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August 12, 2019

Ms. Michelle Rogow
Federal On-Scene Coordinator
U. S. Environmental Protection Agency
Region 9, Emergency Response Section
75 Hawthorne Street
San Francisco, CA 94105

Subject: Navajo Forest Product Industry (NFPI) 2019 Removal Assessment
Red Lake Chapter, Navajo Nation, New Mexico
TDD No.: 0020/1302-T20-R9-19-05-0001
Document Control No.: 0231-08-ACHS

Dear Ms. Rogow:

Under Technical Direction Document (TDD) No. 0020/1302-T20-R9-19-05-0001, the U.S. Environmental Protection Agency (EPA) Region 9 tasked the Weston Solutions, Inc. (WESTON®) Superfund Technical Assessment and Response Team (START) to assist EPA Federal On-Scene Coordinators (FOSC) at the Navajo Forest Product Industry (NFPI) Removal Assessment in Navajo, McKinley County, New Mexico, in the Red Lake Chapter of the Navajo Nation (**Figure 1**). The objective of this Removal Assessment was to further evaluate the presence of asbestos associated with the former Drying Kiln Building as well as perform an assessment of the building material debris located throughout previously demolished buildings and debris piles at the Site. This letter report summarizes the support activities provided by START for the NFPI Removal Assessment.

SITE DESCRIPTION

The NFPI Site is located on Walnut Avenue near the intersection with Indian Service Route 12 in Navajo, McKinley County, New Mexico, in the Red Lake Chapter of the Navajo Nation. The geographic coordinates for the approximate center of the Site are 35° 54' 42" North longitude and 109° 1' 48" West latitude. The Site is approximately 103 acres in total, and includes an old saw mill, offices, and a generating station with a sump and lagoon that discharges to Black Creek (**Figure 2**). Most of the buildings associated with the former NFPI facility have been demolished, however the former Drying Kiln Building does remain standing.

The Site is approximately 7,098 feet above mean sea level and is flat with regional topography sloping gently to the north-northwest. The Site is adjacent to Tohdildonih Wash to the north, and a former pond on vacant land to the east, bordered by Black Creek.

BACKGROUND

The NFPI Site was developed beginning in 1958, and operated as a lumber processing facility from 1962 to 1995. Activities at the Site included lumber treatment, process water treatment,

vehicle and equipment maintenance, and solid waste disposal. Additionally, underground storage tanks (USTs) may be present at the Site.

A Phase I Environmental Site Assessment (ESA) was conducted at the former NFPI facility in 2001 and updated in 2012 (DSA, 2012). The ESAs outlined potential contamination at the former NFPI facility, which operated from 1962 to 1995 as a lumber processing facility. Potential contamination at the former NFPI facility is related to use of lubricants, solvents, antifreeze, adhesives, resins, acids and corrosives, and petroleum-based fuels. Sulfuric acid and other corrosives were used to treat process water in the northeast portion of the former NFPI facility. Parts of the eastern portion of the former NFPI facility were used to conduct maintenance on large equipment. Vehicle maintenance pits were observed to contain discolored water with floating free products in 1997 and 1999. Vehicle maintenance pits were again reported to contain discolored water in 2012. Solid waste disposal has occurred in parts of the former NFPI facility. Eight of 12 known USTs on the former NFPI facility have been removed and there is a visual indication of total petroleum hydrocarbon impacts in soil. Two aboveground storage tanks (ASTs) on the former NFPI facility have leaked onto the ground surface. One of the leaking ASTs contains waste solvent and the other contains an unknown liquid (DSA, 2012). Soil contaminated with dichlorobenzene and other solvents have been excavated from the former NFPI facility. Asbestos-containing materials (ACM) are present at the facility. Air quality sampling was conducted by Navajo Nation EPA (NNEPA) after a fire in June 2012. NNEPA also collected photoionization detector readings at the Site in June 2012. The 2012 Phase I ESA indicated that photoionization detector results were "low" (DSA, 2012).

In February 2018, EPA and START performed preliminary asbestos sampling at the former Drying Kiln Building at the Site. This building was reported to contain ACM which had deteriorated and was being dispersed by the wind to the surrounding area. Due to safety concerns the building was not entered; however, building material samples were able to be collected from the exterior ground surface. A total of 15 samples were collected and analyzed for asbestos using EPA Method 600/R-93/116 with polarized light microscopy (PLM). Data obtained from the samples collected suggested the roofing material and a coating on the interior cement walls of the former Drying Kiln Building contained chrysotile asbestos at concentrations of greater than 1 percent.

In July 2018, EPA, Emergency and Rapid Response Services (ERRS), and START personnel participated in a Site walk with NNEPA Red Lake Chapter representatives, and other interested parties. This Site walk allowed for the ERRS subcontracted asbestos professional, Envision Environmental Solutions, LLC (EES), to perform a visual asbestos assessment and develop a potential sequence of asbestos removal operations for the former Drying Kiln Building located at the Site. The visual assessment suggested asbestos containing transite paneling was also present on the roof of the Drying Kiln Building. In addition, during the time of the Site walk, an ERRS subcontracted Professional Engineering Firm, Dekker/Perich/Sabatini (DPS), performed a visual structural evaluation of the former Drying Kiln Building. The overall condition of the building was described as fair to poor and it was recommended that a civil engineer and possibly additional engineering support be utilized if additional work is to be performed.

FIELD ACTIVITIES – JUNE 18, 2019

On June 18, 2019, EPA, ERRS, and START personnel participated in a Site walk with NNEPA. The Site walk was performed to further evaluate the building materials and the soil surrounding the former Drying Kiln Building for the presence of asbestos. In addition, an assessment to evaluate building material debris located throughout the Site for the presence of asbestos and metals contamination was performed during the Site walk. The sampling was performed by a certified asbestos building inspector. Sampling locations were selected by the EPA FOSC and the asbestos building inspector in the field to close data gaps associated with previous building material investigations associated with the former Drying Kiln Building, and to begin assessing other areas of the Site where building debris was identified.

To perform the assessment, START collected 42 bulk asbestos samples from the Site (**Figure 3**). Of the samples collected, thirteen samples were collected to further define the presence of ACM at the former Drying Kiln Building (**Figure 4**). The remaining 29 samples were collected as a limited assessment of building material debris associated with buildings historically demolished throughout the Site including the Main Particle Building, Power House, and Warehouse. START also collected composite soil samples following a grid pattern to evaluate potential asbestos contamination around the former Drying Kiln Building (**Figure 5**). In addition, one sample was collected from green-colored debris located in a debris pile at the demolished Main Particle Building for the analysis of metals (**Figure 3**). Analytical reports and chain-of-custody documentation are included in **Appendix B**.

The bulk asbestos samples collected at the Site were sealed in the appropriate sample container, assigned a discrete sample identification number, and submitted using proper chain-of-custody procedures. The bulk building material samples were submitted to EMSL Analytical, Inc. (EMSL) and analyzed by PLM by EPA Method 600/R-93/116. EMSL is an accredited laboratory in the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos fiber analysis.

To evaluate potential shallow asbestos soil contamination in the immediate vicinity of the former Drying Kiln Building, composite soil sampling was performed. The soil evaluation was performed by collecting composite samples in a grid pattern around the exterior of the Drying Kiln Building that consisted of an inner and outer ring. The inner ring of composite samples (NFPI-1 through NFPI-8) consisted of surface samples and shallow subsurface samples collected at a depth of 4-inches below ground surface (bgs). The inner ring of samples covered an area where significant visible suspected ACM was observed on the ground surface. The outer ring of composite samples (NFPI-9 through NFPI-16) were collected from only the surface. The outer ring extended 25 feet past the area where significant visible suspected ACM was observed.

Each composite soil sample was collected using a new disposable plastic trowel that was removed from a factory sealed bag. The composite samples were placed into a one-gallon zip-lock bag and then placed inside an additional zip-lock bag as a precaution. Each composite sample weighed approximately 2.0 kilograms (i.e., 4.4 pounds). The soil samples were submitted to EMSL and were analyzed by PLM using EPA Method 600/R-93/116 with milling preparation and the 400-point count procedure.

During the Site walk, the EPA FOSC identified a green discolored unknown solid waste located in the debris pile on the concrete slab of the demolished Main Particle Building. A grab sample of the material was collected by START. The sample was submitted to EMSL and analyzed for Total Analyte List (TAL) Metals by EPA Methods 3050B/6010D.

ANALYTICAL RESULTS

A total of 42 bulk samples were collected and 46 separate layers were analyzed. Of the 13 bulk samples collected to further evaluate the building materials associated with the former Drying Kiln Building, six samples contained asbestos at concentrations ranging from 2% to 15% chrysotile. Of the remaining 29 bulk samples collected from the debris located throughout the Site, seven samples contained asbestos at concentrations ranging from 3% to 60% chrysotile. Chrysotile, positive detections are show below in Table 1. **Figure 3** and **Figure 4** show the location of the asbestos bulk samples collected at the Site.

Table 1
Bulk Asbestos Detections – June 2019

Sample Number	Description	Appearance	Asbestos (%/Type)
H2-1-Floor Tile	Floor Tile with Mastic - Brown/ Gray/Black	Brown/Gray/Black Non-Fibrous Homogeneous	**Tile – 3% Chrysotile Mastic – 6% Chrysotile**
H3-1	Asphaltic Roofing Debris - Black	Black Fibrous Homogeneous	**60% Chrysotile**
H11-1	Black Mastic	Black Non-Fibrous Homogeneous	**5% Chrysotile**
H11-2	Black Mastic	Black/Silver Non-Fibrous Homogeneous	**7% Chrysotile**
H14-1	Black Coating on Metal Panel	Gray/Black Fibrous Homogeneous	**12% Chrysotile**
H16-1	Black Flat Debris	Black Fibrous Homogeneous	**15% Chrysotile**
H19-1	Transite Panel	Gray Fibrous Homogeneous	**18% Chrysotile**
*H21-1	Transite Corrugated Roofing	Gray Fibrous Homogeneous	**10% Chrysotile**
*H21-2	Transite Corrugated Roofing	Gray Fibrous Homogeneous	**15% Chrysotile**
*H24-1	Coating on Interior Metal - Black	Black/Silver Non-Fibrous Heterogeneous	**2% Chrysotile**

Sample Number	Description	Appearance	Asbestos (%/Type)
*H24-2	Coating on Interior Metal - Black	Black/Silver Non-Fibrous Heterogeneous	**3% Chrysotile**
*H26-1	Black Asphaltic Roofing	Black Fibrous Homogeneous	**3% Chrysotile**
*H26-2	Black Asphaltic Roofing	Black/Silver Non-Fibrous Homogeneous	**3% Chrysotile**

Notes:
* = Collected from the former Drying Kiln Building

A total of 24 composite soil samples were collected from the surface (16 samples) and shallow subsurface soil (8 samples) located in the immediate vicinity of the former Drying Kiln Building to evaluate for the presence of asbestos. Three of the surface samples (one from the inner ring and two from the outer ring) submitted for analysis had detectable levels of asbestos ranging from <0.25% to 1.25%. None of the samples collected from the shallow subsurface had detectable concentrations of asbestos. Table 2 below shows positive detections of asbestos.

Table 2
Soil Asbestos Detections – June 2019

Sample	Description	Appearance	% Type
NFPI-1-0	Soil	Brown Non-Fibrous Homogeneous	1.25% Actinolite
NFPI-12-0	Soil	Brown Non-Fibrous Homogeneous	<0.25% Chrysotile
NFPI-14-0	Soil	Brown Non-Fibrous Homogeneous	<0.25% Chrysotile

One grab sample (NFPI-particlebldg-greendebris) was collected from a green discolored, unknown solid waste located at the demolished Main Particle Building and analyzed for TAL metals. Table 3 below shows metals that were detected above the laboratory reporting limit. The sample was later run for Toxicity Characteristic Leaching Procedure (TCLP) analysis for the Resource Conservation and Recovery Act (RCRA) 8 Metals list. All analytes were reported as not detected over the laboratory reporting limit and are shown in Table 3.

Table 3
Sample NFPI-particlebldg-greendebris Metal Detections – June 2019

Metal	Total Metals Concentration (mg/kg)	TCLP Concentration (mg/L)
Aluminum	3,400 D	NA
Arsenic	ND (4.4)	ND (0.10), D
Barium	ND (22)	ND (0.50), D
Cadmium	ND (0.88)	ND (0.10), D
Chromium	220	ND (0.10), D

Metal	Total Metals Concentration (mg/kg)	TCLP Concentration (mg/L)
Iron	630	NA
Lead	7.0	ND (0.10), D
Mercury	ND (0.047)	ND (0.0020)
Selenium	ND (4.4)	ND (0.10), D
Silver	ND (2.2)	ND (0.10), D
Vanadium	11	NA
Zinc	12	NA

Notes:
D = Dilution
mg/kg = milligrams per kilogram
mg/L = milligrams per liter
NA = not analyzed
ND = not detected over the reporting limit shown in parentheses
TCLP = Toxicity Characteristic Leaching Procedure

DISCUSSION

Based on the analytical results of the samples collected during this inspection and previous Site walks, building materials are present at the Site with an asbestos content in excess of 1%. The ACM can be found scattered throughout the site, in debris piles associated with demolished buildings, in the kiln building, and in the area around the kiln building.

Debris piles associated with the demolished Main Particle Building, demolished Power House, and demolished Warehouse were sampled and confirmed to contain ACM. Examples of materials include black mastic, black coating on metal, and transite panels. These types of materials were also observed scattered throughout the site at various locations during the site walk.

Building materials associated with the former Drying Kiln Building that have an asbestos content in excess of 1%. Because the concentrations are above 1%, the materials are designated as ACM. Table 4 below serves to provide an estimate for the quantities of building materials estimated to contain asbestos. The estimates are based on a structure size of approximately 180 feet in length by 108 feet in width by 25 feet in height. In addition, access to the interior of the building was limited due to safety concerns. However, based on observations, it appears the asbestos coating that is present on the interior walls of the structure is also present on all metal beams and piping located in the interior of the Drying Kiln Building. The concrete of the structure as well as the concrete secondary roofing around the skylights were not identified to contain asbestos in the samples submitted for analysis.

Table 4
Former Drying Kiln Building Material Estimates – June 2019

Material Type	Quantity
Asphaltic Roofing with Mastic	19,440 SF
Coating on Interior Concrete Walls	58,500 SF
Coating on Metal Beams and Pipes	25,000 SF*
Corrugated Transite Roofing	19,440 SF

Notes:
SF = Square Feet
* = Limited data available due to access concerns

The building materials identified to be ACM associated with the former Drying Kiln Building have deteriorated and have been dispersed by the wind to the surrounding area. Visibly identifiable ACM debris was observed in significant quantities at varying distances along each side of the structure ranging from 20 feet to 75 feet. The most significant presence of ACM debris appears to be located on the north and east side of the structure.

To further evaluate the presence of asbestos contamination resulting from wind-dispersed ACM, composite soil sampling was performed. Of the concentrations of asbestos detected, one sample (NFPI-1-0) representative of surface soil adjacent to and west of the former Drying Kiln Building, contained an asbestos concentration of 1.25% actinolite. As actinolite was not present in the samples collected from the building materials associated with the Drying Kiln Building, START requested that EMSL attempt to identify the source of the actinolite in the sample. Based on information provided by EMSL, it appears the actinolite identified in the sample is associated with vermiculite/mica chips bound in a plaster building material that was included in the soil sample. A source for the actinolite contamination at the Site has not been determined.

Trace levels of chrysotile asbestos (<0.25%) were also detected in two surface soil samples (NFPI-12-0 and NFPI-14-0) collected from outside the area of where significant ACM debris was observed. Asbestos was not detected in the remaining surface and subsurface samples collected. As a result, it appears asbestos soil contamination is minimal and limited to surface soils at the Site. However, asbestos soil contamination may be present at trace concentrations beyond where significant quantities of ACM were visibly identifiable.

An asbestos evaluation was performed for various building material debris that was observed throughout the Site as a result of historical demolition activities. The assessment identified building material debris that contained asbestos in concentrations of greater than 1% at various locations throughout the Site. The ACM identified included asphalt roofing, floor tile, mastics, and transite paneling. The remnants of these ACMs appear to be present in various amounts throughout the Site. A majority of the identified ACM is located in and around the Drying Kiln Building as well as the building debris piles. Some of the ACM is scattered and is not near one of these large sources. Further assessment is warranted to determine if removal actions are necessary to remove risk from these materials.

One sample was collected of a green discolored, unknown solid and submitted for analysis of TAL metals. The data obtained from the sample were evaluated to ascertain if it exhibited the toxicity characteristic in accordance with 40 Code of Federal Regulations (CFR) – Chapter I – Part 261. For the purpose of the evaluation, the waste was assumed to be 100% solid so the total constituent concentration detected could be divided by 20 thereby generating a maximum theoretical leachate concentration to compare to the appropriate regulatory limit. Based on this estimation, chromium was detected at 220 mg/kg and estimated to be 11 mg/L was is above the regulatory limit of 5.0 mg/L and thereby theoretically exhibits the toxicity characteristic of a D007 hazardous waste. No other metals were estimated to exceed the toxicity characteristic. The sample was reanalyzed for the RCRA 8 Metals List by TCLP. None of the analytes were detected above their respective laboratory reporting limit. Therefore the sample is determined not to exhibit the toxicity characteristic.

SUMMARY

EPA tasked START to provide support during a NFPI Removal Assessment in Navajo, New Mexico. The assessment was performed to further evaluate the building materials and the soil surrounding the former Drying Kiln Building for the presence of asbestos. In addition, a preliminary assessment to evaluate building material debris located throughout the Site for the presence of asbestos and metals contamination was performed. Based on the analytical results of the samples collected during this inspection and the previous Site walks, building materials are present associated with the former Drying Kiln Building that are ACM. These materials include asphaltic roofing with mastic, corrugated transite roofing, and coatings on the interior concrete walls and metal infrastructure.

To further evaluate the presence of asbestos contamination resulting from wind-dispersed ACM, composite soil sampling was performed around the exterior of the former Drying Kiln Building. Soil samples were collected from the surface and shallow subsurface (4-inches bgs). Three of the composite surface samples submitted for analysis had detectable levels of asbestos ranging from <0.25% to 1.25%. None of the samples collected from the shallow subsurface had detectable concentrations of asbestos.

An asbestos evaluation was performed for remnant building debris that was observed at various locations throughout the Site as a result of historical demolition activities. The assessment identified building material debris that contained asbestos in concentrations of greater than 1% at various locations throughout the Site. Based on the data obtained to date, additional assessment activities appear to be required to ensure remnant debris from the historical demolition work is managed and disposed of appropriately.

August 12, 2019

One grab sample was collected of a green discolored, unknown solid located in a waste pile at the demolished Main Particle Building and analyzed for TAL metals and TCLP RCRA 8 metals. Based on the analytical data obtained, it appears the material does not exhibit the toxicity characteristic of a hazardous waste.

Should you have any questions regarding the information presented in this letter report, please contact me at (480) 477-4918, or at Greg.Roussos@WestonSolutions.com.

Respectfully,

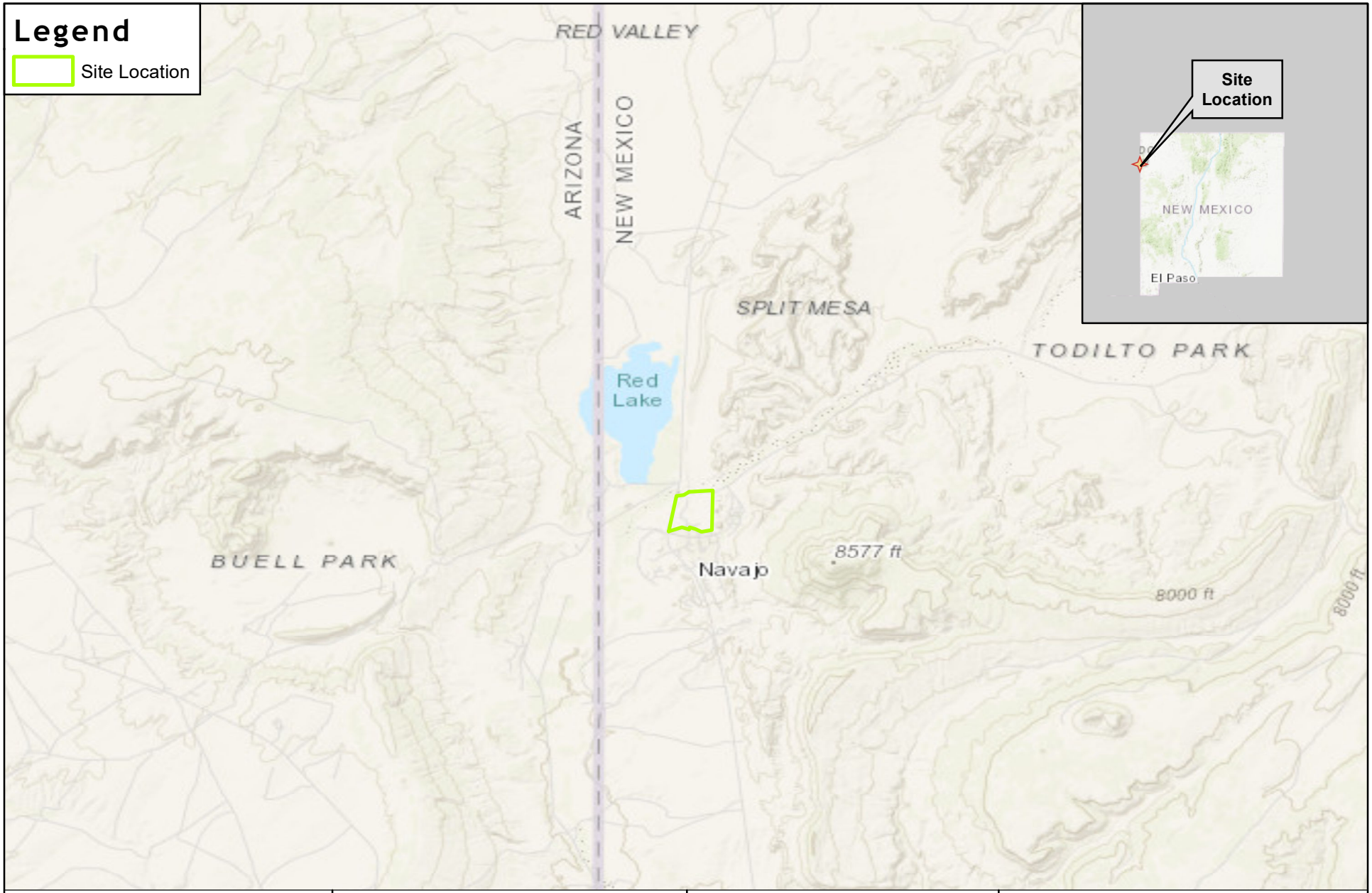
WESTON SOLUTIONS, Inc.

Greg Roussos
START Project Manager

Attachments:
A – Figures
B – Analytical Data Packages
C – Photographic Log

cc: WESTON START DCN File

ATTACHMENT A
FIGURES



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EPA Region 9
Pacific Southwest

FIGURE 1
SITE LOCATION
Former Navajo Forest Products Industries
Navajo, McKinley County, New Mexico

Contract: EP-S5-13-02; **TDD:** 0020/1302-T20-R9-19-05-0001

Document Control Number: 0231-08-ACHS

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FIGURE 2
SITE LAYOUT
Former Navajo Forest Products Industries
Navajo, McKinley County, New Mexico

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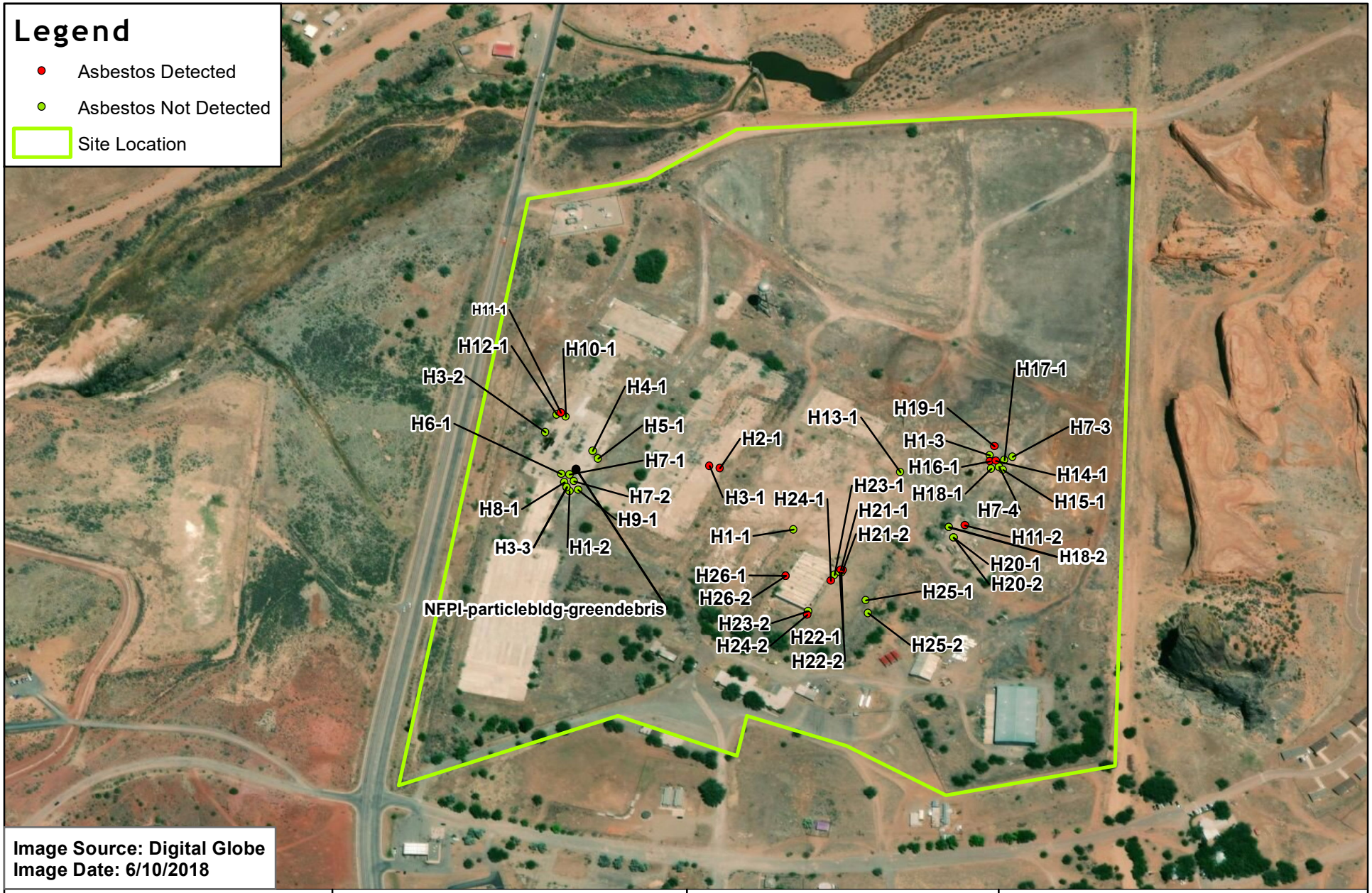

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FIGURE 3
JUNE 2019
MATERIAL SAMPLING LOCATIONS
Former Navajo Forest Products Industries
Navajo, McKinley County, New Mexico

Contract: EP-S5-13-02; **TDD:** 0020/1302-T20-R9-19-05-0001

Document Control Number: 0231-08-ACHS

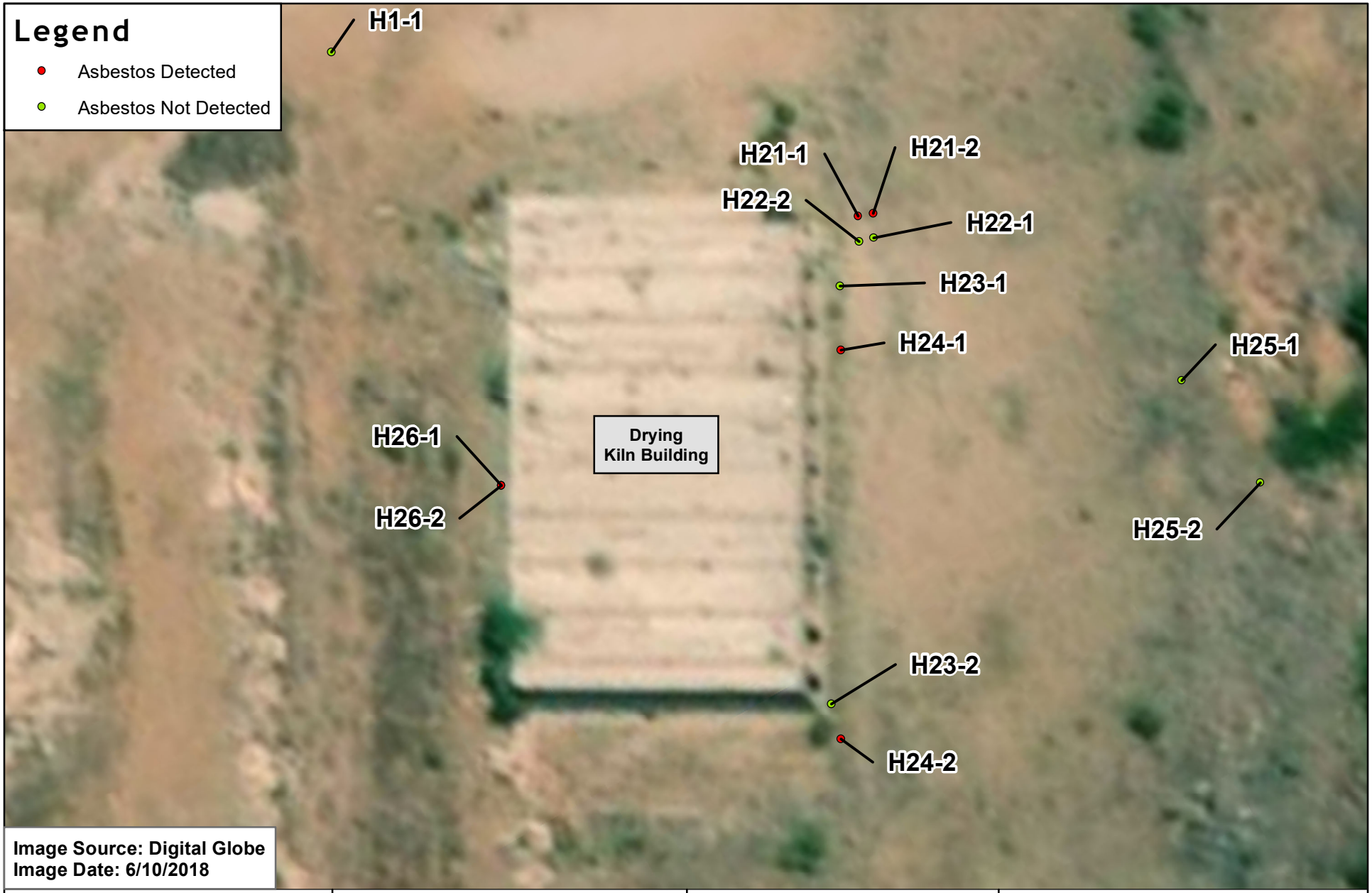

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FIGURE 4

JUNE 2019 FORMER DRYING KILN BUILDING MATERIAL SAMPLING LOCATIONS Former Navajo Forest Products Industries Navajo, McKinley County, New Mexico

Contract: EP-S5-13-02; **TDD:** 0020/1302-T20-R9-19-05-0001

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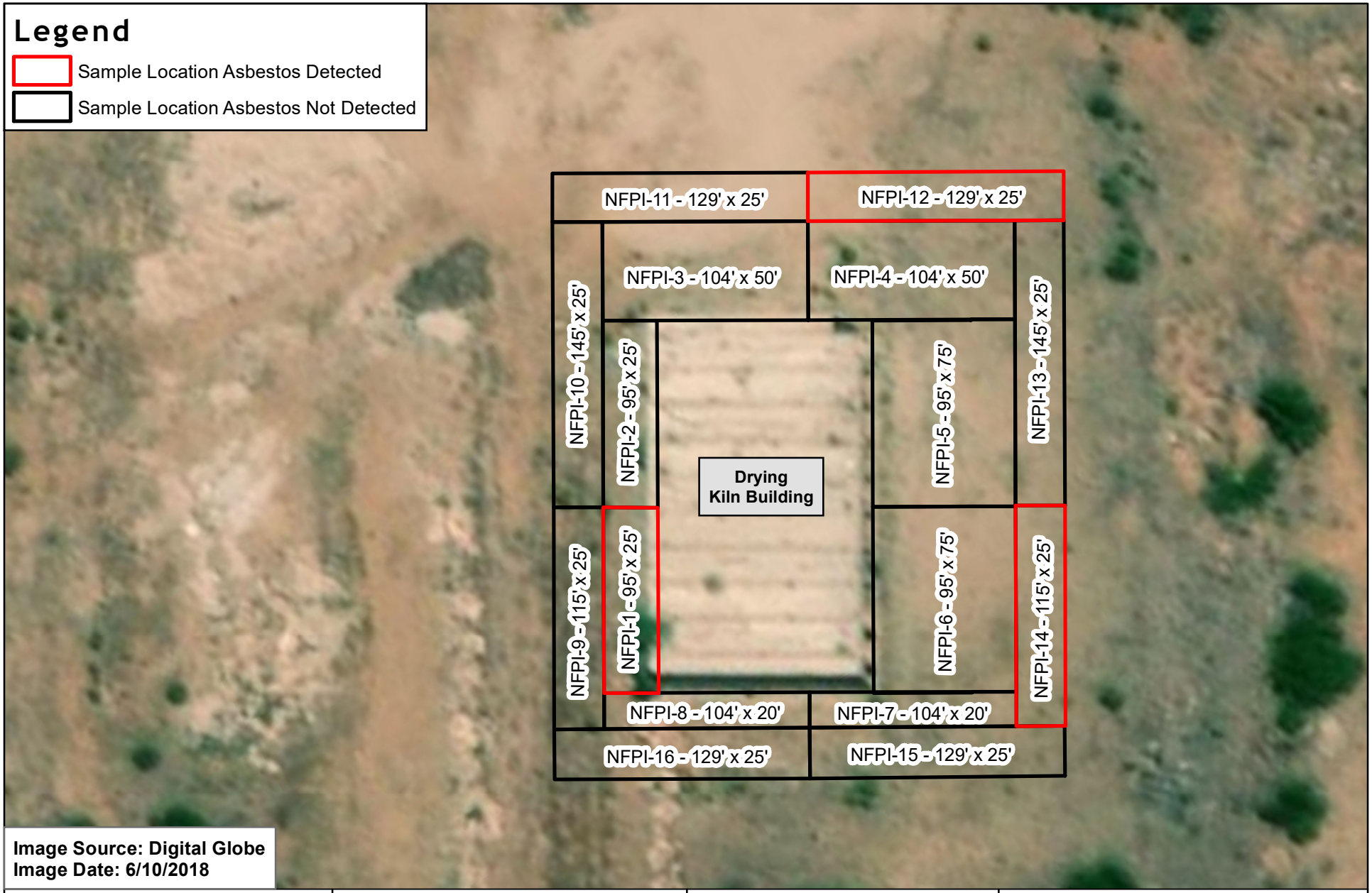

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FIGURE 5
JUNE 2019 FORMER DRYING KILN BUILDING SOIL SAMPLING LOCATIONS
Former Navajo Forest Products Industries
Navajo, McKinley County, New Mexico

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ATTACHMENT B
ANALYTICAL DATA PACKAGES

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EMSL Order: 041917218
Customer ID: WEST25
Customer PO: 0098949
Project ID:

Attention: Gregory Roussos
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Received: 06/20/2019 10:45 AM
Analysis Date: 06/24/2019 - 06/27/2019
Collected: 06/18/2019

Test Report: Asbestos Analysis of Soils via EPA 600/R-93/116 Method using PLM and Milling Prep. Quantitation using 400 Point Count Procedure

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
NFPI-1-0 *041917218-0001*	Soil	Brown Non-Fibrous Homogeneous		98.8% Non-fibrous (Other)	**1.25% Actinolite**
NFPI-1-4 *041917218-0002*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-2-0 *041917218-0003*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-2-4 *041917218-0004*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-3-0 *041917218-0005*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI -3-4 *041917218-0006*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-4-0 *041917218-0007*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-4-4 *041917218-0008*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-5-0 *041917218-0009*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-5-4 *041917218-0010*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**

Initial report from: 06/27/2019 20:08:53

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
NFPI-6-0 *041917218-0011*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-6-4 *041917218-0012*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-7-0 *041917218-0013*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-7-4 *041917218-0014*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-8-0 *041917218-0015*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-8-4 *041917218-0016*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-9-0 *041917218-0017*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-10-0 *041917218-0018*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-11-0 *041917218-0019*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**None Detected**
NFPI-12-0 *041917218-0020*	Soil	Brown Non-Fibrous Homogeneous	2% Cellulose	98.0% Non-fibrous (Other)	**<0.25% Chrysotile**

Initial report from: 06/27/2019 20:08:53

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Test Report: Asbestos Analysis of Soils via EPA 600/R-93/116 Method using PLM and Milling Prep. Quantitation using 400 Point Count Procedure

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
NFPI-13-0 *041917218-0021*	Soil	Brown Non-Fibrous Homogeneous	2% Cellulose	98.0% Non-fibrous (Other)	**None Detected**
NFPI-14-0 *041917218-0022*	Soil	Brown Non-Fibrous Homogeneous		100.0% Non-fibrous (Other)	**<0.25% Chrysotile**
NFPI-15-0 *041917218-0023*	Soil	Brown Non-Fibrous Homogeneous	2% Cellulose	98.0% Non-fibrous (Other)	**None Detected**
NFPI-16-0 *041917218-0024*	Soil	Brown Fibrous Homogeneous	3% Cellulose	97.0% Non-fibrous (Other)	**None Detected**

Analyst(s)

Chelsey Donnelly (5)
Will DiBella (19)

Benjamin Ellis, Laboratory Manager
or other approved signatory

Initial report from: 06/27/2019 20:08:53

EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
http://www.EMSL.com / cinnasblab@EMSL.com

EMSL Order:	041917286
Customer ID:	WEST25
Customer PO:	0098949
Project ID:	

Attention:	Gregory Roussos	**Phone:**	(510) 788-3807
	Weston Solutions, Inc	**Fax:**	(510) 891-9710
	2300 Clayton Rd	**Received Date:**	06/20/2019 10:45 AM
	Suite 900	**Analysis Date:**	06/24/2019 - 06/27/2019
	Concord, CA 94520	**Collected Date:**	06/18/2019
Project:	NFPI II		

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
HI-1 *041917286-0001*	Fiberglass Material - Green	Green Fibrous Homogeneous	80% Glass	20% Non-fibrous (Other)	None Detected
HI-2 *041917286-0002*	Fiberglass Material - White	White Fibrous Homogeneous	80% Glass	20% Non-fibrous (Other)	None Detected
HI-3 *041917286-0003*	Fiberglass Material - Pinkish Orange	Pink/Orange Fibrous Homogeneous	50% Glass	50% Non-fibrous (Other)	None Detected
H2-1-Floor Tile *041917286-0004*	Floor Tile - Gray/Black	Brown/Gray Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
H2-1-Mastic *041917286-0004A*	Mastic	Black Non-Fibrous Homogeneous		94% Non-fibrous (Other)	6% Chrysotile
H3-1 *041917286-0005*	Asphaltic Roofing Debris - Black	Black Fibrous Homogeneous		40% Non-fibrous (Other)	60% Chrysotile
H3-2 *041917286-0006*	Asphaltic Roofing Debris - Black	Black Fibrous Homogeneous	65% Cellulose	35% Non-fibrous (Other)	None Detected
H3-3 *041917286-0007*	Asphaltic Roofing Debris - Black	Black Fibrous Homogeneous	30% Glass	70% Non-fibrous (Other)	None Detected
H4-1-Fiberglass *041917286-0008*	Fiberglass - Black	Black Fibrous Homogeneous	40% Glass	60% Non-fibrous (Other)	None Detected
H4-1-Insulation *041917286-0008A*	Insulation	Brown Fibrous Homogeneous	10% Glass	90% Non-fibrous (Other)	None Detected
H5-1 *041917286-0009*	Foam - Orange	Orange Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H6-1 *041917286-0010*	Mica Appearing Material - Black/Clear	Black/Clear Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
H7-1 *041917286-0011*	Robinson Brick - Orange	Orange Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H7-2 *041917286-0012*	Robinson Brick - Tan	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H7-3 *041917286-0013*	Thin Brick - Yellow	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H7-4 *041917286-0014*	Red Brick	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 06/24/2019 13:15:56

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EMSL Order: 041917286
Customer ID: WEST25
Customer PO: 0098949
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
H8-1 *041917286-0015*	Fiberglass Board with Red Interior	White/Red Non-Fibrous Homogeneous	50% Glass	50% Non-fibrous (Other)	None Detected
H9-1 *041917286-0016*	Brick with Pink Coating	Gray/Pink Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H10-1 *041917286-0017*	Mastic on Brick - Black	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H11-1 *041917286-0018*	Black Mastic	Black Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
H11-2 *041917286-0019*	Black Mastic	Black/Silver Non-Fibrous Homogeneous		93% Non-fibrous (Other)	7% Chrysotile
H12-1 *041917286-0020*	Asphaltic Roofing with Green Coating	Black/Green Non-Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
H13-1 *041917286-0021*	Rubber Belt - Yellow/Tan	Gray/Tan/Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H14-1 *041917286-0022*	Black Coating on Metal Panel	Gray/Black Fibrous Homogeneous	15% Cellulose	73% Non-fibrous (Other)	12% Chrysotile
H15-1 *041917286-0023*	Possible Floor Tile - Aqua Green	Green Non-Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
H16-1 *041917286-0024*	Black Flat Debris	Black Fibrous Homogeneous		85% Non-fibrous (Other)	15% Chrysotile
H17-1 *041917286-0025*	Possible Brake Shoe Material	Brown/Gray Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
H18-1 *041917286-0026*	Couplers - Black	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H18-2 *041917286-0027*	Couplers - Black	Black Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
H19-1 *041917286-0028*	Transite Panel	Gray Fibrous Homogeneous		82% Non-fibrous (Other)	18% Chrysotile
H-20-1-Cement Paneling *041917286-0029*	Cement Paneling - Gray	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H-20-1-Mastic *041917286-0029A*	Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H-20-2-Cement Paneling *041917286-0030*	Cement Paneling - Gray	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H-20-2-Mastic *041917286-0030A*	Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 06/24/2019 13:15:56

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EMSL Order: 041917286
Customer ID: WEST25
Customer PO: 0098949
Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
H21-1 *041917286-0031*	Transite Corrugated Roofing	Gray Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
H21-2 *041917286-0032*	Transite Corrugated Roofing	Gray Fibrous Homogeneous		85% Non-fibrous (Other)	15% Chrysotile
H22-1 *041917286-0033*	Secondary Roofing around Sky Lights - Tan	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H22-2 *041917286-0034*	Secondary Roofing around Sky Lights - Tan	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H23-1 *041917286-0035*	Exterior Concrete - Gray	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H23-2 *041917286-0036*	Exterior Concrete - Gray	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
H24-1 *041917286-0037*	Coating on Interior Metal - Black	Black/Silver Non-Fibrous Heterogeneous		98% Non-fibrous (Other)	2% Chrysotile
H24-2 *041917286-0038*	Coating on Interior Metal - Black	Black/Silver Non-Fibrous Heterogeneous		97% Non-fibrous (Other)	3% Chrysotile
H25-1 *041917286-0039*	Felt Debris - Gray	Gray Fibrous Homogeneous	70% Synthetic	30% Non-fibrous (Other)	None Detected
H25-2 *041917286-0040*	Felt Debris - Gray	Gray Fibrous Homogeneous	70% Synthetic	30% Non-fibrous (Other)	None Detected
H26-1 *041917286-0041*	Black Asphaltic Roofing	Black Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
H26-2 *041917286-0042*	Black Asphaltic Roofing	Black/Silver Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile

Analyst(s)
Andrew Burke (30)
Shelby Baker (16)

Benjamin Ellis, Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method"), but augmented with procedures outlined in the 1993 ("final") version of the method. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. All samples received in acceptable condition unless otherwise noted. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367, LA #04127

Initial report from: 06/24/2019 13:15:56

EMSL Analytical, Inc.
200 Route 130 North, Cinnaminson, NJ 08077
Phone: (856) 303-2500 Fax: (856) 858-4571 Email: EnvChemistry2@emsl.com

Attn: **Gregory Roussos**
Weston Solutions, Inc
2300 Clayton Rd
Suite 900
Concord, CA 94520
Phone: (510) 788-3807
Fax: (510) 891-9710

7/2/2019

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 6/25/2019. The results are tabulated on the attached data pages for the following client designated project:

NFPI

The reference number for these samples is EMSL Order #011907807. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 303-2500.

Approved By:

Phillip Worby, Environmental Chemistry
Laboratory Director

The test results contained within this report meet the requirements of NELAP and/or the specific certification program that is applicable, unless otherwise noted.
NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA ELAP 1877

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EMSL Order:	011907807
CustomerID:	WEST25
CustomerPO:	0098949
ProjectID:	

Attn: **Gregory Roussos**
Weston Solutions, Inc
2300 Clayton Rd
Suite 900
Concord, CA 94520

Phone: (510) 788-3807
Fax: (510) 891-9710
Received: 06/25/19 9:30 AM

Project: **NFPI**

Analytical Results

Client Sample Description NFPI-particlebldg-greendebris ***Collected:*** 6/18/2019 4:00:00 PM ***Lab ID:*** *011907807-0001*

Method	*Parameter*	*Result*	*RL*	*Units*	*Prep Date & Analyst*		*Analysis Date & Analyst*	
METALS								
3050B/6010D	Aluminum	3400 D	110	mg/Kg	6/27/2019	DM	07/01/19 14:27	DM
3050B/6010D	Antimony	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Arsenic	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Barium	ND	22	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Beryllium	ND	0.88	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Cadmium	ND	0.88	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Calcium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Chromium	220	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Cobalt	ND	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Copper	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Iron	630	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Lead	7.0	2.2	mg/Kg	6/27/2019	DM	07/01/19 13:54	DM
3050B/6010D	Magnesium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Manganese	ND	3.3	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Nickel	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Potassium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Selenium	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Silver	ND	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Sodium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Thallium	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Vanadium	11	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Zinc	12	4.4	mg/Kg	6/27/2019	DM	07/01/19 13:54	DM
7471B	Mercury	ND	0.047	mg/Kg	6/27/2019	PV	06/28/19 0:00	PV

Definitions:

MDL - method detection limit
J - Result was below the reporting limit, but at or above the MDL
ND - indicates that the analyte was not detected at the reporting limit
RL - Reporting Limit (Analytical)
D - Dilution

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8/8/2019

The following analytical report covers the analysis performed on samples submitted to EMSL Analytical, Inc. on 6/25/2019. The results are tabulated on the attached data pages for the following client designated project:

NFPI

The reference number for these samples is EMSL Order #011907807. Please use this reference when calling about these samples. If you have any questions, please do not hesitate to contact me at (856) 303-2500.

Approved By:

Phillip Worby, Environmental Chemistry
Laboratory Director

The test results contained within this report meet the requirements of NELAP and/or the specific certification program that is applicable, unless otherwise noted.
NELAP Certifications: NJ 03036, NY 10872, PA 68-00367, CA ELAP 1877

Report amended 08/08/2019 17:23:38 Replaces initial report from 07/02/2019 12:35:03

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Phone: (510) 788-3807
Fax: (510) 891-9710
Received: 06/25/19 9:30 AM

Project: **NFPI**

Analytical Results

Client Sample Description NFPI-particlebldg-greendebris ***Collected:*** 6/18/2019 4:00:00 PM ***Lab ID:*** *011907807-0001*

Method	*Parameter*	*Result*	*RL*	*Units*	*Prep Date & Analyst*		*Analysis Date & Analyst*	
METALS								
3050B/6010D	Aluminum	3400 D	110	mg/Kg	6/27/2019	DM	07/01/19 14:27	DM
3050B/6010D	Antimony	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Arsenic	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Barium	ND	22	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Beryllium	ND	0.88	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Cadmium	ND	0.88	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Calcium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Chromium	220	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Cobalt	ND	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Copper	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Iron	630	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Lead	7.0	2.2	mg/Kg	6/27/2019	DM	07/01/19 13:54	DM
3050B/6010D	Magnesium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Manganese	ND	3.3	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Nickel	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Potassium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Selenium	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Silver	ND	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Sodium	ND	220	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Thallium	ND	4.4	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Vanadium	11	2.2	mg/Kg	6/27/2019	DM	06/28/19 16:38	DM
3050B/6010D	Zinc	12	4.4	mg/Kg	6/27/2019	DM	07/01/19 13:54	DM
TCLP 1311/6010D	Arsenic	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Barium	ND D	0.50	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Cadmium	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Chromium	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Lead	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Selenium	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/6010D	Silver	ND D	0.10	mg/L	8/7/2019	JD	08/08/19 14:38	DM
TCLP 1311/7470A	Mercury	ND	0.0020	mg/L	8/7/2019	SW	08/07/19 0:00	SW
7471B	Mercury	ND	0.047	mg/Kg	6/27/2019	PV	06/28/19 0:00	PV

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ATTACHMENT C
PHOTOGRAPHIC LOG

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
1	1/20/2018

Direction Photo Taken:

West

Description:

Drying Kiln Building at Former NFPI.

Photo No.	Date:
2	1/20/2018

Direction Photo Taken:

West

Description:

Bay 10 of the Drying Kiln Building.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
3	6/18/2019

Direction Photo Taken:

South

Description:

Debris pile located on the concrete slab of the former Particle Building.

Photo No.	Date:
4	6/18/2019

Direction Photo Taken: South

Description:

Small debris pile on the northern portion of the former Particle Building.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
5	6/18/2019

Direction Photo Taken: West

Description:

Sample NFPI-particlebldg-greendebris collected from the large debris pile in the former Particle Debris building.

Photo No.	Date:
6	6/18/2019

Direction Photo Taken: West

Description:

Sample H14-1, black coating on metal panel, located near former Power House.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
7	6/18/2019

Direction Photo Taken:

South

Description:

Overview of former Power House Building.

Photo No.	Date:
8	6/18/2019

Direction Photo Taken:

East

Description:

Debris pile adjacent to the former Power House Building.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
9	6/18/2019

Direction Photo Taken:

North

Description:

Trailer and large metal pipes on the former Warehouse Building. Sample H11-2 located on trailer.

Photo No.	Date:
10	6/18/2019

Direction Photo Taken:

Down

Description:

Transite panel and concrete from the roof of the Drying Kiln Building, sample H21-1.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
11	1/20/2018

Direction Photo Taken: North

Description:

Roof of the Drying Kiln Building.

Photo No.	Date:
12	1/20/2018

Direction Photo Taken: South

Description:

Roof of the Drying Kiln Building.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Former Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
13	6/18/2019

Direction Photo Taken: Northwest

Description:

View inside Bay 10 of the former Drying Kiln building with the black coating peeling off the walls (Sample H24-1 and H24-2).

Photo No.	Date:
14	7/19/2018

Direction Photo Taken: West

Description:

Large pieces of reinforced concrete adjacent to the Drying Kiln Building.

PHOTOGRAPH LOG

Project Name:	Site Location:	TDD No.:
NFPI Removal Assessment	Navajo, New Mexico	0020/1302-T20-R9-19-05-0001

Photo No.	Date:
15	6/18/2019

Direction Photo Taken: Down

Description:

Examples of black asphaltic roofing identified throughout the site. Results for H3-1 are 60% Chrysotile, H3-2 and H3-3 were ND.

Photo No.	Date:
16	6/18/2019

Direction Photo Taken: Down

Description:

Sample H2-1 is floor tile with 3% Chrysotile and mastic is 6% Chrysotile.

Sample H16-1 is flat black debris with 15% Chrysotile.