

**FINDING OF SUITABILITY TO TRANSFER
(FOST)**

**Major Robert Kirkwood U.S. Army Reserve Center (DE005)
3931 Kirkwood Highway
Wilmington, Delaware 19801**

September 2012

**FINDING OF SUITABILITY TO TRANSFER
(FOST)
Major Robert Kirkwood USAR Center (DE005)
Wilmington, Delaware**

September 2012

1. PURPOSE

The purpose of this Finding of Suitability to Transfer (FOST) is to document the environmental suitability of property at the Major Robert Kirkwood United States Army Reserve (USAR) Center, located in Wilmington, Delaware, for transfer to the Delaware State University consistent with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h) and Department of Defense (DOD) policy. In addition, the FOST includes the CERCLA Access Provision and other Deed Provisions and the Environmental Protection Provisions (EPPs) necessary to protect human health or the environment after such transfer.

2. PROPERTY DESCRIPTION

The property consists of approximately 9.46 acres, which includes two permanent buildings: an Administration Building and Organizational Maintenance Shop (OMS). The property was previously used for administrative, training and logistical purposes and vehicle and equipment maintenance. The property is intended to be transferred for reuse as a university education and administrative facility and is consistent with the intended reuse of the property as set forth in the Delaware Redevelopment Authority's Reuse Plan. A site map of the property is attached (Enclosure 1).

3. ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property was made based upon an Environmental Condition of Property (ECP) Report prepared in April 2007 and supplemented by an ECP Update Report finalized in June 2012. The information provided is a result of a search of agency files during the development of these environmental surveys.

A list of documents providing information on environmental conditions of the property is attached (Enclosure 2).

4. ENVIRONMENTAL CONDITION OF PROPERTY

The DOD Environmental Condition of Property (ECP) categories for the property are as follows:

ECP Category 2: Major Robert Kirkwood USAR Center (DE005); entire parcel including all building structures.

A summary of the ECP category definitions is provided in Table 1 – Description of Property (Enclosure 3).

4.1. Environmental Investigation Sites

The following investigation sites are located on the property: 1) In November 1990, one 15,000-gallon heating oil tank was removed from the ground and minor contamination identified. Subsurface soil samples were collected and contained up to 126 parts per million (ppm) Total Petroleum Hydrocarbons (TPH), but less than 0.1 ppm Benzene, Toluene, Ethylbenzene, Xylenes (BTEX). Based on these results, the Delaware Department of Natural Resources and Environmental Control (DNREC) granted the release a No Further Action (NFA) status on February 15, 1991. 2) During a public hearing in 2006, one of the neighbors in attendance indicated that “approximately 30 years ago,” USAR buried 50-gallon barrels on the undeveloped northern portion of the Property. A circular area of discolored grass was observed in the northern portion of the Site, but a scientist with the 99th verified that the area is actually a patch of dormant Zoysia grass, a warm season grass that greens for only six months of the year. There is no basis for the claim of drum burial on the Property. No above or below ground disposal activities have occurred at the Property.

All environmental soil and/or groundwater investigation activities on the property have been completed.

4.2. Storage, Release, or Disposal of Hazardous Substances

There is no evidence that hazardous substances were stored, released or disposed of on the Property in excess of 40 CFR Part 373 reportable quantities. Refer to Section 3.3 of the 2007 ECP Report and Section 6.0 of the ECP Update Report for additional information. See Table 2 – Notification of Hazardous Substance Storage, Release, or Disposal (Enclosure 4).

4.3. Petroleum and Petroleum Products

4.3.1. Underground and Above-Ground Storage Tanks (UST/AST)

- **Current UST/AST Sites** - There are no current UST/AST sites at the Property.
- **Former UST/AST Sites** – No ASTs and two USTs have been removed from the Property: In November 1990, one 15,000-gallon heating oil tank was removed from the ground and minor contamination identified. Subsurface soil samples were collected and based on the results, the Delaware (DNREC) granted the release a NFA status on February 15, 1991. See Section 4.1 Environmental Investigation Sites for additional information. A 3,000-gallon heating oil UST was removed from the ground in May 1999. There is no evidence of a petroleum release from this site.

See Section 3.3 of the 2007 ECP Report for additional information. A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

4.3.2. Non-UST/AST Storage, Release, or Disposal of Petroleum Products

There is no evidence that non-UST/AST petroleum products in excess of 55 gallons were stored for one year or more on the property.

A summary of the UST/AST petroleum product activities is provided in Table 3 – Notification of Petroleum Products Storage, Release, or Disposal (Enclosure 5).

4.4. Polychlorinated Biphenyls (PCB)

The following electrical equipment is located on the property that was suspected to contain PCBs: One pad-mounted transformer located on the west side of the Administration Building and two pole-mounted transformers along the eastern boundary of the Property. This equipment is owned and operated by Delaware Electric Cooperative and has been determined not to be leaking.

4.5. Asbestos

There is asbestos-containing building material (ACBM) in the following buildings: Administrative Building and OMS. See Asbestos Visual Reinspection Survey (SBG Inc., 2012) for additional information (Enclosure 9).

The ACBM within the Administration Building includes: suspected ACBM in fire doors, which are in good condition, suspected non-friable roofing ACBM in the exterior of the building in good condition, friable mudded pipe insulation in the ceiling of room 148 in good condition, friable mudded pipe insulation in drop ceilings in hallway 101 in good condition, suspected non-friable chalkboards in rooms 125, 135, 153, 201A, 201B, 202A, 202B, 209, 217.

Suspected ACBM within the OMS includes: ACBM in fire doors in good condition and non-friable roofing materials in the exterior of the building in good condition.

Any remaining friable asbestos that has not been removed or encapsulated will not present an unacceptable risk to human health because the transferee assumes responsibility for abatement or management of any ACM in accordance with applicable federal, state, and local requirements. The deed will include an asbestos notice and covenant (Enclosure 7).

4.6. Lead-Based Paint (LBP)

The following buildings are known or presumed to contain lead-based paint (LBP): Administration Building and OMS. See Section 6.7 of the 2007 ECP Report for additional information. The property was not used for residential purposes and the transferee does not intend to use the property for residential purposes in the future. The deed will contain a lead-based paint notice and covenant.

4.7. Indoor Firing Ranges

The Administration Building is known to contain lead-contaminated dust from a former indoor firing range (IFR). Lead-contaminated dust was remediated to concentrations below 200 µg/ft² after the range was closed. See *Range Cleanup – DE005, 99th RSC, MAJ Robert Kirkwood U.S. Army Reserve Center*, dated March 2003 for additional information. The transferee does not intend to use the Administration Building as a child-occupied facility in the future. The deed will include a lead-contaminated dust warning and covenant (Enclosure 6).

4.8. Radiological Materials

There is no evidence that radioactive material or sources were stored or used on the property. On July 2, 2012, the Army completed a radiological survey of the Property in compliance with the accepted federal government protocol (MARSSIM Class 3). The Radiological Assessment Report found no evidence that radiological contamination or radioactive material was present and concluded that the Property can be considered non-impacted and available for unrestricted use relative to radioactive materials. On 2 July 2012, the U.S. Army Chief of Staff for Installations BRAC Deputy concluded the site is free of radiological concerns. See Enclosure 8 for additional information.

4.8. Radon

A radon survey was conducted from 1989 to 1990 at the USAR Center (specific buildings tested were not identified). Radon was not detected at above the EPA residential action level of 4.0 picocuries per liter (pCi/L) at the USAR Center. See Section 6.8 of the 2007 ECP Report for additional information.

4.9. Munitions and Explosives of Concern (MEC)

Based on a review of existing records and available information, there is no evidence that Munitions and Explosives of Concern (MEC) are present on the property. In addition the property has historically been used as an administrative and vehicle maintenance facility. The term “MEC” means military munitions that may pose unique explosives safety risks, including: (A) unexploded ordnance (UXO), as defined in 10 U.S.C. §101(e)(5); (B) discarded military munitions (DMM), as defined in 10 U.S.C. §2710(e)(2); or (C) munitions constituents (e.g., TNT, RDX), as defined in 10 U.S.C. §2710(e)(3), present in high enough concentrations to pose an explosive hazard.

4.10. Other Property Conditions

There are no other hazardous conditions on the property that present an unacceptable risk to human health and the environment.

5. ADJACENT PROPERTY CONDITIONS

The following other potentially hazardous conditions exist on adjacent property: The adjacent gas station, Dunlinden Citgo, located at 3927 Kirkwood Highway, has Leaking Underground Storage Tank (LUST) incidents associated with it. According to information obtained from the Delaware DNREC, this site has had four LUST incidents, but has received a NFA status for all four releases. Three of the incidents impacted soil only, while the fourth impacted groundwater involved several groundwater monitoring events. No free phase hydrocarbons were identified at this site and groundwater flow direction was determined towards the southeast (away from the USAR Center). The presence of these hazards on adjacent property does not present an unacceptable risk to human health and the environment because groundwater flow direction at this property has been determined away from the USAR Center and all petroleum releases have been granted a NFA status by the lead regulatory agency.

6. ENVIRONMENTAL REMEDIATION AGREEMENTS

There are no environmental remediation orders or agreements applicable to the property being transferred. The deed will include a provision reserving the Army's right to conduct remediation activities if necessary in the future (Enclosure 6).

7. REGULATORY/PUBLIC COORDINATION

The U.S. EPA Region 3, Delaware Department of Natural Resources and Environmental Control (DNREC), and the public were notified of the initiation of this FOST. Regulatory/public comments received during the public comment period will be reviewed and incorporated, as appropriate. A copy of the regulatory/public comments and the Army Response will be included at Enclosure 10.

8. NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) COMPLIANCE

The environmental impacts associated with the proposed transfer of the property have been analyzed in accordance with the National Environmental Policy Act (NEPA). The results of this analysis are documented in the Record of Environmental Consideration, September, 2012. There were no encumbrances or conditions identified in the NEPA analysis as necessary to protect human health or the environment.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the above information, I conclude that all removal or remedial actions necessary to protect human health and the environment have been taken and the property is transferable under CERCLA Section 120(h). In addition, all Department of Defense requirements to reach a finding of suitability to transfer have been met, subject to the terms and conditions set forth in the attached Environmental Protection Provisions that shall be included in the deed for the property. The deed will also include an Access Provision, enabling access in the event of a latent discovery of contamination caused by prior Department of Defense operations, and Other Deed Provisions.

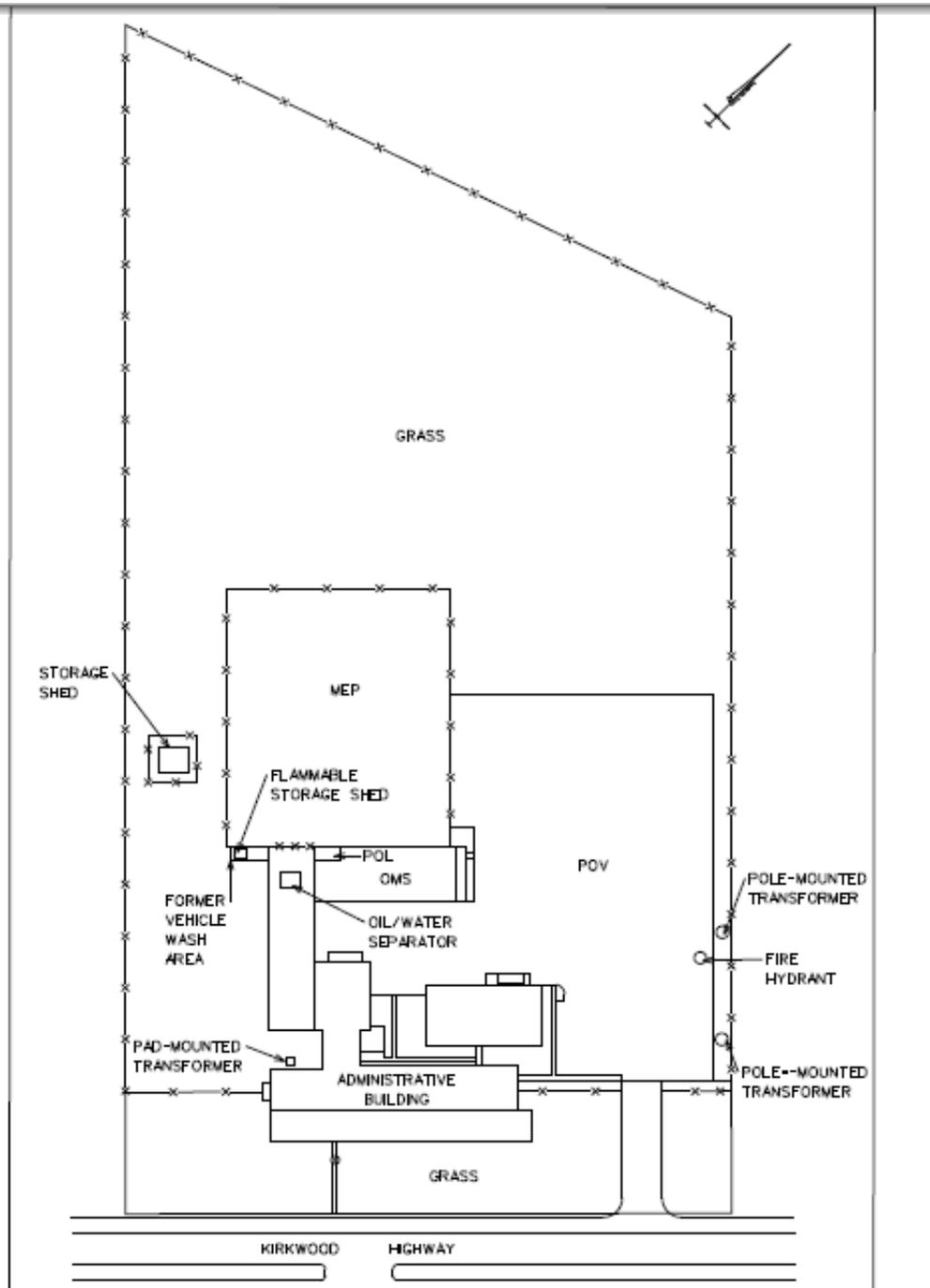
Tom Lederle
ACSIM-ODB Deputy

Date

8 Enclosures

- Encl 1 -- Site Map of Property
- Encl 2 -- Environmental Documentation
- Encl 3 -- Table 1 -- Description of Property
- Encl 4 -- Table 2 -- Notification of Hazardous Substance Storage, Release, or Disposal
- Encl 5 -- Table 3 -- Notification of Petroleum Product Storage, Release, or Disposal
- Encl 6 -- CERCLA Notice, Covenant and Access Provisions and Other Deed Provisions
- Encl 7-- Environmental Protection Provisions
- Encl 8 -- Radiological Survey
- Encl 9 -- Asbestos Visual Reinspection Report
- Encl 10 -- Regulatory/Public Comments and Army Response

**ENCLOSURE 1
SITE MAP OF PROPERTY**



*Source: 2007 ECP Report

ENCLOSURE 2

ENVIRONMENTAL DOCUMENTATION

Document	Source
Environmental Condition of Property Report for Major Robert Kirkwood U.S. Army Reserve Center (DE005), Wilmington, Delaware, prepared by CH2M Hill, April 2007	USACE
Environmental Condition of Property Update Report, Major Robert Kirkwood U.S. Army Reserve Center (DE005), Wilmington, Delaware, prepared by XCEL Engineering, Inc., June 2012	USACE
Range Cleanup – DE005, 99th RSC, MAJ Robert Kirkwood U.S. Army Reserve Center, Wilmington, Delaware, prepared by IT Corporation, March 2003	99th RSC
Record of Environmental Consideration, September 2012	99th RSC
Memorandum – Results from the Radiological Survey at the Major Robert Kirkwood U.S. Army Reserve Center (USARC) in Wilmington, Delaware, July 2, 2012	99th RSC
Asbestos Visual Reinspection Report, SBG Inc., July 2012	99 th RSC

ENCLOSURE 3

TABLE 1 – DESCRIPTION OF PROPERTY

Building Number and Property Description	Condition Category	Remedial Actions
The entire Parcel, including all buildings	2	None required. In November 1990, one 15,000-gallon heating oil tank was removed from the ground and minor contamination identified. Subsurface soil samples were collected and contained up to 126 parts per million (ppm) Total Petroleum Hydrocarbons (TPH), but less than 0.1 ppm Benzene, Toluene, Ethylbenzene, Xylenes (BTEX). Based on these results, the Delaware Department of Natural Resources and Environmental Control (DNREC) granted the release a No Further Action (NFA) status on February 15, 1991. Refer to Section 3.3 of the 2007 ECP Report for additional information.

- Category 1: Areas where no release or disposal of hazardous substances or petroleum products has occurred. (including no migration of these substances from adjacent areas)
- Category 2: Areas where only release or disposal of petroleum products has occurred.
- Category 3: Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.
- Category 4: Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken).

ENCLOSURE 4

TABLE 2 – NOTIFICATION OF HAZARDOUS SUBSTANCE STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Hazardous Substance(s)	Date of Storage, Release, or Disposal	Remedial Actions
The entire Parcel including all buildings.	No hazardous substances were stored, released or disposed of on the property in excess of 40 CFR Part 373 reportable quantities.	1955 to Present.	None required.
<p>* The information contained in this notice is required under the authority of regulations promulgated under section 120(h) of the Comprehensive Environmental Response, Liability, and Compensation Act (CERCLA or ‘Superfund’) 42 U.S.C. §9620(h). This table provides information on the storage of hazardous substances for one year or more in quantities greater than or equal to 1,000 kilograms or the hazardous substance’s CERCLA reportable quantity (which ever is greater). In addition, it provides information on the known release of hazardous substances in quantities greater than or equal to the substances CERCLA reportable quantity. See 40 CFR Part 373.</p>			

ENCLOSURE 5

TABLE 3 – NOTIFICATION OF PETROLEUM PRODUCT STORAGE, RELEASE, OR DISPOSAL

Building Number	Name of Petroleum Product(s)	Date of Storage, Release, or Disposal	Remedial Actions
USAR Center	Heating oil	1955 to 1990	None required. In November 1990, one 15,000-gallon heating oil tank was removed from the ground and minor contamination identified. Subsurface soil samples were collected and contained up to 126 parts per million (ppm) Total Petroleum Hydrocarbons (TPH), but less than 0.1 ppm Benzene, Toluene, Ethylbenzene, Xylenes (BTEX). Based on these results, the Delaware Department of Natural Resources and Environmental Control (DNREC) granted a No Further Action (NFA) status on February 15, 1991. Refer to Section 3.3 of the 2007 ECP Report for additional information.
USAR Center	Heating oil	1955 to 1999	None required. In May 1999, one 3,000-gallon heating oil tank was removed from the ground. No petroleum releases are associated with this tank.

ENCLOSURE 6

ACCESS PROVISIONS AND OTHER DEED PROVISIONS

The following Access Provisions along with the Other Deed Provisions, will be placed in the deed in a substantially similar form to ensure protection of human health and the environment and to preclude any interference with ongoing or completed remediation activities.

I. Access Rights:

The United States retains and reserves a perpetual and assignable easement and right of access on, over, and through the property, to enter upon the property in any case in which an environmental response or corrective action is found to be necessary on the part of the United States, without regard to whether such environmental response or corrective action is on the property or on adjoining or nearby lands. Such easement and right of access includes, without limitation, the right to perform any environmental investigation, survey, monitoring, sampling, testing, drilling, boring, coring, testpitting, installing monitoring or pumping wells or other treatment facilities, response action, corrective action, or any other action necessary for the United States to meet its responsibilities under applicable laws and as provided for in this instrument. Such easement and right of access shall be binding on the Grantee and its successors and assigns and shall run with the land.

In exercising such easement and right of access, the United States shall provide the Grantee or its successors or assigns, as the case may be, with reasonable notice of its intent to enter upon the property and exercise its rights under this clause, which notice may be severely curtailed or even eliminated in emergency situations. The United States shall use reasonable means to avoid and to minimize interference with the Grantee's and the Grantee's successors' and assigns' quiet enjoyment of the property. At the completion of work, the work site shall be reasonably restored. Such easement and right of access includes the right to obtain and use utility services, including water, gas, electricity, sewer, and communications services available on the property at a reasonable charge to the United States. Excluding the reasonable charges for such utility services, no fee, charge, or compensation will be due the Grantee, nor its successors and assigns, for the exercise of the easement and right of access hereby retained and reserved by the United States.

In exercising such easement and right of access, neither the Grantee nor its successors and assigns, as the case may be, shall have any claim at law or equity against the United States or any officer, employee, agent, contractor of any tier, or servant of the United States based on actions taken by the United States or its officers, employees, agents, contractors of any tier, or servants pursuant to and in accordance with this clause: Provided, however, that nothing in this paragraph shall be considered as a waiver by the Grantee and its successors and assigns of any remedy available to them under the Federal Tort Claims Act.

II. OTHER DEED PROVISIONS:

A. "AS IS"

a. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property and accepts the condition and state of repair of the subject Property. The Grantee understands and agrees that the Property and any part thereof is offered "AS IS" without any representation, warranty, or guaranty by the Grantor as to quantity, quality, title, character, condition, size, or kind, or that the same is in condition or fit to be used for the purpose(s) intended by the Grantee, and no claim for allowance or deduction upon such grounds will be considered.

b. No warranties, either express or implied, are given with regard to the condition of the Property, including, without limitation, whether the Property does or does not contain asbestos or lead-based paint. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos, lead-based paint, or other conditions on the Property. The failure of the Grantee to inspect or to exercise due diligence to be fully informed as to the condition of all or any portion of the Property offered, will not constitute grounds for any claim or demand against the United States.

c. Nothing in this "As Is" provision will be construed to modify or negate the Grantor's statutory obligations.

B. HOLD HARMLESS

a. To the extent authorized by law, the Grantee, its successors and assigns, covenant and agree to indemnify and hold harmless the Grantor, its officers, agents, and employees from (1) any and all claims, damages, judgments, losses, and costs, including fines and penalties, arising out of the violation of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed by the Grantee, its successors and assigns, and (2) any and all any and all claims, damages, and judgments arising out of, or in any manner predicated upon, exposure to asbestos, lead-based paint, or other condition on any portion of the Property after the date of conveyance.

b. The Grantee, its successors and assigns, covenant and agree that the Grantor shall not be responsible for any costs associated with modification or termination of the NOTICES, USE RESTRICTIONS, AND RESTRICTIVE COVENANTS in this Deed, including without limitation, any costs associated with additional investigation or remediation of asbestos, lead-based paint, or other condition on any portion of the Property.

c. Nothing in this Hold Harmless provision will be construed to modify or negate the Grantor's statutory obligations.

C. POST-TRANSFER DISCOVERY OF CONTAMINATION

a. If an actual or threatened release of a hazardous substance or petroleum product is discovered on the Property after the date of conveyance, Grantee, its successors or assigns, shall be responsible for such release or newly discovered substance unless Grantee is able to demonstrate that such release or such newly discovered substance was due to Grantor's activities, use, or ownership of the Property. If the Grantee, its successors or assigns believe the discovered hazardous substance is due to Grantor's activities, use or ownership of the Property, Grantee will immediately secure the site and notify the Grantor of the existence of the hazardous substances, and Grantee will not further disturb such hazardous substances without the written permission of the Grantor.

b. Grantee, its successors and assigns, as consideration for the conveyance of the Property, agree to release Grantor from any liability or responsibility for any claims arising solely out of the release of any hazardous substance or petroleum product on the Property occurring after the date of the delivery and acceptance of this Deed, where such substance or product was placed on the Property by the Grantee, or its successors, assigns, employees, invitees, agents or contractors, after the conveyance. This paragraph shall not affect the Grantor's responsibilities to conduct response actions or corrective actions that are required by applicable laws, rules and regulations.

D. ENVIRONMENTAL PROTECTION PROVISIONS

The Environmental Protection Provisions are at Enclosure 7, which is attached hereto and made a part hereof. The Grantee shall neither transfer the property, lease the property, nor grant any interest, privilege, or license whatsoever in connection with the property without the inclusion of the Environmental Protection Provisions contained herein, and shall require the inclusion of the Environmental Protection Provisions in all further deeds, easements, transfers, leases, or grant of any interest, privilege, or license.

ENCLOSURE 7

ENVIRONMENTAL PROTECTION PROVISIONS

The following conditions, restrictions, and notifications will be attached, in a substantially similar form, as an exhibit to the deed and be incorporated therein by reference in order to ensure protection of human health and the environment.

1. NOTICE OF THE PRESENCE OF ASBESTOS AND COVENANT

A. The Grantee is hereby informed and does acknowledge that friable and non-friable asbestos or asbestos-containing material (“ACM”) has been found on the Property. The Property may contain improvements, such as buildings, facilities, equipment, and pipelines, above and below the ground, that contain friable and non-friable asbestos or ACM. The Occupational Safety and Health Administration (OSHA) and the Environmental Protection Agency have determined that unprotected or unregulated exposure to airborne asbestos fibers increases the risk of asbestos-related diseases, including certain cancers that can result in disability or death.

B. The following buildings on the Property have been determined or are suspected to contain friable asbestos: Administration Building and Organization Maintenance Shop. The Grantee agrees to undertake any and all asbestos abatement or remediation in the aforementioned buildings that may be required under applicable law or regulation at no expense to the Grantor. The Grantor has agreed to transfer said buildings to the Grantee, prior to remediation or abatement of asbestos hazards, in reliance upon the Grantee’s express representation and covenant to perform the required asbestos abatement or remediation of those buildings.

C. The Grantee covenants and agrees that its use and occupancy of the Property will be in compliance with all applicable laws relating to asbestos. The Grantee agrees to be responsible for any remediation or abatement of asbestos found to be necessary on the Property to include ACM in or on buried pipelines that may be required under applicable law or regulation.

D. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its asbestos and ACM condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any asbestos or ACM hazards or concerns.

2. NOTICE OF THE PRESENCE OF LEAD-BASED PAINT (LBP) AND COVENANT AGAINST THE USE OF THE PROPERTY FOR RESIDENTIAL PURPOSE

A. The Grantee is hereby informed and does acknowledge that all buildings on the Property, which were constructed or rehabilitated prior to 1978, are presumed to contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Every purchaser of any interest in Residential Real Property on which a residential dwelling was built

prior to 1978 is notified that there is a risk of exposure to lead from lead-based paint that may place young children at risk of developing lead poisoning.

B. The Grantee covenants and agrees that it shall not permit the occupancy or use of any buildings or structures on the Property as Residential Property, as defined under 24 Code of Federal Regulations Part 35, without complying with this section and all applicable federal, state, and local laws and regulations pertaining to lead-based paint and/or lead-based paint hazards. Prior to permitting the occupancy of the Property where its use subsequent to sale is intended for residential habitation, the Grantee specifically agrees to perform, at its sole expense, abatement requirements under Title X of the Housing and Community Development Act of 1992 (Residential Lead-Based Paint Hazard Reduction Act of 1992).

C. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to its lead-based paint content and condition and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any lead-based paint hazards or concerns.

3. NOTICE AND COVENANT OF LEAD-CONTAMINATED DUST FROM FORMER USE AS AN INDOOR FIRING RANGE

The Administration Building on the Property was formerly used as an indoor firing range. Lead-contaminated dust was remediated, and confirmation sampling indicates lead concentrations below 200 $\mu\text{g}/\text{ft}^2$. The Grantee, its successors and assigns are hereby notified and acknowledge that additional lead-contaminated dust remediation may be necessary for a particular use or to comply with applicable law and required if the Administration Building will be used as a child-occupied facility, which includes, but is not limited to, day-care centers, preschools, kindergarten classrooms, and uses in which a child six years of age or under visits the facility more than two days within any week. All costs for any additional remediation for lead-contaminated dust shall be at the sole expense of the Grantee, its successors or assigns, and not the United States. Furthermore, the remediation of lead-contaminated dust inside buildings is not within the scope of releases that make a response action necessary under CERCLA Section 120(h)(3)(A).

4. PCB NOTIFICATION AND COVENANT

A. The Grantee is hereby informed and does acknowledge that equipment containing polychlorinated biphenyls (PCBs) may exist on the Property to be conveyed, described as follows: one pad-mounted transformer located on the west side of the Administration Building and two pole-mounted transformers along the eastern boundary of the Property. All transformers are owned by the electric utility provider and are *suspected* to contain PCB. Any PCB contamination or spills related to such equipment have been properly remediated prior to conveyance.

B. The Grantee covenants and agrees that its continued possession, use and management of any PCBs and PCB-containing equipment will be in compliance with all applicable laws relating to PCBs and PCB-containing equipment. The Grantee agrees to be responsible for any future

remediation of PCB contamination from PCB-containing equipment found to be necessary on the Property.

C. The Grantee acknowledges that it has inspected or has had the opportunity to inspect the Property as to the presence of PCBs and PCB-containing equipment and any hazardous or environmental conditions relating thereto. The Grantee shall be deemed to have relied solely on its own judgment in assessing the overall condition of all or any portion of the Property, including, without limitation, any PCB hazards or concerns.

5, NOTICE OF PESTICIDE APPLICATIONS

The GRANTEE is hereby notified and acknowledges that registered pesticides have been applied to the PROPERTY conveyed herein and may continue to be present thereon. The GRANTEE further acknowledges that where a pesticide was applied by the GRANTOR or at the GRANTOR's direction, the pesticide was applied in accordance with its intended purpose and consistently with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) (7 U.S.C. § 136, et seq.) and other applicable laws and regulations.

The GRANTEE covenants and agrees that if the GRANTEE takes any action with regard to the Property, including demolition of structures or any disturbance or removal of soil that may expose, or cause a release of, a threatened release of, or an exposure to, any such pesticide, GRANTEE assumes all responsibility and liability therefore.

ENCLOSURE 8
RADIOLOGICAL SURVEY



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIM-ODB

2 July 2012

MEMORANDUM FOR RECORD

SUBJECT: Results from the Radiological Survey at the Major Robert Kirkwood U.S. Army Reserve Center (USARC) in Wilmington, Delaware

1. On 2 July 2012, the final survey work for the radiological release at the Major Robert Kirkwood USARC was completed in compliance with the accepted federal government protocol (MARSSIM Class 3). The enclosed Radiological Survey Report provides an evaluation of radiological materials used and the summary of findings and results. The report concludes that no further action is required with respect to the radioactive devices or materials identified. The site is free of radiological concerns.
2. The point of contact for questions or comments is Mr. Hans Honerlah, Health Physicist, U.S. Army Corps of Engineers, Baltimore District, 410-962-4400, electronic mail hans.b.honerlah@usace.army.mil.

Encl


Thomas E. Lederle
Deputy Chief, ACSIM
BRAC Division

ENCLOSURE 9
ASBESTOS REINSPECTION REPORT

DRAFT

ASBESTOS INSPECTION REPORT



99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY

ROBERT KIRKWOOD
US ARMY RESERVE CENTER

WILMINGTON, DELAWARE

(USAR FACID: DE005 - SITE CODE: 10775)

August 2012

ASBESTOS INSPECTION REPORT



**KIRKWOOD US ARMY RESERVE CENTER
(DE005) - (10775)
3931 KIRKWOOD HIGHWAY
WILMINGTON, DELAWARE**

Submitted By



Small Business Group, Inc.
10179 Highway 78
Ladson, South Carolina 29456

Submitted to



United States Army Corps of Engineers
Savannah District

Prepared for



99TH REGIONAL SUPPORT COMMAND
UNITED STATES ARMY RESERVE
FORT DIX, NEW JERSEY



3 Terri Lane
Burlington, New Jersey
609-386-8800
Fax 609-386-7951

www.atcassociates.com

Full Asbestos Inspection



**US Army Reserve Center
3931 Kirkwood Highway
Wilmington, DE**

Prepared for:
**Mr. Mark Moltzen
SBG EEG
10179 Highway 78
Ladson, South Carolina 29456**

Prepared by:
**ATC Associates Inc.
3 Terri Lane
Burlington, New Jersey 08016**

ATC Project No. 063.43398.0001

August 2012



3 Terri Lane
Burlington, New Jersey 08016
www.atcassociates.com
609.386.8800
Fax 609.386.7951

August 20, 2012

Mark Moltzen
SBG EEG
10179 Highway 78
Ladson, SC 29456

RE: Full Asbestos Inspection
US Army Reserve Center
3931 Kirkwood Highway
Wilmington, Delaware
ATC Project #: 63.43398.0001

Dear Mr. Moltzen:

This report details the findings of the asbestos inspection performed by ATC Associates, Inc. (ATC) at the above referenced site.

Full Asbestos Inspection

The inspection and bulk sampling was performed by ATC between August 2 and August 7, 2012. The facility consists of two (2) buildings and an associated parking lot. Building 1 is an approximately 44,040 square-foot two-story administrative building with concrete block and masonry walls, metallic exterior siding and flat rubber coated roofs. Building 2 is an approximately 6,610 square-foot one-story maintenance shop with concrete block and masonry walls, and a flat rubber coated roof. According to the site contact, Mr. Christopher Huebler of Northwood Engineering, LLC, both buildings were constructed circa 1950. Mr. Huebler informed ATC that, to the best of his knowledge, the southern portion of Building 1 was constructed as an addition to the original building. The asbestos inspection included the sampling of interior and exterior suspect asbestos containing building materials (ACBM). Discreet locations of sampling were utilized and sampling that could destroy the integrity of the suspect materials were not sampled but assumed to contain asbestos. There may be asbestos containing pipe insulation enclosed within walls, pipe chases, crawl spaces not accessed and above permanent ceilings that would require partial demolition to access, but quantities of these materials were estimated and included in the Room by Room List of ACBM or PACM. The inspection was conducted per state and federal regulations.

Summary of Asbestos Results:

All bulk samples of suspect Asbestos Containing Material were submitted for analysis by polarized light microscopy (PLM) EPA method as defined in Perkins, R.L. and B. W. Harvey, July 1993: "Method for the Determination of Asbestos in Bulk Material" 61 pp. (EPA/600/R-93/116). This analysis method meets the requirements of the US EPA. Please refer to the Asbestos Laboratory Results for more details (**Appendix D**). Photos and the photo log of homogenous materials sampled and assumed can be found as **Appendix F**.

An asbestos-containing material (ACM) is defined by the Asbestos Hazardous Emergency Response Act (AHERA) as any material or product which contains more than one percent (>1%) asbestos. Building Materials identified to contain an asbestos content greater than 1% from this inspection included Thermal

Mr. Mark Moltzen
August 20, 2012

Systems Insulation (TSI) Mudded Pipe Fittings (HB-37). Additionally, 9"x9" Grey Floor Tiles (HB-38) were identified to contain trace amounts (less than 1%) of asbestos.

Building Materials presumed to contain asbestos from this inspection include the following:

- Roofing materials and associated adhesives
- Fire doors
- Chalkboards

Photos and the photo log of homogenous materials sampled and assumed can be found as **Appendix F**.

Please refer to the listing of known and presumed suspect asbestos containing materials (**Appendix A**), room by room list of asbestos containing material (**Appendix B**) for details concerning further material description, location, condition, potential for disturbance and approximate quantities of ACBM and PACM identified in this inspection. Please refer to the Asbestos Location Diagram (**Appendix C**) and Asbestos Laboratory Results for more details (**Appendix D**).

RECOMMENDATIONS

- Prior to any renovations/demolition to the buildings, any asbestos containing materials that may be disturbed must be removed or abated as required (per State and Federal regulations).
- Suspect ACM that was not sampled during this inspection should be tested prior to disturbance. Inaccessible areas and materials should be surveyed (via selective demo if needed) prior to the start of renovation activities to appropriately determine the extent of necessary abatement.
- Asbestos abatement activities must be performed by State certified abatement contractor following all applicable State and Federal regulations. Abatement activities should be designed by an EPA certified asbestos project designer and overseen by an EPA certified asbestos project monitor.
- PLM analysis has proven to be unreliable in determining asbestos content in non-friable organically bound (NOB) materials, including floor tile and mastics. ATC recommends that NOB materials that returned negative results be retested using Transmission Electron Microscopy (TEM) for asbestos contents confirmation.

Appendix E contains the appropriate ATC certifications. Thank you for selecting ATC Associates, Inc. for your environmental management needs. If you have any questions please do not hesitate to call us at (609) 386-8800.

Sincerely,

ATC ASSOCIATES, INC.



Darren K.J. Townsend
Environmental Technician



Brian Kearney
Manager, Building Sciences Division

Appendix A

List of Suspect Asbestos Containing Building Materials

LIST OF CONFIRMED AND PRESUMED ACBM

ACBM

ATC's bulk sampling identified the following ACBM at the facility:

Building 1:

- Thermal Systems Insulation (TSI) – Mudded Pipe Fittings (HB-37)

Building 2:

The laboratory analysis of bulk samples did not identify any ACBM in Building 2.

PACM

ATC identified the following presumed ACM:

Building 1:

- Roofing materials and associated adhesives (HB-43)*
- Fire doors (HB-42)
- Chalkboards (HB-44)

Building 2:

- Roofing materials and associated adhesives (HS-17)*
- Fire doors (HS-16)

* Based upon communications with Mr. Heubler, it is unknown whether original roofing materials are located underneath the rubber coated roofs at Building 1 and 2. As such, both roofs are considered suspect ACM.

Appendix B

Room by Room List of ACBM and PACM

US Army Reserve Center
3931 Kirkwood Highway, Wilmington, Delaware
Room by Room List of ACBM or PACM
ATC Project #63.43398.0001
Page 1 of 2

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
General Interior						
Doors	HB-42*	Fire Doors	Miscellaneous Non-Friable	117 units	Good	Low Potential
Exterior						
Roof	HS-43*	Roofing Materials	Miscellaneous Non-Friable	28,060 SF	Good	Low Potential
Room 148						
Ceiling	HB-37	Mudded Pipe Insulation	TSI Friable	5 LF	Good	Potential for Damage
Hallway 101						
Above Dropped Ceiling	HB-37	Mudded Pipe Insulation	TSI Friable	4 LF	Good	Low Potential
Room 153						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	2 units	Good	Low Potential
Room 125						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	2 units	Good	Low Potential
Room 135						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	2 units	Good	Low Potential
Room 217						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	2 units	Good	Low Potential
Room 209						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	2 units	Good	Low Potential

* Indicates materials presumed to contain asbestos.

Good - No Damage

Damaged - Less than 10% evenly distributed or less than 25% localized

Significantly Damaged - Greater than 10% evenly distributed or greater than 25% localized

US Army Reserve Center
3931 Kirkwood Highway, Wilmington, Delaware
Room by Room List of ACBM or PACM
ATC Project #63.43398.0001
Page 2 of 2

BUILDING 1

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Room 202A						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Room 202B						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Room 201A						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	1 unit	Good	Low Potential
Room 201B						
Walls	HB-44*	Chalkboards	Miscellaneous Non-Friable	1 unit	Good	Low Potential

* Indicates materials presumed to contain asbestos.

Good - No Damage

Damaged - Less than 10% evenly distributed or less than 25% localized

Significantly Damaged - Greater than 10% evenly distributed or greater than 25% localized

US Army Reserve Center
3931 Kirkwood Highway, Wilmington, Delaware
Room by Room List of ACBM or PACM
ATC Project #63.43398.0001
Page 1 of 1

BUILDING 2

<u>Location</u>	<u>Homogenous Material</u>	<u>Description</u>	<u>Type of ACBM</u>	<u>Approximate Quantity</u>	<u>Condition</u>	<u>Potential for Disturbance</u>
Maintenance Shop						
Interior						
Doors	HS-16*	Fire Doors	Miscellaneous Non-Friable	9 units	Good	Low Potential
Exterior						
Roof	HS-17*	Roofing Materials	Miscellaneous Non-Friable	6,610 SF	Good	Low Potential

* Indicates materials presumed to contain asbestos.

Good - No Damage

Damaged - Less than 10% evenly distributed or less than 25% localized

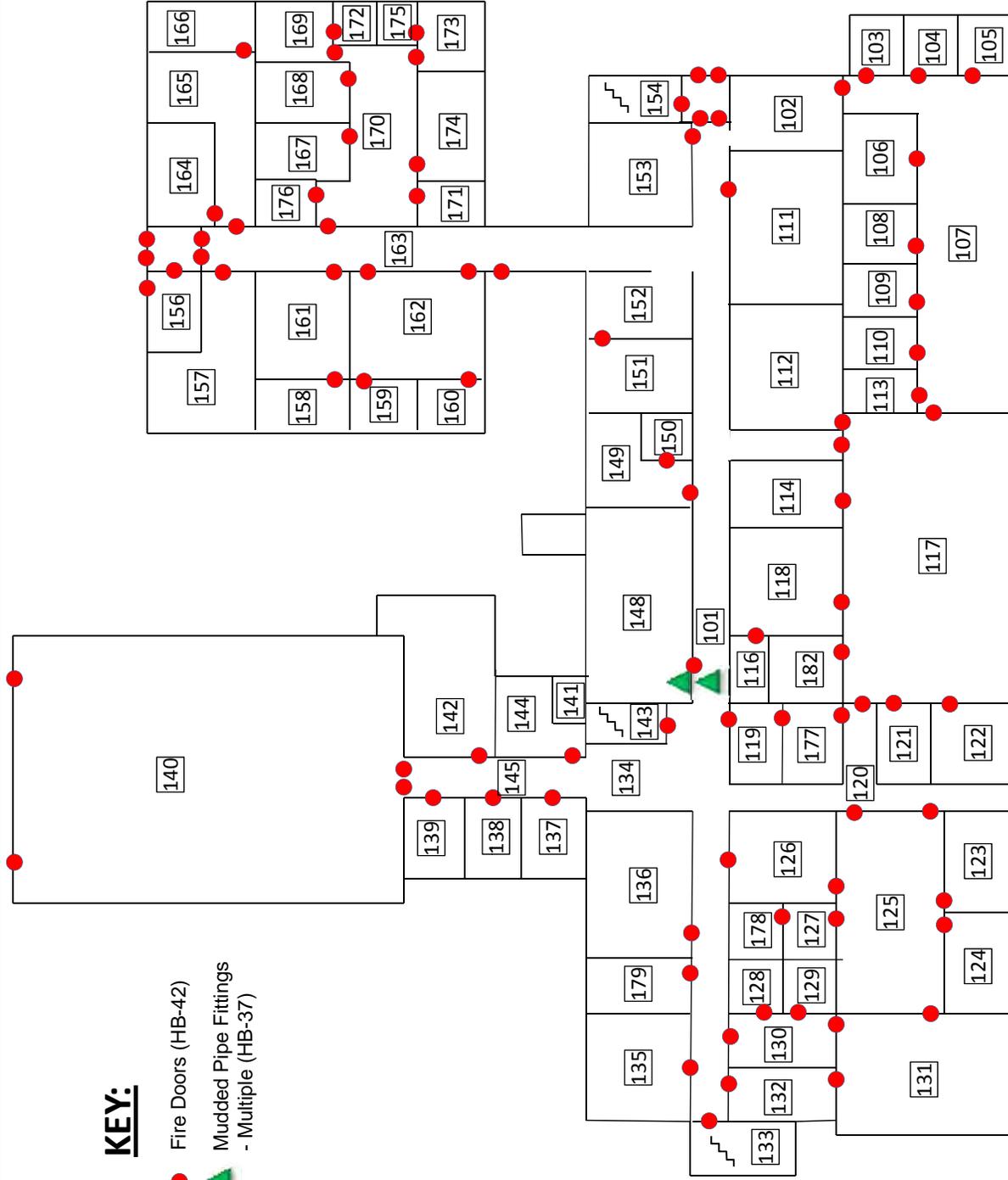
Significantly Damaged - Greater than 10% evenly distributed or greater than 25% localized

Appendix C

Asbestos Location Diagrams and Sampling Diagrams

KEY:

- Fire Doors (HB-42)
- ▲ Mudded Pipe Fittings - Multiple (HB-37)



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Wilmington, Delaware
ATC Project #: 63.43398.0001

FIGURE 1:
ACBM and PACM LOCATIONS
BUILDING 1 - FIRST FLOOR

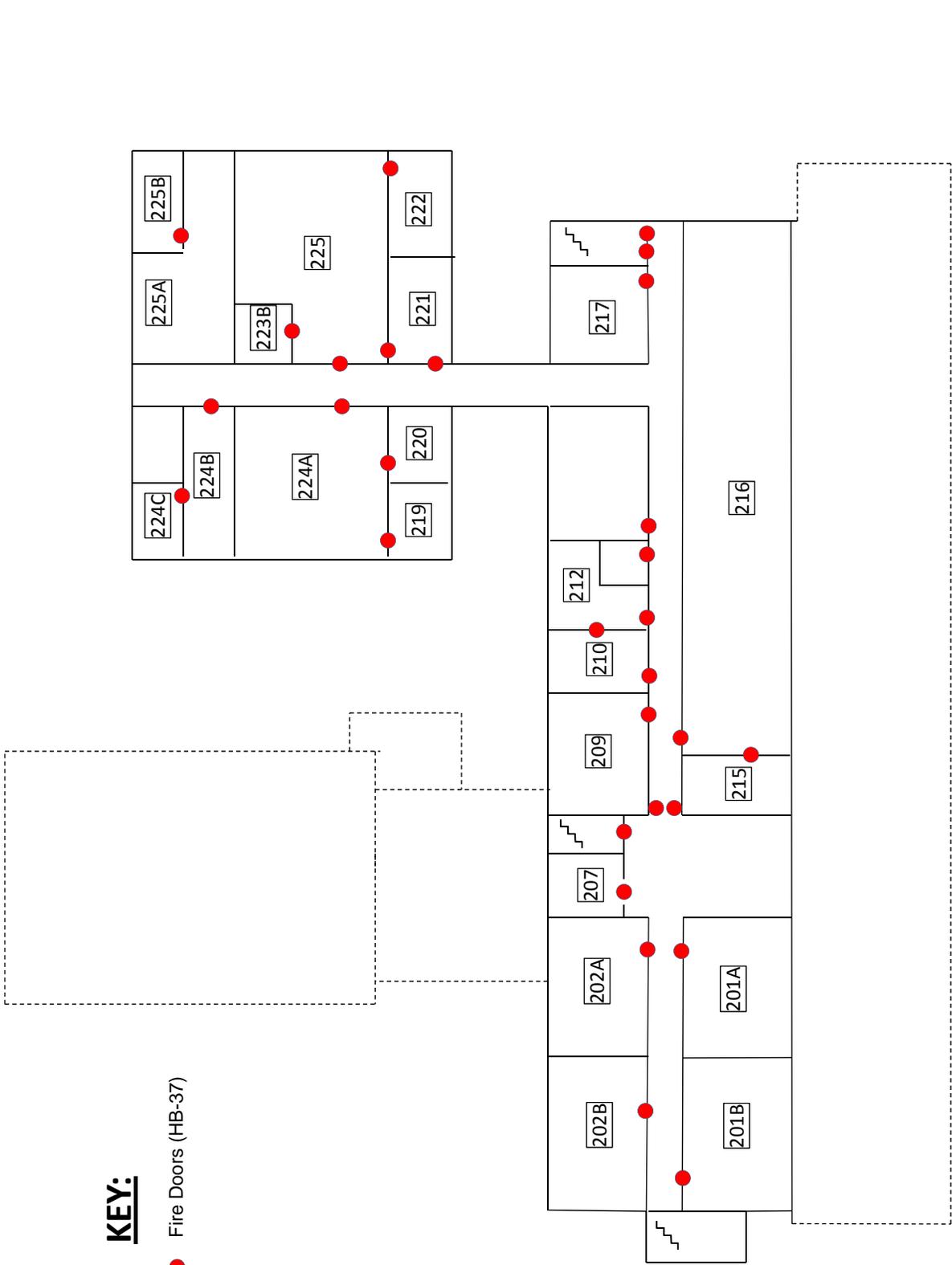
SCALE:
NOT TO SCALE



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

KEY:

● Fire Doors (HB-37)



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3931 Kirkwood Highway
Wilmington, Delaware
ATC Project #: 63,43398.0001

**FIGURE 2:
PACM LOCATIONS
BUILDING 1 - SECOND FLOOR**

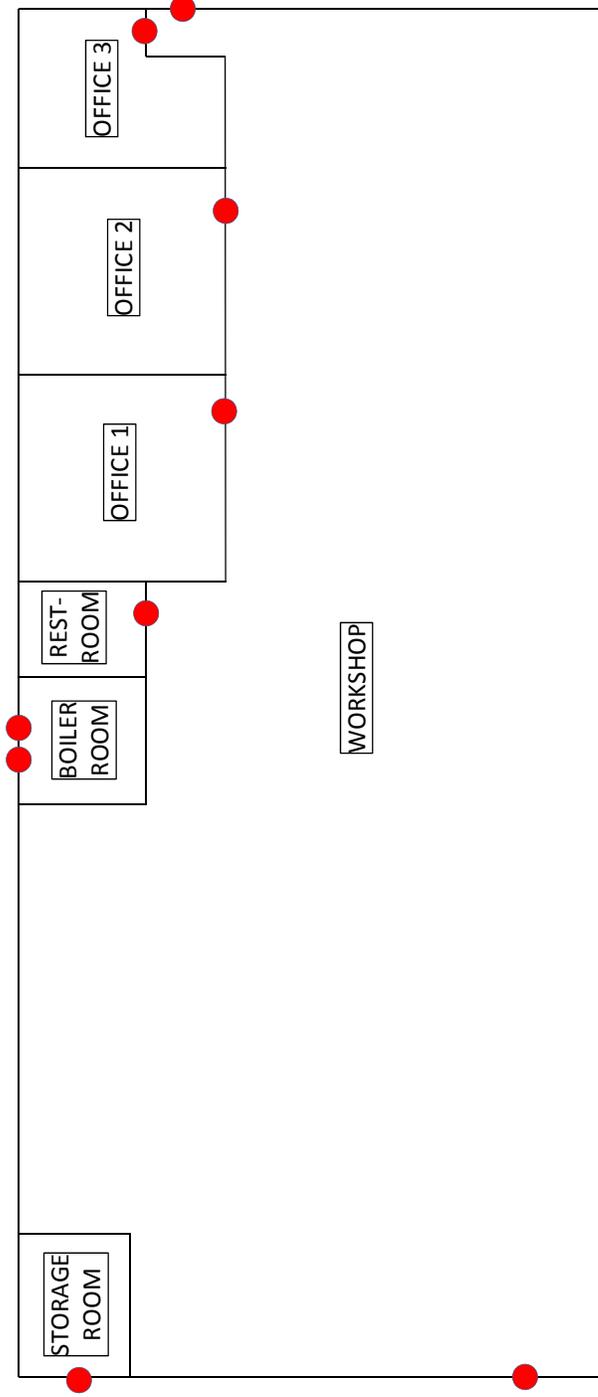
SCALE:
NOT TO SCALE



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

KEY:

● Fire Doors (HS-16)



US Army Reserve Center
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ATC Project #: 63.43398.0001

**FIGURE 3:
PACM LOCATIONS
MAINTENANCE SHOP**

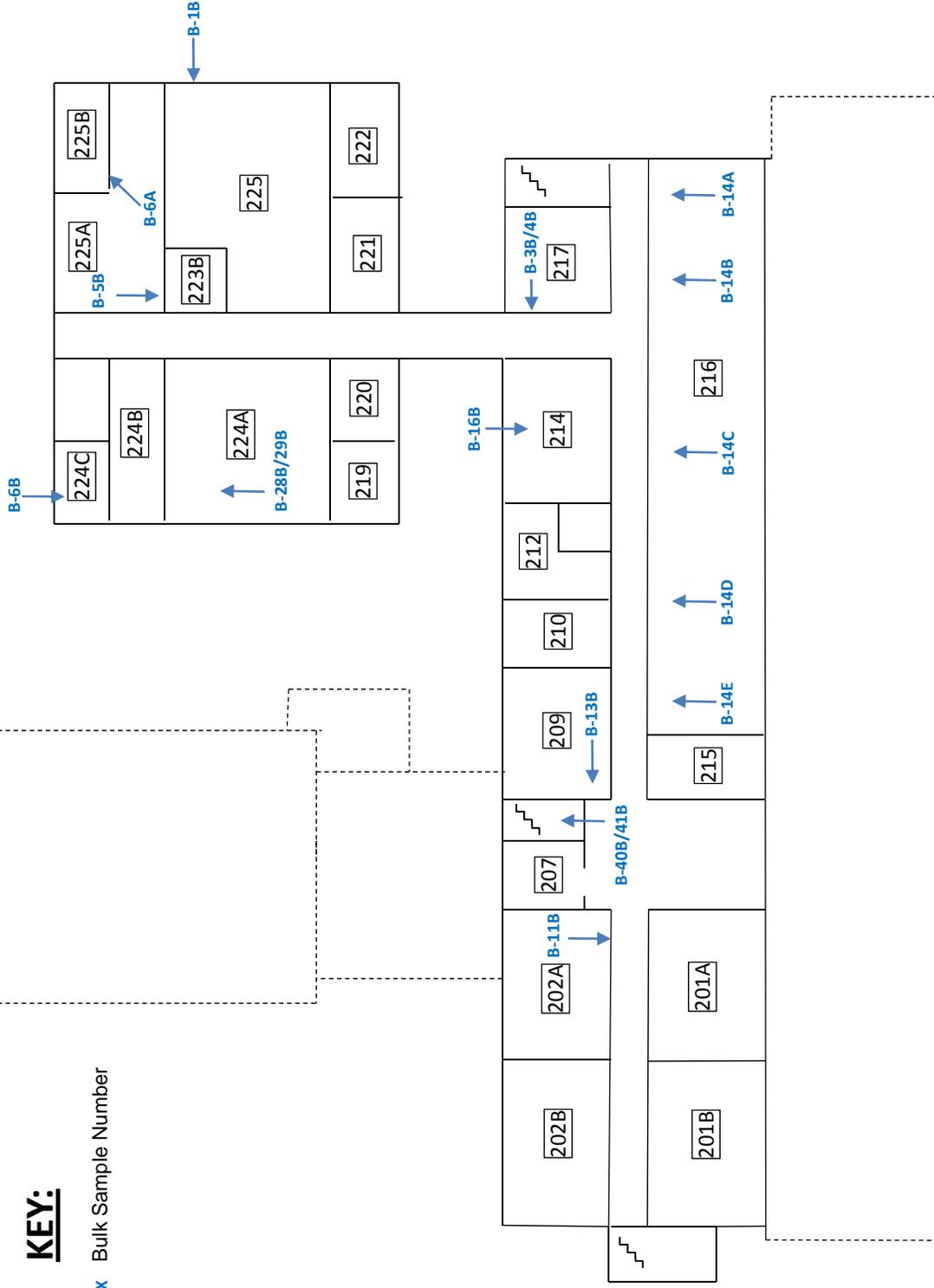
**SCALE:
NOT TO SCALE**



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

KEY:

B-X Bulk Sample Number



US Army Reserve Center
3931 Kirkwood Highway
Wilmington, Delaware
ATC Project #: 63,43398.0001

FIGURE 5:
BULK SAMPLING LOCATIONS
BUILDING 1 – SECOND FLOOR

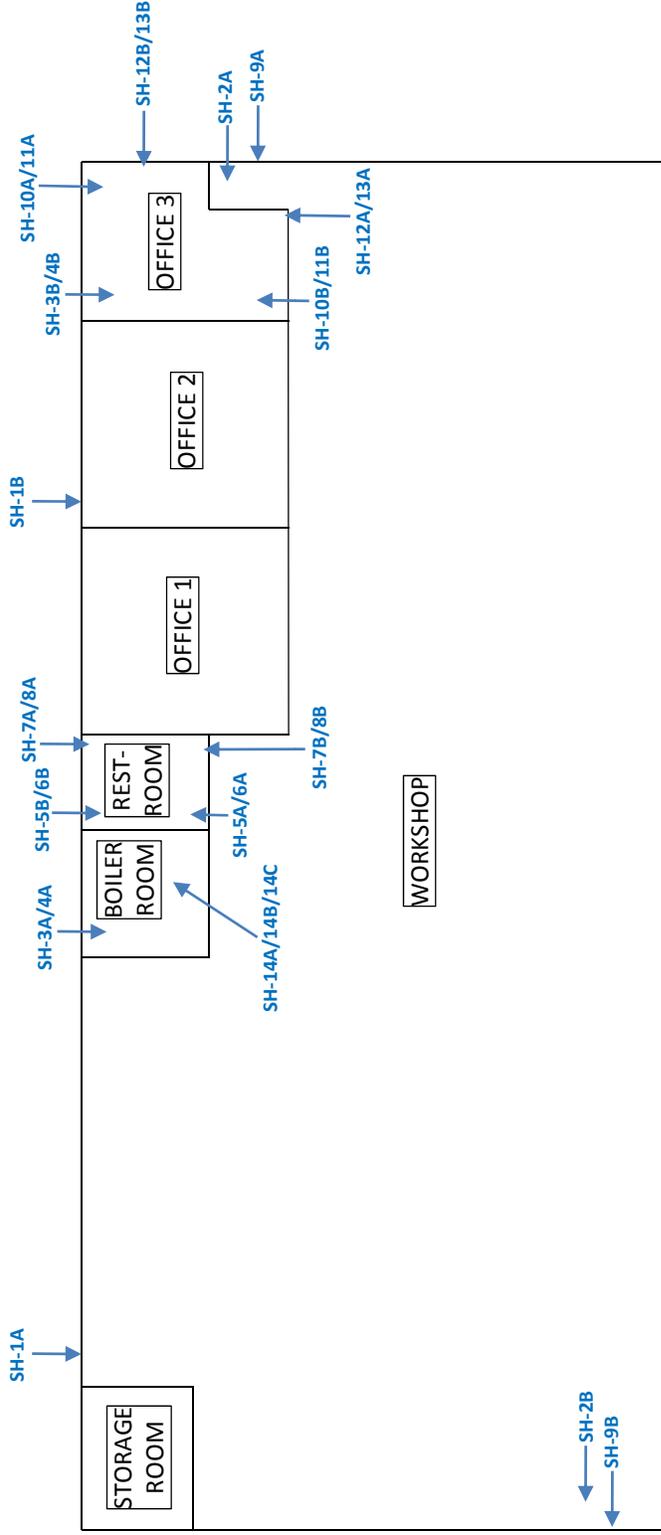
SCALE:
NOT TO SCALE



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

KEY:

SH-X Bulk Sample Number



US Army Reserve Center
3931 Kirkwood Highway
Wilmington, Delaware
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**FIGURE 6:
BULK SAMPLING LOCATIONS
MAINTENANCE SHOP**

**SCALE:
NOT TO SCALE**



ATC Associates Inc.
3 Terri Lane
Burlington, NJ 08016

Appendix D
Laboratory Results



ATC ASSOCIATES INC

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Client: ATC ASSOCIATES INC. - NEW JERSEY
THREE TERRI LANE
BURLINGTON, NJ 08016
Fax: (609) 386-7951 **Phone:** (609) 386-8800
Project: ARC NORTHEAST

Sample Date : 8/7/2012
Date Received : 8/9/2012
Date Analyzed : 8/10/2012
ATC Batch # 24541

Methods: EPA 600/M4-82-020
ELAP 198.1, 198.6 and 198.4

Location: ARC - WILMINGTON
Project # 68.43308.0001

Bulk Asbestos Analysis Results

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-1A	RM. 135 - WINDOW 3	WINDOW CAULKING (OLD)	PLM	Trace% Cellulose	20% Mineral Filler 80% Organic Binders		NONE DETECTED
24541 -1							
Analyzed By: Amr Fata			Color: GRAY	Comments: NOB recommended			
B-1B	RM. 225A - WINDOW 1	WINDOW CAULKING (OLD)	PLM	Trace% Cellulose	22% Mineral Filler 78% Organic Binders		NONE DETECTED
24541 -2							
Analyzed By: Amr Fata			Color: BLACK	Comments: NOB recommended			
B-2A	RM. 117 - WINDOW 2	WINDOW CAULKING (NEW)	PLM	Trace% Cellulose	25% Mineral Filler 75% Organic Binders		NONE DETECTED
24541 -3							
Analyzed By: Amr Fata			Color: BEIGE	Comments: NOB recommended			
B-2B	RM. 131 - WINDOW 1	WINDOW CAULKING (NEW)	PLM	Trace% Cellulose	23% Mineral Filler 77% Organic Binders		NONE DETECTED
24541 -4							
Analyzed By: Amr Fata			Color: BEIGE	Comments: NOB recommended			
B-3A	RM. 170	4" BLACK COVE BASE	PLM	Trace% Cellulose	36% Mineral Filler 64% Organic Binders		NONE DETECTED
24541 -5							
Analyzed By: Amr Fata			Color: BLACK	Comments: NOB recommended			
B-3B	RM. 217	4" BLACK COVE BASE	PLM	Trace% Cellulose	32% Mineral Filler 68% Organic Binders		NONE DETECTED
24541 -6							
Analyzed By: Amr Fata			Color: BLACK	Comments: NOB recommended			
B-4A	RM. 170	MASTIC ASSOC. W/4" BLACK COVE BASE	PLM	Trace% Cellulose	15% Mineral Filler 85% Organic Binders		NONE DETECTED
24541 -7							
Analyzed By: Amr Fata			Color: BROWN	Comments: NOB recommended			



ATC ASSOCIATES INC

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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-4B	RM. 217	MASTIC ASSOC. W/4" BLACK COVE BASE	PLM	Trace% Cellulose	12% Mineral Filler 88% Organic Binders		NONE DETECTED
24541 -8							
			Color: BROWN	Comments: NOB recommended			
B-5A	RM. 135 - CEILING	GYPSUM WALL BOARD (ORIGINAL)	PLM	10% Cellulose Trace% FiberGlass	90% Mineral Filler Trace% Paint		NONE DETECTED
24541 -9							
			Color: GRAY/BRN				
B-5B	RM. 225	GYPSUM WALL BOARD (ORIGINAL)	PLM	8% Cellulose 2% FiberGlass	90% Mineral Filler		NONE DETECTED
24541 -10							
			Color: GRAY/BRN				
B-6A	RM. 225 B	GYPSUM WALL BOARD - DIVIDING WALLS	PLM	7% Cellulose 3% FiberGlass	90% Mineral Filler		NONE DETECTED
24541 -11							
			Color: GRAY/BRN				
B-6B	RM. 224C	GYPSUM WALL BOARD - DIVIDING WALLS	PLM	8% Cellulose 4% FiberGlass	88% Mineral Filler		NONE DETECTED
24541 -12							
			Color: GRAY/BRN				
B-7A	RM. 109	BROWN MASTIC ASSOC. W/GRAY CARPET	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
24541 -13							
			Color: BROWN	Comments: NOB recommended			
B-7B	RM. 106	BROWN MASTIC ASSOC. W/GRAY CARPET	PLM	Trace% Cellulose	16% Mineral Filler 84% Organic Binders		NONE DETECTED
24541 -14							
			Color: BROWN	Comments: NOB recommended			
B-8A	RM. 122	12"X12" VFT - LIGHT GRAY MARBLED	PLM		49% Mineral Filler 51% Organic Binders		NONE DETECTED
24541 -15							
			Color: LT.GRAY	Comments: NOB recommended			
B-8B	RM. 136	12"X12" VFT - LIGHT GRAY MARBLED	PLM		53% Mineral Filler 47% Organic Binders		NONE DETECTED
24541 -16							
			Color: LT.GRAY	Comments: NOB recommended			
B-9A	RM. 122	MASTIC ASSOC. W/12"X12" VFT - LIGHT GRAY MARBLED	PLM		8% Mineral Filler 92% Organic Binders		NONE DETECTED
24541 -17							
			Color: BROWN	Comments: NOB recommended			



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-9B	RM. 136	MASTIC ASSOC. W/12"X12" VFT - LIGHT GRAY MARBLED	PLM		10% Mineral Filler 90% Organic Binders		NONE DETECTED
24541 -18							
			Color: BROWN	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-10A	RM. 108	BROWN MASTIC W/BROWN CARPET	PLM	Trace% Cellulose	20% Mineral Filler 80% Organic Binders		NONE DETECTED
24541 -19							
			Color: BROWN	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-10B	RM. 104	BROWN MASTIC W/BROWN CARPET	PLM	Trace% Cellulose	22% Mineral Filler 78% Organic Binders		NONE DETECTED
24541 -20							
			Color: BROWN	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-11A	HALLWAY 101 - WEST END DOOR	DOOR CAULKING - OLD	PLM	Trace% Cellulose	22% Mineral Filler 78% Organic Binders		NONE DETECTED
24541 -21							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-11B	RM. 202A - DOOR	DOOR CAULKING - OLD	PLM	Trace% Cellulose	26% Mineral Filler 74% Organic Binders		NONE DETECTED
24541 -22							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-12A	RM. 117	DOOR CAULKING - NEW	PLM	Trace% Cellulose	29% Mineral Filler 71% Organic Binders		NONE DETECTED
24541 -23							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-12B	EM. 131	DOOR CAULKING - NEW	PLM	Trace% Cellulose	30% Mineral Filler 70% Organic Binders		NONE DETECTED
24541 -24							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-13A	RM. 171	2'X2' CT - SPECKLED	PLM	33% Cellulose 30% FiberGlass	37% Mineral Filler		NONE DETECTED
24541 -25							
			Color: GRAY	Trace% Paint			
Analyzed By: Amr Fata							
B-13B	RM. 209	2'X2' CT - SPECKLED	PLM	36% Cellulose 34% FiberGlass	30% Mineral Filler		NONE DETECTED
24541 -26							
			Color: GRAY	Trace% Paint			
Analyzed By: Amr Fata							
B-14A	RM. 216 - EAST CEILING	FIBERED WAL SURJOINING	PLM	15% Cellulose	30% Mineral Filler 55% Organic Binders		NONE DETECTED
24541 -27							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							



ATC ASSOCIATES INC
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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-14B	RM. 216 - EAST CEILING	FIBERED WAL SURJOINING	PLM	20% Cellulose	30% Mineral Filler 50% Organic Binders		NONE DETECTED
24541 -28							
			Color: GRAY	Comments: NOB recommended			
B-15A	RM. 155 - MEN'S W/C	2'X2' CT - PLAIN	PLM	6% Cellulose 2% FiberGlass	92% Mineral Filler		NONE DETECTED
24541 -29							
			Color: LT.GRAY				
B-15B	RM. 155 - MEN'S W/C	2'X2' CT - PLAIN	PLM	7% Cellulose 1% FiberGlass	92% Mineral Filler		NONE DETECTED
24541 -30							
			Color: LT.GRAY				
B-16A	RM. 122 (WOMEN'S W/C)	BATHROOM CAULKING	PLM		14% Mineral Filler 86% Organic Binders		NONE DETECTED
24541 -31							
			Color: WHITE	Comments: NOB recommended			
B-16B	RM. 214 (MEN'S W/C)	BATHROOM CAULKING	PLM		17% Mineral Filler 83% Organic Binders		NONE DETECTED
24541 -32							
			Color: WHITE	Comments: NOB recommended			
B-17A	RM. 170	12"X12" VFT - GRAY W/BLACK & WHITE SPOTS	PLM		51% Mineral Filler 49% Organic Binders		NONE DETECTED
24541 -33							
			Color: GRAY/BLACK	Comments: NOB recommended			
B-17B	RM. 117	12"X12" VFT - GRAY W/BLACK & WHITE SPOTS	PLM		53% Mineral Filler 47% Organic Binders		NONE DETECTED
24541 -34							
			Color: GRAY/BLACK	Comments: NOB recommended			
B-18A	RM. 170	MASTIC ASSOC. W/12"X12" VFT - GRAY W/BLACK & WHITE SPOTS	PLM	Trace% Cellulose	20% Mineral Filler 80% Organic Binders		NONE DETECTED
24541 -35							
			Color: BLACK	Comments: NOB recommended			
B-18B	RM. 117	MASTIC ASSOC. W/12"X12" VFT - GRAY W/BLACK & WHITE SPOTS	PLM	Trace% Cellulose	17% Mineral Filler 83% Organic Binders		NONE DETECTED
24541 -36							
			Color: BLACK	Comments: NOB recommended			
B-19A	RM. 108	4" BROWN COVE BASE	PLM		36% Mineral Filler 64% Organic Binders		NONE DETECTED
24541 -37							
			Color: BROWN	Comments: NOB recommended			



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-19B	RM. 104	4" BROWN COVE BASE	PLM		40% Mineral Filler 60% Organic Binders		NONE DETECTED
24541 -38							
			Color: BROWN	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-20A	RM. 108	MASTIC ASSOC. W/4" BROWN COVE BASE	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
24541 -39							
			Color: BEIGE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-20B	RM. 104	MASTIC ASSOC. W/4" BROWN COVE BASE	PLM	Trace% Cellulose	15% Mineral Filler 85% Organic Binders		NONE DETECTED
24541 -40							
			Color: BEIGE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-21A	RM. 142 (KITCHEN)	JOINT COMPOUND - ORIGINAL	PLM		100% Mineral Filler		NONE DETECTED
24541 -41							
			Color: WHITE	Trace% Paint			
Analyzed By: Amr Fata							
B-21B		JOINT COMPOUND - ORIGINAL	PLM		100% Mineral Filler		NONE DETECTED
24541 -42							
			Color: WHITE	Trace% Paint			
Analyzed By: Amr Fata							
B-22A	RM. 117 - BY FURNACE	GYPSUM WALL BOARD - NEW	PLM	Trace% Cellulose	100% Mineral Filler		NONE DETECTED
24541 -43							
			Color: WHITE	Trace% Paint			
Analyzed By: Amr Fata							
B-22B	RM. 117 - BY FURNACE	GYPSUM WALL BOARD - NEW	PLM	Trace% Cellulose	100% Mineral Filler		NONE DETECTED
24541 -44							
			Color: WHITE	Trace% Paint			
Analyzed By: Amr Fata							
B-23A	RM. 117 - BY FURNACE	JOINT COMPOUND - NEW	PLM		100% Mineral Filler		NONE DETECTED
24541 -45							
			Color: WHITE				
Analyzed By: Amr Fata							
B-23B	RM. 117 - BY FURNACE	JOINT COMPOUND - NEW	PLM		100% Mineral Filler		NONE DETECTED
24541 -46							
			Color: WHITE				
Analyzed By: Amr Fata							
B-14C	CENTERAL CEILING - RM. 216	FIBRED WALL SURJOINING	PLM	20% Cellulose	30% Mineral Filler 50% Organic Binders		NONE DETECTED
24541 -47							
			Color: GRAY	Comments: NOB recommended			
Analyzed By: Amr Fata							



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-14D	RM. 216 - WEST CEILING	FIBRED WALL SURJOINING	PLM	22% Cellulose	32% Mineral Filler 46% Organic Binders		NONE DETECTED
24541 -48							
		Color: GRAY		Comments: NOB recommended			
B-14E	RM. 216 - WEST CEILING	FIBRED WALL SURJOINING	PLM	18% Cellulose	32% Mineral Filler 50% Organic Binders		NONE DETECTED
24541 -49							
		Color: GRAY		Comments: NOB recommended			
B-24A	RM. 153 - UNDER CARPET	12"x12" VFT - PINK/ORANGE MARBLED	PLM	Trace% Cellulose	53% Mineral Filler 47% Organic Binders		NONE DETECTED
24541 -50							
		Color: PINK/ORANGE		Comments: NOB recommended			
B-24B	RM. 119 - UNDER B-8	12"x12" VFT - PINK/ORANGE MARBLED	PLM	Trace% Cellulose	51% Mineral Filler 49% Organic Binders		NONE DETECTED
24541 -51							
		Color: PINK/ORANGE		Comments: NOB recommended			
B-25A	RM. 153 - UNDER CARPET	BLACK MASTIC ASSOC. W/12"x12" VFT - PINK/ORANGE MARBLED	PLM	Trace% Cellulose	10% Mineral Filler 90% Organic Binders		NONE DETECTED
24541 -52							
		Color: BLACK		Comments: NOB recommended			
B-25B	RM. 119 - UNDER B-8	BLACK MASTIC ASSOC. W/12"x12" VFT - PINK/ORANGE MARBLED	PLM	Trace% Cellulose	12% Mineral Filler 88% Organic Binders		NONE DETECTED
24541 -53							
		Color: BLACK		Comments: NOB recommended			
B-26A	EAST - HALLWAY 101 - BY RM. 153	12"x12" VFT - GRAY W/BLACK STRIPS	PLM		54% Mineral Filler 46% Organic Binders		NONE DETECTED
24541 -54							
		Color: GRAY		Comments: NOB recommended			
B-26B	HALLWAY 101 - WEST - BY RM. 136	12"x12" VFT - GRAY W/BLACK STRIPS	PLM		51% Mineral Filler 49% Organic Binders		NONE DETECTED
24541 -55							
		Color: GRAY		Comments: NOB recommended			
B-27A	HALLWAY 101 - BY RM. 153	MASTIC ASSOC. W/12"x12" VFT - GRAY W/BLACK STRIPES	PLM	Trace% Cellulose	10% Mineral Filler 90% Organic Binders		NONE DETECTED
24541 -56							
		Color: BLACK		Comments: NOB recommended			
B-27B	HALLWAY 101 - WEST - BY ROOM 136	MASTIC ASSOC. W/12"x12" VFT - GRAY W/BLACK STRIPES	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
24541 -57							
		Color: BLACK		Comments: NOB recommended			



ATC ASSOCIATES INC

104 E. 25th Street, 10th Floor

New York, NY 10010

Tel. 212-353-8280

Fax: 212-353-8306

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-28A	ROOM 161 (UNDER B-8)	12"x12" VFT - BEIGE / YELLOW	PLM		52% Mineral Filler 48% Organic Binders		NONE DETECTED
24541 -58							
			Color: BEIGE/YL.	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-28B	RM. 224A	12"x12" VFT - BEIGE / YELLOW	PLM		55% Mineral Filler 45% Organic Binders		NONE DETECTED
24541 -59							
			Color: BEIGE/YL.	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-29A	RM. 161 (UNDER B-8)	MASIC ASSOC. W/12"x12" VFT - BEIGE / YELLOW	PLM	Trace% Cellulose	10% Mineral Filler 90% Organic Binders		NONE DETECTED
24541 -60							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-29B	RM. 224A	MASIC ASSOC. W/12"x12" VFT - BEIGE / YELLOW	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
24541 -61							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-30A	ROOM 176 (UNDER B-8)	12"x12" VFT - BLUE MARBLED	PLM	Trace% Cellulose	51% Mineral Filler 49% Organic Binders		NONE DETECTED
24541 -62							
			Color: BLUE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-30B	RM. 105 (UNDER B-8)	12"x12" VFT - BLUE MARBLED	PLM	Trace% Cellulose	53% Mineral Filler 47% Organic Binders		NONE DETECTED
24541 -63							
			Color: BLUE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-31A	RM. 176 (UNDER B0-8)	MASTIC ASSOC. W/12"x12" VFT - BLUE MARBLED	PLM	Trace% Cellulose	8% Mineral Filler 92% Organic Binders		NONE DETECTED
24541 -64							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-31B	RM. 105 (UNDER B-8)	MASTIC ASSOC. W/12"x12" VFT - BLUE MARBLED	PLM	Trace% Cellulose	11% Mineral Filler 89% Organic Binders		NONE DETECTED
24541 -65							
			Color: OFF-WHITE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-32A	ROOM 172	RESILENT VINYL FLOORING - WHITE BRICK STYLE	PLM	Trace% Cellulose	40% Mineral Filler 60% Organic Binders		NONE DETECTED
24541 -66							
			Color: OFF-WHITE	Comments: NOB recommended			
Analyzed By: Amr Fata							
B-32B	ROOM 142 (KITCHEN)	RESILENT VINYL FLOORING - WHITE BRICK STYLE	PLM	Trace% Cellulose	36% Mineral Filler 64% Organic Binders		NONE DETECTED
24541 -67							
			Color: OFF-WHITE	Comments: NOB recommended			
Analyzed By: Amr Fata							



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
B-33A 24541 -68	RM. 172	MASTIC ASSOC. W/RESILENT VINYL FLOORING - WHITE BRICK STYLE	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
		Color: OFF-WHITE		Comments: NOB recommended			
B-33B 24541 -69	RM. 142 (KITCHEN)	MASTIC ASSOC. W/RESILENT VINYL FLOORING - WHITE BRICK STYLE	PLM	Trace% Cellulose	16% Mineral Filler 84% Organic Binders		NONE DETECTED
		Color: OFF-WHITE		Comments: NOB recommended			
B-34A 24541 -70	RM. 148 (BOILER RM.)	EXPANSION JOINT - FLOOR	PLM	4% Cellulose 6% FiberGlass	90% Mineral Filler		NONE DETECTED
		Color: BROWN					
B-34B 24541 -71	ROOM 148 (BOILER ROOM)	EXPANSION JOINT - FLOOR	PLM	5% Cellulose 5% FiberGlass	90% Mineral Filler		NONE DETECTED
		Color: BROWN					
B-35A 24541 -72	RM. 148 - BOILER RM. BY STAIRS	18" PIPE INSULATION - MUD	PLM	15% Cellulose	85% Mineral Filler		NONE DETECTED
		Color: GRAY					
B-35B 24541 -73	RM. 148 - BOILER RM. BY BOILER	18" PIPE INSULATION - MUD	PLM	10% Cellulose	90% Mineral Filler		NONE DETECTED
		Color: GRAY					
B-35C 24541 -74	RM. 148 - BOILER RM. BY BOILER	18" PIPE INSULATION - MUD	PLM	12% Cellulose	88% Mineral Filler		NONE DETECTED
		Color: GRAY					
B-36A 24541 -75	RM. 148 - BY STAIRS	PIPE INSULATION - CORRUGATED	PLM	90% Cellulose	10% Mineral Filler Trace% Organic Binders		NONE DETECTED
		Color: BROWN					
B-36B 24541 -76	RM. 132 - CORNER	PIPE INSULATION - CORRUGATED	PLM	88% Cellulose	12% Mineral Filler Trace% Organic Binders		NONE DETECTED
		Color: BROWN					
B-36C 24541 -77	HALLWAY 141	PIPE INSULATION - CORRUGATED	PLM	85% Cellulose	15% Mineral Filler Trace% Organic Binders		NONE DETECTED
		Color: BROWN					



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u>	<u>Asbestos</u>
				% Fibrous	% Non-Fibrous	% Type	% Type
B-37A	RM. 148 - BY STAIRS	PIPE ELBOW INSULATION MUD	PLM	3% Cellulose	30% Mineral Filler		67% Chrysotile
24541 -78		Color: LT.GRAY					
Analyzed By: Amr Fata						Total Asbestos: 67 %	
B-37B							NOT ANALYZED
24541 -79							
		Comments: Positive stop, see #37A					
B-37C							NOT ANALYZED
24541 -80							
		Comments: Positive stop, see #37A					
B-38A	RM. 135 - BY FIRE PL. UNDER B-8	9"X9" VFT - GRAY	PLM		54% Mineral Filler 46% Organic Binders		Trace Chrysotile
24541 -81		Color: GRAY					
Analyzed By: Amr Fata				Comments: NOB recommended		Total Asbestos: TRACE	
B-38B	RM. 135 - BY WINDOW	9"X9" VFT - GRAY	PLM		52% Mineral Filler 48% Organic Binders		Trace Chrysotile
24541 -82		Color: GRAY					
Analyzed By: Amr Fata				Comments: NOB recommended		Total Asbestos: TRACE	
B-39A	RM. 135 - BY FIRE PL. UNDER B-8	MASTIC ASSOC. W/ 9"X9" VFT - GRAY	PLM	Trace% Cellulose	15% Mineral Filler 85% Organic Binders		NONE DETECTED
24541 -83		Color: BLACK					
Analyzed By: Amr Fata				Comments: NOB recommended			
B-39B	RM. 135 - BY WINDOW	MASTIC ASSOC. W/ 9"X9" VFT - GRAY	PLM	Trace% Cellulose	17% Mineral Filler 83% Organic Binders		NONE DETECTED
24541 -84		Color: BLACK					
Analyzed By: Amr Fata				Comments: NOB recommended			
B-40A	HALLWAY 141 - UNDER B-8	VFT - BLACK 12"x12"	PLM		53% Mineral Filler 47% Organic Binders		NONE DETECTED
24541 -85		Color: BLACK					
Analyzed By: Amr Fata				Comments: NOB recommended			
B-40B	TOP OF CENTRAL STAIRWEL	VFT - BLACK 12"x12"	PLM		50% Mineral Filler 50% Organic Binders		NONE DETECTED
24541 -86		Color: BLACK					
Analyzed By: Amr Fata				Comments: NOB recommended			
B-41A	HALLWAY 141 - UNDER B-8	MASTIC ASSOC. W/9"X9" VFT - BLACK	PLM	Trace% Cellulose	12% Mineral Filler 88% Organic Binders		NONE DETECTED
24541 -87		Color: BROWN					
Analyzed By: Amr Fata				Comments: NOB recommended			



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Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u>	<u>Asbestos</u>
				% Fibrous	% Non-Fibrous	% Type	% Type
B-41B	TOP OF CENTRAL STAIRWALL	MASTIC ASSOC. W/9"X9" VFT - BLACK	PLM	Trace% Cellulose	16% Mineral Filler 84% Organic Binders		NONE DETECTED
24541 -88				Color: BROWN			
Analyzed By: Amr Fata				Comments: NOB recommended			

NOTES:

- 1) The Limit of Detection is the same as the Reporting Limit for these results.
- 2) The Reporting Limit (RL) is the Limit of Quantitation. For point counts the limit of quantitation of 0.25%; based on one asbestos point counter over 400 non-empty points.
- 3) Asbestos Containing Material (ACM) Definition: > 1% asbestos by weight is considered an ACM
- 4) Disclaimer: The laboratory is not responsible for sample collection. Please refer to enclosed letter. This report may not be reproduced, except in full, without written approval by ATC Associates Inc. This report may not be used to claim product endorsement by NVLAP or any other agency of the U.S. Government. This report relates only to the samples reported above as described in the chain of custody. Quality control data is available upon request.
- 5) Accredited by NVLAP #101187-0 and by NY State ELAP #10879
- 6) Confidentiality Notice: The document(s) contained herein are confidential and privileged information, intended for the exclusive use of the individual or entity named above.
- 7) Liability Notice: ATC Associates Inc. and its personnel shall not be liable for any misinformation provided to us by the client regarding these samples. This report relates only to samples submitted and analyzed.
- 8) When the results display more than three digits, only the first three are significant. The data within this report is reliable to 3 significant figures.
- 9) The condition of all samples was acceptable upon receipt.
- 10) The laboratory certifies that the test results meet all requirements of NELAC.
- 11) Supplement to test report batch # _____. Amendments: _____. Amendment Dates: _____. Amended by: _____
- 12) PLM Letter is attached on this report.
- 13) TRACE = LESS THAN LIMIT OF QUANTITATION (<0.25%)
- 14) ATC certifies that this report is an accurate and authentic report of the results obtained from the laboratory analysis
- 15) The uncertainty for these test results is available upon request.

Amr Fata

Analyst:

Milena Bonezzi 

Approved by
Laboratory Director:



①/7
 3 Terri Lane
 Burlington, NJ 08016
 www.atcassociates.com
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 Fax 609.386.7951

24541

Bulk Sample Chain of Custody			
Client:	ARC NORTHEAST	Samples Collected By:	D. TOWNSEND
Project #/Task:	68-43398-0001	Samples Transported By:	D. TOWNSEND
Facility:	ARC - WILMINGTON	Samples Received By:	ARC Jill Yang <i>Jill Yang</i>
Proj. Mgr.	BRIAN KEARNEY	Samples Analyzed By:	ARC A. <i>A. [unclear]</i>
		Date:	8-7-12
		Date:	8-8-12
		Date:	8/9/12 10:00 am
		Date:	8/16/12 11:57 PM

86 pm

Sample Turnaround Time:			
24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>
3 Days	<input checked="" type="checkbox"/>	Immediate	<input type="checkbox"/>
Hours			
Contact Information & Results Distribution:			
<input type="checkbox"/> Cell Phone		<input type="checkbox"/> Fax	
<input checked="" type="checkbox"/> E-Mail: DARREN.TOWNSEND@			
Name: D. TOWNSEND	Cell Phone: 610 741 0501	Fax:	E-Mail: ATC ASSOCIATES.COM

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-1A	Window Caulking (old)		X	Rm. 135 - window 3	PLM	
B-1B	" "		X	Rm. 225A - window 1		
B-2A	Window Caulking (new)		X	Rm. 117 - window 2		
B-2B	" "		X	Rm. 131 - window 1		
B-3A	4" Black Cove Base ^Δ		X	Rm. 170		
B-3B	" " ^Δ		X	Rm. 217		
B-4A	Mastic assoc. with 4" Black Cove Base		X	Rm 170		
B-4B	" "		X	Rm 217		
B-SA	^{CORIGINALLY} Gypsum Wall Board	X		Rm 135 - ceiling		
B-SB	" "	X		Rm 225		
B-6A	Gypsum wallboard - ^{Dividing} walls	X		Rm. 225 B		
B-6B	" "	X		Rm. 224 C		
B-7A	^(brown) Mastic Assoc. w. ^{Grey} Base Carpet	X		Rm 109 ^{DIT} 109		
B-7B	" " ^{DIT}	X		Rm. 105 ^{DIT} 106		
B-8A	12"x12" VFT - Light Grey * Marbled	X		Rm 122		✓

Special Instructions:
 * Analyze tile only
 Δ Analyze cove base only
 Stop at first positive for all groups
 PLM ONLY



2/7

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24541

Bulk Sample Chain of Custody			
Client:		Samples Collected By:	Date:
Project # / Task:		Samples Transported By:	See Pg 1
Facility:		Samples Received By:	ATC Joe Yinghao 8/22
Proj. Mgr.		Samples Analyzed By:	ATC A-MK
			Date: 8/19/12 10:00 AM
			Date: 8/16/12 11:58 PM

Sample Turnaround Time:			
24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>
Days	<input type="checkbox"/>	Immediate	<input type="checkbox"/>
Hours			
Contact Information & Results Distribution: <input type="checkbox"/> Cell Phone <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail			
Name:	Cell Phone:	Fax:	E-Mail:

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-8B	" *		X	Rm 136	PLM	
B-9A	Mastic assoc. w. 12"x12" VET - Light Grey Marbled		X	Rm 122		
B-9B	" "		X	Rm 136		
B-10A	(brown) Mastic assoc. w. grey brown carpet		X	Rm. 108 108		
B-10B	" ^{DKT} " "		X	Rm. 106 104		
B-11A	Door caulking - old		X	Hallway 101 - west end door		
B-11B	" "		X	Rm 202A - Door		
B-12A	Door caulking - new		X	Rm 117		
B-12B	" "		X	Rm 131		
B-13A	2'x2' CT - speckled	X		Rm 171		
B-13B	" "	X		Rm. 209		
B-14A	Fibred Wall Surfacing	X		Rm 216 - East ^{Ceiling} Wall _{DKT}		
B-14B	" "	X		Rm 216 - East Ceiling		
B-15A	2'x2' CT - Plain	X		Rm 151 - Men's W/C		
B-15B	" "	X		Rm 151 - Men's W/C		✓

Special Instructions:

See first page (pg 1)



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24541

Bulk Sample Chain of Custody			
Client:		Samples Collected By:	Date:
Project # / Task:		Samples Transported By:	Date:
Facility:		Samples Received By:	Date:
Proj. Mgr.:		Samples Analyzed By:	Date:

See Pg. 1
ATC Joe Ying 8/9/12
ATC A-M
8/9/12 10:00 am
8/10/12 11:57 AM

Sample Turnaround Time:			
24 Hours <input type="checkbox"/>	18 Hours <input type="checkbox"/>	Days <input type="checkbox"/>	Immediate <input type="checkbox"/> Hours
Contact Information & Results Distribution: <input type="checkbox"/> Cell Phone <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail			
Name:	Cell Phone:	Fax:	E-Mail:

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-16A	Bathroom Caulking		X	Rm 122 (Woman's w/c)	PLM	
B-16B	" "		X	Rm. 214? (Mens w/c)		
B-17A	12"x12" VFT - Grey w. black & white spots *		X	Rm. 170		
B-17B	" " *		X	Rm. 117		
B-18A	Mastic assoc. w. 12"x12" VFT grey w. white & black spots		X	Rm. 170		
B-18B	" "		X	Rm. 117		
B-19A	4" Brown core base ^Δ		X	Rm. 108		
B-19B	" " ^Δ		X	Rm. 108 104		
B-20A	Mastic assoc. w. 4" brown core base		X	Rm. 108		
B-20B	" "		X	Rm 104		
B-21A	Joint compound - original	X		Rm 142 (kitchen)		
B-21B	" "	X		Rm ^{DPT} 142 ^{RM} 153		
B-22A	Gypsum wall board - new	X		Rm 117 - by furnace		
B-22B	" "	X		Rm 117 - by furnace		
B-23A	Joint compound - new	X		" "		✓

Special Instructions:

See Pg. 1



④/7

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Bulk Sample Chain of Custody			
Client:		Samples Collected By:	Date:
Project # / Task:		Samples Transported By:	Date:
Facility:		Samples Received By:	Date:
Proj. Mgr.:		Samples Analyzed By:	Date:

See Pg. 1
ATE Jie Ying Gao
ATE A- [Signature]
8/9/12 10:00am
8/10/12 11:55am

Sample Turnaround Time:			
24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>
Days	<input type="checkbox"/>	Immediate	<input type="checkbox"/>
Hours	<input type="checkbox"/>		
Contact Information & Results Distribution:			
<input type="checkbox"/>	Cell Phone	<input type="checkbox"/>	Fax
<input type="checkbox"/>	E-Mail		
Name:	Cell Phone:	Fax:	E-Mail:

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-23B	" "	X		Rm 117 - by furnace	PLM	
B-14C	Fibred Wall Surfacing	X		Central Ceiling - Rm 216		
B-14D	" "	X		Rm 216 - West ^{Ceiling} Wall (DFI)		
B-14E	" "	X		Rm 216 - West Ceiling		
B-15A	12"x12"		(DFI)	— VOID		
B-15B	12"x12"			— VOID		
B-16A	12"x12"			— VOID		
B-16B	12"x12"			— VOID		
B-24A	12"x12" VFT - Pink/Orange Marbled *		X	Rm 153 - under carpet		
B-24B	" " *		X	Rm, 119 - under B-S		
B-25A	Black Mastic assoc. w. 12"x12" VFT - Pink/Orange marbled		X	Rm 153 - Under carpet		
B-25B	" "		X	Rm 119 - Under B-S		
B-26A	12"x12" VFT - Grey w. Black stripes *		X	- EAST Hallway 101 - By Rm 153		
B-26B	" " *		X	Hallway 101 - West - By Rm 136		
B-27A	Mastic assoc. w. 12"x12" VFT - grey w. black stripes		X	Hallway 101 - By Rm 153		

Special Instructions:

See Pg. 1



5/7
24541

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Bulk Sample Chain of Custody			
Client:		Samples Collected By:	Date:
Project # / Task:		Samples Transported By:	Date:
Facility:		Samples Received By:	Date:
Proj. Mgr.		Samples Analyzed By:	Date:

See Pg 1
ATC Tyeing Cap 8/2
ATE A-MT
8/9/12
8/10/12

Sample Turnaround Time:			
24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>
Days	<input type="checkbox"/>	Immediate	<input type="checkbox"/>
Hours			
Contact Information & Results Distribution:			
<input type="checkbox"/>	Cell Phone	<input type="checkbox"/>	Fax
<input type="checkbox"/>	E-Mail		
Name:	Cell Phone:	Fax:	E-Mail:

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-27B	" "		X	Hallway 101-West - By Room 136	PLM	
B-28A	12"x12" VFT - Beige/yellow *		X	Room 161 (under B-8)	↓	
B-28B	" " *		X	Rm. 224A		
B-29A	Mastic assoc. w. 12"x12" VFT - Beige/yellow		X	Room 161 (under B-8)		
B-29B	" "		X	Rm. 224A		
B-30A	12"x12" VFT - Blue Marbled *		X	Room 176 (under B-8)		
B-30B	" " *		X	Rm 105 (under B-8)		
B-31A	Mastic assoc. with 12"x12" VFT - Blue Marbled		X	Room 176 (under B-8)		
B-31B	" "		X	Rm 105 (under B-8)		
B-32A	Resilient vinyl Flooring * - white Brick Style		X	Room 172		
B-32B	" "		X	Room 142 (Kitchen)		
B-33A	Mastic Assoc. with resilient vinyl flooring - white brick style		X	Room 172		
B-33B	" "		X	Rm. 142 (Kitchen)		
B-34A	Expansion Joint - Floor	X		Rm. 148 (Boiler Rm)		
B-34B	" "	X		Rm. 148 (Boiler Rm)		

Special Instructions:

See Pg 1



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⑥/7
 24541

Bulk Sample Chain of Custody			
Client:		Samples Collected By:	Date:
Project # / Task:		Samples Transported By:	Date:
Facility:		Samples Received By:	Date:
Proj. Mgr.:		Samples Analyzed By:	Date:

See Pg. 1
ATC Tie-Ling Geo. 8/9/12
MR A. Out
 8/9/12 10:00 am
 8/10/12 11:59 am

Sample Turnaround Time:			
24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>
Days	<input type="checkbox"/>	Immediate	<input type="checkbox"/>
Hours			
Contact Information & Results Distribution: <input type="checkbox"/> Cell Phone <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail			
Name:	Cell Phone:	Fax:	E-Mail:

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
B-35A	18" Pipe Insulation - And	X		Rm 144 - Boiler Rm. - By stairs	PLM	
B-35B	" "	X		" " - By boiler		
B-35C	" "	X		" " - By boiler		
B-36A	Pipe insulation - corrugated	X		Rm 148 - By stairs		
B-36B	" "	X		Rm 132 - corner		
B-36C	" "	X		Hallway 141 145 (DKT)		
B-37A	Pipe elbow insulation - and	X		Rm 148 - By stairs		
B-37B	" "	X		Hallway 101 - By Rm 144		
B-37C	" "	X		Hallway 101 - By Rm 144		
B-38A	9"x9" VFT - Grey *		X	Rm. 135 - By fire pl. - UNDER B-P		
B-38B	" " *		X	Rm - 135 - By windows		
B-39A	Mastic assoc. with 9"x9" VFT - Grey (BLACK)		X	Rm 135 - By fire pl. UNDER B-P		
B-39B	" "		X	Rm. 135 - By windows		
B-40A	9"x9" VFT - BLACK *		X	Hallway 141 145 - UNDER B-P (DKT)		
B-40B	" " *		X	Top of Central Stairwell		

Special Instructions:

See Pg. 1



ATC ASSOCIATES INC

104 E. 25th Street, 10th Floor
New York, NY 10010
Tel. 212-353-8280
Fax: 212-353-8306

Client: ATC ASSOCIATES INC. - NEW JERSEY
THREE TERRI LANE
BURLINGTON, NJ 08016
Fax: (609) 386-7951 **Phone:** (609) 386-8800
Project: ARC

Sample Date : 8/7/2012
Date Received : 8/10/2012
Date Analyzed : 8/10/2012
ATC Batch # 24534

Methods: EPA 600/M4-82-020
ELAP 198.1, 198.6 and 198.4

Location: WILMINGTON ARC
Project # 68.43398.0001

Bulk Asbestos Analysis Results

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
SH-1A	WINDOW EXT - 1	WINDOW CAULKING	PLM	Trace% Cellulose	25% Mineral Filler 75% Organic Binders		NONE DETECTED
24534 -1							
Analyzed By: George Htay Color: BLACK Comments: NOB recommended							
SH-1B	WINDOW EXT - 4	WINDOW CAULKING	PLM	Trace% Cellulose	26% Mineral Filler 74% Organic Binders		NONE DETECTED
24534 -2							
Analyzed By: George Htay Color: BLACK Comments: NOB recommended							
SH-2A	EAST WALL - BY FIRE DOOR	FLOOR EXPANSION JOINT	PLM	80% Cellulose	20% Mineral Filler		NONE DETECTED
24534 -3							
Analyzed By: George Htay Color: DK.BROWN							
SH-2B	WEST WALL - BY FIRE DOOR	FLOOR EXPANSION JOINT	PLM	79% Cellulose	21% Mineral Filler		NONE DETECTED
24534 -4							
Analyzed By: George Htay Color: DK.BROWN							
SH-3A	BOILER ROOM	GYPSUM WALL BOARD	PLM	20% Cellulose 5% FiberGlass	73% Mineral Filler 2% Paint		NONE DETECTED
24534 -5							
Analyzed By: George Htay Color: WHITE							
SH- 3B	OFFICE 3	GYPSUM WALL BOARD	PLM	23% Cellulose 5% FiberGlass	70% Mineral Filler 2% Paint		NONE DETECTED
24534 -6							
Analyzed By: George Htay Color: WHITE							
SH-4A	BOILER ROOM	JOINT COMPOUND	PLM	Trace% Cellulose 35% FiberGlass	65% Mineral Filler		NONE DETECTED
24534 -7							
Analyzed By: George Htay Color: WHITE							



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New York, NY 10010

Tel. 212-353-8280

Fax: 212-353-8306

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
SH-4B	OFFICE 3	JOINT COMPOUND	PLM	Trace% Cellulose 33% FiberGlass	67% Mineral Filler		NONE DETECTED
24534 -8							
Color: WHITE							
Analyzed By: George Htay							
SH-5A	W/C	12"X12" GREY FT	PLM	Trace% Cellulose	62% Mineral Filler 38% Organic Binders		NONE DETECTED
24534 -9							
Color: BLACK							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-5B	W/C	12"X12" GREY FT	PLM	Trace% Cellulose	61% Mineral Filler 39% Organic Binders		NONE DETECTED
24534 -10							
Color: BLACK							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-6A	W/C	MASTIC ASSOC. W/12"X12" GREY FT	PLM	Trace% Cellulose	8% Mineral Filler 92% Organic Binders		NONE DETECTED
24534 -11							
Color: BLACK							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-6B	W/C	MASTIC ASSOC. W/12"X12" GREY FT	PLM	Trace% Cellulose	9% Mineral Filler 91% Organic Binders		NONE DETECTED
24534 -12							
Color: BLACK							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-7A	W/C	4" BROWN COVE BASE	PLM	Trace% Cellulose	33% Mineral Filler 67% Organic Binders		NONE DETECTED
24534 -13							
Color: BROWN							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-7B	W/C	4" BROWN COVE BASE	PLM	Trace% Cellulose	32% Mineral Filler 68% Organic Binders		NONE DETECTED
24534 -14							
Color: BROWN							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-8A	W/C	MASTIC BROWN ASSOC. W/4" BROWN COVE BASE	PLM		8% Mineral Filler 92% Organic Binders		NONE DETECTED
24534 -15							
Color: DK.BROWN							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-8B	W/C	MASTIC BROWN ASSOC. W/4" BROWN COVE BASE	PLM		9% Mineral Filler 91% Organic Binders		NONE DETECTED
24534 -16							
Color: DK.BROWN							
Comments: NOB recommended							
Analyzed By: George Htay							
SH-9A	EAST WALL FIRE DOOR	DOOR CAULKING	PLM	Trace% Cellulose	30% Mineral Filler 70% Organic Binders		Trace Chrysotile
24534 -17							
Color: LT.GRAY							
Comments: NOB recommended							
Analyzed By: George Htay							
							Total Asbestos: TRACE



ATC ASSOCIATES INC
 104 E. 25th Street, 10th Floor
 New York, NY 10010
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 Fax: 212-353-8306

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u> % Type	<u>Asbestos</u> % Type
				% Fibrous	% Non-Fibrous		
SH-9B	WEST WALL FIRE DOOR	DOOR CAULKING	PLM	Trace% Cellulose	32% Mineral Filler 68% Organic Binders		NONE DETECTED
24534 -18							
			Color: LT.GRAY	Comments: NOB recommended			
Analyzed By: George Htay							
SH-10A	OFFICE 3	GRAY/BLUE 12"X12" VFT	PLM	Trace% Cellulose	62% Mineral Filler 38% Organic Binders		NONE DETECTED
24534 -19							
			Color: INDIGO BLUE	Comments: NOB recommended			
Analyzed By: George Htay							
SH-10B	OFFICE 3	GRAY/BLUE 12"X12" VFT	PLM	Trace% Cellulose	61% Mineral Filler 39% Organic Binders		NONE DETECTED
24534 -20							
			Color: INDIGO BLUE	Comments: NOB recommended			
Analyzed By: George Htay							
SH-11A	OFFICE 3	BLACK MASTIC ASSOC. W/GRAY/BLUE 12"X12" VFT	PLM	Trace% Cellulose	18% Mineral Filler 82% Organic Binders		NONE DETECTED
24534 -21							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: George Htay							
SH-11B	OFFICE 3	BLACK MASTIC ASSOC. W/GRAY/BLUE 12"X12" VFT	PLM	Trace% Cellulose	17% Mineral Filler 83% Organic Binders		NONE DETECTED
24534 -22							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: George Htay							
SH-12A	OFFICE 3	4" BLACK COVE BASE	PLM		30% Mineral Filler 70% Organic Binders		NONE DETECTED
24534 -23							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: George Htay							
SH-12B	OFFICE 3	4" BLACK COVE BASE	PLM		32% Mineral Filler 68% Organic Binders		NONE DETECTED
24534 -24							
			Color: BLACK	Comments: NOB recommended			
Analyzed By: George Htay							
SH-13A	OFFICE 3	MASTIC (BROWN) ASSOC. W/4" BLACK COVE BASE	PLM	Trace% Cellulose	13% Mineral Filler 87% Organic Binders		NONE DETECTED
24534 -25							
			Color: DK.BROWN	Comments: NOB recommended			
Analyzed By: George Htay							
SH-13B	OFFICE 3	MASTIC (BROWN) ASSOC. W/4" BLACK COVE BASE	PLM	Trace% Cellulose	14% Mineral Filler 86% Organic Binders		NONE DETECTED
24534 -26							
			Color: DK.BROWN	Comments: NOB recommended			
Analyzed By: George Htay							
SH-14A	BOILER ROOM	BOILER INSULATION (PIPE) MUD	PLM	Trace% Cellulose	100% Mineral Filler		NONE DETECTED
24534 -27							
			Color: WHITE				
Analyzed By: George Htay							



ATC ASSOCIATES INC

104 E. 25th Street, 10th Floor

New York, NY 10010

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Fax: 212-353-8306

Sample #	Location	Type of Material	Method	<u>Non-Asbestos</u>		<u>NOB</u>	<u>Asbestos</u>
				% Fibrous	% Non-Fibrous	% Type	% Type
SH-14B	BOILER ROOM	BOILER INSULATION (PIPE) MUD	PLM	Trace% Cellulose	100% Mineral Filler		
24534 -28							NONE DETECTED
Analyzed By: George Htay		Color: WHITE			Trace% Paint		
SH-14C	BOILER ROOM	BOILER INSULATION (PIPE) MUD	PLM	Trace% Cellulose	100% Mineral Filler		
24534 -29							NONE DETECTED
Analyzed By: George Htay		Color: WHITE	Comments:		Trace% Paint		

NOTES:

- 1) The Limit of Detection is the same as the Reporting Limit for these results.
- 2) The Reporting Limit (RL) is the Limit of Quantitation. For point counts the limit of quantitation of 0.25%; based on one asbestos point counter over 400 non-empty points.
- 3) Asbestos Containing Material (ACM) Definition: > 1% asbestos by weight is considered an ACM
- 4) Disclaimer: The laboratory is not responsible for sample collection. Please refer to enclosed letter. This report may not be reproduced, except in full, without written approval by ATC Associates Inc. This report may not be used to claim product endorsement by NVLAP or any other agency of the U.S. Government. This report relates only to the samples reported above as described in the chain of custody. Quality control data is available upon request.
- 5) Accredited by NVLAP #101187-0 and by NY State ELAP #10879
- 6) Confidentiality Notice: The document(s) contained herein are confidential and privileged information, intended for the exclusive use of the individual or entity named above.
- 7) Liability Notice: ATC Associates Inc. and its personnel shall not be liable for any misinformation provided to us by the client regarding these samples. This report relates only to samples submitted and analyzed.
- 8) When the results display more than three digits, only the first three are significant. The data within this report is reliable to 3 significant figures.
- 9) The condition of all samples was acceptable upon receipt.
- 10) The laboratory certifies that the test results meet all requirements of NELAC.
- 11) Supplement to test report batch # _____. Amendments: _____. Amendment Dates: _____. Amended by: _____
- 12) PLM Letter is attached on this report.
- 13) TRACE = LESS THAN LIMIT OF QUANTITATION (<0.25%)
- 14) ATC certifies that this report is an accurate and authentic report of the results obtained from the laboratory analysis
- 15) The uncertainty for these test results is available upon request.

George Htay

Analyst:

Milena Bonezzi

Approved by
Laboratory Director:



✓
24534

①

3 Terri Lane
Burlington, NJ 08016
www.atcassociates.com
609.386.8800
Fax 609.386.7951

Bulk Sample Chain of Custody

Client:	ARC	Samples Collected By:	D. TOWNSEND	Date:	8-7-12
Project # / Task:	68-43398-0001	Samples Transported By:	D. TOWNSEND	Date:	8-8-12
Facility:	WILMINGTON ARC	Samples Received By:		Date:	
Proj. Mgr.	BRIAN KEARNEY	Samples Analyzed By:		Date:	

Sample Turnaround Time:

24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>	3 Days	<input checked="" type="checkbox"/>	immediate	<input type="checkbox"/>	Hours
Contact Information & Results Distribution:						<input type="checkbox"/> Cell Phone	<input type="checkbox"/> Fax	<input checked="" type="checkbox"/> E-Mail DARREN.TOWNSEND@
Name: D. TOWNSEND		Cell Phone: 609-418-8899		Fax:		E-Mail: ATCASSOCIATES.COM		

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
SH-1A	Window Caulking		X	Window Ext - 1	PLM	
SH-1B	" "		X	Window Ext - 4		
SH-2A	Floor Expansion Joint		X	East Wall - By Fire Door		
SH-2B	" "		X	West Wall - By Fire Door		
SH-3A	Gypsum Wall Board	X		Boiler Room		
SH-3B	" "	X		OFFICE 3		
SH-4A	Joint Compound	X		Boiler Room		
SH-4B	" "	X		OFFICE 3		
SH-5A	12"x12" Grey F.T. *		X	W/C		
SH-5B	" " *		X	W/C		
SH-6A	Mastic (Black) Associated w/ 12x12 Grey F.T.		X	W/C		
SH-6B	" "		X	W/C		
SH-7A	4" Brown Cove Base Δ		X	W/C		
SH-7B	" " Δ		X	W/C		
SH-8A	Mastic (Brown) Associated w/ 4" Brown Cove Base		X	W/C	✓	

Special Instructions:

- * Analyze tile only
- Δ Analyze cove base only.

Stop at first positive - All sample groups

PLM ONLY Analyzed by: APC George on 8/8/12
w/repac ent 12:20 pm

29 PLM
10



#24534

(2)

3 Terri Lane
Burlington, NJ 08016
www.atcassociates.com
609.386.8800
Fax 609.386.7951

Bulk Sample Chain of Custody

Client:		Samples Collected By:	D. TOWNSEND	Date:	8-7-12
Project # / Task:		Samples Transported By:	D. TOWNSEND	Date:	8-8-12
Facility:	WILMINGTON ARC	Samples Received By:		Date:	
Proj. Mgr.		Samples Analyzed By:		Date:	

Sample Turnaround Time:

24 Hours	<input type="checkbox"/>	48 Hours	<input type="checkbox"/>	Days	<input type="checkbox"/>	Immediate	<input type="checkbox"/>	Hours
Contact Information & Results Distribution: <input type="checkbox"/> Cell Phone <input type="checkbox"/> Fax <input type="checkbox"/> E-Mail								
Name:	Cell Phone:	Fax:	E-Mail:					

SAMPLE I.D. #	Type & Description of Material	Friable		Location	Analysis Method	Result
		Yes	No			
SH-8B	" "		X	W/C	PLM	
SH-9A	Door Caulking		X	East Wall Fire Door		
SH-9B	" "		X	West Wall Fire Door		
SH-10A	Grey/Blue 12"x12" FT. *		X	Office 3		
SH-10B	" " *		X	Office 3		
SH-11A	Black Mastic Associated w. 12"x12" Grey/Blue F.T.		X	Office 3		
SH-11B	" "		X	Office 3		
SH-12A	4" Black Cove Base ^		X	Office 3		
SH-12B	" " ^		X	Office 3		
SH-13A	Mastic (Brown) Associated w. 4" Black cove base		X	Office 3		
SH-13B	" "		X	Office 3		
SH-14A	Boiler insulation (pipe) mud.	X		Boiler Room		
SH-14B	" "	X		Boiler Room		
SH-14C	" "	X		Boiler Room		

Special Instructions:

See first page Analyzed by: AIC Group @ 8/10/12 12:20pm

Appendix E

Certifications

Certificate of Completion

Darren Townsend

for successfully completing the prescribed course of study in

**Pennsylvania Asbestos
Building Inspector Refresher Course**

under TSCA Title II

presented by

ACCESS TRAINING SERVICES, INC.
7921 River Road, Pennsauken, NJ 08109
(856) 665-3449

5/24/12

Course Date

5/24/13

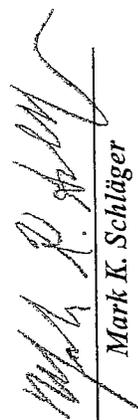
Expiration Date

Not Provided

Social Security Number

ACC-0512-6-008

Certificate Number



Mark K. Schlager
Training Director

Appendix F

Photos and Photo Log of Homogenous Materials



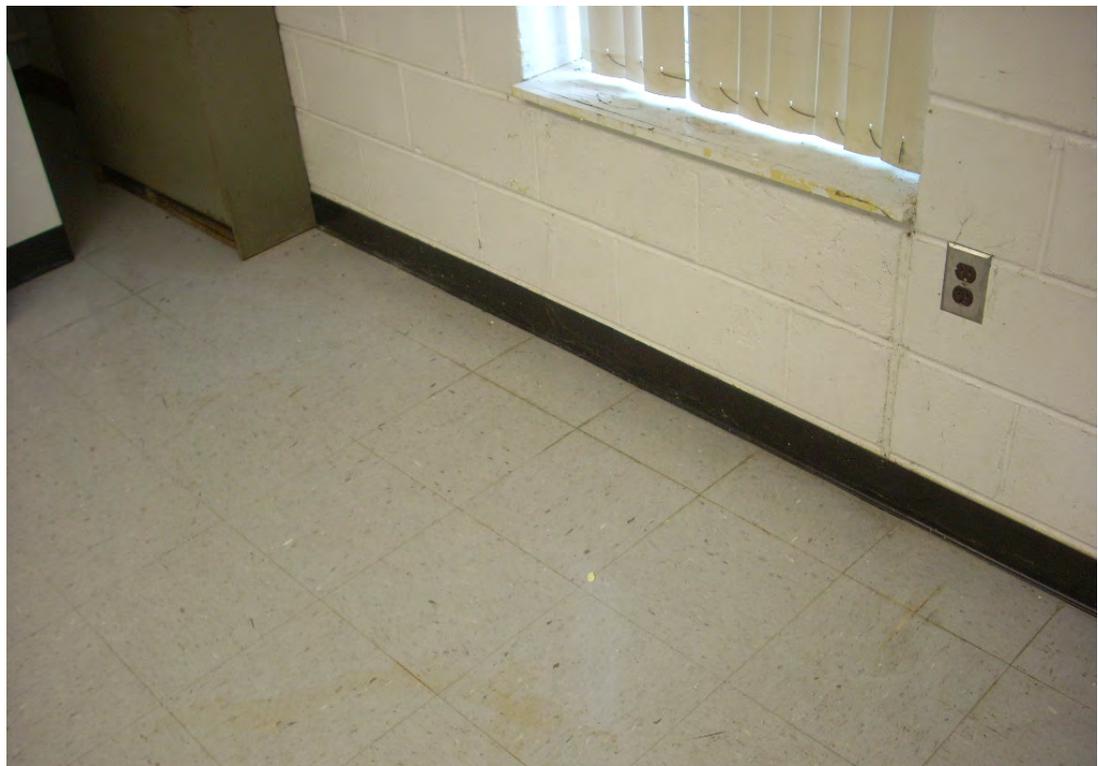
Photograph No. 1: View of Building 1 (Administrative Building)



Photograph No. 2: Representative view of original window caulking (HB-1)
located throughout Building 1



Photograph No. 3: Representative view of new window caulking (HB-2)
located in Building 1



Photograph No. 4: Representative view of 4" black cove base and
associated mastic (HB-3/4) located throughout Building 1



Photograph No. 5: Representative view of original gypsum wallboard (HB-5) and associated joint compound (HB-21) located throughout Building 1



Photograph No. 6: Representative view of gypsum wallboard dividing walls (HB-6) located in Building 1



Photograph No. 7: Representative view of mastic associated with grey carpet (HB-7) located in Building 1



Photograph No. 8: Representative view of 12"x12" light grey marbled vinyl floor tile (VFT) and associated mastic (HB-8/9) located throughout Building 1



Photograph No. 9: Representative view of mastic associated with brown carpet (HB-10) located in Building 1



Photograph No. 10: Representative view of original door caulking (HB-11) located throughout Building 1



Photograph No. 11: Representative view of new door caulking (HB-12)
located in Building 1



Photograph No. 12: Representative view of 2'x2' speckled ceiling tiles (HB-13)
located throughout Building 1



Photograph No. 13: Representative view of fibred wall surfacing (HB-14)
located in Building 1



Photograph No. 14: Representative view of 2'x2' plain ceiling tiles (HB-15)
located in Building 1



Photograph No. 15: Representative view of porcelain caulking (HB-16) located in Building 1



Photograph No. 16: Representative view of 12"x12" grey with black and white spots VFT and associated mastic (HB-17/18) located in Building 1



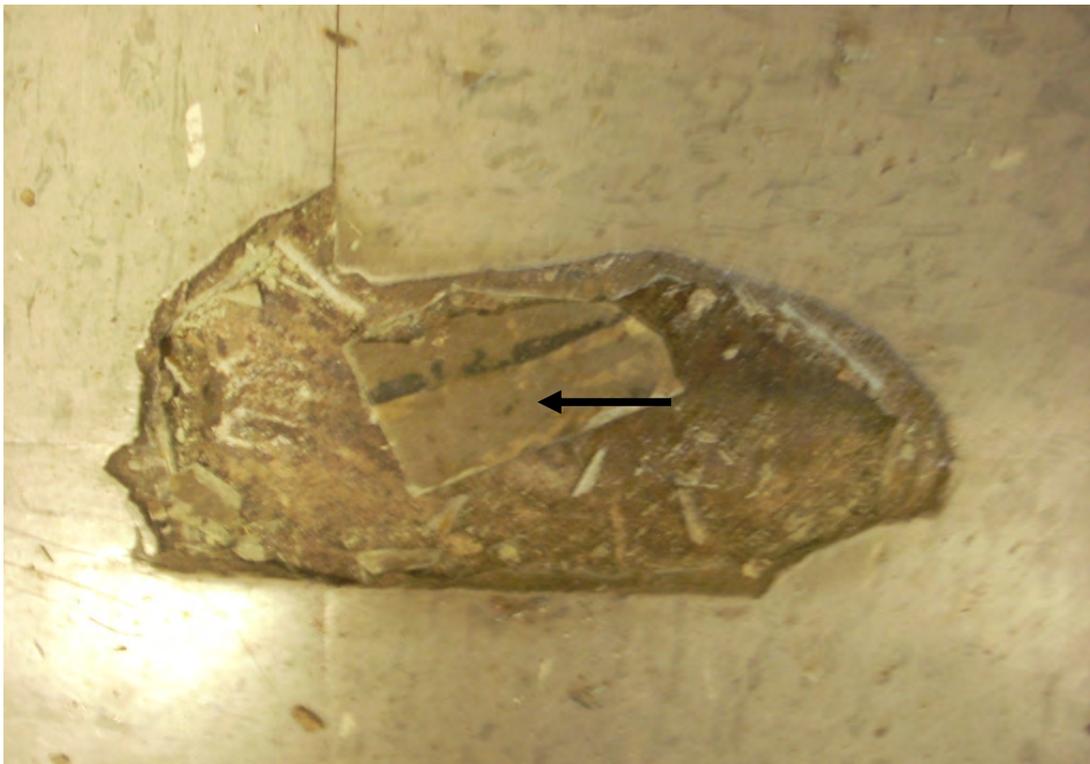
Photograph No. 17: Representative view of 4" brown cove base and associated mastic (HB-19/20) located in Building 1



Photograph No. 18: Representative view of new gypsum wallboard (HB-22) and associated joint compound (HB-23) located in Building 1



Photograph No. 19: Representative view of 12''x12'' pink/orange marbled VFT and associated mastic (HB-24/25) located in Building 1



Photograph No. 20: Representative view of 12''x12'' grey with black stripes VFT and associated mastic (HB-26/27) located in Building 1



Photograph No. 21: Representative view of 12"x12" beige/yellow VFT and associated mastic (HB-28/29) located in Building 1



Photograph No. 22: Representative view of 12"x12" blue marbled VFT and associated mastic (HB-30/31) located in Building 1



Photograph No. 23: Representative view of white brick vinyl flooring and associated mastic (HB-32/33) located in Building 1



Photograph No. 24: Representative view of floor expansion joint (HB-34) located in Building 1



Photograph No. 25: Representative view of 18" mudded pipe fitting (HB-35) located in Building 1 boiler room



Photograph No. 26: Representative view of corrugated pipe insulation (HB-36) located in Building 1 boiler room



Photograph No. 27: Representative view of mudded pipe fitting (HB-37)
located in Building 1 boiler room



Photograph No. 28: Representative view of 9"x9" grey
VFT and associated mastic (HB-38/39) located in Building 1



Photograph No. 29: Representative view of 12"x12" black VFT and associated mastic (HB-40/41) located in Building 1



Photograph No. 30: Representative view of fire doors (HB-42) located throughout Building 1



Photograph No. 31: Representative view of chalkboards (HB-44)
located in Building 1



Photograph No. 32: Overview of boiler room located in Building 1



Photograph No. 33: Representative view of hallways located in Building 1



Photograph No. 34: View above dropped ceiling in Building 1



Photograph No. 35: Overview of Building 2 (Maintenance Shop)



Photograph No. 36: Representative view of window caulking (HS-1)
located in Building 2



Photograph No. 37: Representative view of floor expansion joint (HS-2)
located in Building 2



Photograph No. 38: Representative view of gypsum wallboard (HS-3) and associated joint
compound (HB-4) located in Building 2



Photograph No. 39: Representative view of 12"x12" grey VFT and associated mastic (HS-5/6) located in Building 2



Photograph No. 40: Representative view of 4" brown cove base and associated mastic (HS-7/8) located in Building 2



Photograph No. 41: Representative view of door caulking (HS-9)
located in Building 2



Photograph No. 42: Representative view of 12"x12" grey/blue
VFT and associated mastic (HS-10/11) located in Building 2



Photograph No. 43: Representative view of 4" black cove base and associated mastic (HS-12/13) located in Building 2



Photograph No. 44: Representative view of mudded pipe fittings (HS-14) located in Building 2 boiler room



Photograph No. 45: View of the Building 2 workshop interior



Photograph No. 46: Overview of boiler room located in Building 2

ENCLOSURE 10

REGULATORY/PUBLIC COMMENTS & ARMY RESPONSE

To BE UPDATED AFTER PUBLIC COMMENT PERIOD

- The Notice of Availability was placed in the [name of Paper] and the Draft FOST was placed at the ____ Library in City, State from ____ to ____ (see attached [attached affidavit and actual NOA from paper below). No public comments were received during the review period.
- The Draft FOST was sent to DNREC on DATE. DE responded...
- The Draft FOST was sent to US EPA Region 3 on _____. The EPA responded
- Army response...