

**REMOVAL PROGRAM  
PRELIMINARY ASSESSMENT/  
SITE INVESTIGATION REPORT  
FOR THE  
FORMER ROCKBESTOS SITE  
CLINTON, WORCESTER COUNTY, MASSACHUSETTS  
31 JANUARY 2024 AND 24 APRIL 2024**

Prepared For:

U.S. Environmental Protection Agency  
Region I  
Superfund and Emergency Management Division  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

CONTRACT NO. 68HE0120D0001

TASK ORDER NO. 68HE0120F0027

TO/AD NO.: TOFP-01-23-10-0001

TASK NO.: 0200

DC NO.: R-50800

Submitted By:

Weston Solutions, Inc.  
Region I  
Superfund Technical Assessment and Response Team  
101 Billerica Avenue, Building 5, Suite 103  
North Billerica, Massachusetts 01862

June 2024

## **TABLE OF CONTENTS**

I. Preliminary Assessment/Site Investigation Forms

II. Narrative Chronology

III. Appendices

Appendix A – Figures

Appendix B – Tables

Appendix C – Photo-documentation Log

Appendix D – Analytical Data and Chain-of-Custody Record

## I. Preliminary Assessment/Site Investigation Forms



## REMOVAL PRELIMINARY ASSESSMENT

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### Site Access

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**Authorizing Person:** Michael Ward (Town Administrator)

**Date:** 29 November 2023      ☒ **Obtained**      ☐ **Verbal**

**Telephone:** (978) 365-4120      ☐ **Not Obtained**      ☒ **Written**

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### Historical Preservation

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☐ **Site is Historically Significant or Eligible for Historic Preservation**

#### Contacts Identified

**1) State Historical Preservation Officer (SHPO)**

**Name:** Ms. Brona Simon

**Telephone:** 617-727-8470

**2) Tribal Historical Preservation Officer (THPO)**

**Name:**

**Telephone:**

**Comments:**

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### Physical Site Characterization

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#### **Background Information:**

The Former Rockbestos Site (the Site) is located at 172 Sterling Street, Clinton, Worcester County, Massachusetts (MA). The site is an approximately 8.4-acre property located in a mixed commercial/industrial and residential area near downtown Clinton. The Site is bordered to the north by Sterling Street and commercial properties, to the east by Greely Street and commercial properties, to the south by wooded areas and Rigbey Street, and to the west by wooded areas and commercial properties.

Based upon available information, the Site was historically occupied by manufacturers of wire and cable since 1936. Prior to 1936, the property was used to manufacture textile. Rockbestos-Surprenant Cable Corporation operated the mill at the property until 2003/2004, when it moved operations to Connecticut. The property has been abandoned since that time. In October 2006, the property was sold to Business Reform Foundation (later referred to as SeedAmerica Foundation). SeedAmerica Foundation never operated a business at the Site but contracted with RSG Contracting Corporation (RSG) to demolish the Site structures under a MassDEP permit in 2008. The contractor conducted an asbestos survey, and roofing of the structures was managed by the demolition contractor as asbestos-containing material (ACM) and transported and disposed of off-site. SeedAmerica Foundation then became insolvent and did not pay taxes to the Town of Clinton (the Town). In 2010, 172 Sterling Street, LLC, holder of a mortgage on the property, foreclosed on SeedAmerica. Snow Farm, LLC acquired the property on 15 April 2011, and transferred the property to Yu Hongli on 22 November 2011.

After taking the property in 2018, and gaining access to the property, the Town of Clinton contracted an environmental firm to conduct an American Society for Testing and Materials

## REMOVAL PRELIMINARY ASSESSMENT

(ASTM) Phase I/Phase II at the property. According to the Town and available sections of the report, ACM was not confirmed at the Site. In 2022, another asbestos survey was done where ACM was confirmed in one of six piles of debris that had previously been left on site, likely from the demolition of abandoned mill buildings at 172 Sterling Street. There is also remaining building slab and foundation located on site that may have asbestos floor tiles still affixed to it in poor repair and open to the elements.

More ACM material has been illegally dumped onto the Site since the Town took over the property, which led the Town to install a fence around the pile to prevent further unauthorized access, exposure, and dumping.

In 2022, an asbestos survey conducted by a Town of Clinton environmental firm identified ACM in one of seven piles of debris on site (identified as “Pile 6”) at concentrations of asbestos up to 23%. The six non-ACM piles were moved off site to the Town’s landfill.

A site inspection with the Town of Clinton and MassDEP identified a smaller, approximately 10-cubic-yard pile of ACM that had been dumped, by an unknown party, onto the back side of Pile 6 and some ACM-containing debris outside of Pile 7. Pile 6 is believed to be the remains of demolished buildings from the abandoned mill complex at 182 Sterling Street; the pile has been present for many years with medium-sized trees growing out of it, making it difficult to cover. The remaining building slab and foundation at the Site may also have asbestos floor tiles remaining affixed to it in poor repair and open to the elements.

MassDEP is currently working with an asbestos contractor and the Town to prepare a non-traditional work plan (NTWP) to remove and dispose of the smaller pile with the high concentrations of ACM. The small trees in Pile 6 were removed, and the pile was covered with plastic sheeting until it could be sampled by the EPA and transported off site. The illegally dumped small pile was also removed before the site walk and sampling.

The location is flat and primarily made of cement and gravel, although some older flooring is present in some locations. There are several holes on the site that lead to groundwater sources. The location has been used as an additional storage location for snow in the winter of 2023-2024. The plowing activities have pushed any remaining building materials into large mounds of snow, making them inaccessible until the snow is melted.

### **Description of Substances Possibly Present, Known or Alleged:**

Asbestos and/or ACM.

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### **Existing Analytical Data**

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### **( ) Real-Time Monitoring Data:**

### **(X) Sampling Data:**

Economic EnviroTechs Incorporated. 2022. Asbestos Identification Laboratory Analytical Results, Clinton, MA. February.

## REMOVAL PRELIMINARY ASSESSMENT

MassDevelopment and the Town of Clinton. 2023. Site Readiness Assessment, Clinton, MA. May.

Town of Clinton. 2021. Site Assessment Services Data Summary Report, Clinton, MA. February.

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### Potential Threat

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Description of potential hazards to environment and/or population-identify any of the criteria for a Removal Action (from NCP) that may be met by the site under 40 CFR 300.415 [b] [2].

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.
- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

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### Prior Response Activities

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( ) PRP                      (X) STATE                      ( ) FEDERAL                      (X) OTHER

#### Brief Description:

A site inspection with the Town of Clinton and MassDEP identified a smaller, approximately 10-cubic-yard pile of ACM that had been dumped, by an unknown party, onto the back side of Pile 6 and some ACM-containing debris outside of Pile 7. Six of the seven piles on site were removed, with Pile 6 and the illegally dumped pile remaining. MassDEP is currently working with an asbestos contractor and the Town to prepare an NTWP to remove and dispose of the smaller pile with the high concentrations of ACM. The small trees in Pile 6 were removed, and the pile was covered with plastic sheeting until it could be sampled by EPA and transported off site. The illegally dumped small pile was also removed before the site walk and sampling.

## REMOVAL PRELIMINARY ASSESSMENT

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### Priority for Site Investigation

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**(X) High**  
**Comments:**

**( ) Medium**

**Low ( )**

**None ( )**

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### Report Generation

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|-----------------------|--------------------------------|-----------------------|-----------------|
| <b>Originator:</b>    | Marina Kovalcin                | <b>Date:</b>          | 22 January 2024 |
| <b>Affiliation:</b>   | Weston Solutions, Inc. (START) | <b>Telephone:</b>     | (978) 621-1208  |
| <b>Contract No.</b>   | 68HE0120D0001                  | <b>Contract Name:</b> | START V         |
| <b>Task Order No.</b> | 68HE0120F0027                  | <b>Contract Name:</b> | FP-CRT          |
| <b>AD No.:</b>        | TOFP-01-23-10-0001             | <b>Task No.:</b>      | 0200            |





**EPA REGION I  
REMOVAL SITE INVESTIGATION**

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**Inspection Information**

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**Name:** Former Rockbestos Site      **Location:** 172 Sterling Street  
**Town:** Clinton      **County:** Worcester County      **State:** Massachusetts  
**Date of Inspection:** 31 January 2024      **Time of Inspection:** 0900 hours  
**Weather Conditions:** 35 ° Fahrenheit, Cloudy  
**Date of Inspection:** 24 April 2024      **Time of Inspection:** 1000 hours  
**Weather Conditions:** 48 ° Fahrenheit, Cloudy, some light rain  
**Site Status at Time of Inspection:**      ( ) ACTIVE      (X) INACTIVE  
**Comments:** The Site is currently vacant. The area was being used to store snow from snow removal activities during winter.

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**Agencies/Personnel Performing Inspection**

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|                     | <u><b>Names</b></u>  | <u><b>Program</b></u>   |
|---------------------|--|---|
| (X) EPA:            | Sherry Banks<br>Abdine Ouedraogo<br>Emma Dixon<br>Tyler Evans<br>Carlyn McGowan<br>Matthew Bosselait | U.S. Environmental Protection Agency (EPA) Region I, Emergency Planning and Response Branch (EPRB), On-Scene Coordinator (OSC). |
| (X) EPA Contractor: | Marina Kovalcin<br>Chris Dupree<br>Amy Klinger<br>Bonnie Mace<br>Tara LePage                         | Weston Solutions, Inc. (WESTON), Superfund Technical Assessment and Response Team V (START).                                    |
| (X) State:          | Mark Matys   | Massachusetts Department of Environmental Protection (MassDEP).   |
| (X) Town:           | Michael Ward<br>Phil Duffy   | Town of Clinton, Town Administrator.<br>Town of Clinton, Community and Economic Development Director.                           |

**Current Owner Based on Field Interview:** Town of Clinton

## REMOVAL SITE INVESTIGATION

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### Physical Site Characteristics

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| <u>Parameter</u>  | <u>Quantities/Extent</u>  |
|---|---|
| <input type="checkbox"/> Cylinders:                         |   |
| <input type="checkbox"/> Drums:                             |   |
| <input type="checkbox"/> Lagoons:                           |   |
| <input type="checkbox"/> Tanks:                             | <input type="checkbox"/> Above:   |
|   | <input type="checkbox"/> Below:   |
| <input checked="" type="checkbox"/> Asbestos:               | An asbestos-containing pile, known as "Pile 6", is located on the property surrounded by fencing and covered with sheeting. Additionally, there is building material present at the site that is most likely ACM as well. This material has been pushed into snow piles by plows and is not accessible. |
| <input checked="" type="checkbox"/> Piles:                  | Pile 6 likely contains ACM. The piles of snow where the building materials have been pushed to the perimeter of the site also likely contain ACM.   |
| <input type="checkbox"/> Stained Soil:                      |   |
| <input type="checkbox"/> Sheens:                            |   |
| <input type="checkbox"/> Stressed Vegetation:               |   |
| <input type="checkbox"/> Landfill:                          |   |
| <input checked="" type="checkbox"/> Population in Vicinity: | The Site is located in a mixed commercial/industrial and residential area.  |
| <input type="checkbox"/> Wells:                             | <input type="checkbox"/> Drinking:  |
|   | <input type="checkbox"/> Monitoring:  |
| <input type="checkbox"/> Other:                             |   |

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### Physical Site Observations

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The Site consists of a vacant lot that is generally flat and contains the remnant foundations from previously demolished industrial buildings. There were some portions with tile flooring remaining/exposed. The Site has a fence on the northern side along Sterling Street and the eastern side along Greeley Street. An entrance is located on the Sterling Street side of the fence. The remaining pile, Pile 6, is located to the left of the entrance and has additional fencing around it. Pile 6 has been covered with tarps which are secured using rocks.

As of 31 January 2024, the Site was used by the Town of Clinton to store excess snow from plowing activities. The plowing activities pushed any remaining building materials into large mounds of snow, making them inaccessible during the January sampling event.

As of 24 April 2024, the snow had melted and there were small pieces of debris visible on the vacant lot. Pile 6 remained encased in polyurethane sheeting surrounded by a fence with signs labeling the pile as hazardous.

## REMOVAL SITE INVESTIGATION

| Field Sampling and Analysis |                                |              |            |           |       |
|-----------------------------|--------------------------------|--------------|------------|-----------|-------|
| Matrix                      | Field Instrumentation Readings |              |            |           |       |
|                             | CGI/O <sub>2</sub> (%)         | RAD (μR/hr)  | PID (ppm)  | FID (ppm) | Other |
| <b>Background:</b>          | <b>0.0/20.9</b>                | <b>10-15</b> | <b>0.0</b> | <b>--</b> |       |
| <b>Air:</b>                 | 0.0/20.9                       | 10-15        | 0.0        |           |       |
| <b>Soil:</b>                |                                |              |            |           |       |
| <b>Surface Water:</b>       |                                |              |            |           |       |
| <b>Tanks:</b>               |                                |              |            |           |       |
| <b>Drums:</b>               |                                |              |            |           |       |
| <b>Vats:</b>                |                                |              |            |           |       |
| <b>Lagoons:</b>             |                                |              |            |           |       |
| <b>Spillage:</b>            |                                |              |            |           |       |
| <b>Run Off:</b>             |                                |              |            |           |       |
| <b>Piles:</b>               | 0.0/20.9                       | 10-15        | 0.0        | --        |       |
| <b>Sediments:</b>           |                                |              |            |           |       |
| <b>Groundwater:</b>         |                                |              |            |           |       |
| <b>Other:</b>               |                                |              |            |           |       |

CGI/O<sub>2</sub> (%) = Combustible Gas Indicator/Oxygen (percentage)  
 PID = PhotoIonization Detector (parts per million)

RAD (μR/hr) = Radiation (microRoentgens per hour)  
 FID (ppm) = Flame Ionization Detector (parts per million)

### Field Quality Control Procedures

**(X) SOP Followed**

**( ) Deviation from SOP**

**Comments:**

Sampling was conducted according to the site Sampling and Analysis Plan (SAP), prepared as a separate document entitled *Sampling and Analysis Plan for the Former Rockbestos Site, Clinton, Worcester County, MA*, dated January 2024.

### Description of Sampling Conducted

On 31 January 2024, START personnel collected 15 bulk asbestos samples (ACM-01 through ACM-14 and ACM-109) for asbestos analysis. All samples were submitted to EPA Laboratory Services and Applied Sciences Division (LSASD), New England Regional Laboratory (NERL) located in North Chelmsford, Massachusetts for asbestos analysis.

On 24 April 2024, START personnel collected 42 bulk asbestos samples (ACM-20 through ACM-61) for asbestos analysis. All samples were submitted to EPA LSASD NERL located in North Chelmsford, Massachusetts for asbestos analysis.

| Analyses             |           |             |
|----------------------|-----------|-------------|
| Analytical Parameter | Media     | Laboratory  |
| ( ) VOC              | ( ) AIR   | (X) NERL    |
| ( ) PCB              | ( ) WATER | ( ) CLP     |
| ( ) PESTICIDE        | ( ) SOIL  | ( ) PRIVATE |

## REMOVAL SITE INVESTIGATION

|  |  |                                |
|--|--|--------------------------------|
| <input type="checkbox"/> METALS              | <input checked="" type="checkbox"/> SOURCE | <input type="checkbox"/> DAS   |
| <input type="checkbox"/> CYANIDE             | <input type="checkbox"/> SEDIMENT          | <input type="checkbox"/> SOW   |
| <input type="checkbox"/> SVOC                | <input type="checkbox"/> SOIL GAS          | <input type="checkbox"/> FIELD |
| <input type="checkbox"/> TOXICITY            |  |                                |
| <input type="checkbox"/> DIOXIN              |  |                                |
| <input checked="" type="checkbox"/> ASBESTOS |  |                                |
| <input type="checkbox"/> OTHER               |  |                                |

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### Receptors

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#### Comments

☐ Drinking Water:    ☐ Private:  
   ☐ Municipal:

☐ Groundwater:

☐ Unrestricted Access:

☒ Population in Proximity:

The Site is in a mixed commercial/industrial and residential area near downtown Clinton.

☒ Sensitive Ecosystem:

The Site is near a series of ponds just southwest of the piles.

☐ Other:

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### Additional Procedures for Site Determination

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☐ Biological Evaluation

☐ ATSDR

☒ None

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### Site Determination

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Depending on further information, criteria that may be met by the site include 40 CFR 300.415 [b] [2], parts:

- i. Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants or contaminants.
- ii. Actual or potential contamination of drinking water supplies or sensitive ecosystems.
- iii. Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.
- iv. High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate.
- v. Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.
- vi. Threat of fire or explosion.

## REMOVAL SITE INVESTIGATION

- vii. The availability of other appropriate federal or state response mechanisms to respond to the release.
- viii. Other situations or factors that may pose threats to public health or welfare or the environment.

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### Report Generation

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|                       |                                |                         |                |
|-----------------------|--------------------------------|-------------------------|----------------|
| <b>Originator:</b>    | Marina Kovalcin                | <b>Date:</b>            | 30 April 2024  |
| <b>Affiliation:</b>   | Weston Solutions, Inc. (START) | <b>Telephone:</b>       | (978) 621-1208 |
| <b>Contract No.</b>   | 68HE0120D0001                  | <b>Contract Name:</b>   | START V        |
| <b>Task Order No.</b> | 68HE0120F0027                  | <b>Task Order Name:</b> | FP-CRT         |
| <b>AD No.:</b>        | TOFP-01-23-10-0001             | <b>Task No.:</b>        | 0200           |

## II. Narrative Chronology

## **Narrative Chronology**

### **Site History**

The Former Rockbestos Site (the Site) is located at 172 Sterling Street, Clinton, Worcester County, Massachusetts (see Appendix A, Figure 1) [1]. The site is an approximately 8.4-acre property located in a mixed commercial/industrial and residential area near downtown Clinton. The Site consists of a vacant lot that is generally flat and contains the remnant foundations from previously demolished industrial buildings. There are some portions with tile flooring remaining/exposed. The Site is bordered to the north by Sterling Street and commercial properties, to the east by Greely Street and commercial properties, to the south by wooded areas and Rigbey Street, and to the west by wooded areas and commercial properties (see Appendix A, Figure 2) [2].

Based upon available information, the Site was historically occupied by manufacturers of wire and cable since 1936. Prior to 1936, the property was used to manufacture textile. Rockbestos-Surprenant Cable Corporation operated the mill at the property until 2003/2004, when it moved operations to Connecticut. The property has been abandoned since that time. In October 2006, the property was sold to Business Reform Foundation (later referred to as SeedAmerica Foundation). SeedAmerica Foundation never operated a business at the Site but contracted with RSG Contracting Corporation (RSG) to demolish the Site structures under a MassDEP permit in 2008. The contractor conducted an asbestos survey, and roofing of the structures was managed by the demolition contractor as asbestos-containing material (ACM) and transported and disposed of off site. SeedAmerica Foundation then became insolvent and did not pay taxes to the Town of Clinton (the Town). In 2010, 172 Sterling Street, LLC, holder of a mortgage on the property, foreclosed on SeedAmerica. Snow Farm, LLC acquired the property on 15 April 2011 and transferred the property to Yu Hongli on 22 November 2011 [3].

After taking the property in 2018, and gaining access to the property, the Town of Clinton contracted an environmental firm to conduct an American Society for Testing and Materials (ASTM) Phase I/Phase II at the property. According to the Town and available sections of the report, ACM was not confirmed at the Site. In 2022, another asbestos survey was done where ACM was confirmed in one of six piles of debris that had previously been left on site, likely from the demolition of abandoned mill buildings at 172 Sterling Street [4].

More ACM material has been illegally dumped onto the Site since the Town took over the property, which has led the Town to install a fence around the pile to prevent further unauthorized access, exposure, and dumping.

In 2022, an asbestos survey conducted by a Town of Clinton environmental firm identified ACM in one of seven piles of debris on site (identified as “Pile 6”) at concentrations of asbestos up to 23%. The six non-ACM piles were moved off site to the Town’s landfill [4].

A site inspection with the Town of Clinton and Massachusetts Department of Environmental Protection (MassDEP) identified a smaller, approximately 10-cubic-yard pile of ACM that had been dumped, by an unknown party, onto the back side of Pile 6 and some ACM-containing debris outside of Pile 7’s former location. Pile 6 is believed to be the remains of demolished buildings from the abandoned mill complex at 182 Sterling Street; the pile has been present for many years

with medium-sized trees growing out of it. The remaining building slab and foundation at the Site may also have asbestos floor tiles remaining affixed to it in poor repair and open to the elements [5].

MassDEP is currently working with an asbestos contractor and the Town of Clinton to prepare a non-traditional work plan (NTWP) to remove and dispose of the smaller pile with the high concentrations of ACM. The small trees in Pile 6 were removed, and the pile was covered with plastic sheeting until it could be sampled by the EPA and transported off site. The illegally dumped small pile was also removed before the Site walk and sampling [5].

In the 2023-2024 winter season, the Site was used by the Town of Clinton to store excess snow from plowing activities during the winter months. The plowing activities pushed any remaining building materials into large mounds of snow, making them inaccessible until the snow melted. Once melted, the remaining debris was visible around the Site.

### **Sampling Activities**

On 31 January 2024, START members Marina Kovalcin, Amy Klinger, and Christine Dupree mobilized to the Site. Upon arrival, START personnel met with EPA On-Scene Coordinators (OSCs) Sherry Banks, Abdine Ouedraogo, Emma Dixon, Tyler Evans, Carlyn McGowan, and Matthew Bosselait; MassDEP representative Mark Matys; and Town of Clinton Town Administrator, Michael Ward. All personnel discussed the sampling scenario for the Site, which consisted of debris sampling for asbestos analysis. START personnel noted that Pile 6 was covered and secured by tires, as well as surrounded by a fence. The building material not in the pile had been pushed into snow piles at the perimeter of the Site, as the Site was currently being utilized by the town for snow clearing overflow storage; therefore, the building material debris was inaccessible. In addition, different types of flooring were present on the Site as well, which the OSC identified as an area they would like sampled in addition to the pile.

START personnel conducted the tailgate safety meeting and discussed the slip, trip, and fall hazards, ACM, and debris/rubble sampling protocols. START personnel reviewed the Site Health and Safety Plan (HASP). The site HASP has been prepared as a separate document, entitled *Removal Program Site Health And Safety Plan for the Former Rockbestos Preliminary Assessment/Site Investigation, Clinton, MA*.

Following the completion of the safety briefing, START member Marina Kovalcin prepared the Ludlum Model 19A gamma radiation meter and the RAE Systems, Inc. MultiRAE multigas meter with oxygen (O<sub>2</sub>), carbon monoxide (CO), hydrogen sulfide (H<sub>2</sub>S), lower explosive limit (LEL), and volatile organic compound (VOC) sensors [6,7]. Readings on the two instruments were as follows: Ludlum Model 19A: 10-15 microRoentgens per hour (μR/hr); and MultiRAE: O<sub>2</sub> = 20.8%, CO = 0 parts per million (ppm), H<sub>2</sub>S = 0 ppm, LEL = 0%, and VOC = 0 ppm.

START personnel prepared sampling equipment. EPA OSC Banks reviewed and signed the Sampling and Analysis Plan (SAP), entitled *Sampling and Analysis Plan for the Former Rockbestos Site, Clinton, Worcester County, Massachusetts* [8]. Sampling activities were performed in accordance with the Site SAP. START personnel collected a total of 15 bulk ACM samples including one duplicate. Four of the samples were collected from flooring material from



the southern portion of the site and 11 were collected from Pile 6 (see Appendix A, Figure 3 and Appendix B, Table 1) [9, 10].

START personnel photo-documented the Site, the sampled flooring material, and Pile 6 (see Appendix C, Photo-documentation Log). START member Kovalcin collected Global Positioning System (GPS) spatial location information for each sample [11].

START personnel conducted sample management activities. START member Kovalcin completed the Scribe database of the samples that was used to generate the chain-of-custody and the labels for the sample containers.

All samples were delivered and submitted to the EPA Laboratory Services and Applied Sciences Division (LSASD)/New England Regional Laboratory (NERL) for asbestos analysis.

Based on analytical results from the January 2024 sampling, additional sampling was requested by the OSC. The second round of sampling was requested due to sample locations that were inaccessible by snow cover during winter.

On 24 April 2024, START members Bonnie Mace, Tara LePage, and Christine Dupree mobilized to the Site. Upon arrival, START personnel met with EPA On-Scene Coordinator (OSC) Sherry Banks, MassDEP representative Mark Matys, Town of Clinton Administrator Michael Ward, and Town of Clinton Community and Economic Development Director Phil Duffy.

START personnel conducted the tailgate safety meeting and discussed the slip, trip, and fall hazards, ACM, and debris/waste pile sampling protocols.

Following the completion of the safety briefing, START member LePage prepared the RAE Systems, Inc. MultiRAE multigas meter with O<sub>2</sub>, CO, H<sub>2</sub>S, LEL, and VOC sensors [6, 7]. Readings on the instrument were as follows; and MultiRAE: O<sub>2</sub> = 20.9%, CO = 0 ppm, H<sub>2</sub>S = 0 ppm, LEL = 0%, and VOC = 0 ppm.

START personnel prepared sampling equipment. EPA OSC Banks reviewed and signed the revised SAP, entitled *Sampling and Analysis Plan for the Former Rockbestos Site, Clinton, Worcester County, Massachusetts* [8]. Sampling activities were performed in accordance with the Site SAP. START personnel collected a total of 42 bulk ACM samples (including one duplicate sample) throughout the site (see Appendix A, Figure 3, and Appendix B, Table 1) [9, 10].

START personnel photo-documented the samples and their locations (see Appendix C, Photo-documentation Log). START member LePage collected GPS spatial location information for each sample [11].

START personnel conducted sample management activities. START member Mace completed the Scribe database of the samples that was used to generate the chain-of-custody and the labels for the sample containers.

All samples were delivered and submitted to the EPA LSASD/ NERL for asbestos analysis.

### **Analytical Data Summaries**

On 20 February 2024, START received the analytical data results from LSASD for the January 2024 sampling. These data are summarized in Appendix B, Table 2, and included in Appendix D.

Analytical results of the bulk asbestos samples indicated that one sample (ACM-01) contained trace chrysotile asbestos, and none of the remaining samples contained asbestos above detection limits (see Appendix B, Table 2) [12].

On 23 May 2024, START received the analytical data results from LSASD for the April 2024 sampling. These data are summarized in Appendix B, Table 2, and included in Appendix D [13].

Analytical results of the bulk asbestos samples indicated that one sample (ACM-61) contained 3% chrysotile asbestos, and none of the remaining samples contained asbestos above detection limits. See Appendix A, Figure 4 and Appendix B, Table 2.

## REFERENCES

- [1] US. Geological Survey. 2021. 7.5-minute topographic map, Clinton, Massachusetts.
- [2] Esri, i-cubed, USDA FSA, USGS, AEX, GeoEye, Getmapping, Aerogrid, IGP. 2019. ArcGIS.com World Imagery Map. April.
- [3] Town of Clinton. 2021. Site Assessment Services Data Summary Report, Clinton, MA. February.
- [4] Economic EnviroTechs Incorporated. 2022. Asbestos Identification Laboratory Analytical Results, Clinton, MA. February.
- [5] MassDevelopment and the Town of Clinton. 2023. Site Readiness Assessment, Clinton, MA. May.
- [6] Weston Solutions, July 2020. Standard Operating Procedure for the PID-MultiRAE Model PGM-50; SOP No. WSI/S4-018, Superfund Technical Assessment and Response Team (START), Billerica, Massachusetts.
- [7] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Ludlum Model 19 Micro R Meter, SOP No. WSI/S5-022, Superfund Technical Assessment and Response Team (START), Billerica, Massachusetts.
- [8] Weston Solutions, Inc. 31 January 2024; revised March 2024. Sampling and Analysis Plan for the Former Rockbestos Site, Clinton, Worcester County, Massachusetts. Document Control No. R-50702.
- [9] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Waste Pile Sampling, SOP No. WSI/S5-010, Superfund Technical Assessment and Response Team (START), Billerica, Massachusetts.
- [10] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Asbestos Sampling, SOP No. WSI/S5-019, Superfund Technical Assessment and Response Team (START), Billerica, Massachusetts.
- [11] Weston Solutions, Inc. July 2020. Standard Operating Procedure for Trimble™ Global Positioning System (GPS), SOP No. WSI/S5-020, Superfund Technical Assessment and Response Team (START), Billerica, Massachusetts.
- [12] U.S. Environmental Protection Agency. 6 February 2024. Laboratory Services and Applied Sciences Division (LSASD). Laboratory Report. Project No. 23100001. Former Rockbestos Site, Clinton, Massachusetts - Bulk Asbestos Analysis by PLM.
- [13] U.S. Environmental Protection Agency. 22 May 2024. Laboratory Services and Applied Sciences Division (LSASD). Laboratory Report. Project No. 24040027. Former Rockbestos Site, Clinton, Massachusetts - Bulk Asbestos Analysis by PLM.

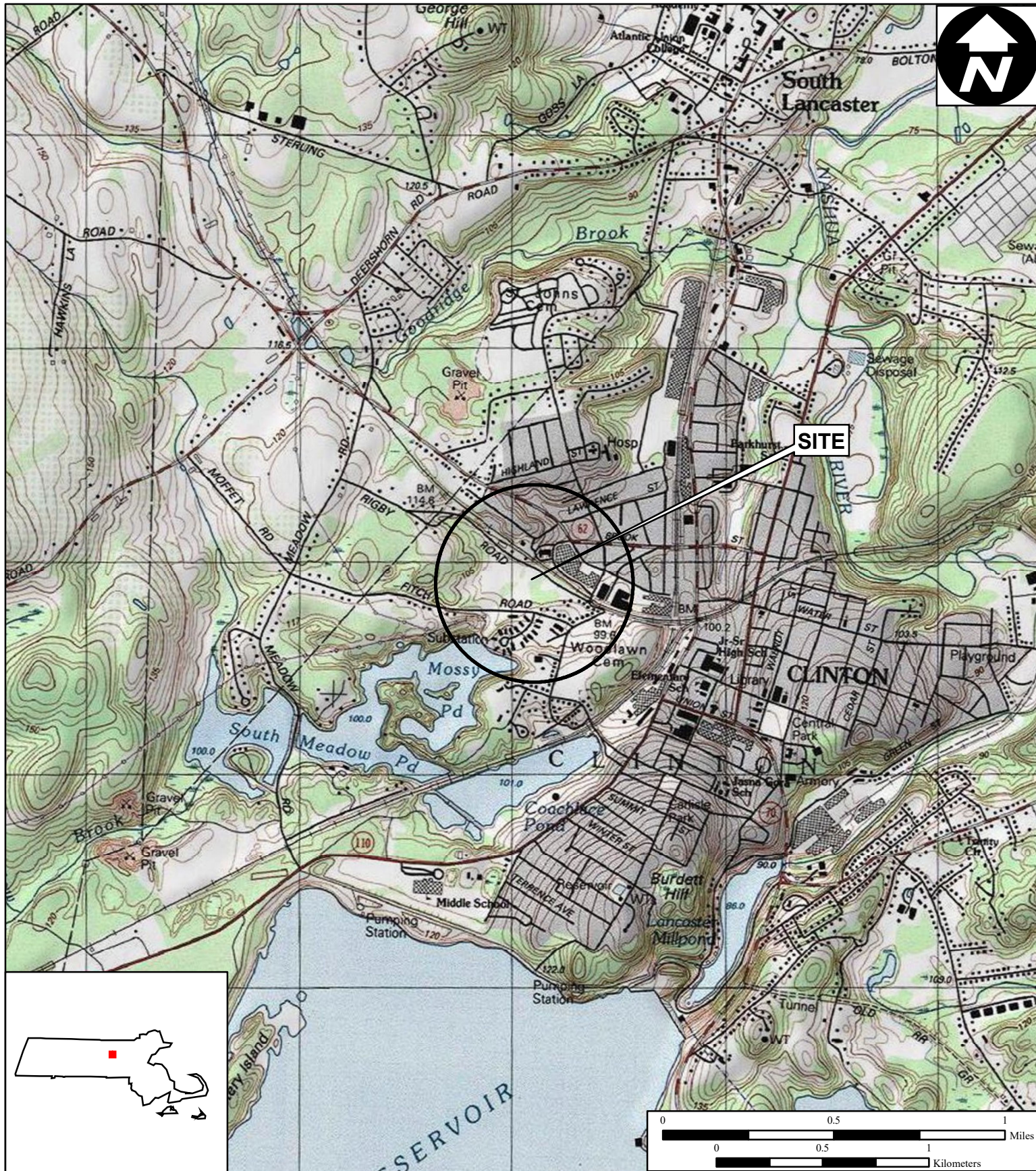
### III. Appendices

## Appendix A

### Figures

- Figure 1 - Site Location Map
- Figure 2 - Site Diagram
- Figure 3 - January 2024 Sample Location Map
- Figure 4 - April 2024 Sample Location Map





**Figure 1**

**Site Location Map**

**Former Rockbestos Site  
172 Sterling Street  
Clinton, Massachusetts**

**EPA Region I  
Superfund Technical Assessment and  
Response Team (START) V  
Contract No. 68HE0120D0001**

**AD Number:** TOFP-01-23-10-0001  
**Created by:** B. Mace  
**Created on:** 15 November 2023  
**Modified by:** B. Mace  
**Modified on:** 15 November 2023

**Data Sources:**

Topos: MicroPath/USGS/USA Topo Maps  
Quadrangle Name: Clinton, MA  
All other data: START









**Figure 2**

**Site Diagram**


**Former Rockbestos Site  
172 Sterling Street  
Clinton, Massachusetts**

**EPA Region I  
Superfund Technical Assessment and  
Response Team (START) V  
Contract No. 68HE0120D0001  
AD Number: TOFP-01-23-10-0001  
Created by: B. Mace  
Created on: 15 November 2023  
Modified by: B. Mace  
Modified on: 15 November 2023**

**LEGEND**

-  Parcel Boundary
-  Site Boundary



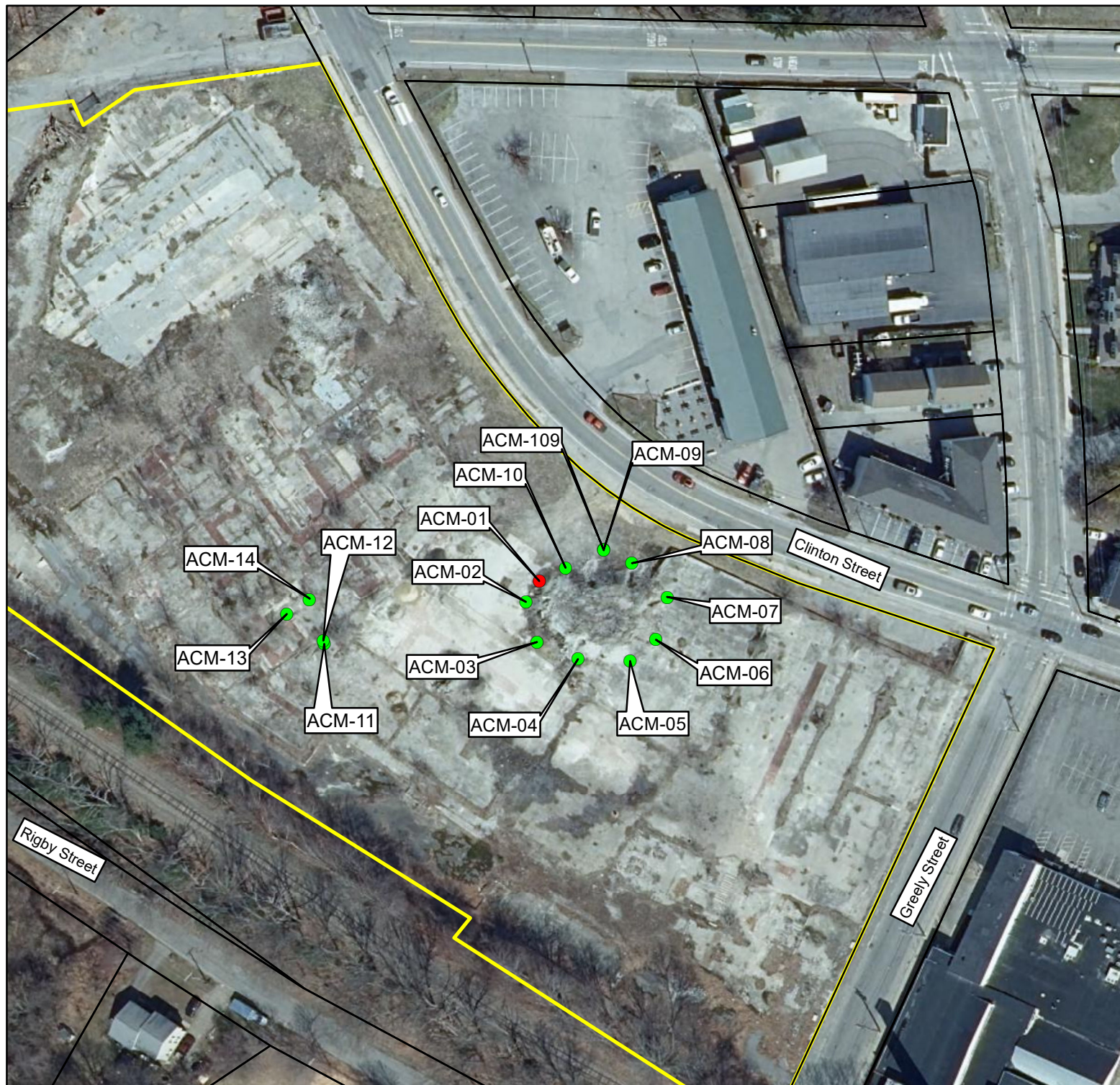
0 175 350  
  
 Feet

**Data Sources:**

Imagery: ESRI, i-cubed, USDA FSA, USGS  
 AEX, GeoEye, Getmapping, Aerogrid, IGP  
 Topos: USA TopoMaps  
 All other data: START







**Figure 3**  
**January 2024**  
**Sample Location Map**  
**Former Rockbestos Site**  
**172 Sterling Street**  
**Clinton, Massachusetts**

**EPA Region I**  
**Superfund Technical Assessment and**  
**Response Team (START) V**  
**Contract No. 68HE0120D0001**  
**AD Number:** TOFP-01-23-10-0001  
**Created by:** M. Kovalcin  
**Created on:** 12 February 2024  
**Modified by:** A. Klinger  
**Modified on:** 10 June 2024

### **LEGEND**

- Parcel Boundary
- Site Boundary
- January 2024 Sampling Locations
- January 2024 Sampling Location with ACM



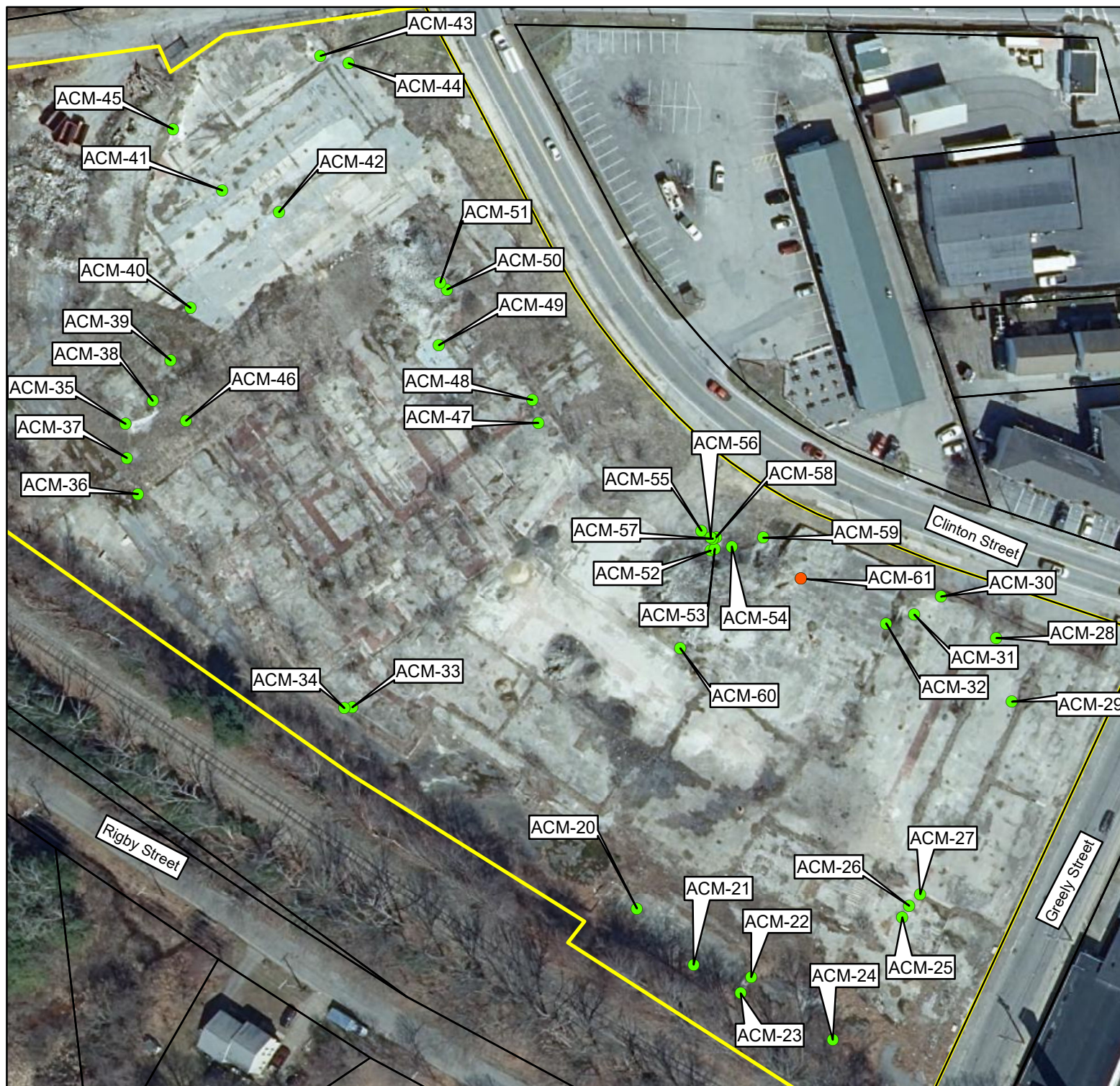
0 100 200  
 Feet

### **Data Sources:**

Imagery: ESRI, i-cubed, USDA FSA, USGS  
 AEX, GeoEye, Getmapping, Aerogrid, IGP  
 Topos: USA TopoMaps  
 All other data: START







**Figure 4**  
**April 2024**  
**Sample Location Map**  
**Former Rockbestos Site**  
**172 Sterling Street**  
**Clinton, Massachusetts**

**EPA Region I**  
**Superfund Technical Assessment and**  
**Response Team (START) V**  
**Contract No. 68HE0120D0001**  
**AD Number:** TOFP-01-23-10-0001  
**Created by:** M. Kovalcin  
**Created on:** 12 February 2024  
**Modified by:** A. Klinger  
**Modified on:** 10 June 2024

### **LEGEND**

- Parcel Boundary
- Site Boundary
- April 2024 Sampling Locations
- April 2024 Sampling Location with ACM



0 90 180  
 Feet

### **Data Sources:**

Imagery: ESRI, i-cubed, USDA FSA, USGS  
 AEX, GeoEye, Getmapping, Aerogrid, IGP  
 Topos: USA TopoMaps  
 All other data: START



## Appendix B

### Tables

- Table 1 - Bulk Asbestos Sample Descriptions
- Table 2 - Summary of Asbestos-Containing Material Sample Results

**TABLE 1**

**BULK ASBESTOS SAMPLE DESCRIPTIONS  
FORMER ROCKBESTOS SITE, CLINTON, MASSACHUSETTS  
31 JANUARY 2024 AND 24 APRIL 2024**

| Sample Number | Sample Location | Collection Date | Sample Time | Grab or Composite | Sample Type and Matrix | Sub Location             | Comments               |
|---------------|-----------------|-----------------|-------------|-------------------|------------------------|--------------------------|------------------------|
| S50200MA-0001 | ACM-01          | 1/31/2024       | 10:55       | Grab              | Bulk Debris            | Pile 6                   | Auger sediment         |
| S50200MA-0002 | ACM-02          | 1/31/2024       | 11:00       | Grab              | Bulk Debris            | Pile 6                   | Sediment               |
| S50200MA-0003 | ACM-03          | 1/31/2024       | 11:05       | Grab              | Bulk Debris            | Pile 6                   | Sediment               |
| S50200MA-0004 | ACM-04          | 1/31/2024       | 11:10       | Grab              | Bulk Debris            | Pile 6                   | Green tile             |
| S50200MA-0005 | ACM-05          | 1/31/2024       | 11:15       | Grab              | Bulk Debris            | Pile 6                   | Black material         |
| S50200MA-0006 | ACM-06          | 1/31/2024       | 11:20       | Grab              | Bulk Debris            | Pile 6                   | Red tile               |
| S50200MA-0007 | ACM-07          | 1/31/2024       | 11:25       | Grab              | Bulk Debris            | Pile 6                   | Red flooring           |
| S50200MA-0008 | ACM-08          | 1/31/2024       | 11:30       | Grab              | Bulk Debris            | Pile 6                   | Red tile               |
| S50200MA-0009 | ACM-09          | 1/31/2024       | 11:35       | Grab              | Bulk Debris            | Pile 6                   | Tile                   |
| S50200MA-0010 | ACM-10          | 1/31/2024       | 11:40       | Grab              | Bulk Debris            | Pile 6                   | Metal                  |
| S50200MA-0011 | ACM-11          | 1/31/2024       | 10:30       | Grab              | Bulk Debris            | Flooring around the site | Black flooring         |
| S50200MA-0012 | ACM-12          | 1/31/2024       | 10:35       | Grab              | Bulk Debris            | Flooring around the site | Mastic                 |
| S50200MA-0013 | ACM-13          | 1/31/2024       | 10:40       | Grab              | Bulk Debris            | Flooring around the site | Red flooring           |
| S50200MA-0014 | ACM-14          | 1/31/2024       | 10:45       | Grab              | Bulk Debris            | Flooring around the site | Small tile mastic      |
| S50200MA-0015 | ACM-109         | 1/31/2024       | 11:35       | Grab              | Bulk Debris            | Flooring around the site | Tile                   |
| S50200MA-0021 | ACM-20          | 4/24/2024       | 10:20       | Grab              | Bulk Debris            | Flooring around the site | White tile             |
| S50200MA-0022 | ACM-21          | 4/24/2024       | 10:22       | Grab              | Bulk Debris            | Flooring around the site | White tile             |
| S50200MA-0023 | ACM-22          | 4/24/2024       | 10:24       | Grab              | Bulk Debris            | Flooring around the site | Grey tile              |
| S50200MA-0024 | ACM-23          | 4/24/2024       | 10:26       | Grab              | Bulk Debris            | Flooring around the site | Beige tile             |
| S50200MA-0025 | ACM-24          | 4/24/2024       | 10:28       | Grab              | Bulk Debris            | Flooring around the site | Black rubber tile      |
| S50200MA-0026 | ACM-25          | 4/24/2024       | 10:30       | Grab              | Bulk Debris            | Flooring around the site | Fibrous white material |
| S50200MA-0027 | ACM-26          | 4/24/2024       | 10:32       | Grab              | Bulk Debris            | Flooring around the site | Red flooring           |
| S50200MA-0028 | ACM-27          | 4/24/2024       | 10:34       | Grab              | Bulk Debris            | Flooring around the site | Concrete               |
| S50200MA-0029 | ACM-28          | 4/24/2024       | 10:36       | Grab              | Bulk Debris            | Flooring around the site | Black tile             |
| S50200MA-0030 | ACM-29          | 4/24/2024       | 10:38       | Grab              | Bulk Debris            | Flooring around the site | Concrete skimcoat      |

TABLE 1

**BULK ASBESTOS SAMPLE DESCRIPTIONS  
FORMER ROCKBESTOS SITE, CLINTON, MASSACHUSETTS  
31 JANUARY 2024 AND 24 APRIL 2024**

| Sample Number | Sample Location | Collection Date | Sample Time | Grab or Composite | Sample Type and Matrix | Sub Location               | Comments  |
|---------------|-----------------|-----------------|-------------|-------------------|------------------------|----------------------------|---|
| S50200MA-0031 | ACM-30          | 4/24/2024       | 10:40       | Grab              | Bulk Debris            | Flooring around the site   | Black flooring  |
| S50200MA-0032 | ACM-31          | 4/24/2024       | 10:42       | Grab              | Bulk Debris            | Flooring around the site   | Grey flooring   |
| S50200MA-0033 | ACM-32          | 4/24/2024       | 10:44       | Grab              | Bulk Debris            | Flooring around the site   | Concrete skimcoat   |
| S50200MA-0034 | ACM-33          | 4/24/2024       | 10:46       | Grab              | Bulk Debris            | Flooring around the site   | Light grey resin, flooring material                                     |
| S50200MA-0035 | ACM-34          | 4/24/2024       | 10:48       | Grab              | Bulk Debris            | Flooring around the site   | Red fibrous sheeting  |
| S50200MA-0036 | ACM-35          | 4/24/2024       | 10:50       | Grab              | Bulk Debris            | Flooring around the site   | White fiber tile  |
| S50200MA-0037 | ACM-36          | 4/24/2024       | 10:52       | Grab              | Bulk Debris            | Flooring around the site   | White tile  |
| S50200MA-0038 | ACM-37          | 4/24/2024       | 10:54       | Grab              | Bulk Debris            | Flooring around the site   | Green tile  |
| S50200MA-0039 | ACM-38          | 4/24/2024       | 10:56       | Grab              | Bulk Debris            | Flooring around the site   | White stone tile  |
| S50200MA-0040 | ACM-39          | 4/24/2024       | 10:58       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete flooring  |
| S50200MA-0041 | ACM-40          | 4/24/2024       | 11:00       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete flooring  |
| S50200MA-0042 | ACM-41          | 4/24/2024       | 11:02       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete flooring  |
| S50200MA-0043 | ACM-42          | 4/24/2024       | 11:04       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete flooring  |
| S50200MA-0044 | ACM-43          | 4/24/2024       | 11:06       | Grab              | Bulk Debris            | Flooring around the site   | White tile  |
| S50200MA-0045 | ACM-44          | 4/24/2024       | 11:08       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete flooring  |
| S50200MA-0046 | ACM-45          | 4/24/2024       | 11:10       | Grab              | Bulk Debris            | Flooring around the site   | Grey concrete   |
| S50200MA-0047 | ACM-46          | 4/24/2024       | 11:12       | Grab              | Bulk Debris            | Flooring around the site   | Grey red flooring   |
| S50200MA-0048 | ACM-47          | 7/24/2006       | 11:14       | Grab              | Bulk Debris            | Flooring around the site   | White tile  |
| S50200MA-0049 | ACM-48          | 4/24/2024       | 11:16       | Grab              | Bulk Debris            | Flooring around the site   | White tile  |
| S50200MA-0050 | ACM-49          | 4/24/2024       | 11:18       | Grab              | Bulk Debris            | Flooring around the site   | Black tile  |
| S50200MA-0051 | ACM-50          | 4/24/2024       | 11:20       | Grab              | Bulk Debris            | Flooring around the site   | White fabric around possible light fixture                              |
| S50200MA-0052 | ACM-51          | 4/24/2024       | 11:22       | Grab              | Bulk Debris            | Flooring around the site   | White tile  |
| S50200MA-0053 | ACM-52          | 4/24/2024       | 11:24       | Grab              | Bulk Debris            | Northern opening of Pile 6 | Grey tile, located in the opening on the north side of the debris pile  |
| S50200MA-0054 | ACM-53          | 4/24/2024       | 11:26       | Grab              | Bulk Debris            | Northern opening of Pile 6 | Green tile, located in the opening on the north side of the debris pile |

**TABLE 1**

**BULK ASBESTOS SAMPLE DESCRIPTIONS  
FORMER ROCKBESTOS SITE, CLINTON, MASSACHUSETTS  
31 JANUARY 2024 AND 24 APRIL 2024**

| Sample Number | Sample Location | Collection Date | Sample Time | Grab or Composite | Sample Type and Matrix | Sub Location               | Comments   |
|---------------|-----------------|-----------------|-------------|-------------------|------------------------|----------------------------|--|
| S50200MA-0055 | ACM-54          | 4/24/2024       | 11:30       | Grab              | Bulk Debris            | Northern opening of Pile 6 | Dark grey tile, located in the opening on the north side of the debris pile                              |
| S50200MA-0056 | ACM-55          | 4/24/2024       | 11:32       | Grab              | Bulk Debris            | Ground surface near Pile 6 | Black tile, located on the ground surface near the debris pile   |
| S50200MA-0057 | ACM-56          | 4/24/2024       | 11:36       | Grab              | Bulk Debris            | Ground surface near Pile 6 | Green tile, located on the ground surface near the debris pile   |
| S50200MA-0058 | ACM-57          | 4/24/2024       | 11:38       | Grab              | Bulk Debris            | Ground surface near Pile 6 | Black tile sandwiching white tile together with adhesive, located on ground surface near the debris pile |
| S50200MA-0059 | ACM-58          | 4/24/2024       | 11:40       | Grab              | Bulk Debris            | Ground surface near Pile 6 | White tile, bottom piece of the tiles sandwiched together, located on ground surface near debris pile    |
| S50200MA-0060 | ACM-59          | 4/24/2024       | 11:42       | Grab              | Bulk Debris            | Ground surface near Pile 6 | White tile, bottom piece of the tiles sandwiched together, located on ground surface near debris pile    |
| S50200MA-0061 | ACM-60          | 4/24/2024       | 11:46       | Grab              | Bulk Debris            | Ground surface near Pile 6 | White tile, located on ground surface near debris pile   |
| S50200MA-0062 | ACM-61          | 4/24/2024       | 11:50       | Grab              | Bulk Debris            | Ground surface near Pile 6 | White tile, located on ground surface near debris pile   |



TABLE 2

**SUMMARY OF ASBESTOS-CONTAINING MATERIAL SAMPLE RESULTS  
FORMER ROCKBESTOS SITE  
CLINTON, MASSACHUSETTS  
% Volume**

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-01<br>S50200MA-0001<br>AC11235<br>1/31/2024 | ACM-02<br>S50200MA-0002<br>AC11236<br>1/31/2024 | ACM-03<br>S50200MA-0003<br>AC11237<br>1/31/2024 | ACM-04<br>S50200MA-0004<br>AC11238<br>1/31/2024 | ACM-05<br>S50200MA-0005<br>AC11239<br>1/31/2024 | ACM-06<br>S50200MA-0006<br>AC11240<br>1/31/2024 | ACM-07<br>S50200MA-0007<br>AC11241<br>1/31/2024 | ACM-08<br>S50200MA-0008<br>AC11242<br>1/31/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | Trace   | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-09<br>S50200MA-0009<br>AC11243<br>1/31/2024 | ACM-109<br>S50200MA-0015<br>AC11244<br>1/31/2024 | ACM-10<br>S50200MA-0010<br>AC11245<br>1/31/2024 | ACM-11<br>S50200MA-0011<br>AC11246<br>1/31/2024 | ACM-12<br>S50200MA-0012<br>AC11247<br>1/31/2024 | ACM-13<br>S50200MA-0013<br>AC11248<br>1/31/2024 | ACM-14<br>S50200MA-0014<br>AC11249<br>1/31/2024 |  |
|---|---|--|---|---|---|---|---|--|
| <b>COMPOUND</b>   |   |  |   |   |   |   |   |  |
| Actinolite  | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |
| Amosite   | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |
| Anthophyllite   | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |
| Chrysotile  | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |
| Crocidolite   | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |
| Tremolite   | ND  | ND   | ND  | ND  | ND  | ND  | ND  |  |

**NOTES:**

- 1) Samples were analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) New England Regional Laboratory (NERL) via Polarized Light Microscopy (PLM).
- 2) All quantities are estimated volume percent (%).
- 3) ND = Not Detected
- 4) Samples ACM-01 through ACM-14 collected January 2024; samples ACM-20 through ACM-61 collected April 2024.

TABLE 2

**SUMMARY OF ASBESTOS-CONTAINING MATERIAL SAMPLE RESULTS  
FORMER ROCKBESTOS SITE  
CLINTON, MASSACHUSETTS  
% Volume**

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-20<br>S50200MA-0021<br>AC12441<br>4/24/2024 | ACM-21<br>S50200MA-0022<br>AC12442<br>4/24/2024 | ACM-22<br>S50200MA-0023<br>AC12443<br>4/24/2024 | ACM-23<br>S50200MA-0024<br>AC12444<br>4/24/2024 | ACM-24<br>S50200MA-0025<br>AC12445<br>4/24/2024 | ACM-25<br>S50200MA-0026<br>AC12446<br>4/24/2024 | ACM-26<br>S50200MA-0027<br>AC12447<br>4/24/2024 | ACM-27<br>S50200MA-0028<br>AC12448<br>4/24/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-28<br>S50200MA-0029<br>AC12449<br>4/24/2024 | ACM-29<br>S50200MA-0030<br>AC12450<br>4/24/2024 | ACM-30<br>S50200MA-0031<br>AC12451<br>4/24/2024 | ACM-31<br>S50200MA-0032<br>AC12452<br>4/24/2024 | ACM-32<br>S50200MA-0033<br>AC12453<br>4/24/2024 | ACM-33<br>S50200MA-0034<br>AC12454<br>4/24/2024 | ACM-34<br>S50200MA-0035<br>AC12455<br>4/24/2024 | ACM-35<br>S50200MA-0036<br>AC12456<br>4/24/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-36<br>S50200MA-0037<br>AC12457<br>4/24/2024 | ACM-37<br>S50200MA-0038<br>AC12458<br>4/24/2024 | ACM-38<br>S50200MA-0039<br>AC12459<br>4/24/2024 | ACM-39<br>S50200MA-0040<br>AC12460<br>4/24/2024 | ACM-40<br>S50200MA-0041<br>AC12461<br>4/24/2024 | ACM-41<br>S50200MA-0042<br>AC12462<br>4/24/2024 | ACM-42<br>S50200MA-0043<br>AC12463<br>4/24/2024 | ACM-43<br>S50200MA-0044<br>AC12464<br>4/24/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

**NOTES:**

- 1) Samples were analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) New England Regional Laboratory (NERL) via Polarized Light Microscopy (PLM).
- 2) All quantities are estimated volume percent (%).
- 3) ND = Not Detected
- 4) Samples ACM-01 through ACM-14 collected January 2024; samples ACM-20 through ACM-61 collected April 2024.

TABLE 2

**SUMMARY OF ASBESTOS-CONTAINING MATERIAL SAMPLE RESULTS  
FORMER ROCKBESTOS SITE  
CLINTON, MASSACHUSETTS  
% Volume**

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-44<br>S50200MA-0045<br>AC12465<br>4/24/2024 | ACM-45<br>S50200MA-0046<br>AC12466<br>4/24/2024 | ACM-46<br>S50200MA-0047<br>AC12467<br>4/24/2024 | ACM-47<br>S50200MA-0048<br>AC12468<br>4/24/2024 | ACM-48<br>S50200MA-0049<br>AC12469<br>4/24/2024 | ACM-49<br>S50200MA-0050<br>AC12470<br>4/24/2024 | ACM-50<br>S50200MA-0051<br>AC12471<br>4/24/2024 | ACM-51<br>S50200MA-0052<br>AC12472<br>4/24/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-52<br>S50200MA-0053<br>AC12473<br>4/24/2024 | ACM-53<br>S50200MA-0054<br>AC12474<br>4/24/2024 | ACM-54<br>S50200MA-0055<br>AC12475<br>4/24/2024 | ACM-55<br>S50200MA-0056<br>AC12476<br>4/24/2024 | ACM-56<br>S50200MA-0057<br>AC12477<br>4/24/2024 | ACM-57<br>S50200MA-0058<br>AC12478<br>4/24/2024 | ACM-58<br>S50200MA-0059<br>AC12479<br>4/24/2024 | ACM-59<br>S50200MA-0060<br>AC12480<br>4/24/2024 |
|---|---|---|---|---|---|---|---|---|
| <b>COMPOUND</b>   |   |   |   |   |   |   |   |   |
| Actinolite  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Amosite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Anthophyllite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Chrysotile  | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Crocidolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |
| Tremolite   | ND  | ND  | ND  | ND  | ND  | ND  | ND  | ND  |

| SAMPLE LOCATION<br>SAMPLE NUMBER<br>LABORATORY NUMBER<br>DATE SAMPLED | ACM-60<br>S50200MA-0061<br>AC12480<br>4/24/2024 | ACM-61<br>S50200MA-0062<br>AC12481<br>4/24/2024 |
|---|---|---|
| <b>COMPOUND</b>   |   |   |
| Actinolite  | ND  | ND  |
| Amosite   | ND  | ND  |
| Anthophyllite   | ND  | ND  |
| Chrysotile  | ND  | 3   |
| Crocidolite   | ND  | ND  |
| Tremolite   | ND  | ND  |

**NOTES:**

- 1) Samples were analyzed by U.S. EPA Office of Environmental Measurement and Evaluation (OEME) New England Regional Laboratory (NERL) via Polarized Light Microscopy (PLM).
- 2) All quantities are estimated volume percent (%).
- 3) ND = Not Detected
- 4) Samples ACM-01 through ACM-14 collected January 2024; samples ACM-20 through ACM-61 collected April 2024.



## Appendix C

### Photo-documentation Log

**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the consolidated debris pile, “Pile 6”, as seen from the center of the Site. Pile 6 is fenced and covered with reinforced poly sheeting. Photograph taken facing east.

**DATE:** 31 January 2024

**PHOTOGRAPHER:** A. Klinger

**TIME:** 0910 hours

**CAMERA:** Apple iPhone 13



**SCENE:** View of sampling area with samples ACM-11 through ACM-14. Several types of flooring were observed in this location to the west of Pile 6. Photograph taken facing west.

**DATE:** 31 January 2024

**PHOTOGRAPHER:** A. Klinger

**TIME:** 0909 hours

**CAMERA:** Apple iPhone 13

**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the potentially asbestos-containing material (ACM) collected as samples ACM-11 and ACM-12, with snow/debris pile to the right and Pile 6 to the left in the background. The photograph primarily indicates black flooring material collected as ACM-11. Gray mastic material was also collected. Photograph taken facing southwest.

**DATE:** 31 January 2024

**TIME:** 0932 hours

**PHOTOGRAPHER:** A. Klinger

**CAMERA:** Apple iPhone 13



**SCENE:** View of a pile of mixed snow and debris, containing potential ACM building materials, at the southern corner of the Site. Photograph taken facing southwest.

**DATE:** 31 January 2024

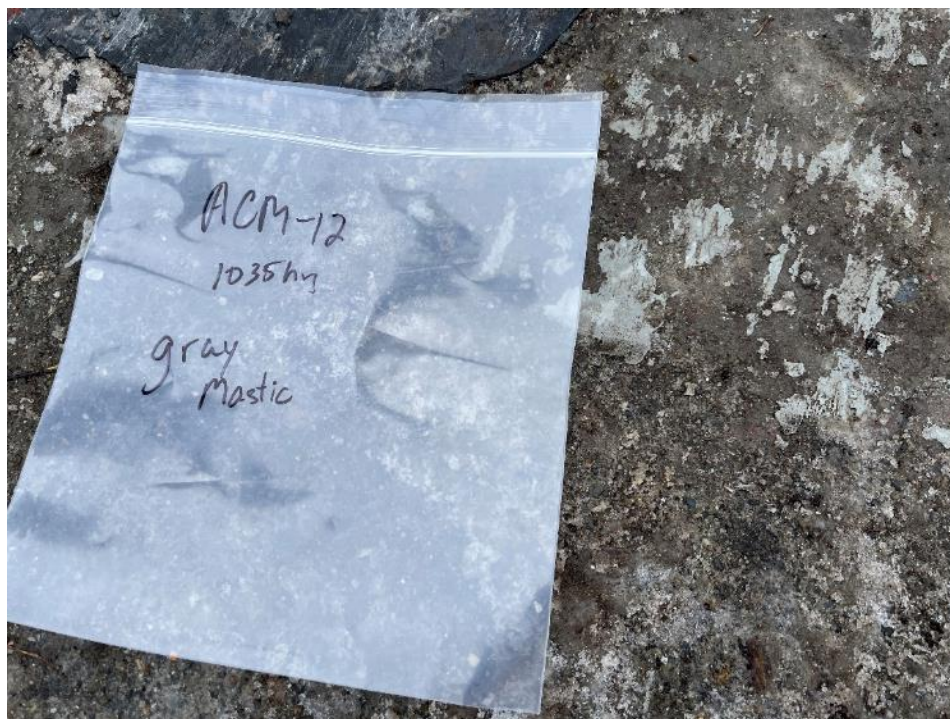
**TIME:** 0911 hours

**PHOTOGRAPHER:** A. Klinger

**CAMERA:** Apple iPhone 13



**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the gray mastic material collected as sample ACM-12 and black flooring, collected as sample ACM-11.

**DATE:** 31 January 2024

**PHOTOGRAPHER:** M. Kovalcin

**TIME:** 1041 hours

**CAMERA:** Apple iPhone 13



**SCENE:** View of the red flooring material collected as sample ACM-13.

**DATE:** 31 January 2024

**PHOTOGRAPHER:** M. Kovalcin

**TIME:** 1041 hours

**CAMERA:** Apple iPhone 13



**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the black and white tiles collected as sample ACM-14.

**DATE:** 31 January 2024

**PHOTOGRAPHER:** M. Kovalcin

**TIME:** 1043 hours

**CAMERA:** Apple iPhone 13



**SCENE:** View of the beige tile collected as sample ACM-23, during the second sampling event.

**DATE:** 24 April 2024

**PHOTOGRAPHER:** C. Dupree

**TIME:** 1033 hours

**CAMERA:** Apple iPhone 13



**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the light gray resin flooring material collected as sample ACM-33.

**DATE:** 24 April 2024

**TIME:** 1053 hours

**PHOTOGRAPHER:** C. Dupree

**CAMERA:** Apple iPhone 13



**SCENE:** View of the white tile collected as sample ACM-43.

**DATE:** 24 April 2024

**TIME:** 1108 hours

**PHOTOGRAPHER:** C. Dupree

**CAMERA:** Apple iPhone 13



**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of the white tile collected as sample ACM-48.

**DATE:** 24 April 2024

**PHOTOGRAPHER:** C. Dupree

**TIME:** 1134 hours

**CAMERA:** Apple iPhone 13



**SCENE:** View of the sampling area on the eastern side of the Site. Photograph taken facing south.

**DATE:** 24 April 2024

**PHOTOGRAPHER:** C. Dupree

**TIME:** 1306 hours

**CAMERA:** Apple iPhone 13



**PHOTODOCUMENTATION LOG**  
**Former Rockbestos Site • Clinton, Massachusetts**



**SCENE:** View of black and white tiles sandwiched together, collected as samples ACM-57, ACM-58, and ACM-59.

**DATE:** 24 April 2024

**TIME:** 1310 hours

**PHOTOGRAPHER:** C. Dupree

**CAMERA:** Apple iPhone 13



**SCENE:** View of Pile 6 on site with sample location ACM-58 indicated by the flag. Photograph taken facing northwest.

**DATE:** 24 April 2024

**TIME:** 1312 hours

**PHOTOGRAPHER:** C. Dupree

**CAMERA:** Apple iPhone 13



## Appendix D

### Analytical Data and Chain-of-Custody Records

## Laboratory Report

February 06, 2024

Abdine Ouedraogo

Project Number: 24020001

Project: Former Rockbestos Site - Clinton, MA

Analysis: Bulk Asbestos Analysis by PLM

Analyst: Scott Clifford

### Analytical Procedure:

All samples were received and logged in by the laboratory according to the USEPA New England SOP for Sample Log-in.

Sample preparation and analysis was done following the EPA Region I SOP, INGASBSED2.

Analytical Method: Polarized Light Microscope (PLM) with Dispersion Staining.

All quantities are estimated volume percent.

Date Samples Received by the Laboratory: 02/01/2024

Data were reviewed in accordance with the internal verification procedures described in the EPA New England OEME Chemistry QA Plan.

Results relate only to the items tested or to the samples as received by the Laboratory. This analytical report shall not be reproduced except in full, without written approval of the laboratory.

Report may contain multiple sections and each section will be numbered independently.

If you have any questions please call me at 617-918-8340 .

Sincerely,

**DANIEL**

**BOUDREAU**

Digitally signed by  
DANIEL BOUDREAU

Date: 2024.02.06  
14:37:19 -05'00'

24020001\$ASBES

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0001  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11235  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | Trace                      | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: Trace Chrysotile present, much less than 1%.

One small fiber bundle.

Client Sample ID: S50200MA-0002  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11236  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0003  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11237  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0004  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11238  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0005  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11239  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0006  
Date of Collection: 1/31/2024  
Date of Extraction: 2/5/24  
Date of Analysis: 2/5/24

Lab Sample ID: AC11240  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0007  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11241  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0008  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11242  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0009  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11243  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0010  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11244  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0011  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11245  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0012  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11246  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:



**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0013  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11247  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

Client Sample ID: S50200MA-0014  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11248  
Matrix: Soil/Debris

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments:

**Former Rockbestos Site - Clinton, MA**

**Bulk Asbestos Analysis by PLM**

Client Sample ID: S50200MA-0015  
Date of Collection: 1/31/2024  
Date of Extraction: 2/6/24  
Date of Analysis: 2/6/24

Lab Sample ID: AC11249  
Matrix: Soil/Debris

| <u>CAS Number</u> | <u>Compound</u> | <u>Concentration</u><br><u>%</u> | <u>RL</u><br><u>%</u> | <u>Qualifier</u> |
|-------------------|-----------------|----------------------------------|-----------------------|------------------|
|                   | Actinolite      | ND                               | 1.0                   |                  |
|                   | Amosite         | ND                               | 1.0                   |                  |
|                   | Anthophyllite   | ND                               | 1.0                   |                  |
|                   | Chrysotile      | ND                               | 1.0                   |                  |
|                   | Crocidolite     | ND                               | 1.0                   |                  |
|                   | Tremolite       | ND                               | 1.0                   |                  |

Comments:

PN: 24020001

## USEPA

DateShipped: 2/1/2024

CarrierName: Handheld

AirbillNo:

## CHAIN OF CUSTODY RECORD

Former Rockbestos Site/MA

Contact Name: Sherry Banks

Contact Phone: 6176805547

No: MA23100001-001

Cooler #:

Lab: NERL

Lab Phone:

| Lab # | Sample #      | Location | Sub Location | Analyses | Matrix      | Sample Date | Sample Time | Numb Cont | Container | Preservative | Lab QC |
|-------|---------------|----------|--------------|----------|-------------|-------------|-------------|-----------|-----------|--------------|--------|
|       | S50200MA-0001 | ACM-01   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 10:55       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0002 | ACM-02   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:00       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0003 | ACM-03   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:05       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0004 | ACM-04   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:10       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0005 | ACM-05   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:15       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0006 | ACM-06   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:20       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0007 | ACM-07   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:25       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0008 | ACM-08   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:30       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0009 | ACM-09   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:35       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0010 | ACM-10   | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:40       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0011 | ACM-11   | Flooring     | Asbestos | Soil/Debris | 1/31/2024   | 10:30       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0012 | ACM-12   | Flooring     | Asbestos | Soil/Debris | 1/31/2024   | 10:35       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0013 | ACM-13   | Flooring     | Asbestos | Soil/Debris | 1/31/2024   | 10:40       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0014 | ACM-14   | Flooring     | Asbestos | Soil/Debris | 1/31/2024   | 10:45       | 1         | Poly Bag  | 4 C          | N      |
|       | S50200MA-0015 | ACM-109  | Pile 6       | Asbestos | Soil/Debris | 1/31/2024   | 11:35       | 1         | Poly Bag  | 4 C          | N      |
|       |               |          |              |          |             |             |             |           |           |              |        |
|       |               |          |              |          |             |             |             |           |           |              |        |
|       |               |          |              |          |             |             |             |           |           |              |        |
|       |               |          |              |          |             |             |             |           |           |              |        |

Special Instructions: Please send results to OSC Sherry Banks and OSC Abdine Ouedraogo.

SAMPLES TRANSFERRED FROM

CHAIN OF CUSTODY #

| Items/Reason | Relinquished by (Signature and Organization) | Date/Time         | Received by (Signature and Organization) | Date/Time       | Sample Condition Upon Receipt |
|--------------|--|-------------------|--|-----------------|-------------------------------|
|              | N. Z. / Weston                               | 2/1/2024<br>10:00 | Laura Howard (ESAT)                      | 2/1/24<br>10:00 |                               |
|              |  |                   |  |                 |                               |
|              |  |                   |  |                 |                               |
|              |  |                   |  |                 |                               |

**US EPA REGION 1  
SAMPLE RECEIPT CHECKLIST**

|  |  |
|--|--|
| <b>PROJ #:</b> 24020001  | <b>RECEIPT DATE:</b> 02/01/24  |
| <b>SURVEY NAME:</b> Former Rockbestos Site<br><b>LOCATION:</b> Clinton, MA | <b>REC'D BY:</b> Laura Glowacki (ESAT)                                       |
| <b>OSC/PO:</b> Abdlne Onedrago, Sherry Banks                               | <b>SITE ID:</b> 01TC <b>SUPERFUND:</b> Y <input checked="" type="checkbox"/> |

|   |  |
|---|--|
| <p><b>WERE SAMPLES SHIPPED?</b> _____</p> <p><b>TRACKING #:</b> _____<br/><b>DATE/SENT:</b> _____</p> <p><b>NO.</b> <input checked="" type="checkbox"/> <b>Hand Delivered</b> <input checked="" type="checkbox"/></p> <p><b>COOLER TEMPERATURE UPON ARRIVAL</b> <sup>NA</sup> _____ <sup>°C / NA</sup> _____</p> <p><b>CHAIN OF CUSTODY PRESENT?</b> Y <input checked="" type="checkbox"/><br/> <b>COMPLETE?</b> Y <input checked="" type="checkbox"/></p> <p><b>CUSTODY SEALS PRESENT ON COOLER?</b> N <input checked="" type="checkbox"/><br/> <b>SAMPLES?</b> N <input checked="" type="checkbox"/></p> <p><b>WERE SAMPLE CONTAINERS INTACT?</b> Y <input checked="" type="checkbox"/></p> <p><b>WAS SAMPLE PRESERVATION DOCUMENTED?</b><br/> <b>COC</b> ✓ <b>Sample Container</b></p> <p><b>APPROPRIATE SAMPLES VOLUME</b> Y <input checked="" type="checkbox"/><br/> <b>FOR REQUESTED ANALYSIS?</b></p> <p><b>SAMPLES AND COC MATCH?</b> Y <input checked="" type="checkbox"/></p> <p><b>IF ANY PROBLEMS WAS PROJECT MANAGER NOTIFIED?</b><br/> <b>BY WHOM?</b> <sup>NA</sup> _____</p> <p><b>APPROPRIATE SAMPLE CONTAINERS?</b> Y <input checked="" type="checkbox"/><br/> <b>SAMPLES WITHIN HOLDING TIMES?</b> Y <input checked="" type="checkbox"/><br/> <b>ALL ANALYSIS SPECIFIED ON COC?</b> Y <input checked="" type="checkbox"/><br/> <b>DATE/TIME OF COLLECTION ON COC</b> Y <input checked="" type="checkbox"/><br/> <b>TURN-AROUND TIME:</b> 4 weeks</p> | <p><b>COMMENTS:</b> Soil/Debris samples<br/>15 \$ASBES</p> |
|---|--|



## Laboratory Report

May 22, 2024

Abdine Ouedraogo  
US EPA New England

Project Number: 24040027  
Project: Former Rockbestos Site - Clinton, MA  
Analysis: Bulk Asbestos Analysis by PLM  
Analyst: Dan Boudreau

### Analytical Procedure:

All samples were received and logged in by the laboratory according to the USEPA New England SOP for Sample Log-in.

Sample preparation and analysis was done following the EPA Region I SOP, INGASBSED2.

Analytical Method: Polarized Light Microscope (PLM) with Dispersion Staining.  
All quantities are estimated volume percent.

Date Samples Received by the Laboratory: 04/25/2024

Data were reviewed in accordance with the internal verification procedures described in the EPA New England OEME Chemistry QA Plan.

Results relate only to the items tested or to the samples as received by the Laboratory. This analytical report shall not be reproduced except in full, without written approval of the laboratory.

Report may contain multiple sections and each section will be numbered independently.

If you have any questions please call me at 617-918-8340 .

Sincerely,

24040027\$ASBES

The asbestos content of floor tiles varies greatly. Studies of 200 tiles done by Hector S. MacDonald and John Bedore of the Brookfield Academy never found a tile with greater than 28% asbestos. Peter Cooke of the McCrone Research Institute states that the asbestos content of floor tiles was typically 12%. Components of the floor tiles make analysis by PLM with dispersion staining difficult. Plasma ashing and solvent extraction are techniques employed to remove this interference. Asbestos levels of ~1% are likely to be from mineral contamination. Using this method it is difficult to determine low levels of asbestos and negative results should be considered inconclusive.



Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0021  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12441  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0022  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12442  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

**Former Rockbestos Site - Clinton, MA**

**Laboratory Blank for Bulk Asbestos**

|                     |          |                |        |
|---------------------|----------|----------------|--------|
| Client Sample ID:   | N/A      | Lab Sample ID: | N/A    |
| Date of Collection: | N/A      | Matrix         | Debris |
| Date of Extraction: | 5/20/24  |                | NA mL  |
| Date of Analysis:   | 5/20/24  |                |        |
|                     | NA grams |                |        |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: RTI #16 used to check PLM alignment

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|                     |               |                |         |
|---------------------|---------------|----------------|---------|
| Client Sample ID:   | S50200MA-0023 | Lab Sample ID: | AC12443 |
| Date of Collection: | 4/24/2024     | Matrix         | Debris  |
| Date of Extraction: | 5/20/24       |                | NA mL   |
| Date of Analysis:   | 5/20/24       |                |         |
|                     | NA grams      |                |         |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0024  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12444  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0025  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12445  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0026  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12446  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass and cellulose fibers.

Client Sample ID: S50200MA-0027  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12447  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0028  
Date of Collection: 4/24/2024  
Date of Extraction: 5/20/24  
Date of Analysis: 5/20/24  
NA grams

Lab Sample ID: AC12448  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0029  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12449  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

**Former Rockbestos Site - Clinton, MA**

**Laboratory Blank for Bulk Asbestos**

|                     |          |                |        |
|---------------------|----------|----------------|--------|
| Client Sample ID:   | N/A      | Lab Sample ID: | N/A    |
| Date of Collection: | N/A      | Matrix         | Debris |
| Date of Extraction: | 5/21/24  |                | NA mL  |
| Date of Analysis:   | 5/21/24  |                |        |
|                     | NA grams |                |        |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: RTI #166 used to verify PLM alignment

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|                     |               |                |         |
|---------------------|---------------|----------------|---------|
| Client Sample ID:   | S50200MA-0030 | Lab Sample ID: | AC12450 |
| Date of Collection: | 4/24/2024     | Matrix         | Debris  |
| Date of Extraction: | 5/21/24       |                | NA mL   |
| Date of Analysis:   | 5/21/24       |                |         |
|                     | NA grams      |                |         |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0031  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12451  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass and cellulose fibers

Client Sample ID: S50200MA-0032  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12452  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.



Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0033  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12453  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Cellulose fibers

Client Sample ID: S50200MA-0034  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12454  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0035  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12455  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass fibers

Client Sample ID: S50200MA-0036  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12456  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass fibers

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0037  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12457  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass fibers

Client Sample ID: S50200MA-0038  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12458  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0039  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12459  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0040  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12460  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0041  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12461  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0042  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12462  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.



Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0043  
Date of Collection: 4/24/2024  
Date of Extraction: 5/21/24  
Date of Analysis: 5/21/24  
NA grams

Lab Sample ID: AC12463  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0044  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12464  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

**Former Rockbestos Site - Clinton, MA**

**Laboratory Blank for Bulk Asbestos**

|                     |          |                |        |
|---------------------|----------|----------------|--------|
| Client Sample ID:   | N/A      | Lab Sample ID: | N/A    |
| Date of Collection: | N/A      | Matrix         | Debris |
| Date of Extraction: | 5/22/24  |                | NA mL  |
| Date of Analysis:   | 5/22/24  |                |        |
|                     | NA grams |                |        |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: RTI #16 to verify alignment of PLM

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|                     |               |                |         |
|---------------------|---------------|----------------|---------|
| Client Sample ID:   | S50200MA-0045 | Lab Sample ID: | AC12465 |
| Date of Collection: | 4/24/2024     | Matrix         | Debris  |
| Date of Extraction: | 5/22/24       |                | NA mL   |
| Date of Analysis:   | 5/22/24       |                |         |
|                     | NA grams      |                |         |

| <b>CAS Number</b> | <b>Compound</b> | <b>Concentration<br/>%</b> | <b>RL<br/>%</b> | <b>Qualifier</b> |
|-------------------|-----------------|----------------------------|-----------------|------------------|
|                   | Actinolite      | ND                         | 1.0             |                  |
|                   | Amosite         | ND                         | 1.0             |                  |
|                   | Anthophyllite   | ND                         | 1.0             |                  |
|                   | Chrysotile      | ND                         | 1.0             |                  |
|                   | Crocidolite     | ND                         | 1.0             |                  |
|                   | Tremolite       | ND                         | 1.0             |                  |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0046  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12466  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0047  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12467  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0048  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12468  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0049  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12469  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0050  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12470  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0051  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12471  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: Fiberglass fibers



Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0052  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12472  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0053  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12473  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0054  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12474  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0055  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12475  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0056  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12476  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0057  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12477  
Matrix Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0058  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12478  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0059  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12479  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0060  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12480  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.

Client Sample ID: S50200MA-0061  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12481  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | 3                  | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments:

Former Rockbestos Site - Clinton, MA

Bulk Asbestos Analysis by PLM

Client Sample ID: S50200MA-0062  
Date of Collection: 4/24/2024  
Date of Extraction: 5/22/24  
Date of Analysis: 5/22/24  
NA grams

Lab Sample ID: AC12482  
Matrix: Debris  
NA mL

| CAS Number | Compound      | Concentration<br>% | RL<br>% | Qualifier |
|------------|---------------|--------------------|---------|-----------|
|            | Actinolite    | ND                 | 1.0     |           |
|            | Amosite       | ND                 | 1.0     |           |
|            | Anthophyllite | ND                 | 1.0     |           |
|            | Chrysotile    | ND                 | 1.0     |           |
|            | Crocidolite   | ND                 | 1.0     |           |
|            | Tremolite     | ND                 | 1.0     |           |

Comments: No visible fibers.



PW 24040027

Page 1 of 3

USEPA  
START  
Weston Solutions, Inc.  
N Billerica, MA

CHAIN OF CUSTODY RECORD

Site #: S50200MA  
Contact Name: Bonnie Mace  
Contact Phone: 978-621-1213

No: MA23100001-002

Rockbestos Site  
Lab: NERL  
Lab Phone:

| Lab # | Sample #      | Location | Analyses | Matrix      | Sample Date | Sample Time | Numb Cont | Container | Preservative |
|-------|---------------|----------|----------|-------------|-------------|-------------|-----------|-----------|--------------|
|       | S50200MA-0021 | ACM-20   | Asbestos | Soil/Debris | 4/24/2024   | 10:20       | 1         | poly bag  | 4 C          |
|       | S50200MA-0022 | ACM-21   | Asbestos | Soil/Debris | 4/24/2024   | 10:22       | 1         | poly bag  | 4 C          |
|       | S50200MA-0023 | ACM-22   | Asbestos | Soil/Debris | 4/24/2024   | 10:24       | 1         | poly bag  | 4 C          |
|       | S50200MA-0024 | ACM-23   | Asbestos | Soil/Debris | 4/24/2024   | 10:26       | 1         | poly bag  | 4 C          |
|       | S50200MA-0025 | ACM-24   | Asbestos | Soil/Debris | 4/24/2024   | 10:28       | 1         | poly bag  | 4 C          |
|       | S50200MA-0026 | ACM-25   | Asbestos | Soil/Debris | 4/24/2024   | 10:30       | 1         | poly bag  | 4 C          |
|       | S50200MA-0027 | ACM-26   | Asbestos | Soil/Debris | 4/24/2024   | 10:32       | 1         | poly bag  | 4 C          |
|       | S50200MA-0028 | ACM-27   | Asbestos | Soil/Debris | 4/24/2024   | 10:34       | 1         | poly bag  | 4 C          |
|       | S50200MA-0029 | ACM-28   | Asbestos | Soil/Debris | 4/24/2024   | 10:36       | 1         | poly bag  | 4 C          |
|       | S50200MA-0030 | ACM-29   | Asbestos | Soil/Debris | 4/24/2024   | 10:38       | 1         | poly bag  | 4 C          |
|       | S50200MA-0031 | ACM-30   | Asbestos | Soil/Debris | 4/24/2024   | 10:40       | 1         | poly bag  | 4 C          |
|       | S50200MA-0032 | ACM-31   | Asbestos | Soil/Debris | 4/24/2024   | 10:42       | 1         | poly bag  | 4 C          |
|       | S50200MA-0033 | ACM-32   | Asbestos | Soil/Debris | 4/24/2024   | 10:44       | 1         | poly bag  | 4 C          |
|       | S50200MA-0034 | ACM-33   | Asbestos | Soil/Debris | 4/24/2024   | 10:46       | 1         | poly bag  | 4 C          |
|       | S50200MA-0035 | ACM-34   | Asbestos | Soil/Debris | 4/24/2024   | 10:48       | 1         | poly bag  | 4 C          |
|       | S50200MA-0036 | ACM-35   | Asbestos | Soil/Debris | 4/24/2024   | 10:50       | 1         | poly bag  | 4 C          |
|       | S50200MA-0037 | ACM-36   | Asbestos | Soil/Debris | 4/24/2024   | 10:52       | 1         | poly bag  | 4 C          |
|       | S50200MA-0038 | ACM-37   | Asbestos | Soil/Debris | 4/24/2024   | 10:54       | 1         | poly bag  | 4 C          |
|       | S50200MA-0039 | ACM-38   | Asbestos | Soil/Debris | 4/24/2024   | 10:56       | 1         | poly bag  | 4 C          |

Special Instructions: Please send results to OSC Sherry Banks and OSC Abdine Quedraogo.

SAMPLES TRANSFERRED FROM  
CHAIN OF CUSTODY #

| Items/Reason | Relinquished by (Signature and Organization) | Date/Time                   | Received by (Signature and Organization) | Date/Time       | Sample Condition Upon Receipt |
|--------------|--|-----------------------------|--|-----------------|-------------------------------|
|              | Bonnie Mace                                  | 4/24/24<br>1530             |  |                 |                               |
|              | <del>Laura Hancock</del>                     | <del>4/25/24<br/>0925</del> |  |                 |                               |
|              | <del>Bonnie Mace</del>                       |                             |  |                 |                               |
|              |  | 4/25/24<br>0925             | Laura Hancock                            | 4/25/24<br>0925 |                               |

PN 24040027

USEPA  
START  
Weston Solutions, Inc.  
N Billerica, MA

CHAIN OF CUSTODY RECORD

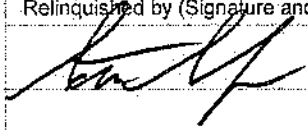
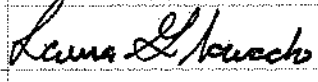
Site #: S50200MA  
Contact Name: Bonnie Mace  
Contact Phone: 978-621-1213


No: MA23100001-002

Rockbestos Site  
Lab: NERL  
Lab Phone:

| Lab # | Sample #      | Location | Analyses | Matrix      | Sample Date | Sample Time | Numb Cont | Container | Preservative |
|-------|---------------|----------|----------|-------------|-------------|-------------|-----------|-----------|--------------|
|       | S50200MA-0040 | ACM-39   | Asbestos | Soil/Debris | 4/24/2024   | 10:58       | 1         | poly bag  | 4 C          |
|       | S50200MA-0041 | ACM-40   | Asbestos | Soil/Debris | 4/24/2024   | 11:00       | 1         | poly bag  | 4 C          |
|       | S50200MA-0042 | ACM-41   | Asbestos | Soil/Debris | 4/24/2024   | 11:02       | 1         | poly bag  | 4 C          |
|       | S50200MA-0043 | ACM-42   | Asbestos | Soil/Debris | 4/24/2024   | 11:04       | 1         | poly bag  | 4 C          |
|       | S50200MA-0044 | ACM-43   | Asbestos | Soil/Debris | 4/24/2024   | 11:06       | 1         | poly bag  | 4 C          |
|       | S50200MA-0045 | ACM-44   | Asbestos | Soil/Debris | 4/24/2024   | 11:08       | 1         | poly bag  | 4 C          |
|       | S50200MA-0046 | ACM-45   | Asbestos | Soil/Debris | 4/24/2024   | 11:10       | 1         | poly bag  | 4 C          |
|       | S50200MA-0047 | ACM-46   | Asbestos | Soil/Debris | 4/24/2024   | 11:12       | 1         | poly bag  | 4 C          |
|       | S50200MA-0048 | ACM-47   | Asbestos | Soil/Debris | 4/24/2024   | 11:14       | 1         | poly bag  | 4 C          |
|       | S50200MA-0049 | ACM-48   | Asbestos | Soil/Debris | 4/24/2024   | 11:16       | 1         | poly bag  | 4 C          |
|       | S50200MA-0050 | ACM-49   | Asbestos | Soil/Debris | 4/24/2024   | 11:18       | 1         | poly bag  | 4 C          |
|       | S50200MA-0051 | ACM-50   | Asbestos | Soil/Debris | 4/24/2024   | 11:20       | 1         | poly bag  | 4 C          |
|       | S50200MA-0052 | ACM-51   | Asbestos | Soil/Debris | 4/24/2024   | 11:22       | 1         | poly bag  | 4 C          |
|       | S50200MA-0053 | ACM-52   | Asbestos | Soil/Debris | 4/24/2024   | 11:24       | 1         | poly bag  | 4 C          |
|       | S50200MA-0054 | ACM-53   | Asbestos | Soil/Debris | 4/24/2024   | 11:26       | 1         | poly bag  | 4 C          |
|       | S50200MA-0055 | ACM-54   | Asbestos | Soil/Debris | 4/24/2024   | 11:30       | 1         | poly bag  | 4 C          |
|       | S50200MA-0056 | ACM-55   | Asbestos | Soil/Debris | 4/24/2024   | 11:32       | 1         | poly bag  | 4 C          |
|       | S50200MA-0057 | ACM-56   | Asbestos | Soil/Debris | 4/24/2024   | 11:36       | 1         | poly bag  | 4 C          |
|       | S50200MA-0058 | ACM-57   | Asbestos | Soil/Debris | 4/24/2024   | 11:38       | 1         | poly bag  | 4 C          |

|   |  |
|---|--|
| Special Instructions: Please send results to OSC Sherry Banks and OSC Abdine Quedraogo. | SAMPLES TRANSFERRED FROM<br>CHAIN OF CUSTODY # |
|---|--|

| Items/Reason | Relinquished by (Signature and Organization)  | Date/Time       | Received by (Signature and Organization)   | Date/Time       | Sample Condition Upon Receipt |
|--------------|---|-----------------|--|-----------------|-------------------------------|
|              |  | 4/25/24<br>0925 |  | 4/25/24<br>0925 |                               |
|              |   |                 |  |                 |                               |
|              |   |                 |  |                 |                               |
|              |   |                 |  |                 |                               |

| Items/Reason | Relinquished by (Signature and Organization)  | Date/Time       | Received by (Signature and Organization) | Date/Time       | Sample Condition Upon Receipt |
|--------------|---|-----------------|--|-----------------|-------------------------------|
|              |  | 4/25/24<br>0925 | Luma L. Howards                          | 4/25/24<br>0925 |                               |
|              |   |                 |  |                 |                               |
|              |   |                 |  |                 |                               |

## Precautionary Measures Against Hidden Hazards in Laboratory Samples

### Notice to Laboratory Personnel

#### Background

Under the authority of Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or Superfund) of 1980, Section 311 of the Clean Water Act, and Subtitle I of the Resource Conservation and Recovery Act (RCRA), EPA has been delegated the responsibility to undertake response actions with respect to the release or potential release of oil, petroleum, or hazardous substances that pose a substantial threat to human health or welfare, or the environment. In addition, EPA provides technical assistance to help mitigate endangerment of public health, welfare, or the environment during other emergencies and natural disasters.

EPA's successful implementation of these emergency response action responsibilities requires that technical support capabilities be provided in the form of the contracted Superfund Technical Assessment and Response Team V (START) for EPA Region I New England under START V Contract 68HE0120F0027.

#### Hazard Communication

The samples which accompany this notice have been shipped to your laboratory for analysis in accordance with applicable D.O.T or IATA Regulations and were collected by Weston Solutions, Inc. (WESTON) START and were tentatively designated by the field response team as either environmental or hazardous material samples.

In general, *Environmental* Samples are collected from streams, farm ponds, small lakes, wells, and off-site soils that are not reasonably expected to be contaminated with hazardous materials. Samples of on-site soils or water, and materials collected from drums, bulk storage tanks, obviously contaminated ponds, impoundments, lagoons, pools, and leachates from hazardous waste sites are considered *Hazardous Samples*. Samples which are obtained from a known radioactive material contamination site or which demonstrate beta or gamma activity greater than three times average background as scanned with a Geiger-Mueller radiation survey meter are considered *Radioactive Samples*.

The samples which accompany this notice have been tentatively classified by the field response team as one or more of the following categories:

☒ Environmental      ☐ Hazardous      ☐ Comb. (Environ. & Haz)      ☐ Radioactive

The field team which collected the samples used one of the following Level(s) of personal protections as designated by EPA and OSHA conventions to provide protections against possible radiological or chemical exposure:

Level A      Level B      Level C      ☒ Level D

This information is intended for use as a guide for the safe handling of potentially hazardous laboratory samples in accordance with EPA and OSHA regulations. The sample classification(s) and Level(s) of personal protection used by WESTON START are not represented to be, nor are they adequate or applicable in all situations, nor are they intended to serve as substitutes for professional/personal judgement.

This form was prepared by:

Bonnie Mall

Date:

4/24/24

AD No.

23-10-0001

Task  
Case No.

0200

WESTON Office:

Weston, Solutions Inc. - START Region I

Phone: (978) 552-2100

Address:

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North Billerica, Massachusetts 01862

Fax: (978) 689-2794

Laboratory Name:

NERL/LSASD

Address:

N. Chelmsford

**US EPA REGION 1  
SAMPLE RECEIPT CHECKLIST**

|   |  |
|---|--|
| <b>PROJ #:</b> 24040027   | <b>RECEIPT DATE:</b> 4/25/24   |
| <b>SURVEY NAME:</b> Former Rockbestos<br><b>LOCATION:</b> Clinton, MA | <b>REC'D BY:</b> Laura Glowacki (ESAT)                                       |
| <b>OSC/PO:</b> Abdine Ouedraogo                                       | <b>SITE ID:</b> 01TC <b>SUPERFUND:</b> Y <input checked="" type="checkbox"/> |

|   |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
|---|---------------------------------------|---------------------------------------|-----------|---------------------------------------|----------------------------------|---------------------------------------|----------|---------------------------------------|--------------------------------|---------------------------------------|-------------------------------------|---------------------------------------|---------------------------|--|----------------------------|--|-------------------------|---------------------------------------|------------------------|---------------------------------------|---|--|-------------------|--|--------------------------------|---------------------------------------|-------------------------------|---------------------------------------|--------------------------------|---------------------------------------|--------------------------------|---------------------------------------|----------------------------------|--|---|
| <p><b>WERE SAMPLES SHIPPED?</b> _____</p> <p><b>TRACKING #:</b> _____</p> <p><b>DATE/SENT:</b> _____</p> <p><b>NO.</b> <input checked="" type="checkbox"/> <b>Hand Delivered</b></p> <p><b>COOLER TEMPERATURE UPON ARRIVAL</b> <sup>25</sup> _____ °C / NA</p> <table style="width: 100%;"> <tr> <td style="width: 50%;">CHAIN OF CUSTODY PRESENT?</td> <td style="width: 50%; text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>COMPLETE?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>CUSTODY SEALS PRESENT ON COOLER?</td> <td style="text-align: center;">N <input checked="" type="checkbox"/></td> </tr> <tr> <td>SAMPLES?</td> <td style="text-align: center;">N <input checked="" type="checkbox"/></td> </tr> <tr> <td>WERE SAMPLE CONTAINERS INTACT?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>WAS SAMPLE PRESERVATION DOCUMENTED?</td> <td style="text-align: center;">N <input checked="" type="checkbox"/></td> </tr> <tr> <td>COC      Sample Container</td> <td></td> </tr> <tr> <td>APPROPRIATE SAMPLES VOLUME</td> <td></td> </tr> <tr> <td>FOR REQUESTED ANALYSIS?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>SAMPLES AND COC MATCH?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td colspan="2">IF ANY PROBLEMS WAS PROJECT MANAGER NOTIFIED?</td> </tr> <tr> <td colspan="2">BY WHOM? NA _____</td> </tr> <tr> <td>APPROPRIATE SAMPLE CONTAINERS?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>SAMPLES WITHIN HOLDING TIMES?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>ALL ANALYSIS SPECIFIED ON COC?</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td>DATE/TIME OF COLLECTION ON COC</td> <td style="text-align: center;">Y <input checked="" type="checkbox"/></td> </tr> <tr> <td colspan="2"><b>TURN-AROUND TIME: 28 days</b></td> </tr> </table> | CHAIN OF CUSTODY PRESENT?             | Y <input checked="" type="checkbox"/> | COMPLETE? | Y <input checked="" type="checkbox"/> | CUSTODY SEALS PRESENT ON COOLER? | N <input checked="" type="checkbox"/> | SAMPLES? | N <input checked="" type="checkbox"/> | WERE SAMPLE CONTAINERS INTACT? | Y <input checked="" type="checkbox"/> | WAS SAMPLE PRESERVATION DOCUMENTED? | N <input checked="" type="checkbox"/> | COC      Sample Container |  | APPROPRIATE SAMPLES VOLUME |  | FOR REQUESTED ANALYSIS? | Y <input checked="" type="checkbox"/> | SAMPLES AND COC MATCH? | Y <input checked="" type="checkbox"/> | IF ANY PROBLEMS WAS PROJECT MANAGER NOTIFIED? |  | BY WHOM? NA _____ |  | APPROPRIATE SAMPLE CONTAINERS? | Y <input checked="" type="checkbox"/> | SAMPLES WITHIN HOLDING TIMES? | Y <input checked="" type="checkbox"/> | ALL ANALYSIS SPECIFIED ON COC? | Y <input checked="" type="checkbox"/> | DATE/TIME OF COLLECTION ON COC | Y <input checked="" type="checkbox"/> | <b>TURN-AROUND TIME: 28 days</b> |  | <p><b>COMMENTS:</b></p> <p>Debris samples</p> <p>42 \$ASBES</p> |
| CHAIN OF CUSTODY PRESENT?   | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| COMPLETE?   | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| CUSTODY SEALS PRESENT ON COOLER?  | N <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| SAMPLES?  | N <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| WERE SAMPLE CONTAINERS INTACT?  | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| WAS SAMPLE PRESERVATION DOCUMENTED?   | N <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| COC      Sample Container   |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| APPROPRIATE SAMPLES VOLUME  |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| FOR REQUESTED ANALYSIS?   | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| SAMPLES AND COC MATCH?  | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| IF ANY PROBLEMS WAS PROJECT MANAGER NOTIFIED?   |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| BY WHOM? NA _____   |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| APPROPRIATE SAMPLE CONTAINERS?  | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| SAMPLES WITHIN HOLDING TIMES?   | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| ALL ANALYSIS SPECIFIED ON COC?  | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| DATE/TIME OF COLLECTION ON COC  | Y <input checked="" type="checkbox"/> |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |
| <b>TURN-AROUND TIME: 28 days</b>  |                                       |                                       |           |                                       |                                  |                                       |          |                                       |                                |                                       |                                     |                                       |                           |  |                            |  |                         |                                       |                        |                                       |   |  |                   |  |                                |                                       |                               |                                       |                                |                                       |                                |                                       |                                  |  |   |