

ADDENDUM NUMBER 1 TO THE REQUEST FOR PROPOSAL (RFP)

To all general contract bidders of record on the Request For Proposal titled:

Relocation of Building Debris / Asbestos Containing Materials
Associated with Structurally Compromised Buildings
Former True Temper Site (SMS #2024-5394)
575 Concord Avenue, Saint Johnsbury, Vermont
ISSUE DATE: February 20, 2025
BID DEADLINE: March 19, 2025 at 5:00 pm

PREPARED BY: Montrose Environmental Solutions, Inc., as agent for The Town of St. Johnsbury

A. Bidders are hereby notified that they shall account for any necessary modifications in their estimates as a result of this Addendum. It is understood that each bidder's proposal is submitted with full knowledge of all modifications and supplemental information contained herein.

B. This Addendum shall be considered part of the bid documents for the above-mentioned project and shall be incorporated therein. If the following supplementary information differs from that of the original bid documents, this Addendum shall take priority and govern.

The bid documents are modified as follows:

Modification to Section – Project Description

Delete the sentence “This procedure if not intended to be an asbestos abatement activity”. The specified work shall be considered as asbestos abatement project in accordance with the Vermont Regulations for Asbestos Control (VRAC)

Modifications to Section - Scope of Work

1). Entire Scope of Work Section

This entire section shall be the document submitted to the Vermont Department of Health as described in Item 3 of this section (request for alternative work practices). CPAI will provide a clean copy of this document to the selected Contractor in support of their submittal.

2). Item 2

In the first sentence, delete the phrase, "eight (8) unique locations" and replace it with the phrase, "up to six (6) unique locations". See revised **Figure 1** (attached).

Following the first sentence, add the following sentences, “The ACM / Debris Clearing shall be conducted by the contractor in two phases: Base Scope and Optional Scope, bid Item #2 and bid

Item #3, respectively. Due to the compromised building structure, confirmation of flooring material and confirmation of the potential presence of a basement within the “Optional Scope Area” shown on **Figure 1**, is unable to be completed. Previous on-Site observation confirmed the presence of a concrete slab for the eastern four (4) locations “Base Scope Area”.

Add the following sentences to item 2, “The Base Scope shall be completed by the Contractor at the direction of Montrose to clear / relocate the eastern four (4) locations and to clear vegetation / debris at two locations to 10 feet within the building footprint (i.e. excavator is positioned outside of building) to allow for inspection of flooring material within the general area of the two (2) central locations. Montrose or CPAI shall conduct the inspection of flooring material. If a concrete slab is not found or compromised flooring is observed indicating the area is over a basement, the Optional Scope will not be initiated. If a concrete slab is observed, the Optional Scope shall be conducted by the Contractor at the direction of Montrose. The concrete slab shall be completely cored (2-inch minimal diameter) for inspection by Montrose or CPAI to observe the potential presence of a basement. If no basement is observed, the Optional Scope Area will be cleared for access by a drill rig as detailed above.”

3). Items 3 and 10

Delete all references to "Montrose". Replace with "CPAI".

4). Items 5 and 6

Delete all references to the "the Contractor". Replace with "CPAI".

5). Item 11

In the last sentence, delete the phrase "the Contractor to Montrose" and replace it with, "CPAI to Contractor, Montrose and VDH".

6). Item 12

Delete the entire first sentence and replace with the following sentence.

The Contractor shall meticulously relocate building materials/debris to create a clear path, approximately twelve (12) feet wide, for a drill rig to access the designated drill point.

7). Items 13 and 14

Delete all references to "the Owner's Representative". Replace with "CPAI".

8). Item 14

Add the following sentence to Item 14.

All used cleaning materials and all used personal protective equipment generated during the project shall be disposed by the Contractor as asbestos waste in accordance with applicable regulations.

Modifications to Section - Bid Form Table

Replace Item #2 with Base Scope and replace Item #3 with Optional Scope. See revised Bid Form (attached).

CPAI will be performing the original Bid Form Table Item #3 activities at Owner's Expense.

Please note that Item #1 will remain. According to VDH, the selected Contractor must be the entity that requests alternative work practices. CPAI will provide supporting documents to assist the selected Contractor with this process. This section shall also include all costs associated with submitting required notifications and obtaining a VDH project permit.

Addition to the RFP

The CPAI Asbestos Inspection Report is attached and shall be considered part of the Request For Proposal.

CPAI will assist the selected Contractor with estimation of quantities involved in this project.

Please acknowledge receipt of Addendum #1 on the revised Bid Form (attached).

Enclosures:

Revised Bid Form

Revised Figure 1 – Site Plan and Drilling Locations

CPAI Asbestos Inspection Report

BID FORM

PROJECT IDENTIFICATION: FORMER TRUE TEMPER SITE (SMS #2024-5394)
Relocation of Building Debris / Asbestos Containing Materials
575 Concord Avenue
Saint Johnsbury, Vermont 05819

THIS BID IS SUBMITTED TO: Ryan Malia
Staff Geologist
Montrose Environmental Solutions, Inc.
100 S. Clinton Avenue, Suite 2330
Rochester, New York 14604

- 1) The undersigned Bidder proposes and agrees, if this Bid is accepted, to perform and furnish all Work as specified or indicated in the RFP for the Contract Price.
- 2) Bidder accepts all of the terms and conditions of the RFP.
- 3) In submitting this Bid, Bidder represents that:
 - A. Bidder has examined the RFP issued during the Bidding Process.
 - B. Bidder has familiarized itself with the nature and extent of the RFP, Work, Site, locality, and all local conditions and laws and regulations that in any manner may affect cost, progress, performance or furnishing of the Work and has visited the Site as part of the pre-bid meeting.
 - C. Bidder acknowledges that reports and drawings of subsurface conditions and drawings of physical conditions are available for review and copying at a location designated by Montrose.
 - D. Bidder has obtained and carefully studied (or assumes responsibility for obtaining and carefully studying) all such examinations, investigations, explorations, test and studies which pertain to the physical conditions at the Site or otherwise may affect the cost, progress, performance or furnishing of the Work as Bidder considers necessary for the performance or furnishing of the Work at the Contract Price, in accordance with the other terms and conditions of the RFP.
 - E. Bidder has reviewed and checked all information and data shown or indicated in the RFP with respect to existing underground facilities at or contiguous to the Site, and surface or subsurface conditions, and assumes responsibility for the accurate location of said underground facilities. No additional examinations, investigations, explorations, tests, reports or similar information nor data in respect of said underground facilities, surface, or subsurface conditions are or will be required by Bidder in order to perform and furnish the Work at the Contract Price, in accordance with the other terms and conditions of the RFP.
 - F. Bidder has given Montrose written notice of all conflicts, errors or discrepancies that it has discovered in the RFP and the written resolution thereof by Montrose is acceptable to Bidder.
 - G. This Bid is genuine and not made in the interest of or on behalf of any undisclosed person, firm or corporation and is not submitted in conformity with any agreement or rules of any group, association, organization or corporation. Bidder has not directly or indirectly induced or solicited any other Bidder to submit a false or sham Bid. Bidder has not solicited or induced any person, firm or corporation to refrain from bidding, and Bidder has not sought by collusion to obtain for itself any advantage over any other Bidder or Montrose.
- 4) Contractor represents that it is engaged in the business of performing, among other things, building asbestos and lead based paint abatement, building demolition and decontamination, and property restoration. The Contractor further represents that the equipment provided by it and/or any subcontractors

to perform the work are suitable to perform such work and that all personnel are properly trained. Contractor further represents that the parties with which Contractor subcontracts to perform services related to this Contract shall be appropriately certified, permitted and/or licensed pursuant to applicable federal, state and local laws, ordinances and regulations.

- 5) Contractor acknowledges that it is aware of and understands the nature of the substances that may be involved with the Work, and the risks that may be presented to persons, property and the environment.
- 6) Contractor represents and warrants that all work performed by the Contractor under this Bid shall be in accordance with the requirements, standards, and specifications applicable to the work as set forth or referred to in the RFP.
- 7) Contractor further represents that in performing work hereunder which requires professional engineering judgment, Contractor shall apply a level of effort in performing the Work consistent with applicable professional engineering standards as existing in the United States and the industry at the time the Work is performed and shall comply with applicable federal, state and local statutes, ordinances and regulations.
- 8) Contractor represents that it shall, at all times, cause its employees, subcontractors and agents to comply with all applicable safety and health regulations, codes, and standards. Contractor further represents that it shall take all reasonable precautions for the safety of, and shall provide protection to prevent damage, injury or loss to all persons, property, materials and equipment involved in the Work herein. Contractor further represents that it shall maintain all reasonable safeguards for safety and protection, including temporary fences, signs and warnings against hazards, and promulgating safety regulations associated directly with Contractor's work.
- 9) Contractor shall retain as confidential all information and data designated as confidential by Montrose, and Contractor shall not disclose such information to any third party, provided that nothing herein shall prevent any party from disclosing and/or using said information or data (i) when the information or data without a confidentiality obligation are actually known to the receiving party before being obtained or derived from the transmitting party; (ii) when the information or data are generally available to the public without the fault of the Contractor at any time before or after it is acquired from the transmitting party; (iii) where the information or data are obtained or acquired in good faith at any time by the Contractor from a third party who has the same good faith and who is not under any obligation to the transmitting party in respect thereof; or (iv) where a written release is obtained by the receiving party from the transmitting party. In the event that Contractor is required by subpoena, court order, administrative order or otherwise, to disclose any confidential information, Contractor shall give immediate written notice to Montrose. Upon receipt of same, Montrose expressly reserves the right to interpose all objections it may have to the disclosure of the information. The foregoing obligation shall survive the termination or expiration of this Contract and shall continue in force and effect until a written release is given by Montrose.
- 10) Contractor shall not use any such reports, documents, manifests, permits, certificates, or information for any purpose unrelated to the work performed under the Agreement without the prior written consent of Montrose.
- 11) The terms used in this Bid which are defined in the RFP have the meanings assigned to them in the RFP.
- 12) Contractor shall obtain all necessary licenses, permissions, or approvals and shall pay for all royalties or other charges related to the use of any patent-protected or proprietary materials, equipment, or techniques at the Site. Montrose shall not be responsible for any charges or royalties lodged by a patent holder or licensor other than those charges anticipated by the Contractor and built into the Contract amount nor any legal action or related expenses resulting from the Contractor's use at the Site.

BID FORM NEXT PAGE

BID FORM TABLE

Item No.	Description	Location	Action	Unit	Approximate Quantity	Unit Cost (\$)	Total Bid
1	Approvals	N/A	Apply for approval of alternative work practices in accordance with VRAC	Lump Sum	1		
2	<u>Base Scope</u> - ACM / Debris Clearing	Field Locate	Relocate building materials/debris to clear a pathway for a drill rig to access four (4) unique locations. Relocate building materials/debris and vegetation at two locations 10 feet within edge of building footprint to access the optional scope area for observation of flooring material	Lump Sum	1		
3	<u>Optional Scope</u> - Concrete Coring / ACM / Debris Clearing	Field Locate	Core concrete slab if observed in optional scope area at the two locations. If no basement is observed, proceed to relocate building materials/debris to clear a pathway for a drill rig to access two (2) unique locations	Lump Sum	1		
Total Bid Amount =							

Receipt of Addendum #1

Signature

(If Bidder is an Individual)

Signature of Witness

Signature of Individual

Trading and doing business as:

Name of Business

Address of Business

(If Bidder is a Partnership)

Name of Partnership

Address of Partnership

Signature of Witness

Signature of Partner

Signature of Witness

Signature of Partner

Signature of Witness

Signature of Partner

Attest:

(If Bidder is a Corporation)

Name of Corporation

Signature of Secretary
Assistant Secretary

Address of Principal Office

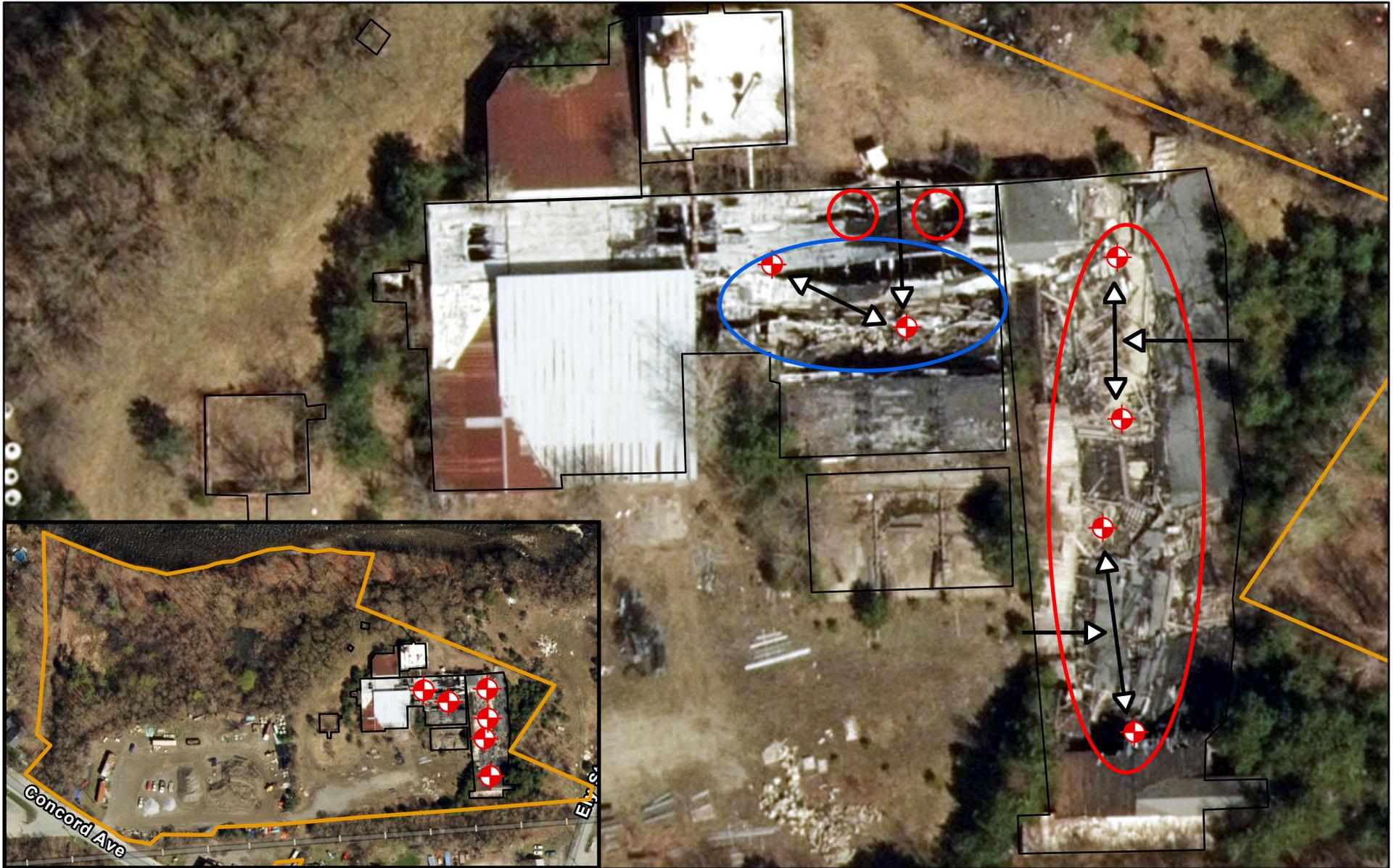
(Corporate Seal)

State of Incorporation

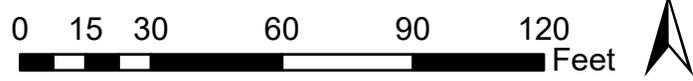
Signature of President
or Vice President

Type or print name below each signature

State here the names and address of all partners, if a partnership, or of three principal officers, if a corporation



-  Drilling Locations
-  Base Scope Area (Bid Item #2)
-  Site Boundary
-  Optional Scope Area (Bid Item #3)
-  On-site Structures
-  Paths to be Cleared



CREATION DATE: MARCH 13, 2025	PROJECT NO: 224534	FIGURE 1 SITE PLAN AND DRILLING LOCATIONS
	DRAWN BY: RM APPRVD BY: KI CHECK'D BY: KI REVISION: 0	
FORMER TRUE TEMPER SITE 575 CONCORD AVENUE, ST. JOHNSBURY VT		©2025 Montrose Environmental. All rights reserved



June 17, 2024

Ms. Andrea Pedersen
Montrose Environmental
5120 Northshore Drive
North Little Rock, AR 72118

Re: Inspection for Asbestos Containing Materials
Former True Temper Facility, 575 Concord Avenue, St. Johnsbury, Vermont
CPAI Project #16152

Dear Ms. Pederson:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on May 14 & 15, 2024 on/within buildings/structures located at the Former True Temper Factory site at 575 Concord Avenue, St. Johnsbury, Vermont. Inspection activities were performed to evaluate suspect asbestos containing materials prior to planned site cleanup activities. Please note that a large portion of the brick section of the Main Building (see attached site plan) was inaccessible due to the presence of collapsed building materials and concerns over the structural integrity of this portion of the building. Additional inspection activities will need to be performed in this area prior to demolition of the structure.

On the dates referenced above, CPAI collected seventy-nine (79) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service of which sixty-six (66) were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods. Thirteen (13) samples were not analyzed in accordance with our "Stop Positive" protocol. One (1) additional layer within one of the bulk samples submitted by CPAI was detected by the analytical service and analyzed by PLM.

Drawings depicting existing conditions/CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), the Inventory of Asbestos Containing Materials (Table 2), analytical service bulk sample analysis reports, and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Kyle B. Austin". The signature is fluid and cursive, written over a light blue horizontal line.

Kyle B. Austin
Environmental Associate



LEGEND

Site Plan:

575 Concord Avenue
St. Johnsbury, VT

May 14 & 15, 2024



NOTES

575 Concord Avenue
St. Johnsbury, VT

1: 690

June 13, 2024



0.02 0 0.01 0.02 Miles

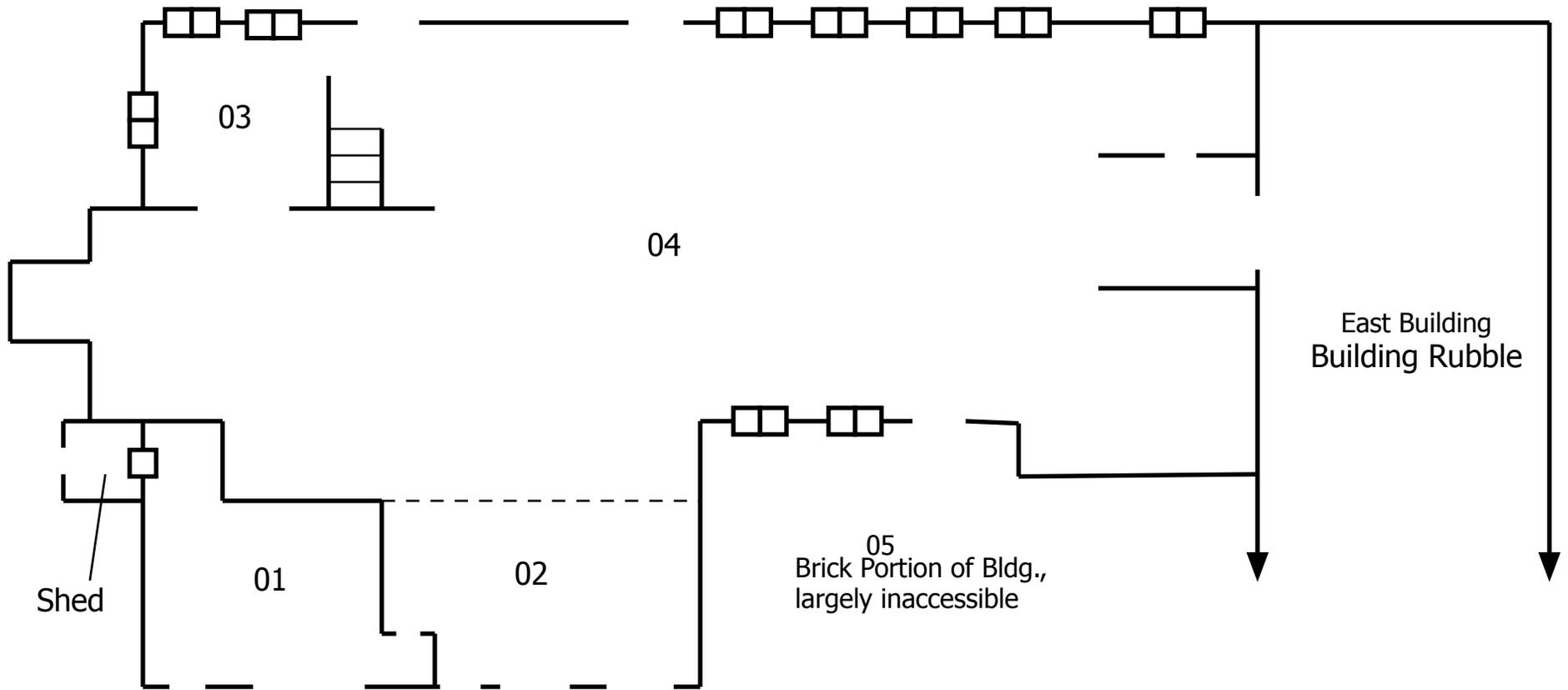
WGS_1984_Web_Mercator_Auxiliary_Sphere
© Vermont Center For Geographic Information

1" = 58 Ft. 1cm = 7 Meters
THIS MAP IS NOT TO BE USED FOR NAVIGATION

DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. VCGI and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.

Main Building

Main Floor



Clay Point Associates, Inc.
Project #16152
May 14, 2024

Industrial Structure
575 Concord Avenue
St. Johnsbury, Vermont

Asbestos Inspection
Not to Scale
Drawn By: Christer Herrmans



**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
Main Building
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Pressed Board Material	05142416152-39	05/14/24	2451162-004	CPAI Area #03, on north wall, 9 ft. 2 in. from west wall, 3 ft. from floor.	NAD
	05142416152-38	05/14/24	2451162-005	CPAI Area #03, on north wall, 3 ft. 11 in. from west wall, 5 ft. 2 in. from floor.	NAD
Composition Board Panels	05142416152-01	05/14/24	2451162-006	CPAI Area #03, loose on floor at southeast section.	NAD
	05142416152-35	05/14/24	2451162-007	CPAI Area #03, loose on floor at southeast section.	NAD
Mortar, assoc. w/ concrete block	05142416152-18	05/14/24	2451162-012	CPAI Area #05, on west wall, 4 ft. from north wall, 5 ft. 2 in. from floor.	3% Chrys.
	05142416152-02	05/14/24	2451162-011	CPAI Area #05, on east wall, 7 ft. 4 in. from south wall, 2 ft. 10 in. from floor.	NAD
Concrete	05142416152-32	05/14/24	2451162-001	CPAI Area #01, west foundation wall, 17 ft. 8 in. from south wall, 11 in. from floor.	NAD
	05142416152-40	05/14/24	2451162-002	Basement, west section, pier (column), at west side of entrance to Basement.	NAD
	05142416152-37	05/14/24	2451162-003	CPAI Area #02, from slab, 15 ft. 2 in. from south wall, 4 ft. 8 in. from east wall.	NAD

(continued)

**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
Main Building
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Window Glazing, assoc. w/ 6 over 6 pane windows	05142416152-06	05/14/24	2451162-016	Exterior, West Elevation, 2 nd window from north, lower sash.	2% Chrys.
	05142416152-36	05/14/24	2451162-015	Exterior, North Elevation, 4 th window from west, bottom sash.	NAD
	05142416152-33	05/14/24	2451162-017	Exterior, South Elevation of CPAI Area #04, west window, lower sash.	NAD
Built-Up Roofing, w/ Silver Coating	05142416152-34	05/14/24	2451162-008	CPAI Area #04, loose on floor at south central section.	35% Chrys.
	05142416152-19	05/14/24	2451162-009	CPAI Area #04, north central section.	n/a
	05142416152-31	05/14/24	2451162-010	CPAI Area #04, Hanging from roof at south central section.	45% Chrys.
	05142416152-25	05/14/24	2451162-013	Exterior, West Elevation, on roof over shed, southwest corner.	5% Chrys.
	05142416152-30	05/14/24	2451162-014	Exterior, on roof over storage room at west elevation of building.	n/a
Built-Up Roofing	05142416152-41	05/14/24	2451162-018	Exterior, roof over brick portion of building, southeast section.	45% Chrys.
	05142416152-52	05/14/24	2451162-019	Exterior, roof over brick portion of building, south central section.	n/a
Asbestos/Cement Pipe	05142416152-51	05/14/24	2451162-020	Exterior, roof over brick portion of bldg., exhaust stack protruding through roof, south central section.	35% Chrys. 8% Croc.

Table 1
Bulk Sample Analysis Inventory

Building/Addition: Former True Temper Factory
Main Building
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Asbestos/ Cement Pipe (cont.)	05142416152-54	05/14/24	2451162 -021	Exterior, roof over brick portion of bldg., exhaust stack protruding through roof, south central section.	n/a
Flashing Cement, grey	05142416152-55	05/14/24	2451162 -022	Exterior, roof over brick portion of building, on Asbestos/Cement Pipe exhaust stack, south central section.	8% Chrys.
	05142416152-56	05/14/24	2451162 -023	Exterior, roof over brick portion of building, on Asbestos/Cement Pipe exhaust stack, south central section.	n/a

PLM = Polarized Light Microscopy
 NAD = No Asbestos Detected
 Chrys. = Chrysotile Asbestos
 Croc. = Crocidolite Asbestos
 n/a = Sample not analyzed (stop at first positive result in group)



**Table 2
Inventory of Asbestos Containing Materials**

Building/Addition:		Former True Temper Factory Main Building 575 Concord Avenue St. Johnsbury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
Brick Portion of Building	Mortar, assoc. with concrete block	Not Quantified	Confirmed to be present in CPAI Area #05. A large portion of this building is inaccessible due to the presence of collapsed building materials and concerns over the structural integrity of this portion of the building.
Interior/ Exterior	Asbestos/Cement Pipe	16 lin. ft.	Exhaust stacks protruding up through concrete deck and built-up roofing material. Assumed to be present interior spaces below that were inaccessible.
Exterior	Window Glazing	Not Quantified	Confirmed positive on window at north elevation, two (2) samples from similar windows at south elevation were negative. Additional sampling needed.
	Flashing Cement, grey	16 sq. ft.	On sixteen (16) Asbestos/Cement pipes protruding through roof from inside the building.
	Built-Up Roofing, w/ Silver Coating	8,458 sq. ft.	On designated roof surfaces over Main Building. Large amounts of debris also present at the interior as many areas of the roof have collapsed.
	Built-Up Roofing	1,872 sq. ft.	On flat roof over inaccessible brick portion of the building.



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16152
Laboratory Batch #: 2451162
Date Samples Received: 05/16/2024
Date Samples Analyzed: 05/22/2024
Date of Final Report: 05/22/2024

SAMPLE IDENTIFICATION:

Twenty Three (23) samples from CPAI Proj.#16152-Batch #1 project were submitted by Client on 05/16/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter (<0.25µm) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2451162
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/22/2024
REPORT DATE: 05/22/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451162-001 05142416152-32	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	1% 99%
2451162-002 05142416152-40	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	1% 99%
2451162-003 05142416152-37	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	1% 99%
2451162-004 05142416152-39	Bulk Material, Brown	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	99% 1%
2451162-005 05142416152-38	Bulk Material, Brown	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	99% 1%
2451162-006 05142416152-01	Bulk Material, Brown/ White	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	95% 5%
2451162-007 05142416152-35	Bulk Material, Brown/ White	LAYER 1 100%	None Detected		Cellulose Fiber Non-Fibrous Material	95% 5%
2451162-008 05142416152-34	Bulk Material, Black	LAYER 1 100%	Chrysotile	35%	Cellulose Fiber Non-Fibrous Material	15% 50%
2451162-009 05142416152-19	Bulk Material, Black Note: Positive Stop	LAYER 1 100%				
2451162-010 05142416152-31	Bulk Material, Black/Silver	LAYER 1 100%	Chrysotile	45%	Cellulose Fiber Non-Fibrous Material	10% 45%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #1

ORDER #: 2451162
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/22/2024
REPORT DATE: 05/22/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451162-011 05142416152-02	Bulk Material, Gray/Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451162-012 05142416152-18	Bulk Material, Silver/Black	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2451162-013 05142416152-25	Bulk Material, Black/Silver	LAYER 1 100%	Chrysotile	5%	Cellulose Fiber Binder/Filler	65% 30%
2451162-014 05142416152-30	Bulk Material, Black/Silver Note: Positive Stop	LAYER 1 100%				
2451162-015 05142416152-36	Bulk Material, Green/Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451162-016 05142416152-06	Bulk Material, Green/Beige/White	LAYER 1 100%	Chrysotile	2%	Cellulose Fiber Binder/Filler	1% 97%
2451162-017 05142416152-33	Bulk Material, Green/Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451162-018 05142416152-41	Bulk Material, Black	LAYER 1 100%	Chrysotile	45%	Cellulose Fiber Binder/Filler	15% 40%
2451162-019 05142416152-52	Bulk Material, Black Note: Positive Stop	LAYER 1 100%				
2451162-020 05142416152-51	Bulk Material, Gray/White	LAYER 1 100%	Chrysotile Crocidolite	35% 8%	Cellulose Fiber Binder/Filler	1% 56%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

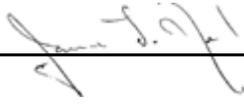
PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #1

ORDER #: 2451162
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/22/2024
REPORT DATE: 05/22/2024
ANALYST: Jamie Noel

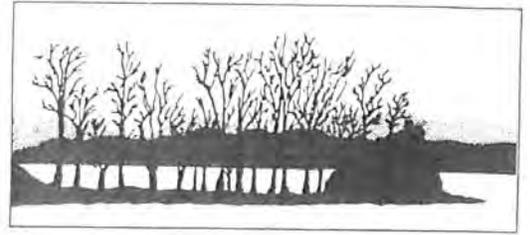
REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451162-021 05142416152-54	Bulk Material, Gray/White Note: Positive Stop	LAYER 1 100%				
2451162-022 05142416152-55	Bulk Material, Black/Gray	LAYER 1 100%	Chrysotile	8%	Cellulose Fiber Binder/Filler	5% 87%
2451162-023 05142416152-56	Bulk Material, Black/Gray Note: Positive Stop	LAYER 1 100%				

Analyst Signatory: 
 Jamie Noel



2451162



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152 - BAYZ #1

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
05142416152- 32	5/14/24	PLM	1	Analyze Each
- 40			2	Group until
- 37			3	1st positive
- 39			4	5-DAY TAT
- 38			4	
- 01			5	
- 35			5	
- 34			6	
- 19			6	
- 31			7	
- 02			8	
- 18			8	
- 25			9	
- 30			9	
- 36			10	

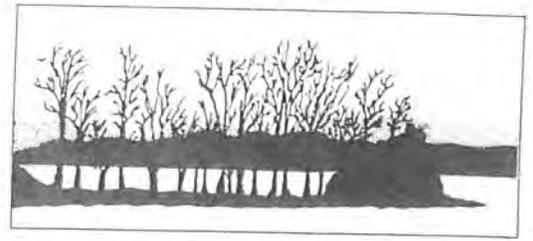
Chain of Custody Form Attached? Yes No

Consultant Signature: [Signature] Page No.: 1 of

61. Ciler 5/16/24 9:30

2451162

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152-03+24 #1

Analytical Service: OAC

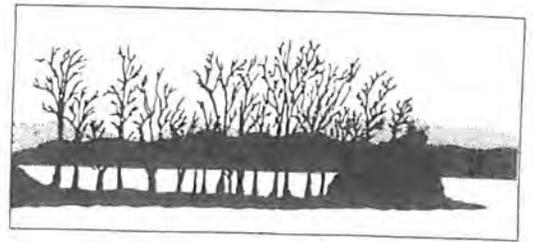
Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
05142716152 - 06	5/11/24	PLM	11	See page 1
-33			12	
-41			13	
-52			13	
-51			14	
-54			14	
-55			15	
-56			15	

Chain of Custody Form Attached? Yes No

Consultant Signature: [Signature] Page No.: 2 of 2

[Signature] 5/16/24 9:30

2451162



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj. #:

16152

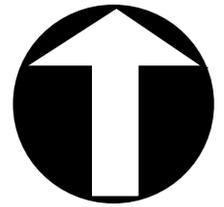
Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
X			X		4 BITUMENS
					16152-01 → 75
					Collected 5/14 + 5/15,
					2021

	Date	Time	Name	Signature
Transfer #1	5/15/24	4:00 pm	USA	
to:		TO GAC	VIA FedEx	EX
Transfer #2				
to:				
Transfer #3				
to:				

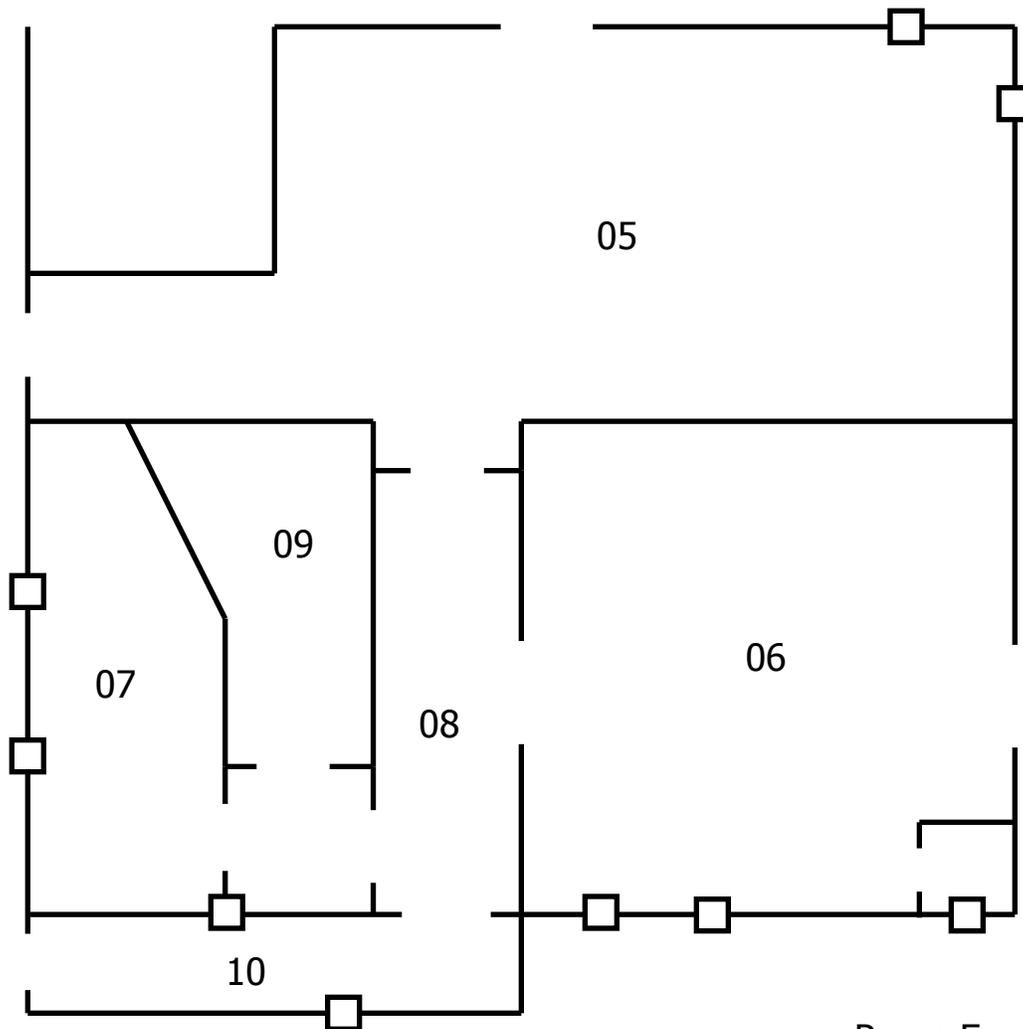
Celan 5/16/24 9:30

Boiler House

Main Floor



Project North



- Room Equivalent:
- 05 = Boiler Room
 - 06 = Storage
 - 07 = Bathroom
 - 08 = Hallway
 - 09 = Bathroom
 - 10 = Entry

Clay Point Associates, Inc.
Project #16152
May 14, 2024

Boiler House
575 Concord Ave.
St. Johnsbury, Vermont

Asbestos Inspection
Not to Scale
Drawn By: Christer Herrmans



**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
Boiler House
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Block Type Insulation, assoc. w/ Boiler Breeching	05142416152-28	05/14/24	2451163-004	CPAI Area #05, loose on floor north of Boiler.	NAD
	05142416152-24	05/14/24	2451163-005	CPAI Area #05, bottom of breeching, 8 ft. 10 in. from south wall, 11 ft. 3 in. from west wall.	NAD
	05142416152-23	05/14/24	2451163-006	CPAI Area #05, bottom of breeching, 1 ft. 9 in. from south wall, 19 ft. 4 in. from western-most wall.	NAD
Skim Coat Insulation, assoc. w/ Boiler Breeching	05142416152-29	05/14/24	2451163-001	CPAI Area #05, loose on floor north of Boiler.	NAD
	05142416152-27	05/14/24	2451163-002	CPAI Area #05, bottom of breeching, 9 ft. 1 in. from south wall, 11 ft. 3 in. from west wall.	NAD
	05142416152-26	05/14/24	2451163-003	CPAI Area #05, west side of breeching, 2 ft. from south wall, 7 ft. 1 in. from pedestal west of boiler.	NAD
Skim Coat Concrete assoc. w/ Boiler	05142416152-20	05/14/24	2451163-007	CPAI Area #05, top of Boiler, 15 ft. 3 in. from north wall, 19 ft. 11 in. from east wall.	NAD
	05142416152-16	05/14/24	2451163-008	CPAI Area #05, top of Boiler, 1 ft. 9 in. from south wall, 20 ft. from east wall.	NAD

(continued)

**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
Boiler House
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Refractory Cement	05142416152-13	05/14/24	2451163-011	CPAI Area #05, inside firebox, lower north access hatch.	NAD
	05142416152-22	05/14/24	2451163-012	CPAI Area #05, inside firebox, lower south access hatch.	NAD
High-Temp Paint, black	05142416152-11	05/14/24	2451163-013	CPAI Area #05, west end of Boiler, 15 ft. 1 in. from north wall, 3 ft. 4 in. from pedestal above firebox.	NAD
	05142416152-12	05/14/24	2451163-014	CPAI Area #05, west end of firebox, 20 ft. 9 in. from north wall, 4 ft. 1 in. from floor.	NAD
Window Glazing, assoc. w/ steel frame, 25 pane windows	05142416152-08	05/14/24	2451163-017	CPAI Area #06, west window at south wall, loose on sill.	5% Chrys.
	05142416152-10	05/14/24	2451163-018	CPAI Area #05, window at north wall, bottom, west pane.	n/a
Window Glazing, assoc. w/ 9 pane, fixed windows	05142416152-04	05/14/24	2451163-019	CPAI Area #08, window over door at south wall, lower west pane.	3% Chrys.
Window Glazing, assoc. w/ 6 pane, fixed windows	05142416152-14	05/14/24	2451163-020	Exterior, South Elevation, window at south wall of CPAI Area #10.	3% Chrys.
Mortar, assoc. w/ Boiler Brick	05142416152-21	05/14/24	2451163-009	CPAI Area #05, north side of boiler, 23 ft. 9 in. from east wall, 5 ft. from floor.	NAD
	05142416152-17	05/14/24	2451163-010	CPAI Area #05, west side of Boiler, 22 ft. 9 in. from north wall, 1 ft. 10 in. from floor.	NAD 2 layers

Table 1
Bulk Sample Analysis Inventory

Table 1					
Bulk Sample Analysis Inventory					
Building/Addition:			Former True Temper Factory Boiler House 575 Concord Avenue St. Johnsbury, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Mortar, assoc. w/ brick	05142416152-09	05/14/24	2451163-021	CPAI Area #06, on north wall, 3 ft. 2 in. from west wall, 2 ft. 8 in. from floor.	NAD
	05142416152-03	05/14/24	2451163-022	Exterior, East Elevation, north section.	NAD
Concrete	05142416152-07	05/14/24	2451163-015	CPAI Area #06, from slab, 9 ft. 5 in. from south wall, 12 ft. 11 in. from east wall.	NAD
	05142416152-05	05/14/24	2451163-016	Exterior, from foundation, north-east corner of building.	NAD
Built-Up Roofing, w/ Silver Roof Coating	05142416152-47	05/14/24	2451163-027	Exterior, Roof, northeast section.	5% Chrys.
	05142416152-42	05/14/24	2451163-029	Exterior, Roof, east parapet wall, north section.	5% Chrys.
	05142416152-45	05/14/24	2451163-028	Exterior, Roof, southwest section.	n/a
Roofing Tar	05142416152-49	05/14/24	2451163-025	Exterior, West Elevation, on metal flashing at junction w/ metal roof to the west, north section.	NAD
	05142416152-50	05/14/24	2451163-026	Exterior, on metal roof west of building, at junction of metal flashing and metal roof, northeast section.	NAD

**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
Boiler House
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Flashing Material, w/ Roofing Tar & Silver Roof Coating	05142416152-15	05/14/24	2451163-023	Exterior, West Elevation, at junction w/ metal roof to the west, north section.	15% Chrys.
	05142416152-44	05/14/24	2451163-024	Exterior, North Elevation, at junction w/ metal roof to the west, west section.	n/a

PLM = Polarized Light Microscopy
 NAD = No Asbestos Detected
 Chrys. = Chrysotile Asbestos
 n/a = Sample not analyzed (stop at first positive result in group)



**Table 2
Inventory of Asbestos Containing Materials**

Building/Addition:		Former True Temper Factory Boiler House 575 Concord Avenue St. Johnsbury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
#05	Window Glazing	26 sq. ft.	<ul style="list-style-type: none"> • Two (2) 25-pane steel windows • One (1) 6-pane steel window
#06	Window Glazing	32 sq. ft.	Three (3) 25-pane steel windows.
#07	Window Glazing	32 sq. ft.	Three (3) 25-pane steel windows.
#08	Window Glazing	3 sq. ft.	One (1) 9-pane steel window.
Exterior	Window Glazing	1 sq. ft.	North elevation of CPAI Area #10, one (1) 6-pane wood window.
	Built-up Roofing/Flashing with Silver Roof Coating	1,927 sq. ft.	On all roof surfaces.
	Flashing Material, w/ Roofing Tar & Silver Roof Coating	10 sq. ft.	West elevation, on brick above metal flashing assoc. with roof over open air portion of Main Building.



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16152
Laboratory Batch #: 2451163
Date Samples Received: 05/16/2024
Date Samples Analyzed: 05/30/2024
Date of Final Report: 05/30/2024

SAMPLE IDENTIFICATION:

Twenty Nine (29) samples from CPAI Proj.#16152-Batch #2 project were submitted by Client on 05/16/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter (<0.25µm) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2451163
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/30/2024
REPORT DATE: 05/30/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2451163-001 05142416152-29	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 8% Fibrous Glass 20% Binder/Filler 72%
2451163-002 05142416152-27	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 8% Fibrous Glass 20% Binder/Filler 72%
2451163-003 05142416152-26	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 8% Fibrous Glass 20% Binder/Filler 72%
2451163-004 05142416152-28	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber 3% Binder/Filler 97%
2451163-005 05142416152-24	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber 20% Binder/Filler 80%
2451163-006 05142416152-23	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber 20% Binder/Filler 80%
2451163-007 05142416152-20	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2451163-008 05142416152-16	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2451163-009 05142416152-21	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #2

ORDER #: 2451163
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/30/2024
REPORT DATE: 05/30/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451163-010						
05142416152-17	LAYER 1 Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
	LAYER 2 Coating, Red	LAYER 2 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-011						
05142416152-13	Bulk Material, Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-012						
05142416152-22	Bulk Material, Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-013						
05142416152-11	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-014						
05142416152-12	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-015						
05142416152-07	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-016						
05142416152-05	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-017						
05142416152-08	Bulk Material, Green/Gray	LAYER 1 100%	Chrysotile	5%	Cellulose Fiber Binder/Filler	1% 94%
2451163-018						
05142416152-10	Bulk Material, Green/Gray Note: Positive Stop	LAYER 1 100%				



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2451163
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/30/2024
REPORT DATE: 05/30/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451163-019 05142416152-04	Bulk Material, Green	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2451163-020 05142416152-14	Bulk Material, Green/White	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2451163-021 05142416152-09	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-022 05142416152-03	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-023 05142416152-15	Bulk Material, Red/Gray/Black	LAYER 1 100%	Chrysotile	15%	Cellulose Fiber Binder/Filler	3% 82%
2451163-024 05142416152-44	Bulk Material, Red/Gray/Black Note: Positive Stop	LAYER 1 100%				
2451163-025 05142416152-49	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-026 05142416152-50	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451163-027 05142416152-47	Bulk Material, Black/Silver	LAYER 1 100%	Chrysotile	5%	Cellulose Fiber Binder/Filler	65% 30%
2451163-028 05142416152-42	Bulk Material, Black/Silver Note: Positive Stop	LAYER 1 100%				



OPTIMUM

Analytical and Consulting, LLC

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BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

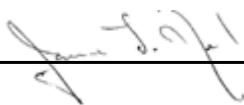
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CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #2

ORDER #: 2451163
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/30/2024
REPORT DATE: 05/30/2024
ANALYST: Jamie Noel

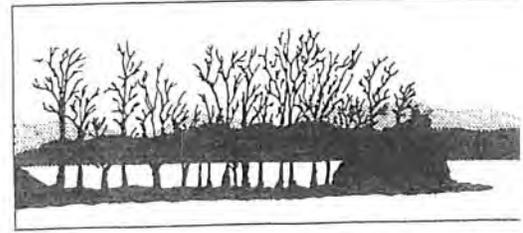
REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451163-029						
05142416152-45	Bulk Material, Black/Silver	LAYER 1 100%	Chrysotile	5%	Cellulose Fiber Binder/Filler	65% 30%

Analyst Signatory: 
 Jamie Noel



245 1163



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj. #:

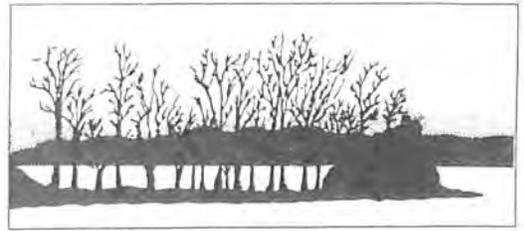
16152

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
X			X		4 BOTTLES
					16152-01 → 75
					Collected 5/14 + 5/15,
					2021

	Date	Time	Name	Signature
Transfer #1	5/15/24	4:00 pm	USA	
to:		TO CXC	VIA FedEx	EX
Transfer #2				
to:				
Transfer #3				
to:				

Celia 5/16/24 9:30

2451163



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152 - Batch # 2

Analytical Service: OAC

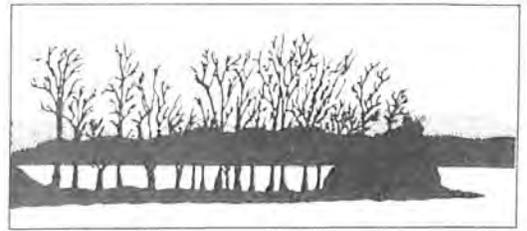
Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
OS142416152 - 29	5/15/24	PLM	1	Analyze Each
-27			1	group until
-26			1	13 - positive -
-28			2	5 - Day TAT
-24			2	
-23			2	
-20			3	
-16			3	
-21			4	
-17			4	
-13			5	
-22			5	
-11			6	
-12			6	
-07			7	

Chain of Custody Form Attached? Yes No

Consultant Signature: [Signature] Page No.: 1 of 2

Cila 5/16/24 9:30

2451163



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
05142-116152-05	5/14/24	PLU	7	See Page 1
-08			8	
-10			8	
-09			9	
-14			10	
-09			11	
-03			11	
-15			12	
-44			12	
-49			13	
-50			13	
-47			14	
-42			14	
-15			15	

Chain of Custody Form Attached?

Yes

No

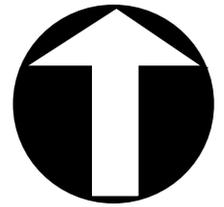
Consultant Signature: [Signature]

Page No.: 2 of 2

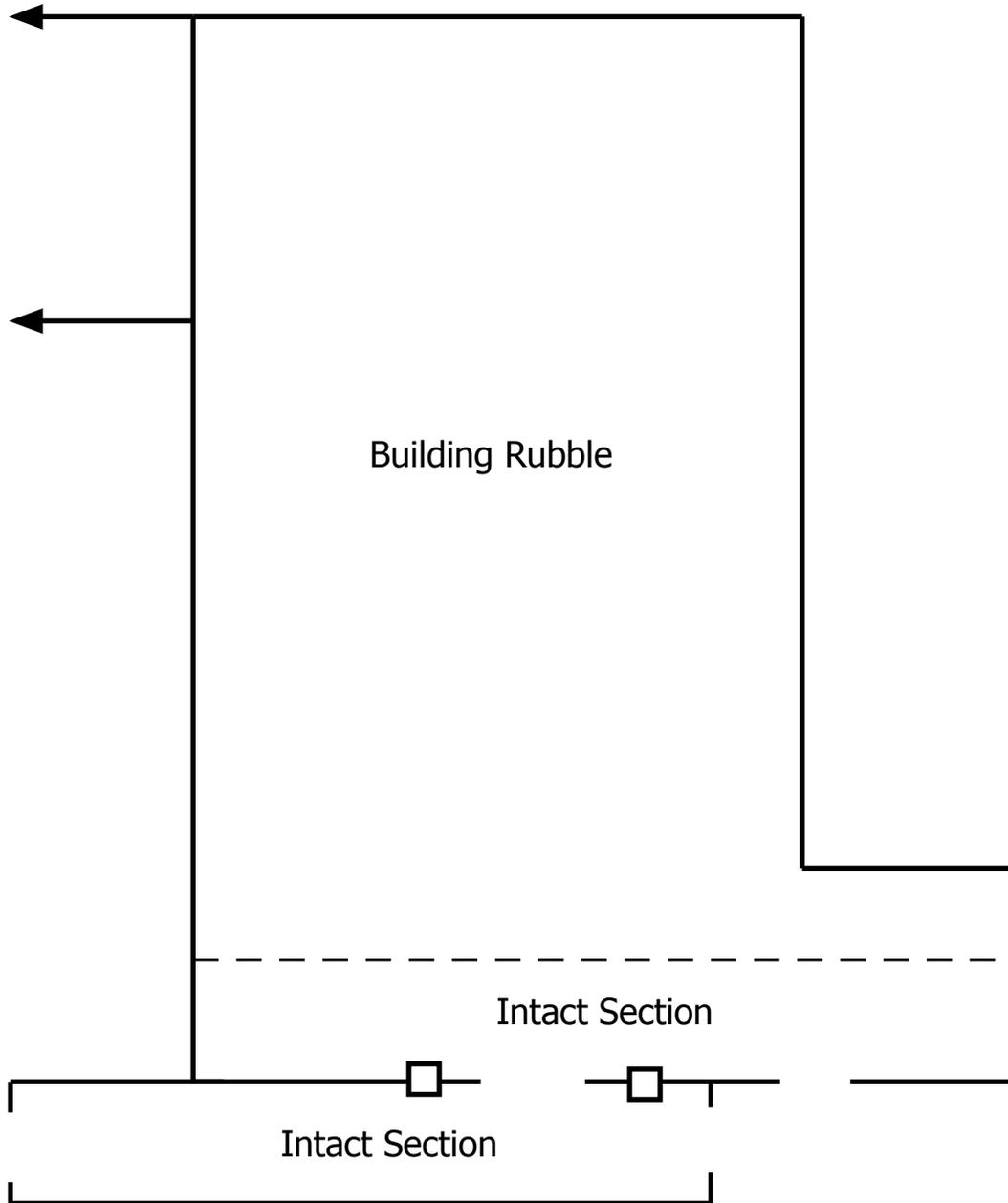
[Signature] 5/16/24 9:30

East Building (Rubble)/Sheds/Miscellaneous

Main Floor



Project North



Clay Point Associates, Inc.
Project #16152
May 14, 2024

East Building
575 Concord Ave.
St. Johnsbury, Vermont

Asbestos Inspection
Not to Scale
Drawn By: Christer Herrmans



**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
East Building (Rubble)/Sheds/Miscellaneous
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Roof Shingle, grey	05142416152-57	05/14/24	2451164-001	Southeast intact portion of building, south facing side of roof, southeast section.	NAD
	05142416152-58	05/14/24	2451164-002	Southeast intact portion of building, south facing side of roof, southeast section.	NAD
Roofing Felt	05142416152-60	05/14/24	2451164-004	Southeast intact portion of building, south facing side of roof, southeast section.	55% Chrys.
	05142416152-59	05/14/24	2451164-003	Southeast intact portion of building, south facing side of roof, southeast section.	NAD
	05142416152-65	05/14/24	2451164-009	Rubble pile, north central section, on ground.	45% Chrys.
	05142416152-64	05/14/24	2451164-010	Rubble pile, north central section, on ground.	n/a
Rolled Roofing, green w/ Flashing Cement	05142416152-63	05/14/24	2451164-005	Rubble pile, north central section, on ground.	8% Chrys.
	05142416152-61	05/14/24	2451164-006	Rubble pile, north central section, on ground.	n/a

(continued)

**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
East Building (Rubble)/Sheds/Miscellaneous
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Rolled Roofing, blue/black, w/ Flashing Cement	05142416152-62	05/14/24	2451164-007	Rubble pile, north central section, on ground.	NAD
	05142416152-53	05/14/24	2451164-008	Rubble pile, north central section, on ground.	NAD
Rolled Roofing, grey w/ Flashing Cement	05152416152-74	05/15/24	2451164-012	Rubble pile, northwest section, on ground.	3% Chrys.
	05152416152-77	05/15/24	2451164-011	Rubble pile, northwest section, on ground.	NAD
Rolled Roofing, w/ Silver Roof Coating	05152416152-72	05/15/24	2451164-013	Rubble pile, northwest section, on ground.	3% Chrys.
	05152416152-73	05/15/24	2451164-014	Rubble pile, northwest section, on ground.	n/a
Silver Roof Coating, assoc. w/ ductwork	05152416152-76	05/15/24	2451164-015	Rubble pile, northwest section, on ground.	3% Chrys.
	05152416152-75	05/15/24	2451164-016	Rubble pile, northwest section, on ground.	n/a
Concrete	05152416152-71	05/15/24	2451164-017	Rubble pile, northwest section, from slab.	NAD
	05152416152-69	05/15/24	2451164-018	Southeast intact portion of building, from foundation, northeast corner.	NAD
	05142416152-48	05/14/24	2451165-001	West Shed north of Main Building, from slab, southwest section.	NAD
	05142416152-46	05/14/24	2451165-002	West Shed north of Main Building, from slab, northeast section.	NAD

**Table 1
Bulk Sample Analysis Inventory**

Building/Addition: Former True Temper Factory
East Building (Rubble)/Sheds/Miscellaneous
575 Concord Avenue
St. Johnsbury, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Concrete (cont.)	05142416152-68	05/14/24	2451165-003	Footprint of former three-bay garage structure south of brick portion of Main Building, east bay, east foundation wall.	NAD
	05142416152-70	05/14/24	2451165-004	Footprint of former three-bay garage structure south of brick portion of Main Building, west bay, slab.	NAD
	05142416152-63	05/14/24	2451165-005	Cellar Hole/Foundation west of Main Building, east foundation wall, south section.	NAD
	05142416152-66	05/14/24	2451165-006	Cellar Hole/Foundation west of Main Building, north foundation wall, center section.	NAD

PLM = Polarized Light Microscopy
 NAD = No Asbestos Detected
 Chrys. = Chrysotile Asbestos
 n/a = sample not analyzed (stop at first positive result in group)



**Table 2
Inventory of Asbestos Containing Materials**

Building/Addition:		Former True Temper Factory East Building (Rubble)/Sheds/Miscellaneous 575 Concord Avenue St. Johnsbury, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
Exterior	Roofing Felt	976 sq. ft.	On southeast intact portion of building, under non-asbestos asphalt shingles.
	Rolled Roofing, green w/ Flashing Cement	11,970 sq. ft.	Collapsed buildings east of Main Building. Asbestos containing roofing materials and silver coating intermingled with non-asbestos building debris throughout area, on concrete slab.
	Rolled Roofing, grey w/ Flashing Cement		
	Rolled Roofing, w/ Silver Roof Coating		
	Silver Coating, assoc. w/ ductwork		



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16152
Laboratory Batch #: 2451164
Date Samples Received: 05/16/2024
Date Samples Analyzed: 05/31/2024
Date of Final Report: 05/31/2024

SAMPLE IDENTIFICATION:

Eighteen (18) samples from CPAI Proj.#16152-Batch #3 project were submitted by Client on 05/16/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter (<0.25µm) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #3

ORDER #: 2451164
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/31/2024
REPORT DATE: 05/31/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451164-001 05142416152-57	Bulk Material, Black/Gray	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Binder/Filler	1% 35% 64%
2451164-002 05142416152-58	Bulk Material, Black/Gray	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Binder/Filler	1% 35% 64%
2451164-003 05142416152-59	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	92% 8%
2451164-004 05142416152-60	Bulk Material, Black	LAYER 1 100%	Chrysotile	55%	Cellulose Fiber Binder/Filler	40% 5%
2451164-005 05142416152-63	Bulk Material, Black/Green	LAYER 1 100%	Chrysotile	8%	Cellulose Fiber Binder/Filler	5% 87%
2451164-006 05142416152-61	Bulk Material, Black/Green Note: Positive Stop	LAYER 1 100%				
2451164-007 05142416152-62	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2451164-008 05142416152-53	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2451164-009 05142416152-65	Bulk Material, Black	LAYER 1 100%	Chrysotile	45%	Cellulose Fiber Binder/Filler	50% 5%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #3

ORDER #: 2451164
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/31/2024
REPORT DATE: 05/31/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2451164-010 05142416152-64	Bulk Material, Black Note: Positive Stop	LAYER 1 100%				
2451164-011 05152416152-77	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Binder/Filler	1% 35% 64%
2451164-012 05152416152-74	Bulk Material, Black	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Fibrous Glass Binder/Filler	1% 35% 61%
2451164-013 05152416152-72	Bulk Material, Black/Silver	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	8% 89%
2451164-014 05152416152-73	Bulk Material, Black/Silver Note: Positive Stop	LAYER 1 100%				
2451164-015 05152416152-76	Bulk Material, Silver	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2451164-016 05152416152-75	Bulk Material, Silver Note: Positive Stop	LAYER 1 100%				
2451164-017 05152416152-71	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2451164-018 05152416152-69	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16152-Batch #3

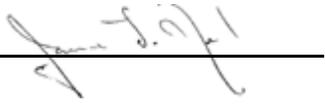
BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2451164
PROJECT #: 16152
DATE COLLECTED: 05/15/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/31/2024
REPORT DATE: 05/31/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
-----------------------------	--------------------------------	----------------------	------------------	-----	----------------------------	-----

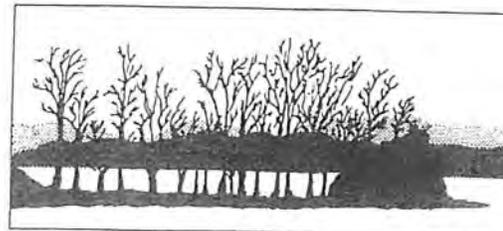
Analyst Signatory: 
 Jamie Noel



161
2

2451164

Clay Point Associates, Inc.



CHAIN OF CUSTODY FORM

CPAI Proj. #:

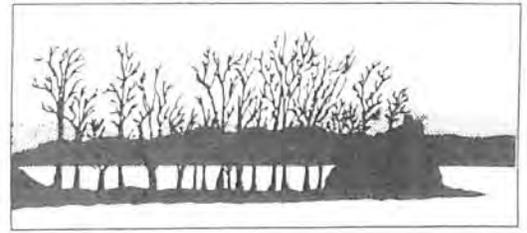
16152

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
X			X		4 BITUMEN
					16152-01 → 75
					Collected 5/14 + 5/15,
					2021

	Date	Time	Name	Signature
Transfer #1	5/15/24	4:00 pm	USA	
to:		TO CAC	VIA REG	EX
Transfer #2				
to:				
Transfer #3				
to:				

Call 5/14/24 9:30

2451164



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152 - Barre # 3

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
05142116152 - 57	5/15/24	Ppm	1	Analyze Each
- 58	↓	↓	1	Group until
- 59	↓	↓	2	1st positive -
- 60	↓	↓	2	5 - Day T+T
- 63	↓	↓	3	
- 61	↓	↓	3	
- 62	↓	↓	4	
- 53	↓	↓	4	
- 65	↓	↓	5	
✓ - 64	↓	↓	5	
05152115652 - 71	5/15/24		6	
- 74	↓	↓	6	
- 72	↓	↓	7	
- 73	↓	↓	7	
✓ - 76	↓	↓	8	

Chain of Custody Form Attached?

Yes No

Consultant Signature: [Signature] Page No.: 1 of 2

Clay 5/16/24 9:30



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16152
Laboratory Batch #: 2451165
Date Samples Received: 05/16/2024
Date Samples Analyzed: 05/21/2024
Date of Final Report: 05/23/2024

SAMPLE IDENTIFICATION:

Six (6) samples from CPAI Proj.# 16152-Batch#4 project were submitted by Client on 05/16/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter (<0.25µm) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

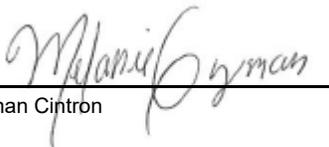
PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.# 16152-Batch#4

ORDER #: 2451165
PROJECT #: 16152
DATE COLLECTED: 05/14/2024
COLLECTED BY: Client
DATE RECEIVED: 05/16/2024
ANALYSIS DATE: 05/21/2024
REPORT DATE: 05/23/2024
ANALYST: Melanie Guzman Cintron

REPORT OF ANALYSIS

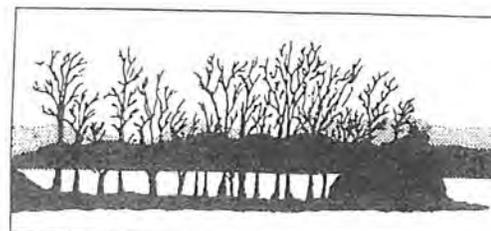
Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2451165-001 05142416152-48	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Non-Fibrous Material 99%
2451165-002 05142416152-46	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Non-Fibrous Material 99%
2451165-003 05152416152-68	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Non-Fibrous Material 99%
2451165-004 05152416152-70	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Non-Fibrous Material 99%
2451165-005 05152416152-63	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 3% Non-Fibrous Material 97%
2451165-006 05152416152-66	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 3% Non-Fibrous Material 97%

Analyst Signatory: 
 Melanie Guzman Cintron



2451165

Clay Point Associates, Inc.



CHAIN OF CUSTODY FORM

CPAI Proj. #:

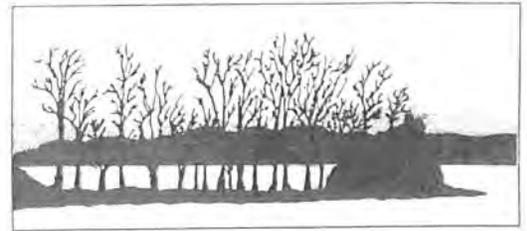
16152

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
X			X		4 BOTTLES
					16152-01 → 75
					Collected 5/14 + 5/15,
					2021

	Date	Time	Name	Signature
Transfer #1	5/15/21	4:30 pm	USA	
to:		TO CAC	VIA FedEx	EX
Transfer #2				
to:				
Transfer #3				
to:				

Celia 5/16/21 9:30

2451165



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 5/15/24 CPAI Proj. #: 16152- Batch #4

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
05152416152-48	5/15/24	PLM	1	Analyze Each
" -46	"	↓	1	Grow until
05152416152-68	5/15/24	↓	2	1st positive -
↓ -70	↓	↓	2	5-DAY TAT
↓ -63	↓	↓	3	
↓ -66	↓	↓	3	

Chain of Custody Form Attached? Yes No

Consultant Signature: [Signature] Page No.: 1 of 1

Pier 5/14/24 9:30

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Consulting Company

Clay Point Associates Inc
PO BOX 1254, 25 BISHOP AVE STE B-2
Williston, Vermont 05495

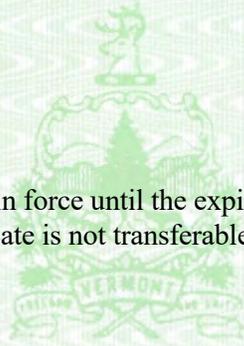
LICENSE: Asb-Co-Con-000031
EXPIRES: 5/2/2025

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Waterbury, VT 05671-8350
ALRP@vermont.gov



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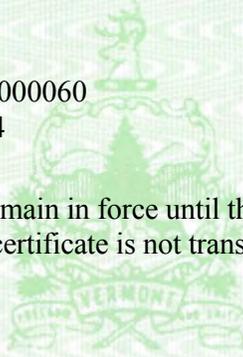
Asbestos Inspector



KYLE AUSTIN

LICENSE: Asb-I/MP-000060

EXPIRES: 10/19/2024



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Asbestos Analytical Company

OPTIMUM ANALYTICAL AND CONSULTING LLC
85 STILES ROAD, STE 201
Salem, New Hampshire 03079

LICENSE: Asb-Co-An-000008
EXPIRES: 6/14/2024

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Asbestos Analytical Company - PLM
Asbestos Analytical Company - PCM

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ASBESTOS ANALYST - PLM

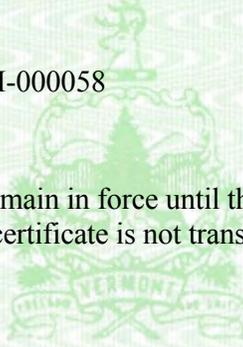


Jaime L Noel

LICENSE: Asb-I-PLM-000058

EXPIRES: 2/28/2025

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