



ASBESTOS-CONTAINING MATERIAL  
OPERATIONS & MAINTENANCE PROGRAM  
NORTHGATE MANOR  
220 BIBLEBROOK DRIVE  
GREER, SOUTH CAROLINA

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PREPARED FOR:  
NORTHGATE MANOR  
220 BIBLEBROOK DRIVE  
GREER, SOUTH CAROLINA

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Kimberly L. Dingle  
AHERA Management Planner

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Signature

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Keith Bayer  
Managing Director of Environmental Services

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Signature

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## 1.0 Introduction

The purpose of this Asbestos-Containing Material Operation and Maintenance (O&M) Program is to develop a strategy to manage asbestos-containing materials (ACM) within the Northgate Manor, located at 220 Biblebrook Drive in Greer, South Carolina. This plan shall provide safety procedures that will prevent the creation of airborne asbestos fibers, protect employees who may accidentally impact or disturb ACM during their job activities, and prevent building contamination from asbestos fiber release. This O&M Program provides practices and procedures that comply with applicable regulatory requirements and guidance regarding operations and maintenance activities that impact ACM.

### 1.1 Site Specific Asbestos Concerns

The subject property consists of six (6) two-story multi-family apartment structures and one (1) single-story maintenance garage constructed in 1969. The subject property structures contain a total of forty-six (46) residential dwelling units. According to a comprehensive pre-renovation asbestos survey conducted by Mr. Timothy Quint, a State of South Carolina licensed Asbestos Building Inspector (license #BI-002688) with One Source Environmental, LLC (OSE), on October 7-8, 2024, vinyl flooring materials and associated mastics, vinyl stair tread materials and associated mastics and ceramic floor tile grout were presumed to contain asbestos. The presumed ACMs are considered to be non-friable (not able to be crushed via hand pressure) materials and were observed in good condition. Activities which may impact the identified asbestos-containing materials are not permitted to be done by untrained maintenance personnel or tenants of the facility.

### 1.2 O&M Program Objectives

This Asbestos Operations and Maintenance Program for the Northgate Manor, located at 220 Biblebrook Drive in Greer, South Carolina, is intended to manage known asbestos-containing building materials located within the facility.

The site maintenance personnel and other trades conducting work practices at the subject property will be subjected to the Occupational Safety and Health Administration (OSHA) asbestos regulations. According to the regulations, ownership/management of a building that contains known or presumed asbestos-containing materials presents notification and training responsibilities under the OSHA asbestos standards. The recommendation was made to monitor the presumed asbestos-containing materials under an Operation and Maintenance (O&M) Program. This O&M Program is being established to prevent asbestos fiber release episodes through:

- Establishing safe practices for both routine and emergency maintenance activities involving areas containing ACM.
- Training of property managers and service personnel, including custodial and maintenance workers, to establish the proper awareness and understanding of work practices vital to the success of this program.



- Notification of contractors and trades who may come into contact with identified and/or presumed ACM through the distribution of a "letter of notification" (See Appendix G).
- Site-specific maintenance/repair procedures, which include special cleaning procedures and a permit system for any work which, may disturb ACM in the subject buildings.
- Emergency response procedures in the event of accidental dislodging of ACM managed by the responsible site maintenance supervisor.
- Periodic monitoring/surveillance, which includes the completion of an ongoing inspection of ACM condition and monthly completion of a checklist for ACM condition, semi-annual re-inspection of the ACM area, and air monitoring for fiber levels upon a major release episode.
- This program includes central record-keeping where copies of completed forms, this program, the original asbestos survey, and all periodic monitoring/surveillance reports are kept.
- Provisions for maintaining the ACM in as good a condition as possible.

## 2.0 Overview of the O & M Program

### 2.1 Purpose

Mr. Timothy Quint, a State of South Carolina licensed Asbestos Building Inspector (license #BI-002688) with One Source Environmental, LLC (OSE), performed a pre-renovation asbestos survey at the subject property on October 7-8, 2024. The scope of the survey included an evaluation of interior and exterior building components for asbestos content in preparation for renovation activities. Flooring materials were excluded from the scope of sampling as they are not anticipated to be impacted during renovation activities. Sampling was conducted in accordance with the EPA National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 763 Subpart M, the ASTM Standard Practice for Comprehensive Asbestos Building Surveys Designation: E 2356-18 (ASTM E 2356-18) for Baseline Surveys, and State of South Carolina asbestos regulations. In accordance with South Carolina asbestos regulations, all units were inspected. Sampled materials included drywall, joint compound, textured ceiling materials, ceramic wall tile grout, duct mastics, vinyl covebase materials and associated mastics (office), interior and exterior caulking materials and roofing materials. Samples were analyzed via Polarized Light Microscopy (PLM) via EPA Method 600/M4-82-020. In addition, in accordance with ASTM E 2356-18 and South Carolina asbestos regulations, the laboratory analyzed via Transmission Electron Microscopy (TEM) the third sample of each non-friable organically bound (NOB) material (vinyl covebase materials and associated mastics, duct mastics, caulking materials and roofing materials) which was not identified as an ACM via PLM analysis of the first two samples. A total of two hundred and fifty-eight (258) samples were collected with a total of two hundred and sixty-seven (267) sample layers being analyzed via PLM and forty-five (45) sample layers being analyzed via TEM. An ACM is defined as containing greater than 1% asbestos. None of the sampled materials were identified to contain asbestos. However, the following materials were assumed to contain asbestos:





#### Buildings A, B and D

- Vinyl plank flooring materials and associated mastics throughout units (except bathrooms)
- Vinyl stair treads and associated mastics in unit stairwells
- Vinyl flooring materials and associated mastics in select unit bathrooms
- Beige grout associated with 12" ceramic floor tile in select unit bathrooms

#### Buildings C and F

- Vinyl plank flooring materials and associated mastics throughout units (except bathrooms)
- Vinyl stair treads and associated mastics in unit stairwells
- Beige grout associated with 12" ceramic floor tile in unit bathrooms

#### Building E

- Vinyl plank flooring materials and associated mastics throughout units (except bathrooms)
- Vinyl floor tile and associated mastic in Unit 36 Utility closet
- Beige grout associated with 12" ceramic floor tile in unit bathrooms and office bathrooms
- Vinyl floor tiles and associated mastics in office kitchen, storage room and hallway

#### Maintenance

- Vinyl floor tile and associated mastics throughout structure

The vinyl flooring and stair tread materials and associated mastics and ceramic floor tile grout are considered to be non-friable (not able to be crushed via hand pressure) materials and were observed to be in good condition at the time of the inspection. If the renovation plans change to impact these materials, proper sampling should be performed in accordance with State of South Carolina asbestos regulations.

The O&M Program provides practices and procedures that comply with applicable regulatory requirements and guidance regarding operations and maintenance activities that impact ACM. Included in the O&M Program are the basic requirements for implementing an O&M Program, including identification of the locations and types of ACM present, applicable regulations and guidance, personnel responsibilities, and how to select and use safe work practices. The appendices includes: a glossary of terms, O&M work practices, Program Manager decision-making flowchart, permit forms, Program Manager Checklist, and notification forms. The O&M Program assigns and outlines the responsibilities for an O&M Program Manager who oversees and assures the O&M Program implementation, and supervises the maintenance and custodial personnel who are designated to perform O&M activities. The O&M Program also provides work practices and procedures for the Program Manager and maintenance or custodial personnel to follow when managing or handling ACM.

The following regulatory standards and guidance documents were used in the development of the O&M Program.

#### Occupational Safety and Health Administration (OSHA) Regulations

- 29 CFR §1910 OSHA General Industry Standards



- 29 CFR §1926 OSHA Construction Standards

#### United States Environmental Protection Agency (USEPA) Regulations

- 40 CFR §763 Asbestos Hazard Emergency Response Act (AHERA)
- 40 CFR §61 National Emission Standards for Hazardous Air Pollutants (NESHAP)

#### Other Guidance Documents

- The National Institute of Building Sciences (NIBS) *Asbestos Operations and Maintenance Work Practices-Guidance Manual*, September, 1992
- The U.S. Environmental Protection Agency (EPA) *Managing Asbestos in Place; A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*, May 1990
- The U.S. Environmental Protection Agency (EPA) *Guidance for Controlling Asbestos-Containing Materials in Buildings*, 1985

## 2.2 Asbestos Background Information

Asbestos is the generic term for a group of naturally occurring fibrous minerals with high tensile strength, flexibility and resistance to thermal, chemical, and electrical conditions. Asbestos fibers have been documented to present health risks. Asbestos fibers enter the body through inhalation or ingestion and become embedded in the tissues of the respiratory or digestive systems. Exposure to asbestos can cause numerous diseases, including asbestosis, an emphysema-like condition, lung cancer, mesothelioma, and gastrointestinal cancer. The symptoms of these diseases generally do not appear for 20 or more years after initial exposure.

Buildings constructed prior to 1981 may contain significant amounts of asbestos building materials. Thermal system insulation (TSI), sprayed or troweled-on surfacing materials, and vinyl or asphalt flooring installed before 1981 are particularly likely to contain asbestos. Asbestos can also be present in pipe and boiler insulation materials and in sprayed-on or troweled-on surfacing materials on walls, ceilings, beams, crawlspaces, and between walls. Suspect materials are typically grouped into two categories: friable (able to be crushed or pulverized by hand pressure) and non-friable. Additionally, those materials that are typically non-friable in their normal usage, such as floor tile, may be considered potentially friable. This means that they may be subjected to mechanical abrasion activities (e.g. floor sanding), which could cause them to become friable. Such suspect materials and their typical application are identified in the U.S. Environmental Protection Agency (EPA) document entitled, "Guidance for Controlling Asbestos-Containing Materials in Buildings, 1985 Edition".

It should be emphasized to all concerned employees and personnel that the presence of asbestos-containing materials within the building does not create an exposure risk to building employees and tenants. Asbestos-containing materials introduce an exposure risk only when the materials have been disturbed and the fibers are released and become airborne. These releases normally do not occur, but may occur if the ACM is accessible and friable (easily crumbled with hand pressure), or when non-friable ACM is incorrectly handled by actions such as drilling, sanding, or cutting the material. Asbestos-containing materials in a building could be impacted or disturbed during the performance of building activities related to maintenance, repair, renovation and alteration projects. This O&M Program is being implemented in order to prevent these situations from occurring.



## 2.3 Site Specific Information

PROPERTY DESCRIPTION: Northgate Manor  
220 Biblebrook Drive  
Greer, South Carolina

## 3.0 Regulatory Requirements

The O&M Program for the subject property requires strict adherence to local, state and federal regulations. This section highlights the key standards applicable to this site-specific O&M program.

### 3.1 OSHA Standards

The asbestos in construction standard - OSHA 29 CFR §1926.1101 and asbestos in general industry standard - 29 CFR §1910.1001, specify worker protection requirements for employees exposed to ACMs. "Employees" includes any individual, contractor, or sub-contractor engaged to perform work. The more stringent of these regulations (typically 29 CFR §1926.1101) shall be applied to the staff at the Northgate Manor.

Custodial workers or other employees who perform housekeeping and clean waste, debris and accompanying dust in an area containing visibly deteriorated ACMs or PACMs within any of the units and common areas may be exposed. Many small-scale maintenance activities, repair, installation, or modification projects in buildings constructed prior to 1981 may cause exposure to workers. If these activities disrupt the matrix, crumble, pulverize, or generate visible debris from ACM (not to exceed an amount contained in a 60 inch by 60 inch glovebag), they are examples of Class III work under the construction standard.

#### 3.1.1 Asbestos in Construction (29 CFR §1926.1101)

The OSHA Construction Industry Asbestos Standard (29 CFR §1926.1101), is applicable for the workers who perform activities discussed in the O&M Program. The intent of the standard is to protect the health of employees from significant exposures to asbestos and to educate the employees on health hazards associated with ACMs.

In general, 29 CFR §1926.1101 applies to all construction work where an employee may be occupationally exposed to asbestos. The standard applies to any employee involved in repair, maintenance, alteration, or renovation activities where ACMs are involved. Persons who clean up ACM spills are also covered by this regulation. For purposes of this O&M Program, it shall be assumed that 29 CFR §1926.1101 is applicable for all O&M activities.

#### 3.1.2 Asbestos in General Industry (29 CFR §1910.1001)

29 CFR §1910.1001 is the General Industry Asbestos Standard. Compliance with 29 CFR §1926.1101 is generally required for operations and maintenance activities involving asbestos. It is the responsibility of the Program Manager to obtain appropriate clarification from the local



OSHA office in situations where the application of either standard appears to be ambiguous.

### 3.1.3 Hazard Communication in Construction (29 CFR §1926.59)

This is OSHA's construction industry hazard communication standard. This standard is applicable to all employees with the potential to be exposed to any hazardous chemical, including asbestos. This standard requires the communication of chemical and physical hazards to employees in the construction sector. Aspects of this regulation are included in 29 CFR §1926.1101 and 29 CFR §1910.1001.

### 3.1.4 Hazard Communication in General Industry (29 CFR §1910.1200)

This is OSHA's general industry hazard communication standard. This standard is similar to the construction industry hazard communication standard (29 CFR §1926.59) and applies to all employees with the potential to be exposed to chemical and physical hazards in the general industry sector. Aspects of this regulation are included in 29 CFR §1926.1101 and 29 CFR §1910.1001.

### 3.1.5 Respiratory Protection in Construction (29 CFR §1926.246)

29 CFR §1926.246 is OSHA's construction industry respiratory protection standard. This standard is applicable to all employees who are required or choose to wear respiratory protection devices. The intent of the standard is to control occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors. This standard requires the establishment of a written respiratory protection program whenever employees are required or choose to wear respirators. Aspects of this regulation are included in 29 CFR §1926.1101 and 29 CFR §1910.1001.

### 3.1.6 Respiratory Protection in General Industry (29 CFR §1910.134)

29 CFR §1910.134 is OSHA's general industry respiratory protection standard. This standard is similar to 29 CFR §1926.102 and is applicable to all employees who are required or choose to wear respiratory protection devices. The intent of the standard is to control occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors. Aspects of this regulation are included in 29 CFR §1926.1101(h) and 29 CFR §1910.1001(g).

## 3.2 USEPA Standards

Applicable USEPA standards for asbestos O&M programs are limited to the AHERA standard (40 CFR §763) and the NESHAP standard (40 CFR § 1). The AHERA standard in its entirety is not applicable to residential facilities; however, portions of the standard outline specific guidance and state of the art work practices for performing asbestos emergency response actions, re-inspections, record keeping, training and implementation of an O&M Program. Pertinent aspects of the AHERA standard are included in this O&M Program.



### 3.2.1 NESHAP (40 CFR §61) Standards

NESHAP provides standards concerning the application, removal, and disposal of ACM associated with renovation projects in all facilities. NESHAP requirements generally do not affect O&M practices since they are triggered by demolition or renovation activities that typically involve greater than 260 linear feet or 160 square feet of ACM. However, the Project Manager may be required to fulfill NESHAP requirements if an asbestos abatement contractor is employed to remove larger quantities of ACM. NESHAP includes requirements for inspection, notification, work practices, such as handling, packaging and disposal of wastes, air emissions controls, and labeling. NESHAP may require ACM to be removed before beginning renovation activities.

### 3.3 State of South Carolina Standards

The State of South Carolina has adopted the Federal EPA and OSHA regulations regarding asbestos-containing materials. These regulations must be strictly adhered to while performing asbestos activities within the State of South Carolina. Please note that within the State of South Carolina if greater than 160 square feet or 260 linear feet or 35 cubic feet of regulated asbestos-containing material (RACM) is affected, then the persons conducting the work must be licensed by the South Carolina Department of Health and Environmental Control Bureau of Air Quality. RACM includes all friable asbestos materials, and/or non-friable asbestos materials that have become friable due to sanding, grinding, cutting or abrading. Staff at the Northgate Manor is not allowed to conduct activities that affect greater than the South Carolina *de minimus* standard.

## 4.0 Responsibilities

### 4.1 General Management Company Responsibilities

The following sections describe the roles and responsibilities for the personnel involved in implementing the O&M Program for the subject property. There are two essential personnel classifications necessary to effectively implement this site-specific O&M Program:

- (1) The Program Manager who administers the program
- (2) The Maintenance Workers who perform the O&M work practices

The OSHA asbestos standards require employers to take certain steps to guard against hazardous exposures to asbestos. These steps include making an exposure assessment, notifying employees about asbestos in the workplace, posting signs, establishing regulated areas, providing employee training providing supervision by specially trained personnel, providing protective clothing and equipment, compiling records, and instituting medical surveillance of exposed workers. The particular requirements that apply depend on the nature and extent of the work, the materials involved, and the results of an exposure assessment. The standards additionally require building owners to take steps to identify asbestos-containing materials in their buildings, to keep records about the presence, location, and quantity of known or presumed



asbestos-containing materials, to post signs identifying areas of possible exposure to asbestos, and to notify employees, tenants, contractors, and other employers of the presence of known or presumed asbestos-containing materials to which workers may be occupationally exposed.

OSHA compliance requirements, pertaining to known and presumed asbestos-containing materials at the subject property (Northgate Manor), include the following:

(1) GENERAL OBLIGATIONS OF ALL PRE-1980 BUILDING OWNERS

All owners of buildings constructed prior to 1980 must take the following steps:

- Identify potential asbestos hazards
- Keep records about potential asbestos hazards
- Post signs to warn of potential asbestos hazards
- Communicate information about potential asbestos hazards

(2) IDENTIFY POTENTIAL ASBESTOS HAZARDS

Before work subject to the standards has begun, the owner must identify the presence, location, and quantity of asbestos-containing materials (ACM) or presumed asbestos-containing materials (PACM). Thermal system insulation, surfacing materials, and resilient flooring materials must be presumed to contain asbestos, if installed in a building prior to 1981, unless proven otherwise. The presumption of asbestos content in these materials can be rebutted if the building owner/management can obtain proof that the material is not asbestos-containing material, or contains less than 1% asbestos. Such proof may be obtained either by an inspection conforming to the requirements of the EPA AHERA standard or by tests of bulk samples of the material in question. The data relied upon to rebut the presumption of asbestos content must be maintained with permanent building records.

(3) RECORDKEEPING:

The management staff at the Northgate Manor is required to create and keep (for as long as the building is managed by the current management company) a record that identifies the presence, location, and quantity of known or presumed asbestos-containing materials in the building. This is the basic recordkeeping requirement. Additional recordkeeping requirements apply if the building owner/management has employees who are potentially exposed to an asbestos hazard in the course of construction, renovation, or repair activities.

(4) POST SIGNS:

The building owner/management must post warning signs in or near areas where there is known or presumed asbestos-containing materials which are being or could be impacted where there is the potential for exposure. The signs must be posted at a distance that will allow workers to read them and take protective steps before entering the area marked by the signs. The signs must read:



DANGER  
ASBESTOS  
CANCER AND LUNG DISEASE HAZARD  
AUTHORIZED PERSONNEL ONLY

Warning labels must be affixed, if feasible, to known or presumed asbestos-containing materials and to all known or presumed asbestos-containing scrap, waste, debris, raw materials, or to their containers. The warning labels must read:

DANGER  
CONTAINS ASBESTOS FIBERS  
AVOID CREATING DUST  
CANCER AND LUNG DISEASE HAZARD

(5) COMMUNICATE INFORMATION:

The staff at the subject property must inform employees of the presence, location and quantity of asbestos-containing materials if the materials have the potential to be accessed, impacted or disturbed during work activities. In addition, the Northgate Manor staff must also inform the employers (such as custodial service contractors) of employees who do work in the site buildings and who may reasonably be expected to contact asbestos-containing materials in the course of their work.

Before any construction activity, including maintenance, repair or remodeling, that involves disturbance or removal of asbestos-containing material is undertaken, the Northgate Manor Staff must provide information identifying the presence, location and quantity of asbestos-containing materials in the site buildings to all employees who will work in or adjacent to the worksite; to any employers of employees who will work in or adjacent to areas containing asbestos; to prospective employers who reasonably can be expected to work in or adjacent to those areas; and, to tenants who occupy work areas. The Northgate Manor Staff must provide information about the presence, location, and quantity of known or presumed asbestos-containing materials to construction contractors or other employers who apply for, bid for, or do work in or adjacent to areas containing known or presumed asbestos-containing materials.

#### 4.2 Program Manager

The Program Manager is responsible for implementation of the O&M Program and for the review of all work performed under the O&M Program. The specific responsibilities of the Program Manager includes but are not limited to:

- Identify potential asbestos hazards within work areas by having asbestos inspections completed.
- Maintaining records on asbestos location and condition.
- Establish a program for asbestos material surveillance and re-inspections.
- Inform building occupants and workers of asbestos locations and potential hazards.





- Keep records on: 1) potential asbestos hazards including asbestos locations and conditions; 2) worker training and medical monitoring; and 3) periodic re-inspections, exposure assessments, and air monitoring activities.
- Ensure all workers have the proper medical monitoring and maintain the medical records for a period of employment plus 30 years.
- Ensure all personal protective equipment is in good repair and is available for worker use.
- Ensure all maintenance workers who perform work in ACM areas have the proper training for the task and are utilizing the proper personal protective equipment.
- Establishing safe O&M work practices.
- Establish O&M response actions.
- Establishing a hazard communication program.
- Assigning supervisor, worker, and competent person responsibilities regarding O&M work practices.
- Hire asbestos abatement contractors as needed.
- Ensure all work is completed in accordance with all applicable federal, state, and local regulations, ordinances, and laws.

The following sections provide additional information regarding the Program Manager's responsibilities.

#### 4.2.1 Exposure Assessments/Air Monitoring

This O&M program is intended to restrict all employees from performing activities that would potentially expose them to elevated levels of asbestos fibers. Prior to maintenance personnel performing a work activity, which has the potential to create airborne asbestos fibers, or destructive activities on an asbestos-containing material, an exposure assessment is required. An exposure assessment is an accurate determination, using air monitoring, of the airborne concentrations of asbestos to which employees may be exposed. Typically, an industrial hygiene consultant will conduct exposure assessments. Exposure assessments are required by 29 CFR §1926.1101(f) for all construction and O&M activities that impact ACM, unless it can be shown by objective data that in the worst case scenario the ACM or activity are such that there cannot be a release of airborne fibers in excess of the time weighted average (TWA). The purpose of performing exposure assessments is to prevent employees from being exposed to airborne asbestos concentrations in excess of the permissible exposure limit (PEL). The PEL is the OSHA exposure limit for asbestos and is designed to prevent employees from unnecessary risks from with asbestos exposure.

Exposure assessments must be task, material type, and condition (material condition and environmental condition) specific. For example, cleanup of broken floor tiles and clean-up of damaged ceramic tile grout may both be "clean-up activities", however not of the same material; and therefore, these two tasks would require separate exposure assessments. However, exposure assessment documentation may be reused for individual O&M activities if the tasks, conditions and material type "closely resemble" each other and the exposure assessment data for the activity are less than one year old. Therefore, the exposure assessment information for a floor tile cleanup activity may be used for every floor tile cleanup activity, provided the same work practices are used and the conditions and material type remain consistent. Additionally, the exposure assessment may be applied to all similar activities involving





the same material if it can be shown objectively that the exposure potential is less severe than the documented activity.

The Program Manager shall document all exposure assessments and all objective decisions not to perform new exposure assessments. When documenting exposure assessments, the Program Manager shall retain all pertinent documentation including, but not limited to, the specific task, material type and condition, date of the activity, the name of the employee(s), the results of the exposure assessment, and in applicable cases, the objective data and basis for not performing an exposure assessment.

#### Exposure Limits

Although the OSHA PEL for asbestos is 0.1 fiber per cubic centimeter of air (f/cc), the O&M Program personnel and contractors performing work under this O&M Program shall not be exposed to asbestos concentrations in excess of one tenth of the PEL, or 0.01 f/cc, in the breathing zone. If respiratory protection is utilized, the asbestos concentration behind the mask (i.e., the actual breathed concentration) shall not exceed 0.01 f/cc. The Program Manager shall ensure that asbestos exposures do not exceed the 0.01 f/cc limit.

#### 4.2.2 Selection and Use of Personal Protective Equipment

The following is a description of personal protective equipment (PPE) and guidance for the Program Manager in the selection and use of PPE for activities performed under this O&M Program. The Program Manager for the site shall select the appropriate PPE for the individual O&M work practice, taking into consideration regulatory requirements and other requirements found in this O&M Program. It should be noted that to utilize respiratory protection, an individual must acquire medical permission, be under a medical surveillance program, and be properly fit tested of his/her personnel respirator. In addition, to address emergency repairs involving asbestos-containing materials, OSHA requires the proper training of personnel involved in such activities.

#### Respirators

The use of respirators may be necessary to perform O&M activities. For decision-making purposes, the Program Manager shall require respirators for all O&M activities unless the Program Manager determines that there is no potential for disturbance of the ACM, or that the potential ACM disturbance will not result the release of asbestos fibers into the air in excess of 0.01 f/cc. Before the Program Manager allows the use of respirators under this O&M Program, a written respiratory protection program must be established in accordance with 29 CFR §1926.246. The Program Manager shall contract the services of a qualified consultant to develop or assist in the development of the respiratory protection program.

Respirators used for O&M activities shall be selected based on the requirements of 29 CFR §1926.1101(h). Protection factors shall be taken into account when respirators are selected. Names of employees and their corresponding respirator type and size shall be documented and archived by the Program Manager. The Program Manager shall ensure that workers are wearing respirators properly and maintaining them in a fashion to protect the integrity of the respirator. The Program manager shall also verify that the employees are utilizing respirators in the proper applications and are aware of the purpose and limitations of the respirator.



### Protective Clothing

In addition to respiratory protection, the Program Manager must provide employees with protective clothing to prevent employee exposures and to prevent the cross contamination of other areas and persons. Protective clothing may include disposable coveralls, gloves, hats, shoe coverlets, and eye and face protection. Used disposable overalls will be disposed of as asbestos waste. Re-usable overalls shall not be allowed for asbestos O&M activities. The Program Manager is responsible for ensuring that contaminated protective clothing is disposed of and is placed in a closed container in a designated change area.

#### 4.2.3 Medical Surveillance

The Program Manager shall determine if medical surveillance is required for the persons working under this O&M Program. Medical surveillance is required under 29 CFR §1926.1101 for employees who: are engaged in Class I, II, or III work for more than 30 days per year, are exposed above the PEL (at any time), or wear negative pressure respirators.

If medical surveillance is required for any employee, the Program Manager shall establish a medical surveillance program per 29 CFR §1926.1101(m). The medical surveillance program shall be designed to determine the employee's fitness to wear a respirator under the working conditions required for O&M activities and to monitor any changes in the employee's pulmonary or gastrointestinal systems. Components of a typical medical surveillance program include:

- Initial and (annual) examinations that meet the content and frequency requirements of 29 CFR §1926.1101(m)(2)(i) and (ii);
- Information provided to the examining physician including copies of the OSHA standard, job description, expected exposure levels, previous medical results, and PPE that the employee will be required to wear; and,
- Physician's written opinions that verify the employee's ability to perform the intended duties and ability to wear a respirator, as well as any restrictions to the employee's ability to perform the job.

#### 4.2.4 Work Scheduling and Worker Assignments

The Program Manager shall coordinate the O&M activities that are performed by maintenance staff as well as coordinating projects that are performed by an asbestos abatement contractor. This includes the specific responsibility of carrying out or assigning supervisor responsibilities related to O&M work practices. The Program Manager shall approve of the selected practice before work begins (Section 5.0). This O&M Program requires that all personnel involved in the O&M Program have the appropriate training and experience to perform their jobs and to carry out their responsibilities. Whenever possible, the Program Manager shall schedule workers to perform O&M activities during times when tenants will be vacated from the premises. If this is not possible, the Program Manager will attempt to reduce potential building occupant exposures to ACM fibers during work procedures to the fullest extent possible.

#### 4.2.5 Notification

The Program Manager is responsible for fulfilling all notification requirements mandated by regulatory agencies and this O&M Program. Notification documents such as letters,



memorandum, notices, etc. shall be included as a permanent part of the O&M archive. Notification is required by 29 CFR §1926.1101(k)(ii) to be given to all employees and contractors who may be exposed to ACMs. In addition, all persons who have the potential to impact identified asbestos-containing material require written notification. The written notification document shall include a general description of the hazards associated with asbestos exposure, and the locations and quantities of the ACMs on the property. An example of a notification letter is provided in Appendix G. In addition to personnel notification, there is an EPA NESHAP requirement to notify the appropriate agency when abatement activities affect large quantities of ACM.

#### 4.2.5.1 Building Occupants

The Program Manager is not required to notify building occupants of the presence of ACM, as long as they do not have the means or potential to impact the identified asbestos containing materials. However, notification to building occupants is required if the occupants have the ability and authorization to perform routine maintenance activities within their respective units.

Building occupants shall also be notified of renovation and O&M activities that may impact ACMs, if such work will be conducted in areas potentially accessible to the employees or tenants. In emergency abatement situations, an Emergency Notification Form shall be provided to the building occupants. An example of the Emergency Notification Form is provided in Appendix G.

#### 4.2.5.2 Contractors - Vendors

Before authorized contractors begin work in areas in which ACMs are present at the Northgate Manor, the Program Manager shall notify the following persons, in writing, of the presence, location and quantity of ACM or presumed ACM (PACM) in the buildings.

- Prospective contractors bidding for work whose employees can reasonably be expected to work in or adjacent to areas containing ACM
- Custodial and maintenance employees who will work in or adjacent to areas containing ACM

The Program Manager shall provide copies of, or access to, the O&M Program for all contractors hired to work in building(s) covered by the O&M Program.

#### 4.2.5.3 Federal, State and Local Agency Notifications

The Program Manager shall ensure compliance with any state or local notification requirements. There are currently no federal regulatory requirements mandating notifications for maintenance activities as long as they are not regulated under the NESHAP requirements. This O&M Program is limited, so that any activities requiring federal notification must be performed by a licensed abatement contractor. The Program Manager shall comply with all state and local regulatory notification requirements when abatement by contracted abatement firms meets the NESHAP threshold. NESHAP notification is required if greater than 160 square feet or 260 linear feet or 35 cubic feet is disturbed. This notification will be performed by the Program Manager according to 40 CFR §61.145(b).



#### 4.2.6 Hazard Communication

Hazard communication (Hazcom) is an OSHA regulatory requirement (29 CFR §1926.59) that specifies training in the recognition and prevention of chemical hazards, including asbestos. Hazard communication is generally provided only to those employees and contractors who are expected to work with or be exposed to asbestos. The Program Manager shall ensure that all O&M staff receives Hazcom training in accordance with 29 CFR §1926.59 and 29 CFR §1926.1101. It is the responsibility of the Program Manager to inform all contractors who have the potential to come in contact with asbestos of the potential ACM hazards associated with their work and provide a copy of the O&M program to the contractor as necessary. The Hazcom program shall include a hazard determination, a written hazcom program, use of warning labels, inventorying of Material Safety Data Sheets (MSDS), and proper employee training.

#### 4.2.7 Selection of Materials

The Program Manager shall select the products and materials utilized in performance of activities allowed under this O&M Program. The Project Manager shall disallow any materials or machinery that when used will abrade, damage ACMs or PACMs, or result in a release of asbestos fibers.

#### 4.2.8 Training

Personnel participating in the O&M Program for the Northgate Manor must be knowledgeable of the appropriate work practices and risks associated with their activities. All workers and the Program Manager shall have appropriate certifications, licenses, and other qualifications relevant to the type of work in which they will be engaged, according to local, state, federal, and other regulatory requirements. The Program Manager must ensure all training is completed in accordance with the new OSHA asbestos standards (29 CFR 1926.1101 and 1910.1001) and the AHERA standards (40 CFR 763.92). The Program Manager shall ensure that all personnel are appropriately trained. Training shall be provided prior to, or at the time of, initial assignment and shall emphasize hands-on methods. The workers shall learn how to use the O&M Program as well as to perform specific tasks. Training is to be conducted by a competent person. Two hour awareness training is required for the maintenance/custodial staff once a year. The Program Manager shall contact the appropriate federal, state or local OSHA offices to obtain a listing of acceptable training providers.

##### 4.2.8.1 Worker Training

Workers assigned to perform O&M activities shall have training and experience in the techniques required for the type of work to be performed, the O&M program for the facility, and building conditions specific to the Northgate Manor. The Program Manager shall institute a training program for all employees who are likely to perform OSHA Class III or IV work (29 CFR §1926.1101(g)(10)). All workers are required to have the appropriate training within 60 days of employment. Training for employees performing Class III and IV operations shall be consistent with EPA requirements for training of maintenance and custodial staff as set forth at 40 CFR §763.92(a)(1-2). This course shall include instruction in the recognition of damage, deterioration, and delamination of ACMs. Employees shall also be trained on the locations of ACM at the



property. This training course shall be at least 16 hours in duration for Class III work and 2 hours in duration for Class IV work. The training program shall cover the following topics.

- Methods of recognizing asbestos, including how to presume that certain building materials contain asbestos.
- The health effects associated with asbestos exposure. The relationship between smoking and asbestos in producing lung cancer.
- The nature of operations that could result in exposure to asbestos. The importance of necessary protective controls to minimize exposure including, as applicable, work practices, respirators, housekeeping procedures, protective clothing, emergency procedures, and waste disposal procedures, and any necessary instruction in the use of these controls and procedures.
- The purpose, proper use, fitting instructions, and limitations of respirators.
- The appropriate work practices for performing an approved response action.
- Medical surveillance program requirements.
- The requirements for posting signs and affixing labels, and the meaning of the required legends for such signs and labels.

#### 4.2.8.2 Program Manager Training

The Program Manager shall be trained in: practices for reducing asbestos exposures, use of wet abatement methods, the identification of potential ACM, condition assessment of asbestos-containing materials, potential exposure evaluations, understanding building components, building systems, building usage patterns, conducting O&M activities, cleaning and maintenance tasks, applicable laws and regulations, and the contents of this site-specific O&M Program. At a minimum, this training shall include the 16 hour training required under 40 CFR §763.92(a)(2) and successful completion of the two-day AHERA (40 CFR §763.92) "Management Planner" course. However, it is recommended that the Program Manager also complete the 40 hour AHERA "Supervisor" training and the "Management Planner" training.

#### 4.2.9 Material Re-inspections

The Program Manager shall ensure that all previously identified ACM are re-inspected every six months. In addition, material re-inspections should be completed before and following maintenance or renovation activity. The re-inspection shall include damage assessments of the ACM, taking into account material conditions during previous inspections. The material shall be classified as being in good condition, damaged, or significantly damaged. In the event an ACM is categorized as being significantly damaged, this material must be removed. Designated O&M activities for significantly damaged ACM are required to be completed within sixty days of the discovery. The Program Manager shall determine whether or not material categorized as being "damaged" can be safely repaired to an undamaged condition. Material categorized as being in "good" condition does not require further attention beyond the periodic inspection schedule. The Program Manager shall perform or oversee the performance of all re-inspections. The Program Manager can designate a representative who is capable to perform such inspections. Documentation of re-inspections shall be archived in accordance with the provisions outlined in the Record Keeping section of this program. Results of the re-inspections should be made available to all custodial and maintenance staff within two weeks of the re-inspection. A



certification of receipt should be attached to the re-inspection report which requires the worker to return a letter stating they have received and reviewed the re-inspection material.

#### 4.2.10 Waste Management

The Program Manager shall ensure that all ACM wastes resulting from activities associated with this O&M Program at the Northgate Manor are handled and disposed of in accordance with applicable regulations and the requirements of this O&M Program. All asbestos-containing wastes shall be maintained in a wet state, and shall be properly containerized for transport and disposal in labeled double bags of 6-mil polyethylene. Asbestos waste shall be stored in a marked, secured location, until a sufficient volume is obtained to warrant delivery to an approved landfill. Asbestos waste may include (1) removed asbestos-containing materials; (2) contaminated polyethylene sheeting from underneath or around a work area; (3) disposable protective clothing; (4) water used for cleaning tools and respirators; (5) disposable respirator filters; and, (6) mops or rags used to clean the work area or any spills.

Specific waste management methods for O&M work practices are outlined in Appendix C. All waste generated by the maintenance and/or custodial workers while performing O&M activities shall be disposed of in an approved landfill. Bagged waste is allowed to be stored on site in a 55-gallon drum lined with a 6-mil asbestos waste bag for a maximum of 30 days. An asbestos waste hauler with appropriate licenses and certifications shall be contracted to transport the ACM waste off-site to an approved state or local landfill permitted to accept ACM wastes. The waste shall be tracked, utilizing signed waste manifests and disposal certificates that are submitted to the Program Manager and archived. The asbestos abatement contractor shall include pertinent information, such as the names, locations, and proof of permitting for the landfills intended for use, as part of the project submittal package.

#### 4.2.11 Emergency Response Actions

The Program Manager shall ensure that emergency response actions are carried out in as safe a manner as possible. Generally, emergency response activities involve situations where asbestos materials are disturbed or damaged through the disruption of a plumbing, electrical, mechanical and/or structural systems that affect the condition of ACM or situations where ACM is present on or near these systems and it has been damaged by the system (i.e. leaking pipe).

#### 4.2.12 O&M Program Updates and Modifications

The Program Manager shall review and update the O&M Program, as necessary, every six months after completion of the re-inspection. In addition, the Program Manager shall review and update the O&M Program after each O&M activity or other change in material quantity or condition. All updates shall be made within 30 days of the change in conditions, or within 30 days after receipt of the re-inspection report.

#### 4.2.13 Record Keeping

The Program Manager shall maintain all appropriate records as required by 29 CFR §1926.1101(n) and other applicable regulatory standards and the requirements of this O&M





Program. These records shall be maintained on site in a central location of the property. The following is an overview of required records and their content.

#### 4.2.13.1 Exposure Monitoring

If employees perform activities that require the use of air monitoring, then the Program Manager shall keep a record of all measurements taken to monitor employee exposure to asbestos. The employer shall maintain this record for at least 30 years, in accordance with 29 CFR §1910.20. This record shall include at least the following information:

- The date of measurement.
- The work practice involving exposure to asbestos.
- Sampling and analytical methods used.
- Sample numbers, sampling duration, and results of sample analysis.
- Personnel protective equipment utilized, if any.
- Name, social security number, and exposure of the employees.

#### 4.2.13.2 Medical Surveillance

The Program Manager shall establish and maintain an accurate record for each employee subject to medical surveillance by OSHA 29 CFR §1926.1101(m). The record shall include at least the following information.

- The name and social security number of the worker.
- A copy of the worker's medical examination results, including the medical history, questionnaire responses, results of any tests, and physician's recommendations.
- Physician's written opinions.
- Any employee medical complaints related to exposure to asbestos.

The employer shall ensure that this record is maintained for the duration of employment plus 30 years.

#### 4.2.13.3 Training Records and Availability of Records

The Program Manager shall maintain all worker-training records for at least one year beyond the last date of employment. The Program Manager, upon request, shall make all records available to regulatory agencies and building occupants, as required by 29 CFR §1910.20 and §1926.1101 for examination and copying. Also, the Program Manager, upon request, shall make any exposure records available for examination and copying to affected workers, former employees, and designated representatives.

#### 4.2.13.4 Transfer of Records

In the event of personnel change, the Program Manager shall take the steps necessary to ensure the transfer of all appropriate records.



#### 4.2.13.5 Miscellaneous Records

The Program Manager shall retain copies of all correspondence and all notices to building occupants, maintenance and custodial workers, and contractors. The Program Manager shall also maintain documentation for each material re-inspection performed. These records shall be archived for purposes of comparison with previous re-inspection results. Material Safety Data Sheets (MSDS) required as part of the O&M Program activities covered by the Hazcom standard are to be archived with this O&M document. These sheets shall be located such that they are available for immediate review and reference. Waste manifests, waste tracking forms, disposal certificates and other documents relating to waste management shall be archived. The Program Manager shall archive all permits obtained for O&M activities as required by federal, state and local regulations.

#### 4.3 Workers

Maintenance and custodial personnel who perform O&M activities shall perform their duties in a manner that is consistent with this O&M program and in a manner that promotes the safety of building personnel and occupants. Maintenance and custodial personnel shall be aware of the locations and conditions of the ACMs on the property and shall report changes in these conditions to the Program Manager. The custodial and maintenance personnel should act “as the eyes and ears” of the Program Manager.

#### 4.4 Competent Person

OSHA regulations at 29 CFR §1926.1101(b) and (o) require the designation of a Competent Person for all aspects of asbestos work. The Competent Person is an individual who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary or dangerous to O&M workers. The Competent Person has the authority to take prompt corrective action to eliminate hazardous conditions or situations. Generally, the Competent Person will be a consultant. However, the O&M Program Manager may be the Competent Person under this O&M Program, or may designate another member of the building staff to assume this role. The Competent Person shall meet the qualification and training requirements of the OSHA standard. The Competent Person shall ensure compliance with the applicable OSHA Regulations. Also, this individual shall perform frequent inspections of the asbestos work areas and equipment. For OSHA Class III and IV work performed by maintenance or custodial staff, on-site inspections shall be performed at periodic intervals sufficient to assess conditions and work practices, and at any time at requested by an employee or building occupant. The Competent Person will only perform the scope of his/her responsibilities when O&M response actions are performed by *in-house* maintenance or custodial staff.

#### 5.0 Selection and Use of Work Practices

When asbestos-containing materials are found in a building, there are typically five options available to the building owner. The degree to which each asbestos abatement option is





applicable varies by the use of the building/building area, the type of material, the building's future use, and other issues. They are:

*Removal (abatement)* - following all federal and state removal guidelines and recommendations.

*Enclosure* - construction of an air-tight barrier installed between the asbestos and the building environment. If enclosure is the recommended response action, the area of the enclosure should be marked on the site drawing maintained by the Program Manager to show maintenance workers the presence of asbestos-containing materials in area.

*Encapsulation* - the application of a sprayed-on liquid which surrounds or embeds the asbestos fibers in an adhesive matrix to prevent fiber release. Example: surfacing materials at the property which have been coated with a spray-applied paint or covering asbestos flooring with non-asbestos flooring.

*Repair* - returning damaged asbestos-containing materials (ACMs) to an undamaged condition under federal and state regulations.

*Operations & Maintenance (O&M) Program* - an O&M Program details a program of training, cleaning, work practices, and periodic surveillance to maintain ACM in good condition, ensure cleanup of asbestos fibers previously released, or present in the building environment, and prevent further release by minimizing and controlling ACM disturbance.

The following sections provide criteria for determining if and how to proceed with building O&M activities that may impact ACM. The criteria provided below will assist Program Manager in determining whether an O&M practice is appropriate for the building staff to complete, or if the O&M practice needs to be performed by a licensed ACM abatement contractor. A logical method for selecting the proper O&M practice(s) and the required personal protection equipment is provided for activities that can be carried out safely by building custodial and/or maintenance personnel. Example situations are also provided to assist the O&M Program participant in understanding the decision-making logic. Materials known to be ACM have been identified within the property as summarized in Section 1.1. Any work activity, regardless of type, that may impact an ACM is subject to the requirements of the decision-making process described below. Work activities that will occur in areas not previously characterized for ACMs are also subject to the decision-making processes described below. Only personnel meeting the qualifications described above for O&M personnel may make decisions utilizing this process.

## 5.1 Defining the Activity

The person initiating a request to perform maintenance or other building work activities that may impact an ACM is required to complete the Activity Summary Form included in Appendix E. The planned work activity needs to be adequately described on this form to allow the Program Manager to have an adequate understanding of the type and magnitude of the work activity and how it may impact ACM. As part of completing the Activity Summary Form, each work activity will be assessed to determine if and how the work activity may impact ACM. The ACM impact assessment and Activity Summary Form completion may be performed by the custodial and/or maintenance staff, but must be approved by the Program Manager.



Potential impacts to ACM during work activities may not be limited to actual handling or disturbance of the ACM, but shall include activities that may impact the accessibility or condition of the ACM. For example, although the ACM itself may not be disturbed by a work activity, the work activity may result in increased ACM accessibility (e.g. by removing a door) or ACM release (e.g. through increased air movement). While these work activities may not have an immediate affect on the nearby ACM, the work activities could affect the ACM condition or the potential for exposure to the ACM, resulting in a need to modify the O&M Program and inspection frequency.

If the Program Manager's assessment determines that no ACM will be impacted, the Activity Summary Form would be approved and the work activity can proceed without the Program Manager specifying ACM O&M practices.

## 5.2 Allowed ACM O&M Practices

The purpose of this O&M Program is to address the activities which may impact known asbestos-containing materials located within the Northgate Manor. The following is a summary of ACM concerns at the subject property:

- (1) Vinyl flooring and stair tread materials and associated mastics
- (2) Ceramic floor tile grout

Activities which may impact or disturb the identified asbestos-containing materials are not permitted to be performed by any maintenance personnel or tenants of the facility. All asbestos related activities should be performed only by trained and authorized personnel using a work permit system. The work permit program requires the person requesting the work to submit a Job Request Form prior to any maintenance activity. The Job Request Form gives the time and location of the requested work, the type of maintenance needed, and available information about any ACM in the vicinity of the requested work. Upon receiving a pre-work Job Request Form the building owner/management should follow these procedures:

- (1) Refer to the ACM inspection report to determine if any ACM is present in the area where the work will occur. If ACM is present, but is not expected to be disturbed, the facility owner/management should note the presence of the ACM on the permit form and provide additional instruction on the importance of not disturbing the ACM.
- (2) If ACM is both present and likely to be disturbed, the Program Manager should visit the area where the work is to be performed and determine what work practices should be instituted to minimize the release of asbestos fibers during the maintenance activities.
- (3) The determination should be recorded on a Maintenance Work Authorization Form, which is then forwarded to the in-house maintenance supervisor or to the maintenance contractor to authorize the work.
- (4) The Program Manager should ensure a copy of both the request and authorization forms are placed in a permanent file.



- (5) Where the task is not covered by previously approved standard work practices, workers should contact the appropriate site maintenance supervisor or administrator, for the approval of work methods prior to the commencement of the work. The building owner/management should ensure the appropriate work practices and protective measures are used for the job.
- (6) For all jobs where contact with ACM is likely, the Program Manager should visit the work site prior to the commencement of the work to ensure the job is being performed properly. For lengthy jobs where disturbance of ACM or is intended or likely, periodic inspections should be made for the duration of the project.
- (7) The Program Manager's observations should be documented on an Evaluation of Work Form. Any deviation from standard and approved work practices should be recorded immediately on the Evaluation of Work Form and the practices should be immediately corrected.
- (8) Upon completion of the work, a copy of the Evaluation of Work Form should be placed in the permanent asbestos file.

Copies of sample Job Request Forms, Evaluation of Work Forms, and Maintenance Work Authorization Forms are presented in Appendix E.

It is not possible to identify specifically all employee work activities or situations where asbestos might be impacted or disturbed. Common types of activities or situations are however, listed below, detailing safety procedures. Activities which may impact the identified asbestos-containing materials are not permitted to be done by untrained maintenance personnel or tenants of the building. Activities which are allowable (to OSHA asbestos awareness trained maintenance personnel) are the following:

## 1. GUIDANCE FOR THE CLEANING OF ASBESTOS DUSTS AND DEBRIS:

In areas where the known asbestos-containing materials are noted to be damaged or deteriorating then asbestos dust and debris clean-up is warranted. In addition, areas containing damaged asbestos should be cleaned on a regular basis to minimize the collection of asbestos dusts. Cleaning of asbestos dusts is conducted through typical wet mopping methods and proper disposal of the wastes. If elevated levels of settled asbestos dusts are suspected, cleaning practices can be supported with the use of a HEPA vacuum. The following are asbestos dust cleaning protocols:

- (1) Prepare cleaning solution per amended water instructions (See Appendix C).
- (2) If settled dusts are present to the naked eye, initially vacuum the affected area with a HEPA style vacuum. DO NOT use a conventional vacuum.
- (3) Apply a coat of cleaning solution and allow to activate for 10-15 minutes.



- (4) Mop affected area with a clean mop. Replace mop head each 500 square feet of surface area to insure that contaminated mop heads are not used. DO NOT vacuum excessively wet areas with a HEPA style vacuum.
- (5) Dispose of all mop heads in accordance with state and federal regulations.
- (6) Perform asbestos in dust clearance testing if necessary (See Section 5.5.2.1).

In areas where the known or presumed asbestos-containing material is damaged, the maintenance staff may need to repair the building components as a maintenance activity (not an asbestos removal activity). Repair activities should employ the following steps:

- (1) Conduct work during off-hours and isolate the area to prevent unauthorized personnel access.
- (2) Turn off air handling units such as air conditioning and/or heating unit.
- (3) Prepare work area by sealing the area (i.e. heating vents, windows and doors) by covering with polyethylene sheeting.
- (4) Maintenance staff shall don approved respirators and protective personnel equipment/clothing.
- (5) Repair damaged surface area using an approved asbestos abatement methodology and seal with an encapsulant.
- (6) Clean-up enclosed area and clean-up potential asbestos dusts per dust cleaning methodologies.
- (7) Dispose of all used cleaning supplies, containment barriers, and asbestos debris/dust in accordance with state and federal regulations.

## 2. GUIDANCE FOR VINYL FLOORING AND STAIR TREAD MATERIALS:

The vinyl flooring and stair tread materials and associated mastics located at the subject property are presumed to contain asbestos. Prohibitions and limitations apply to the care of these materials:

- No sanding of these materials;
- Floor stripping must use low abrasion pads at speeds below 300 rpm and wet methods;
- Dry buffing may be performed at any speed as long as the flooring has sufficient finish to prevent the pad from contacting the flooring material.

For removing non-friable vinyl resilient flooring or stair tread materials which contain ACM and where the employer has not proven the absence of ACM, the employer shall ensure that



employees comply with the following work practices and that employees are trained in these practices:

- (1) Non-friable flooring, stair tread, its backing, or mastic shall not be sanded;
- (2) Vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) shall be used to clean floors;
- (3) All scraping of residual adhesive and/or backing shall be performed using wet methods;
- (4) Dry sweeping is prohibited;
- (5) Mechanical chipping is prohibited unless performed in a negative pressure enclosure which meets the requirements of section 29 CFR 1926.1101(g)(5) of the Construction standard;
- (6) Tiles shall be removed intact, unless the employer demonstrates that intact removal is not possible;

Removal of asbestos-containing flooring and stair tread materials is not allowed to be conducted by untrained and unlicensed staff.

### 3. GUIDANCE FOR CERAMIC FLOOR TILE GROUT:

The ceramic floor tile grout located at the subject property is presumed to contain asbestos. Prohibitions and limitations apply to the care of this category of material:

- \* No sanding of these materials;
- \* Floor stripping must use low abrasion pads at speeds below 300 rpm and wet methods;
- \* Dry buffing may be performed at any speed as long as the materials have sufficient finish to prevent the pad from contacting the grout material.

For removing non-friable ceramic floor tile grout which contains ACM or where the employer has not proven the absence of ACM, the employer shall ensure that employees comply with the following work practices and that employees are trained in these practices:

- (1) Non-friable ceramic tile grout shall not be sanded;
- (2) Vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) shall be used to clean these materials;
- (3) All scraping of residual adhesive and/or backing shall be performed using wet methods;
- (4) Dry sweeping is prohibited;



- (5) Mechanical chipping is prohibited unless performed in a negative pressure enclosure which meets the requirements of section 29 CFR 1926.1101(g)(5) of the Construction standard;
- (6) Tiles shall be removed intact, unless the employer demonstrates that intact removal is not possible;

Removal of asbestos-containing ceramic floor tile grout is not allowed to be conducted by untrained and unlicensed staff.

#### 4. ROUTINE HOUSEKEEPING DUTIES:

If employees of the Northgate Manor perform routine custodial duties that involve working near or cleaning ACM that is not enclosed, sealed or otherwise protected from release of asbestos fibers into the air certain housekeeping procedures must be strictly adhered to. This activity is covered by the General Industry standard as long as no construction activity is involved.

- (1) The building owner/management must provide the affected workers with asbestos awareness training each year. The course must be provided at no cost to the employee. The course must also cover the health effects of asbestos exposure, the hazards of smoking and asbestos, use of respirators, locations of asbestos materials and signs of their damage, and who to tell and what to do if such materials are dislodged or become non-intact. This training must be provided regardless of the expected exposure levels to housekeepers.
- (2) In addition, if the building owner/management should reasonably expect that any of the housekeeping employees may be exposed in excess of a permissible exposure limit (PEL: 0.1 fibers per cubic centimeter as a time-weighted average over an 8 hour period or 1.0 fibers per cubic centimeter over a 30 minute period), then the following procedures must be adhered to:
  - (a) Monitor according to the OSHA standard's requirements to accurately determine the airborne concentrations.
  - (b) Provide employees with medical surveillance. A medical surveillance program requires the worker to complete a health questionnaire and may include a physical examination at no cost to the employee. The building owner/management must keep exposure and medical surveillance records for the duration of employment plus 30 years.
  - (c) Restrict access to areas of expected over-exposure
  - (d) Provide more extensive training: An annual asbestos awareness course is required. The course must be provided at no cost to the employee. The course must cover the health effects of asbestos exposure, the hazards of smoking and asbestos, use of respirators, locations of asbestos materials and signs of their damage, how to respond to asbestos exposure, and required housekeeping work practices.



- (e) Provide appropriate respirators and protective clothing at no cost to employees to use while working in areas of potential over-exposure. Respirators must be equipped with HEPA filters.

Housekeeping activities conducted in the immediate area of friable or significantly damaged or loosely bonded ACM may indicate significant airborne exposure potential. Activities which release fibers from ACM such as grinding, cutting, or sanding, also have such potential. Please note that reference here is only to workers who are exposed to accessible asbestos when doing routine housekeeping activities. It does not include maintenance activities, repair, removal, or construction work that may involve disturbance or removal of asbestos-containing materials. Neither does it include clean-up and disposal of dust or debris resulting from construction, renovation, removal, repair, or maintenance activities. Performance of these tasks by the housekeeping employees may trigger additional obligations that are described elsewhere in this Operations and Maintenance Program.

#### 5.2.1 Non-Emergency ACM Work Practices

Allowed non-emergency ACM O&M work practices under this program are limited to qualified Class III and IV asbestos work practices. All Class I and II asbestos work practices, and those Class III and IV asbestos work practices not meeting the qualification criteria below, shall be carried out by a qualified and properly licensed asbestos abatement contractor overseen by an independent industrial hygiene consultant (see Section 5.5.2). Non-emergency Class III and IV asbestos work practices allowed at the Northgate Manor must meet the following qualification criteria:

- ACM can be sufficiently wetted and/or contained to prevent migration of fibers to other locations without the aid of negative pressure enclosures or devices;
- ACM O&M work practices are unlikely to result in worker exposure to airborne asbestos concentrations greater than or equal to the PEL (0.1 f/cc), based on previous exposure assessments and monitoring. (Note: previously unmonitored activities may require monitoring as described in Section 4.2.1);
- ACM O&M work practices are unlikely to result in building occupant exposure to airborne asbestos concentrations greater than or equal to the one tenth of the PEL (0.01 f/cc), based on previous exposure assessments and monitoring;
- ACM is not located in an area defined as a confined space;
- No greater than three linear feet or three square feet of ACM will be affected. This criterion may not be circumvented by performing a number of smaller tasks that add up to a total greater than three square or linear feet.

It is assumed that Class I and II ACM work practices cannot meet the above criteria. Also, many Class III ACM work practices and some Class IV ACM work practices may not meet these criteria.

#### 5.2.2 Emergency ACM Work Practices

Emergency ACM work practices may be required for two basic types of emergencies:

- (1) where the immediate threat is due to ACM





- (2) where the immediate threat is not due to ACM but the material may become a threat when the emergency is addressed.

An example of the first type of emergency ACM work practice would be where the ACM is disturbed, or the ACM deteriorates rapidly, resulting in an immediate threat to safety and health due to the ACM. An example of the second type of emergency ACM work practice would be where another condition or problem not directly related to the ACM results in an emergency that requires ACM to be impacted in order to correct the condition or problem. Emergency ACM work practices shall only include those ACM work practices necessary to safely control the situation(s) that poses an immediate threat to the life or health of building personnel or tenants. In emergency situations, the threat shall only be controlled to the extent necessary to prevent a continued threat. A complete abatement of the ACM shall not be performed unless it is necessary to contain the threat. Permanent solutions shall be handled through non-emergency work practices once the immediate threat is controlled.

In general, it shall be determined for immediate threats not due to ACM that the emergency constitutes a greater threat than the potential ACM exposure poses before emergency ACM work practices are carried out. Examples of other situations where emergency ACM work practices may be required include impending fires, explosive atmospheres, and other life threatening situations. Leaking water pipes and other mechanical failures that do not immediately affect employee or tenant safety are not considered emergency situations and must be handled using the non-emergency ACM work practices.

In emergency situations, the Program Manager and custodial and/or maintenance workers shall use their best judgment as to whether the situation constitutes an emergency and whether the emergency can be handled without impacting the ACM. If it is determined that the situation cannot be handled without impacting the ACM, the most stringent level of worker protection and the highest possible level of ACM work practices controls shall be applied. All non-emergency requirements regarding documentation and permitting requirements shall be accomplished immediately after the emergency response is complete.

All other requirements of this O&M Program apply to emergency O&M work practices, including regulatory compliance, notification, handling and disposal of ACM wastes, etc. An Emergency Notification Form is provided in Appendix G. The Program Manager should make every effort to become familiar with how to address emergency situations before they occur. In emergency situations, maintenance or custodial workers shall restrict access to affected areas of the building using whatever means necessary before the asbestos abatement contractor arrives on-site. Trained maintenance or custodial workers may shut off mechanical, plumbing or electrical systems without donning PPE if it is determined that there is no potential for exposure to asbestos fibers while doing so.

### 5.3 Permitting System

Before any ACM work practices are selected or performed, a permitting system must be initiated to track and document all maintenance and other work activities at the site and to assess the potential for these activities to impact ACMs. All planned work activities must be described on an Activity Summary Form (included in Appendix E) that must be approved by the Program Manager. The Activity Summary Form will be reviewed by the Program Manager to determine if





the work activity will impact ACMs and can be performed in accordance with the O&M Program.

If the work requires ACMs to be impacted by building personnel, the Program Manager will determine if the activity meets the qualification criteria established above for allowed O&M practices. The Program Manager will then complete the ACM work practices Authorization Form (Appendix E) describing the allowed ACM work practices, including necessary worker protection requirements, control methods to be used, and exposure monitoring requirements. The Authorization Form will be completed regardless of whether the O&M activities will be performed by building personnel or outside contractors. The Program Manager shall complete and issue a notification form(s) to all applicable persons whenever an Authorization Form is completed. The custodial and/or maintenance personnel performing the ACM work practice will complete the ACM work practices Completion Form (Appendix E), detailing any deviations from the ACM work practices and/or any other problems encountered while performing the ACM work practices. The Completion Form will be provided to the Program Manager for review and approval.

#### 5.4 Selection of ACM Work Practices

Appropriate ACM work practices will be selected by the maintenance staff (or the Program Manager) and approved by the Program Manager. Work practice descriptions are provided in Appendix C. The Program Manager shall complete a Program Manager Checklist (Appendix F) and evaluate the work to be performed based on the information in the completed Activity Summary Form, available survey and assessment data, and data on past O&M activities (if available). When reviewing data and completing the Program Manager checklist, the following shall be determined.

- \* If an ACM may be encountered during the work;
- \* If any ACMs which have been enclosed may be encountered during this work;
- \* Appropriate work practice(s) to address the situation;
- \* Appropriate level of work practice(s) to be used;
- \* Required PPE, if any, for the work.

The Program Manager must determine the appropriate work practice considering: the level of worker and environmental protection necessary, based on the O&M Program objectives; regulatory compliance of the activity, including requirements for worker protection, work practices, exposure monitoring, notifications, and state or local requirements; and whether exposure monitoring data and Authorization Forms from past work indicate that a given work practice or work practice level accomplishes the O&M objectives. In selecting the appropriate work practice for a given situation, the Program Manager shall also consider the following.

- \* Airborne fiber release potential of material or O&M activity;
- \* Condition and friability of the ACM;
- \* Exposure and air monitoring data;
- \* Training, skill, and experience of workers;
- \* Quantity of ACM to be disturbed;
- \* Location, type, and percentage of ACM;
- \* Exposure potential for occupants and other personnel;
- \* State and local regulatory requirements;



- \* Ventilation system configurations;
- \* On-site supervision.

## 5.5 Clearance for O&M ACM Work

An asbestos O&M activity or a clean-up of a minor release is successful when the source of the fiber release has been controlled and airborne asbestos is kept to a minimum. All workers must be trained and follow the accepted work practices. Success of the activity is confirmed with a final evaluation at each work area. The evaluation consists of visual inspection, air testing, wipe sampling, and micro-vacuum, if warranted. Visual inspection is used to determine if the work has been performed properly and to check for debris and other signs of poor cleaning. Air and surface dust testing helps confirm that the work site has been adequately cleaned. The Asbestos Program Manager shall decide whether visual, air, or surface dust testing clearance is acceptable on a job-to-job basis. It is required that a combination of two of the three methods (air sampling and wipe sampling or air sampling and micro-vacuums) be utilized to determine the extent of an asbestos fiber release from friable or non-friable asbestos materials. Air testing with analysis via Phase Contrast Microscopy (PCM), NIOSH 7400 Method, is an acceptable method of air clearance for activities involved in this O&M Program for the Northgate Manor.

### 5.5.1 Visual Inspection

The primary test for completion of the work site is a thorough visual inspection. The inspection should be conducted prior to the occupation of the area and after the area has been cleaned via HEPA vacuum, wet wiping, or other accepted method. The inspector should first ensure job completeness. If ACM has been cleaned or debris removed, the inspector should ensure no debris remains. Special attention should be given to corners and hard-to-reach areas. Next, the inspector should determine that the work site has been adequately cleaned. Any activity that disturbs ACM will release fibers. Therefore, work site clean-up after removal, repair, or cleaning is critical. Examine all surfaces for dust and debris. Use a damp cloth to collect dust from all surfaces and inspect the cloth for evidence of dust. This is a practical way to establish that the "no dust" requirement has been met. If dust is found, the entire work area should be re-cleaned and the tests repeated.

### 5.5.2 Air Testing

Air monitoring should be conducted after all minor and major release episodes by a trained and licensed asbestos air sampler. The air monitoring should be conducted only after the work area has passed a visual inspection. Sampling for asbestos consists of collecting fibers by drawing air through a filter at a known rate. But this approach may fail to detect the presence of asbestos fibers. For example, if sampling is conducted for a short time during a quiet period (i.e. when air movement is limited), many fibers will settle out of the air onto the floor and other surfaces and may not be captured on the filter. Under these conditions, air measurements could show little or no asbestos. Usually, aggressive sampling is recommended as a post work air test provided the aggressive sampling will not contaminate adjacent areas. Aggressive sampling uses forced air equipment such as a leaf blower to dislodge free fibers. Routine air samples are generally analyzed using Phase Contrast Microscopy (PCM) according to the NIOSH 7400 Method. This method is recognized by the U.S. Occupational Health and Safety Administration (OSHA), the



U.S. Environmental Protection Agency (EPA), and the State of South Carolina for its ability to characterize airborne fiber levels.

Following all O&M activities performed under this Program, the final airborne fiber concentration(s) in an affected area shall be less than 0.010 f/cc when analyzed by phase contrast microscopy (PCM). In the State of South Carolina, air monitoring should be completed by a properly trained and licensed asbestos air sampler. In addition, the samples must be submitted to an accredited and/or state licensed Asbestos Analytical Laboratory.

#### 5.5.2.1 Phase Contrast Microscopy (PCM)

Phase Contrast Microscopy (PCM) is the method of asbestos air testing that is most familiar, available, and frequently used. It is also the least expensive and has a well established analytical protocol. However, the protocol for PCM does not distinguish between asbestos and other types of fibers (i.e. fiberglass) and counts only fibers longer than five micrometers; nor is PCM sensitive enough to detect the extremely thin fibers typical of airborne asbestos in buildings. Thus, the interpretation of PCM results assumes that a low concentration of relatively large airborne fibers means that the concentration of asbestos fibers is also low. If a potential source of non-asbestos fibers (i.e. fiberglass insulation, carpet, etc.) is present within the work area, TEM analysis shall be used instead of PCM analysis. The procedures for testing via the PCM Method are as follows:

##### Sampling:

- \* Draw at least 1,200 liters of air through each filter at a rate of 1 to 12 liters per minute.
- \* Collect at least five samples per homogenous work site, or one per room.

##### Analysis:

- \* Measure the asbestos on each filter with PCM using the NIOSH 7400 procedures.
- \* Include at least one field blank and one laboratory blank per abatement project, for quality control purposes. Also, split one work site sample for duplicate analysis.

##### Release Criterion:

- \* Release the contractor if every sample value is below the limit of reliable quantification (0.01 f/cc).
- \* If any of the sample values is above the prescribed level, clean the entire work area again, collect new samples, and evaluate the samples as describes above.

## 6.0 Contracted ACM Work

If ACM abatement or O&M work is to be performed by contractors, the Program Manager's responsibilities and activities include submittal reviews and verification that O&M work and monitoring is being performed as required. The permitting system described above will be applied to work performed by outside contractors. The Program Manager will track abatement and O&M activities using the ACM work practices Authorization Form and the ACM work practices Completion Form. As necessary, modifications to other forms shall be made to assist the Program Manager in tracking ACM activities that affect the overall O&M program. These



permit and tracking forms shall provide the basis for updating and modifying the O&M Program to reflect current material quantities and condition.

## 7.0 Appendices

Appendix A	Asbestos Inspection Report
Appendix B	Glossary of Terms
Appendix C	O&M Work Practices
Appendix D	Program Manager Decision-Making Flowchart
Appendix E	Permit Forms
Appendix F	Program Manager Checklist and O&M Annual Review Form
Appendix G	Notification Forms
Appendix H	"Ready to Use" O&M Activity Sheets







# ASBESTOS INSPECTION REPORT

## Northgate Manor

220 Biblebrook Drive  
Greer, SC 29651

*Prepared for:*

## Dominion Due Diligence Group

201 Wylderose Drive  
Midlothian, VA 23113

Inspection Date: **October 7-8, 2024**

Report Date: **October 16, 2024**

*Inspected by:*

A handwritten signature in black ink, appearing to read "T Quint", is written over a horizontal line.

**Timothy Quint**

SC Asbestos Building Inspector, #BI-002268  
(Expires on 2/5/2025)

OSE Project Number: 24-1315

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## **EXECUTIVE SUMMARY**

One Source Environmental, LLC has contracted with Dominion Due Diligence Group (Client) to conduct a pre-renovation asbestos inspection of Northgate Manor, located at 220 Biblebrook Drive, in Greer, SC. The objective of the survey was to provide documentation to the Client consisting of a listing of asbestos-containing materials that may be impacted during upcoming renovation activities.

Inspection activities were performed on October 7-8, 2024, by Mr. Timothy Quint, South Carolina-certified Asbestos Building Inspector. Copies of current certifications can be found in Appendix C.

Inspection, sampling, material condition assessments, and analytical procedures for asbestos-containing building materials were performed in general accordance with the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) - EPA Title 40, Code of Federal Regulations (CFR), Part 61 Subpart M (40 CFR Part 61, Subpart M), the EPA AHERA regulation (40 CFR Part 763) and ASTM E2356-18. A total of two hundred and fifty-eight (258) bulk samples were collected and two hundred and sixty-seven (267) layers were analyzed via PLM analysis and forty-five (45) layers were analyzed via TEM analysis to complete the inspection.

### **Asbestos was identified within the following materials:**

<b>Northgate Manor – 220 Biblebrook Drive, Greer, SC</b>					
<b>Material</b>	<b>Location</b>	<b>Percentage/ Type</b>	<b>Material Condition</b>	<b>Approx. Quantity</b>	<b>NESHAP Category</b>
None of the materials sampled contain asbestos.					

### **Asbestos was assumed to be present within the following materials:**

<b>Northgate Manor – Building A</b>					
<b>Material</b>	<b>Location</b>	<b>Percentage/ Type</b>	<b>Material Condition</b>	<b>Approx. Quantity</b>	<b>NESHAP Category</b>
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	950 SF per 3 Bed/2 Bath Units, 800 SF per 2 Bed/1 Bath Units	Cat I – NF ACM
Gray Vinyl Stair Tread	Each Unit Stairwell	Assumed	Good	36 SF per Unit	Cat I – NF ACM
Gray Vinyl Sheet Flooring and assoc. Mastic	Bathrooms, Units 3, 5, 6, 9, and 10	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Bathrooms, Units 1, 2, 4, 7, and 8	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units	Cat II – NF ACM



Northgate Manor – Building B					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	950 SF per 3 Bed/2 Bath Units, 800 SF per 2 Bed/1 Bath Units	Cat I – NF ACM
Gray Vinyl Stair Tread	Unit Stairwells, except for Units 12, 14, 15, and 17	Assumed	Good	36 SF per Unit	Cat I – NF ACM
Gray Vinyl Sheet Flooring and assoc. Mastic	Bathrooms, Units 12, 14, 15, and 17	Assumed	Good	40 SF per Unit	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Bathrooms, Units 13, 16, and 18	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units	Cat II – NF ACM
Blue/White Vinyl Sheet Flooring and assoc. Mastic	Unit 11 Bathroom	Assumed	Good	60 SF	Cat I – NF ACM

Northgate Manor – Building C					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	950 SF per 3 Bed/2 Bath Units, 800 SF per 2 Bed/1 Bath Units, 650 SF per 1 Bed/1 Bath Units	Cat I – NF ACM
Gray Vinyl Stair Tread	Unit Stairwells, except Units 19 and 26	Assumed	Good	36 SF per Unit	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	All Unit Bathrooms	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units, 45 SF per 1 Bed/1 Bath Units	Cat II – NF ACM

Northgate Manor – Building D					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	950 SF per 3 Bed/2 Bath Units, 800 SF per 2 Bed/1 Bath Units, 650 SF per 1 Bed/1 Bath Units	Cat I – NF ACM

Northgate Manor – Building D					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Gray Vinyl Stair Tread	Unit Stairwells, except Units 27 and 34	Assumed	Good	36 SF per Unit	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms, except Unit 31	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units, 45 SF per 1 Bed/1 Bath Units	Cat II – NF ACM
Gray Vinyl Sheet Flooring and assoc. Mastic	Unit 31 Bathroom	Assumed	Good	40 SF	Cat I – NF ACM

Northgate Manor – Building E					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	650 SF per Unit	Cat I – NF ACM
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Unit 36 Utility Closet	Assumed	Good	12 SF	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms	Assumed	Good	45 SF per Unit	Cat II – NF ACM
Gray 12"x12" Vinyl Floor Tile and assoc. Mastic	Office Kitchen	Assumed	Good	650 SF	Cat I – NF ACM
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Office Storage Room and Hallway	Assumed	Good	650 SF	Cat I – NF ACM
Beige Grout assoc. w/ Beige 1"x1" Ceramic Floor Tile	Office Bathrooms	Assumed	Good	80 SF	Cat II – NF ACM

Northgate Manor – Building F					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms	Assumed	Good	950 SF per 3 Bed/2 Bath Units, 800 SF per 2 Bed/1 Bath Units, 650 SF per 1 Bed/1 Bath Units	Cat I – NF ACM

Northgate Manor – Building F					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Gray Vinyl Stair Tread	Unit Stairwells, except Units 39 and 46	Assumed	Good	36 SF per Unit	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms	Assumed	Good	60 SF per 3 Bed/2 Bath Units, 40 SF per 2 Bed/1 Bath Units, 45 SF per 1 Bed/1 Bath Units	Cat II – NF ACM

Northgate Manor – Maintenance					
Material	Location	Percentage/ Type	Material Condition	Approx. Quantity	NESHAP Category
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Bathroom, Hallway, and Left Central Office	Assumed	Good	430 SF	Cat I – NF ACM
Gray 12"x12" Vinyl Floor Tile and assoc. Mastic	Hallway	Assumed	Good	20 SF	Cat I – NF ACM
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Front Left Office	Assumed	Good	130 SF	Cat II – NF ACM

Asbestos containing material (ACM) as defined by the EPA and OSHA are materials with an asbestos concentration of greater than 1% (>1%) as analyzed by polarized light microscopy (PLM). In addition, ACM is designated as follows for NESHAP compliance:

**Friable asbestos** - material which can be crumbled, pulverized, or reduced to powder by hand pressure, a.k.a. Regulated Asbestos Containing Materials (RACM)

**Category I non-friable** - includes resilient floor coverings, asphalt roofing products, gaskets, and packings.

**Category II non-friable** - any non-friable ACM that is not in Category I (i.e. transite siding material).

## **INTRODUCTION**

A pre-renovation asbestos survey was completed for Dominion Due Diligence Group (Client) on October 7-8, 2024, of Northgate Manor, located at 220 Biblebrook Drive, in Greer, SC by One Source Environmental. The inspection included interior and exterior building materials but specifically excluded all flooring materials.

Inspection activities were performed by Mr. Timothy Quint, South Carolina-certified Asbestos Building Inspector. Copies of current certifications can be found in Appendix C.

## **PROJECT DESCRIPTION**

The site contains six (6) apartment buildings with forty-six (46) dwelling units and one (1) maintenance garage reportedly constructed in 1969. Suspect asbestos-containing materials throughout the site were generally in good condition. Exterior building finishes consist of brick and vinyl siding, exterior window and door caulk, metal doors, vinyl windows, and asphalt shingle roofing. The interior building finishes consist of drywall walls and ceilings, ceiling texture, ceramic tile floors and walls, various interior caulking, vinyl flooring and wood doors.

## **SAMPLED SUSPECT ASBESTOS CONTAINING MATERIALS - NEGATIVE**

Samples of the following suspect materials were collected and found to be Negative for asbestos:

<b>Northgate Manor – Building A</b>	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
Gray HVAC Duct Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

<b>Northgate Manor – Building B</b>	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
White HVAC Duct Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

<b>Northgate Manor – Building C</b>	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
White HVAC Duct Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

Northgate Manor – Building D	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
White HVAC Duct Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

Northgate Manor – Building E	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
White HVAC Duct Mastic	Gray Vinyl Cove Base and assoc. Mastic
Brown Vinyl Cove Base and assoc. Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

Northgate Manor – Building F	
Drywall and Joint Compound	White Ceiling Texture
White Interior Caulk	White Grout assoc. w/ 4"x4" White Wall Tile
White HVAC Duct Mastic	Black Exterior Window Caulk
White Exterior Door Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

Northgate Manor – Maintenance	
Drywall and Joint Compound	Beige Vinyl Cove Base and assoc. Mastic
White Interior Caulk	White Exterior Door Caulk
White Exterior Window Caulk	Black Asphalt Roof Shingle
Black Roof Felt	

## **SAMPLING AND ANALYTICAL PROCEDURES**

### **Sampling Procedures**

Representative bulk samples of suspect ACMs were randomly collected from the interior of the inspected space. Homogenous material determinations were assessed based on the following criteria:

- Similar physical characteristics (same color and texture, etc.);
- Application (sprayed-on, troweled-on, assembly into a system, etc.); and
- Material function (thermal insulation, floor tile, wall, or ceiling system, etc.).

Once collected, all bulk samples were appropriately labeled and shipped to an accredited analytical laboratory for analysis. All sampled building materials were also characterized for condition and approximate quantity on-site during the inspection(s).

### **PLM and TEM Analysis Methodology**

Laboratory services were provided by AmeriSci Richmond, located in Midlothian, Virginia, a National Voluntary Laboratory Accreditation Program (NVLAP) certified laboratory (NVLAP #101904-0) for PLM analysis.

Each bulk sample was analyzed by polarized light microscopy (PLM) in accordance with the United State Environmental Protection Agency's (EPA's) Test Methods: Methods for the determination of Asbestos in Bulk Building Materials (EPA 600/M4-82-020, July 1993) and the McCrone Research Institute's The Asbestos Particle Atlas. Additional treatment(s) and test(s) were performed as required to accurately define material composition (i.e. ashing, extraction, acetone treatment, point counting, and/or transmission electron microscopy [TEM]).

Analysis consisted of using the bulk sample for visual observation and slide preparation(s) for microscopic examination and identification. All samples were analyzed for asbestos (chrysotile, amosite, crocidolite, anthophyllite, and actinolite/tremolite), fibrous non-asbestos constituents (mineral wool, cellulose, etc.), and non-fibrous constituents. Using a stereoscope, the microscopist visually estimated relative amounts of each constituent by determining the volume of each constituent in proportion to the total volume of the sample.

Due to the limitations of PLM analysis, non-friable organically bound (NOB) materials (i.e. floor tiles, cove base, mastics, roofing materials, caulks, etc.) found to contain no asbestos via PLM analysis, the ASTM Standard Practice for Comprehensive Asbestos Building Surveys Designation: E 2356-18 (ASTM E 2356-18) recommends that these materials and any related results be considered as inconclusive unless Transmission Electron Microscopy (TEM) analysis is performed. South Carolina requires this testing be performed.

## **FINDINGS**

### **Interpretation of Asbestos Results**

Federal OSHA and the U.S. EPA define an ACM as any material containing >1% asbestos. The lower limit of reliable detection for friable asbestos using the PLM analytical method is 1.0% by volume. If "<1%" appears in this report, it should be interpreted as meaning that asbestos was present in the sample, but the exact percentage is unknown.

Furthermore, per EPA NESHAP regulations, friable material with a PLM-derived asbestos concentration of <10% must be assumed to be ACM until it is point counted to more precisely determine the actual asbestos content. If this material is found to contain less than 1% asbestos by

point counting, then it may be disposed of as non-hazardous waste. Any sample can be subjected to the more stringent Point Count Method of analysis to more precisely determine the actual asbestos content.

Although a material may contain asbestos at <1%, it **DOES NOT** relieve contractors from performing exposure assessments (personal air monitoring) on their employees per the OSHA Asbestos Standard (29 CFR 1926.1101) and should not be interpreted as asbestos is not present. Although laboratory analysis may indicate "<1%", airborne asbestos concentrations still may exceed the OSHA Permissible Exposure Limit (PEL) depending on the work activity.

**The following materials contain or were assumed to contain Asbestos in concentrations exceeding 1%:**

Northgate Manor - Building A	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Gray Vinyl Stair Tread	Each Unit Stairwell
Gray Vinyl Sheet Flooring and assoc. Mastic	Bathrooms, Units 3, 5, 6, 9, and 10
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Bathrooms, Units 1, 2, 4, 7, and 8

Northgate Manor – Building B	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Gray Vinyl Stair Tread	Unit Stairwells, except for Units 12, 14, 15, and 17
Gray Vinyl Sheet Flooring and assoc. Mastic	Bathrooms, Units 12, 14, 15, and 17
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Bathrooms, Units 13, 16, and 18
Blue/White Vinyl Sheet Flooring and assoc. Mastic	Unit 11 Bathroom

Northgate Manor – Building C	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Gray Vinyl Stair Tread	Unit Stairwells, except Units 19 and 26
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	All Unit Bathrooms

Northgate Manor – Building D	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Gray Vinyl Stair Tread	Unit Stairwells, except Units 27 and 34
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms, except Unit 31
Gray Vinyl Sheet Flooring and assoc. Mastic	Unit 31 Bathroom

Northgate Manor – Building E	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Unit 36 Utility Closet
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms
Gray 12"x12" Vinyl Floor Tile and assoc. Mastic	Office Kitchen
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Office Storage Room and Hallway
Beige Grout assoc. w/ Beige 1"x1" Ceramic Floor Tile	Office Bathrooms

Northgate Manor – Building F	
Material	Location
Brown/Gray Vinyl Plank and assoc. Mastic	Throughout Units except the bathrooms
Gray Vinyl Stair Tread	Unit Stairwells, except Units 39 and 46
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Unit Bathrooms

Northgate Manor – Maintenance	
Material	Location
Beige 12"x12" Vinyl Floor Tile and assoc. Mastic	Bathroom, Hallway, and Left Central Office
Gray 12"x12" Vinyl Floor Tile and assoc. Mastic	Hallway
Beige Grout assoc. w/ Beige 12"x12" Ceramic Floor Tile	Front Left Office

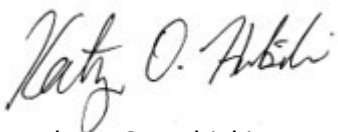
## **CONCLUSIONS AND RECOMMENDATIONS**

Results of the analysis confirmed asbestos was not identified within any of the bulk samples collected. Any materials uncovered during renovation or demolition activities that are not addressed in this inspection report must be sampled by an accredited asbestos inspector prior to any disturbance, or they must be treated as asbestos containing (ACM).



We appreciate the opportunity to assist you with your environmental compliance needs. If you have any questions or comments, please feel free to contact us.

Yours truly,  
**One Source Environmental, LLC**

A handwritten signature in black ink, reading "Kathy O. Hubicki". The signature is written in a cursive, flowing style.

Kathryn O. Hubicki  
President  
South Carolina-certified Asbestos Building Inspector

## **DISCLAIMER**

The content presented in this report is based on data collected during the site inspection and survey, review of pertinent regulations, requirements, guidelines and commonly followed industry standards, and information provided by the Client, their clients, agents, and representatives.

The work has been conducted in an objective and unbiased manner and in accordance with generally accepted professional practice for this type of work. One Source Environmental believes the data and analysis to be accurate and relevant but cannot accept responsibility for the accuracy or completeness of available documentation or possible withholding of information of other parties.

This hazardous materials survey report is designed to aid the property owner, architect, construction manager, general contractor, and asbestos abatement contractor in locating ACM. This report is not intended for and may not be utilized as a bidding document or as an abatement project specification document.

This report is provided for the sole use of the Client. Reliance on this report by any third parties will be at such party's sole risk, and One Source Environmental disclaims liability for any use of or reliance on this report by third parties. All portions of this report, including attachments and figures, are interrelated and integral to this report and should not be transmitted independent of each other.

### SAMPLE SUMMARY TABLE

Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
<b>Building A</b>			
HA01-A	Drywall	Unit 1, Living Room	None Detected
HA01-B	Drywall	Unit 2, Kitchen	None Detected
HA01-C	Drywall	Unit 3, Kitchen	None Detected
HA02-A	Joint Compound	Unit 1, Living Room	None Detected
HA02-B	Joint Compound	Unit 2, Living Room	None Detected
HA02-C	Joint Compound	Unit 3, Kitchen	None Detected
HA02-D	Joint Compound	Unit 4, Living Room	None Detected
HA02-E	Joint Compound	Unit 5, Kitchen	None Detected
HA02-F	Joint Compound	Unit 6, Living Room	None Detected
HA02-G	Joint Compound	Unit 7, Living Room	None Detected
HA03-A	White Ceiling Texture	Unit 1, Living Room	None Detected
HA03-B	White Ceiling Texture	Unit 2, Living Room	None Detected
HA03-C	White Ceiling Texture	Unit 3, Kitchen	None Detected
HA03-D	White Ceiling Texture	Unit 4, Living Room	None Detected
HA03-E	White Ceiling Texture	Unit 5, Kitchen	None Detected
HA03-F	White Ceiling Texture	Unit 6, Living Room	None Detected
HA04-A	White Interior Caulk	Unit 1, Living Room	None Detected
HA04-B	White Interior Caulk	Unit 2, Living Room	None Detected
HA04-C	White Interior Caulk	Unit 3, Kitchen	None Detected*
HA05-A	White Grout a/w 4"x4" White Wall Tile	Unit 1, Bathroom	None Detected
HA05-B	White Grout a/w 4"x4" White Wall Tile	Unit 2, Bathroom	None Detected
HA05-C	White Grout a/w 4"x4" White Wall Tile	Unit 4, Bathroom	None Detected
HA06-A	Gray HVAC Duct Mastic	Unit 1, Utility Closet	None Detected
HA06-B	Gray HVAC Duct Mastic	Unit 2, Utility Closet	None Detected
HA06-C	Gray HVAC Duct Mastic	Unit 3, Utility Closet	None Detected*
HA07-A	Black Window Caulk	Building A, Exterior, Front	None Detected
HA07-B	Black Window Caulk	Building A, Exterior, Front	None Detected
HA07-C	Black Window Caulk	Building A, Exterior, Front	None Detected*
HA08-A	White Door Caulk	Building A, Exterior, Front	None Detected
HA08-B	White Door Caulk	Building A, Exterior, Front	None Detected
HA08-C	White Door Caulk	Building A, Exterior, Front	None Detected*
HA09-A	Black Roof Shingle	Building A, Exterior, Front	None Detected
HA09-B	Black Roof Shingle	Building A, Exterior, Front	None Detected
HA09-C	Black Roof Shingle	Building A, Exterior, Front	None Detected*
HA10-A	Black Roof Felt	Building A, Exterior, Front	None Detected*

Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA10-B	Black Roof Felt	Building A, Exterior, Front	None Detected
HA10-C	Black Roof Felt	Building A, Exterior, Front	None Detected
<b>Building B</b>			
HA11-A	Drywall	Unit 11, Kitchen	None Detected
HA11-B	Drywall	Unit 12, Utility Closet	None Detected
HA11-C	Drywall	Unit 13, Utility Closet	None Detected
HA12-A	Joint Compound	Unit 11, Kitchen	None Detected
HA12-B	Joint Compound	Unit 12, Dining Room	None Detected
HA12-C	Joint Compound	Unit 13, Living Room	None Detected
HA12-D	Joint Compound	Unit 14, Living Room	None Detected
HA12-E	Joint Compound	Unit 15, Living Room	None Detected
HA12-F	Joint Compound	Unit 16, Living Room	None Detected
HA12-G	Joint Compound	Unit 17, Dining Room	None Detected
HA13-A	White Ceiling Texture	Unit 11, Hallway	None Detected
HA13-B	White Ceiling Texture	Unit 12, Dining Room	None Detected
HA13-C	White Ceiling Texture	Unit 13, Living Room	None Detected
HA13-D	White Ceiling Texture	Unit 14, Living Room	None Detected
HA13-E	White Ceiling Texture	Unit 15, Living Room	None Detected
HA13-F	White Ceiling Texture	Unit 16, Living Room	None Detected
HA13-G	White Ceiling Texture	Unit 17, Dining Room	None Detected
HA14-A	White Interior Caulk	Unit 11, Dining Room	None Detected
HA14-B	White Interior Caulk	Unit 12, Dining Room	None Detected
HA14-C	White Interior Caulk	Unit 13, Living Room	None Detected*
HA15-A	White Grout a/w 4"x4" White Wall Tile	Unit 13, 2nd Floor Bath	None Detected
HA15-B	White Grout a/w 4"x4" White Wall Tile	Unit 16, 2nd Floor Bath	None Detected
HA15-C	White Grout a/w 4"x4" White Wall Tile	Unit 18, Bathroom	None Detected
HA16-A	White HVAC Duct Mastic	Unit 11, Utility Closet	None Detected
HA16-B	White HVAC Duct Mastic	Unit 12, Utility Closet	None Detected
HA16-C	White HVAC Duct Mastic	Unit 13, Utility Closet	None Detected*
HA17-A	Black Window Caulk	Building B, Exterior Front	None Detected
HA17-B	Black Window Caulk	Building B, Exterior Front	None Detected
HA17-C	Black Window Caulk	Building B, Exterior Front	None Detected*
HA18-A	White Door Caulk	Building B, Exterior Front	None Detected
HA18-B	White Door Caulk	Building B, Exterior Front	None Detected
HA18-C	White Door Caulk	Building B, Exterior Front	None Detected*
HA19-A	Black Roof Shingle	Building B, Exterior Front	None Detected
HA19-B	Black Roof Shingle	Building B, Exterior Front	None Detected
HA19-C	Black Roof Shingle	Building B, Exterior Front	None Detected*
HA20-A	Black Roof Felt	Building B, Exterior Front	None Detected
HA20-B	Black Roof Felt	Building B, Exterior Front	None Detected
HA20-C	Black Roof Felt	Building B, Exterior Front	None Detected*
<b>Building C</b>			
HA21-A	Drywall	Unit 19, Hall Closet	None Detected
HA21-B	Drywall	Unit 20, Hall Closet	None Detected
HA21-C	Drywall	Unit 21, Kitchen	None Detected
HA22-A	Joint Compound	Unit 19, Hallway	None Detected
HA22-B	Joint Compound	Unit 20, Living Room	None Detected

Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA22-C	Joint Compound	Unit 21, Dining Room	None Detected
HA22-D	Joint Compound	Unit 22, Kitchen	None Detected
HA22-E	Joint Compound	Unit 23, Dining Room	None Detected
HA22-F	Joint Compound	Unit 24, Living Room	None Detected
HA22-G	Joint Compound	Unit 25, Hallway	None Detected
HA23-A	White Ceiling Texture	Unit 19, Hallway	None Detected
HA23-B	White Ceiling Texture	Unit 20, Living Room	None Detected
HA23-C	White Ceiling Texture	Unit 21, Dining Room	None Detected
HA23-D	White Ceiling Texture	Unit 22, Kitchen	None Detected
HA23-E	White Ceiling Texture	Unit 23, Dining Room	None Detected
HA23-F	White Ceiling Texture	Unit 24, Living Room	None Detected
HA23-G	White Ceiling Texture	Unit 25, Living Room	None Detected
HA24-A	White Interior Caulk	Unit 19, Hallway	None Detected
HA24-B	White Interior Caulk	Unit 20, Living Room	None Detected
HA24-C	White Interior Caulk	Unit 21, Dining Room	None Detected*
HA25-A	White Grout a/w 4"x4" White Wall Tile	Unit 19, Bathroom	None Detected
HA25-B	White Grout a/w 4"x4" White Wall Tile	Unit 20, Bathroom	None Detected
HA25-C	White Grout a/w 4"x4" White Wall Tile	Unit 21, 2nd Floor Bath	None Detected
HA26-A	White HVAC Duct Mastic	Unit 19, Utility	None Detected
HA26-B	White HVA Duct Mastic	Unit 21, Utility	None Detected
HA26-C	White HVA Duct Mastic	Unit 22, Utility	None Detected*
HA27-A	Black Window Caulk	Building C, Exterior Front	None Detected
HA27-B	Black Window Caulk	Building C, Exterior Front	None Detected
HA27-C	Black Window Caulk	Building C, Exterior Front	None Detected*
HA28-A	White Door Caulk	Building C, Exterior Front	None Detected
HA28-B	White Door Caulk	Building C, Exterior Front	None Detected
HA28-C	White Door Caulk	Building C, Exterior Front	None Detected*
HA29-A	Black Roof Shingle	Building C, Exterior Front	None Detected
HA29-B	Black Roof Shingle	Building C, Exterior Front	None Detected
HA29-C	Black Roof Shingle	Building C, Exterior Front	None Detected*
HA30-A	Black Roof Felt	Building C, Exterior Front	None Detected
HA30-B	Black Roof Felt	Building C, Exterior Front	None Detected
HA30-C	Black Roof Felt	Building C, Exterior Front	None Detected*
<b>Building D</b>			
HA31-A	Drywall	Unit 27, Utility	None Detected
HA31-B	Drywall	Unit 28, Hall Closet	None Detected
HA31-C	Drywall	Unit 29, Living Room	None Detected
HA32-A	Joint Compound	Unit 27, Kitchen	None Detected
HA32-B	Joint Compound	Unit 28, Dining Room	None Detected
HA32-C	Joint Compound	Unit 29, Kitchen	None Detected
HA32-D	Joint Compound	Unit 30, Kitchen	None Detected
HA32-E	Joint Compound	Unit 31, Kitchen	None Detected
HA32-F	Joint Compound	Unit 32, Kitchen	None Detected
HA32-G	Joint Compound	Unit 33, Kitchen	None Detected
HA33-A	White Ceiling Texture	Unit 27, Kitchen	None Detected
HA33-B	White Ceiling Texture	Unit 28, Kitchen	None Detected
HA33-C	White Ceiling Texture	Unit 29, Dining Room	None Detected
HA33-D	White Ceiling Texture	Unit 30, Living Room	None Detected
HA33-E	White Ceiling Texture	Unit 31, Dining Room	None Detected

Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA33-F	White Ceiling Texture	Unit 32, Kitchen	None Detected
HA33-G	White Ceiling Texture	Unit 33, Kitchen	None Detected
HA34-A	White Interior Caulk	Unit 27, Bathroom	None Detected
HA34-B	White Interior Caulk	Unit 28, Dining Room	None Detected
HA34-C	White Interior Caulk	Unit 29, Living Room	None Detected*
HA35-A	White Grout a/w 4"x4" White Wall Tile	Unit 27, Bathroom	None Detected
HA35-B	White Grout a/w 4"x4" White Wall Tile	Unit 28, Bathroom	None Detected
HA35-C	White Grout a/w 4"x4" White Wall Tile	Unit 29, Bathroom	None Detected
HA36-A	White HVAC Duct Mastic	Unit 27, Utility Closet	None Detected
HA36-B	White HVAC Duct Mastic	Unit 29, Utility Closet	None Detected
HA36-C	White HVAC Duct Mastic	Unit 30, Utility Closet	None Detected*
HA37-A	Black Window Caulk	Building D, Exterior Front	None Detected
HA37-B	Black Window Caulk	Building D, Exterior Front	None Detected
HA37-C	Black Window Caulk	Building D, Exterior Front	None Detected*
HA38-A	White Door Caulk	Building D, Exterior Front	None Detected
HA38-B	White Door Caulk	Building D, Exterior Front	None Detected
HA38-C	White Door Caulk	Building D, Exterior Front	None Detected*
HA39-A	Black Roof Shingle	Building D, Exterior Front	None Detected
HA39-B	Black Roof Shingle	Building D, Exterior Front	None Detected
HA39-C	Black Roof Shingle	Building D, Exterior Front	None Detected*
HA40-A	Black Roof Felt	Building D, Exterior Front	None Detected
HA40-B	Black Roof Felt	Building D, Exterior Front	None Detected
HA40-C	Black Roof Felt	Building D, Exterior Front	None Detected*
<b>Building E</b>			
HA41-A	Drywall	Unit 35, Hall Closet	None Detected
HA41-B	Drywall	Unit 36, Hall Closet	None Detected
HA41-C	Drywall	Unit 37, Utility Closet	None Detected
HA42-A	Joint Compound	Unit 35, Living Room	None Detected
HA42-B	Joint Compound	Unit 35, Hallway	None Detected
HA42-C	Joint Compound	Unit 26, Kitchen	None Detected
HA42-D	Joint Compound	Unit 37, Utility Closet	None Detected
HA42-E	Joint Compound	Unit 38, Living Room	None Detected
HA42-F	Joint Compound	Office, Kitchen	None Detected
HA42-G	Joint Compound	Office, Storage Room	None Detected
HA43-A	White Ceiling Texture	Unit 35, Living Room	None Detected
HA43-B	White Ceiling Texture	Unit 35, Hallway	None Detected
HA43-C	White Ceiling Texture	Unit 36, Dining Room	None Detected
HA43-D	White Ceiling Texture	Unit 37, Living Room	None Detected
HA43-E	White Ceiling Texture	Unit 38, Living Room	None Detected
HA43-F	White Ceiling Texture	Office, Kitchen	None Detected
HA43-G	White Ceiling Texture	Office, Hallway	None Detected
HA03-G	White Ceiling Texture	Unit 7, Living Room	None Detected
HA44-A	White Interior Caulk	Unit 35, Dining Room	None Detected
HA44-B	White Interior Caulk	Unit 36, Dining Room	None Detected
HA44-C	White Interior Caulk	Unit 37, Living Room	None Detected*
HA45-A	White Grout a/w 4"x4" White Wall Tile	Unit 35, Bathroom	None Detected
HA45-B	White Grout a/w 4"x4" White Wall Tile	Unit 36, Bathroom	None Detected
HA45-C	White Grout a/w 4"x4" White Wall Tile	Unit 37, Bathroom	None Detected
HA46-A	Gray HVAC Duct Mastic	Unit 35, Utility Closet	None Detected

Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA46-B	Gray HVAC Duct Mastic	Unit 36, Utility Closet	None Detected
HA46-C	Gray HVAC Duct Mastic	Unit 37, Utility Closet	None Detected*
HA47-A (Layer 1)	Cove Base - Gray	Office, Kitchen	None Detected
HA47-A (Layer 2)	Mastic - Cream	Office, Kitchen	None Detected
HA47-B (Layer 1)	Cove Base - Gray	Office, Kitchen	None Detected
HA47-B (Layer 2)	Mastic - Cream	Office, Kitchen	None Detected
HA47-C (Layer 1)	Cove Base - Gray	Office, Kitchen	None Detected*
HA47-C (Layer 2)	Mastic - Cream	Office, Kitchen	None Detected*
HA48-A (Layer 1)	Cove Base - Brown	Office, Storage Room	None Detected
HA48-A (Layer 2)	Mastic - Cream	Office, Storage Room	None Detected
HA48-B (Layer 1)	Cove Base - Brown	Office, Storage Room	None Detected
HA48-B (Layer 2)	Mastic - Cream	Office, Storage Room	None Detected
HA48-C (Layer 1)	Cove Base - Brown	Office, Storage Room	None Detected*
HA48-C (Layer 2)	Mastic - Cream	Office, Storage Room	None Detected*
HA49-A	Black Window Caulk	Building E, Exterior Front	None Detected
HA49-B	Black Window Caulk	Building E, Exterior Front	None Detected
HA49-C	Black Window Caulk	Building E, Exterior Front	None Detected*
HA50-A	White Door Caulk	Building E, Exterior Front	None Detected
HA50-B	White Door Caulk	Building E, Exterior Front	None Detected
HA50-C	White Door Caulk	Building E, Exterior Front	None Detected*
HA51-A	Black Roof Shingle	Building E, Exterior Front	None Detected
HA51-B	Black Roof Shingle	Building E, Exterior Front	None Detected
HA51-C	Black Roof Shingle	Building E, Exterior Front	None Detected*
HA52-A	Black Roof Felt	Building E, Exterior Front	None Detected
HA52-B	Black Roof Felt	Building E, Exterior Front	None Detected
HA52-C	Black Roof Felt	Building E, Exterior Front	None Detected*
<b>Building F</b>			
HA53-A	Drywall	Unit 39, Hallway	None Detected
HA53-B	Drywall	Unit 40, Living Room	None Detected
HA53-C	Drywall	Unit 41, Living Room	None Detected
HA54-A	Joint Compound	Unit 39, Kitchen	None Detected
HA54-B	Joint Compound	Unit 40, Living Room	None Detected
HA54-C	Joint Compound	Unit 41, Living Room	None Detected
HA54-D	Joint Compound	Unit 42, Kitchen	None Detected
HA54-E	Joint Compound	Unit 43, Living Room	None Detected
HA54-F	Joint Compound	Unit 44, Living Room	None Detected
HA54-G	Joint Compound	Unit 45, Kitchen	None Detected
HA55-A	White Ceiling Texture	Unit 39, Hallway	None Detected
HA55-B	White Ceiling Texture	Unit 40, Living Room	None Detected
HA55-C	White Ceiling Texture	Unit 41, Living Room	None Detected
HA55-D	White Ceiling Texture	Unit 42, Kitchen	None Detected
HA55-E	White Ceiling Texture	Unit 43, Living Room	None Detected
HA55-F	White Ceiling Texture	Unit 44, Living Room	None Detected
HA55-G	White Ceiling Texture	Unit 45, Living Room	None Detected
HA56-A	White Interior Caulk	Unit 39, Dining Room	None Detected
HA56-B	White Interior Caulk	Unit 40, Living Room	None Detected



Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA56-C	White Interior Caulk	Unit 41, Dining Room	None Detected*
HA57-A	White Grout a/w 4"x4" White Wall Tile	Unit 39, Bathroom	None Detected
HA57-B	White Grout a/w 4"x4" White Wall Tile	Unit 40, Bathroom	None Detected
HA57-C	White Grout a/w 4"x4" White Wall Tile	Unit 41, 2Nd Floor Bath	None Detected
HA58-A	White HVAC Duct Mastic	Unit 39, Utility Closet	None Detected
HA58-B	White HVAC Duct Mastic	Unit 40, Utility Closet	None Detected
HA58-C	White HVAC Duct Mastic	Unit 41, Utility Closet	None Detected*
HA59-A	Black Window Caulk	Building F, Exterior Front	None Detected
HA59-B	Black Window Caulk	Building F, Exterior Front	None Detected
HA59-C	Black Window Caulk	Building F, Exterior Front	None Detected*
HA60-A	White Door Caulk	Building F, Exterior Front	None Detected
HA60-B	White Door Caulk	Building F, Exterior Front	None Detected
HA60-C	White Door Caulk	Building F, Exterior Front	None Detected*
HA61-A	Black Roof Shingle	Building F, Exterior Front	None Detected
HA61-B	Black Roof Shingle	Building F, Exterior Front	None Detected
HA61-C	Black Roof Shingle	Building F, Exterior Front	None Detected*
HA62-A	Black Roof Felt	Building F, Exterior Front	None Detected
HA62-B	Black Roof Felt	Building F, Exterior Front	None Detected
HA62-C	Black Roof Felt	Building F, Exterior Front	None Detected*
<b>Maintenance Building</b>			
HA63-A	Drywall	Maintenance, Hallway	None Detected
HA63-B	Drywall	Maintenance, Hallway	None Detected
HA63-C	Drywall	Maintenance, Left Central Office	None Detected
HA64-A	Joint Compound	Maintenance, Hallway	None Detected
HA64-B	Joint Compound	Maintenance, Hallway	None Detected
HA64-C	Joint Compound	Maintenance, Left Central Office	None Detected
HA65-A (Layer 1)	Cove Base - Gray	Maintenance, Left Central Office	None Detected
HA65-A (Layer 2)	Mastic - Beige	Maintenance, Left Central Office	None Detected
HA65-B (Layer 1)	Cove Base - Beige	Maintenance, Hallway	None Detected
HA65-B (Layer 2)	Mastic - Beige	Maintenance, Hallway	None Detected
HA65-C (Layer 1)	Cove Base - Gray	Maintenance, Hallway	None Detected*
HA65-C (Layer 2)	Mastic - Beige	Maintenance, Hallway	None Detected*
HA66-A	White Interior Caulk	Maintenance, Hallway	None Detected
HA66-B	White Interior Caulk	Maintenance, Hallway	None Detected
HA66-C	White Interior Caulk	Maintenance, Hallway	None Detected*
HA67-A	White Door Caulk	Maintenance, Exterior, Front	None Detected
HA67-B	White Door Caulk	Maintenance, Exterior, Front	None Detected
HA67-C	White Door Caulk	Maintenance, Exterior, Rear	None Detected*
HA68-A	White Window Caulk	Maintenance, Exterior, Front	None Detected



Northgate Manor – 220 Biblebrook Drive, Greer, SC 29651			
SAMPLE NUMBER	SAMPLED MATERIAL	LOCATION	% ASBESTOS
HA68-B	White Window Caulk	Maintenance, Exterior Front	None Detected
HA68-C	White Window Caulk	Maintenance, Exterior Front	None Detected*
HA69-A	Black Roof Shingle	Maintenance, Exterior Front	None Detected
HA69-B	Black Roof Shingle	Maintenance, Exterior Front	None Detected
HA69-C	Black Roof Shingle	Maintenance, Exterior Front	None Detected*
HA70-A	Black Roof Felt	Maintenance, Exterior Front	None Detected
HA70-B	Black Roof Felt	Maintenance, Exterior Front	None Detected
HA70-C	Black Roof Felt	Maintenance, Exterior Front	None Detected*

\* = NOB material analyzed via TEM      a/w = associated with

## **APPENDIX A**

### **LABORATORY ANALYTICAL DATA**



**AmeriSci Richmond**

13635 GENITO ROAD  
MIDLOTHIAN, VIRGINIA 23112  
TEL: 8047631200 FAX: 8047631800

October 14, 2024

Dominion Due Diligence Group  
Attn: Kim Dingleline  
201 Wylderose Drive  
Midlothian, VA 23113

RE: Dominion Due Diligence Group  
Job Number 124101364  
P.O. #2024-1708  
2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Dear Kim Dingleline:

Enclosed are the results for PLM asbestos analysis of the following Dominion Due Diligence Group samples received at AmeriSci on Wednesday, October 9, 2024, for a 48 hour turnaround:

Sample ID HA01-A through HA70-C

The 258 samples contained in zip lock bag were shipped to AmeriSci via Fed Ex 7301 7891 8101 B 950. These samples were prepared and analyzed according to EPA PLM Method (EPA 600/R-93/116 Section 2.2). The required analytical information, analysis results, analyst signature and laboratory identification are contained in the PLM Bulk Asbestos Report. If TEM analysis was requested for selected samples the gravimetric reduction data (by Sec 2.3) and TEM Asbestos % (by Sec 2.5) are included in Table 1 along with a summary of Asbestos % by PLM for all samples analyzed.

This report relates ONLY to the sample analysis expressed as % asbestos. AmeriSci assumes no responsibility for customer supplied data such as "sample type", "location", or "area sampled". This report must not be used to claim product endorsement by AmeriSci, NVLAP or any agency of the U. S. Government. The National Institute of Standards and Technology accreditation requirements mandate that this report must not be reproduced, except in full, without the written approval of the laboratory. This report may contain specific data not covered by NVLAP or ELAP accreditations, if so identified in relevant footnotes.

AmeriSci appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cory M. Parnell'.

Cory M. Parnell  
Laboratory Director | Authorized Signatory

**AmeriSci Richmond**

13635 GENITO ROAD  
MIDLOTHIAN, VIRGINIA 23112  
TEL: (804) 763-1200 • FAX: (804) 763-1800

**PLM Bulk Asbestos Report**

Dominion Due Diligence Group  
Attn: Kim Dingleline  
201 Wylderose Drive

**Date Received** 10/9/2024  
**Date Examined** 10/10/24

**AmeriSci Job #** 124101364

**P.O. #**

**Page** 1 **of** 39

**RE:** 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Midlothian, VA 23113

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA01-A	124101364-01	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 1, Living Room <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA01-B	124101364-02	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 2, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA01-C	124101364-03	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 3, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA02-A	124101364-04	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 1, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA02-B	124101364-05	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 2, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA02-C	124101364-06	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 3, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA02-D	124101364-07	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 4, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA02-E	124101364-08	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 5, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA02-F	124101364-09	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 6, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA02-G	124101364-10	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 7, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA03-A	124101364-11	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 1, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 98%, Vermiculite 2.0%
HA03-B	124101364-12	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 2, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA03-C	124101364-13	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 3, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 98%, Vermiculite 2.0%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA03-D	124101364-14	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 4, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA03-E	124101364-15	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 5, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA03-F	124101364-16	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 6, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 98%, Vermiculite 2.0%
HA03-G	124101364-17	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 7, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 98%, Vermiculite 2.0%
HA04-A	124101364-18	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 1, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA04-B	124101364-19	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 2, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA04-C	124101364-20		NA	<b>Location:</b> White Interior Caulk; Unit 3, Kitchen <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA05-A	124101364-21	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 1, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA05-B	124101364-22	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 2, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA05-C	124101364-23	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 4, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA06-A	124101364-24	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Hvac Duct Mastic; Unit 1, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA06-B	124101364-25	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Hvac Duct Mastic; Unit 2, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA06-C	124101364-26		NA	<b>Location:</b> Gray Hvac Duct Mastic; Unit 3, Utility Closet <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA07-A	124101364-27	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA07-B	124101364-28	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA07-C	124101364-29		NA	<b>Location:</b> Black Window Caulk; Building A, Exterior, Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA08-A	124101364-30	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Door Caulk; Building A, Exterior, Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA08-B	124101364-31	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Door Caulk; Building A, Exterior, Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA08-C	124101364-32		NA	<b>Location:</b> White Door Caulk; Building A, Exterior, Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA09-A	124101364-33	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Shingle; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%
HA09-B	124101364-34	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Shingle; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%



**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA09-C	124101364-35		NA	
<b>Location:</b> Black Roof Shingle; Building A, Exterior, Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA10-A	124101364-36	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA10-B	124101364-37	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building A, Exterior, Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA10-C	124101364-38		NA	
<b>Location:</b> Black Roof Felt; Building A, Exterior, Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA11-A	124101364-39	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Drywall; Unit 11, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%				
HA11-B	124101364-40	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Drywall; Unit 12, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%				
HA11-C	124101364-41	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Drywall; Unit 13, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%				

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA12-A	124101364-42	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 11, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-B	124101364-43	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 12, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-C	124101364-44	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 13, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-D	124101364-45	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 14, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-E	124101364-46	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 15, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-F	124101364-47	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 16, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA12-G	124101364-48	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 17, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA13-A	124101364-49	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 11, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-B	124101364-50	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 12, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-C	124101364-51	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 13, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-D	124101364-52	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 14, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-E	124101364-53	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 15, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-F	124101364-54	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 16, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA13-G	124101364-55	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 17, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA14-A	124101364-56	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 11, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA14-B	124101364-57	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 12, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA14-C	124101364-58		NA	<b>Location:</b> White Interior Caulk; Unit 13, Living Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA15-A	124101364-59	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 13, 2nd Floor Bath <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA15-B	124101364-60	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 16, 2nd Floor Bath <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA15-C	124101364-61	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4X4 White Wall Tile; Unit 18, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA16-A	124101364-62	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 11, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA16-B	124101364-63	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 12, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA16-C	124101364-64		NA	<b>Location:</b> White Hvac Duct Mastic; Unit 13, Utility Closet <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA17-A	124101364-65	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA17-B	124101364-66	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA17-C	124101364-67		NA	<b>Location:</b> Black Window Caulk; Building B, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA18-A	124101364-68	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Door Caulk; Building B, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA18-B	124101364-69	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Door Caulk; Building B, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA18-C	124101364-70		NA	
<b>Location:</b> White Door Caulk; Building B, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA19-A	124101364-71	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA19-B	124101364-72	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA19-C	124101364-73		NA	
<b>Location:</b> Black Roof Shingle; Building B, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA20-A	124101364-74	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA20-B	124101364-75	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building B, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA20-C	124101364-76		NA	
<b>Location:</b> Black Roof Felt; Building B, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA21-A	124101364-77	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 19, Hall Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA21-B	124101364-78	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 20, Hall Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA21-C	124101364-79	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 21, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA22-A	124101364-80	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 19, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA22-B	124101364-81	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 20, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA22-C	124101364-82	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 21, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA22-D	124101364-83	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 22, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA22-E	124101364-84	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 23, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA22-F	124101364-85	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 24, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA22-G	124101364-86	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 25, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-A	124101364-87	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 19, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-B	124101364-88	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 20, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-C	124101364-89	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 21, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-D	124101364-90	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 22, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%



Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA23-E	124101364-91	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 23, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-F	124101364-92	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 24, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA23-G	124101364-93	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 25, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA24-A	124101364-94	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 19, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA24-B	124101364-95	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 20, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA24-C	124101364-96		NA	<b>Location:</b> White Interior Caulk; Unit 21, Dining Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA25-A	124101364-97	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 19, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA25-B	124101364-98	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 20, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA25-C	124101364-99	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 21, 2nd Floor Bath <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA26-A	124101364-100	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 19, Utility <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA26-B	124101364-101	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 21, Utility <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA26-C	124101364-102		NA	<b>Location:</b> White Hvac Duct Mastic; Unit 22, Utility <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA27-A	124101364-103	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA27-B	124101364-104	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Window Caulk; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA27-C	124101364-105		NA	
<b>Location:</b> Black Window Caulk; Building C, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA28-A	124101364-106	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building C, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA28-B	124101364-107	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building C, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA28-C	124101364-108		NA	
<b>Location:</b> White Door Caulk; Building C, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA29-A	124101364-109	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA29-B	124101364-110	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA29-C	124101364-111		NA	
<b>Location:</b> Black Roof Shingle; Building C, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA30-A	124101364-112	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Felt; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%
HA30-B	124101364-113	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Felt; Building C, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%
HA30-C	124101364-114		NA	<b>Location:</b> Black Roof Felt; Building C, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA31-A	124101364-115	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 27, Utility <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA31-B	124101364-116	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 28, Hall Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA31-C	124101364-117	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 29, Living Room <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA32-A	124101364-118	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 27, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA32-B	124101364-119	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 28, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA32-C	124101364-120	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 29, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA32-D	124101364-121	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 30, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA32-E	124101364-122	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 31, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA32-F	124101364-123	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 32, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA32-G	124101364-124	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 33, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-A	124101364-125	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 27, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA33-B	124101364-126	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 28, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-C	124101364-127	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 29, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-D	124101364-128	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 30, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-E	124101364-129	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 31, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-F	124101364-130	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 32, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA33-G	124101364-131	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 33, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA34-A	124101364-132	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 27, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA34-B	124101364-133	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 28, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA34-C	124101364-134		NA	<b>Location:</b> White Interior Caulk; Unit 29, Living Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA35-A	124101364-135	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 27, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA35-B	124101364-136	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 28, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA35-C	124101364-137	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 29, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA36-A	124101364-138	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 27, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA36-B	124101364-139	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 29, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA36-C	124101364-140		NA	
<b>Location:</b> White Hvac Duct Mastic; Unit 30, Utility Closet <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA37-A	124101364-141	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Window Caulk; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA37-B	124101364-142	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Window Caulk; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA37-C	124101364-143		NA	
<b>Location:</b> Black Window Caulk; Building D, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA38-A	124101364-144	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building D, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA38-B	124101364-145	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building D, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA38-C	124101364-146		NA	
<b>Location:</b> White Door Caulk; Building D, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				



Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA39-A	124101364-147	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Shingle; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%
HA39-B	124101364-148	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Shingle; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%
HA39-C	124101364-149		NA	<b>Location:</b> Black Roof Shingle; Building D, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA40-A	124101364-150	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Felt; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%
HA40-B	124101364-151	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Black Roof Felt; Building D, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%
HA40-C	124101364-152		NA	<b>Location:</b> Black Roof Felt; Building D, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA41-A	124101364-153	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 35, Hall Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA41-B	124101364-154	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 36, Hall Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA41-C	124101364-155	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 37, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA42-A	124101364-156	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 35, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA42-B	124101364-157	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 35, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA42-C	124101364-158	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 26, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA42-D	124101364-159	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 37, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA42-E	124101364-160	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 38, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

## PLM Bulk Asbestos Report

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA42-F	124101364-161	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Office, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA42-G	124101364-162	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Office, Storage Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-A	124101364-163	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 35, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-B	124101364-164	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 35, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-C	124101364-165	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 36, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-D	124101364-166	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 37, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-E	124101364-167	No	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 38, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA43-F	124101364-168	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Office, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA43-G	124101364-169	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Office, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA44-A	124101364-170	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 35, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA44-B	124101364-171	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 36, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA44-C	124101364-172		NA	<b>Location:</b> White Interior Caulk; Unit 37, Living Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA45-A	124101364-173	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 35, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA45-B	124101364-174	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 36, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA45-C	124101364-175	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 37, Bathroom <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA46-A	124101364-176	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Hvac Duct Mastic; Unit 35, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA46-B	124101364-177	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Hvac Duct Mastic; Unit 36, Utility Closet <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA46-C	124101364-178		NA	<b>Location:</b> Gray Hvac Duct Mastic; Unit 37, Utility Closet <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA47-A	124101364-179L1	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA47-A	124101364-179L2	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Cream, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA47-B	124101364-180L1	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA47-B	124101364-180L2	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Cream, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA47-C	124101364-181L1		NA	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA47-C	124101364-181L2		NA	<b>Location:</b> Gray Cove Base; Office, Kitchen <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA48-A	124101364-182L1	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Brown Cove Base; Office, Storage Room <b>Analyst Description:</b> Brown, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA48-A	124101364-182L2	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Brown Cove Base; Office, Storage Room <b>Analyst Description:</b> Cream, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA48-B	124101364-183L1	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Brown Cove Base; Office, Storage Room <b>Analyst Description:</b> Brown, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA48-B	124101364-183L2	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Brown Cove Base; Office, Storage Room <b>Analyst Description:</b> Cream, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA48-C	124101364-184L1		NA	
<b>Location:</b> Brown Cove Base; Office, Storage Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA48-C	124101364-184L2		NA	
<b>Location:</b> Brown Cove Base; Office, Storage Room Insufficient Material Submitted For Preparation <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA49-A	124101364-185	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Window Caulk; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA49-B	124101364-186	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Window Caulk; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA49-C	124101364-187		NA	
<b>Location:</b> Black Window Caulk; Building E, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA50-A	124101364-188	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building E, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA50-B	124101364-189	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> White Door Caulk; Building E, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA50-C	124101364-190		NA	
<b>Location:</b> White Door Caulk; Building E, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA51-A	124101364-191	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA51-B	124101364-192	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 10%, Non-fibrous 90%				
HA51-C	124101364-193		NA	
<b>Location:</b> Black Roof Shingle; Building E, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA52-A	124101364-194	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA52-B	124101364-195	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	
<b>Location:</b> Black Roof Felt; Building E, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%				
HA52-C	124101364-196		NA	
<b>Location:</b> Black Roof Felt; Building E, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				



Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA53-A	124101364-197	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 39, Hallway <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA53-B	124101364-198	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 40, Living Room <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA53-C	124101364-199	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Drywall; Unit 41, Living Room <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 2.0%, Non-fibrous 98%
HA54-A	124101364-200	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 39, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA54-B	124101364-201	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 40, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA54-C	124101364-202	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 41, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA54-D	124101364-203	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 42, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA54-E	124101364-204	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 43, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA54-F	124101364-205	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 44, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA54-G	124101364-206	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> Joint Compound; Unit 45, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-A	124101364-207	<b>No</b>	NAD (by CVES) by Tou Si Anothay on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 39, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-B	124101364-208	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 40, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-C	124101364-209	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 41, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-D	124101364-210	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 42, Kitchen <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA55-E	124101364-211	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 43, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-F	124101364-212	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 44, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA55-G	124101364-213	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Ceiling Texture; Unit 45, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA56-A	124101364-214	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 39, Dining Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA56-B	124101364-215	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Interior Caulk; Unit 40, Living Room <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA56-C	124101364-216		NA	<b>Location:</b> White Interior Caulk; Unit 41, Dining Room <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA57-A	124101364-217	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 39, Bathroom <b>Analyst Description:</b> Off-White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA57-B	124101364-218	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 40, Bathroom <b>Analyst Description:</b> Off-White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA57-C	124101364-219	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Grout Ass. W/ 4x4 White Wall Tile; Unit 41, 2Nd Floor Bath <b>Analyst Description:</b> Off-White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA58-A	124101364-220	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 39, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA58-B	124101364-221	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Hvac Duct Mastic; Unit 40, Utility Closet <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA58-C	124101364-222		NA	<b>Location:</b> White Hvac Duct Mastic; Unit 41, Utility Closet <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA59-A	124101364-223	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Window Caulk; Building F, Exterior Front <b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA59-B	124101364-224	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Window Caulk; Building F, Exterior Front <b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA59-C	124101364-225		NA	
<b>Location:</b> Black Window Caulk; Building F, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA60-A	124101364-226	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Door Caulk; Building F, Exterior Front <b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA60-B	124101364-227	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Door Caulk; Building F, Exterior Front <b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA60-C	124101364-228		NA	
<b>Location:</b> White Door Caulk; Building F, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA61-A	124101364-229	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building F, Exterior Front <b>Analyst Description:</b> Gray/Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 5.0%, Non-fibrous 95%				
HA61-B	124101364-230	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> Black Roof Shingle; Building F, Exterior Front <b>Analyst Description:</b> Gray/Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 5.0%, Non-fibrous 95%				
HA61-C	124101364-231		NA	
<b>Location:</b> Black Roof Shingle; Building F, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA62-A	124101364-232	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Roof Felt; Building F, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 60%, Non-fibrous 40%
HA62-B	124101364-233	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Roof Felt; Building F, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 60%, Non-fibrous 40%
HA62-C	124101364-234		NA	<b>Location:</b> Black Roof Felt; Building F, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA63-A	124101364-235	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Drywall; Maintenance, Hallway <b>Analyst Description:</b> Brown/White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 3.0%, Non-fibrous 97%
HA63-B	124101364-236	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Drywall; Maintenance, Hallway <b>Analyst Description:</b> Brown/White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 3.0%, Non-fibrous 97%
HA63-C	124101364-237	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Drywall; Maintenance, Left Central Office <b>Analyst Description:</b> Brown/White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 3.0%, Non-fibrous 97%
HA64-A	124101364-238	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Joint Compound; Maintenance, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA64-B	124101364-239	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Joint Compound; Maintenance, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA64-C	124101364-240	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Joint Compound; Maintenance, Left Central Office <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA65-A	124101364-241L1	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Beige Cove Base; Maintenance, Left Central Office <b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA65-A	124101364-241L2	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Beige Cove Base; Maintenance, Left Central Office <b>Analyst Description:</b> Beige, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA65-B	124101364-242L1	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Beige Cove Base; Maintenance, Hallway <b>Analyst Description:</b> Beige, Heterogeneous, Non-Fibrous, Cove Base <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA65-B	124101364-242L2	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Beige Cove Base; Maintenance, Hallway <b>Analyst Description:</b> Beige, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA65-C	124101364-243L1		NA	<b>Location:</b> Beige Cove Base; Maintenance, Hallway <b>Analyst Description:</b> Cove Base <b>Asbestos Types:</b> <b>Other Material:</b>

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA65-C	124101364-243L2		NA	
<b>Location:</b> Beige Cove Base; Maintenance, Hallway Insufficient Material Submitted For Preparation <b>Analyst Description:</b> Mastic <b>Asbestos Types:</b> <b>Other Material:</b>				
HA66-A	124101364-244	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Interior Caulk; Maintenance, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA66-B	124101364-245	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Interior Caulk; Maintenance, Hallway <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA66-C	124101364-246		NA	
<b>Location:</b> White Interior Caulk; Maintenance, Hallway <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				
HA67-A	124101364-247	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Door Caulk; Maintenance, Exterior, Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA67-B	124101364-248	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> White Door Caulk; Maintenance, Exterior, Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%				
HA67-C	124101364-249		NA	
<b>Location:</b> White Door Caulk; Maintenance, Exterior, Rear <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				



Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA68-A	124101364-250	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Window Caulk; Maintenance, Exterior, Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA68-B	124101364-251	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> White Window Caulk; Maintenance, Exterior Front <b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%
HA68-C	124101364-252		NA	<b>Location:</b> White Window Caulk; Maintenance, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA69-A	124101364-253	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Roof Shingle; Maintenance, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 5.0%, Non-fibrous 95%
HA69-B	124101364-254	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Roof Shingle; Maintenance, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 5.0%, Non-fibrous 95%
HA69-C	124101364-255		NA	<b>Location:</b> Black Roof Shingle; Maintenance, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>
HA70-A	124101364-256	<b>No</b>	NAD (by CVES) by William M. Dunstan on 10/10/24	<b>Location:</b> Black Roof Felt; Maintenance, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 7.0%, Non-fibrous 93%

Client Name: Dominion Due Diligence Group

**PLM Bulk Asbestos Report**

2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
HA70-B	124101364-257	No	NAD (by CVES) by William M. Dunstan on 10/10/24	
<b>Location:</b> Black Roof Felt; Maintenance, Exterior Front <b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Fibrous glass 7.0%, Non-fibrous 93%				
HA70-C	124101364-258		NA	
<b>Location:</b> Black Roof Felt; Maintenance, Exterior Front <b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>				

**Reporting Notes:**

Analyzed by: Tou Si Anothay

Date: 10/10/2024



Reviewed by: Cory M. Parnell



\*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Meiji, Model MT 6120 microscope, Serial #1900011, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
01	HA01-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 1, Living Room							
02	HA01-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 2, Kitchen							
03	HA01-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 3, Kitchen							
04	HA02-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 1, Living Room							
05	HA02-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 2, Living Room							
06	HA02-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 3, Kitchen							
07	HA02-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 4, Living Room							
08	HA02-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 5, Kitchen							
09	HA02-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 6, Living Room							
10	HA02-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 7, Living Room							
11	HA03-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 1, Living Room							
12	HA03-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 2, Living Room							
13	HA03-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 3, Kitchen							
14	HA03-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 4, Living Room							
15	HA03-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 5, Kitchen							
16	HA03-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 6, Living Room							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
17	HA03-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 7, Living Room							
18	HA04-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 1, Living Room							
19	HA04-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 2, Living Room							
20	HA04-C		0.459	24.8	71.9	3.3	NA	NAD
	Location: White Interior Caulk; Unit 3, Kitchen							
21	HA05-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 1, Bathroom							
22	HA05-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 2, Bathroom							
23	HA05-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 4, Bathroom							
24	HA06-A		----	----	----	----	NAD	NA
	Location: Gray Hvac Duct Mastic; Unit 1, Utility Closet							
25	HA06-B		----	----	----	----	NAD	NA
	Location: Gray Hvac Duct Mastic; Unit 2, Utility Closet							
26	HA06-C		0.441	41.9	31.2	26.9	NA	NAD
	Location: Gray Hvac Duct Mastic; Unit 3, Utility Closet							
27	HA07-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building A, Exterior, Front							
28	HA07-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building A, Exterior, Front							
29	HA07-C		0.437	69.6	22.8	7.6	NA	NAD
	Location: Black Window Caulk; Building A, Exterior, Front							
30	HA08-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building A, Exterior, Front							
31	HA08-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building A, Exterior, Front							
32	HA08-C		0.230	39.9	42.7	17.4	NA	NAD
	Location: White Door Caulk; Building A, Exterior, Front							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
33	HA09-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building A, Exterior, Front							
34	HA09-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building A, Exterior, Front							
35	HA09-C		0.506	22.2	47.8	30.0	NA	NAD
	Location: Black Roof Shingle; Building A, Exterior, Front							
36	HA10-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building A, Exterior, Front							
37	HA10-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building A, Exterior, Front							
38	HA10-C		0.141	96.5	3.3	0.2	NA	NAD
	Location: Black Roof Felt; Building A, Exterior, Front							
39	HA11-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 11, Kitchen							
40	HA11-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 12, Utility Closet							
41	HA11-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 13, Utility Closet							
42	HA12-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 11, Kitchen							
43	HA12-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 12, Dining Room							
44	HA12-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 13, Living Room							
45	HA12-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 14, Living Room							
46	HA12-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 15, Living Room							
47	HA12-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 16, Living Room							
48	HA12-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 17, Dining Room							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
49	HA13-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 11, Hallway							
50	HA13-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 12, Dining Room							
51	HA13-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 13, Living Room							
52	HA13-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 14, Living Room							
53	HA13-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 15, Living Room							
54	HA13-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 16, Living Room							
55	HA13-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 17, Dining Room							
56	HA14-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 11, Dining Room							
57	HA14-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 12, Dining Room							
58	HA14-C		0.117	42.4	11.8	45.8	NA	NAD
	Location: White Interior Caulk; Unit 13, Living Room							
59	HA15-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 13, 2nd Floor Bath							
60	HA15-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 16, 2nd Floor Bath							
61	HA15-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4X4 White Wall Tile; Unit 18, Bathroom							
62	HA16-A		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 11, Utility Closet							
63	HA16-B		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 12, Utility Closet							
64	HA16-C		0.289	45.9	32.3	21.9	NA	NAD
	Location: White Hvac Duct Mastic; Unit 13, Utility Closet							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
65	HA17-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building B, Exterior Front							
66	HA17-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building B, Exterior Front							
67	HA17-C		0.567	70.9	21.9	7.3	NA	NAD
	Location: Black Window Caulk; Building B, Exterior Front							
68	HA18-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building B, Exterior Front							
69	HA18-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building B, Exterior Front							
70	HA18-C		0.255	36.7	49.5	13.7	NA	NAD
	Location: White Door Caulk; Building B, Exterior Front							
71	HA19-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building B, Exterior Front							
72	HA19-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building B, Exterior Front							
73	HA19-C		0.360	19.6	45.0	35.4	NA	NAD
	Location: Black Roof Shingle; Building B, Exterior Front							
74	HA20-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building B, Exterior Front							
75	HA20-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building B, Exterior Front							
76	HA20-C		0.179	96.4	3.5	0.1	NA	NAD
	Location: Black Roof Felt; Building B, Exterior Front							
77	HA21-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 19, Hall Closet							
78	HA21-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 20, Hall Closet							
79	HA21-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 21, Kitchen							
80	HA22-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 19, Hallway							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
81	HA22-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 20, Living Room							
82	HA22-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 21, Dining Room							
83	HA22-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 22, Kitchen							
84	HA22-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 23, Dining Room							
85	HA22-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 24, Living Room							
86	HA22-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 25, Hallway							
87	HA23-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 19, Hallway							
88	HA23-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 20, Living Room							
89	HA23-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 21, Dining Room							
90	HA23-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 22, Kitchen							
91	HA23-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 23, Dining Room							
92	HA23-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 24, Living Room							
93	HA23-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 25, Living Room							
94	HA24-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 19, Hallway							
95	HA24-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 20, Living Room							
96	HA24-C		0.239	31.0	36.6	32.4	NA	NAD
	Location: White Interior Caulk; Unit 21, Dining Room							

See Reporting notes on last page



Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
97	HA25-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 19, Bathroom							
98	HA25-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 20, Bathroom							
99	HA25-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 21, 2nd Floor Bath							
100	HA26-A		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 19, Utility							
101	HA26-B		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 21, Utility							
102	HA26-C		0.785	41.7	32.8	25.5	NA	NAD
	Location: White Hvac Duct Mastic; Unit 22, Utility							
103	HA27-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building C, Exterior Front							
104	HA27-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building C, Exterior Front							
105	HA27-C		0.612	72.1	22.1	5.7	NA	NAD
	Location: Black Window Caulk; Building C, Exterior Front							
106	HA28-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building C, Exterior Front							
107	HA28-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building C, Exterior Front							
108	HA28-C		0.295	35.8	53.1	11.1	NA	NAD
	Location: White Door Caulk; Building C, Exterior Front							
109	HA29-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building C, Exterior Front							
110	HA29-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building C, Exterior Front							
111	HA29-C		0.535	29.4	44.3	26.3	NA	NAD
	Location: Black Roof Shingle; Building C, Exterior Front							
112	HA30-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building C, Exterior Front							

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Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
113	HA30-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building C, Exterior Front							
114	HA30-C		0.199	95.5	2.2	2.4	NA	NAD
	Location: Black Roof Felt; Building C, Exterior Front							
115	HA31-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 27, Utility							
116	HA31-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 28, Hall Closet							
117	HA31-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 29, Living Room							
118	HA32-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 27, Kitchen							
119	HA32-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 28, Dining Room							
120	HA32-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 29, Kitchen							
121	HA32-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 30, Kitchen							
122	HA32-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 31, Kitchen							
123	HA32-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 32, Kitchen							
124	HA32-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 33, Kitchen							
125	HA33-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 27, Kitchen							
126	HA33-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 28, Kitchen							
127	HA33-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 29, Dining Room							
128	HA33-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 30, Living Room							

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Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
129	HA33-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 31, Dining Room							
130	HA33-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 32, Kitchen							
131	HA33-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 33, Kitchen							
132	HA34-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 27, Bathroom							
133	HA34-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 28, Dining Room							
134	HA34-C		0.170	31.3	51.2	17.5	NA	NAD
	Location: White Interior Caulk; Unit 29, Living Room							
135	HA35-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 27, Bathroom							
136	HA35-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 28, Bathroom							
137	HA35-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 29, Bathroom							
138	HA36-A		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 27, Utility Closet							
139	HA36-B		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 29, Utility Closet							
140	HA36-C		0.286	27.6	70.1	2.3	NA	NAD
	Location: White Hvac Duct Mastic; Unit 30, Utility Closet							
141	HA37-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building D, Exterior Front							
142	HA37-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building D, Exterior Front							
143	HA37-C		0.486	71.3	22.0	6.6	NA	NAD
	Location: Black Window Caulk; Building D, Exterior Front							
144	HA38-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building D, Exterior Front							

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Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
145	HA38-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building D, Exterior Front							
146	HA38-C		0.390	29.8	59.4	10.8	NA	NAD
	Location: White Door Caulk; Building D, Exterior Front							
147	HA39-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building D, Exterior Front							
148	HA39-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building D, Exterior Front							
149	HA39-C		0.553	20.3	57.4	22.2	NA	NAD
	Location: Black Roof Shingle; Building D, Exterior Front							
150	HA40-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building D, Exterior Front							
151	HA40-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building D, Exterior Front							
152	HA40-C		0.241	93.2	2.1	4.7	NA	NAD
	Location: Black Roof Felt; Building D, Exterior Front							
153	HA41-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 35, Hall Closet							
154	HA41-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 36, Hall Closet							
155	HA41-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 37, Utility Closet							
156	HA42-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 35, Living Room							
157	HA42-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 35, Hallway							
158	HA42-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 26, Kitchen							
159	HA42-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 37, Utility Closet							
160	HA42-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 38, Living Room							

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Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
161	HA42-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Office, Kitchen							
162	HA42-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Office, Storage Room							
163	HA43-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 35, Living Room							
164	HA43-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 35, Hallway							
165	HA43-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 36, Dining Room							
166	HA43-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 37, Living Room							
167	HA43-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 38, Living Room							
168	HA43-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Office, Kitchen							
169	HA43-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Office, Hallway							
170	HA44-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 35, Dining Room							
171	HA44-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 36, Dining Room							
172	HA44-C		0.176	33.3	18.9	47.8	NA	NAD
	Location: White Interior Caulk; Unit 37, Living Room							
173	HA45-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 35, Bathroom							
174	HA45-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 36, Bathroom							
175	HA45-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 37, Bathroom							
176	HA46-A		----	----	----	----	NAD	NA
	Location: Gray Hvac Duct Mastic; Unit 35, Utility Closet							

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Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
177	HA46-B		----	----	----	----	NAD	NA
	Location: Gray Hvac Duct Mastic; Unit 36, Utility Closet							
178	HA46-C		0.567	37.5	59.9	2.6	NA	NAD
	Location: Gray Hvac Duct Mastic; Unit 37, Utility Closet							
179L1	HA47-A		----	----	----	----	NAD	NA
	Location: Gray Cove Base; Office, Kitchen							
179L2	HA47-A		----	----	----	----	NAD	NA
	Location: Gray Cove Base; Office, Kitchen							
180L1	HA47-B		----	----	----	----	NAD	NA
	Location: Gray Cove Base; Office, Kitchen							
180L2	HA47-B		----	----	----	----	NAD	NA
	Location: Gray Cove Base; Office, Kitchen							
181L1	HA47-C		0.210	43.6	55.6	0.8	NA	NAD
	Location: Gray Cove Base; Office, Kitchen							
181L2	HA47-C		0.395	24.1	65.1	10.8	NA	NAD
	Location: Gray Cove Base; Office, Kitchen							
182L1	HA48-A		----	----	----	----	NAD	NA
	Location: Brown Cove Base; Office, Storage Room							
182L2	HA48-A		----	----	----	----	NAD	NA
	Location: Brown Cove Base; Office, Storage Room							
183L1	HA48-B		----	----	----	----	NAD	NA
	Location: Brown Cove Base; Office, Storage Room							
183L2	HA48-B		----	----	----	----	NAD	NA
	Location: Brown Cove Base; Office, Storage Room							
184L1	HA48-C		0.550	15.1	83.4	1.6	NA	NAD
	Location: Brown Cove Base; Office, Storage Room							
184L2	HA48-C		----	----	----	----	NA	NA
	Location: Brown Cove Base; Office, Storage Room Insufficient Material Submitted For Preparation							
185	HA49-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building E, Exterior Front							
186	HA49-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building E, Exterior Front							

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**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
187	HA49-C		0.481	72.3	22.5	5.2	NA	NAD
	Location: Black Window Caulk; Building E, Exterior Front							
188	HA50-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building E, Exterior Front							
189	HA50-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building E, Exterior Front							
190	HA50-C		0.354	36.0	52.3	11.7	NA	NAD
	Location: White Door Caulk; Building E, Exterior Front							
191	HA51-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building E, Exterior Front							
192	HA51-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building E, Exterior Front							
193	HA51-C		0.458	21.7	47.6	30.7	NA	NAD
	Location: Black Roof Shingle; Building E, Exterior Front							
194	HA52-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building E, Exterior Front							
195	HA52-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building E, Exterior Front							
196	HA52-C		0.169	95.0	5.0	0.0	NA	NAD
	Location: Black Roof Felt; Building E, Exterior Front							
197	HA53-A		----	----	----	----	NAD	NA
	Location: Drywall; Unit 39, Hallway							
198	HA53-B		----	----	----	----	NAD	NA
	Location: Drywall; Unit 40, Living Room							
199	HA53-C		----	----	----	----	NAD	NA
	Location: Drywall; Unit 41, Living Room							
200	HA54-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 39, Kitchen							
201	HA54-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 40, Living Room							
202	HA54-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 41, Living Room							

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**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
203	HA54-D		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 42, Kitchen							
204	HA54-E		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 43, Living Room							
205	HA54-F		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 44, Living Room							
206	HA54-G		----	----	----	----	NAD	NA
	Location: Joint Compound; Unit 45, Kitchen							
207	HA55-A		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 39, Hallway							
208	HA55-B		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 40, Living Room							
209	HA55-C		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 41, Living Room							
210	HA55-D		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 42, Kitchen							
211	HA55-E		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 43, Living Room							
212	HA55-F		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 44, Living Room							
213	HA55-G		----	----	----	----	NAD	NA
	Location: White Ceiling Texture; Unit 45, Living Room							
214	HA56-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 39, Dining Room							
215	HA56-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Unit 40, Living Room							
216	HA56-C		0.307	30.5	54.8	14.7	NA	NAD
	Location: White Interior Caulk; Unit 41, Dining Room							
217	HA57-A		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 39, Bathroom							
218	HA57-B		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 40, Bathroom							

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**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
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AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
219	HA57-C		----	----	----	----	NAD	NA
	Location: White Grout Ass. W/ 4x4 White Wall Tile; Unit 41, 2Nd Floor Bath							
220	HA58-A		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 39, Utility Closet							
221	HA58-B		----	----	----	----	NAD	NA
	Location: White Hvac Duct Mastic; Unit 40, Utility Closet							
222	HA58-C		0.441	28.1	70.2	1.7	NA	NAD
	Location: White Hvac Duct Mastic; Unit 41, Utility Closet							
223	HA59-A		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building F, Exterior Front							
224	HA59-B		----	----	----	----	NAD	NA
	Location: Black Window Caulk; Building F, Exterior Front							
225	HA59-C		0.232	36.5	54.8	8.7	NA	NAD
	Location: Black Window Caulk; Building F, Exterior Front							
226	HA60-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building F, Exterior Front							
227	HA60-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Building F, Exterior Front							
228	HA60-C		0.605	69.6	23.1	7.2	NA	NAD
	Location: White Door Caulk; Building F, Exterior Front							
229	HA61-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building F, Exterior Front							
230	HA61-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Building F, Exterior Front							
231	HA61-C		0.568	22.8	50.1	27.0	NA	NAD
	Location: Black Roof Shingle; Building F, Exterior Front							
232	HA62-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building F, Exterior Front							
233	HA62-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Building F, Exterior Front							
234	HA62-C		0.250	90.7	2.3	7.0	NA	NAD
	Location: Black Roof Felt; Building F, Exterior Front							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
235	HA63-A		----	----	----	----	NAD	NA
	Location: Drywall; Maintenance, Hallway							
236	HA63-B		----	----	----	----	NAD	NA
	Location: Drywall; Maintenance, Hallway							
237	HA63-C		----	----	----	----	NAD	NA
	Location: Drywall; Maintenance, Left Central Office							
238	HA64-A		----	----	----	----	NAD	NA
	Location: Joint Compound; Maintenance, Hallway							
239	HA64-B		----	----	----	----	NAD	NA
	Location: Joint Compound; Maintenance, Hallway							
240	HA64-C		----	----	----	----	NAD	NA
	Location: Joint Compound; Maintenance, Left Central Office							
241L1	HA65-A		----	----	----	----	NAD	NA
	Location: Beige Cove Base; Maintenance, Left Central Office							
241L2	HA65-A		----	----	----	----	NAD	NA
	Location: Beige Cove Base; Maintenance, Left Central Office							
242L1	HA65-B		----	----	----	----	NAD	NA
	Location: Beige Cove Base; Maintenance, Hallway							
242L2	HA65-B		----	----	----	----	NAD	NA
	Location: Beige Cove Base; Maintenance, Hallway							
243L1	HA65-C		0.276	30.2	60.6	9.2	NA	NAD
	Location: Beige Cove Base; Maintenance, Hallway							
243L2	HA65-C		----	----	----	----	NA	NA
	Location: Beige Cove Base; Maintenance, Hallway Insufficient Material Submitted For Preparation							
244	HA66-A		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Maintenance, Hallway							
245	HA66-B		----	----	----	----	NAD	NA
	Location: White Interior Caulk; Maintenance, Hallway							
246	HA66-C		0.193	36.9	48.5	14.6	NA	NAD
	Location: White Interior Caulk; Maintenance, Hallway							
247	HA67-A		----	----	----	----	NAD	NA
	Location: White Door Caulk; Maintenance, Exterior, Front							

See Reporting notes on last page

Client Name: Dominion Due Diligence Group

**Table I**  
**Summary of Bulk Asbestos Analysis Results**  
 2024-1708; Northgate Manor; 220 Biblebrook Drive - Greer, SC

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
248	HA67-B		----	----	----	----	NAD	NA
	Location: White Door Caulk; Maintenance, Exterior, Front							
249	HA67-C		0.286	37.1	52.9	10.0	NA	NAD
	Location: White Door Caulk; Maintenance, Exterior, Rear							
250	HA68-A		----	----	----	----	NAD	NA
	Location: White Window Caulk; Maintenance, Exterior, Front							
251	HA68-B		----	----	----	----	NAD	NA
	Location: White Window Caulk; Maintenance, Exterior Front							
252	HA68-C		0.177	35.5	52.1	12.5	NA	NAD
	Location: White Window Caulk; Maintenance, Exterior Front							
253	HA69-A		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Maintenance, Exterior Front							
254	HA69-B		----	----	----	----	NAD	NA
	Location: Black Roof Shingle; Maintenance, Exterior Front							
255	HA69-C		0.714	22.1	40.3	37.6	NA	NAD
	Location: Black Roof Shingle; Maintenance, Exterior Front							
256	HA70-A		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Maintenance, Exterior Front							
257	HA70-B		----	----	----	----	NAD	NA
	Location: Black Roof Felt; Maintenance, Exterior Front							
258	HA70-C		0.249	67.1	26.0	6.9	NA	NAD
	Location: Black Roof Felt; Maintenance, Exterior Front							

Analyzed by: Cory M. Parnell

Date: 10/14/2024

Reviewed by: Cory M. Parnell

Semi-Quantitative Analysis: NAD = no asbestos detected; NA = not analyzed; NA/PS = not analyzed due to positive stop; Trace = <1%; PLM analysis by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) or NY ELAP 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NY ELAP Lab # 10984); TEM prep by EPA 600/R-93/116 Section 2.3 (analysis by Section 2.5, not covered by NVLAP Bulk accreditation); or NY ELAP 198.4 for New York NOB samples (NY ELAP Lab # 10984). Analysis using Jeol, Model JEM-100CX II microscope, Serial #156147-247. \*\* Warning Notes: Consider PLM fiber diameter limitation, only TEM will resolve fibers <0.25 micrometers in diameter. TEM bulk analysis is representative of the fine grained matrix material and may not be representative of non-uniformly dispersed debris, soils or other heterogeneous materials for which a combination PLM/TEM evaluation is recommended; Quantitation for beginning weights of <0.1 grams should be considered as qualitative only.

# ASBESTOS-CONTAINING MATERIALS SURVEY

**SITE:** Northgate Manor  
**ADDRESS:** 220 Biblebrook Drive-- Greer, SC  
**DATE:** 10/7/24, 10/8/24  
**CLIENT:**

**PERSONNEL :** Tim Quint  
**PROJECT #:** 2024-1708  
**LABORATORY:** AmeriSci  
**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

HOMOGENOUS AREA	SAMPLE #	MATERIAL DESCRIPTION	LOCATION	QUANTITY/ FRIABILITY
01	HA01-A	Drywall	Unit 1, living room	Non-friable
01	HA01-B	Drywall	Unit 2, kitchen	Non-friable
01	HA01-C	Drywall	Unit 3, kitchen	Non-friable
02	HA02-A	Joint Compound	Unit 1, living room	Non-friable
02	HA02-B	Joint Compound	Unit 2, living room	Non-friable
02	HA02-C	Joint Compound	Unit 3, kitchen	Non-friable
02	HA02-D	Joint Compound	Unit 4, living room	Non-friable
02	HA02-E	Joint Compound	Unit 5, kitchen	Non-friable
02	HA02-F	Joint Compound	Unit 6, living room	Non-friable
02	HA02-G	Joint Compound	Unit 7, living room	Non-friable
03	HA03-A	White ceiling texture	Unit 1, living room	Non-friable
03	HA03-B	White ceiling texture	Unit 2, living room	Non-friable
03	HA03-C	White ceiling texture	Unit 3, kitchen	Non-friable
03	HA03-D	White ceiling texture	Unit 4, living room	Non-friable
03	HA03-E	White ceiling texture	Unit 5, kitchen	Non-friable
03	HA03-F	White ceiling texture	Unit 6, living room	Non-friable
03	HA03-G	White ceiling texture	Unit 7, living room	Non-friable
04	HA04-A	White interior caulk	Unit 1, living room	Non-friable
04	HA04-B	White interior caulk	Unit 2, living room	Non-friable
04	HA04-C	White interior caulk	Unit 3, kitchen	Non-friable
05	HA05-A	White grout ass. w/ 4"x4" white wall tile	Unit 1, bathroom	Non-friable
05	HA05-B	White grout ass. w/ 4"x4" white wall tile	Unit 2, bathroom	Non-friable
05	HA05-C	White grout ass. w/ 4"x4" white wall tile	Unit 4, bathroom	Non-friable
06	HA06-A	Gray HVAC duct mastic	Unit 1, utility closet	Non-friable
06	HA06-B	Gray HVAC duct mastic	Unit 2, utility closet	Non-friable
06	HA06-C	Gray HVAC duct mastic	Unit 3, utility closet	Non-friable

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# ASBESTOS-CONTAINING MATERIALS SURVEY

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PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

07	HA07-A	Black window caulk	Building A, exterior, front	Non-friable
07	HA07-B	Black window caulk	Building A, exterior, front	Non-friable
07	HA07-C	Black window caulk	Building A, exterior, front	Non-friable
08	HA08-A	White door caulk	Building A, exterior, front	Non-friable
08	HA08-B	White door caulk	Building A, exterior, front	Non-friable
08	HA08-C	White door caulk	Building A, exterior, front	Non-friable
09	HA09-A	Black roof shingle	Building A, exterior, front	Non-friable
09	HA09-B	Black roof shingle	Building A, exterior, front	Non-friable
09	HA09-C	Black roof shingle	Building A, exterior, front	Non-friable
10	HA10-A	Black roof felt	Building A, exterior, front	Non-friable
10	HA10-B	Black roof felt	Building A, exterior, front	Non-friable
10	HA10-C	Black roof felt	Building A, exterior, front	Non-friable
11	HA11-A	Drywall	Unit 11, Kitchen	Non-friable
11	HA11-B	Drywall	Unit 12, utility closet	Non-friable
11	HA11-C	Drywall	Unit 13, utility closet	Non-friable
12	HA12-A	Joint Compound	Unit 11, Kitchen	Non-friable
12	HA12-B	Joint Compound	Unit 12, dining room	Non-friable
12	HA12-C	Joint Compound	Unit 13, living room	Non-friable
12	HA12-D	Joint Compound	Unit 14, living room	Non-friable
12	HA12-E	Joint Compound	Unit 15, living room	Non-friable
12	HA12-F	Joint Compound	Unit 16, living room	Non-friable
12	HA12-G	Joint Compound	Unit 17, dining room	Non-friable
13	HA13-A	White ceiling texture	Unit 11, hallway	Non-friable
13	HA13-B	White ceiling texture	Unit 12, dining room	Non-friable
13	HA13-C	White ceiling texture	Unit 13, living room	Non-friable

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PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

13	HA13-D	White ceiling texture	Unit 14, living room	Non-friable
13	HA13-E	White ceiling texture	Unit 15, living room	Non-friable
13	HA13-F	White ceiling texture	Unit 16, living room	Non-friable
13	HA13-G	White ceiling texture	Unit 17, dining room	Non-friable
14	HA14-A	White interior caulk	Unit 11, dining room	Non-friable
14	HA14-B	White interior caulk	Unit 12, dining room	Non-friable
14	HA14-C	White interior caulk	Unit 13, living room	Non-friable
15	HA15-A	White grout ass. w/ 4"x4" white wall tile	Unit 13, 2 <sup>nd</sup> floor bath	Non-friable
15	HA15-B	White grout ass. w/ 4"x4" white wall tile	Unit 16, 2 <sup>nd</sup> floor bath	Non-friable
15	HA15-C	White grout ass. w/ 4"x4" white wall tile	Unit 18, bathroom	Non-friable
16	HA16-A	White HVAC duct mastic	Unit 11, utility closet	Non-friable
16	HA16-B	White HVAC duct mastic	Unit 12, utility closet	Non-friable
16	HA16-C	White HVAC duct mastic	Unit 13, utility closet	Non-friable
17	HA17-A	Black window caulk	Building B, Exterior front	Non-friable
17	HA17-B	Black window caulk	Building B, Exterior front	Non-friable
17	HA17-C	Black window caulk	Building B, Exterior front	Non-friable
18	HA18-A	White door caulk	Building B, Exterior front	Non-friable
18	HA18-B	White door caulk	Building B, Exterior front	Non-friable
18	HA18-C	White door caulk	Building B, Exterior front	Non-friable
19	HA19-A	Black roof shingle	Building B, Exterior front	Non-friable
19	HA19-B	Black roof shingle	Building B, Exterior front	Non-friable
19	HA19-C	Black roof shingle	Building B, Exterior front	Non-friable
20	HA20-A	Black roof felt	Building B, Exterior front	Non-friable
20	HA20-B	Black roof felt	Building B, Exterior front	Non-friable
20	HA20-C	Black roof felt	Building B, Exterior front	Non-friable

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**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

21	HA21-A	Drywall	Unit 19, hall closet	Non-friable
21	HA21-B	Drywall	Unit 20, hall closet	Non-friable
21	HA21-C	Drywall	Unit 21, kitchen	Non-friable
22	HA22-A	Joint Compound	Unit 19, hallway	Non-friable
22	HA22-B	Joint Compound	Unit 20, living room	Non-friable
22	HA22-C	Joint Compound	Unit 21, dining room	Non-friable
22	HA22-D	Joint Compound	Unit 22, kitchen	Non-friable
22	HA22-E	Joint Compound	Unit 23, dining room	Non-friable
22	HA22-F	Joint Compound	Unit 24, living room	Non-friable
22	HA22-G	Joint Compound	Unit 25, hallway	Non-friable
23	HA23-A	White ceiling texture	Unit 19, hallway	Non-friable
23	HA23-B	White ceiling texture	Unit 20, living room	Non-friable
23	HA23-C	White ceiling texture	Unit 21, dining room	Non-friable
23	HA23-D	White ceiling texture	Unit 22, kitchen	Non-friable
23	HA23-E	White ceiling texture	Unit 23, dining room	Non-friable
23	HA23-F	White ceiling texture	Unit 24, living room	Non-friable
23	HA23-G	White ceiling texture	Unit 25, living room	Non-friable
24	HA24-A	White interior caulk	Unit 19, hallway	Non-friable
24	HA24-B	White interior caulk	Unit 20, living room	Non-friable
24	HA24-C	White interior caulk	Unit 21, dining room	Non-friable
25	HA25-A	White grout ass. w/ 4"x4" white wall tile	Unit 19, bathroom	Non-friable
25	HA25-B	White grout ass. w/ 4"x4" white wall tile	Unit 20, bathroom	Non-friable
25	HA25-C	White grout ass. w/ 4"x4" white wall tile	Unit 21, 2 <sup>nd</sup> floor bath	Non-friable
26	HA26-A	White HVAC duct mastic	Unit 19, utility	Non-friable
26	HA26-B	White HVAC duct mastic	Unit 21, utility	Non-friable
26	HA26-C	White HVAC duct mastic	Unit 22, utility	Non-friable
27	HA27-A	Black window caulk	Building C, exterior front	Non-friable Received

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# ASBESTOS-CONTAINING MATERIALS SURVEY

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**LABORATORY:** AmeriSci  
**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

27	HA27-B	Black window caulk	Building C, exterior front	Non-friable
27	HA27-C	Black window caulk	Building C, exterior front	Non-friable
28	HA28-A	White door caulk	Building C, exterior front	Non-friable
28	HA28-B	White door caulk	Building C, exterior front	Non-friable
28	HA28-C	White door caulk	Building C, exterior front	Non-friable
29	HA29-A	Black roof shingle	Building C, exterior front	Non-friable
29	HA29-B	Black roof shingle	Building C, exterior front	Non-friable
29	HA29-C	Black roof shingle	Building C, exterior front	Non-friable
30	HA30-A	Black roof felt	Building C, exterior front	Non-friable
30	HA30-B	Black roof felt	Building C, exterior front	Non-friable
30	HA30-C	Black roof felt	Building C, exterior front	Non-friable
31	HA31-A	Drywall	Unit 27, utility	Non-friable
31	HA31-B	Drywall	Unit 28, hall closet	Non-friable
31	HA31-C	Drywall	Unit 29, living room	Non-friable
32	HA32-A	Joint Compound	Unit 27, kitchen	Non-friable
32	HA32-B	Joint Compound	Unit 28, dining room	Non-friable
32	HA32-C	Joint Compound	Unit 29, kitchen	Non-friable
32	HA32-D	Joint Compound	Unit 30, kitchen	Non-friable
32	HA32-E	Joint Compound	Unit 31, kitchen	Non-friable
32	HA32-F	Joint Compound	Unit 32, kitchen	Non-friable
32	HA32-G	Joint Compound	Unit 33, kitchen	Non-friable
33	HA33-A	White ceiling texture	Unit 27, kitchen	Non-friable
33	HA33-B	White ceiling texture	Unit 28, kitchen	Non-friable
33	HA33-C	White ceiling texture	Unit 29, dining room	Non-friable
33	HA33-D	White ceiling texture	Unit 30, living room	Non-friable

OCT 09 2024  
*Tom*



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**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

33	HA33-E	White ceiling texture	Unit 31, dining room	Non-friable
33	HA33-F	White ceiling texture	Unit 32, kitchen	Non-friable
33	HA33-G	White ceiling texture	Unit 33, kitchen	Non-friable
34	HA34-A	White interior caulk	Unit 27, bathroom	Non-friable
34	HA34-B	White interior caulk	Unit 28, dining room	Non-friable
34	HA34-C	White interior caulk	Unit 29, living room	Non-friable
35	HA35-A	White grout ass. w/ 4"x4" white wall tile	Unit 27, bathroom	Non-friable
35	HA35-B	White grout ass. w/ 4"x4" white wall tile	Unit 28, bathroom	Non-friable
35	HA35-C	White grout ass. w/ 4"x4" white wall tile	Unit 29, bathroom	Non-friable
36	HA36-A	White HVAC duct mastic	Unit 27, utility closet	Non-friable
36	HA36-B	White HVAC duct mastic	Unit 29, utility closet	Non-friable
36	HA36-C	White HVAC duct mastic	Unit 30, utility closet	Non-friable
37	HA37-A	Black window caulk	Building D, exterior front	Non-friable
37	HA37-B	Black window caulk	Building D, exterior front	Non-friable
37	HA37-C	Black window caulk	Building D, exterior front	Non-friable
38	HA38-A	White door caulk	Building D, exterior front	Non-friable
38	HA38-B	White door caulk	Building D, exterior front	Non-friable
38	HA38-C	White door caulk	Building D, exterior front	Non-friable
39	HA39-A	Black roof shingle	Building D, exterior front	Non-friable
39	HA39-B	Black roof shingle	Building D, exterior front	Non-friable
39	HA39-C	Black roof shingle	Building D, exterior front	Non-friable
40	HA40-A	Black roof felt	Building D, exterior front	Non-friable
40	HA40-B	Black roof felt	Building D, exterior front	Non-friable
40	HA40-C	Black roof felt	Building D, exterior front	Non-friable
41	HA41-A	Drywall	Unit 35, hall closet	Non-friable

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PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

41	HA41-B	Drywall	Unit 36, hall closet	Non-friable
41	HA41-C	Drywall	Unit 37, utility closet	Non-friable
42	HA42-A	Joint Compound	Unit 35, living room	Non-friable
42	HA42-B	Joint Compound	Unit 35, hallway	Non-friable
42	HA42-C	Joint Compound	Unit 26, kitchen	Non-friable
42	HA42-D	Joint Compound	Unit 37, utility closet	Non-friable
42	HA42-E	Joint Compound	Unit 38, living room	Non-friable
42	HA42-F	Joint Compound	Office, kitchen	Non-friable
42	HA42-G	Joint Compound	Office, storage room	Non-friable
43	HA43-A	White ceiling texture	Unit 35, living room	Non-friable
43	HA43-B	White ceiling texture	Unit 35, hallway	Non-friable
43	HA43-C	White ceiling texture	Unit 36, dining room	Non-friable
43	HA43-D	White ceiling texture	Unit 37, living room	Non-friable
43	HA43-E	White ceiling texture	Unit 38, living room	Non-friable
43	HA43-F	White ceiling texture	Office, kitchen	Non-friable
43	HA43-G	White ceiling texture	Office, hallway	Non-friable
44	HA44-A	White interior caulk	Unit 35, dining room	Non-friable
44	HA44-B	White interior caulk	Unit 36, dining room	Non-friable
44	HA44-C	White interior caulk	Unit 37, living room	Non-friable
45	HA45-A	White grout ass. w/ 4"x4" white wall tile	Unit 35, bathroom	Non-friable
45	HA45-B	White grout ass. w/ 4"x4" white wall tile	Unit 36, bathroom	Non-friable
45	HA45-C	White grout ass. w/ 4"x4" white wall tile	Unit 37, bathroom	Non-friable
46	HA46-A	Gray HVAC duct mastic	Unit 35, utility closet	Non-friable
46	HA46-B	Gray HVAC duct mastic	Unit 36, utility closet	Non-friable
46	HA46-C	Gray HVAC duct mastic	Unit 37, utility closet	Non-friable
47	HA47-A	Gray cove base	Office, kitchen	Non-friable
47	HA47-B	Gray cove base	Office, kitchen	Non-friable

Received

OCT 09 2024  
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PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup>

sample  
**124101364**

47	HA47-C	Gray cove base	Office, kitchen	Non-friable
48	HA48-A	Brown cove base	Office, storage room	Non-friable
48	HA48-B	Brown cove base	Office, storage room	Non-friable
48	HA48-C	Brown cove base	Office, storage room	Non-friable
49	HA49-A	Black window caulk	Building E, exterior front	Non-friable
49	HA49-B	Black window caulk	Building E, exterior front	Non-friable
49	HA49-C	Black window caulk	Building E, exterior front	Non-friable
50	HA50-A	White door caulk	Building E, exterior front	Non-friable
50	HA50-B	White door caulk	Building E, exterior front	Non-friable
50	HA50-C	White door caulk	Building E, exterior front	Non-friable
51	HA51-A	Black roof shingle	Building E, exterior front	Non-friable
51	HA51-B	Black roof shingle	Building E, exterior front	Non-friable
51	HA51-C	Black roof shingle	Building E, exterior front	Non-friable
52	HA52-A	Black roof felt	Building E, exterior front	Non-friable
52	HA52-B	Black roof felt	Building E, exterior front	Non-friable
52	HA52-C	Black roof felt	Building E, exterior front	Non-friable
53	HA53-A	Drywall	Unit 39, hallway	Non-friable
53	HA53-B	Drywall	Unit 40, living room	Non-friable
53	HA53-C	Drywall	Unit 41, living room	Non-friable
54	HA54-A	Joint Compound	Unit 39, kitchen	Non-friable
54	HA54-B	Joint Compound	Unit 40, living room	Non-friable
54	HA54-C	Joint Compound	Unit 41, living room	Non-friable
54	HA54-D	Joint Compound	Unit 42, kitchen	Non-friable
54	HA54-E	Joint Compound	Unit 43, living room	Non-friable
54	HA54-F	Joint Compound	Unit 44, living room	Non-friable

Received

OCT 09 2024

# ASBESTOS-CONTAINING MATERIALS SURVEY

**SITE:** Northgate Manor  
**ADDRESS:** 220 Biblebrook Drive- Greer, SC  
**DATE:** 10/7/24, 10/8/24  
**CLIENT:**

**PERSONNEL:** Tim Quint  
**PROJECT #:** 2024-1708  
**LABORATORY:** AmeriSci  
**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

54	HA54-G	Joint Compound	Unit 45, kitchen	Non-friable
55	HA55-A	White ceiling texture	Unit 39, hallway	Non-friable
55	HA55-B	White ceiling texture	Unit 40, living room	Non-friable
55	HA55-C	White ceiling texture	Unit 41, living room	Non-friable
55	HA55-D	White ceiling texture	Unit 42, kitchen	Non-friable
55	HA55-E	White ceiling texture	Unit 43, living room	Non-friable
55	HA55-F	White ceiling texture	Unit 44, living room	Non-friable
55	HA55-G	White ceiling texture	Unit 45, living room	Non-friable
56	HA56-A	White interior caulk	Unit 39, dining room	Non-friable
56	HA56-B	White interior caulk	Unit 40, living room	Non-friable
56	HA56-C	White interior caulk	Unit 41, dining room	Non-friable
57	HA57-A	White grout ass. w/ 4"x4" white wall tile	Unit 39, bathroom	Non-friable
57	HA57-B	White grout ass. w/ 4"x4" white wall tile	Unit 40, bathroom	Non-friable
57	HA57-C	White grout ass. w/ 4"x4" white wall tile	Unit 41, 2 <sup>nd</sup> floor bath	Non-friable
58	HA58-A	White HVAC duct mastic	Unit 39, utility closet	Non-friable
58	HA58-B	White HVAC duct mastic	Unit 40, utility closet	Non-friable
58	HA58-C	White HVAC duct mastic	Unit 41, utility closet	Non-friable
59	HA59-A	Black window caulk	Building F, exterior front	Non-friable
59	HA59-B	Black window caulk	Building F, exterior front	Non-friable
59	HA59-C	Black window caulk	Building F, exterior front	Non-friable
60	HA60-A	White door caulk	Building F, exterior front	Non-friable
60	HA60-B	White door caulk	Building F, exterior front	Non-friable
60	HA60-C	White door caulk	Building F, exterior front	Non-friable
61	HA61-A	Black roof shingle	Building F, exterior front	Non-friable
61	HA61-B	Black roof shingle	Building F, exterior front	Non-friable

Received

OCT 09 2024

# ASBESTOS-CONTAINING MATERIALS SURVEY

**SITE:** Northgate Manor  
**ADDRESS:** 220 Biblebrook Drive- Greer, SC  
**DATE:** 10/7/24, 10/8/24  
**CLIENT:**

**PERSONNEL :** Tim Quint  
**PROJECT #:** 2024-1708  
**LABORATORY:** AmeriSci  
**TAT:** 3-day

PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

124101364

61	HA61-C	Black roof shingle	Building F, exterior front	Non-friable
62	HA62-A	Black roof felt	Building F, exterior front	Non-friable
62	HA62-B	Black roof felt	Building F, exterior front	Non-friable
62	HA62-C	Black roof felt	Building F, exterior front	Non-friable
63	HA63-A	Drywall	Maintenance, hallway	Non-friable
63	HA63-B	Drywall	Maintenance, hallway	Non-friable
63	HA63-C	Drywall	Maintenance, left central office	Non-friable
64	HA64-A	Joint compound	Maintenance, hallway	Non-friable
64	HA64-B	Joint compound	Maintenance, hallway	Non-friable
64	HA64-C	Joint compound	Maintenance, left central office	Non-friable
65	HA65-A	Beige cove base	Maintenance, left central office	Non-friable
65	HA65-B	Beige cove base	Maintenance, hallway	Non-friable
65	HA65-C	Beige cove base	Maintenance, hallway	Non-friable
66	HA66-A	White interior caulk	Maintenance, hallway	Non-friable
66	HA66-B	White interior caulk	Maintenance, hallway	Non-friable
66	HA66-C	White interior caulk	Maintenance, hallway	Non-friable
67	HA67-A	White door caulk	Maintenance, exterior, front	Non-friable
67	HA67-B	White door caulk	Maintenance, exterior, front	Non-friable
67	HA67-C	White door caulk	Maintenance, exterior, rear	Non-friable
68	HA68-A	White window caulk	Maintenance, exterior, front	Non-friable
68	HA68-B	White window caulk	Maintenance, exterior front	Non-friable
68	HA68-C	White window caulk	Maintenance, exterior front	Non-friable
69	HA69-A	Black roof shingle	Maintenance, exterior front	Non-friable
69	HA69-B	Black roof shingle	Maintenance, exterior front	Non-friable

Received

OCT 09 2024

# ASBESTOS-CONTAINING MATERIALS SURVEY

**SITE:** Northgate Manor  
**ADDRESS:** 220 Biblebrook Drive— Greer, SC  
**DATE:** 10/7/24, 10/8/24  
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**PERSONNEL :** Tim Quint  
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**LABORATORY:** AmeriSci  
**TAT:** 3-day

**TYPE OF ANALYSIS:** PLM, TEM for NOB's - 3<sup>rd</sup> sample

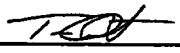
☐ PLEASE ALLOW FOR POSITIVE STOP METHODOLOGY

124101364

69	HA69-C	Black roof shingle	Maintenance, exterior front	Non-friable
70	HA70-A	Black roof felt	Maintenance, exterior front	Non-friable
70	HA70-B	Black roof felt	Maintenance, exterior front	Non-friable
70	HA70-C	Black roof felt	Maintenance, exterior front	Non-friable

**SUBMITTED BY:** TIM QUINT

**DATE SUBMITTED:** 10/8/24

**SIGNATURE:** 

**RECEIVED BY:**

**DATE RECEIVED:**

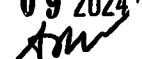
**SIGNATURE:**

## DOMINION DUE DILIGENCE GROUP

201 Wylderose Drive ♦ MIDLOTHIAN ♦ VIRGINIA 23113 ♦ PHONE: (804) 358-2020 ♦ FAX: (804) 358-3003

Received

OCT 09 2024



124101364

Subject: South Carolina samples  
From: Kim Dingledine <k.dingledine@d3g.com>  
Date: 10/2/2024, 2:22 PM  
To: Brian Keith <vareresults@amerisci.com>

I should have South Carolina samples coming today (I think) and then more on Monday/tuesday. We ballparked 300 samples for the Monday/Tuesday ones. Putting on a 48 hour tat so hopefully that is doable. Just want Ed to give you heads up.

Get Outlook for iOS



Kim Dingledine  
(she, her, hers)  
Hazardous Materials Manager  
O: (804) 339-1187  
E: k.dingledine@d3g.com  
A: 201 Wylderose Drive  
Midlothian, Va. 23113  
People, Innovation, Passion, Excellence



This message contains confidential information and is intended only for the intended recipients. If you are not an intended recipient you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

AKW  
10/9/24

## **APPENDIX B**

### **PHOTOGRAPHS**





**Building A**



**Building B**



**Building C**



**Building D**



**Building E**



**Building F**





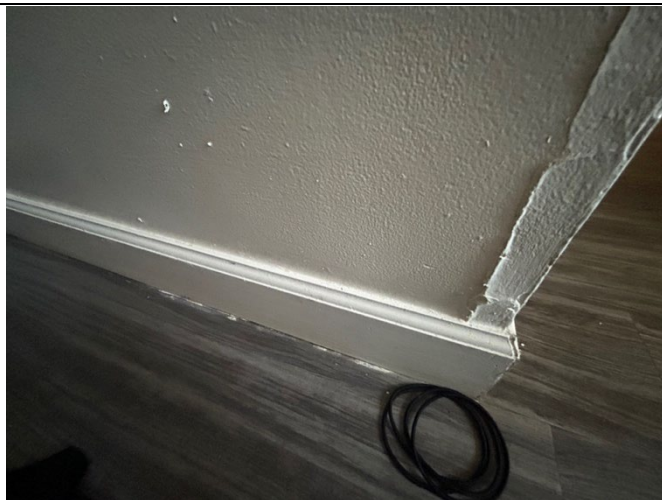
**Maintenance Building**



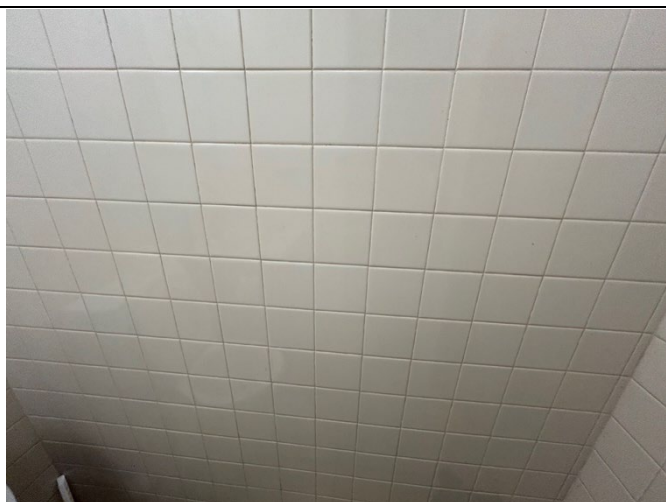
**HA01 & HA02**



**HA03**



**HA04**

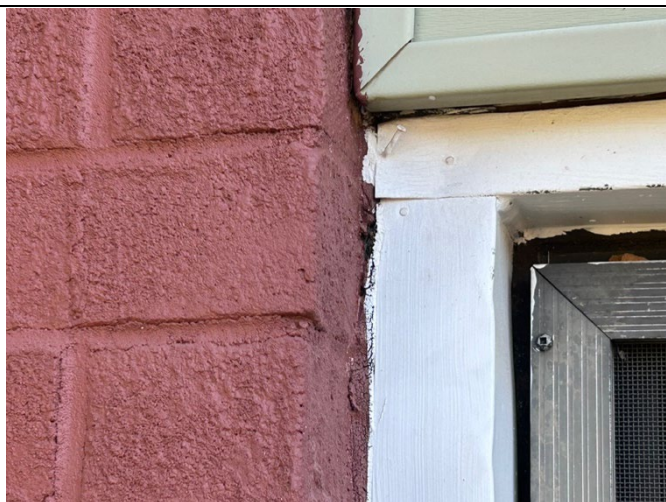


**HA05**

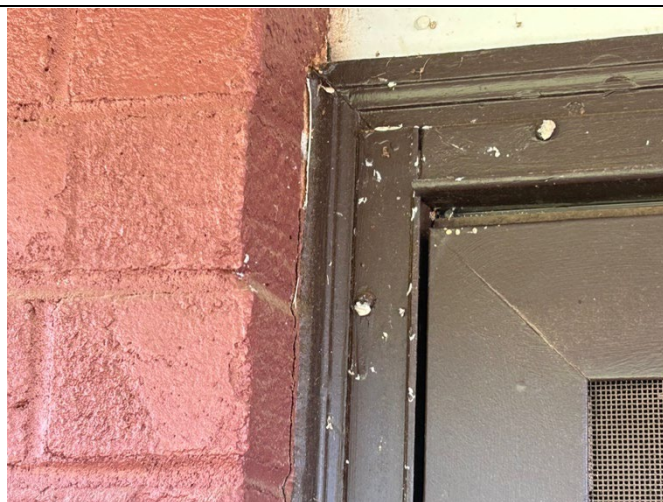


**HA06**





**HA07**



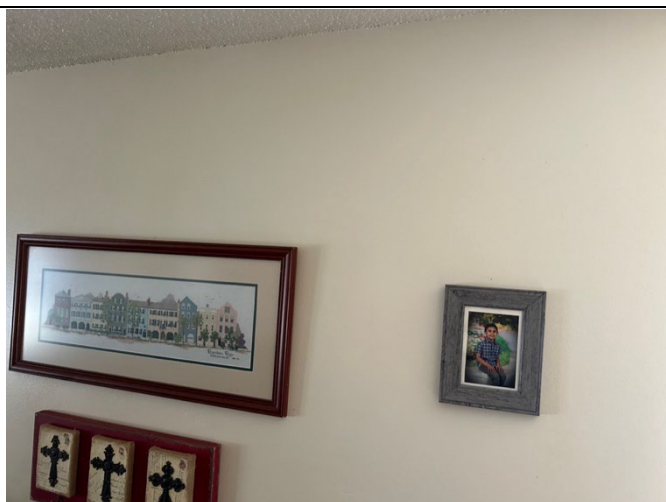
**HA08**



**HA09**



**HA10**



**HA11 & HA12**



**HA13**





**HA14**



**HA15**



**HA16**



**HA17**



**HA18**

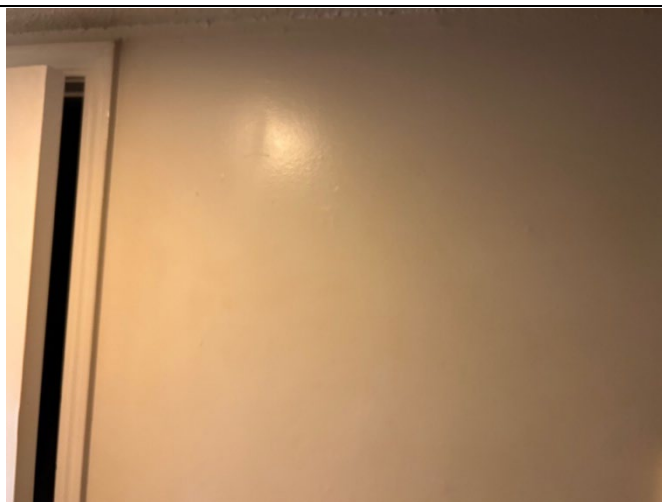


**HA19**





**HA20**



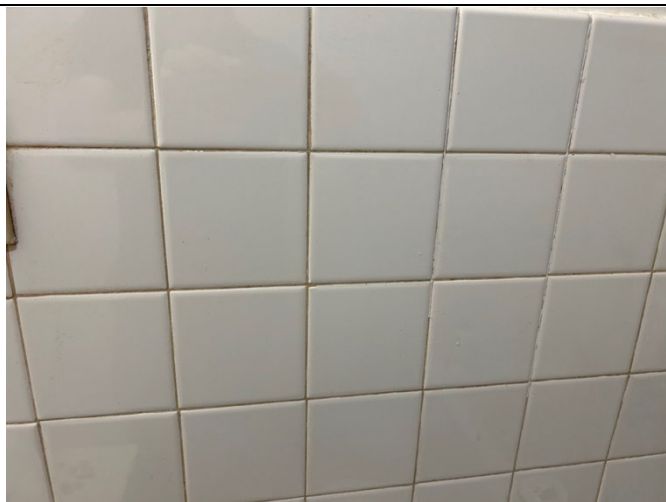
**HA21 & 22**



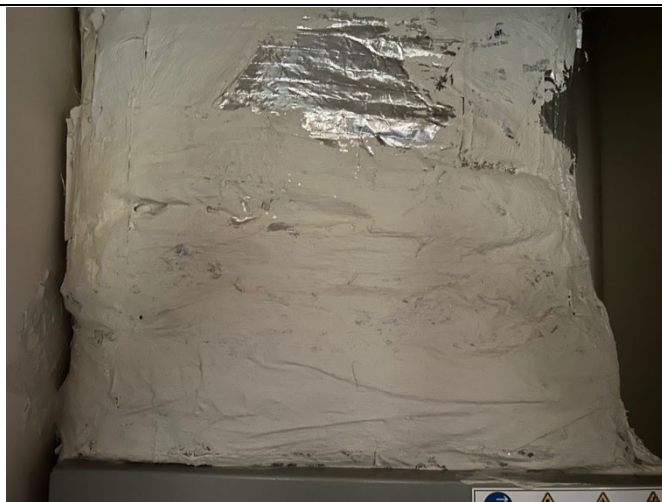
**HA23**



**HA24**



**HA25**



**HA26**





**HA27**



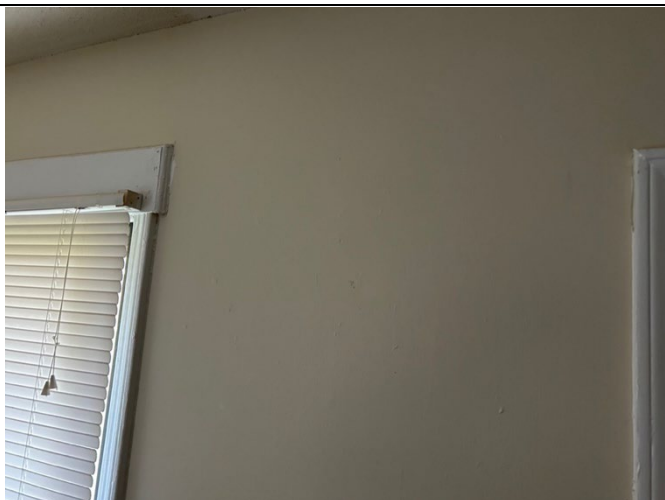
**HA28**



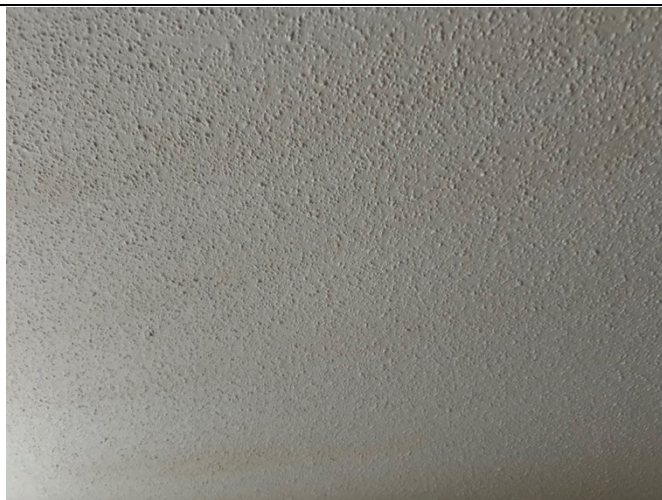
**HA29**



**HA30**



**HA31 & HA32**



**HA33**

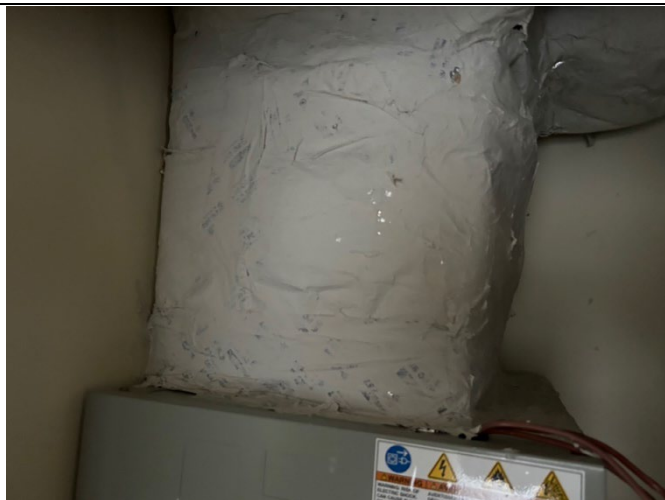




**HA34**



**HA35**



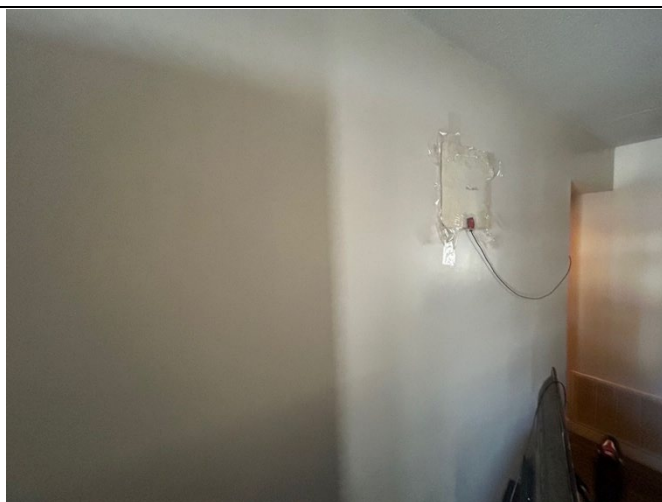
**HA36**



**HA37**



**HA38**



**HA41 AND HA42**





**HA43**



**HA44**



**HA45**



**HA46**

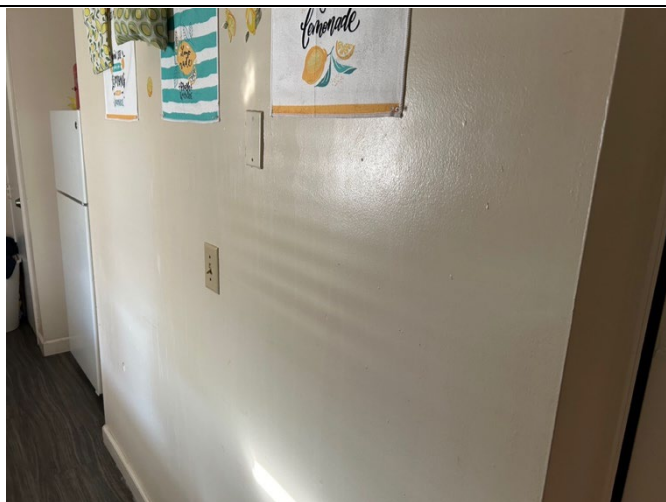


**HA47**

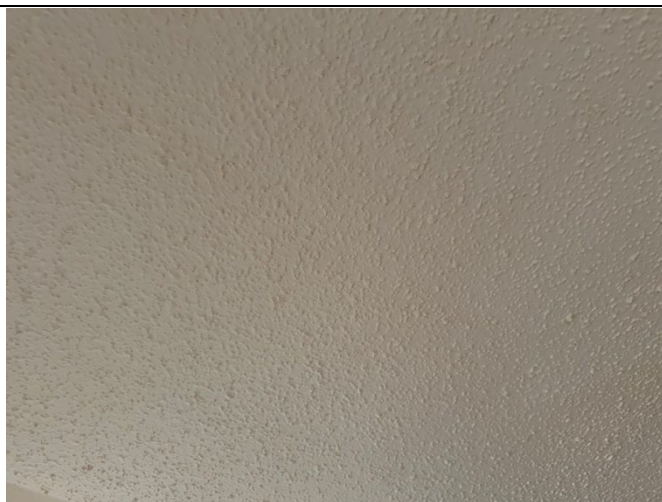


**HA48**





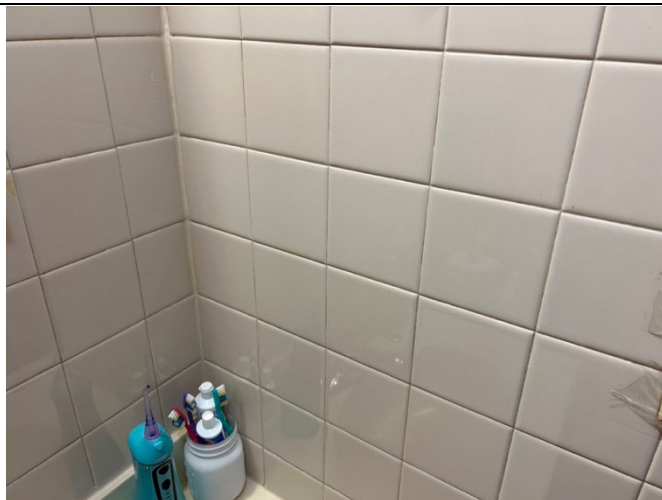
**HA53 & HA54**



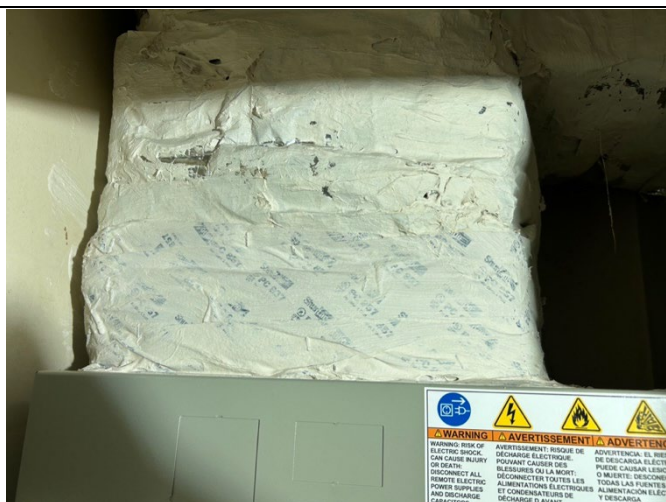
**HA55**



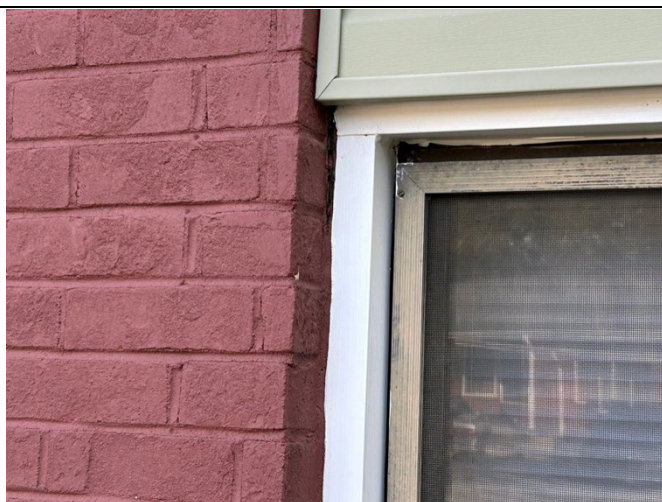
**HA56**



**HA57**



**HA58**



**HA59**





**HA60**



**HA61**



**HA62**



**HA63 & HA64**

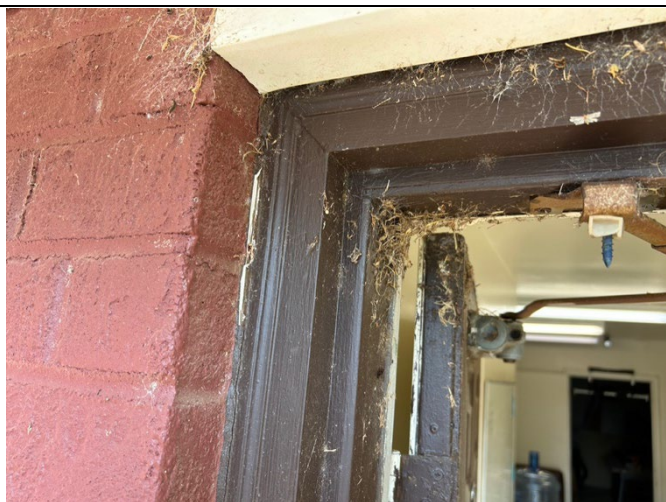


**HA65**



**HA66**





**HA67**



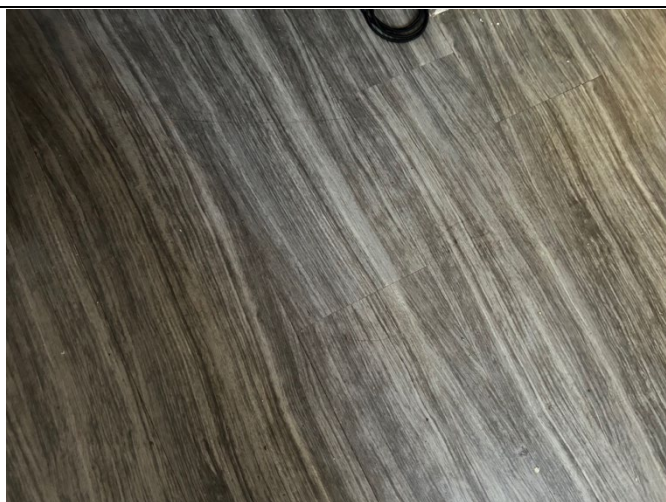
**HA68**



**HA69**



**HA70**



**BROWN/GRAY VINYL PLANK FLOOR**



**BEIGE GROUT/MORTAR 12"X12" TILE**





**BLACK VINYL FLOOR TREAD**



**GRAY VINYL SHEET FLOOR**



**BLUE/WHITE VINYL SHEET FLOOR**



**FIBERGLASS ATTIC INSULATION**



**12"X12" VINYL FLOOR TILE – UNIT 36**



**GRAY 12"X12" VINYL FLOOR TILE- OFFICE**





**BEIGE 12"X12" VINYL FLOOR TILE -  
OFFICE**



**GROUT/MORTAR 1"X1" CERAMIC FLOOR  
TILE - OFFICE BATHROOMS**



**BEIGE 12"X12" VINYL FLOOR TILE -  
MAINTENANCE BUILDING**



**BEIGE 12"X12" VINYL FLOOR TILE -  
MAINTENANCE BUILDING**



**GROUT/MORTAR 12"X12" RED CERAMIC  
FLOOR TILE – MAINTENANCE BUILDING**

**BLANK**

## **APPENDIX C**

### **EMPLOYEE & LABORATORY CREDENTIALS**

# SCDHEC ISSUED

Asbestos ID Card

**TIMOTHY QUINT**



**AIRSAMPLER  
CONSULTBI**

**AS-00541  
BI-002268**

**Expiration Date:**  
**08/02/24**  
**02/05/25**



# SCDHEC ISSUED

Asbestos ID Card

**Kathryn Hubicki**

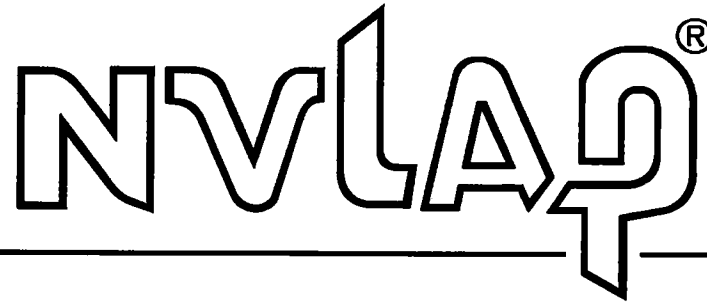


CONSULTBI  
CONSULTMP

BI-01079  
MP-000309

Expiration Date:  
06/03/25  
06/03/25

United States Department of Commerce  
National Institute of Standards and Technology



---

## Certificate of Accreditation to ISO/IEC 17025:2017

---

NVLAP LAB CODE: 101904-0

**AmeriSci Richmond**  
Midlothian, VA

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,  
listed on the Scope of Accreditation, for:*

### **Asbestos Fiber Analysis**

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.  
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality  
management system (refer to joint ISO-ILAC-IAF Communique on ISO/IEC 17025).*

---

2024-07-01 through 2025-06-30

*Effective Dates*

---

*For the National Voluntary Laboratory Accreditation Program*

**SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017**

**AmeriSci Richmond**  
dba AmeriSci Richmond  
13635 Genito Road  
Midlothian, VA 23112  
Cory M. Parnell  
Phone: 804-763-1200  
Email: [cparnell@amerisci.com](mailto:cparnell@amerisci.com)  
<http://www.amerisci.com>

**ASBESTOS FIBER ANALYSIS**

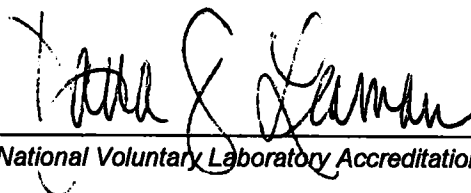
**NVLAP LAB CODE 101904-0**

**Bulk Asbestos Analysis**

<u>Code</u>	<u>Description</u>
18/A01	EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

**Airborne Asbestos Analysis**

<u>Code</u>	<u>Description</u>
18/A02	U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in 40 CFR, Part 763, Subpart E, Appendix A.



For the National Voluntary Laboratory Accreditation Program

## **APPENDIX D**

### **SITE PLAN**







## **GLOSSARY**

**Acoustical Plaster:** Sound absorbing finishing material mill-formulated for application in areas where a reduction in sound reverberation or noise intensity is desired. These materials usually are applied in a minimum thickness of 1/2" (13 mm). The finish material is applied over gypsum plaster, plaster brown coat or other base plaster. The surface material is usually friable and has a rough surface appearance.

**Acoustic Tile:** Tile-shaped blocks of sound absorbent material used for ceilings or as wall facing. May be glued to substrate or laid in a rigid grid work.

**ACM (ACBM):** Asbestos-Containing Material (Asbestos-containing Building Material). Any material containing greater than one percent asbestos by volume.

**Adequately Wet:** Adequately Wet means sufficiently mix or penetrate with liquid (amended water) to prevent the release of particulate. If visible emissions are observed coming from asbestos-containing material, then that material has not been adequately wetted. However, the absence of visible emissions is not necessarily sufficient evidence of being adequately wet.

**Air Monitoring:** The process of measuring the airborne fiber content of a specific volume of air.

**Amended Water:** Water to which a surfactant has been added for use in wetting ACM to control asbestos fibers.

**Asbestos:** Chrysotile, amosite, crocidolite, tremolite asbestos, anthophyllite asbestos, actinolite asbestos and any of these minerals that has been chemically treated and/or altered.

**Asbestos Abatement Contractor:** The firm contracted by the O&M Program Manager to perform emergency and non-emergency asbestos removal and/or repair.

**Asbestos-Containing Waste Material:** Any waste that contains commercial asbestos. This term includes filters from control devices, friable asbestos waste material, and bags or other similar packaging contaminated with commercial asbestos. As applied to demolition and renovation operations, this term also includes regulated asbestos-containing waste and materials contaminated with asbestos including disposable equipment and clothing.

**Asbestos debris:** Pieces of ACM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

**Asbestos Hazard Emergency Response Act (AHERA):** An EPA regulation published in 40 CFR §763 covering asbestos-containing materials in schools. AHERA requires local education agencies to identify ACM in their school buildings, develop an asbestos management plan (O&M) and implement this plan. This O&M Program utilized aspects of this standard.

**Asbestos O&M Work:** Cleaning, maintenance, repair or renovation work involving asbestos containing materials where the intent of the activity is not to remove asbestos. NESHAP requires that the owner or operator of a demolition or renovation activity conduct a thorough inspection of the affected facility or part of the facility where demolition or renovation will occur.

**Asbestos Program Manager:** A building owner or designated representative who supervises all aspects of the facility asbestos management and control program.

**Breathing Zone:** A hemisphere forward of the shoulders with a radius of approximately 6" to 9" (150-230 mm).

**Bridging encapsulant:** An encapsulant that forms a discrete layer on the surface of an in situ asbestos matrix.

**Certified Industrial Hygienist (CIH):** This individual is certified in the practice of industrial hygiene by the American Board of Industrial Hygiene.



**Concealed Suspension or Concealed Spline Ceiling System:** Presents a monolithic ceiling surface, unobstructed by the cross-hatching of exposed grid members. Tiles are typically 12" x 12" (305 x 305 mm) or 12" x 24" (305 x 610 mm) with slots cut into the edges of tiles for the purposes of accepting flat or "T" splines to support the tiles.

**Confined Space:** A space that has limited openings for entry and exit, unfavorable natural ventilation and/or a space not designed for continuous worker occupancy. Examples include boilers, furnaces, pits, septic tanks, manholes and utility vaults.

**Critical Barrier:** One or more layers of polyethylene taped in place over openings into a work area. Openings to be covered include doors, windows, diffusers, and any other opening that could allow outside air into a work area.

**Decorative Acoustic Finish:** Finishing material mill-formulated and spray applied up to about 3/8" (10 mm) thick over gypsum wallboard. Material has a rough surface and is similar in appearance to acoustic plaster but is not designed for sound absorption.

**Delamination:** Separation of one layer from another.

**Disposal Bag:** Properly labeled 6 mil (0.15 mm) thick (or thicker) leak-tight plastic bags used for transporting asbestos waste from work and to disposal site.

**Drop Cloth (Polyethylene):** A layer of polyethylene on the floor of a work area to protect the floor below from contamination and to facilitate the clean-up of dust or debris generated during the work.

**Encapsulant:** A material that surrounds or embeds asbestos fibers in an adhesive matrix, to prevent release of fibers.

**Enclosure:** The construction of an air-tight, impermeable, permanent barrier around asbestos-containing material to control the release of asbestos fibers into the air.

**EPA:** U.S. Environmental Protection Agency

**Excursion Limit (EL):** The OSHA term used to define a maximum airborne concentration of asbestos in fibers per cubic centimeter as averaged over a sampling period of thirty minutes.

**Fiber Release:** Any uncontrolled or unintentional disturbance of ACM resulting in visible emission.

**Fireproofing:** Material applied to structural elements or systems which provides increased fire resistance, usually serving no structural function. This material is typically applied using spray equipment.

**Friable Asbestos:** (See "Regulated ACM")

**Glovebag:** A polyethylene or polyvinyl chloride bag-like enclosure affixed around an asbestos-containing source (most often, TSI) so that the material may be removed while minimizing release of airborne fibers to the surrounding atmosphere.

**HEPA Filter:** High-Efficiency Particulate Air Filter. Such filters are rated to trap at least 99.97% of all particles 0.3 microns (0.3  $\mu\text{m}$ ) in diameter or larger.

**Independent Project Monitor:** This individual is a CIH or one who performs asbestos abatement project monitoring under the direct supervision of a CIH. Responsibilities include: Inspections, Air Monitoring, Exposure Assessments, etc..

**Maintenance/Custodial Workers:** These individuals are employees of the building management who are responsible for performing limited O&M clean-up and removal activities.

**Medical Surveillance:** A periodic comprehensive review of a worker's health status. The required elements of an acceptable medical surveillance program are listed in the Occupational Safety and Health Administration standards for asbestos.

**Mini-Enclosure:** An enclosure constructed of polyethylene sheeting used for small scale, short duration asbestos maintenance or renovation work. Mini-enclosures can be small enough to restrict entry to the asbestos work area to one worker. Appendix G to OSHA regulation 29 CFR 1926.58 discusses mini-enclosures and recommends that a change room be constructed contiguous to the mini-enclosure.

**Miscellaneous ACM:** Interior asbestos-containing building material on structural components, structural members or fixtures, such as floor and ceiling tiles; does not include surfacing material or thermal system insulation.

**Negative Pressure System:** A local exhaust system intended to prevent the escape of contaminated air to the surrounding environment. It utilizes HEPA filtration capable of maintaining a pressure differential with a lower pressure inside the Work Area than in any adjacent area. This system recirculates clean air and/or generates a constant flow of air from adjacent areas into the work area.

**Negative Pressure Respirator:** A respirator in which the air pressure inside the respiratory-inlet covering is positive during exhalation in relation to the air pressure of the outside atmosphere and negative during inhalation in relation to the air pressure of the outside atmosphere.

**NESHAP:** National Emission Standard for Hazardous Air Pollutants - EPA Rules under the Clean Air Act.

**NIOSH:** The National Institute for Occupational Safety and Health, which was established by the Occupational Safety and Health Act of 1970. Primary functions of NIOSH are to conduct research, issue technical information, and certify respirators.

**Operations & Maintenance (O&M) Program:** A program of work practices to maintain ACM in good condition, ensure clean up of asbestos fibers previously released, and prevent further release by minimizing and controlling ACM disturbance or damage.

**Occupied Area:** An area where personnel are present and are performing their normal activities intended for the area (such as in a typical office area from 8:00 to 5:00 p.m., Monday through Friday).

**OSHA:** Occupational Health & Safety Administration

**OSHA Class I Work** means activities involving the removal of TSI and surfacing ACM and PACM.

**OSHA Class II Work** means activities involving the removal of ACM which is not thermal system insulation or surfacing material. This includes, but is not limited to, the removal of asbestos-containing wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

**OSHA Class III Work** means repair and maintenance operations, where "ACM," including TSI and surfacing ACM and PACM, is likely to be disturbed.

**OSHA Class IV Work** means maintenance and custodial activities during which employees contact but do not disturb ACM or PACM and activities to clean up dust, waste and debris resulting from Class I, II, and III activities.

**Penetrating Encapsulant:** An encapsulant that is absorbed by the in situ asbestos matrix without leaving a discrete surface layer.

**Personal Air Samples:** An air sample taken with a sampling pump directly attached to the worker with the collecting filter and cassette placed in the worker's breathing zone. These samples are required by the OSHA asbestos standards and the EPA Worker Protection Rule.

**Phase Contrast Microscopy (PCM):** A method of analysis using a light microscope, used to find the concentration of airborne fibers. Does not distinguish among asbestos and other fibers. Used by OSHA to find personal exposures, and by EPA to find area levels for AHERA project clearance.

**Plenum:** Any space to convey air in a building or structure. The space above a suspended ceiling is often used as an air plenum. This term is also used in the work practices to refer to spaces above a ceiling not used to convey air.

**Polarized Light Microscopy (PLM):** A method of analysis using a light microscope to find the chemical or mineral types of samples, including the concentration of asbestos in bulk materials. Used by EPA for AHERA and NESHAP, and by OSHA to see if asbestos is involved in a project.

**Presumed Asbestos Containing Material (PACM)** refers to materials that were presumed to contain asbestos and therefore not sampled by the certified asbestos inspector.

**Protection Factor:** The ratio of the ambient concentration of an airborne substance to the concentration of the substance inside the respirator at the breathing zone of the wearer. The protection factor is a measure of the degree of protection provided by a respirator to the wearer.

**Regulated ACM (RACM)** is categorized as (a) Friable asbestos material (b) Category I nonfriable ACM that has become friable (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.

**(Note:** *Regulated ACM is an EPA NESHAP concept. OSHA makes no distinction between friable and non-friable asbestos.*)

“Cutting” means to penetrate with a sharp-edged instrument and includes sawing, but does not include shearing, slicing or punching.

“Grinding” means to reduce to powder or small fragments and includes mechanical clipping or drilling.

**Friable asbestos material** means any material containing more than 1 percent asbestos as determined using the method specified under AHERA (40 CFR Part 763, Sub-part F, Appendix A, section 1, Polarized Light Microscopy) that, when

dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM.

**Category I Nonfriable asbestos-containing material (ACM)** means asbestos-containing packing, gaskets, resilient floor covering and asphalt roofing products containing more than 1 percent asbestos as determined using the method specified under AHERA.

**Category II Nonfriable ACM** means any material, excluding Category I nonfriable ACM containing more than 1 percent asbestos as determined using the methods specified under AHERA, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

**Remove:** For Operations and Maintenance work on ACM, “remove” refers to the removal of ACM as needed to perform a maintenance or repair O&M activity.

**Repair:** Returning damaged ACM to an undamaged condition or to an intact state so as to prevent fiber release.

**Respirator:** A device designed to protect the wearer from the inhalation of harmful particulate.

**Surfacing ACM:** Asbestos-containing material that is sprayed-on, troweled-on or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural member, or other materials on surfaces for acoustical, fireproofing, or other purposes.

**Suspended “T” Bar Ceiling System:** A false or dropped ceiling composed of acoustic tiles laid into an inverted metal “T” bar grid frame suspended by wires from building framing members.

**Surfactant:** A chemical wetting agent added to water to improve penetration, thus reducing the quantity of water required for a given operation or area.

**Temporary Barriers:** One or more layers of 6 mil polyethylene installed to isolate a work area from other portions of a facility.

**Thermal System Insulation (TSI):** Thermal system insulation - asbestos-containing material applied to pipes, fittings, boilers, breaching, tanks, ducts or other interior structural components to prevent heat loss or gain or water condensation.

**Time Weighted Average (TWA):** In air sampling, this refers to the average air concentration of contaminants during a particular time period.

**Transmission Electron Microscopy (TEM):** A method of analysis using an electron microscope, used to find and analyze the concentration of airborne or bulk asbestos fibers and structures. Distinguishes among asbestos and other materials; can detect smaller asbestos fibers than does PCM. Used by EPA to find area concentrations for large AHERA project clearance.

**Work Area:** The area where asbestos-related work or removal operations are performed which is defined and/or isolated to prevent the spread of asbestos dust, fibers of debris, and entry by unauthorized personnel.

**Work Practices:** Procedures designed to be followed to avoid or minimize fiber release during activities affecting ACM.





# **O&M WORK PRACTICES**

## **W-1 TOOLS, EQUIPMENT AND MATERIALS**

The following is a list of tools, equipment and materials that are recommended to perform the work practices.

### **Tools and Equipment**

- Utility knife
- Ground fault circuit interrupters (GFCI's), Extension cords and adapters
- Lockout tags
- Temporary work lights
- Wet wipes or bucket with clean water for wet wiping
- Smoke test bulb and tubes
- Wire cutters
- Tin snips
- Safety glasses
- Disposable coveralls

### **Abatement Equipment and Materials**

- Polyethylene sheeting (6 mil thickness)
- Duct tape
- HEPA-Vacuum
- Disposal bags with labels
- Respirators
- Disposable coveralls (if required)
- Disposable towels or wet wipes
- Garden sprayer with amended water

## **W-2 PREPARING AMENDED WATER**

Amended water solutions are prepared by mixing a measured amount of surfactant with clean water in accordance with the manufacturer's instructions. Surfactants might be considered hazardous substances. Review and comply with Material Safety Data Sheet (MSDS) before mixing and using these materials. Amended water shall be mixed in a labeled garden sprayer unit prior to the start of an O&M activity. Some practitioners have reported that liquid dishwashing detergent might be used as a surfactant for O&M work. They have used a mix of eight parts water to one part detergent. Amended water is to be used whenever materials are friable and have the potential to release fibers into the air.

### **W-3 SHUT-OFF AND LOCKOUT OF BUILDING SYSTEMS**

In emergency situations, any mechanical, plumbing or electrical system(s) that might be affected by O&M activities shall be shut off, locked and tagged out with lockout tags at the circuit breaker panel or disconnect switch.

Building systems in a work area, systems that serve a work area, or systems that will be worked on during OSHA Class I, II, III activities shall be shut down prior to commencement of work. OSHA Class IV activities do not require building system shut down. Any air-handling systems (supply, return and exhaust) required to be shut down shall be shut off prior to the commencement of work as well as be locked and tagged with lockout tags at the circuit breaker panel or disconnect switch.

Lockout tags shall note when and why power is shut down and the personnel performing the lockout. There is to be only one key for each lock used on lockout tags to prevent accidental reactivation of equipment.

### **W-4 SECURING WORK AREA**

In an emergency situation, maintenance or custodial workers may restrict access to immediately affected areas of the building if there is no potential for an asbestos exposure to those workers. If there is potential for asbestos exposure, workers shall secure the area to the next cleanest room, doorway, entrance, etc.. Maintenance workers may restrict the area by whatever means necessary. Work areas shall be vacated and secured (where feasible) by locking doors (from inside the area if possible) or other means. Access to the work area shall be restricted by asbestos barrier tape and "keep-out" signs around the perimeter of the work area. Install barrier tape and signs by taping or tying to fixed objects.

### **W-5 PUTTING ON RESPIRATORS AND PERFORMING FIT CHECKS**

The procedures described below are based on the assumption that workers wearing respirators have been trained in the use of respirators and, for negative pressure respirators, fit tested, and enrolled in a medical surveillance program as part of a Respiratory Protection Program. Respirators used shall be approved by NIOSH and/or MSHA. These procedures are not a substitute for a Respiratory Protection Program in accordance with OSHA standard 29 CFR §1910.1001 and 29 CFR §1926.1101

#### **Putting on Respirator**

Wearers shall inspect their respirators before each use of the respirator. Respirators must not be damaged, have missing parts or be deformed in any way. The straps must be intact and well attached. Proper filter cartridges for the hazards to be encountered must be installed. Verify that filters have been replaced in accordance with the Respiratory Protection Program. Batteries for powered respirators shall be fully charged.

The respirator shall also be cleaned if it was not cleaned after the last use. If any problems exist, the respirator shall be repaired or replaced in accordance with the Respiratory Protection Program.

When putting on a respirator, the straps shall be loosened before it is put on. Filter caps (such as those used on some Powered Air Purifying Respirators) shall be taped to the filter body or stored where it will not be lost. The respirator shall be put on and then the straps tightened as recommended in the manufacturer's information provided with the respirator. Fit checks shall then be performed.

### **Fit Checks**

Fit checks shall be performed in accordance with the Respiratory Protection Program by each worker each time they put on a respirator. Both positive and negative pressure fit checks are to be performed. A negative pressure fit check is done by donning the respirator and pulling the respirator straps so the unit fits snugly. Inhale gently while placing hands over filters to block off inhalation side. Respirator shall pull to face and no air shall leak in around face seal. A positive pressure fit check is done by exhaling gently (without breaking respirator seal to face) breathing normally while blocking off the exhalation valve. The face piece shall then expand away from face while exhaling. Adjust respirator straps as needed to obtain a good seal of the facepiece to the face. If a good seal cannot be obtained, obtain a new respirator and perform fit tests again.

### **W-6 PROTECTIVE CLOTHING**

Protective clothing for workers typically consists of disposable coveralls, gloves and boots. Coveralls shall have hoods and booties attached. They shall provide complete coverage of the body with the exception of hands and face. Cloth coveralls that are cleaned by a facility equipped to launder asbestos contaminated clothing might also be used. Do not modify coveralls.

If street clothes could become contaminated, two coveralls shall be worn, or the street clothes shall be removed before the start of work. When possible, street clothes shall be removed in a changing area before protective clothing is put on. Protective clothing shall be put on after respirators. The coverall hood shall cover respirator straps.

Workers are encouraged to wear protective gloves that are duct taped at the cuffs to the protective coveralls. Eye, hearing, and head protection shall also be used where needed. Rubber slip-resistant boots are recommended for work areas where slip hazards might occur (protective booties shall cover feet inside the boots). Steel-toed boots shall be used in areas where foot hazards exist. Do not use coveralls with loose foot coverings for activities that involve climbing ladders or working on scaffold.

## **W-7 PRECLEANING WORK AREAS AND WET WIPING**

Precleaning of work areas prior to the start of work is performed to remove historical dust that could be disturbed during the work. Precleaning includes picking up dust and debris with a HEPA vacuum, wet wiping non-porous surfaces, HEPA vacuuming surfaces that cannot be wet wiped, and cleaning any carpeted surfaces using steam extraction equipment.

### **Wet Wiping**

The procedures to be used for wet wiping are as follows:

- Immerse disposable towel in bucket containing amended water.
- Wring out towel and fold into quarters.
- Wipe surface and refold to have a clean face exposed. Do not place towel back into bucket or water will become contaminated and will need to be replaced.
- Repeat step 3 until all faces of towel have been used. Obtain a clean towel if more wiping is needed.
- Dispose of used towels in asbestos disposal bags.
- Dispose of contaminated water as required by applicable regulations. **See contaminated water disposal procedure in the following text.**

### **HEPA Vacuuming**

The procedures to be used for HEPA vacuuming are as follows:

- For floors, use a floor attachment with rubber floor seals and adjustable floor-to-attachment height. For furniture, fabrics or other surfaces use an upholstery attachment or brush attachment.
- Vacuum hard or smooth surfaces with attachment about 1/16" (2 mm) above the surface.
- Vacuum carpet or fabrics with attachment just touching the surface.
- Vacuum all surfaces in parallel passes with each pass overlapping the previous one by one-half the width of the attachment.
- Once surfaces are cleaned in one direction, clean a second time at right angles to the first cleaning.
- Use crevice brush or other tools to clean irregularly shaped surfaces.

### **Steam Cleaning Carpet**

The procedures to be used for steam cleaning carpet are as follows:

- Steam clean carpet using carpet tool.
- Steam clean all surfaces in parallel passes with each pass overlapping the previous one by one-half the width of the attachment.
- Once surfaces are cleaned in one direction, clean a second time at right angles to the first cleaning.
- Water from cleaning process shall be treated in accordance with applicable

regulations - **See contaminated water disposal procedure in the following text.**

#### **W-8 SETTING UP WORK AREAS**

Maintenance workers performing O&M activities shall isolate the work area by installing critical barriers. A critical barrier is a six millimeter polyethylene sheet that covers an opening thus isolating air movement into or out of a work area. Work area isolation is not to be used in place of good work practices. Work practices such as wetting ACM, careful handling and local collection by HEPA vacuum shall be the primary means of fiber control during O&M work. Polyethylene protection is intended as a secondary means of protection during the work. State or local codes might require that fire retardant polyethylene be used for asbestos related work.

#### **W-9 PACKAGING AND LABELING WASTE**

If the applicable disposal site requires non-friable materials to be treated the same as friable materials then the following NESHAPS, DOT and other requirements apply. Although the following may apply even if the landfill does recognize non-friable asbestos containing waste, the Program Manager will be ultimately responsible for communications with the landfill for specific requirements of packaged asbestos containing waste. The Program Manager will notify the O&M workers of disposition of asbestos waste transport and disposal.

Asbestos-containing waste material from O&M activities shall be adequately wet in accordance with the NESHAP requirements (40 CFR §61.150). Verify waste packaging and other waste disposal requirements with the landfill that will receive the asbestos waste. Pre-labeled asbestos disposal bags shall be used for asbestos waste disposal where possible, appropriate and permissible. Disposal bags shall be collapsed by evacuating the air from the bag with a HEPA vacuum in the work area or enclosure. Once collapsed, twist the bag to form a neck and wrap it tight with duct tape. Fold neck of bag over to form a loop, then again wrap duct tape around neck and loop.

Asbestos waste is required to be placed into a disposal bag and sealed as described above then placed into a 55 gallon drum disposal. Label the disposal drum as required by applicable NESHAP, OSHA and DOT regulations.

All waste shall be labeled as required by federal, state and local regulations. Federal regulations requiring labeling of waste include OSHA regulations 29 CFR §1910.1200, §1910.1001 and §1926.1101, EPA's NESHAP regulation 40 CFR §61.150, and the Department of Transportation's Hazardous Materials Regulations 49 CFR §171 and 180. ACM packaging must meet general DOT and EPA requirements and be protective, marked and labeled. The OSHA requirements apply regardless of the amount of waste or measured exposure levels (see 29 CFR §1926.1101(l)).

## **Labels Requirements**

**OSHA 29 CFR 1926.1101(k)(2) requirement:**

**DANGER  
CONTAINS ASBESTOS FIBERS  
AVOID CREATING DUST  
CANCER AND LUNG DISEASE HAZARD**

### **Department of Transportation (DOT) requirement**

DOT's shipping paper and marking format, is:

- RQ, (Reportable Quantity, if over 1 lb (.4 kg) friable asbestos)
- WASTE (For transportation of waste material, if applicable)
- ASBESTOS (Shipping name; asbestos descriptions; see below)
- MIXTURE (For asbestos mixed with a binder or filler, etc.)
- Class 9 (Miscellaneous Hazardous Materials, includes asbestos)
- LTD QTY, (Limited quantity, if applicable)
- 20 OZ (.6 kg) (Total quantity of material described; may abbreviate unit)

### **NESHAP requirement**

NESHAP requires that readily visible and legible warning labels as specified by OSHA under 29 CFR §1910.1001 or §1926.1101 be used on waste containers or wrapped materials. Waste material to be transported off the facility site must also be labeled with the name of the waste generator and the location at which the waste was generated. The labels shall have the appropriate information preprinted on the label. No hand written labels are allowed.

## **W-10 CLEANING TOOLS, EQUIPMENT, AND WORK AREA**

Clean tools and equipment using HEPA vacuuming and/or wet wiping procedures. Special attention shall be given to cleaning extension cords, equipment wheels, vacuum hoses and other items that could pick up debris during the work. Tools and equipment shall be placed outside of the work area as soon as cleaning is completed. All polyethylene that is used shall be disposed of as ACM. Any items that cannot be fully cleaned (such as boots or tools) that might be used in another O&M activity shall be placed into disposal bags, sealed and labeled as ACM. These exterior of the bags shall be wet wiped and then placed away from the work area with the other tools and equipment. HEPA vacuum hoses can be sealed with tape over both ends if the outside of the hose is clean.

Cleaning of the work area where an O&M activity is conducted consists of HEPA vacuuming and/or wet wiping (as appropriate) all surfaces in the area.

The HEPA vacuum shall not be opened by maintenance personnel on the property site.



An abatement contractor shall be employed to empty and clean the vacuum in a contained area off site once a month, or as needed.

#### **W-11 DECONTAMINATING WASTE**

The exterior of packaged waste shall be HEPA vacuumed and wet wiped before it is moved out of the area/building. Packaged waste (barrel) shall be stored on a sheet of polyethylene when it is moved outside of the work area to the storage area.

#### **W-12 WORKER DECONTAMINATION AND REMOVAL OF PROTECTIVE CLOTHING**

Decontamination and removal of protective clothing following O&M activities shall use the applicable procedure(s) described below:

##### **Removal of Protective Clothing**

When drop cloth work area protection, or no work area protection, is required, HEPA vacuum all parts of protective clothing while standing at perimeter of drop cloth. Leaving respirator in place, remove protective clothing and fold inside out as it is removed. Place clothing, if contaminated, into a disposal bag and label as ACM waste.

##### **Street Clothes**

If street clothes are worn under protective clothing and are contaminated during the work, the street clothes shall be HEPA vacuumed, removed during decontamination and placed into a labeled disposal bag. These street clothes shall then be disposed of as ACM or taken to a facility that has equipment designed for cleaning asbestos-contaminated clothing.

##### **Removal of Respirator**

The procedures described below are based on the assumption that workers wearing respirators have been trained in the use of respirators and, for negative pressure respirators, fit tested, and enrolled in a medical surveillance program as part of a Respiratory Protection Program.

Remove respirator after removing protective clothing (if used). Before removing respirator, wash hands, face and surface of respirator with clean water and disposable towels. Use caution to avoid breaking seal between respirator facepiece and face. Avoid getting water into filter cartridges of respirator. Place disposable towels into a disposal bag. Remove respirator and follow procedures specified in Respiratory Protection Program for cleaning and storing respirator.

#### **W-13 VISUAL INSPECTIONS**

The Program Manager shall develop a protocol for performing visual inspections

following O&M work. A visual inspection shall be conducted prior to the completion of air sampling (if performed) to verify that all visible dust or debris has been cleaned up. The person performing the inspection is allowed to be a worker that reports directly to the Program Manager. When the APM or another person makes this inspection, they shall wear the same type of personal protective equipment worn by the workers. If visible dust or debris remains, it must be cleaned up using wet wiping and/or HEPA vacuuming before clearance sampling is performed (if necessary).

#### **W-14 WASTE TRANSPORTATION, STORAGE AND DISPOSAL**

An abatement contractor shall be hired to transport asbestos waste from O&M activities to an approved landfill after the work is completed. Workers transporting waste shall follow Respiratory Protection Program recommendations concerning respirator requirements for transporting asbestos waste. Do not drag packaged waste. All waste shall be lifted and carried, or transported in wheeled carts, when moved from one area to another. Packaged waste shall be placed, not thrown or dropped, into vehicles, storage areas and the landfill.

Asbestos waste that is pending transport to a landfill shall be stored in a secure, lockable area. Signage in accordance with OSHA and NESHAP shall be posted at the storage area and on vehicles used to transport asbestos-containing waste material during loading and unloading. When asbestos waste in the storage area is taken to a landfill, it shall be transported in accordance with all applicable federal, state and local regulations. Asbestos waste shipment records shall be completed in accordance with the requirements in NESHAP Section 61.150.

The workers conducting O&M activities shall document waste in a manner established or approved by the Program Manager. Once the documentation is completed and the waste is stored or taken to a landfill, the documentation shall be turned over to the Program Manager to file with O&M records. The NESHAP waste shipment records must also be completed (where applicable) and filed with waste disposal records.

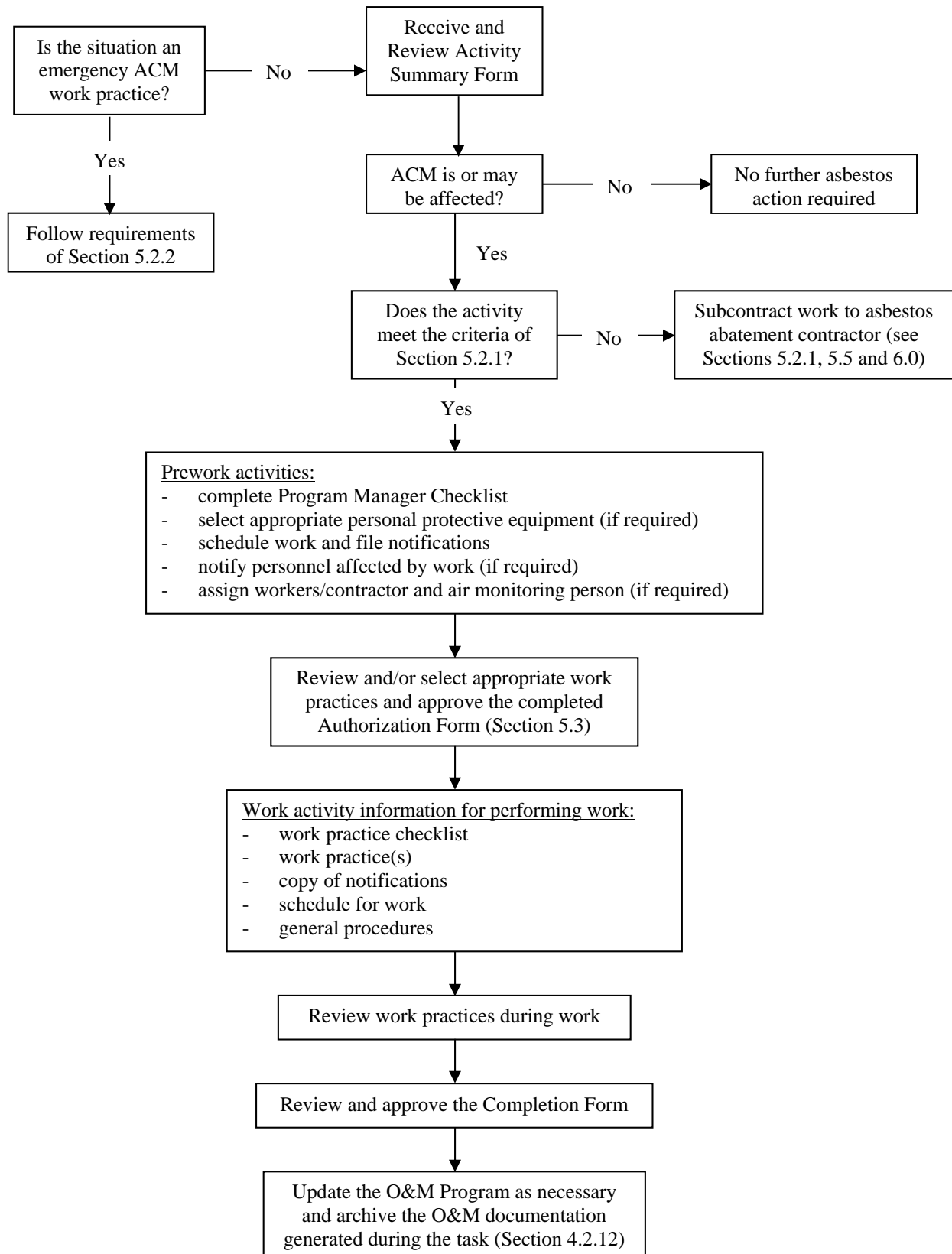
#### **W-15 DISPOSAL OF CONTAMINATED WATER**

Contaminated water from O&M activities shall be stored in a leak-proof plastic waste drum. The drum shall be stored on site until it can be transported by the abatement contractor to a location with filtering equipment. A drum containing waste water can be stored on site for a minimum of 30 days.



# Program Manager Decision-Making Flowchart

## Work Practice Selection and Use For Non-Emergency ACM Work Practices





## ACTIVITY SUMMARY FORM

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Telephone No. \_\_\_\_\_ Job Request No. \_\_\_\_\_

Requested starting date: \_\_\_\_\_

Anticipated finish date: \_\_\_\_\_

Address, building, and room number(s) (or description of area) where work is to be performed:

Description of work:

Description of any asbestos-containing material that might be affected. if known (include location and type):

Name and telephone number of requestor:

Name and telephone number of supervisor:

Submit this application to:

Program Manager

**NOTE:** An Activity Summary form must be submitted for all maintenance work whether or not asbestos-containing material might be affected. An authorization must then be received before any work can proceed.

\_\_\_\_\_ Granted (Job Request No.) \_\_\_\_\_

\_\_\_\_\_ With conditions\*

\_\_\_\_\_ Denied

\*Conditions:

## **AUTHORIZATION FORM**

Authorization No. \_\_\_\_\_

**Authorization is given to proceed with the following maintenance work:**

### **PRESENCE OF ASBESTOS-CONTAINING MATERIALS**

\_\_\_\_\_Asbestos-containing materials are not present in the vicinity of the maintenance work.

\_\_\_\_\_ACM is present, but its disturbance is not anticipated: however, if conditions change, the Asbestos Program Manager will re-evaluate the work request prior to proceeding.

\_\_\_\_\_ACM is present, and may be disturbed.

### **Work Practice if Asbestos-Containing Materials Are Present**

The following work practices shall be employed to avoid or minimize disturbing asbestos:

### **Personal Protection if Asbestos-Containing Materials Are Present**

The following equipment/clothes shall be used/worn during the work to protect workers:

### **Special Practices and/or Equipment Required**

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Asbestos Program Manager

## COMPLETION FORM

### Evaluation of Work Affecting Asbestos-Containing Materials

This evaluation covers the following maintenance work:

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

Date(s) of work: \_\_\_\_\_

Description of work: .....

Work approval form number: \_\_\_\_\_

Evaluation of work practices employed to minimize disturbance of asbestos:

Evaluation of work practices to contain released fibers and clean up:

Evaluation of equipment and procedures used to protect workers:

Personal air monitoring results: (in-house worker or contract?)

Worker name \_\_\_\_\_ Results: \_\_\_\_\_

Worker name \_\_\_\_\_ Results: \_\_\_\_\_

Handling or storage of ACM Waste: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Asbestos Program Manager





## **ASBESTOS PROGRAM MANAGER CHECKLIST**

Work to be performed:

- \_\_\_ Review or request survey data to determine whether ACM is affected.
- \_\_\_ Review historical air monitoring data for work practices to be used.
- \_\_\_ Work Practice(s) selected for all ACM to be encountered.
- \_\_\_ Select personnel protective equipment and decontamination requirements to be used (if needed).
- \_\_\_ Select appropriate materials and review potential hazards (confined spaces, scaffold use, etc.).
- \_\_\_ Schedule work when area is not in use or plan developed to isolate area (if necessary).
- \_\_\_ Federal, state and local notifications filed (if applicable).
- \_\_\_ Notify Occupants/personnel affected by work .
- \_\_\_ Assign workers (or contractor) with appropriate level of training. Verify currency of training, fit tests, and medical surveillance.
- \_\_\_ Assign air monitoring person/Independent Project Monitor and determine air monitoring to be performed (if needed). Record and archive air monitoring results.
- \_\_\_ General Procedure(s) Reviewed
- \_\_\_ Schedule of work
- \_\_\_ Review work practices during work for compliance with requirements.
- \_\_\_ Complete Evaluation of Work Affecting ACM.
- \_\_\_ Retain and archive all required records in proper location..

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_  
Asbestos Program Manager

## **ANNUAL O&M PROGRAM REVIEW**

It is the policy of the Management to review this Asbestos O&M Program on an annual basis (at a minimum) and ensure that the program is being adhered to. This O&M Program cannot be modified without prior approval from the Property Owner or their representative.

This O&M Program was last reviewed by:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Modifications were made to the following section(s):

\_\_\_\_\_  
\_\_\_\_\_

This O&M Program was last reviewed by:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Modifications were made to the following section(s):

\_\_\_\_\_  
\_\_\_\_\_

This O&M Program was last reviewed by:

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Modifications were made to the following section(s):

\_\_\_\_\_  
\_\_\_\_\_



## EMERGENCY NOTIFICATION FORM

Building:

Material Location(s):

Material Type:

Describe Damage:

Response Priority:   High      Medium      Low

Immediate Response Taken (if any):

Potential for Immediate Exposure to Occupants/Workers:

High      Medium      Low

Print Name

Signature.....

Date .....

## ASBESTOS NOTIFICATION

FACILITY: Northgate Manor  
220 Biblebrook Drive  
Greer, South Carolina

To: Building Occupants *\*\*\*Include others as necessary\*\*\**  
From: Asbestos Program Manager  
Date: *\*\*\*Date\*\*\**

A comprehensive pre-renovation asbestos survey was performed on this property on October 7-8, 2024. The materials that were identified as ACMs or assumed to contain asbestos are included in an Operations and Maintenance (O&M) Program. The O&M Program outlines safe practices and procedures for maintenance and custodial workers to follow when performing normal duties that may impact ACM. Also included in the Program are practices and procedures for the control of asbestos when damage occurs.

Adverse health effects related to asbestos exposures are known to occur as a result of exposure to excessive asbestos concentrations. However, exposures to low concentrations of asbestos fibers may also result in adverse health effects. Inhalation and ingestion of asbestos fibers have been implicated in a number of respiratory and digestive system diseases. The O&M Program is designed to prevent asbestos exposures and protect human health and the environment from the hazards associated with exposure to airborne asbestos fibers.

The O&M Program requires a re-inspection of ACMs to be performed every six months. Building occupants shall be informed of the results of the inspection by means of this notification. Included in the following is a list of ACMs or presumed ACMs that are present in the facility.

- Vinyl flooring and stair tread materials and associated mastics
- Ceramic floor tile grout

If there are any materials that you have identified from the information in this notification, that are not in good condition, please contact the Asbestos Program Manager immediately.

General procedures which should be followed to ensure the health and safety of all tenants, employees, and outside contractors from asbestos exposure include:

- Avoid damaging, disturbing and/or crushing the asbestos-containing materials within the facility.
- If damaged and/or dislodged asbestos-containing materials are observed, evacuate the general area and notify the asbestos program manager. Please do not attempt to clean or repair the materials. Avoid walking on or through the area(s) where damaged ACM is present.



## OVERVIEW OF GENERAL OPERATION AND MAINTENANCE ACTIVITY

Activities which may impact or disturb any asbestos-containing materials or any suspect ACM are not permitted to be performed by any maintenance personnel or tenants of the building. Activities which may be performed under the O&M program using a work permit program include general maintenance. The maintenance staff should follow these procedures:

- (1) Refer to the ACM inspection report to determine if any ACM is present in the area where the work will occur. If ACM is present, but is not expected to be disturbed, the building owner/management should note the presence of the ACM on the permit form.
- (2) If ACM is both present and likely to be disturbed, the building owner/management should visit the area where the work is to be performed and determine what work practices should be instituted to minimize the release of asbestos fibers during the maintenance activities.
- (3) The determination should be recorded on a Maintenance Work Authorization Form, which is then forwarded to the in-house maintenance supervisor or to the maintenance contractor to authorize the work. The building owner/management should ensure a copy of both the request and authorization forms are placed in a permanent file.
- (4) Where the task is not covered by previously approved standard work practices, the two-hour trained and six-hour trained maintenance workers should contact the Asbestos Program Manager for the approval of work methods prior to the commencement of the work. The building owner/management should ensure the appropriate work practices and protective measures are used for the job.
- (5) For all jobs where contact with ACM or PACM is likely, the building owner/management should visit the work site prior to the commencement of the work to ensure the job is being performed properly.
- (6) The building owner/management's observations should be documented on an Evaluation of Work Form. Any deviation from standard and approved work practices should be recorded immediately on the Evaluation of Work Form and the practices should be immediately corrected.
- (7) Upon completion of the work, a copy of the Evaluation of Work Form should be placed in the permanent asbestos file.



## GUIDANCE FOR THE CLEANING OF ASBESTOS DUSTS AND DEBRIS

In areas where the known asbestos-containing materials are noted to be damaged or deteriorating then asbestos dust and debris clean-up is warranted. In addition, areas containing damaged asbestos should be cleaned on a regular basis to minimize the collection of asbestos dusts. Cleaning of asbestos dusts is conducted through typical wet mopping methods and proper disposal of the wastes. If elevated levels of settled asbestos dusts are suspected, cleaning practices can be supported with the use of a HEPA vacuum. The following are asbestos dust cleaning protocols:

- (1) Prepare cleaning solution per amended water instructions (See Appendix C).
- (2) If settled dusts are present to the naked eye, initially vacuum the affected area with a HEPA style vacuum. DO NOT use a conventional vacuum.
- (3) Apply a coat of cleaning solution and allow to activate for 10-15 minutes.
- (4) Mop affected area with a clean mop. Replace mop head each 500 square feet of surface area to insure that contaminated mop heads are not used. DO NOT vacuum excessively wet areas with a HEPA style vacuum.
- (5) Dispose of all mop heads in accordance with state and federal regulations.
- (6) Perform asbestos in dust clearance testing if necessary (See Section 5.5.2.1).

In areas where the known or presumed asbestos-containing material is damaged, the maintenance staff may need to repair the building components as a maintenance activity (not an asbestos removal activity). Repair activities should employ the following steps:

- (1) Conduct work during off-hours and isolate the area to prevent unauthorized personnel access.
- (2) Turn off air handling units such as air conditioning and/or heating unit.
- (3) Prepare work area by sealing the area (i.e. heating vents, windows and doors) by covering with polyethylene sheeting.
- (4) Maintenance staff shall don approved respirators and protective personnel equipment/clothing.
- (5) Repair damaged surface area using an approved asbestos abatement methodology and seal with an encapsulant.
- (6) Clean-up enclosed area and clean-up potential asbestos dusts per dust cleaning methodologies.

- (7) Dispose of all used cleaning supplies, containment barriers, and asbestos debris/dust in accordance with state and federal regulations.

## GUIDANCE FOR VINYL FLOORING AND STAIR TREAD MATERIALS

The vinyl flooring and stair tread materials and associated mastics located at the subject property are presumed to contain asbestos. Prohibitions and limitations apply to the care of these materials:

- No sanding of these materials;
- Floor stripping must use low abrasion pads at speeds below 300 rpm and wet methods;
- Dry buffing may be performed at any speed as long as the flooring has sufficient finish to prevent the pad from contacting the flooring material.

For removing non-friable vinyl resilient flooring or stair tread materials which contain ACM and where the employer has not proven the absence of ACM, the employer shall ensure that employees comply with the following work practices and that employees are trained in these practices:

- (1) Non-friable flooring, stair tread, its backing, or mastic shall not be sanded;
- (2) Vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) shall be used to clean floors;
- (3) All scraping of residual adhesive and/or backing shall be performed using wet methods;
- (4) Dry sweeping is prohibited;
- (5) Mechanical chipping is prohibited unless performed in a negative pressure enclosure which meets the requirements of section 29 CFR 1926.1101(g)(5) of the Construction standard;
- (6) Tiles shall be removed intact, unless the employer demonstrates that intact removal is not possible;

Removal of asbestos-containing flooring and stair tread materials is not allowed to be conducted by untrained and unlicensed staff.

## GUIDANCE FOR CERAMIC FLOOR TILE GROUT

The ceramic floor tile grout located at the subject property is presumed to contain asbestos. Prohibitions and limitations apply to the care of this category of material:

- \* No sanding of these materials;
- \* Floor stripping must use low abrasion pads at speeds below 300 rpm and wet methods;
- \* Dry buffing may be performed at any speed as long as the materials have sufficient finish to prevent the pad from contacting the grout material.

For removing non-friable ceramic floor tile grout which contains ACM or where the employer has not proven the absence of ACM, the employer shall ensure that employees comply with the following work practices and that employees are trained in these practices:

- (1) Non-friable ceramic tile grout shall not be sanded;
- (2) Vacuums equipped with HEPA filter, disposable dust bag, and metal floor tool (no brush) shall be used to clean these materials;
- (3) All scraping of residual adhesive and/or backing shall be performed using wet methods;
- (4) Dry sweeping is prohibited;
- (5) Mechanical chipping is prohibited unless performed in a negative pressure enclosure which meets the requirements of section 29 CFR 1926.1101(g)(5) of the Construction standard;
- (6) Tiles shall be removed intact, unless the employer demonstrates that intact removal is not possible;

Removal of asbestos-containing ceramic floor tile grout is not allowed to be conducted by untrained and unlicensed staff.

## ROUTINE HOUSEKEEPING DUTIES

If employees of the Northgate Manor perform routine custodial duties that involve working near or cleaning ACM that is not enclosed, sealed or otherwise protected from release of asbestos fibers into the air certain housekeeping procedures must be strictly adhered to. This activity is covered by the General Industry standard as long as no construction activity is involved.

- (1) The building owner/management must provide the affected workers with asbestos awareness training each year. The course must be provided at no cost to the employee. The course must also cover the health effects of asbestos exposure, the hazards of smoking and asbestos, use of respirators, locations of asbestos materials and signs of their damage, and who to tell and what to do if such materials are dislodged or become non-intact. This training must be provided regardless of the expected exposure levels to housekeepers.
- (2) In addition, if the building owner/management should reasonably expect that any of the housekeeping employees may be exposed in excess of a permissible exposure limit (PEL: 0.1 fibers per cubic centimeter as a time-weighted average over an 8 hour period or 1.0 fibers per cubic centimeter over a 30 minute period), then the following procedures must be adhered to:
  - (a) Monitor according to the OSHA standard's requirements to accurately determine the airborne concentrations.
  - (b) Provide employees with medical surveillance. A medical surveillance program requires the worker to complete a health questionnaire and may include a physical examination at no cost to the employee. The building owner/management must keep exposure and medical surveillance records for the duration of employment plus 30 years.
  - (c) Restrict access to areas of expected over-exposure
  - (d) Provide more extensive training: An annual asbestos awareness course is required. The course must be provided at no cost to the employee. The course must cover the health effects of asbestos exposure, the hazards of smoking and asbestos, use of respirators, locations of asbestos materials and signs of their damage, how to respond to asbestos exposure, and required housekeeping work practices.
  - (e) Provide appropriate respirators and protective clothing at no cost to employees to use while working in areas of potential over-exposure. Respirators must be equipped with HEPA filters.

Housekeeping activities conducted in the immediate area of friable or significantly damaged or loosely bonded ACM may indicate significant airborne exposure potential. Activities which release fibers from ACM such as grinding, cutting, or sanding, also have such potential. Please note that reference here is only to workers who are exposed to accessible asbestos when doing routine housekeeping activities. It does not include maintenance activities, repair, removal, or construction work that may involve disturbance or removal of asbestos-containing materials. Neither does it include clean-up and disposal of dust or debris resulting from construction, renovation, removal, repair, or maintenance activities. Performance of these tasks by the housekeeping employees may trigger additional obligations that are described elsewhere in this Operations and Maintenance Program.