



Howland Company, LLC

WORLD CLASS ENGINEERS AND ENVIRONMENTAL PROFESSIONALS

To: Mr. J.R. Rinaldi
Canton, Building Department
218 Cleveland Avenue SW
Canton, Ohio 44702

Ref. No.: H211009-1500
October 29, 2021

Ph. (330) 489-3258

**LIMITED ASBESTOS SAMPLING
2206 13TH STREET NE
CANTON, STARK COUNTY, OHIO 44705**

Dear Mr. Rinaldi;

Howland Company, LLC. (Howland Company) is presenting the following letter report summarizing the Limited Asbestos Sampling (LAS) completed at the vacant two story, brick veneer sided, multi-bay industrial facility located at 2206 13th Street NE, Stark County, Canton, Ohio (facility). The LAS was completed in order to identify any suspect asbestos containing materials (SACMs) and regulated asbestos containing materials (RACMs) that would require abatement prior to demolition of the facility.

SACMs may be treated as an asbestos containing material (ACMs) or tested under proper protocol to determine asbestos content. *Howland Company* will utilize the following terms to address SACMs identified during the completion of the LAS:

- Asbestos Containing Material (ACM);
Under the Asbestos Hazard Emergency Response Act (AHERA) Regulation (40 CFR Part 763, Subpart E) when referring to a school building means any material or product which contains more than 1-percent (%) asbestos.
- Assumed Asbestos Containing Materials (assumed ACMs);
Under AHERA Regulation (40 CFR Part 763, Subpart E), ACMs that are identified in or on the interior structural members or other parts of a school building.
- Presumed Asbestos Containing Materials (PACMs); and
Under the Occupational Safety & Health Administration (OSHA) - Asbestos in Construction Standard (29 CFR 1926.1101) - PACM mean thermal system insulation and surfacing materials found in buildings constructed no later than 1980.

Howland Company completed the LAS in general accordance with the Asbestos Hazard Emergency Response Act (AHERA) 40 Code of Federal Regulations (CFR) Part 763 Subpart E. SACMs are grouped into three (3) types of materials:

- Surfacing materials;
- Thermal system insulation (TSI); and
- Miscellaneous materials.

The SACMs are then evaluated based on their condition as follows:

General Damage Category	AHERA Damage Category	Criteria
Good	No Damage	No Damage
Fair	Damage	Up to 10% overall damage, Up to 25% localized damage
Poor	Significant Damage	Over 10% overall damage, Over 25% localized damage

Under AHERA, *surfacing materials are materials that are sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing or other purposes.* The following number of random bulk samples are recommended to be collected based on the size of the homogenous area (HA);

Size of Homogenous Area	AHERA Minimum Number of Bulk Samples to be Collected
less than 1,000-square feet (ft ²)	3
between 1,000 & 5,000-ft ²	5
greater than 5,000-ft ²	7

At least three (3) random bulk samples from TSI, except one (1) sample for less than 6-linear feet (ft) or 6-ft², and generally three (3) samples from mudded fittings, unless the materials are treated as assumed ACMs or PACMs. *(Bulk samples are not required to be collected from any homogenous area where the accredited inspector has determined that the TSI is fiberglass, foam glass, rubber, or other non-ACBM.*

Miscellaneous materials require samples, thus implying at least two (2) samples from each SACM classified as a Miscellaneous Material. Materials that yield asbestos contents greater than 1.0-percent (%) are deemed asbestos containing materials (ACMs).

On October 22, 2021, Mr. Edward Barone (Ohio AHES #ES35916) with *Howland Company*, was on-site to collect bulk samples at the facility. Based on the completed visual inspection of the structure, the following PACMs were identified in the facility:

- **The western portion of the facility had an approximate 2,000-ft² fire damaged section of building that was burned down to the basement/pits. Due to the extent of the damage, the materials in this area could not be properly assessed and therefore no samples were taken. All material from this section must be treated as RACM and disposed of at a properly licensed facility.**

Based on the completed visual inspection, the facility had the following assumed ACMs located within the facility:

- Miscellaneous material in the form of asphalt roofing material located on the facility roof throughout the facility (approximately 144,267-ft², Cat I, Non-friable, good); and
- Miscellaneous material in the form of 9-in by 9-in vinyl floor tile and accompanying mastic located on the wood floors in the tower offices (approximately 1,012-ft², Cat I, Non-friable, good).

Based on the completed visual inspection of the structure, the following SACMs were identified in the

facility:

- Miscellaneous material in the form of gypsum board walls located on the 1st Floor of the east section of the facility;
- Miscellaneous material in the form of gypsum board ceiling located in the east section of the facility;
- Miscellaneous material in the form of window glazing located on the exterior window of the former CMU car wash structure in the SE section of the facility;
- Miscellaneous material in the form of roofing material located in the fire damaged NE section of the facility;
- Miscellaneous material in the form of gypsum board walls located on the 2nd floor of the NE section of the facility;
- Miscellaneous material in the form gypsum board ceiling located on the 2nd floor of the NE section of the facility;
- Miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the north office section of the facility;
- Miscellaneous material in the form of gypsum board walls located in the north office section of the facility;
- Miscellaneous material in the form of roofing material located in the fire damaged south section of the facility;
- Miscellaneous material in the form of gypsum board walls located in the fire damaged south section of the facility;
- Miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the west office section of the facility;
- Miscellaneous material in the form of gypsum board walls located in the west office section of the facility;
- Miscellaneous material in the form of textured gypsum board ceiling located in the west office section of the facility;
- Miscellaneous material in the form of 12-in by 12-in ceiling tile located under the awning in front of the NW tower;
- Miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the NW tower offices;
- Miscellaneous material in the form of gypsum board walls located in the NW tower offices; and
- Surfacing material in the form of hard wall plaster located on the NW tower walls (3 Levels).

A total of thirty-eight (38) samples were collected from the facility. The samples collected were as follows:

- Two (2) samples of miscellaneous material in the form of gypsum board walls located on the 1st Floor of the east section of the facility (01-001, 01-002, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board ceiling located in the east section of the facility (02-003, 02-004, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of window glazing located on the exterior window of the former CMU car wash structure in the SE section of the facility (03-005, 03-006, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of roofing material located in the fire damaged NE section of the facility (04-007, 04-008, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board walls located on the 2nd floor of the NE section of the facility (05-009, 05-010, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board ceiling located on the 2nd floor of the NE section of the facility (06-011, 06-012, Cat II, Non-Friable);

- Two (2) samples of miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the north office section of the facility (07-013, 07-014, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board walls located in the north office section of the facility (08-015, 08-016, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of roofing material located in the fire damaged south section of the facility (09-017, 09-018, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board walls located in the fire damaged south section of the facility (10-019, 10-020, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the west office section of the facility (11-021, 11-022, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board walls located in the west office section of the facility (12-023, 12-024, Cat II, Non-Friable);
- Three (3) samples of miscellaneous material in the form of textured gypsum board ceiling located in the west office section of the facility (13-025, 13-026, 13-027, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of 12-in by 12-in ceiling tile located under the awning in front of the NW tower (14-028, 14-029, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of 4-ft by 2-ft ceiling tile located in the NW tower offices (15-030, 15-031, Cat II, Non-Friable);
- Two (2) samples of miscellaneous material in the form of gypsum board walls located in the NW tower offices (16-032, 16-033, Cat II, Non-Friable); and
- Five (5) samples of surfacing material in the form of hard wall plaster located on the NW tower walls (3 Levels) (17-034, 17-035, 17-036, 17-037, 17-038, Cat II, Non-Friable).

The samples were bagged, labeled, and sent under a completed chain-of-custody to Eurofins CEI Labs, Inc. (CEI Labs) of Cary, North Carolina for analysis. Asbestos content was determined using Polarized Light Microscopy (PLM) with dispersion staining, as per Appendix A, Subpart F, 40 Code of Federal Regulations (CFR) Part 763, Section 1, Polarized Light Microscopy in accordance with the National Emission Standards for Hazardous Air Pollutants 40 CFR PART 61, Subpart M (Asbestos NESHAP) the following definitions apply:

- Category I nonfriable asbestos-containing material:
means asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1 percent asbestos as determined using the methods in Appendix E, subpart E, 40 CFR part 763, Section 1, Polarized Light Microscopy.
- Category II nonfriable asbestos-containing material;
means any material, excluding Category I nonfriable ACM containing more than 1 percent asbestos as determined using the methods in Appendix E, subpart E, 40 CFR part 763, Section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
- Regulated asbestos-containing material (RACM) means:
 - *Friable asbestos material;*
 - *Category I nonfriable ACM that has become friable;*
 - *Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or*
 - *Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.*

Based on the analytical results, four (4) of the samples yielded the presence of asbestos in the facility. The samples where asbestos is present are as follows:

- **Sample 03-005 (Window Glazing) yielded an asbestos content of 5.0% and was taken from the window glazing located on the exterior window of the former CMU car wash structure in the SE section of the facility;**
- **Sample 04-007 (Roofing Tar & Felt) yielded asbestos contents of 5.0% and was taken from the fire damaged roofing material located in the NE section of the facility;**
- **Sample 09-017 (Roofing Material) yielded an asbestos content of 2.0% and was taken from the fire damaged roofing material located in the south section of the facility; and**
- **Sample 17-034 (Texture) yielded an asbestos content of 2.0% and was taken from the hard wall plaster located on the NW tower walls.**

If the asbestos content indicated is greater than 1.0% per 40 CFR 61 National Emission Standard for Hazardous Air Pollutants and determined by a method other than point counting, the asbestos content must be verified by point counting using PLM if the material is to be deemed a non-ACM.

On October 28, 2021, a request for point count analysis was forwarded to CEI Labs, directing them to be analyzed by point count by PLM. The results are as follows:

- **Sample 17-034 (Texture) yielded an asbestos content of 1.3% and was taken from the hard wall plaster located on the NW tower walls.**

Following completion of the asbestos sampling and review of the analytical results, the following ACMs were identified in the facility:

Category I Materials:

- Miscellaneous material in the form of asphalt roofing material located on the facility roof throughout the facility (approximately 144,267-ft², Cat I, Non-friable, good);
- Miscellaneous material in the form of 9-in by 9-in vinyl floor tile and accompanying mastic located on the wood floors in the tower offices (approximately 1,012-ft², Cat I, Non-friable, good);

Category I Non-friable ACMs can remain with the facility, as long as, they remain intact throughout the demolition process, and disposed of at a construction and demolition debris landfill that is permitted to accept Category I non-friable ACMs. For the existing concrete slab to be used as clean hard fill, vinyl flooring and accompanying mastic must be abated beforehand.

Category II Materials:

- **Miscellaneous material in the form of window glazing located on the exterior window of the former CMU car wash structure in the SE section of the facility (approximately 100-ft², Cat II, Non-friable, good);**

Category II Non-Friable ACMs are required to be removed prior to the on-set of demolition, if they can be safely removed without subjecting the workers to unsafe work conditions. Category II non-friable ACMs are required to be disposed of at a licensed asbestos landfill permitted to accept friable ACMs.

Regulated Asbestos Containing Materials (RACMs):

- **RACM in the form of a fire damaged debris pile located on the west end of the facility (approximately 6,000-ft³, RACM, Friable);**
- **Surfacing material in the form of hard wall plaster located on the NW tower walls (All 3 Floors) (approximately 4,654-ft², RACM, Friable);**
- **Miscellaneous material in the form of roofing material located in the fire damaged NE section of the facility (approximately 16,311-ft², RACM, Friable, good); and**
- **Miscellaneous material in the form of roofing material located in the fire damaged south section of the facility (approximately 2,021-ft², RACM, Friable, good).**

RACMs, Category I and Category II materials that has been rendered friable must be treated as a RACM, removed prior to demolition activities, and disposed of at a licensed asbestos landfill that is permitted to accept friable ACMs.

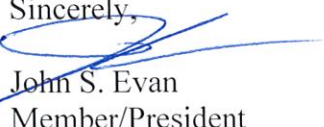
Approximate Amount of Asbestos-Containing Materials to be Removed (Prior to Demolition or Renovation)					
	Material to be Removed			Material to Remain (Demo)	
	RACM	Non-friable ACM		Non-friable ACM	
		Category I	Category II	Category I	Category II
Pipes (Linear Feet)					
Surface Area (ft ²)	22,986		100	145,279	
Facility (ft ³)	6,000				


A 10-working day notification is required to be filed with the Ohio EPA Central District Office (OEPA) prior to the planned abatement and demolition activities at the facility.

In the event, any unknown materials are encountered during the demolition and/or renovation of the vacant residential structure, work activities should be stopped, the material and/or area isolated, and the SACM tested to determine asbestos content. Based on whether or not the material is determined to be an ACM, the material must be handled in accordance with applicable federal, state and local regulations. The United States Environmental Protection Agency (USEPA) has only identified wood, metal, or glass as non-suspect material where sampling does not have to be considered (USEPA Letter # A960025, 10/12/1994). Under AHERA in regards to TSI exception 3 states - fibrous glass, foam glass, rubber, and styrofoam and other non-suspect materials can be determined as non-ACM by an accredited inspector. Carpeting historically, had NOT been manufactured with asbestos. As a result, the carpeting within the structure was not sampled. All bulk samples are collected for asbestos in accordance with the regulations adopted by the United States environmental protection agency pursuant to Title II of the "Federal Toxic Substances Control Act" found in 40 CFR Part 763.86, regardless of site or location with the exception of samples taken by employees or agents of federal, state, or local government for the purpose of determining compliance with applicable statutes or regulations.

Should you have any additional questions regarding this matter, please contact me at (330) 747-3975.

Sincerely,


 John S. Evan
 Member/President


 Edward Barone
 AHES#ES35916

Attachments: Table 1.0 PLM Asbestos Analytical Results;
 Photo Log & Sampling Map;
 October 22, 2021 Chain of Custody; and
 CEI Labs, Inc. Lab Results

**Table 1.0 – PLM Analytical Results
 2206 13th Street NE
 Canton, Ohio 44705**

Sample Number	Date	Type	Sample Location	Test Method	Result (%)	Condition of Material	Approximate Quantity	Type of Asbestos	Friable or Non-Friable	Category
01-001	10/22/21	Gypsum Board Walls	East Section	PLM	NAD	Good	5,076-ft ²	NA	NF	Cat II
01-002		Gypsum Board Walls	East Section	PLM	NAD	Good		NA	NF	Cat II
02-003	10/22/21	Gypsum Board Ceiling	East Section	PLM	NAD	Good	3,012-ft ²	NA	NF	Cat II
02-004		Gypsum Board Ceiling	East Section	PLM	NAD	Good		NA	NF	Cat II
03-005	10/22/21	Window Glazing	SE Structure	PLM	5.0%	Good	100-ft²	Chrysotile	NF	Cat II
03-006		Window Glazing	SE Structure	PLM	DNA	Good		Chrysotile	NF	Cat II
04-007	10/22/21	Roofing Material (Tar & Tar Felt)	NE Section	PLM	5.0%	Good	16,311-ft²	Chrysotile	F	RACM
04-008		Roofing Material (Tar & Tar Felt)	NE Section	PLM	DNA	Good		Chrysotile	F	RACM
05-009	10/22/21	Gypsum Board Walls	East – 2 nd Floor	PLM	NAD	Good	2,286-ft ²	NA	NF	Cat II
05-010		Gypsum Board Walls	East – 2 nd Floor	PLM	NAD	Good		NA	NF	Cat II
06-011	10/22/21	Gypsum Board Ceiling	East – 2 nd Floor	PLM	NAD	Good	1,204-ft ²	NA	NF	Cat II
06-012		Gypsum Board Ceiling	East – 2 nd Floor	PLM	NAD	Good		NA	NF	Cat II
07-013	10/22/21	4-ft by 2-ft Ceiling Tile	North Offices	PLM	NAD	Good	2,012-ft ²	NA	NF	Cat II
07-014		4-ft by 2-ft Ceiling Tile	North Offices	PLM	NAD	Good		NA	NF	Cat II
08-015	10/22/21	Gypsum Board Walls	North Offices	PLM	NAD	Good	4,156-ft ²	NA	NF	Cat II
08-016		Gypsum Board Walls	North Offices	PLM	NAD	Good		NA	NF	Cat II
09-017	10/22/21	Roofing Material (Silver Paint Positive)	South Section	PLM	2.0%	Good	2,021-ft²	Chrysotile	F	RACM
09-018		Roofing Material (Silver Paint Positive)	South Section	PLM	DNA	Good		Chrysotile	F	RACM
10-019	10/22/21	Gypsum Board Walls	South Section	PLM	NAD	Good	824- ft ²	NA	NF	Cat II
10-020		Gypsum Board Walls	South Section	PLM	NAD	Good		NA	NF	Cat II
11-021	10/22/21	4-ft by 2-ft Ceiling Tile	West Offices	PLM	NAD	Good	1,311-ft ²	NA	NF	Cat II
11-022		4-ft by 2-ft Ceiling Tile	West Offices	PLM	NAD	Good		NA	NF	Cat II
12-023	10/22/21	Gypsum Board Walls	West Offices	PLM	NAD	Good	2,006-ft ²	NA	NF	Cat II
12-024		Gypsum Board Walls	West Offices	PLM	NAD	Good		NA	NF	Cat II
13-025	10/22/21	Textured Gypsum Board Ceiling	West Offices	PLM	NAD	Good	412-ft ²	NA	NF	Cat II
13-026		Textured Gypsum Board Ceiling	West Offices	PLM	NAD	Good		NA	NF	Cat II
13-027		Textured Gypsum Board Ceiling	West Offices	PLM	NAD	Good		NA	NF	Cat II
14-028	10/22/21	12-in by 12-in Ceiling Tile	Tower Awning	PLM	NAD	Good	100-ft ²	NA	NF	Cat II
14-029		12-in by 12-in Ceiling Tile	Tower Awning	PLM	NAD	Good		NA	NF	Cat II

PLM - Polarized Light Microscopy
 DNA - Did Not Analyze, Stopped at First Positive in Group
 NA - No Asbestos Detected
 F - Friable
 NF - Non-Friable
 ft² - Square Feet
 Cat I - Category I
 Cat II - Category II
 NA - Not Applicable

Table 1.0 – PLM Analytical Results (Cont'd)
2206 13th Street NE
Canton, Ohio 44705

Sample Number	Date	Type	Sample Location	Test Method	Result (%)	Condition of Material	Approximate Quantity	Type of Asbestos	Friable or Non-Friable	Category
15-030	10/22/21	4-ft by 2-ft Ceiling Tile	Tower Offices	PLM	NAD	Good	1,286-ft ²	NA	NF	Cat II
15-031		4-ft by 2-ft Ceiling Tile	Tower Offices	PLM	NAD	Good		NA	NF	Cat II
16-032	10/22/21	Gypsum Board Walls	Tower Offices	PLM	NAD	Good	3,826-ft ²	NA	NF	Cat II
16-033		Gypsum Board Walls	Tower Offices	PLM	NAD	Good		NA	NF	Cat II
17-034	10/22/21	Hard Wall Plaster (Texture Positive)	Tower Walls	PLM	2.0%	Good	4,654-ft ²	Chrysotile	NF	Cat II
17-035		Hard Wall Plaster (Texture Positive)	Tower Walls	PLM	DNA	Good		Chrysotile	NF	Cat II
17-036		Hard Wall Plaster (Texture Positive)	Tower Walls	PLM	DNA	Good		Chrysotile	NF	Cat II
17-037		Hard Wall Plaster (Texture Positive)	Tower Walls	PLM	DNA	Good		Chrysotile	NF	Cat II
17-038		Hard Wall Plaster (Texture Positive)	Tower Walls	PLM	DNA	Good		Chrysotile	NF	Cat II

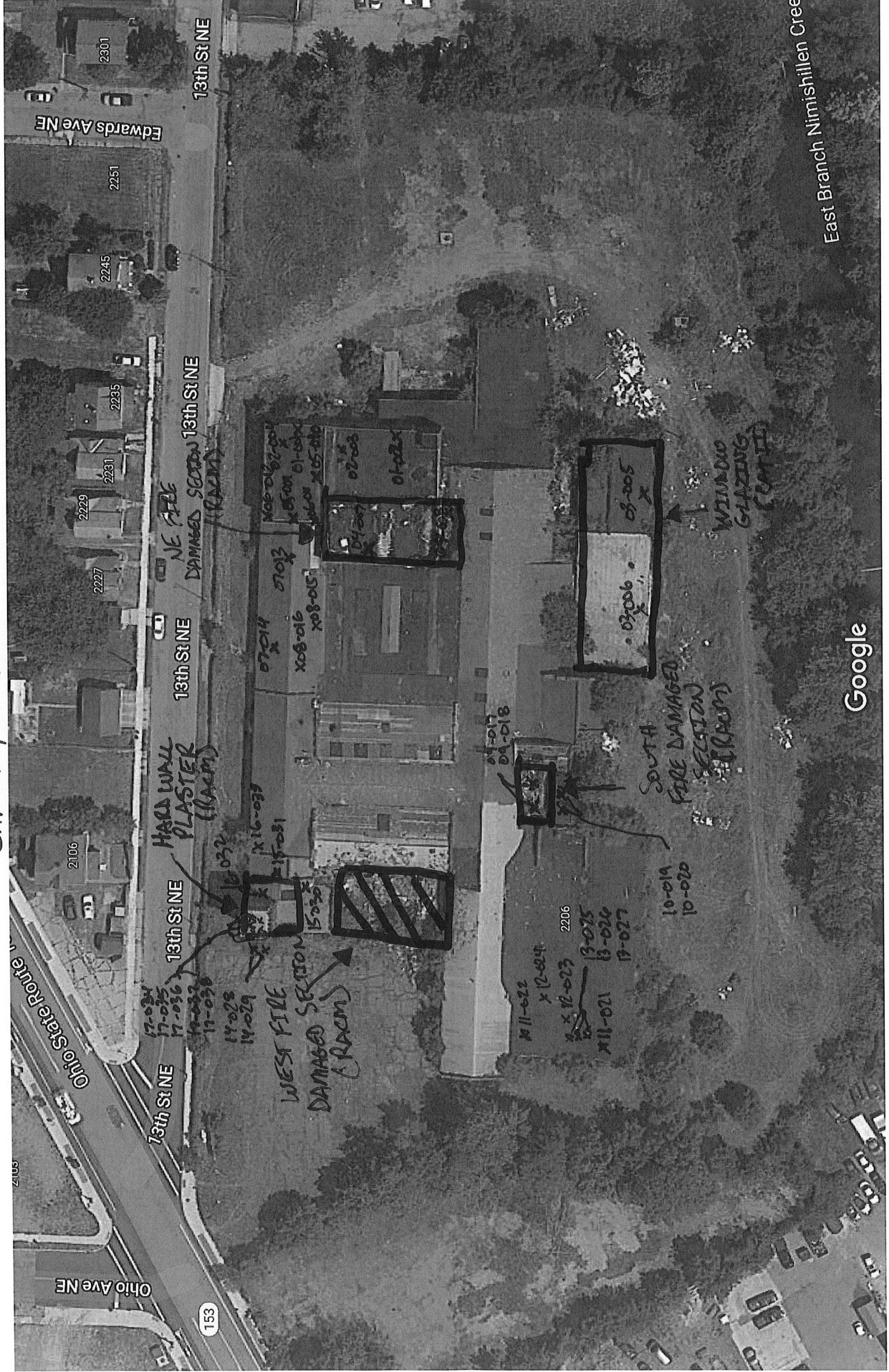
PLM - Polarized Light Microscopy
 DNA - Did Not Analyze, Stopped at First Positive in Group
 NAD - No Asbestos Detected
 F - Friable
 NF - Non-Friable
 Cat I - Category I
 Cat II - Category II
 ft² - Square Feet
 NA - Not Applicable

Table 2.0 – PCM Analytical Results
2206 13th Street NE
Canton, Ohio 44705

Sample Number	Date	Type	Sample Location	Test Method	Result (%)	Condition of Material	Approximate Quantity	Type of Asbestos	Friable or Non-Friable	Category
17-034	10/22/21	Hard Wall Plaster (Texture Positive)	Tower Walls	PCM	1.3%	Good	4,654-ft ²	Chrysotile	NF	Cat II
17-035		Hard Wall Plaster (Texture Positive)	Tower Walls	PCM	DNA	Good		Chrysotile	NF	Cat II
17-036		Hard Wall Plaster (Texture Positive)	Tower Walls	PCM	DNA	Good		Chrysotile	NF	Cat II
17-037		Hard Wall Plaster (Texture Positive)	Tower Walls	PCM	DNA	Good		Chrysotile	NF	Cat II
17-038		Hard Wall Plaster (Texture Positive)	Tower Walls	PCM	DNA	Good		Chrysotile	NF	Cat II

PCM - Polarized Light Microscopy
 DNA - Did Not Analyze, Stopped at First Positive in Group
 PCM - Point Count Method
 F - Friable
 NAD - No Asbestos Detected
 NF - Non-Friable
 Cat I - Category I
 Cat II - Category II
 ft² - Square Feet
 NA - Not Applicable

2206 13TH STREET NE
CANTON, OH 44705





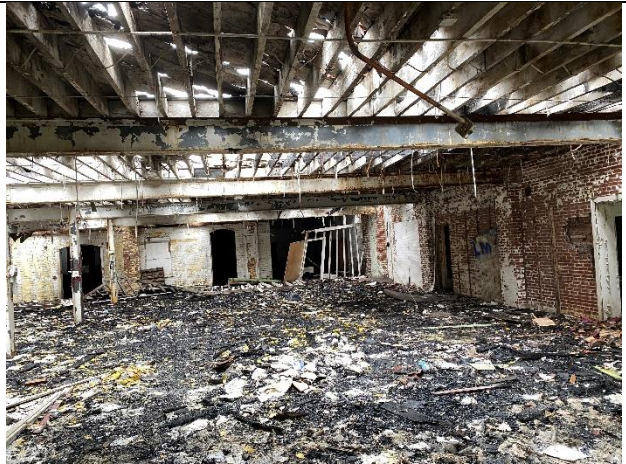
East Side of Facility



Basement View – Under East Section of Facility



1st Floor Office - East Section



1st Floor Level – North East Section (Fire Damaged)



South East Section



South East Storage Area



SE Section Exterior – Vinyl Siding over Asphalt Siding



SE Storage Building associated with former car wash



Former Car Wash Building (SE Section of Facility)



Former Car Wash Building – Interior View



South Bay of Facility



South Bay of Facility – Damaged Roof



Northeast Bay of Facility



Fire Damaged Roof – NE Section of Facility



North Bay of Facility



North Office Section of Facility



North Office Section of Facility



2nd Floor – NE Section of Facility



Fire Damaged 2nd Floor – NE Section



HVAC (Fiberglass) – North Office Section



North Bay 2 of the Facility



NW Bay of the Facility



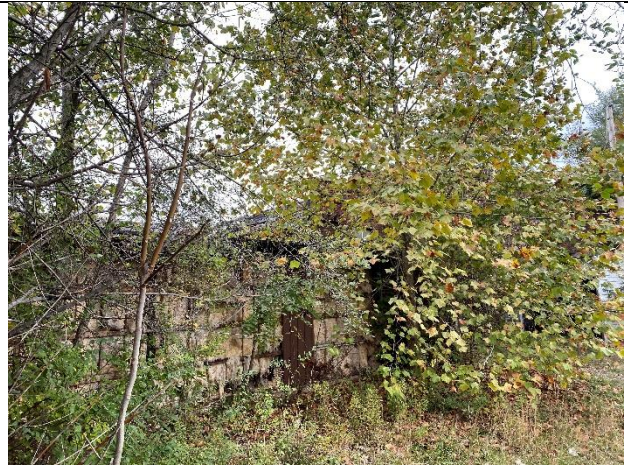
SW Bay of the Facility



Fire Damaged South Section of the Facility



South Storage Section (Drywall Section Remains)



Exterior View – South Section of Facility



West Office Section of Facility



West View of Facility – Outside West Offices



West Fire Damaged Section of Facility



Exterior NW Tower View



NW Office Section of Facility



Interior NW Tower View

October 28, 2021

Howland Company
7378 Southern Blvd Suite 200
Youngstown, OH 44512

CLIENT PROJECT: 2206 13th Street NE, H211009-1500
CEI LAB CODE: B219847

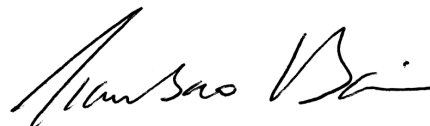
Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on October 25, 2021. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% asbestos by weight as determined by visual estimation.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Tianbao Bai, Ph.D., CIH
Laboratory Director



CEI

ASBESTOS ANALYTICAL REPORT

By: Polarized Light Microscopy

Prepared for

Howland Company

CLIENT PROJECT: 2206 13th Street NE, H211009-1500

LAB CODE: B219847

TEST METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 10/28/21

TOTAL SAMPLES ANALYZED: 31

SAMPLES >1% ASBESTOS: 5



CEI

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: 2206 13th Street NE, H211009-1500

LAB CODE: B219847

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
01-001	Layer 1	B157784	White	Mud	None Detected
	Layer 2	B157784	Gray	Gypsum Board	None Detected
01-002	Layer 1	B157785	White	Mud	None Detected
	Layer 2	B157785	Gray	Gypsum Board	None Detected
02-003	Layer 1	B157786	White	Mud	None Detected
	Layer 2	B157786	Gray	Gypsum Board	None Detected
02-004	Layer 1	B157787	White	Mud	None Detected
	Layer 2	B157787	Gray	Gypsum Board	None Detected
03-005		B157788	Tan	Window Glazing	Chrysotile 5%
03-006		B157789		Sample Not Analyzed per COC	
04-007	Layer 1	B157790	Gray,Black	Roofing - Shingle	None Detected
	Layer 2	B157790	Black	Roofing - Tar	Chrysotile 5%
	Layer 3	B157790	Black	Roofing - Tar Felt	Chrysotile 5%
	Layer 4	B157790	Gray	Roofing - Cementitious Material	None Detected
04-008		B157791		Sample Not Analyzed per COC	
05-009	Layer 1	B157792	White	Mud	None Detected
	Layer 2	B157792	Gray	Gypsum Board	None Detected
05-010	Layer 1	B157793	White	Mud	None Detected
	Layer 2	B157793	Gray	Gypsum Board	None Detected
06-011		B157794	White	Gypsum Board	None Detected
06-012		B157795	White	Gypsum Board	None Detected
07-013		B157796	Gray,White	Ceiling Tile	None Detected
07-014		B157797	Gray,White	Ceiling Tile	None Detected
08-015	Layer 1	B157798	White	Mud	None Detected
	Layer 2	B157798	Gray	Gypsum Board	None Detected
08-016	Layer 1	B157799	White	Mud	None Detected
	Layer 2	B157799	Gray	Gypsum Board	None Detected
09-017	Layer 1	B157800	Silver	Roofing - Silver Paint	Chrysotile 2%
	Layer 2	B157800	Gray,Black	Roofing - Shingle	None Detected
	Layer 3	B157800	Black	Roofing - Tar	None Detected
09-018		B157801		Sample Not Analyzed per COC	



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Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: 2206 13th Street NE, H211009-1500

LAB CODE: B219847

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
10-019	Layer 1	B157802	White	Texture	None Detected
	Layer 2	B157802	Gray	Gypsum Board	None Detected
10-020	Layer 1	B157803	White	Texture	None Detected
	Layer 2	B157803	Gray	Gypsum Board	None Detected
11-021		B157804	Gray,White	Ceiling Tile	None Detected
11-022		B157805	Gray,White	Ceiling Tile	None Detected
12-023	Layer 1	B157806	White	Texture	None Detected
	Layer 2	B157806	Gray	Gypsum Board	None Detected
12-024	Layer 1	B157807	White	Texture	None Detected
	Layer 2	B157807	Gray	Gypsum Board	None Detected
13-025	Layer 1	B157808	White	Texture	None Detected
	Layer 2	B157808	Gray	Gypsum Board	None Detected
13-026	Layer 1	B157809	White	Texture	None Detected
	Layer 2	B157809	Gray	Gypsum Board	None Detected
13-027	Layer 1	B157810	White	Texture	None Detected
	Layer 2	B157810	Gray	Gypsum Board	None Detected
14-028		B157811	Brown,White	Ceiling Tile	None Detected
14-029		B157812	Brown,White	Ceiling Tile	None Detected
15-030		B157813	Gray,Brown	Ceiling Tile	None Detected
15-031		B157814	Gray,Brown	Ceiling Tile	None Detected
16-032	Layer 1	B157815	White	Texture	None Detected
	Layer 2	B157815	Gray	Gypsum Board	None Detected
16-033	Layer 1	B157816	White	Texture	None Detected
	Layer 2	B157816	Gray	Gypsum Board	None Detected
17-034	Layer 1	B157817	Tan	Texture	Chrysotile 2%
	Layer 2	B157817	Pink	Plaster Skim Coat	None Detected
	Layer 3	B157817	Gray,Tan	Plaster Base Coat	None Detected
17-035		B157818		Sample Not Analyzed per COC	
17-036		B157819		Sample Not Analyzed per COC	
17-037		B157820		Sample Not Analyzed per COC	
17-038		B157821		Sample Not Analyzed per COC	

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
01-001 Layer 1 B157784	Mud	Heterogeneous	2%	Paint			None Detected
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157784	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
01-002 Layer 1 B157785	Mud	Heterogeneous	2%	Paint			None Detected
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157785	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
02-003 Layer 1 B157786	Mud	Heterogeneous	2%	Paint			None Detected
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157786	Gypsum Board	Heterogeneous	15%	Cellulose	80%	Gypsum	None Detected
		Gray	5%	Fiberglass			
		Fibrous					
		Bound					
02-004 Layer 1 B157787	Mud	Heterogeneous	2%	Paint			None Detected
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					



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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
7378 Southern Blvd Suite 200
Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous		Non-Fibrous	
Layer 2 B157787	Gypsum Board	Heterogeneous Gray Fibrous Bound	15% 5%	Cellulose Fiberglass	80% Gypsum	None Detected
03-005 B157788	Window Glazing	Heterogeneous Tan Fibrous Bound			70% 25% Binder Calc Carb	5% Chrysotile
03-006 B157789	Sample Not Analyzed per COC					
04-007 Layer 1 B157790	Roofing - Shingle	Heterogeneous Gray,Black Fibrous Bound	45%	Fiberglass	40% 15% Tar Gravel	None Detected
Layer 2 B157790	Roofing - Tar	Heterogeneous Black Fibrous Bound	20%	Cellulose	75% Tar	5% Chrysotile
Layer 3 B157790	Roofing - Tar Felt	Heterogeneous Black Fibrous Bound	20% 10%	Cellulose Fiberglass	65% Tar	5% Chrysotile
Layer 4 B157790	Roofing - Cementitious Material	Heterogeneous Gray Non-fibrous Tightly Bound			90% 10% Binder Silicates	None Detected
04-008 B157791	Sample Not Analyzed per COC					

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
05-009 Layer 1 B157792	Mud	Heterogeneous	88%	Cellulose	Binder	None Detected	
		White	10%		Calc Carb		
		Non-fibrous	2%		Paint		
		Bound					
Layer 2 B157792	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
05-010 Layer 1 B157793	Mud	Heterogeneous	88%	Cellulose	Binder	None Detected	
		White	10%		Calc Carb		
		Non-fibrous	2%		Paint		
		Bound					
Layer 2 B157793	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
06-011 B157794	Gypsum Board	Heterogeneous	20%	Cellulose	80%	Gypsum	None Detected
		White			<1%	Paint	
		Fibrous					
		Bound					
06-012 B157795	Gypsum Board	Heterogeneous	20%	Cellulose	80%	Gypsum	None Detected
		White			<1%	Paint	
		Fibrous					
		Bound					
07-013 B157796	Ceiling Tile	Heterogeneous	70%	Cellulose	2%	Paint	None Detected
		Gray,White	10%	Fiberglass	18%	Perlite	
		Fibrous					
		Bound					

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
07-014 B157797	Ceiling Tile	Heterogeneous Gray,White Fibrous Bound	70%	Cellulose	2%	Paint	None Detected
			10%	Fiberglass	18%	Perlite	
08-015 Layer 1 B157798	Mud	Heterogeneous White Non-fibrous Bound			2%	Paint	None Detected
					83%	Binder	
			15%	Calc Carb	15%	Calc Carb	
Layer 2 B157798	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
08-016 Layer 1 B157799	Mud	Heterogeneous White Non-fibrous Bound			2%	Paint	None Detected
					83%	Binder	
			15%	Calc Carb	15%	Calc Carb	
Layer 2 B157799	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
09-017 Layer 1 B157800	Roofing - Silver Paint	Heterogeneous Silver Non-fibrous Bound	3%	Cellulose	70%	Paint	2% Chrysotile
					15%	Binder	
					10%	Tar	
Layer 2 B157800	Roofing - Shingle	Heterogeneous Gray,Black Fibrous Bound	45%	Fiberglass	40%	Tar	None Detected
					15%	Gravel	

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
Layer 3 B157800	Roofing - Tar	Heterogeneous Black Fibrous Bound	45%	Fiberglass	40%	Tar	None Detected
			15%	Cellulose			
09-018 B157801	Sample Not Analyzed per COC						
10-019 Layer 1 B157802	Texture	Heterogeneous White Non-fibrous Bound			2%	Paint	None Detected
					83%	Binder	
					15%	Calc Carb	
Layer 2 B157802	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
10-020 Layer 1 B157803	Texture	Heterogeneous White Non-fibrous Bound			2%	Paint	None Detected
					83%	Binder	
					15%	Calc Carb	
Layer 2 B157803	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
11-021 B157804	Ceiling Tile	Heterogeneous Gray,White Fibrous Bound	70%	Cellulose	2%	Paint	None Detected
			10%	Fiberglass	18%	Perlite	
11-022 B157805	Ceiling Tile	Heterogeneous Gray,White Fibrous Bound	70%	Cellulose	2%	Paint	None Detected
			10%	Fiberglass	18%	Perlite	

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS				ASBESTOS
Lab ID	Description	Attributes	Fibrous		Non-Fibrous		%
12-023	Texture	Heterogeneous			2%	Paint	None Detected
Layer 1		White			83%	Binder	
B157806		Non-fibrous			15%	Calc Carb	
		Bound					
Layer 2	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
B157806		Gray					
		Fibrous					
		Bound					
12-024	Texture	Heterogeneous			2%	Paint	None Detected
Layer 1		White			83%	Binder	
B157807		Non-fibrous			15%	Calc Carb	
		Bound					
Layer 2	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
B157807		Gray					
		Fibrous					
		Bound					
13-025	Texture	Heterogeneous			2%	Paint	None Detected
Layer 1		White			83%	Binder	
B157808		Non-fibrous			15%	Calc Carb	
		Bound					
Layer 2	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
B157808		Gray					
		Fibrous					
		Bound					
13-026	Texture	Heterogeneous			2%	Paint	None Detected
Layer 1		White			83%	Binder	
B157809		Non-fibrous			15%	Calc Carb	
		Bound					

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
Layer 2 B157809	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
13-027 Layer 1 B157810	Texture	Heterogeneous White Non-fibrous Bound			2% 83% 15%	Paint Binder Calc Carb	None Detected
Layer 2 B157810	Gypsum Board	Heterogeneous Gray Fibrous Bound	15%	Cellulose	85%	Gypsum	None Detected
14-028 B157811	Ceiling Tile	Heterogeneous Brown,White Fibrous Bound	98%	Cellulose	2%	Paint	None Detected
14-029 B157812	Ceiling Tile	Heterogeneous Brown,White Fibrous Bound	98%	Cellulose	2%	Paint	None Detected
15-030 B157813	Ceiling Tile	Heterogeneous Gray,Brown Fibrous Bound	75% 5%	Cellulose Fiberglass	2% 18%	Paint Perlite	None Detected
15-031 B157814	Ceiling Tile	Heterogeneous Gray,Brown Fibrous Bound	75% 5%	Cellulose Fiberglass	2% 18%	Paint Perlite	None Detected

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
 7378 Southern Blvd Suite 200
 Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %		
			Fibrous	Non-Fibrous			
16-032 Layer 1 B157815	Texture	Heterogeneous	2%	Paint	None Detected		
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157815	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
16-033 Layer 1 B157816	Texture	Heterogeneous	2%	Paint	None Detected		
		White	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157816	Gypsum Board	Heterogeneous	15%	Cellulose	85%	Gypsum	None Detected
		Gray					
		Fibrous					
		Bound					
17-034 Layer 1 B157817	Texture	Heterogeneous	<1%	Paint	2% Chrysotile		
		Tan	83%	Binder			
		Non-fibrous	15%	Calc Carb			
		Bound					
Layer 2 B157817	Plaster Skim Coat	Heterogeneous	90%	Binder	None Detected		
		Pink	10%	Calc Carb			
		Non-fibrous					
		Bound					
Layer 3 B157817	Plaster Base Coat	Heterogeneous	60%	Binder	None Detected		
		Gray, Tan	40%	Silicates			
		Non-fibrous					
		Bound					
17-035 B157818	Sample Not Analyzed per COC						



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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
7378 Southern Blvd Suite 200
Youngstown, OH 44512

Lab Code: B219847
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
17-036 B157819	Sample Not Analyzed per COC				
17-037 B157820	Sample Not Analyzed per COC				
17-038 B157821	Sample Not Analyzed per COC				

LEGEND: Non-Anth = Non-Asbestiform Anthophyllite
Non-Trem = Non-Asbestiform Tremolite
Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORTING LIMIT: <1% by visual estimation

REPORTING LIMIT FOR POINT COUNTS: 0.25% by 400 Points or 0.1% by 1,000 Points

REGULATORY LIMIT: >1% by weight

Due to the limitations of the EPA 600 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. *Estimated measurement of uncertainty is available on request.*

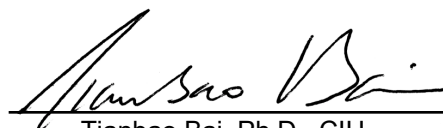
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Information provided by customer includes customer sample ID and sample description.

ANALYST: _____


Justin Shu

APPROVED BY: _____


Tianbao Bai, Ph.D., CIH
Laboratory Director



CEI

CHAIN OF CUSTODY

730 SE Maynard Road, Cary, NC 27511
 Tel: 866-481-1412; Fax: 919-481-1442

LAB USE ONLY:
CEI Lab Code: <u>B219847</u>
CEI Lab I.D. Range: <u>B157784-B157821</u>

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COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #:	Job Contact: Ed Barone
Company: Howland Company, LLC.	Email / Tel: EBarone@HowlandCompany.net
Address: 7378 Southern Boulevard, Suite 200 Boardman, Ohio 55412	Project Name: 2206 13th Street NE
Email: EBarone@HowlandCompany.net	Project ID#: H211009-1500
Tel: (330) 747-3975 Fax: (330) 747-3992	PO #:
	STATE SAMPLES COLLECTED IN: OH

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	8 HR	1 DAY	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (400)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (1000)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM GRAV w POINT COUNT	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM BULK	CARB 435	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCM AIR	NIOSH 7400	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	EPA AHERA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	NIOSH 7402	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR (PCME)	ISO 10312	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	ASTM 6281-15	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM BULK	CHATFIELD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST WIPE	ASTM D6480-05 (2010)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST MICROVAC	ASTM D5755-09 (2014)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM SOIL	ASTM D7521-16	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM VERMICULITE	CINCINNATI METHOD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM QUALITATIVE	IN-HOUSE METHOD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTHER:		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REMARKS / SPECIAL INSTRUCTIONS: Standard Rules Apply.		<input checked="" type="checkbox"/> Accept Samples <input type="checkbox"/> Reject Samples	
Relinquished By:	Date/Time	Received By:	Date/Time
Edward Barone	10/20/2021	CB	10/25 9:20

Samples will be disposed of 30 days after analysis



CEI

SAMPLING FORM

B219847

COMPANY CONTACT INFORMATION	
Company: Howland Company, LLC.	Job Contact: Ed Barone
Project Name: 2206 13th Street NE	
Project ID#: H211009-1500	Tel: (330) 747-3975

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
			PLM	TEM
01-001 & 01-002	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
02-003 & 02-004	Gypsum Board Ceilings		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
03-005 & 03-006	Window Glazing		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
04-007 & 04-008	Roofing Material		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
05-009 & 05-010	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
06-011 & 06-012	Gypsum Board Ceiling		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
07-013 & 07-014	Ceiling Tile		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
08-015 & 08-016	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
09-017 & 09-018	Roofing Material		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
10-019 & 10-020	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
11-021 & 11-022	Ceiling Tile		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
12-023 & 12-024	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
13-025	Textured Gypsum Board Ceiling		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
13-026	" " " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
13-027	" " " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
14-028 & 14-029	Ceiling Tile		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
15-030 & 15-031	Ceiling Tile		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
16-032 & 16-033	Gypsum Board Walls		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
17-034	Hard Wall Plaster		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
17-035	" " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
17-036	" " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
17-037	" " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
17-038	" " "		PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
			PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
			PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
			PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
			PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>
			PLM <input checked="" type="checkbox"/>	TEM <input type="checkbox"/>

October 28, 2021

Howland Company
7378 Southern Blvd Suite 200
Youngstown, OH 44512

CLIENT PROJECT: 2206 13th Street NE, H211009-1500 (Point Count)
CEI LAB CODE: B219847A

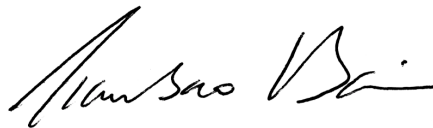
Dear Customer:

Enclosed are asbestos analysis results for PLM bulk samples received at our laboratory on October 25, 2021. The samples were analyzed for asbestos using polarized light microscopy (PLM) point count per the EPA 600 Method.

Sample results containing > 1% asbestos are considered asbestos-containing materials (ACMs) per the EPA regulatory requirements. The detection limit for the EPA 600 method is 0.25% for 400 point counts, or 0.1% for 1,000 point counts.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Tianbao Bai, Ph.D., CIH
Laboratory Director

ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

Howland Company

CLIENT PROJECT: 2206 13th Street NE, H211009-1500 (Point Count)

LAB CODE: B219847A

TEST METHOD: PLM Point Count
EPA 600 / R93 / 116 and EPA 600 / M4-82 / 020

REPORT DATE: 10/28/21



CEI

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: Howland Company
7378 Southern Blvd Suite 200
Youngstown, OH 44512

Lab Code: B219847A
Date Received: 10-25-21
Date Analyzed: 10-28-21
Date Reported: 10-28-21

Project: 2206 13th Street NE, H211009-1500 (Point Count)

ASBESTOS POINT COUNT PLM, EPA 600 METHOD

Client ID	Lab ID	Material Description	POINTS		ASBESTOS	
			Total	Asbestos	%	
17-034	B157817	Texture (400 Point Count)	400	5	1.3%	Chrysotile

LEGEND: None

METHOD: EPA 600 / M4 / 82 / 020 (40 CFR Part 763, Sub. E, App. E)

REPORTING LIMIT: 0.25% by 400 points or 0.1% by 1,000 points

REGULATORY LIMIT: >1% by weight

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins CEI. Eurofins CEI makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. Samples were received in acceptable condition unless otherwise noted. *Estimated measurement of uncertainty is available on request.* This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

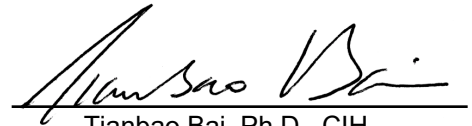
Information provided by customer includes customer sample ID, location, volume and area as well as date and time of sampling.

ANALYST:



Justin Shu

APPROVED BY:



Tianbao Bai, Ph.D., CIH
Laboratory Director