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CERTIFICATE OF ANALYSIS

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Client: EnviroTest Laboratories, Inc.  
315 Fullerton Avenue  
Newburgh NY 12550

Report Date: 10/23/2019  
Report No.: 602209 - PLM  
Project: Walkin Client  
Project No.: 42000038

Client: ENV127

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PLM BULK SAMPLE ANALYSIS SUMMARY

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**Lab No.:** 6900398  
**Client No.:** 420-161900-1

**Analyst Observation:** Black Asphalt  
**Client Description:** Painted Asphalt

**Location:**  
**Facility:**

Percent Asbestos:  
*None Detected*

Percent Non-Asbestos Fibrous Material:  
None Detected

Percent Non-Fibrous Material:  
100

**Lab No.:** 6900398(L2)  
**Client No.:** 420-161900-1

**Analyst Observation:** Blue Paint  
**Client Description:** Painted Asphalt

**Location:**  
**Facility:**

Percent Asbestos:  
*None Detected*


Percent Non-Asbestos Fibrous Material:  
None Detected

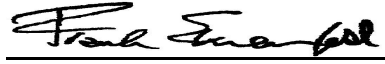
Percent Non-Fibrous Material:  
100

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Please refer to the Appendix of this report for further information regarding your analysis.

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Date Received: 10/17/2019  
Date Analyzed: 10/23/2019  
Signature:   
Analyst: Randy Caran

Approved By:   
Frank E. Ehrenfeld, III  
Laboratory Director

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## Appendix to Analytical Report

**Customer Contact:** Debra Bayer

**Method:** 40 CFR Appendix E to Subpart E of Part 763, interim method for the Determination of Asbestos in Bulk Insulation Samples, and USEPA 600, R93-116 as needed.

This appendix seeks to promote greater understanding of any observations, exceptions, special instructions, or circumstances that the laboratory needs to communicate to the client concerning the above samples. The information below is used to help promote your ability to make the most informed decisions for you and your customers. Please note the following points of contact for any questions you may have.

**iATL Customer Service:** customerservice@iatl.com

**iATL Office Manager:** wchampion@iatl.com

**iATL Account Representative:** Shirley Clark

**Sample Login Notes:** See Batch Sheet Attached

**Sample Matrix:** Bulk Building Materials

**Exceptions Noted:** See Following Pages

### General Terms, Warrants, Limits, Qualifiers:

General information about iATL capabilities and client/laboratory relationships and responsibilities are spelled out in iATL policies that are listed at [www.iATL.com](http://www.iATL.com) and in our Quality Assurance Manual per ISO 17025 standard requirements. The information therein is a representation of iATL definitions and policies for turnaround times, sample submittal, collection media, blank definitions, quantification issues and limit of detection, analytical methods and procedures, sub-contracting policies, results reporting options, fees, terms, and discounts, confidentiality, sample archival and disposal, and data interpretation.

iATL warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted. iATL disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. iATL accepts no legal responsibility for the purpose for which the client uses test results. Any analytical work performed must be governed by our Standard Terms and Conditions. Prices, methods and detection limits may be changed without notification. Please contact your Customer Service Representative for the most current information.

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### Information Pertinent to this Report:

Analysis by US EPA 600 93-116: Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).

### Certifications:

- NIST-NVLAP No. 101165-0
- NYSDOH-ELAP No. 11021
- AIHA-LAP, LLC No. 100188

Quantification at <0.25% by volume is possible with this method. (PC) Indicates Stratified Point Count Method performed. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. PC Trace represents a <0.25% amount. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed (ex. analyze until positive instructions). Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, PLM is not consistently reliable in detecting asbestos in non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing.

Analytical Methodology Alternatives: Your initial request for analysis may not have accounted for recent advances in regulatory requirements or advances in technology that are routinely used in similar situations for other qualified projects. You may have the option to explore additional analysis for further information. Below are a few options, listed as the matrix followed by the appropriate methodology. Also included are links to more information on our website.

Bulk Building Materials that are Non-Friable Organically Bound (NOB) by Gravimetric Reduction techniques employing PLM and TEM: ELAP 198.6 (PLM-NOB), ELAP 198.4 (TEM-NOB)

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Loose Fill Vermiculite Insulation, Attic Insulation, Zonolite (copyright), etc.: US EPA 600 R-4/004 (multi-tiered analytical process)  
Sprayed On Insulation/Fireproofing with Vermiculite (SOF-V): ELAP 198.8 (PLM-SOF-V)

Soil, sludge, sediment, aggregate, and like materials analyzed for asbestos or other elongated mineral particles (ex. erionite, etc.): ASTM D7521, CARB 435, and other options available

Asbestos in Surface Dust according to one of ASTM's Methods (very dependent on sampling collection technique – by TEM): ASTM D 5755, D5756, or D6480

Various other asbestos matrices (air, water, etc.) and analytical methods are available.

### Disclaimers / Qualifiers:

There may be some samples in this project that have a "NOTE:" associated with a sample result. We use added disclaimers or qualifiers to inform the client about something that requires further explanation. Here is a list with highlighted disclaimers that may be pertinent to this project. For a full explanation of these and other disclaimers, please inquire at [customerservice@iatl.com](mailto:customerservice@iatl.com).

- 1) Note: No mastic provided for analysis.
- 2) Note: Insufficient mastic provided for analysis.
- 3) Note: Insufficient material provided for analysis.
- 4) Note: Insufficient sample provided for QC reanalysis.
- 5) Note: Different material than indicated on Sample Log / Description.
- 6) Note: Sample not submitted.
- 7) Note: Attached to asbestos containing material.
- 8) Note: Received wet.
- 9) Note: Possible surface contamination.
- 10) Note: Not building material. 1% threshold may not apply.
- 11) Note: Recommend TEM-NOB analysis as per EPA recommendations.
- 12) Note: Asbestos detected but not quantifiable.
- 13) Note: Multiple identical samples submitted, only one analyzed.
- 14) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.080%.
- 15) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.125%.
- 16) Note: This sample contains >10% vermiculite mineral. See Appendix for Recommendations for Vermiculite Analysis.

### Recommendations for Vermiculite Analysis:

Several analytical protocols exist for the analysis of asbestos in vermiculite. These analytical approaches vary depending upon the nature of the vermiculite mineral being tested (e.g. un-processed gange, homogeneous exfoliated books of mica, or mixed mineral composites). Please contact your client representative for pricing and turnaround time options available.

iATL recommends initial testing using the EPA 600/R-93/116 method. This method is specifically designed for the analysis of asbestos in bulk building materials. It provides an acceptable starting point for primary screening of vermiculite for possible asbestos.

Results from this testing may be inconclusive. EPA suggests proceeding to a multi-tiered analysis involving wet separation techniques in conjunction with PLM and TEM gravimetric analysis (EPA 600/R-04/004).

For New York State customers, NYSDOH requires disclaimers and qualifiers for various vermiculite containing samples that direct analysis via ELAP198.6 and ELAP198.8 for samples that contain >10% vermiculite mineral where ELAP198.6 may be used to evaluate the asbestos content of the material. However, any test result using ELAP198.6 will be reported with the following disclaimer: "ELAP198.6 method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing >10% vermiculite."

Further information on this method and other vermiculite and asbestos issues can be found at the following: Agency for Toxic Substances and Disease Registry (ATSDR) [www.atsdr.cdc.gov](http://www.atsdr.cdc.gov), United States Geological Survey (USGS) [www.minerals.usgs.gov/minerals/](http://www.minerals.usgs.gov/minerals/), US EPA [www.epa.gov/asbestos](http://www.epa.gov/asbestos). The USEPA also has an informative brochure "Current Best Practices for Vermiculite Attic Insulation" EPA 747F03001 May 2003, that may assist the health and remediation professional.

The following is a summary of the analytical process outlines in the EPA 600/R-04/004 Method:

1) **Analytical Step/Method:** Initial Screening by PLM, EPA 600R-93/116  
**Requirements/Comments:** Minimum of 0.1 g of sample. ~0.25% LOQ for most samples.

2) **Analytical Step/Method:** Wet Separation by PLM Gravimetric Technique, EPA R-04/004  
**Requirements/Comments:** Minimum 50g\*\* of dry sample. Analysis of "Sinks" only.

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3)**Analytical Step/Method:** Wet Separation by PLM Gravimetric Technique, EPA R-04/004  
**Requirements/Comments:** Minimum 50g\*\* of dry sample. Analysis of "Floats" only.

4)**Analytical Step/Method:** Wet Separation by TEM Gravimetric Technique, EPA R-04/004  
**Requirements/Comments:** Minimum 50g\*\* of dry sample. Analysis of "Sinks" only.

5)**Analytical Step/Method:** Wet Separation by TEM Gravimetric Technique, EPA R-04/004  
**Requirements/Comments:** Minimum 50g\*\* of dry sample. Analysis of "Suspension" only.

LOQ, Limit of Quantitation estimates for mass and volume analyses.

\*With advance notice and confirmation by the laboratory.

\*\*Approximately 1 Liter of sample in double-bagged container (~9x6 inch bag of sample).