Light Microscopy EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E



Customer: ECS Mid-Atlantic, LLC 14026 Thunderbolt Place Suite 100 Chantilly, VA 20151 Project: 47:11425 300 Wythe Street Attn: Lauren Kesslak

 Lab Order ID:
 71958445

 Analysis ID:
 71958445\_PLM

 Date Received:
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 1/26/2021

Sample ID	Description	Ashestes Fibrous		Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
64 - A	12"x12" White with Light Tan Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_64	tile				Dissolved
64 - B	12"x12" White with Light Tan Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_112	mastic				Dissolved
65 - A	12"x12" White with Light Tan Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	White Non Fibrous Homogeneous
71958445PLM_65	tile				Dissolved
65 - B	12"x12" White with Light Tan Streaks Floor Tile with Yellow Mastic	None Detected		100% Other	Yellow Non Fibrous Homogeneous
71958445PLM_113	mastic				Dissolved
66	12"x12" Green Floor Tile with Yellow Mastic	None Detected		100% Other	Green Non Fibrous Homogeneous
71958445PLM_66	tile only				Dissolved
67	12"x12" Green Floor Tile with Yellow Mastic	None Detected		100% Other	Green Non Fibrous Homogeneous
71958445PLM_67	tile only				Dissolved
68	2'x4' White Mixed-Size Pin Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_68	-				Teased
69	2'x4' White Mixed-Size Pin Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM 69	-				Teased

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Sample ID	Description	Ashestas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
70	2'x4' White Pins and Worms Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_70					Teased
71	2'x4' White Pins and Worms Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_71	-				Teased
72	2'x4' White Small and Large Pins Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_72	-				Teased
73	2'x4' White Small and Large Pins Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_73	-				Teased
74	2'x2' White Textured Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_74	-				Teased
75	2'x2' White Textured Ceiling Tile	None Detected	35% Cellulose 35% Fiber Glass	30% Other	Tan Fibrous Homogeneous
71958445PLM_75					Teased
76	2'x2' White Deep Textured Ceiling Tile	None Detected	75% Fiber Glass	25% Other	Gray Fibrous Homogeneous
71958445PLM_76					Teased
77	2'x2' White Deep Textured Ceiling Tile	None Detected	75% Fiber Glass	25% Other	Gray Fibrous Homogeneous
71958445PLM 77	1				Teased

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Sample ID	Description	Ashastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
78	Tan Tank Breaching	None Detected	10% Cellulose 2% Other	88% Other	Tan Fibrous Homogeneous
71958445PLM_78	-				Teased
79	Tan Tank Breaching	None Detected	10% Cellulose 2% Other	88% Other	Tan Fibrous Homogeneous
71958445PLM_79	-				Teased
80	Tan Tank Breaching	None Detected	10% Cellulose 2% Other	88% Other	Tan Fibrous Homogeneous
71958445PLM_80	-				Teased
81	White Bridging Mastic	None Detected		100% Other	Green, White Non Fibrous Homogeneous
71958445PLM_81					Dissolved
82	White Bridging Mastic	None Detected		100% Other	Green, White Non Fibrous Homogeneous
71958445PLM_82	-				Dissolved
83	Black Exterior Window Caulk	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_83	-				Dissolved
84	Black Exterior Window Caulk	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_84	-				Dissolved
85	Black Exterior Door Caulk	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM 85					Dissolved

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Sample ID	Description	Ashastas	Fibrous	Non-Fibrous	Attributes
Lab Sample ID	Lab Notes	Aspestos	Components	Components	Treatment
86	Black Exterior Door Caulk	None Detected		100% Other	Black Non Fibrous Homogeneous
71958445PLM_86					Dissolved

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Scientific Analytical Institute, Inc. 4604 Dundas Dr. Greensboro, NC 27407 (336) 292-3888

Analyst

Client	ECS Mid-Atlantic 11 C	"Instructions"	
Contact:	Lauren har al	Use Calumn 'B" for your contact info	
Address:	14026 Tanalarati Las Puls		
Phone: Fax:	(703)-471-8400	To See an Example Click the	
Email:	ikesslak@ecslimited.com		
		Enter samples between "<<" and ">>"	
Project	47:11425 303 Vrg mit 3 646	Begin Samples with a "<< "above the first sample and and with a ">>" beinw the last sample	Scientific CAL
			Institute
Client Notes:		Only Enter your date on the first sheet "Sheet1"	
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## Appendix V: EPA Generator ID Form 8700-12

### United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM



### 1. Reason for Submittal (Select only one.)

Obtaining or updating an EPA ID number for an on-going regulated activity that will continue for a period of time. (Includes HSM activity)
Submitting as a component of the Hazardous Waste Report for (Reporting Year)
Site was a TSD facility and/or generator of > 1,000 kg of hazardous waste, > 1 kg of acute hazardous waste, or > 100 kg of acute hazardous waste spill cleanup in <b>one or more months of the reporting year</b> (or State equivalent LQG regulations)
Notifying that regulated activity is no longer occurring at this Site
Obtaining or updating an EPA ID number for conducting Electronic Manifest Broker activities
Submitting a new or revised Part A Form

#### 2. Site EPA ID Number

### 3. Site Name

### 4. Site Location Address

Street Address		
City, Town, or Village		County
State	Country	Zip Code

### 5. Site Mailing Address

Street Address				
City, Town, or Village				
State	Country	Zip Code		

#### 6. Site Land Type

Private	County	District	Federal	Tribal	Municipal	State	Other
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### 7. North American Industry Classification System (NAICS) Code(s) for the Site (at least 5-digit codes)

A. (Primary)	С.
В.	D.

Same as Location Address

8. Site C	Contact Information	Same as Location Address									
	First Name	MI	Last Name								
	Title										
	Street Address										
	City, Town, or Village										
	State	Country	Zip Code								
	Email										
	Phone	Ext	Fax								

### 9. Legal Owner and Operator of the Site

A. Name of Site's Legal Owner	Same as Location Address				
Full Name		Date Became Owner (mm/dd/yyyy)			
Owner Type					
Private County District	Federal Tribal	Municipal State Other			
Street Address					
City, Town, or Village					
State	Country	Zip Code			
Email					
Phone	Ext	Fax			
Comments					

### B. Name of Site's Legal Operator

B. Name of Site's Legal Operator	Same as Location Address			
Full Name	Date Became Operator (mm/dd/yyyy)			
Operator Type				
Private County District	Federal Tribal	Municipal State Other		
Street Address				
City, Town, or Village				
State	Country	Zip Code		
Email				
Phone	Ext	Fax		
Comments				

EPA ID Number
---------------

#### **10.** Type of Regulated Waste Activity (at your site)

Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

#### A. Hazardous Waste Activities

Y N	1. Gen	erator of H	azardous Waste—If "Yes", mark only one of the following—a, b, c						
		a. LQG	<ul> <li>-Generates, in any calendar month (includes quantities imported by importer site)</li> <li>1,000 kg/mo (2,200 lb/mo) or more of non-acute hazardous waste; or</li> <li>- Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo</li> <li>(2.2 lb/mo) of acute hazardous waste; or</li> <li>- Generates, in any calendar month or accumulates at any time, more than 100 kg/mo</li> <li>(220 lb/mo) of acute hazardous spill cleanup material.</li> </ul>						
b. SQG			100 to 1,000 kg/mo (220-2,200 lb/mo) of non-acute hazardous waste and no more than 1 kg (2.2 lb) of acute hazardous waste and no more than 100 kg (220 lb) of any acute hazardous spill cleanup material.						
c. VSQG Less than or equal to 100 kg/mo (220 lb/mo) of non-acute hazardous waste.									
If "Yes" above	e, indicat	e other gen	erator activities in 2 and 3, as applicable.						
Y N	Y N 2. Short-Term Generator (generates from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.								
Y N	3. Mix	ed Waste (h	nazardous and radioactive) Generator						
Y N	4. Trea these a	ater, Storer activities.	or Disposer of Hazardous Waste-Note: A hazardous waste Part B permit is required for						
Y N	5. Rece	eives Hazar	dous Waste from Off-site						
Y N	6. Recy	cler of Haza	ardous Waste						
		a. Recycle	r who stores prior to recycling						
	b. Recycler who does not store prior to recycling								
Y N	7. Exen	npt Boiler a	nd/or Industrial Furnace—If "Yes", mark all that apply.						
		a. Small Q	uantity On-site Burner Exemption						
		b. Smeltin	g, Melting, and Refining Furnace Exemption						

**B. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g. D001, D003, F007, U112). Use an additional page if more spaces are needed.

**C. Waste Codes for State Regulated (non-Federal) Hazardous Wastes.** Please list the waste codes of the State hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.



EPA ID Number						

#### 11. Additional Regulated Waste Activities (NOTE: Refer to your State regulations to determine if a separate permit is required.) A. Other Waste Activities

Y N	1. Tran	sporter of Hazardous Waste—If "Yes", mark all that apply.					
		a. Transporter					
		b. Transfer Facility (at your site)					
N Y	2. Und	erground Injection Control					
Y N	3. Unit	ed States Importer of Hazardous Waste					
Y N	N 4. Recognized Trader—If "Yes", mark all that apply.						
		a. Importer					
		b. Exporter					
N Y	5. Import that ap	orter/Exporter of Spent Lead-Acid Batteries (SLABs) under 40 CFR 266 Subpart G—If "Yes", mark all ply.					
		a. Importer					
		b. Exporter					

### **B. Universal Waste Activities**

Y N	1. Lar apply	ge Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) - If "Yes" mark all that Note: Refer to your State regulations to determine what is regulated.
		a. Batteries
		b. Pesticides
		c. Mercury containing equipment
		d. Lamps
		e. Other (specify)
		f. Other (specify)
		g. Other (specify)
Y N	2. D activit	estination Facility for Universal Waste Note: A hazardous waste permit may be required for this ty.

### C. Used Oil Activities

Y N 1. Use	ed Oil Transporter—If "Yes", mark all that apply.
	a. Transporter
	b. Transfer Facility (at your site)
Y N 2. Use	ed Oil Processor and/or Re-refiner—If "Yes", mark all that apply.
	a. Processor
	b. Re-refiner
Y N 3. Off	-Specification Used Oil Burner
Y N 4. Use	ed Oil Fuel Marketer—If "Yes", mark all that apply.
	a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
	b. Marketer Who First Claims the Used Oil Meets the Specifications

EPA ID Number							

**12. Eligible Academic Entities with Laboratories**—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR 262 Subpart K.

Y N A. Opting into or currently operating under 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories—If "Yes", mark all that apply. Note: See the item-by-item instructions for definitions of types of eligible academic entities.					
		1. College or University			
		2. Teaching Hospital that is owned by or has a formal written affiliation with a college or university			
		3. Non-profit Institute that is owned by or has a formal written affiliation with a college or univer-			
Y N	B. Wit	hdrawing from 40 CFR 262 Subpart K for the management of hazardous wastes in laboratories.			

#### 13. Episodic Generation

γ

Y N Are

Are you an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more than 60 days, that moves you to a higher generator category. If "Yes", you must fill out the Addendum for Episodic Generator.

#### 14. LQG Consolidation of VSQG Hazardous Waste

N Are you an LQG notifying of consolidating VSQG Hazardous Waste Under the Control of the Same Person pursuant to 40 CFR 262.17(f)? If "Yes", you must fill out the Addendum for LQG Consolidation of VSQGs hazardous waste.

### 15. Notification of LQG Site Closure for a Central Accumulation Area (CAA) (optional) OR Entire Facility (required)

Y N LQG Site Closure of a Central Accumulation Area (CAA) or Entire Facility.
A. Central Accumulation Area (CAA) 🕞 Entire Facility
B. Expected closure date: mm/dd/yyyy
C. Requesting new closure date: mm/dd/yyyy
D. Date closed : mm/dd/yyyy 1. In compliance with the closure performance standards 40 CFR 262.17(a)(8) 2. Not in compliance with the closure performance standards 40 CFR 262.17(a)(8)

#### 16. Notification of Hazardous Secondary Material (HSM) Activity

_YN	A. Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop manag- ing hazardous secondary material under 40 CFR 260.30, 40 CFR 261.4(a)(23), (24), or (27)? If "Yes", you must fill out the Addendum to the Site Identification Form for Managing Hazardous Secondary Material.
	B. Are you notifying under 40 CFR 260.43(a)(4)(iii) that the product of your recycling process has levels of hazardous constituents that are not comparable to or unable to be compared to a legitimate product or intermediate but that the recycling is still legitimate? If "Yes", you may provide explanation in Comments section. You must also document that your recycling is still legitimate and maintain that documentation on site.

#### **17.** Electronic Manifest Broker

Y [] N	Are you notifying as a person, as defined in 40 CFR 260.10, electing to use the EPA electronic manifest system to obtain, complete, and transmit an electronic manifest under a contractual relationship with a hazardous waste generator?
--------	--

EPA ID Number						

18. Comments (include item number for each comment)


**19. Certification** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. Note: For the RCRA Hazardous Waste Part A permit Application, all owners and operators must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Printed Name (First, Middle Initial Last)	Title
Email	<u> </u>
Signature of legal owner, operator or authorized representative	Date (mm/dd/yyyy)
Signature of legal owner, operator or authorized representative Printed Name (First, Middle Initial Last)	Date (mm/dd/yyyy) Title

### ADDENDUM TO THE SITE IDENTIFICATION FORM:

### NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY



#### **ONLY fill out this form if:**

- You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(30), 261.4(a)(23), (24), or (27) (or state equivalent; See https://www.epa.gov/epawaste/hazard/dsw/ statespf.htm for a list of eligible states; AND
- You are or will be managing excluded HSM in compliance with 40 CFR 260.30, 261.4(a)(23), (24), or (27) (or state equivalent) or have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section. Note: If your facility was granted a solid waste variance under 40 CFR 260.30 prior to July 13, 2015, your management of HSM under 40 CFR 260.30 is grandfathered under the previous regulations and you are not required to notify for the HSM management activity excluded under 40 CFR 260.30.

Facility will begin managing excluded HSM as of (mm/dd/yyyy).

1. Reason for Notification (Include dates where requested)

Facility is <u>still managing</u> excluded HSM/re-notifying as required by March 1 of each even-numbered year.

Facility has <u>stopped</u> managing excluded HSM as of \_\_\_\_\_\_ (mm/dd/yyyy) and is notifying as required.

**2. Description of Excluded HSM Activity**. Please list the appropriate codes (see Code List section of the instructions) and quantities, in short tons, to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

A. Facility Code	B. Waste Code(s) for HSM	C. Estimate Short Tons of excluded HSM to be managed annually	D. Actual Short Tons of excluded HSM that was managed during the most recent odd-numbered year	E. Land- based Unit Code

### ADDENDUM TO THE SITE IDENTIFICATION FORM:





### ONLY fill out this form if:

• You are an SQG or VSQG generating hazardous waste from a planned or unplanned episodic event, lasting no more then 60 days, that moves the generator to a higher generator category pursuant to 40 CFR 262 Subpart L. Note: Only one planned and one unplanned episodic event are allowed within one year; otherwise, you must follow the requirements of the higher generator category. Use additional pages if more space is needed.

Episodic Event						
1. Planned		2. Unplanned				
Excess chemical inventory removal Tank cleanouts Short-term construction or demolitior Equipment maintenance during plant Other	) shutdowns	Accidental spills Production process upsets Product recalls "Acts of nature" (Tornado, hurricane, flood, etc.)				
3. Emergency Contact Phone	4. Emergency Conta	ict Name				
5. Beginning Date	(mm/dd/yyyy)	6. End Date (mm/dd/yyyy)				

#### Waste 1

7. Waste Descriptio	n	8. Estimated Quant	ity (in pounds)		
9. Federal and/or S	tate Hazardous Wast	e Codes		-	

#### Waste 2

7. Waste Descriptio	n	8. Estimated Quanti	ty (in pounds)
9. Federal and/or S	tate Hazardous Wast		

### Waste 3

7. Waste Descriptio	n	8. Estimated Quantity (in pounds)			
9. Federal and/or S	tate Hazardous Wast	e Codes			

### ADDENDUM TO THE SITE IDENTIFICATION FORM:

### LQG CONSOLIDATION OF VSQG HAZARDOUS WASTE

### ONLY fill out this form if:

• You are an LQG receiving hazardous waste from VSQGs under the control of the same person. Use additional pages if more space is needed.

VSQG 1		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		

VSQG 2		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		

VSQG 3		
1. EPA ID Number (if assigned)	2. Name	
3. Street Address		
4. City, Town, or Village	5. State	6. Zip Code
7. Contact Phone Number	8. Contact Name	
9. Email		



## Appendix VI: Certifications/ Licenses

## DPOR License Lookup License Number 3355000975

License De	etails
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Name	BOURNE, CATHERINE GRACE
License Number	3355000975
License Description	Lead Inspector License
Rank	Lead Abatement Inspector
Address	ALEXANDRIA, VA 22304
Initial Certification Date	2019-03-11
Expiration Date	2021-03-31

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## DPOR License Lookup License Number 3303004293

### License Details

NameBOURNE, CATHERINE GRACELicense Number3303004293License DescriptionAsbestos Inspector LicenseRankAsbestos InspectorAddressALEXANDRIA, VA 22304Initial Certification Date2017-07-18Expiration Date2021-07-31

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