

April 21, 2026

Orbach Affordable Housing Solutions (OAHS)
980 Sylvan Avenue
Englewood Cliffs, NJ 07632



GILL GROUP

Attention: Jaime

Subject: Asbestos Operation and Maintenance Plan of:

Manning Gardens
214 Alfred Henry Street
Manning, South Carolina 29102
ET928O2860

Dear : Mr. Birman

Gill Group, Inc (Gill) is pleased to provide the attached Asbestos Operations & Maintenance Plan for the referenced site. Details regarding the operation and management of identified asbestos containing materials is outlined in the report. If you have any questions or comments, please contact the undersigned Gill Group participants at (800) 428-3320.

Thank you,

Quincy Taylor
Project Manager

Kristin Tate
Director of HUD Services

Asbestos Operations & Maintenance Plan

GG PROJECT NO.: ET928O2860

REPORT DATE: April 21, 2026
SITE VISIT DATE: March 25, 2026

Manning Gardens
214 Alfred Henry Street
Manning, South Carolina 29102

PREPARED FOR:
Orbach Affordable Housing Solutions (OAHS)
980 Sylvan Avenue
Englewood Cliffs, NJ 07632



GILL GROUP
NATIONWIDE DUE DILIGENCE EXPERTS





Table of Contents

1.0	ASBESTOS OPERATIONS & MAINTENANCE (O&M POLICY)	5
1.1	Mandatory Compliance	6
1.2	Activities Covered by this Policy	6
1.3	Dealing with Existing Asbestos Materials	7
1.4	Minor Asbestos Activities	7
1.5	Major Asbestos Activities	7
2.0	MANDATORY REQUIREMENTS AND GUIDANCE	7
2.1	New Material Installation Policy	7
2.2	Competent Person Supervision	7
2.3	Inventory of ACBM/PACBM Locations	8
2.3.1	Default Section Title	8
2.4	Labeling of ACBM/PACBM (Communication of Hazards)	9
2.5	EPA/OSHA/Notification Requirements	9
2.6	Emergency Spills (Releases) and Notifications	9
2.7	Waste Management	10
2.8	Training Requirements	10
2.9	Respiratory Protection	11
2.10	Communication of Hazards	12
2.11	Recordkeeping	12
3.0	CONTROL METHODS FOR DEMOLITION, REMOVAL, OR RENOVATION	13
3.1	Work Practice Controls and Measures	13
3.2	Regulated Area Requirements	14
3.3	Methods of Compliance	14
3.4	Prohibitions	15
3.5	Control Measures for Class III Operations and Maintenance Activities	15
3.6	Control Measures for Class IV Activities	15
3.7	Hygiene Levels	16
4.0	EMERGENCY RESPONSE PROCEDURES	16
4.1	General Guidance if Emergency Spill or Fiber Release Occurs	16
4.2	Containment of Emergency Friable ACBM Spill or Release	17
4.3	Minor ACBM Spill or Release Emergency Procedures	17
4.4	Major ACBM Spill or Release Emergency Procedures	19
4.5	Reporting a Spill/Release Incident - Recordkeeping	19



5.0	EQUIPMENT AND MATERIALS REQUIRED BY THE O&M PROGRAM	19
5.1	O&M Equipment and Materials Supply List	19
6.0	DISCLAIMERS & LIMITATIONS	20

TABLE OF APPENDICES

Appendix: A: General Safety Considerations
Appendix: B: Air Monitoring Types and Procedures
Appendix: C: Abatement Management
Appendix: D: Documentation of Training
Appendix: E: Maintenance Work Authorization Form
Appendix: F: Job Request Form (Maintenance Work)
Appendix: G: Cleanup & Decontamination Form
Appendix: H: Fiber Release Incident Report
Appendix: I: Evaluation of Work Affecting ACM
Appendix: J: ACM Reports



INTRODUCTION

Gill Group, Inc (Gill) has prepared this Operations and Maintenance (O&M) Manual for the exclusive use of Orbach Affordable Housing Solutions (OAHS) for Manning Gardens located at 214 Alfred Henry Street in Manning, South Carolina.

Gill conducted an inspection of the property for suspect asbestos containing materials (ACM) on March 25, 2026. The findings of the ACM survey identified ACMs; which necessitated the development of this O&M Manual. The purpose of the O&M Manual is to provide the following:

- To provide a program where proper work practices are recommended to maintain ACM or presumed asbestos containing material (PACM) in good condition;
- Ensure proper cleanup of released asbestos fibers; and
- Prevent a release of fibers by minimizing and controlling friable ACM disturbance or damage and monitor ACM or PACM over time.

The Manning Gardens Asbestos Program Manager (APM) Designated Person is:

Name:

Office Number:

Emergency Number/Cell:

The APM/Designated Person and all members of the Emergency Response Team must have (as a minimum) the Two-hour OSHA Class IV Asbestos Awareness Training and current annual updates in order to function as active Team Members. Their accreditations must be current as required by OSHA and AHERA regulations.

The Manning Gardens Asbestos Emergency Response Team Members are:

Name:

Name:

Office Number:

Office Number:

Emergency Number/Cell:

Emergency Number/Cell:

1.0 ASBESTOS OPERATIONS & MAINTENANCE (O&M POLICY)



1.1 Mandatory Compliance

Compliance with this policy is mandatory. It establishes the control and management of asbestos for all operations at Manning Gardens facilities. It provides compliance advice adhering to current regulations established by the following Federal and State regulatory bodies:

- OSHA's Construction Asbestos Standard (29 CFR 1926.1101).
- US EPA Asbestos Hazard Emergency Response Act (AHERA)
- US EPA's National Emissions Standard for Hazardous Air Pollutants (NESHAP)
- Asbestos Standard (40 CFR Part 61).
- USEPA's Model Accreditation Plan-Interim Final Rule (40 CFR 172.101). (Training)
- US Department of Transportation (DOT) Hazardous Materials Regulation (49 CFR 172.101).

1.2 Activities Covered by this Policy

This Policy applies to all areas at Manning Gardens as well as all Contractors and Consultants performing asbestos related activities on behalf of the Owner. Each activity will be conducted according to Federal Occupational Safety and Health Administration (OSHA), U. S. Environmental Protection Agency (EPA) and Air Division Environmental Protection Division (EPD) regulations and procedures when performing the following asbestos related activities:

1.2.1. Construction, alteration, repair, maintenance, or renovation of structures, substrates or portions thereof that contain asbestos. Minor repairs and maintenance shall be conducted by Class III trained and qualified in-house O&M employees (Class III work) or by qualified and licensed Asbestos Abatement Contractors. Larger projects must be performed by licensed and qualified Asbestos Abatement Contractors.

1.2.2. Asbestos spill/emergency cleanup. Stabilization and sealing off area and minor clean-up shall be conducted by Class III trained and qualified in-house employees (Class III work) or by licensed and qualified Asbestos Abatement Contractors.

1.2.3. Transportation, disposal, storage, containment of and housekeeping activities involving asbestos.

1.2.4. Removal or encapsulation of materials containing asbestos – By licensed, qualified Asbestos Abatement Contractor.



1.2.5. Demolition or salvage of structures where asbestos is present– By licensed, qualified Asbestos Abatement Contractor.

1.2.6. Installation of products that contain asbestos. (Not recommended but covered by Regulation.)

1.3 Dealing with Existing Asbestos Materials

Existing asbestos materials (ACBM) on Manning Gardens properties must be identified and maintained in a good state of repair and regularly inspected.

1.4 Minor Asbestos Activities

Minor O&M procedures, minor emergency spills, or bulk sampling shall be handled by properly trained and accredited employees on the in-house team, or by qualified vendor personnel as determined by the Asbestos Program Manager (APM). (See [Section 4.3.](#), Minor ACBM Spill or Release Procedures).

1.5 Major Asbestos Activities

Major asbestos abatement projects shall require the use of outside licensed and qualified contractors.

2.0 MANDATORY REQUIREMENTS AND GUIDANCE

2.1 New Material Installation Policy

2.1.1. Only asbestos-free products, formerly by MSDS, now SDS may be used for new installations or to replace existing asbestos containing materials that have been removed.

2.2 Competent Person Supervision

1.2.1. Construction, alteration, repair, maintenance, or renovation of structures, substrates or portions thereof that contain asbestos. Minor repairs and maintenance shall be conducted by Class III trained and qualified in-house O&M employees (Class III work) or by qualified and licensed Asbestos Abatement Contractors. Larger projects must be performed by licensed and qualified Asbestos Abatement Contractors.

1.2.2. Asbestos spill/emergency cleanup. Stabilization and sealing off area and minor clean-up shall be conducted by Class III trained and qualified in-house employees (Class III work) or by licensed and qualified Asbestos Abatement Contractors.



1.2.3. Transportation, disposal, storage, containment of and housekeeping activities involving asbestos.

1.2.4. Removal or encapsulation of materials containing asbestos – By licensed, qualified Asbestos Abatement Contractor.

1.2.5. Demolition or salvage of structures where asbestos is present– By licensed, qualified Asbestos Abatement Contractor.

1.2.6. Installation of products that contain asbestos. (Not recommended but covered by Regulation.)

2.3 Inventory of ACBM/PACBM Locations

Manning Gardens has completed the process of inventorying ACBM, suspect ACBM and PACBM locations at the structure. Bulk samples have been collected in random areas and analyzed at this time. The materials known or assumed to contain asbestos are summarized in the table below:

Table 1 - Positive Homogenous Areas

HA	Sample Description	Type	% ACM via PLM	%ACM via TEM	% ACM via Point Count	Friable	Estimated Quantity
19 A-C	Bottom Layer 12x12 VCT	M	2%	5.1%	N/A	None identified	Throughout Units
21 A-C	Bottom Layer 12x12 VCT	M	2%	9.1%	N/A	None identified	Throughout Units

2.3.1 Default Section Title

2.3.1 Where there is no information on what materials are suspect or known ACBM, trained and accredited inspection personnel are required to take bulk samples of suspect materials and PACBM to determine status before any renovation or demolition work begins. Otherwise, it must be assumed that all suspect ACM, including insulation materials, surfacing materials, and roofing materials contain asbestos, and proper handling techniques for asbestos must be used. The APM will arrange for additional sample collection when required.

Note: The requirements of AHERA only cover ACBM & PACBM interior to K-12 school facilities. Exterior suspect materials must be sampled and analyzed in accordance with EPA NESHAP regulations prior to renovations & demolitions.

2.3.2 All bulk samples taken must be sent to an approved laboratory.



2.3.3 On a twice annual basis, the APM (Designated Person) or his designee will inspect every identified ACBM, suspect ACBM or PACBM to determine its continued integrity. If it has become damaged or deteriorated, it is to be repaired, removed, or otherwise abated to return the area to a safe condition for its intended use. A semi-annual inspection form is provided in the appendices.

2.4 Labeling of ACBM/PACBM (Communication of Hazards)

2.4.1 OSHA requires building and facility Owners to post signs interior to mechanical/boiler rooms where ACBM/PACBM has been identified. Where feasible, labels will be directly attached on or adjacent to Thermal System Insulation (TSI) or other ACBM/PACBM to warn employees and vendors against unauthorized disturbance. The following language is suggested for such signs and labels, and are available from safety/supply stores:

DANGER ASBESTOS

CANCER AND LUNG DISEASE HAZARD AUTHORIZED PERSONNEL ONLY

AVOID CREATING DUST

2.5 EPA/OSHA/Notification Requirements

2.5.1. EPA NESHAP - If disturbance of friable asbestos of a certain quantity will occur to facilitate renovation, abatement of such RACBM (regulated ACBM, referring to friable ACBM) must be scheduled with advance notification of at least 10 working days prior to such abatement. Trigger quantities are amounts greater than 260 linear feet, 160 square feet, or 35 cubic feet of RACBM for the EPA NESHAP.

2.5.2. EPA NESHAP also requires notification for all demolition projects, regardless of size and regardless of whether ACBM/PACM is known, presumed, or present.

Note: The applicable EPA NESHAP regulations must be consulted by the APM prior to any disturbance, removal, or handling of RACM on the property.

2.6 Emergency Spills (Releases) and Notifications

2.6.1. Emergency spills (releases) or accidental ACBM disturbance sometimes requires that asbestos work be performed immediately to maintain building operations and to prevent other health or safety hazards. Emergency abatement work is acknowledged in regulations and is permitted under certain circumstances; however, all emergency asbestos work must be supervised by a Competent Person (one who is properly trained and Accredited to Supervise Asbestos Abatement activities).



2.6.2. The Asbestos Program Manager (Designated Person) should always be contacted if there is such a spill or release. Based on the type, condition and extent of the dislodged material, the Designated Person can determine if the cleanup should be classified as a Class I, II, III, or IV job.

2.6.3. If the amount of disturbed or damaged ACBM/PACBM exceeds 260 linear feet, 35 cubic feet, or 160 square feet, the MO DNR must be notified after the fact of the amount abated and details of the cleanup.

2.6.4. Small quantities (less than that mentioned in [Section 2.6.3](#)) of ACBM/ PACBM may be removed by in-house Class III O&M trained personnel to facilitate maintenance or clean up small amounts of materials from an emergency spill. Alternately, the O&M APM (Designated Person) may require that such work be performed by a licensed asbestos abatement contractor.

2.7 Waste Management

2.7.1. According to the EPA NESHAP and OSHA, ACBM must be collected and sealed in air-tight bags or handled by other methods deemed appropriate and allowed by the regulations and by the Competent Person, as soon as possible after removal.

2.7.2. When placing asbestos waste in a bag for disposal, the waste must be thoroughly wetted, the bag must be evacuated of all air with a HEPA vacuum, and the bag must be twisted at the top, folded over on itself (goosenecked), and taped carefully to ensure it will not leak during transport.

2.7.3. All asbestos waste must be properly labeled. If individual bags are collected into drums, each bag, as well as the drum must have warning labels as follows:

DANGER CONTAINS ASBESTOS AVOID CREATING DUST
CANCER AND LUNG DISEASE HAZARD

In addition, the name and address of the Generator of the waste ACBM (Manning Gardens) must also be on each bag, drum, etc.

2.7.4. Waste Transportation - All containers must be labeled as described above.

2.7.5. Vehicles used to transfer ACBM must be marked on the exterior as containing Class 9 materials.

2.7.6. Waste Manifests - A waste manifest or Waste Shipment Record (WSR) must accompany the waste and be given to the landfill operator. The operator will return a filled-out WSR to the Generator (Manning Gardens) within 30 days. If not received within 35 days, the Generator must contact the landfill or transporter to inquire about the delay. If a copy is not received within 45 days, the Generator must report it in writing to the EPA.

2.8 Training Requirements

2.8.1. A training program will be instituted for selected Manning Gardens employees to qualify them to perform OSHA Class III or IV work operations, and for those whose work duties may bring them into proximity with identified ACBM. Manning Gardens employees will not perform OSHA Class I or Class II operations.



2.8.2. Training shall be provided prior to the initial assignment and a refresher course provided at least annually thereafter.

2.8.3. Training for Class III operations (encompassing this O&M Program) requires 16 hours of training. The two-day OSHA Class III Asbestos O&M Training is intended for an employee who may act as an Asbestos Program Manager and Competent Person, and all employees who may perform OSHA Class III Asbestos Abatement activities. This is a training requirement under the OSHA Asbestos Regulation 1926.1101, dated 1994. It is a requirement of this training that specific information concerning the types and locations of ACBM on the property be provided. The AHERA Designated Person requires less training than described here to function in their job. (Some Manning Gardens employees may be selected for this training.)

2.8.4. Training for Class IV operations (for those working around or coming into contact with ACBM but not disturbing it) requires 2 hours of Asbestos Awareness Training. The two-Hour OSHA Class IV Asbestos Awareness Training is intended for all employees whose job duties require them to have a knowledge of the specific ACBM's present on the property, or who may perform custodial or other duties requiring them to come into contact with ACBM but not disturb it. Individuals with Class IV training may actually contact ACBM previously disturbed, such as in cleanup activities, or may direct employees who may be likely to come in direct contact with installed ACBM. This is a level of training described in detail in the OSHA Asbestos Regulation 1926.1101, dated 1994. This is appropriate training for the AHERA Designated Person. (Some Manning Gardens employees will require this training.)

2.8.5. Refer to OSHA 29 CFR 1926.1101, Section (K) (9) for more detailed guidance on required training.

2.9 Respiratory Protection

2.9.1. It is the policy of Manning Gardens that Class I, II, and III asbestos work will be performed only by a licensed and qualified asbestos abatement contractor. No Manning Gardens employee will be required to wear a respirator under this O&M Program.

Should this policy change, training, fit testing and medical surveillance that may be required for such Manning Gardens employees are not included in this O&M Program Manual and will be described in detail in a separate, written Respirator Program provided by Manning Gardens Management as may be required

2.9.2. Manning Gardens employees who have had Class IV two-hour Awareness Training may perform certain activities such as contacting ACBM without disturbing it, or minor clean-up around ACBM provided they are not exposed to ACBM in the air at or above the Permissible Exposure Limit (PEL) or Short-term Exposure Limit (STEL). These activities may be performed without special respiratory protection by employees with Class IV Awareness Training. It is also advisable for selected Management personnel who manage these employees to have this Class IV training at a minimum.



2.10 Communication of Hazards

(Refer to 29 CFR 1926.1101, Section (k) for full OSHA Requirements for Communication of Hazards and the duties of Building and Facility Owners.)

2.10.1 The following persons must be informed of the presence, location, and quantity of ACBM and PACBM at their work sites on the Manning Gardens property.

- Prospective employers bidding on work at the property.
- Employees of the Owner working on the property.
- Tenants leasing or renting areas of the property that contain ACBM or PACBM

2.10.2. It is highly recommended that separate legal advice be sought in writing sections of any lease agreements entered into by Manning Gardens based on ACBM and PACBM known to be present on the property. This language should be written to provide legal protection for both the lessee and lessor. (This is not anticipated as of the date of issue of this O&M Program.)

2.10.3. ACBM identified in mechanical rooms, boiler rooms and other areas of buildings requiring regular maintenance by employees or vendors must be labeled for easy identification. This pertains primarily to TSI, but other ACBM materials may be included based on the APMs judgement. (See [Section 2.4](#). Labeling of ACBM/PACBM above).

2.11 Recordkeeping

Various records are required by the OSHA Regulations to be kept for specified periods of time. Refer to Section (n) Recordkeeping in the OSHA Regulations. In addition, for reasons of legal protection from possible civil suits, the Owner's (Manning Gardens) Legal Counsel may recommend additional records be developed and maintained.

2.11.1. Some (but not all) of the required records to be kept by the Owner include:

- Objective (analytical) data concerning asbestos exposure through air monitoring that ACBM left in place will not exceed either the PEL or the excursion Limit (STEL) for asbestos under expected conditions of normal use. Such records to be kept a minimum of 30 years.



- Objective (analytical) data concerning asbestos exposure through air monitoring during any abatement activity occurring on site to ensure proper respirator protection for exposed employees, and to ensure exposure levels below the PEL prior to reoccupation of areas or buildings. Such records to be kept for a minimum of 30 years.
- Medical surveillance of employees working with ACBM or PACBM and/or wearing negative pressure respirators. All such records must be kept for the duration of employment plus 30 years.
- Training records – Training records must be kept for one year beyond the last date of employment by that employer. It is recommended they be maintained beyond the minimum of one year.
- Survey data generated that specifically rebuts Presumed Asbestos Containing Material (PACBM) and Suspect ACBM remaining in place. To be kept during the useful life of the facility.
- All records associated with contracted asbestos abatement, including government notifications and waste shipment records of ACBM taken to landfills.

2.11.2. All records should be maintained by the Owner of the property (Manning Gardens) and transferred to any successive Owners of the property or parts of the property.

3.0 CONTROL METHODS FOR DEMOLITION, REMOVAL, OR RENOVATION

3.1 Work Practice Controls and Measures

Specific work practices are required when asbestos containing materials are disturbed. This is to prevent exposure to employees as well as others in the vicinity, and to prevent environmental releases of asbestos. The type and degree of these controls will vary depending on the type of ACBM being worked on, the amount of ACBM being abated, and the purpose for which abatement is being performed. The answers to these questions will determine which of the four classes of abatement a project will fall under (Classes I, II, III or IV) as described in the OSHA Regulations.



3.2 Regulated Area Requirements

3.2.1. All Class I, II, and III jobs require establishing a regulated area. All other asbestos work must also be within a regulated area where airborne asbestos exceeds or may be expected to exceed the PEL.

3.2.2. Warning signs must be posted as follows at all entrances to regulated areas:

DANGER AIRBORNE ASBESTOS FIBERS

CANCER AND LUNG DISEASE HAZARD AUTHORIZED PERSONNEL ONLY

RESPIRATORS AND PROTECTIVE CLOTHING REQUIRED

3.2.3. Access is limited to Competent Persons as defined by OSHA and others trained and authorized to be in a Regulated Area, and “official visitors” such as government regulatory personnel.

3.2.4. All personnel entering the Regulated Area must be supplied with an appropriate respirator (if required) based on an initial exposure assessment by a Competent Person.

3.2.5. Personnel are not allowed to eat, drink, smoke, chew tobacco or gum or apply cosmetics in a Regulated Area.

3.2.6. All work must be supervised by Competent Persons as defined in the OSHA regulation.

3.3 Methods of Compliance

Manning Gardens will use the following engineering controls and work practices regardless of the levels of exposure:

- Only vacuum cleaners equipped with HEPA filters will be used to collect dust and debris containing ACBM/PACBM.
- Wet methods or wetting agents will be used to control exposures during asbestos handling, mixing, removal, cutting, application and cleanup except when they prove infeasible due to the creation of electrical hazards, equipment malfunction or slipping hazards during roof removal operations. Dry removal for these reasons must have written prior authorization by the controlling governmental agency.
- Prompt cleanup and disposal of asbestos wastes in leak tight containers (bags or drums) is required.



3.4 Prohibitions

These methods must NOT be employed:

- High speed abrasive disc saws or other mechanical equipment that will make ACBM friable and that are not equipped with point of cut ventilator enclosures with HEPA filtered exhaust air.
- Compressed air to remove asbestos dust or debris unless used in conjunction with an enclosed ventilation system.
- Dry sweeping, shoveling or other dry cleanup of asbestos dust and debris.
- Employee rotation as a means of reducing exposure to asbestos.

3.5 Control Measures for Class III Operations and Maintenance Activities

- OSHA Class III work is defined as activities involving intentional disturbances of small amounts of ACBM/PACBM to facilitate repair and maintenance, and that will generate no more asbestos waste than a single standard waste bag will hold safely (defined as approximately 1/3 to 1/2 full).
- Class III work must be supervised by a Competent Person and be carried out by employees who have received a minimum of 16-hour Class III Training.
- Wet methods must be used to reduce dust generation and release.
- Plastic barriers and respirators will be employed if exposure is expected to meet or exceed the PEL during the project. If a negative exposure assessment (NEA) has been completed, the Competent Person may vary these requirements consistent with protecting human health.

3.6 Control Measures for Class IV Activities

- Class IV work activities consist of maintenance and custodial-related work during which employees may contact ACBM or PACBM as a result of previously performed Class I, II or III activities, or in cleaning up after a small accidental disturbance, but do not intentionally disturb in-place material.
- Class IV personnel must receive OSHA 2-hour asbestos awareness training.
- If required to work in a regulated area, respirators must be worn unless a NEA has shown exposure levels below the PEL.



3.7 Hygiene Levels

Various levels of hygiene facilities and practices must be employed depending on the Class of work being performed. See the OSHA Asbestos Construction Standard or consult with a qualified Asbestos Consultant or Competent Person for recommendations.

4.0 EMERGENCY RESPONSE PROCEDURES

4.1 General Guidance if Emergency Spill or Fiber Release Occurs

In the event any known or suspect ACM material that might contain asbestos is damaged or exposed, the following procedure should be followed:

1. Leave the material alone until qualified personnel are on site. No untrained or unauthorized person should attempt to clean up or seal damaged material beyond the limited guidance to stabilize a situation as described here.
2. Contact the Manning Gardens Asbestos Program Manager (Designated Person).
3. If any ACM material is on anyone in the area, have them wash it off with soap and water immediately. If clothes are contaminated, have them carefully remove them and place them in a plastic bag for disposal or later cleaning.
4. Isolate the area.
 - a. Erect temporary barriers (barrier tape or more substantial physical barriers as circumstance requires) to prevent bystanders from tracking through and further disturbing the material. Reroute foot traffic away from the area.
 - b. Restrict contact.
 - c. Post asbestos warning signs indicating hazards.
5. If feasible, restrict airflow in the area.
 - a. Turn off any fans, blowers, HVAC systems, or anything else that creates airflow in the area, if feasible.
6. If trained Class III O&M personnel from the Manning Gardens Asbestos Emergency Response Team are available, have them suit up and stabilize the area. Otherwise, contact local Asbestos Abatement Contractor and Asbestos Consultant for emergency clean-up and/or abatement.



4.2 Containment of Emergency Friable ACBM Spill or Release

4.2.1. For identification of known or suspect ACBM in any given location within the Manning Gardens building complex, refer to [Section 2.3.1 Table 1](#) in this Manual for quick reference and the detailed, hard survey copies in the APM's files.

4.2.2. Any spill or disturbance of these materials that results in visible debris must be properly cleaned up. However, it is a subjective judgment call on the part of the observer as to whether a particular disturbance is minor in nature (a minor spill) or should be dealt with as a major spill. The size and quantity of damage and spill coupled with location will dictate how to deal with a particular problem. Examples would be as follows:

1. Examples of Minor Friable ACBM Spills

- a. Small amounts of ACBM pipe insulation, ACBM Wallboard Joint Compound, or suspect ACBM debris on a facility floor.
- b. Broken (Pulverized into dust) VAT (Vinyl Asbestos Tile) floor tile.
- c. Small amounts of asbestos cement product on floors or ground.

2. Examples of Major Friable ACBM Spills

- a. Fire and/or water damage to ACBM (water from fire-fighting activities or from a serious roof leak or broken pipe).
- b. Any incident in which a visible cloud of ACBM dust occurs.

4.2.3. While some procedures will be the same for both a minor and a major spill, each category is described step-by-step. The Asbestos Program Manager (Designated Person), as Competent Person on site during any incident, has the authority to modify these procedures in any reasonable way to suit a given emergency situation.

4.3 Minor ACBM Spill or Release Emergency Procedures

4.3.1. Contact the Asbestos Program Manager/Designated Person. The APM will be the on-site person in charge.



4.3.2. Determine if the spill has generated visible dust in the air or on surfaces under or around the damaged ACBM. If, in the judgment of the APM, this poses a potential threat to those working in the area, restrict air movement in the immediate area by turning off HVAC systems, fans, blowers or any other device that might disturb the air until the cleanup by the Emergency Response Team or asbestos contractor is complete.

4.3.3. The immediate area must be evacuated and isolated from foot traffic by students, visitors or curious employees. If the spill is in a room, corridor, mechanical room, etc., that can be easily isolated by closing and locking doors, do so. If not, barrier tape (See Materials and Equipment Listing, [Section 5.0.](#)) and warning signs must be placed around and outside the visible contamination immediately.

4.3.4. The activities described above are primary and crucial to stabilizing the situation in terms of reducing the spread of contamination and must be accomplished quickly and thoroughly.

4.3.5. Once all of the above items have been performed, assess the need for clean-up and repair of damaged ACBM (the source of the spill). This may be performed by a contracted vendor or, if the APM determines it is feasible, by the in-house Emergency Response Team. The APM will determine if repair is an appropriate measure, either long-term or short-term, and if full abatement of the spill source should be scheduled.

4.3.6. If the Emergency Response Team is to perform part or all of the clean-up, set up barrier tape and warning signs around the affected area and use the following guidance:

The primary means of safely cleaning up visible debris of a certain size (dust up to small pieces) is the HEPA vacuum cleaner. If there are larger chunks in the debris, you should use rags or paper towels dampened (not soaked) with amended water to gently pick them up and deposit them gently into a disposal garbage bag for temporary storage and later disposal. Then, use the HEPA vacuum to pick up all other visible debris. ON CARPET: it is recommended that you make a minimum of twenty (20) passes in each of two directions at 90 degrees to each other. ON HARD SURFACES: vacuum up all visible debris and then use rags or paper towels dampened (not soaked) with amended water to thoroughly clean all affected surfaces. The contaminated rags/towels are then placed in a small garbage or zip-loc bag for temporary storage in the 35-gallon drum and later disposal.

4.3.7. Once the Emergency Response Team has completed their work, remove all signs, barrier tape and equipment used for area isolation.

4.3.8. Prepare and complete all recordkeeping activities as required following guidance and using forms provided in the Appendices.



4.4 Major ACBM Spill or Release Emergency Procedures

- 4.4.1. Contact the Asbestos Program Manager/Designated Person.
- 4.4.2. Follow all guidance in [Section 4.3.](#) above for a minor spill.
- 4.4.3. The APM must determine if a wider area of evacuation and isolation is warranted based on quantity of material disturbed, type of material, extent of dust and contamination in area, and whether suspect material has been tracked or otherwise carried into other areas of the plant.
- 4.4.4. The APM will determine if the spill (based on location, quantity and dust generated) warrants temporary shutdown of the building or a part of the building pending proper clean-up and decontamination of the area. The decision to do this shall be based on the risk of contamination to furniture, stored materials and/or personnel adjacent to or inside of the spill area.
- 4.4.5. The APM will immediately contact an approved abatement contractor and asbestos consultant to assist in stabilizing the incident. (As it will take time for the vendors to respond and arrive on site, the APM will continue to perform risk-reducing activities described in this Section).

4.5 Reporting a Spill/Release Incident - Recordkeeping

In all cases where known or suspect ACBM has been unintentionally disturbed, the APM will document the incident and its cleanup. The reporting form is found in the appendices and will be filled out and placed in the record files. It will be retained indefinitely, or until Manning Gardens Management decides it may be destroyed. Note: Some information on this reporting form will be required by OSHA to be maintained for 30 or more years.

5.0 EQUIPMENT AND MATERIALS REQUIRED BY THE O&M PROGRAM

5.1 O&M Equipment and Materials Supply List

The following list identifies equipment and materials that the Manning Gardens APM should have on hand in sufficient quantities and at all times to carry out procedures detailed in this manual; also included are optional items which may be used if required. Other equipment and materials may be selected by the APM in addition to those listed here. Regular checks on quantities must be performed to ensure replacements are ordered before supplies actually run out.

Note: Due to the small amount of non-friable ACBM present in the Manning Gardens, and the decision by the facility/Manning Gardens not to perform any Class III abatement activities in-house, only items listed in bold type will be required in case of an emergency spill.

Description Initial Quantity

- 1. 1 - Vacuum cleaner (HEPA) (Optional+)



2. 6 - Replacement paper bags for HEPA VAC (Optional)
3. 1 - 1 1/2 to 3-gallon sprayer (for larger spills) (Optional)
4. 1 - 1-quart sprayer (for wetting during cleanup of small spills) (Optional)
5. 1 - Wetting agent or surfactant (1 quart) (Optional)
6. 1 - Thermal System Insulation (TSI) patch kit/material (Optional)
7. 1 Roll - Poly sheeting - recommend 10-ft. wide (100-foot roll, 6 mil.) (Optional)
8. 6 - Hooded disposal coveralls (Optional)
9. 3 Rolls - Duct tape (Required)
10. 1 Box - Decontamination wet wipes (Required)
11. 10 - 5 to 10-gallon ordinary plastic garbage bags, 1 to 2 mils (Required)
12. 3 - 33 x 60-inch Asbestos disposal bags (35 gallon) (Optional)
13. 1 Roll - Red Barrier Tape with Asbestos warning language (Required)
14. 4 - Asbestos hazard signs (14" x 20") w/stands (Required)
15. 25 - Asbestos hazard labels (6" x 6") (Required)
16. 1 - 35-gallon fiber storage drums (recommended) (Optional)

6.0 DISCLAIMERS & LIMITATIONS

There is no representation made that any procedure or part of any procedure described herein is free of risk or will provide absolute safety or freedom from the hazards of breathing or ingesting asbestos fibers either during the application of any given procedure or subsequent thereto. The only purpose and intended use of these procedures is to provide management and supervisory guidance that may assist in efforts to reduce risks associated with known asbestos containing building materials (ACBM), assumed ACBM and Presumed ACBM; any other use of these procedures and any use by any party other than the Owner and/or Management is strictly at the user's own risk. Training of personnel regarding the hazards associated with asbestos is essential.



Procedures described are not intended to be, and should not be, conducted by any uninformed or untrained individuals. Every condition cannot be foreseen. Responsible judgment must be applied under varying conditions to reduce risk.

The presence of asbestos in the workplace or public areas, and the choice of particular asbestos abatement procedures, or of special operations and maintenance programs, or of deferring action, may have legal or medical consequences; management oversight and decisions concerning these activities must use judgment and seek specialized assistance and guidance on occasion.

On-going federal, state, and local government review of and changes to regulations may affect the appropriateness and legality of some guidance described herein. Every effort has been made to reflect “state-of-the-art” approaches in this manual as of the publishing date, but periodic review and modification may be required over time.

Appendix A

General Safety Considerations

GENERAL SAFETY CONSIDERATIONS

(This section is reprinted from Appendix D of the EPA's White Book for use by personnel performing O & M activities, and is supplied for informational purposes only)

Ronald L. Stanevich
NIOSH Division of Safety Research

This guide was primarily developed to provide recommendations concerning worker respiratory protection within the asbestos abatement industry. However, employers must not lose sight of the safety hazards their employees are exposed to in performance of their work. Asbestos abatement operations can take place in a variety of industrial, commercial and public settings. Each has unique potential safety hazards that the employer must control. However, nearly all abatement operations have some common safety hazards. With proper job planning and supervision, the employer can control both the health hazards and the safety hazards faced by their workers. The more common safety hazards associated with abatement operations and general recommendations to control them are discussed below. Sources for more specific safety information are listed to supplement and support the applicable OSHA regulatory standards.

I. ELEVATED WORK SURFACES

The nature of asbestos abatement tasks usually requires workers to work from ladders, scaffolds, manlifts, or other elevated surfaces, which creates the potential for fall injuries. Slips and falls from ladders, scaffolds, and other elevated surfaces result in a major portion of the construction industry injuries. Many of these can be prevented by implementing a few control measures:

A. General

- (1) Avoid use of makeshift work platforms by providing portable ladders and scaffolds.
- (2) Ensure that job-built elevated work surfaces are inspected by a competent person other than the individual who erects it.
- (3) Avoid working from elevated surfaces where possible. Consider use of wands for spraying amended water or scrapers with extended handles.

B. Ladders

Eighty percent of ladder-related accidents result from improper use or application.

- (1) Workers should face the ladder when climbing up, down, or working from it.
- (2) Workers should not carry objects in their hands while ascending or descending ladders. While working from a ladder they should hold on with at least one hand.
- (3) Ladders should not be used as a substitute for planks, runways, or walkboards.
- (4) Ladders should be maintained in good condition. Defective ladders should be destroyed so that no one uses them by mistake.
- (5) Ladders should have safety feet in good condition to keep the ladder from slipping and cutting through polyethylene floor covers.
- (6) Ladder rungs/steps should be kept free of contaminants such as amended water and buildup of asbestos waste.
- (7) Employees should work no higher than the fourth step/rung from the top of the ladder.
- (8) Employees should not attempt to "reach" distant objects from a ladder; other platforms should be used.
- (9) Wood or fiberglass ladders should be provided to help control exposure to electrical hazards.
- (10) Employees Should not straddle the space between a ladder and another object.

- (11) Employees should make a visual inspection of ladders before each shift.

Additional information sources:

Ladders -- publication no. ISBN 0-919465-05-6

Construction Safety Association of Ontario, 74 Victoria Street, Toronto. Ontario Canada M5C 2A5

Safety Requirements for Portable Wood Ladders -- ANSI A14.1 - 1982

Safety Requirements for Job-Made Ladders -- ANSI A14.4 - 1979

Safety Requirements for Portable Reinforced Plastic Ladders -- ANSI A14.5 - 1982 American

National Standards Institute, Inc., 1430 Broadway, New York, NY 10018

Portable Ladders -- Industrial Safety Data Sheet #665, National Safety Council, 444 North Michigan Avenue, Chicago Illinois 60611

C. Scaffolds

Falls from scaffolds result in about 2,000 injuries per month in the United States. These can be reduced by

- (1) providing guardrails around the perimeter of the work surface regardless of scaffold height
- (2) securing scaffold decks against slippage
- (3) keeping scaffold uprights vertical and pinned together when stacked
- (4) ensuring vertical members are braced to keep the scaffold plumb and level
- (5) decking the entire top portion of the work surface in lieu of using minimum planking dimensions
- (6) extending planks at least 6" (150 mm) over their support and cleating or restraining them from movement
- (7) ensuring that manufacturer built-in ladders are in good condition
- (8) maintaining mobile scaffold casters in good condition with position locking devices secured when employees are working from the scaffold
- (9) keeping mobile scaffolding height less than four times the minimum base dimension and with adequate cross-bracing
- (10) never interchanging scaffolding pans from different units
- (11) never using defective scaffolding
- (12) designating only "Competent" persons to perform scaffolding repairs.

Additional information sources:

Manually Propelled Mobile Ladder Stands and Scaffolds -- ANSI A92.1 - 1977

Manually Propelled Elevating Work Platforms -- ANSI A92.3 - 1980

Self-propelled Elevating Work Platforms -- ANSI A92.6, American National Standards Institute, Inc., 1430 Broadway, New York, NY 10018

II. ELECTRICAL HAZARDS

Asbestos abatement is often related to renovation or remodeling activities. Normally the equipment, machinery, overhead lighting fixtures, and auxiliary furnishings are removed to facilitate the abatement work. However, it is becoming more common that industrial and commercial buildings remain partially occupied while abatement operations are performed. In either situation, the abatement operator must take positive actions to protect employees from accidentally coming into contact with energized electrical circuits.

A. General

- (1) Perform a pre-work walk-through of the abatement area to look for pre-existing electrical hazards involved with the work.
- (2) De-energize as many circuits as possible.
- (3) Verify that the circuits have been de-energized with a "Field Current Sensing Device" circuit tester. Either lock out/tag out all de-energized circuits to prevent them from accidentally being energized.
- (4) Use non-conductive tools such as scrapers and vacuum attachments made of wood, plastic, or rubber.
- (5) Provide workers with non-conductive rubber boots and/or gloves when work must be done around energized wiring or equipment.
- (6) Prohibit accumulation of puddles of water on the floor. Workers should be trained in the intelligent use of amended water. No water should be used around energized circuits.

B. Permanent Building Circuitry

- (1) Ensure that all permanent circuits are provided with a grounding system. This can be determined with a portable ground tester.
- (2) Ensure that electrical outlets are tightly sealed and taped to avoid water spray.
- (3) Determine what equipment must remain energized during the abatement process.
- (4) Insulate or guard energized equipment and Wiring from employee contact and other conductive objects.
- (5) Avoid damaging permanent building wiring during the work.
- (6) Consider dry removal methods in the vicinity of electrical equipment which must remain energized.

C. Temporary Power

1. All temporary circuits provided by the abatement operator must be provided with a grounding system and protected by ground fault circuit interrupters.
2. Avoid stringing temporary wiring across floors
3. Elevated wiring should not be fastened with staples, nails, or wire.
4. Use care not to damage the wiring insulation during Installation or abatement work.

D. Electrical Cords and Tools

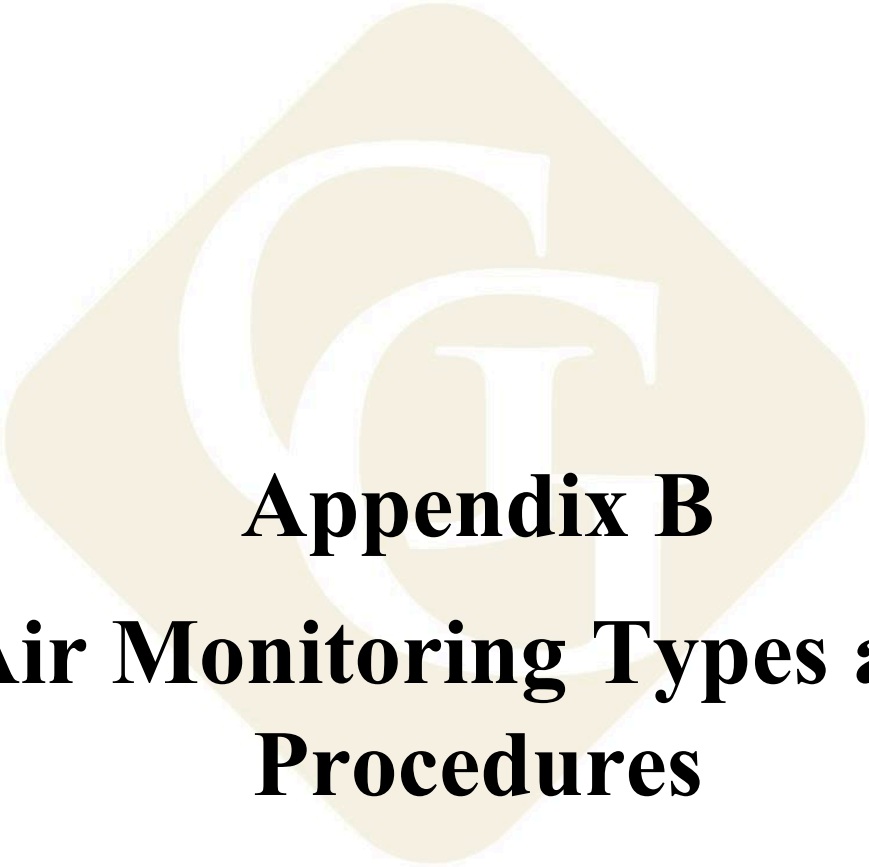
- (1) Provide extension cords which have a ground conductor.
- (2) Ensure that cords are not damaged, contain no splices, and that the grounding lug on the male plug is intact.
- (3) Position extension cords to eliminate stumbling/tripping hazards and to protect them from damage by moving scaffolds.
- (4) Provide electrical tools which are either grounded or of the double-insulated type
- (5) Use shatterproof, guarded bulbs and heavy duty wiring for temporary lighting.
- (6) Where plugs enter receptacles, ensure that the connection is protected by use of duct tape or by other means.

Additional information sources:

National Electrical Safety Code -- ANSI C2-1984

National Electrical Code -- ANSI/NFPA 70-1984, American National Standards Institute, Inc.,1430 Broadway, New York, NY 10018

Temporary Electric Wiring for Construction Sites -- Industrial Safety Data Sheet #515, National Safety Council, 444 North Michigan Avenue, Chicago, Illinois 60611



Appendix B

Air Monitoring Types and Procedures

Air Monitoring Types and Procedures

Air Monitoring Types and Procedures

1. **Personal Air Monitoring:** Shall periodically be conducted on representative employees when they perform certain O&M activities and on vendor Contractors during small and large projects performed under this program. Air monitoring will be conducted in accordance with OSHA's Asbestos Construction Standard CFR 1926.1101, using portable battery-powered pumps designed for the purpose.

Personal Air Monitoring (PAM) shall be performed daily during removal of ACBM by a vendor Asbestos Abatement Contractor: Daily representative personal monitoring is required by OSHA on all jobs performed by an outside vendor Contractor and must be analyzed by an independent third-party laboratory or individual (not an employee of the Contractor). (Daily monitoring will not be required on every in-house O&M activity.)

Negative Exposure Assessment (NEA): Personal air monitoring of airborne asbestos is essential for protecting employee health, since it provides information for determining the correct protection factor required in a respirator to reduce employee exposure inside the respirator below the PEL. **Initial** or **NEA** personal air monitoring will be performed at the start of each different type of asbestos project, which requires one hour or more to complete, and involves the handling or disturbing of asbestos containing material, unless **historical exposure data obtained on essentially similar jobs** has been collected and documented within the last 12 months.

Employee Notification: Where personal air monitoring is performed, the affected employees shall be notified of sampling results as soon as possible following receipt of such results.

2. **Area Air Monitoring:** May be conducted in the regulated work area during abatement activities, and/or in adjacent non-work areas. This may be done to determine if work practices and isolation methods are effective in controlling fiber release in work and non-work areas.

Explanatory Note: In mini-enclosures or during small glovebag projects (10 linear or square feet or less of ACBM), the Personal Air Monitoring usually will suffice without Area Air Monitoring (AAM) being performed. On larger abatement projects or during emergency clean up inside a building or enclosure, AAM is recommended in adjacent non-work areas to prove exposure levels actually realized (hopefully below the PEL).

3. **Clearance Air Monitoring:** The use of Clearance Air Monitoring (CAM) will be determined on a project-by-project basis by the APM/Designated Person or Consultant (Owner's Representative). Projects that will require CAM in all cases shall include but not be limited to the removal of more than the NESHAP reporting limits of 160 square feet, 260 linear feet or 35 cubic feet of RACBM in a removal project. **Note: Required AHERA Clearance Air Monitoring is very specific and must be followed by the Designated Person. See the AHERA regulations or refer to an Asbestos Consultant for guidance.**

Appendix C
Abatement Management

Guidance for Oversight of Asbestos Abatement

1. In-House Emergency or O&M Asbestos Abatement Projects

In all cases where the In-House O&M Team is required to respond to an accidental disturbance of ACBM within the property, the APM/Designated Person will plan and direct such activities as the Competent Person in charge. For small O&M projects (less than 160 square feet, 260 linear feet, or 35 cubic feet), the APM will plan and direct such activities as the Competent Person in charge.

2. Asbestos Abatement Projects by a Vendor Abatement Team

The APM/Designated Person may choose to bring in an outside licensed abatement contractor to complete any required asbestos project. This may range from a simple clean-up and repair of damaged ACBM after a “spill incident,” a small scale or large scale removal to facilitate maintenance, or removal of any size to accommodate renovations or demolitions.

The APM may act as a Construction Manager or may delegate this function to an Asbestos Consultant. Up to three outside vendors may be required on any abatement project.

Licensed Asbestos Consultant/Designer – This individual may act as the Construction Manager and will coordinate all activities required to complete the project. Such coordination will be required between the APM, the Contractor, and the Air Monitor. On larger projects, this individual will perform the Project Design function under OSHA/ASHARA regulations. If pre-project additional sampling of suspect ACBM is required to confirm scope and quantities for abatement, this individual (as a licensed Consultant/Inspector) will perform this task.

Licensed Asbestos Contractor – This company will:

- Plan the project with the Consultant and/or the APM;

- Prepare notifications of the project and send to MO DNR;

- Pay fees due;

- Provide materials and manpower to complete the project to the satisfaction of the APM and the Asbestos Consultant;

- Deliver the ACBM waste to an approved landfill, and;

- Provide proper documentation of all activities required at the end of the project.

On smaller projects, they may take OSHA require personal air samples on workers as long as analysis of samples is performed by a qualified third-party analyst.

Air Monitor – An individual who will take and analyze air samples onsite. The APM and/or Consultant will determine if a third-party air monitor should be onsite during abatement activities. **Personal**, **Area**, and **Clearance** samples may be required.

Components of a Successful Project	PLAYERS/ACTIVITIES
1. Decision to Abate	The APM; the property Owner; budget information from Consultant and Contractor.
2. Specifications/Project Design Developed	Outside Consultant Vendor Accredited Designer, selected contractor may offer opinions or guidance. Accredited Project Designer must be used on large-scale abatement projects.
3. Project Bid or Negotiated	APM; Owner; Consultant if needed.
4. Notifications Prepared and Sent Out; Mobilization Begins	Contractor notifies state and/or federal authorities of planned work, quantities to be abated, and start date; normally a 10-working day minimum wait before project start; mobilization of needed equipment and materials by Contractor for both abatement and retrofit; Consultant (if needed) and Air Monitor (if needed) schedule and plan involvement; APM or Consultant monitors contractor preparation, notifications, etc.
5. Start Project	Contractor; Consultant (as needed); Air Monitor (as needed); APM.
6. Complete Gross Removal	Contractor; Consultant /Air Monitor APM inspect work, Pass/Fail, repeat cleaning as needed.
7. Complete Fine Removal and Cleaning of Entire Work Area	Contractor; Consultant/APM, Air Monitor. Again, visual inspection of work, Pass/Fail, repeat as needed.
8. Air Clearance Testing	If a sealed, regulated area was involved, final air clearance is performed, Pass/Fail by Air Monitor; repeat if needed. If Glove- bag or “open air” cleanup of emergency spill, personal air samples analyzed; detailed visual inspection for completeness of abatement by APM/Consultant.
9. Final Punchlist of Abatement Project	APM and/or Owner, if appropriate.

Appendix D

Documentation of Training

DOCUMENTATION OF TRAINING

Date of Training	
Instructor	
Representing	
Agenda	General Overview of Problems and Definitions. Health Effects. Locations of Potential Asbestos-Containing Material. Recognition of Damage. Use of Work Permit System. Emergency Situations. Contact person for questions.

ATTENDEES

(Print Name)

SIGNATURE

[illegible]

Appendix E
Maintenance Work
Authorization Form

Fiber Release Incident Report

Date: _____

Time: _____

APM or Responding Employee:

The Release Episode was reported by:

Location of Spill:

Name and address of facility involved;

Description of area within facility where incident occurred:

Details of the Incident

Time of incident or disturbance:

Employees, students, others involved in disturbing the ACBM?:

Vendors involved in disturbing the ACBM?:

Known ACBM; Type and %:

Suspect ACBM; Sample delivered to Laboratory (name):

Type and %

Description of how incident occurred:

Appendix F
Job Request Form
(Maintenance Work)

JOB REQUEST FORM FOR MAINTENANCE WORK			
Name		Date	
Telephone No.		Job Request No.	
Requested Start Date		Anticipated Finish Date	
Address		Building No.	Room No(s)
Description of Work:			
Description of any asbestos-containing material that might be affected. If known include location and type			
Name of Requestor	Telephone No	Name of Supervisor	Telephone No
Submit this application to			
Asbestos Program Manager			
Note: An application must be submitted for all maintenance work whether or not ACM might be affected. An authorization must then be received before any work can proceed			
☐ Granted ☐ With Conditions* ☐ Denied			
Job Request No.		*Conditions:	

Appendix G
Cleanup & Decontamination
Form

Cleanup and Decontamination of Area

A. Apartments Employees, if any, participating and actions taken:

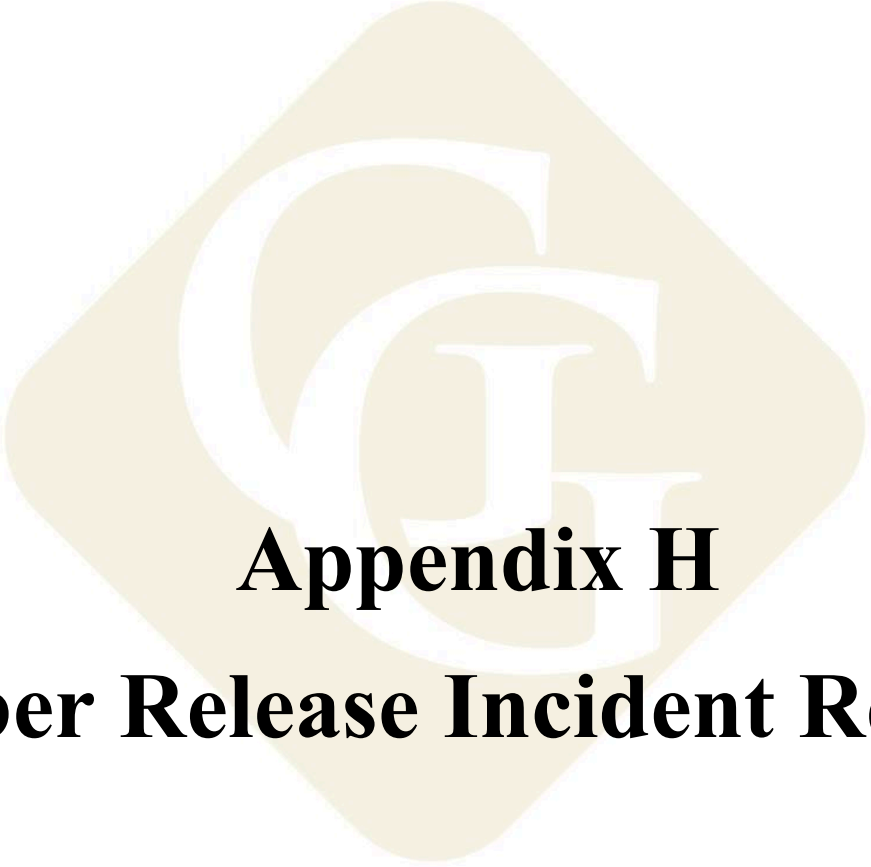
B. Vendors participating, and actions taken:

C. Damaged ACBM repaired?

D. Regulatory agency notification and involvement, if any:

Additional data, descriptions, documentation (including air monitoring), photographs, etc., relating to this incident should be attached to this form.

Signed: _____ (APM/Designated Person) Date: _____



Appendix H

Fiber Release Incident Report

Fiber Release Incident Report

Date: _____

Time: _____

APM or Responding Employee:

The Release Episode was reported by:

Location of Spill:

Name and address of facility involved;

Description of area within facility where incident occurred:

Details of the Incident

Time of incident or disturbance:

Employees, students, others involved in disturbing the ACBM?:

Vendors involved in disturbing the ACBM?:

Known ACBM; Type and %:

Suspect ACBM; Sample delivered to Laboratory (name):

Type and %

Description of how incident occurred:

Appendix I
Evaluation of Work Affecting
ACM

**EVALUATION OF WORK AFFECTING PACM,
SUSPECT AND/OR ASBESTOS-CONTAINING MATERIALS**

This evaluation covers the following maintenance work:

Location of work (address building, room number(s), or general description of work.

General Description:

Address

Building

Room Number(s)

Description of work

Date(s) of work

Work Approval Form Number

Evaluation of work practices employed to minimize disturbance of asbestos

Evaluation of work practices employed to contain released fibers and to clean up the work area

Evaluation of equipment and procedures used to protect workers

PERSONAL AIR MONITORING RESULTS (LICENSED ASBESTOS CONTRACTOR TO SUPPLY

Worker Name

Results

Worker Name

Results

Handling of storage of ACM waste



Appendix J

ACM Reports

ASBESTOS INSPECTION REPORT

Completed in accordance with 40 CFR, 763.86 and 763.85(a)(4)

Assessment Completed for
Gill Group
2100 Gill Plaza Drive, Suite B
Dexter, MD 63841

Jake Epperson
Director of Environmental Services
jake.epperson@gillgroup.com

Assessment Completed on
Manning Gardens
214 Alfred Henry Street
Manning, SC 29102



Assessment Completed by



COMPLIANCE CENTRE

Environmental • Safety • Regulatory

920 Saint Andrews Road • Columbia SC • 29210 • 803-772-1430
(Toll Free) 800-257-8199 • www.compliancecentre.net

Inspection Completed on March 31, 2026
Report Prepared on April 7, 2026

Table of Contents

Section 1.0	Signature Page	- 3 -
Section 2.0	Cover Letter	- 6 -
Section 3.0	Executive Summary.....	- 9 -
Section 3.1	Scope and Purpose.....	- 9 -
Section 3.2	Limitations.....	- 10 -
Section 3.3	Sampling Protocol	- 10 -
Section 3.4	Facility Conditions	- 11 -
Section 3.5	Non-Suspect Materials.....	- 11 -
Section 3.6	Asbestos Containing Material.....	- 11 -
Section 3.7	Recommendations.....	- 11 -
Section 4.0	Asbestos Survey Data.....	- 13 -
Section 4.1	Building Diagram and Field Notes.....	- 15 -
Section 4.2	Photographs.....	- 16 -
Section 5.0	Laboratory Report.....	- 17 -

Section 1.0 Signature Page

This report, entitled "Asbestos Inspection Report", has been prepared at the request of the Jake Epperson of Gill Group. The inspection was conducted by and the report was prepared and reviewed by the undersigned Environmental Professional(s).

Inspection Conducted by:	License #	Signature(s)	Date
Christy Brabham Smith	BI-00472 NC 12659 TN 87507		3/31/2026
Rebecca Shane Halvorson		R. Shane Halvorson	3/31/2026
Report Prepared by:			
Christy Brabham Smith	BI-00472 NC 12659 TN 87507		4/7/2026
Report Reviewed by:			
Christy Brabham Smith	BI-00472 NC 12659 TN 87507		4/7/2026



SCDES ISSUED
Asbestos ID Card



Christy Brabham



**AIR SAMPLER
CONSULTBI
CONSULTPD
SUPERHERA**

**AS-00243
BI-00472
PD-00158
SA-01335**

Expiration Date:
07/09/25
11/03/25
06/05/25
07/09/25

THE STATE OF TENNESSEE

Department of Environment and Conservation
Division of Solid Waste Management

84008-90633

Toxic Substances Program



Date Issued: 1/24/2025

Re-Accreditation

Christy Brabham Smith

DOB
18-Sep-1974

Sex
F

HGT
5'9"

WGT
145

Discipline

Accreditation

Expiration

Inspector

A-I-80078-87507

Dec-31-2025

Asbestos Accreditation

North Carolina Asbestos Accreditation



Jennifer C Brabham Smith
920 St Andrews Rd
Columbia, SC 29210

146260

EXPIRATION			
11-30-2025			
DOB	SEX	HT	WT
09-18-1974	F	5'9"	140
CLASS		#	EXP
INSPECTOR		12659	11-25



SCDES ISSUED

Asbestos ID Card



Rebecca S Halvorson



AIRSAMPLER
CONSULTBI
SUPERAHERA

AS-00469
BI-01409
SA-02478

Expiration Date:
06/12/26
08/10/26
06/12/26

Section 2.0 Cover Letter



COMPLIANCE CENTRE

Environmental • Safety • Regulatory

April 7, 2026

Gill Group
2100 Gill Plaza Drive, Suite B
Dexter, MD 63841

Jake Epperson
Director of Environmental Services
jake.epperson@gillgroup.com

Assessment Completed on
Manning Gardens
214 Alfred Henry Street
Manning, SC 29102

Dear Mr. Epperson:

Compliance Centre has completed a pre-construction asbestos survey of the apartment buildings located at 214 Alfred Henry Street in Manning, SC. There are twenty (20) buildings with fifty (50) units total. There are one bedroom, two bedroom, three bedroom and four bedroom apartments in the complex. All units were inspected during the survey, including the office building (7) that includes an office, a conference room, a meeting facility, a bathroom, custodial office and storage and a laundry room. The apartments were constructed in 1978.

Exterior finishes include asphalt shingle roofs, brick façade, hardiplank façade and concrete slab foundations. Interior finishes include sheetrock ceilings with texture, sheetrock walls with texture, wood baseboard, vinyl covebase, linoleum, vinyl composite tile, luxury vinyl plank, peel and stick vinyl, carpet on padding and glued carpet. All buildings were constructed in 1978 and appear to have been renovated with similar building materials.

The inspection was completed on March 31, 2026 by SCDES licensed Asbestos Inspectors. The inspection process included a review of available records for specification of asbestos containing material (ACM), a visual inspection of the subject facility(s) to identify suspect materials, collection of suspect ACM bulk samples, a physical assessment of the condition and location of suspect ACM and laboratory analysis of bulk samples for asbestos. Samples were analyzed by a NVLAP-accredited ACM laboratory using PLM EPA/600/R-93/116 method. In accordance with SCDES Regulation 61-86.1, negative results for non-friable organically bound materials (NOB) shall be verified with at least one TEM analysis. NOBs include flooring, roofing, mastics, adhesives, caulks and glazing.

The following materials were identified as having more than 1% asbestos:

Suspect Mat. No.	Material Description	Cat. (S,T, M)	Location	Present Cond.	Percent Asbestos	Analysis Method
19A-C	Bottom layer 12x12 VCT	M	13	G / NF	5.1% - tile	PLM EPA/600/R-93/116
21A-C	Bottom layer 12x12 VCT	M	3A, 3C, 3D – in kitchen	G / NF	9.1% - tile	PLM EPA/600/R-93/116

The tile must be removed by a licensed asbestos abatement contractor in accordance with EPA, SCDES and OSHA regulations prior to demolition or renovation activities beginning. The mastic contains less than 1% asbestos. It is not regulated by EPA or SCDES. However, the contractor must comply with OSHA standards for training, respiratory protection and medical surveillance.

The contractor must be licensed by South Carolina Department of Environmental Services as an Asbestos Contractor. A permit application must be submitted to SCDES. The permit must be posted in a conspicuous location on the job site. Application timelines are as follows:

Project Type / Size	Minimum Required Notification Period
Demolition	10 Working Days
NESHAP Removal (> or = 160 sf, 260 lf, 35 cf)	10 Working Days
Small Removal (> sf, but <160 sf, 260 lf, 35 cf)	4 Working Days
Minor Removal (< or = 25 sf)	2 Working Days
Non-Friable NEHSAP Sized Removal (non-friable > or + 160 sf, 260 lf, 35 cf)	4 Working Days

The following materials were identified as having less than 1% asbestos:

Suspect Mat. No.	Material Description	Cat. (S,T, M)	Location	Present Cond.	Percent Asbestos	Analysis Method
16A-C	VCT under hot water heater 12x12 VCT mastic	M	20D	G / NF	<1% - mastic	PLM EPA/600/R-93/116 & TEM
19A-C	Bottom layer 12x12 VCT mastic	M	13	G / NF	0.47% - mastic	PLM EPA/600/R-93/116
21A-C	Bottom layer 12x12 VCT mastic	M	3A, 3C, 3D – in kitchen	G / NF	0.58% - mastic	PLM EPA/600/R-93/116

These materials are not regulated by EPA or SCDES. However, the contractor disturbing these materials is still subject to OSHA standards for employee protection, training and medical surveillance.

Abatement / demolition contractors and bidders are responsible for their own calculations and estimates of quantities. Actual quantities may be more or less than indicated in this report.

The report findings are enclosed, along with an Executive Summary. If after reviewing the report, you have questions, please do not hesitate to contact the undersigned at 803-772-1430.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Brabham Smith', with a stylized flourish at the end.

Christy Brabham Smith, MEERM, CSP, CHMM, CIEC, RIHP

Section 3.0 Executive Summary

Section 3.1 Scope and Purpose

Before a facility or a portion of a facility is renovated or demolished, the owner/operator of the facility or renovation or demolition activity must ensure that the facility or portion of the facility being renovated or demolished has been thoroughly inspected for the presence of asbestos. The inspection must be performed by a person who has been trained and licensed as an Asbestos Building Inspector or management planner in accordance with State training and licensing requirements.

The inspector must identify, quantify, and assess the condition of all suspect asbestos-containing material, either friable or non-friable, on interior and exterior portions of the facility. The inspector must also comply with the procedures specified in Regulation 61-86.1 VI D. In addition, the inspector is required to prepare a written report detailing the findings of the inspection. At a minimum, the report must include information required in Regulation 61-86.1 VI C. A legible copy of the building inspection report must be provided to the Department prior to each demolition, and upon request for renovations. This inspection was completed in an effort to satisfy the National Emission Standard for Hazardous Air Pollutants (NESHAP) and Regulation 61-86.1 that an owner/operator shall ensure that a building inspection, to detect the presence of asbestos-containing material (ACM), has been performed prior to any renovation or demolition activity at a regulated facility.

Under Regulation 61-86.1, Section VI.A.6., an inspection cannot have been performed more than three years prior to a renovation or demolition activity. If more than three years have elapsed since the most recent inspection, the previous inspection shall be confirmed and verified by a licensed building inspector and/or management planner.

Compliance Centre's licensed Asbestos Inspector completed the inspection in accordance with procedures specified in 40 CFR, 763.86 and SCDHEC Regulation 61-86.1, to include a review of available records for specification of asbestos containing material, (such as property records), a visual inspection of the subject facility(s) to identify suspect materials, a physical assessment of the condition and location of suspect material and collection of representative bulk samples for each type of suspect material identified (thermal system insulation, surfacing and miscellaneous). Samples will be analyzed by a NIST-certified laboratory for asbestos type and percentage. This report has been prepared in accordance with 40 CFR, 763.85(a)(4), Asbestos Hazard Emergency Response Act (AHERA), Title II of the Toxic Substance Control Act (TSCA) and SCDHEC Regulation 61-86.1, 40 CFR 61.

This survey was also completed to satisfy and complied with ASTM E2356-18 Standard Practice for Comprehensive Building Asbestos Surveys. The survey included all (accessible) spaces within the "limits of construction," as well as adjacent areas where ACM may be disturbed by construction activities. All units were included in the visual inspection. Bulk samples were collected from nineteen (19) individual units.

Section 3.2 Limitations

While every effort was made to identify suspect asbestos containing materials that may be disturbed during the renovations and/or demolition, Compliance Centre can make no guarantee that the building is asbestos free. Though every effort was made to examine wall cavities and other areas for pipe insulation, spray-applied or trowel applied miscellaneous material or other miscellaneous materials and other Presumed Asbestos Containing Material (PACM), this survey and report only deals with accessible areas of the building. There may be additional inaccessible areas above ceiling, behind walls and below floors that become evident during demolition or renovation activities. If suspect materials are found, additional asbestos testing may be required. During renovations, if building materials are encountered that are not included in the list of non-suspect and/or suspect asbestos containing materials in this report, Compliance Centre requests the opportunity to inspect the materials and update this report.

Section 3.3 Sampling Protocol

Under 40 CFR Part 763.86, suspect ACM are divided into three categories: surfacing materials, thermal system insulation (commonly referred to as TSI), and miscellaneous materials. Regulation 61-86.1, Section VI contains sampling procedures specific to each category of material.

Surfacing material includes, but is not limited to, joint compound, plaster, and painted, troweled on, or spray-applied textured material. To remain in compliance with Regulation 61-86.1, surfacing materials on exterior and interior portions of a facility shall be sampled according to procedures outlined in Regulation 61-86.1, Section VI.D.1. (a)-(c):

- A licensed asbestos inspector shall collect, in a statistically random manner, a minimum of three bulk samples from each homogeneous area of any surfacing that is not assumed to be ACM, and shall collect the samples as follows:
 - At least three bulk samples shall be collected from each homogeneous area that is 1,000 or fewer square feet (sf) or linear feet (Lf) in size.
 - At least five bulk samples shall be collected from each homogeneous area that is greater than 1,000 but fewer than or equal to 5,000 sf or Lf.
 - At least seven bulk samples shall be collected from each homogeneous area that is greater than 5,000 sf or Lf.

Thermal System Insulation (TSI) is any material that is applied to pipes, fittings, boilers, breeching, tanks, ducts, or other facility components for the purpose of preventing heat loss or gain, water condensation, or for other purposes.

Miscellaneous Material is any material that is not considered a surfacing material or thermal system insulation and includes, but is not limited to, flooring, roofing, mastics, gaskets, cementitious materials, caulking, ceiling tiles, fire doors, wall boards, and flexible duct connections. To remain in compliance with Regulation 61-86.1, TSI and miscellaneous materials on exterior and interior portions of a facility shall be sampled in accordance with procedures outlined in Regulation 61-86.1, Section VI.D.2:

- A licensed asbestos inspector shall collect, in a statistically random manner, at least three bulk samples from each homogeneous area of TSI and any miscellaneous material that is not assumed to be ACM.
- In accordance with ASTM E2356, and any subsequent amendments and editions, negative results for non-friable organically bound material (NOB) shall be verified with at least one TEM analysis.

- NOBs include flooring, roofing, mastics, adhesives, caulks, and glazing.
- If an accredited inspector has determined the thermal system insulation to be fiberglass, foam glass, rubber, or other non-suspect material, then bulk samples are not required.

Section 3.4 Facility Conditions

The building materials are in good condition.

Section 3.5 Non-Suspect Materials

The following materials were considered non-suspect and were not collected for bulk sample analysis:

- Vinyl soffet
- Vinyl windows (no caulk)
- Cement board siding (Hardiplank)
- Concrete floor
- Wood doors
- Wood covebase

Section 3.6 Asbestos Containing Material

The following materials were identified as having more than 1% asbestos:

Suspect Mat. No.	Material Description	Cat. (S,T, M)	Location	Present Cond.	Percent Asbestos	Analysis Method
19A-C	Bottom layer 12x12 VCT	M	13	G / NF	5.1% - tile	PLM EPA/600/R-93/116
21A-C	Bottom layer 12x12 VCT	M	3A, 3C, 3D – in kitchen	G / NF	9.1% - tile	PLM EPA/600/R-93/116

The following materials were identified as having less than 1% asbestos:

Suspect Mat. No.	Material Description	Cat. (S,T, M)	Location	Present Cond.	Percent Asbestos	Analysis Method
16A-C	VCT under hot water heater 12x12 VCT mastic	M	20D	G / NF	<1% - mastic	PLM EPA/600/R-93/116 & TEM
19A-C	Bottom layer 12x12 VCT mastic	M	13	G / NF	0.47% - mastic	PLM EPA/600/R-93/116
21A-C	Bottom layer 12x12 VCT mastic	M	3A, 3C, 3D – in kitchen	G / NF	0.58% - mastic	PLM EPA/600/R-93/116

Section 3.7 Recommendations

Materials identified as containing more than 1% asbestos must be removed by a licensed asbestos abatement contractor in accordance with EPA, SCDES and OSHA regulations prior to demolition or renovation activities beginning.

The contractor must be licensed by South Carolina Department of Environmental Services as an Asbestos Contractor. A permit application must be submitted to SCDES. The permit must be posted in a conspicuous location on the job site. Application timelines are as follows:

Project Type / Size	Minimum Required Notification Period
Demolition	10 Working Days
NESHAP Removal (> or = 160 sf, 260 lf, 35 cf)	10 Working Days
Small Removal (> sf, but <160 sf, 260 lf, 35 cf)	4 Working Days
Minor Removal (< or = 25 sf)	2 Working Days
Non-Friable NEHSAP Sized Removal (non-friable > or + 160 sf, 260 lf, 35 cf)	4 Working Days

Materials identified as containing less than 1% asbestos are not regulated by EPA or SCDES. However, the contractor disturbing these materials is still subject to OSHA standards for employee protection, training and medical surveillance.

Abatement / demolition contractors and bidders are responsible for their own calculations and estimates of quantities. Actual quantities may be more or less than indicated in this report.

Section 4.0 Asbestos Survey Data

Suspect Mat. No.	Material Description	Cat. (S,T, M)	# Samples	Location	Present Cond.	Percent Asbestos	Analysis Method
1A-M	Sheetrock/texture ceiling	M/S	13	Throughout all units / buildings - ceilings	G / F	ND	PLM EPA/600/R-93/116
2A-M	Sheetrock/texture walls	M/S	13	Throughout all units / buildings - walls	G / F	ND	PLM EPA/600/R-93/116
3A-C	Brown covebase	M/M	3	14, 20D, 1A, 2D, 2F	G / NF	ND	PLM EPA/600/R-93/116 & TEM
4A-C	Linoleum	M/M	3	16	G / NF	ND	PLM EPA/600/R-93/116 & TEM
5A-C	LVP (grey)	M/M	3	18, 20C, 17, 9, 12, 1B, 1C, 2B, 2D, 2E, 2F, 2H, 4A, 4B, 4C, 4D, 4E, 4F, 4G	G / NF	ND	PLM EPA/600/R-93/116 & TEM
6A-C	Black covebase	M/M	3	18, 20G, 20F, 9, 7 (maintenance office), 12, 1B, 1C, 1D, 2A, 2B, 2C, 2E, 4A, 4B, 4D, 4E, 4F, 4G	G / NF	ND	PLM EPA/600/R-93/116 & TEM
7A-D	12x12 VCT	M/M	3	20A, 20B, 20D, 20E, 20H, 6, 8, 10, 2A, 2C, 2E, 5A, 4C, 4F,	G / NF	ND	PLM EPA/600/R-93/116 & TEM
8A-C	White covebase	M/M	3	20A, 20B, 20E, 20H, 21, 13, 6, 10, 1B, 2H, 4H	G / NF	ND	PLM EPA/600/R-93/116 & TEM
9A-C	12x12 VCT	M/M	3	19, 7 (maintenance office), 6	G / NF	ND	PLM EPA/600/R-93/116 & TEM
10A-C	Grey covebase	M/M	3	11	G / NF	ND	PLM EPA/600/R-93/116 & TEM
11A-C	Blue 12x12 VCT	M/M	3	7 (office and bathroom, laundry)	G / NF	ND	PLM EPA/600/R-93/116 & TEM
12A-C	Orange 12x12 VCT	M/M	3	7 (office and bathroom, laundry)	G / NF	ND	PLM EPA/600/R-93/116 & TEM

13A-C	Carpet glue	M	3	7 (office, conference, meeting room)	G / NF	ND	PLM EPA/600/R-93/116 & TEM
14A-C	Bottom layer VCT	M/M	3	7 (office and bathroom)	G / NF	ND	PLM EPA/600/R-93/116 & TEM
15A-C	Dark tan peel and stick vinyl	M/M	3	7 (maintenance storage room)	G / NF	ND	PLM EPA/600/R-93/116 & TEM
16A-C	VCT under hot water heater 12x12 VCT	M/M	3	20D	G / NF	<1% - mastic	PLM EPA/600/R-93/116 & TEM
17A-C	12x12 VCT	M/M	3	20G, 4H, 13, 1B, 2G, 2H, 4H, stairwell landings in Bldg 2 and 4	G / NF	ND	PLM EPA/600/R-93/116 & TEM
18A-C	HVAC duct wrap (over fiberglass)	M	3	20F	G / F	ND	PLM EPA/600/R-93/116 & TEM
19A-C	Bottom layer 12x12 VCT	M/M	3	13	G / NF	5.1% - tile 0.47% - mastic	PLM EPA/600/R-93/116
20A-C	Carpet glue	M	3	3A, 3C, 3D	G / NF	ND	PLM EPA/600/R-93/116 & TEM
21A-C	Bottom layer 12x12 VCT	M/M	3	3A, 3C, 3D – in kitchen	G / NF	9.1% - tile 0.58% - mastic	PLM EPA/600/R-93/116
22A-C	Brick mortar	M	3	Brick mortar – exterior all units	G / NF	ND	PLM EPA/600/R-93/116
23A-C	Shingles and felt	M/M	3	Roofing – all units	G / NF	ND	PLM EPA/600/R-93/116 & TEM

Sampling #'s

Misc = 3 samples (if negative, 1 TEM for NOBs)

S = <1,000 ft² = 3; 1000-5000 ft² = 5; >5,000 ft² = 7

TSI = <6 ft² = 1; > 6ft² = 3

Present Condition

F = Friable

NF = Nonfriable

G = Good (Very localized limited damage)

D = Damaged (Damage of less than 10% distributed and less than 25% localized)

SD = Significantly Damaged (Damage equal to or greater than 10% distributed / 25% localized)

Analysis Method

PLM = polarized light microscopy

TEM = transmission electron microscopy

Section 4.1 Building Diagram and Field Notes



Manning Garden Apartments



Imagery ©2026 Airbus, Maxar Technologies, Map data ©2026 50 ft

Unit	Ceilings	Walls	Floors	Other
~~13~~ 14	SHEETROCK TEXTURE (1)	SHEETROCK TEXTURE (2)	LVP (NS) (5) brown cove (3) Carpet (no gl) (3A)	1A 3 bed 2A 1 bath 3A
16	(1)	(2)	LINOLEUM (4) Carpet	4A-C 4 B ^{ED} 1B 2B 2 BATH
18	(1)	(2)	LVP (5) CARPET BLACK COVE (6)	5A-C 4 B ^{ED} 1C 2 BATH 2C 2 BATH 6A-C
20A	(1)	(2)	CARPET 12X12 (7) LVP WHITE COVE (8)	1 B ^{ED} 1 BATH 7A-C 8A-C
20B	(1)	(2)	(8) (7) CARPET	1D 1 B 2D 1 BATH
20C	(1)	(2)	(5) (3) (5) in bath	1E 1 B 2E 1 BATH
20D	(1)	(2)	(7) (3) BOTTOM LAYER TILE UNDER H ₂ O HEATER (16)	7D 1 B 16A-C 1 BA
20G	(1)	(2)	LVP BLACK COVE (6) CARPET (7) DARK TAN 12X12	17A-C 1 B 1 BA
20F	(1)	(2)	BLACK COVE (6)	18A-C 1 B HVAC DUCT (18) 1 BA
20E	(1)	(2)	(7) (8) in bath kitchen carpet	1 ^{LO} bed 1 bath
20H	(1)	(2)	LVP (brown) Carpet (8) (7)	1 bed 1 bath
21	(1)	(2)	CARPET 12X12 (8) WHITE COVE	4 B 2 BA 1 F 2 F

Unit	Ceilings	Walls	Floors	Other
19	(1)	(2)	BATH 12x12 (9) CARPET (9) 12x12 KITCHEN	9A-C HB 2 BA 19 26
17	(1)	(2)	BATH LVP CARPET (9) LVP BATH & KITCHEN	HB 2 BA
15	(1)	(2)	(9) LVP	
13	(1)	(2)	(12) BOTTOM LAYER 12x12 (19) WHITE COVE (8)	19A-C 3 B 1.5 BA
11	(1)	(2)	CARPET GRAY COVE (10)	10A-C 3 B 1.5 BA
9	(1)	(2)	LVP (5) BLACK COVE (6)	3 B 1.5 BA
OFFICE/ COMMUNITY	(1)	(2)	BLUE 12x12 (1) ORANGE 12x12 (2) CARPET/MASTIC (3) BOTTOM LAYER (14)	13A-C 12A-C 11A-C 14A-C
7 LAUNDRY	(1)	(2)	(11) (12)	14 24
7 MAINT STORAGE	(1)	(2)	DARK TAN PEEL 'STICK (15) CARPET	15A-C
7 MAINT OFFICE	(1)	(2)	(9) CONCRETE (6) BLACK COVE	
6	(1)	(2)	(9) (7) WHITE COVE (8) CARPET	3 B 1.5 BA
8	(1)	(2)	(7) CARPET	3 B 1.5 BA

BUILDING
72
22B
BRICK
MORTAR

Unit	Ceilings	Walls	Floors	Other
10	(1)	(2)	(7) WHITE COVE (8) CARPET	3 B 1.5 BA
12	(1)	(2)	CARPET (3) LVP (3) BLACK COVE (6)	1 F 2 I 4 B 2 BA
1A	(1)	(2)	LVP BROWN COVE (7) CERAMIC (BATH)	2 B 1 BA
1B	(1)	(2)	CARPET (17) LVP (3) WHITE COVE (8) BLACK COVE (6)	2 B 1 BA
1C	(1)	(2)	LVP (5) BLACK COVE (6)	2 B 1 BA
1D	(1)	(2)	LVP (5) BLACK COVE (6)	2 B 1 BA
2A	(1)	(2)	(7) BLACK COVE (6) CARPET	2 B 1 BA
2B	(1)	(2)	LVP (5) BLACK COVE (6)	1 J 2 J 2 B 1 BA
2C	(1)	(2)	CARPET (2) BLACK COVE (6)	2 B 1 BA
2D	(1)	(2)	LVP (3) BROWN COVE (3)	2 B 1 BA
2E	(1)	(2)	CARPET (7) GRAY LVP (5) BLACK COVE (6)	2 B 1 BA
2F	(1)	(2)	CARPET LVP (5) BROWN COVE (3)	2 B 1 BA

STAIRWELL
17

RUBBER
FLOOR
TREADS

Unit	Ceilings	Walls	Floors	Other
2G	(1)	(2)	(17)	1 K 2 K 1 B 1 BA
2H	(1)	(2)	(17) LVP (5) WHITE COVE (8)	1 B CARPET GLUE
3A B C D	(1)	(2)	NS WOOD ROVE GLUED CARPET (7) 3A, C, D LVP (B)	2A-C (3C) - KITCHEN 2A-C → BOTTOM LAYER FOUND IN A, C, D FLOOR TIE
5A B #3 BUILDING MATERIALS C #3 BUILDING MATERIALS D #3 BUILD MATERIALS	(1)	(2)	(7) CARPET	
4A	(1)	(2)	LVP (5) BLACK COVE (6)	2B 1 BA
4B	(1)	(2)	LVP (5) BLACK COVE (6)	2B 1 BA
4C	(1)	(2)	CARPET (7) LVP (BATH) (5)	2B 1 BA
4D	(1)	(2)	LVP (5) BLACK COVE (6)	
4E	(1)	(2)	CARPET (7) BLACK COVE (6) LVP (5)	2B 1 BA
4F	(1)	(2)	CARPET (7) LVP KITCHEN (5) NS WOOD BLACK COVE (6)	2B 1 BA
4G	(1)	(2)	CARPET (7) LVP (5) BLACK COVE (6)	2B 1 BA
4H	(1)	(2)	CARPET (17) WHITE COVE (8)	2B 1 BA

NS WOOD FLOOR
STAIRWELL
1 L
2 L

(17)
STAIRWELL
1 m
2 m

(22A)
BLACK MORTAR

NS HARDPLANK, VINYL WINDOWS, SOFFIT, - non suspect

(22A-C) SHINGLES / FELT

Section 4.2 Photographs



SM9



SM16 - tile under hot water heater



Roofing shingles and felt (SM22 and SM23)





Foil over fiberglass on HVAC duct



SM18 in unit 20F



Ceramic tile in bathroom in unit 1A



Exterior - brick mortar (SM22) and shingles (SM23)



Sheetrock ceiling (SM1) and sheetrock wall (SM2)



Vinyl windows - no caulking



Sheetrock ceilings and walls (SM1 and SM2)



Brown vinyl plank flooring



Black covebase (SM6)



Grey LVP (SM5)



Carpet on pad (no glue)



SM5



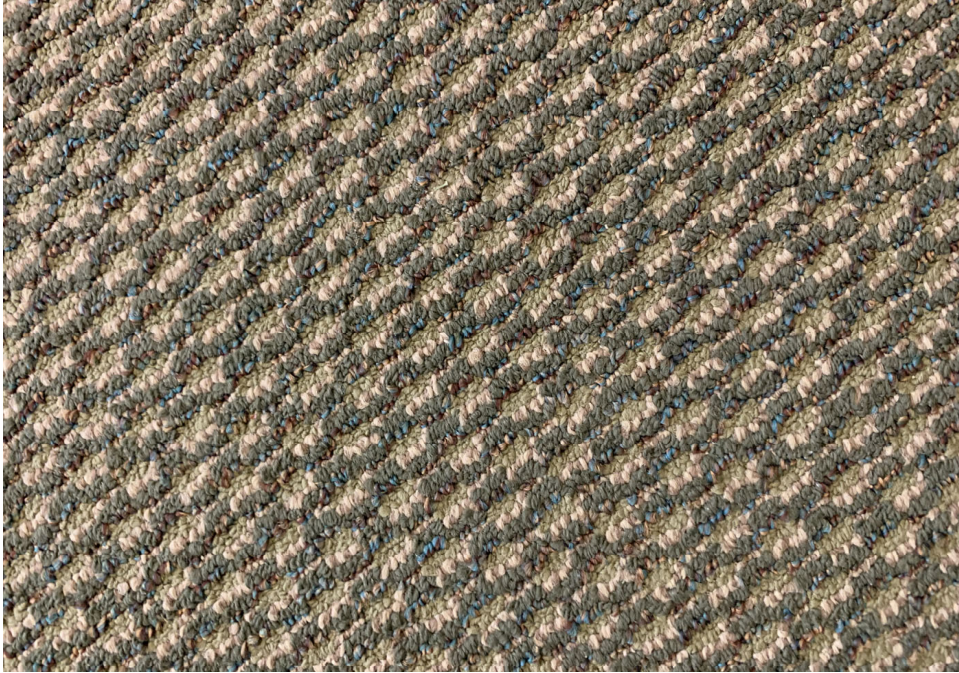
SM7 - 12x12 VCT



Sheetrock wall (SM2) and brown covebase (SM3)



Grey LVP (SM5)



Bottom layer VCT (SM19)



Blue VCT (SM11) and orange VCT (SM12)



Carpet glue (SM13)



SM7



Carpet and pad (no glue)





Bottom layer tile (3A, 3C, 3D)



SM18 - HVAC duct wrap in unit 20F



Rubberized flooring in stairwell (non suspect)



Brick mortar (SM22)



Shingles (SM23)

Section 5.0 Laboratory Report



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Attention: Christy Smith
Compliance Centre, Inc.
920 Saint Andrews Rd
Columbia, SC 29210

Phone: (803) 315-5316

Fax: (803) 772-1435

Received Date: 04/01/2026 10:10 AM

Analysis Date: 04/01/2026

Collected Date: 03/31/2026

Project: Manning Garden Apts

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1A-Texture 412602171-0001 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 5% Mica 35% Non-fibrous (Other)	None Detected
1B-Texture 412602171-0002	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		50% Ca Carbonate 50% Non-fibrous (Other)	None Detected
1B-Sheetrock 412602171-0002A	Sheetrock/texture ceiling	Brown/Gray/Beige Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
1C-Texture 412602171-0003 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 5% Mica 25% Non-fibrous (Other)	None Detected
1D-Texture 412602171-0004	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 3% Mica 37% Non-fibrous (Other)	None Detected
1D-Sheetrock 412602171-0004A	Sheetrock/texture ceiling	Brown/Gray Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
1E-Texture 412602171-0005 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 3% Mica 37% Non-fibrous (Other)	None Detected
1F-Texture 412602171-0006 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		50% Ca Carbonate 50% Non-fibrous (Other)	None Detected
1G-Texture 412602171-0007 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1H-Texture 412602171-0008	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1H-Tape 412602171-0008A	Sheetrock/texture ceiling	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
1H-Joint Compound 412602171-0008B	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1H-Sheetrock 412602171-0008C	Sheetrock/texture ceiling	Brown/White Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
1I-Texture 412602171-0009	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1I-Sheetrock 412602171-0009A	Sheetrock/texture ceiling	Brown/White Fibrous Homogeneous	3% Cellulose	97% Non-fibrous (Other)	None Detected
1J-Texture 412602171-0010 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1J-Tape 412602171-0010A	Sheetrock/texture ceiling	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
1J-Joint Compound 412602171-0010B	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1K-Texture 412602171-0011 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
1L-Texture 412602171-0012 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
1L-Tape 412602171-0012A	Sheetrock/texture ceiling	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
1L-Joint Compound 412602171-0012B	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (Other)	None Detected
1M-Texture 412602171-0013 <i>No sheetrock present.</i>	Sheetrock/texture ceiling	White Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2A-Texture 412602171-0014 <i>No sheetrock present.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2B-Tape 412602171-0015	Sheetrock/texture walls	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
2B-Texture 412602171-0015A <i>Limited sample submitted, results could not be verified.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
2B-Sheetrock 412602171-0015B	Sheetrock/texture walls	Beige Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
2C-Texture 412602171-0016 <i>No sheetrock present.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
2D-Texture 412602171-0017 <i>No sheetrock present.</i>	Sheetrock/texture walls	Gray/White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
2E-Texture 412602171-0018 <i>No sheetrock present.</i>	Sheetrock/texture walls	White Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
2E-Joint Compound 412602171-0018A	Sheetrock/texture walls	Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
2F-Texture 412602171-0019	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2F-Sheetrock 412602171-0019A	Sheetrock/texture walls	Brown/Gray Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
2G-Texture 412602171-0020 <i>No sheetrock present.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		50% Ca Carbonate 50% Non-fibrous (Other)	None Detected
2H-Texture 412602171-0021 <i>Limited sample submitted, results could not be verified.</i>	Sheetrock/texture walls	White Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
2H-Sheetrock 412602171-0021A	Sheetrock/texture walls	Brown/White Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
2I-Texture 412602171-0022	Sheetrock/texture walls	Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2I-Sheetrock 412602171-0022A	Sheetrock/texture walls	Brown/Gray/White Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
2J-Texture 412602171-0023 <i>No sheetrock present.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
2K-Texture 412602171-0024 <i>No sheetrock present.</i>	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2K-Tape 412602171-0024A	Sheetrock/texture walls	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
2L-Texture 412602171-0025	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2L-Tape 412602171-0025A	Sheetrock/texture walls	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
2L-Joint Compound 412602171-0025B	Sheetrock/texture walls	White Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
2L-Sheetrock 412602171-0025C	Sheetrock/texture walls	Brown/White Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
2M-Texture 412602171-0026	Sheetrock/texture walls	White/Beige Non-Fibrous Homogeneous		70% Ca Carbonate 30% Non-fibrous (Other)	None Detected
2M-Tape 412602171-0026A	Sheetrock/texture walls	Beige Fibrous Homogeneous	99% Cellulose	1% Non-fibrous (Other)	None Detected
2M-Joint Compound 412602171-0026B	Sheetrock/texture walls	White Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
2M-Sheetrock 412602171-0026C	Sheetrock/texture walls	Brown/Gray Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
3A-Cove Base 412602171-0027	Brown covebase	Brown Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
3A-Mastic 412602171-0027A	Brown covebase	White/Beige Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
3B-Cove Base 412602171-0028	Brown covebase	Brown/Gray Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
3B-Mastic 412602171-0028A	Brown covebase	Beige Non-Fibrous Homogeneous		5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
4A-Linoleum 412602171-0029	Linoleum	Brown/Beige Non-Fibrous Homogeneous	5% Cellulose 10% Glass	20% Ca Carbonate 65% Non-fibrous (Other)	None Detected
4A-Mastic 412602171-0029A	Linoleum	Tan Non-Fibrous Homogeneous		2% Quartz 5% Ca Carbonate 93% Non-fibrous (Other)	None Detected
4B-Linoleum 412602171-0030	Linoleum	Brown/White Non-Fibrous Homogeneous	<1% Synthetic 5% Glass	20% Ca Carbonate 75% Non-fibrous (Other)	None Detected
4B-Mastic 412602171-0030A	Linoleum	Tan/Yellow Non-Fibrous Homogeneous		10% Quartz 90% Non-fibrous (Other)	None Detected
5A 412602171-0031	LVP - grey	Brown/Beige Non-Fibrous Homogeneous	5% Cellulose 10% Glass	2% Quartz 15% Ca Carbonate 68% Non-fibrous (Other)	None Detected
5B-Luxury Vinyl Plank 412602171-0032	LVP - grey	Gray/White Non-Fibrous Homogeneous	2% Glass	40% Ca Carbonate 58% Non-fibrous (Other)	None Detected
5B-Mastic 412602171-0032A	LVP - grey	Yellow Non-Fibrous Homogeneous		15% Quartz 85% Non-fibrous (Other)	None Detected
6A-Cove Base 412602171-0033	Black covebase	Black Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
6A-Mastic 412602171-0033A	Black covebase	Yellow/Clear Non-Fibrous Homogeneous		3% Ca Carbonate 97% Non-fibrous (Other)	None Detected
6B-Cove Base 412602171-0034	Black covebase	Black Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
6B-Mastic 412602171-0034A	Black covebase	Yellow/Clear Non-Fibrous Homogeneous		10% Quartz 5% Ca Carbonate 85% Non-fibrous (Other)	None Detected
7A-Vinyl Composition Tile 412602171-0035	12x12 VCT	Tan Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (Other)	None Detected
7A-Mastic 412602171-0035A	12x12 VCT	Tan Non-Fibrous Homogeneous	3% Cellulose	5% Ca Carbonate 92% Non-fibrous (Other)	None Detected

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
7B-Vinyl Composition Tile	12x12 VCT	Tan Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (Other)	None Detected
412602171-0036					
7B-Mastic	12x12 VCT	Tan Non-Fibrous Homogeneous		3% Ca Carbonate 97% Non-fibrous (Other)	None Detected
412602171-0036A					
7C-Vinyl Composition Tile	12x12 VCT	Brown/Tan Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (Other)	None Detected
412602171-0036B					
7C-Mastic	12x12 VCT	Tan Non-Fibrous Homogeneous	2% Cellulose	10% Ca Carbonate 88% Non-fibrous (Other)	None Detected
412602171-0036C					
8A-Cove Base	White covebase	White/Beige Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
412602171-0037					
8A-Mastic	White covebase	Brown/Beige Non-Fibrous Heterogeneous		2% Quartz 98% Non-fibrous (Other)	None Detected
412602171-0037A					
8B-Cove Base	White covebase	White Non-Fibrous Homogeneous		20% Ca Carbonate 80% Non-fibrous (Other)	None Detected
412602171-0038					
8B-Mastic	White covebase	Brown/Beige Non-Fibrous Heterogeneous	<1% Fibrous (Other)	10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
412602171-0038A					
9A-Vinyl Composition Tile	12x12 VCT	White Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
412602171-0039					
9A-Mastic	12x12 VCT	Tan Non-Fibrous Homogeneous	<1% Cellulose	5% Quartz 95% Non-fibrous (Other)	None Detected
412602171-0039A					
9B-Vinyl Composition Tile	12x12 VCT	White Non-Fibrous Homogeneous	<1% Cellulose	30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
412602171-0040					
9B-Mastic	12x12 VCT	Tan/Yellow Non-Fibrous Homogeneous		10% Quartz 90% Non-fibrous (Other)	None Detected
412602171-0040A					
10A-Cove Base	Grey covebase	Gray Non-Fibrous Homogeneous		25% Ca Carbonate 75% Non-fibrous (Other)	None Detected
412602171-0041					
10A-Mastic	Grey covebase	Beige Non-Fibrous Homogeneous		<1% Quartz 100% Non-fibrous (Other)	None Detected
412602171-0041A					
10B-Cove Base	Grey covebase	Brown/Gray Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
412602171-0042					
10B-Mastic	Grey covebase	Beige Non-Fibrous Homogeneous		5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
412602171-0042A					
11A-Vinyl Composition Tile	Blue 12x12 VCT	Blue Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
412602171-0043					

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
11A-Mastic	Blue 12x12 VCT	Brown/Gray/Tan Non-Fibrous Homogeneous	2% Cellulose	5% Quartz 93% Non-fibrous (Other)	None Detected
412602171-0043A Result includes a small amount of inseparable attached leveler.					
11B-Vinyl Composition Tile	Blue 12x12 VCT	Blue Non-Fibrous Homogeneous		50% Ca Carbonate 50% Non-fibrous (Other)	None Detected
412602171-0044					
11B-Mastic	Blue 12x12 VCT	Tan/Yellow Non-Fibrous Homogeneous	<1% Cellulose	5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
412602171-0044A					
12A-Vinyl Composition Tile	Orange 12x12 VCT	Orange Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
412602171-0045					
12A-Mastic	Orange 12x12 VCT	Yellow Non-Fibrous Homogeneous		<1% Quartz 2% Ca Carbonate 98% Non-fibrous (Other)	None Detected
412602171-0045A					
12B-Vinyl Composition Tile	Orange 12x12 VCT	Brown/Tan/Orange Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
412602171-0046					
12B-Mastic	Orange 12x12 VCT	Tan/Yellow Non-Fibrous Homogeneous	<1% Cellulose	5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
412602171-0046A					
13A	Carpet glue	Yellow Non-Fibrous Homogeneous		2% Quartz 2% Ca Carbonate 96% Non-fibrous (Other)	None Detected
412602171-0047					
13B	Carpet glue	Tan/Yellow Non-Fibrous Homogeneous	<1% Synthetic	<1% Quartz 15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
412602171-0048					
14A-Vinyl Composition Tile	Bottom layer VCT	Gray Non-Fibrous Homogeneous	<1% Cellulose <1% Glass	15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
412602171-0049					
14A-Mastic	Bottom layer VCT	Yellow Non-Fibrous Homogeneous	<1% Cellulose	<1% Ca Carbonate 100% Non-fibrous (Other)	None Detected
412602171-0049A					
14B-Vinyl Composition Tile	Bottom layer VCT	Gray/White/Beige Fibrous Homogeneous	5% Cellulose <1% Glass	10% Ca Carbonate 85% Non-fibrous (Other)	None Detected
412602171-0050					
14B-Mastic	Bottom layer VCT	Tan/Yellow Non-Fibrous Homogeneous		5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
412602171-0050A					
15A-Vinyl Composition Tile	Dark tan Peel/Stick VCT	Tan/Black Non-Fibrous Homogeneous		30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
412602171-0051					
15A-Mastic	Dark tan Peel/Stick VCT	White Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
412602171-0051A					
15B-Vinyl Composition Tile	Dark tan Peel/Stick VCT	Black/Beige Non-Fibrous Homogeneous	<1% Cellulose	30% Ca Carbonate 70% Non-fibrous (Other)	None Detected
412602171-0052					
15B-Mastic	Dark tan Peel/Stick VCT	White Non-Fibrous Homogeneous	<1% Cellulose	10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
412602171-0052A					

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
16A-Vinyl Composition Tile	VCT under hot water heater	Brown Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
412602171-0053					
16A-Mastic	VCT under hot water heater	Tan/Black Non-Fibrous Heterogeneous		15% Ca Carbonate 85% Non-fibrous (Other)	<1% Chrysotile
412602171-0053A					
16B-Vinyl Composition Tile	VCT under hot water heater	Brown Non-Fibrous Homogeneous		40% Ca Carbonate 60% Non-fibrous (Other)	None Detected
412602171-0054					
16B-Mastic	VCT under hot water heater	Brown/Tan/Black Non-Fibrous Homogeneous	5% Cellulose <1% Hair	10% Ca Carbonate 85% Non-fibrous (Other)	<1% Chrysotile
412602171-0054A					
17A	12x12 VCT	Gray/Beige Non-Fibrous Homogeneous		60% Ca Carbonate 40% Non-fibrous (Other)	None Detected
412602171-0055					
17B	12x12 VCT	Brown/Tan Non-Fibrous Homogeneous		50% Ca Carbonate 50% Non-fibrous (Other)	None Detected
412602171-0056					
18A-Wrap	HVAC wrap	Brown/Tan/Silver Fibrous Heterogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
412602171-0057					
Result includes inseparable attached mastic.					
18A-Insulation	HVAC wrap	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected
412602171-0057A					
18B-Wrap	HVAC wrap	Brown/Tan/Silver Fibrous Heterogeneous	40% Cellulose <1% Glass	60% Non-fibrous (Other)	None Detected
412602171-0058					
Result includes a small amount of inseparable attached mastic.					
18B-Insulation	HVAC wrap	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected
412602171-0058A					
18C-Wrap	HVAC wrap	Brown/Tan/Silver Fibrous Homogeneous	60% Cellulose	40% Non-fibrous (Other)	None Detected
412602171-0059					
18C-Insulation	HVAC wrap	Yellow Fibrous Homogeneous	99% Glass	1% Non-fibrous (Other)	None Detected
412602171-0059A					
19A-Vinyl Composition Tile	Bottom layer 12x12 VCT	Beige Non-Fibrous Homogeneous		15% Ca Carbonate 83% Non-fibrous (Other)	2% Chrysotile
412602171-0060					
19A-Mastic	Bottom layer 12x12 VCT	Black Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
412602171-0060A					
19B-Vinyl Composition Tile	Bottom layer 12x12 VCT				Positive Stop (Not Analyzed)
412602171-0061					
19B-Mastic	Bottom layer 12x12 VCT				Positive Stop (Not Analyzed)
412602171-0061A					
20A	Carpet glue	Yellow/Clear Non-Fibrous Heterogeneous	2% Cellulose	10% Quartz 88% Non-fibrous (Other)	None Detected
412602171-0062					

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
20B	Carpet glue	Yellow/Clear Non-Fibrous Homogeneous		10% Quartz 90% Non-fibrous (Other)	None Detected
412602171-0063					
21A	Bottom layer 12x12 VCT	Gray/Yellow/Beige Non-Fibrous Heterogeneous		<1% Quartz 15% Ca Carbonate 83% Non-fibrous (Other)	2% Chrysotile
412602171-0064					
Result includes a small amount of inseparable attached mastic/leveler.					
21B-Vinyl Composition Tile	Bottom layer 12x12 VCT				Positive Stop (Not Analyzed)
412602171-0065					
21B-Mastic	Bottom layer 12x12 VCT	Black Non-Fibrous Homogeneous	<1% Cellulose	10% Ca Carbonate 88% Non-fibrous (Other)	2% Chrysotile
412602171-0065A					
22A	Brick mortar	Gray Non-Fibrous Homogeneous		40% Quartz 60% Non-fibrous (Other)	None Detected
412602171-0067					
22B	Brick mortar	Gray Non-Fibrous Homogeneous		60% Quartz 40% Non-fibrous (Other)	None Detected
412602171-0068					
22C	Brick mortar	Gray Non-Fibrous Homogeneous		60% Quartz 40% Non-fibrous (Other)	None Detected
412602171-0068A					
23A-Shingle	Shingles / felt	Brown/Gray/Black Fibrous Homogeneous	15% Glass	2% Quartz 30% Ca Carbonate 53% Non-fibrous (Other)	None Detected
412602171-0069					
23A-Felt	Shingles / felt	Black Fibrous Homogeneous	95% Cellulose	5% Non-fibrous (Other)	None Detected
412602171-0069A					
23B-Shingle	Shingles / felt	Gray/Black Non-Fibrous Homogeneous	5% Glass	2% Quartz 15% Ca Carbonate 78% Non-fibrous (Other)	None Detected
412602171-0070					
23B-Felt	Shingles / felt	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
412602171-0070A					

Analyst(s)

Ashley Hill (49)

Ingrid Patrick (31)

Kelsie Dwyer (45)

Lee Plumley, Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Pineville, NC NVLAP Lab Code 200841-0, VA 3333 00312

Initial report from: 04/01/2026 15:51:10



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Attention: Christy Smith
Compliance Centre, Inc.
920 Saint Andrews Rd
Columbia, SC 29210

Phone: (803) 315-5316
Fax: (803) 772-1435
Received Date: 04/01/2026 10:10 AM
Analysis Date: 04/02/2026 - 04/06/2026
Collected Date: 03/31/2026

Project: Manning Garden Apts

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
3C-Cove Base 412602171-0071	Brown Cove Base	Gray Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
3C-Mastic 412602171-0072	Brown Cove Base	Beige Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
4C-Linoleum 412602171-0073	Linoleum	Brown Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
4C-Mastic 412602171-0074	Linoleum				
Insufficient Material					
5C-Luxury Vinyl Plank 412602171-0075	LVP-Grey	Brown Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
5C-Mastic 412602171-0076	LVP-Grey	Yellow Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
6C-Cove Base 412602171-0077	Black Cove Base	Black Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
6C-Mastic 412602171-0078	Black Cove Base	Clear Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
7D-Vinyl Composition Tile 412602171-0079	12x12 VCT	White Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
7D-Mastic 412602171-0080	12x12 VCT	Tan Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
Sample below method recommended minimum weight; analyzed at client's request.					
8C-Cove Base 412602171-0081	White Cove Base	White Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. EMSL recommends that samples reported as none detected or <1% undergo additional analysis via PLM to avoid the possibility of false negatives.

Samples analyzed by EMSL Analytical, Inc. Pineville, NC

Report amended: 04/06/2026 15:16:46 Replaces amended report from: 04/02/2026 15:22:39 Reason Code: Client-Additional Analysis



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Attention: Christy Smith
Compliance Centre, Inc.
920 Saint Andrews Rd
Columbia, SC 29210

Phone: (803) 315-5316

Fax: (803) 772-1435

Received Date: 04/01/2026 10:10 AM

Analysis Date: 04/02/2026 - 04/06/2026

Collected Date: 03/31/2026

Project: Manning Garden Apts

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
8C-Mastic 412602171-0082	White Cove Base	Tan Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
9C-Vinyl Composition Tile 412602171-0083	12x12 VCT	White Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
9C-Mastic 412602171-0084	12x12 VCT				
Insufficient Material					
10C-Cove Base 412602171-0085	Grey Cove Base	Brown Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
10C-Mastic 412602171-0086	Grey Cove Base	Beige Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
11C-Vinyl Composition Tile 412602171-0087	Blue 12x12 VCT	Black/Green Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
11C-Mastic 412602171-0088	Blue 12x12 VCT				
Insufficient Material					
12C-Vinyl Composition Tile 412602171-0089	Orange 12x12 VCT	Tan Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
12C-Mastic 412602171-0090	Orange 12x12 VCT				
Insufficient Material					
13C 412602171-0091	Carpet Glue	Yellow Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
Sample below method recommended minimum weight; analyzed at client's request.					
14C-Vinyl Composition Tile 412602171-0092	Bottom Layer VCT	Gray Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. EMSL recommends that samples reported as none detected or <1% undergo additional analysis via PLM to avoid the possibility of false negatives.

Samples analyzed by EMSL Analytical, Inc. Pineville, NC

Report amended: 04/06/2026 15:16:46 Replaces amended report from: 04/02/2026 15:22:39 Reason Code: Client-Additional Analysis



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Attention: Christy Smith
Compliance Centre, Inc.
920 Saint Andrews Rd
Columbia, SC 29210

Phone: (803) 315-5316

Fax: (803) 772-1435

Received Date: 04/01/2026 10:10 AM

Analysis Date: 04/02/2026 - 04/06/2026

Collected Date: 03/31/2026

Project: Manning Garden Apts

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
14C-Mastic 412602171-0093	Bottom Layer VCT				
Insufficient Material					
15C-Vinyl Composition Tile 412602171-0094	Dark Tan Peel/Stick VCT	Brown Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
15C-Mastic 412602171-0095	Dark Tan Peel/Stick VCT	Clear Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
16C-Vinyl Composition Tile 412602171-0096	VCT Under Hot Water Heater	Tan Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
16C-Mastic 412602171-0097	VCT Under Hot Water Heater	Black Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
17C 412602171-0098	12x12 VCT	Tan Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
20C 412602171-0099	Carpet Glue	Yellow/Clear Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
23C-Shingle 412602171-0100	Shingles/Felt	Black Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
23C-Felt 412602171-0101	Shingles/Felt	Black Non-Fibrous Homogeneous	100.0 Other	None	No Asbestos Detected
19C-Vinyl Composition Tile 412602171-0102	Bottom Layer 12x12	Gray/White Non-Fibrous Homogeneous	94.9 Other	None	5.1% Chrysotile
19C-Mastic 412602171-0103	Bottom Layer 12x12	Black Non-Fibrous Homogeneous	99.53 Other	None	0.47% Chrysotile
21C-Vinyl Composition Tile 412602171-0104	Bottom Layer 12x12	Tan/Beige Non-Fibrous Homogeneous	90.9 Other	None	9.1% Chrysotile

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. EMSL recommends that samples reported as none detected or <1% undergo additional analysis via PLM to avoid the possibility of false negatives.

Samples analyzed by EMSL Analytical, Inc. Pineville, NC

Report amended: 04/06/2026 15:16:46 Replaces amended report from: 04/02/2026 15:22:39 Reason Code: Client-Additional Analysis



EMSL Analytical, Inc.

10801 Southern Loop Blvd Pineville, NC 28134

Tel/Fax: (704) 525-2205 / (704) 525-2382

<http://www.EMSL.com> / charlottelab@emsl.com

EMSL Order: 412602171

Customer ID: COCE62

Customer PO:

Project ID:

Attention: Christy Smith
Compliance Centre, Inc.
920 Saint Andrews Rd
Columbia, SC 29210

Phone: (803) 315-5316

Fax: (803) 772-1435

Received Date: 04/01/2026 10:10 AM

Analysis Date: 04/02/2026 - 04/06/2026

Collected Date: 03/31/2026

Project: Manning Garden Apts

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
21C-Mastic	Bottom Layer 12x12	Black	99.53 Other	None	0.58% Chrysotile
412602171-0105		Non-Fibrous Homogeneous			
Insufficient Material					

19C and 21C analyzed via TEM per client request

Analyst(s)

Maggie Pasour (13)

Sarah Breneman (16)

Lee Plumley, Laboratory Manager
or other approved signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. EMSL recommends that samples reported as none detected or <1% undergo additional analysis via PLM to avoid the possibility of false negatives.

Samples analyzed by EMSL Analytical, Inc. Pineville, NC

Report amended: 04/06/2026 15:16:46 Replaces amended report from: 04/02/2026 15:22:39 Reason Code: Client-Additional Analysis



EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Chain of Custody

EMSL Order Number (Lab Use Only):

412602171

EMSL ANALYTICAL, INC.
200 ROUTE 130 NORTH
CINNAMINSON, NJ 08077
PHONE: (800) 220-3675
FAX: (856) 786-5974

Company: Compliance Centre, Inc.		EMSL-Bill to: ☒ Same ☐ Different If Bill to is Different note instructions in Comments**	
Street: 920 St Andrews Road		Third Party Billing requires written authorization from third party	
City: Columbia	State/Province: SC	Zip/Postal Code:	Country: US
Report To (Name): Christy Smith		Telephone #: 8037721430	
Email Address: christy@compliancecentre.net		Fax #:	Purchase Order:
Project Name/Number: <u>Manning Garden Apts</u>		Please Provide Results: ☐ Fax ☒ Email ☐ Mail	
U.S. State Samples Taken: sc		Connecticut Samples: ☐ Commercial ☐ Residential	
Turnaround Time (TAT) Options* - Please Check			
☐ 3 Hour ☐ 6 Hour ☒ 24 Hour ☐ 48 Hour ☐ 72 Hour ☐ 96 Hour ☐ 1 Week ☐ 2 Week			
*For TEM Air 3 hr through 6 hr, please call ahead to schedule. There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide			
PCM - Air ☐ Check if samples are from NY ☐ NIOSH 7400 ☐ w/ OSHA 8hr. TWA PLM - Bulk (reporting limit) ☒ PLM EPA 600/R-93/116 (<1%) ☐ PLM EPA NOB (<1%) Point Count ☐ 400 (<0.25%) ☐ 1000 (<0.1%) Point Count w/Gravimetric ☐ 400 (<0.25%) ☐ 1000 (<0.1%) ☐ NYS 198.1 (friable in NY) ☐ NYS 198.6 NOB (non-friable-NY) ☐ NIOSH 9002 (<1%)		TEM - Air ☐ 4-4.5hr TAT (AHERA only) ☐ AHERA 40 CFR, Part 763 ☐ NIOSH 7402 ☐ EPA Level II ☐ ISO 10312 TEM - Bulk ☒ TEM EPA NOB ☒ NYS NOB 198.4 (non-friable-NY) ☐ Chatfield SOP ☐ TEM Mass Analysis-EPA 600 sec. 2.5 TEM - Water: EPA 100.2 Fibers >10µm ☐ Waste ☐ Drinking All Fiber Sizes ☐ Waste ☐ Drinking	
TEM - Dust ☐ Microvac - ASTM D 5755 ☐ Wipe - ASTM D6480 ☐ Carpet Sonication (EPA 600/J-93/167) Soil/Rock/Vermiculite ☐ PLM CARB 435 - A (0.25% sensitivity) ☐ PLM CARB 435 - B (0.1% sensitivity) ☐ TEM CARB 435 - B (0.1% sensitivity) ☐ TEM CARB 435 - C (0.01% sensitivity) ☐ TEM Qual. via Filtration Technique ☐ TEM Qual. via Drop-Mount Technique Other: TEM the third sample marked ☐ with * if PLM is negative			
☒ Check For Positive Stop - Clearly Identify Homogenous Group		Filter Pore Size (Air Samples): ☐ 0.8µm ☐ 0.45µm	
Samplers Name: Shane Halvorson		Samplers Signature:	
Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
1A-M	Sheetrock / texture ceiling		3/31/26
2A-M	Sheetrock / texture walls		c 10am
3A-C*	Brown couchbase		
4A-C*	Linoleum		
5A-C*	LVP - grey		
6A-C*	Black couchbase		
7A-C*	12x12 VCT		
8A-C*	White couchbase		
Client Sample # (s):		Total # of Samples:	
Relinquished (Client):		Date:	Time:
Received (Lab): <u>UPS</u>		Date: 4/1/26 10:10	FL Time: 7/16/21 25543
Comments/Special Instructions: *TEM 3rd sample of NOB is first 2 PLM are negative			

412002171

Page 2 of 2