



1875 West Main Street · Bartow, FL 33830 www.A-C-T.com

863.533.2000

October 5, 2017

Suzanne Hunnicut, Capital Projects Manager Highlands County BCC 600 S. Commerce Avenue Sebring, FL 33870

SUBJECT: ASBESTOS SURVEY REPORT

530 S. EUCALYPTUS STREET A·C·T PROJECT NO. 18863

Dear Ms. Hunnicutt,

A·C·T Environmental and Infrastructure is pleased to submit our survey to determine the presence, location, and quantity of suspect asbestos-containing materials (ACM) from the structure located at 530 S. Eucalyptus Street in Sebring, Florida. The survey was performed on Thursday, November 9, 2017.

We have committed our experienced and trained personnel, our equipment, and our expertise in a manner that has allowed for an environmentally sound, safety conscious, and cost effective plan that successfully completed this project.

Should you have any questions or require additional information regarding the services provided, please call me at our Bartow office at 863-533-2000 ext 238.

We appreciate the opportunity to be of service in this regard.

Respectfully Submitted,

Eric Jonsson, CIH

Licensed Asbestos Consultant

AX-83

Licensed Business Organization

ZA-334



## **I. Executive Summary**

A-C-T Environmental & Infrastructure, Inc. (ACT) was contracted to perform a survey of the structure located at 530 S. Eucalyptus Street in Sebring, Florida to determine the presence, location, and quantity of suspect asbestos-containing materials (ACM). The asbestos survey was performed in accordance with 29 CFR 1910.1001 the OSHA general industry asbestos standard and the National Emission Standards for Hazardous Air Pollutants (NESHAP). The survey activities were performed on Friday, September 29, 2017 by an AHERA accredited Building Inspector and Florida-Licensed Asbestos Consultant, Mr. Eric Jonsson.

Based upon methods, procedures and limitations described in this report, laboratory results indicate that asbestos-containing material (ACM, greater than one percent asbestos, by definition) was not detected from the sampled materials.

Although ACM was not identified in the survey, wet demolition methods should be employed. In addition, DEP notification is required prior to any demolition activities.

Our findings are presented in detail throughout this report and its attachments.



## **II. SURVEY AND SAMPLING PROCEDURES**

The survey was performed in accordance with 29 CFR 1910.1001 the OSHA standard for general industry. Homogenous sampling areas were delineated in order to randomly obtain representative samples from each type of homogenous material. We must emphasize that it is not possible to survey every aspect or material of the subject property.

Bulk sampling was performed as an integral part of the survey procedure and was performed in accordance with 29 CFR 1910.1001. Following delineation of homogenous sampling areas, determined by visual survey, samples were collected from representative locations within each of the homogenous areas.

Sampling was performed using the following guidelines. The inspection focuses on identifying:

1) Surfacing Material, 2) Thermal System Insulation, 3) flooring Materials, and 4) roofing material, all of which are likely to contain asbestos. Samples were collected in a random manner utilizing the EPA Guidance Document titled "Asbestos in Buildings- Simplified Sampling Scheme for Friable Surfacing Materials" dated October 1985. A homogenous area is considered not to contain ACM only if the analysis results of all samples obtained from the area contained asbestos in amounts of less than one percent.



## **III. ASSESSMENT PROCEDURES**

Physical assessments of asbestos containing materials was performed in coordination with the facility survey and consisted of a multi-step procedure. In order to provide consistent assessments by inspectors, A-C-T has adopted the EPA's "Guidance for Assessing and Managing Exposure to Asbestos in Buildings" as a guideline for assessments. This document is currently used as text in the EPA approved inspector accreditation programs in numerous locations nationwide.

As the first step in assessment, the suspect material was classified as one of three general material types; surfacing material, thermal system insulation, or miscellaneous material.

- 1) Surfacing Material: ACM sprayed or trowelled on surfaces, such as acoustical plaster on ceilings and fireproofing material on structural members.
- 2) Thermal System Insulation: ACM applied to pipes, boilers, tanks, ducts, etc. to prevent heat loss or gain or water condensation, and
- 3) Miscellaneous Material: "other" ACM for example, ceiling and floor tiles, wallboard, and cement pipe.

The material was further categorized as friable or non-friable, based on the EPA's definition of a friable material, "when dry, may be pulverized, crumbled, or reduced to powder by hand pressure". Materials that were categorized as non-friable were not assessed beyond this point.

Next, an estimation of the material's current condition and percent damage would be performed so that the material could be defined as undamaged, damaged, or significantly damaged. The Inspector would assign a relative percent damage to the ACM based on its physical appearance at the time of the survey. This damage estimate would be further defined as being localized damage or distributed damage. The semi-quantitative definitions would then be used to group friable ACM into one of the following categories: damaged friable surfacing ACM, significantly damaged friable surfacing material, damaged or significantly damaged thermal system insulation, damaged friable miscellaneous ACM, significantly damaged friable miscellaneous ACM, and undamaged ACM.

In addition to a relative percent of damage, a further explanation of the type of damage would also be performed by characterizing the damage into one of the following general categories: deterioration,



physical damage, and water damage. At this point a qualitative rating of the material's overall condition; good, fair, or poor; would also be assigned.

Once the damage category is ascertained the material would be rated on the potential for future damage. This would be performed by taking into account the following factors: accessibility, potential for contact, influence of vibration, and potential for air erosion.

Finally these factors are compiled to produce an overall classification for the ACM. The classifications are:

- 1) Damaged or significantly damaged thermal system insulation.
- 2) Damaged friable surfacing ACM
- 3) Significantly damaged friable surfacing ACM
- 4) Damaged or significantly damaged friable miscellaneous ACM
- 5) ACM with potential for damage
- 6) ACM with potential for significant damage
- 7) Any remaining friable ACM or suspect friable ACM
- 8) Non-friable ACM or non-friable suspected ACM



## **IV. SAMPLING EVENT**

The purpose of this survey was to identify asbestos-containing materials (ACM) within the structure located at 530 S. Eucalyptus Street in Sebring, Florida.

Sampling was conducted in accordance with 29CFR 1910.1001. A total of 14 materials were analyzed from the 10 bulk samples collected from the property (see attached form 1 for a detailed list of samples and analytical results).

Sampling activities at the subject property were performed on Thursday, November 9, 2017. Sampled materials from the property included; cove base and the associated mastic, floor tile and the associated mastic, rolled vinyl flooring, joint compound, drywall, plaster material, stucco surfacing, window caulking, and roof material.

Samples collected during the survey were submitted to CEI Labs located at 730 SE Maynard Road in Cary, NC for analysis. CEI is an independent environmental laboratory certified by the National Voluntary Laboratory Accreditation Program (NVLAP accreditation # 101768-0).

Laboratory results indicate that asbestos-containing material (ACM, greater than one percent asbestos, by definition) was not detected from the sampled materials.

## **V. CONCLUSIONS**

Although ACM was not identified in the survey, wet demolition methods should be employed. In addition, DEP notification is required prior to any demolition activities.



#### **DISCLAIMER**

The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, expressed or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our clients unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, or the use of segregated portions of this report.



# **ATTACHMENTS**

PHOTOLOG

ASBESTOS SURVEY AND ASSESSMENT FORMS

ASBESTOS CHAIN OF CUSTODY

ASBESTOS ANALYTICAL RESULTS

PERSONNEL AND LABORATORY CERTIFICATIONS





PHOTO # 1: VIEW OF 530 S. EUCALYPTUS STREET, SEBRING, FLORIDA.



PHOTO # 2: VIEW OF SAMPLED COVE BASE AND MASTIC.





PHOTO # 3: VIEW OF SAMPLED FLOOR TILE AND MASTIC.



PHOTO # 4: VIEW OF SAMPLED FLOOR TILE AND MASTIC.





PHOTO # 5: VIEW OF SAMPLED ROLLED VINYL FLOORING.



PHOTO # 6: VIEW OF SAMPLED DRYWALL.





PHOTO # 7: VIEW OF SAMPLED JOINT COMPOUND.

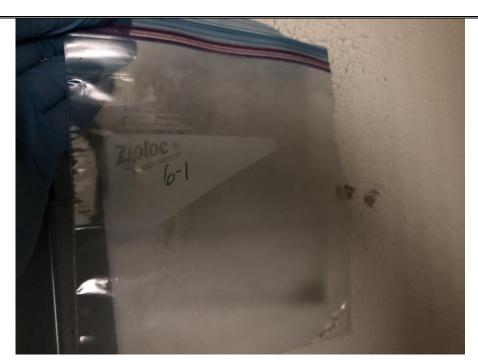


PHOTO #8: VIEW OF SAMPLED SKIM COAT PLASTER.





PHOTO # 9: VIEW OF SAMPLED BASE COAT PLASTER.

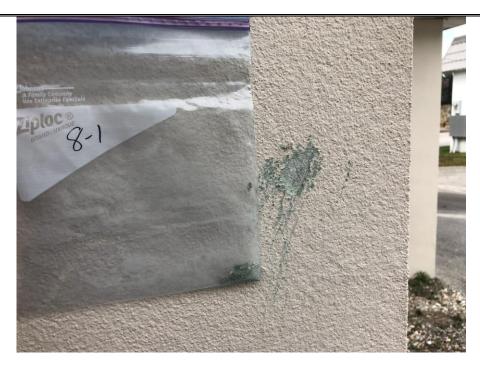


PHOTO # 10: VIEW OF SAMPLED STUCCO SURFACING.





PHOTO # 11: VIEW OF SAMPLED WINDOW CAULK.



PHOTO # 12: VIEW OF SAMPLED ROOF MATERIAL.





PHOTO # 13: VIEW OF GENERAL INTERIOR CONDITIONS.

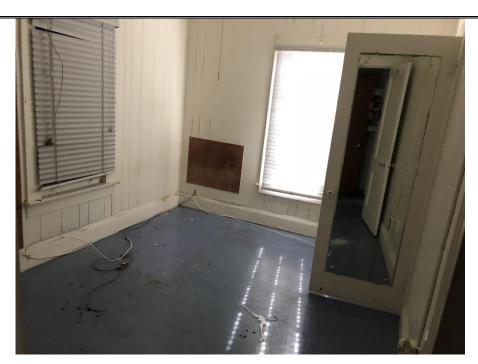


PHOTO # 14: VIEW OF GENERAL INTERIOR CONDITIONS.



# ASBESTOS SURVEY AND ASSESSMENT-FORM 1

Sampling Location: <u>530 S. Eucalyptus Street, Sebring, Florida</u>

Date of Survey: <u>Thursday, November 9, 2017</u>

Consultant: American Compliance Technologies, Inc. Client: Highlands County BOCC

Sample No.	Material Description	HA no.	Area Description	Friable Y/N	Asbestos Type & %	G/F/P	Damage Potential H/M/L	Hazard Assessment	Response Priority	Area Square Feet
1-1	Grey Cove Base/Mastic	1	Interior Walls	N	NAD	NA	NA	0	8	NA
2-1,2	12"x12" Floor Tile/Mastic	2	Interior Floor	N	NAD	NA	NA	0	8	NA
3-1	Rolled Vinyl Flooring	3	Bathroom	N	NAD	NA	NA	0	8	NA
4-1	Drywall	4	Interior Walls	Υ	NAD	NA	NA	0	8	NA
5-1	Joint Compound	5	Interior Walls	Y	NAD	NA	NA	0	8	NA
6-1	Plaster Skim Coat	6	Interior Walls	Y	NAD	NA	NA	0	8	NA
7-1	Plaster Base Coat	7	Interior Walls	Y	NAD	NA	NA	0	8	NA
8-1	Stucco Surfacing	8	Exterior Walls	N	NAD	NA	NA	0	8	NA
9-1	Window Caulk	9	Exterior Window	N	NAD	NA	NA	0	8	NA
10-1	Roof Material	10	Roof	N	NAD	NA	NA	0	8	NA

COMMENTS/NOTES:

G-Good HA- Homogenous Area Y-Yes F-Fair N-No P-Poor

H-High M-Medium L-Low

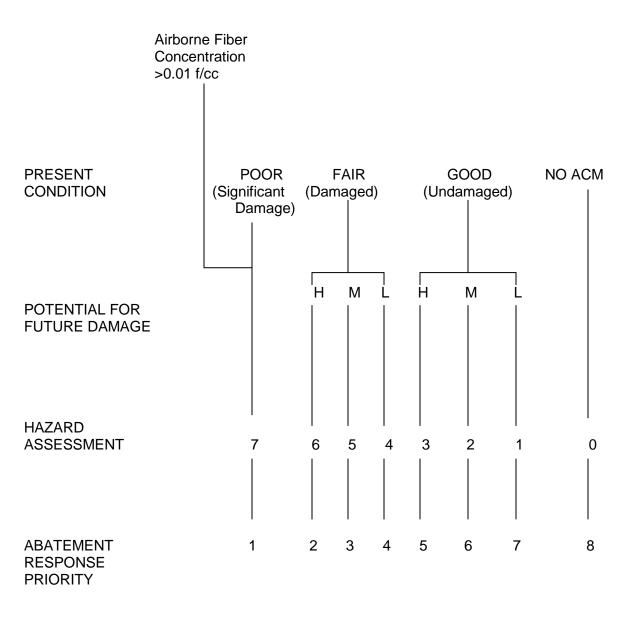
SF-Square Feet LF-Lineal Feet UNK-Unknown

NAD-No Asbestos Detected



## ASBESTOS HAZARD ASSESSMENT DECISION TREE

# **MATERIAL**





# **ASBESTOS SURVEY REPORT-TABLE 2**

## **PERSONNEL SUMMARY**

Facility Address: 530 S. Eucalyptus Street

Sebring, Florida

**Date of Survey:** Thursday, November 9, 2017

Name and Address Task Performed License or Certificate

Eric Jonsson Asbestos Consultant AX-83

American Compliance Tech, Inc. Asbestos Business ZA-334

1875 West Main Street Bartow, FL 33830

CEI Labs Bulk Sample Analysis NVLAP 101768-0

730 SE Maynard Road Cary, NC 27511



November 15, 2017

ACT, Inc 1875 W. Main Street Bartow, FL 33830

CLIENT PROJECT: HCBCC; 18863 CEI LAB CODE: A17-16996

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on November 14, 2017. 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. If you have any questions, please feel free to call our office at 919-481-1413.

Kind Regards,

Tianbao Bai, Ph.D., CIH Laboratory Director





# ASBESTOS ANALYTICAL REPORT By: Polarized Light Microscopy

# **Prepared for**

# ACT, Inc

CLIENT PROJECT: HCBCC; 18863

CEI LAB CODE: A17-16996

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

REPORT DATE: 11/15/17

TOTAL SAMPLES ANALYZED: 11

# SAMPLES > 1% ASBESTOS:

TEL: 866-481-1412

www.ceilabs.com



# **Asbestos Report Summary**

By: POLARIZING LIGHT MICROSCOPY

**PROJECT:** HCBCC; 18863 **CEI LAB CODE:** A17-16996

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
1-1		A2545506A	Gray	Covebase	None Detected
		A2545506B	Yellow	Mastic	None Detected
2-1		A2545507A	Blue	Floor Tile	None Detected
		A2545507B	Yellow	Mastic	None Detected
2-2		A2545508A	Blue	Floor Tile	None Detected
		A2545508B	Yellow	Mastic	None Detected
3-1		A2545509	Beige	Rolled Vinyl Flooring	None Detected
4-1		A2545510	White	Drywall	None Detected
5-1		A2545511	White	Joint Compound	None Detected
6-1		A2545512	White	Plaster Skim Coat	None Detected
7-1		A2545513	Tan	Plaster Base Coat	None Detected
8-1		A2545514	Green,White	Stucco Surfacing	None Detected
9-1		A2545515	Green,Tan	Window Caulking	None Detected
10-1		A2545516	Black,White	Roof Material	None Detected



# **ASBESTOS BULK ANALYSIS**

By: POLARIZING LIGHT MICROSCOPY

**CEI Lab Code:** A17-16996

Client: ACT, Inc

1875 W. Main Street

Bartow, FL 33830

Date Received: 11-14-17

Date Analyzed: 11-14-17

Date Reported: 11-15-17

Project: HCBCC; 18863

# ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NO	N-ASBESTOS	ASBESTOS			
Lab ID	Description	Attributes	Fibr	ous	Non-F	ibrous	%	
<b>1-1</b> A2545506A	Covebase	Homogeneous Gray Non-fibrous Tightly Bound		100%		Vinyl	None Detected	
A2545506B	Mastic	Homogeneous Yellow Non-fibrous Bound			100%	Mastic	None Detected	
<b>2-1</b> A2545507A	Floor Tile	Homogeneous Blue Non-fibrous Tightly Bound			70% 20% 10%	Vinyl Calc Carb Binder	None Detected	
A2545507B	Mastic	Homogeneous Yellow Non-fibrous Bound	<1%	Cellulose	100%	Mastic	None Detected	
<b>2-2</b> A2545508A	Floor Tile	Homogeneous Blue Non-fibrous Tightly Bound			70% 20% 10%	Vinyl Calc Carb Binder	None Detected	
A2545508B	Mastic	Homogeneous Yellow Non-fibrous Bound	<1%	Cellulose	100%	Mastic	None Detected	
<b>3-1</b> A2545509	Rolled Vinyl Flooring	Heterogeneous Beige Fibrous Bound	30%	Cellulose	50% 20%	Vinyl Binder	None Detected	



# **ASBESTOS BULK ANALYSIS**

By: POLARIZING LIGHT MICROSCOPY

**CEI Lab Code:** A17-16996

Client: ACT, Inc

1875 W. Main Street

Bartow, FL 33830

Date Received: 11-14-17

Date Reported: 11-15-17

Project: HCBCC; 18863

# ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab NON-ASBESTOS COMPONENTS					ASBESTOS	
Lab ID	Description	Attributes	Fibr	ous	Non-l	Fibrous	%	
<b>4-1</b> A2545510	Drywall	Heterogeneous White Fibrous Bound	5%	Cellulose	85% 10%	Gypsum Binder	None Detected	
<b>5-1</b> A2545511	Joint Compound	Heterogeneous White Fibrous Bound	10%	Cellulose	10% 70% 10%	Paint Calc Carb Silicates	None Detected	
<b>6-1</b> A2545512	Plaster Skim Coat	Heterogeneous White Non-fibrous Bound			10% 70% 20%	Paint Silicates Calc Carb	None Detected	
<b>7-1</b> A2545513	Plaster Base Coat	Heterogeneous Tan Fibrous Bound	2%	Hair	70% 28%	Silicates Binder	None Detected	
<b>8-1</b> A2545514	Stucco Surfacing	Heterogeneous Green,White Non-fibrous Loosely Bound			40% 40% 20%	Paint Calc Carb Binder	None Detected	
<b>9-1</b> A2545515	Window Caulking	Heterogeneous Green,Tan Non-fibrous Bound			10% 90%	Paint Binder	None Detected	
<b>10-1</b> A2545516	Roof Material	Heterogeneous Black,White Fibrous Bound	40%	Fiberglass	40% 20%	Tar Gravel	None Detected	



**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.

This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by CEI Labs, Inc. CEI Labs 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. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

**ANALYST** 

Adriana de la Nuez

APPROVED BY:

Tianbao Bai, Ph.D., CIH Laboratory Director

NVLAP LAB CODE 101768-0



ASBESTOS A 2545506 CHAIN OF CUSTODYA2545516

LABS				LAB USE ONLY:						
730 SE Maynard Road, Cary, NC 27511				CEI Lab Code:						
Tel: 866-481-1412; Fax: 919-481-1442				CEI Lab I.D. Range:						
COMPANY INFORMATION		PROJECT INFORMATION								
CEI CLIENT #:		Job Contact: Eric Jonsson								
Company: A-C-T			Email / Tel: 863-559-0188							
Address: 1875 W. M		Project Na	me: HC	BCC						
Barton, F			Project ID#	#: 188	and the same					
Email: Cjonssona				2857						
Tel: 863-559-0188	Fax:		STATE SA	MPLES CO	DLLECTED	IN: FL				
	- TATIS NOT 144 BVE	D OTAND								
	TAT IS NOT MARKE	STAND	ARD 3 DA		OUND TIME					
ASBESTOS	METHOD	4 HR	8 HR	24 HR	2 DAY		EDAY			
		4 HK	OHK	24 FIK	ZDAT	3 DAY	5 DAY			
PLM BULK	EPA 600									
PLM POINT COUNT (400)	EPA 600									
PLM POINT COUNT (1000)	EPA 600									
PLM GRAV w POINT COUNT	EPA 600									
PLM BULK PCM AIR	CARB 435									
TEM AIR	NIOSH 7400 EPA AHERA									
TEM AIR	NIOSH 7402									
TEM AIR	ISO 10312									
TEM AIR	ASTM 6281-09									
TEM BULK	CHATFIELD									
TEM DUST WIPE	ASTM D6480-05 (2010)									
TEM DUST MICROVAC	ASTM D5755-09 (2014)									
TEM SOIL	ASTM D7521-13				F					
TEM VERMICULITE	CINCINNATI METHOD									
OTHER:										
DEMADKS / SDECIAL IN	STDI ICTIONS:									
REMARKS/SPECIAL INSTRUCTIONS: 530 S. Encalyptus 11-9-17					✓ A	ccept Sample	es			
					□ R	eject Sample	s			
Relinquished By: Date/Time			Receiv	ed By:	Date/Time					

Samples will be disposed of 30 days after analysis

16:00

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1417

9:30

# ASBESTOS SAMPLING FORM



COMPANY CONTACT INFORMATION	
Company: A-C-T	Job Contact: Eric Jonsson
Project Name: #CBCC	
Project ID #: 18863	Tel: 863-559-0188

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	Т	EST
1-1	Cove Base/Mastic		PLM 📉	TEM
2-1	Floor Tile/Mastic		PLM 💢	TEM
2-2	Flow T-la / 11 his		PLM 🔀	TEM
3-1	Rolled Viny Flooring		PLM 📉	TEM
4-1	1170 40011		PLM 💢	TEM
5-1	Joint Compound		PLM 🔀	TEM
6-1	Plaster Skim Cont		PLM 🔀	TEM
7-1	Plaster Base Coat		PLM 💢	TEM
8-1	Stucco Surfacing		PLM 💢	TEM
9-1	window Caulk	- Company Profession	PLM 🔀	TEM
10-1	Roof Material		PLM X	TEM
			PLM	TEM
			PLM	TEM
			PLM	TEM
		1 "	PLM	TEM
			PLM	TEM

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Version: CCOC.01.17.2/2.LD



# STATE OF FLORIDA DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION

ASBESTOS LICENSING UNIT 2601 BLAIR STONE ROAD TALLAHASSEE FL 32399-0783

(850) 487-1395

JONSSON, ERIC ANDREW AMERICAN COMPLIANCE TECHNOLOGIES, INC. 1875 WEST MAIN STREET BARTOW FL 33830

Congratulations! With this license you become one of the nearly one million Floridians licensed by the Department of Business and Professional Regulation. Our professionals and businesses range from architects to yacht brokers, from boxers to barbeque restaurants, and they keep Florida's economy strong.

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Our mission at the Department is: License Efficiently, Regulate Fairly. We constantly strive to serve you better so that you can serve your customers. Thank you for doing business in Florida, and congratulations on your new license!



# United States Department of Commerce National Institute of Standards and Technology



# Certificate of Accreditation to ISO/IEC 17025:2005

**NVLAP LAB CODE: 101768-0** 

CEI Labs, Inc.

Cary, NC

is accredited by the National Voluntary Laboratory Accreditation Program for specific services, listed on the Scope of Accreditation, for:

# **Asbestos Fiber Analysis**

This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.

This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).

2017-04-01 through 2018-03-31

Effective Dates



For the National Voluntary Laboratory Accreditation Program



## SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

CEI Labs, Inc.

730 SE Maynard Road Cary, NC 27511 Dr. Tianbao Bai

Phone: 919-481-1413 Fax: 919-481-1442

Email: bai@ceilabs.com http://www.ceilabs.com

## ASBESTOS FIBER ANALYSIS

## **NVLAP LAB CODE 101768-0**

# **Bulk Asbestos Analysis**

<u>Code</u> <u>Description</u>

18/A01 EPA -- Appendix E to Subpart E of Part 763 -- Interim Method of the Determination of Asbestos in

**Bulk Insulation Samples** 

18/A03 EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

# Airborne Asbestos Analysis

<u>Code</u> <u>Description</u>

18/A02 U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and

Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in

40 CFR, Part 763, Subpart E, Appendix A.

For the National Voluntary Laboratory Accreditation Program