

Clay Point Associates, Inc.

www.claypointassociates.com



January 25, 2024

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

Re: Report of Asbestos Inspection Activities
Greensboro Town Offices, 82 Craftsbury Road, Greensboro, Vermont
CPAI Project #16015

Dear Ms. Pedersen:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on January 16, 2024 on/within the Greensboro Town Offices, 82 Craftsbury Road, Greensboro, Vermont. Inspection activities were limited to evaluation of accessible suspect asbestos containing materials prior to potential future renovations of the structure. CPAI recommends performance of destructive inspection activities prior to future renovations to include, but not limited to, an evaluation in wall cavities, voids in concrete block, older flooring layers, and behind exterior siding materials.

On January 16, 2024, CPAI collected fifty four (54) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service and 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.

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

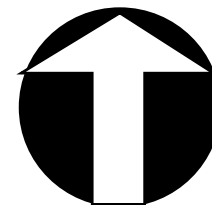
Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

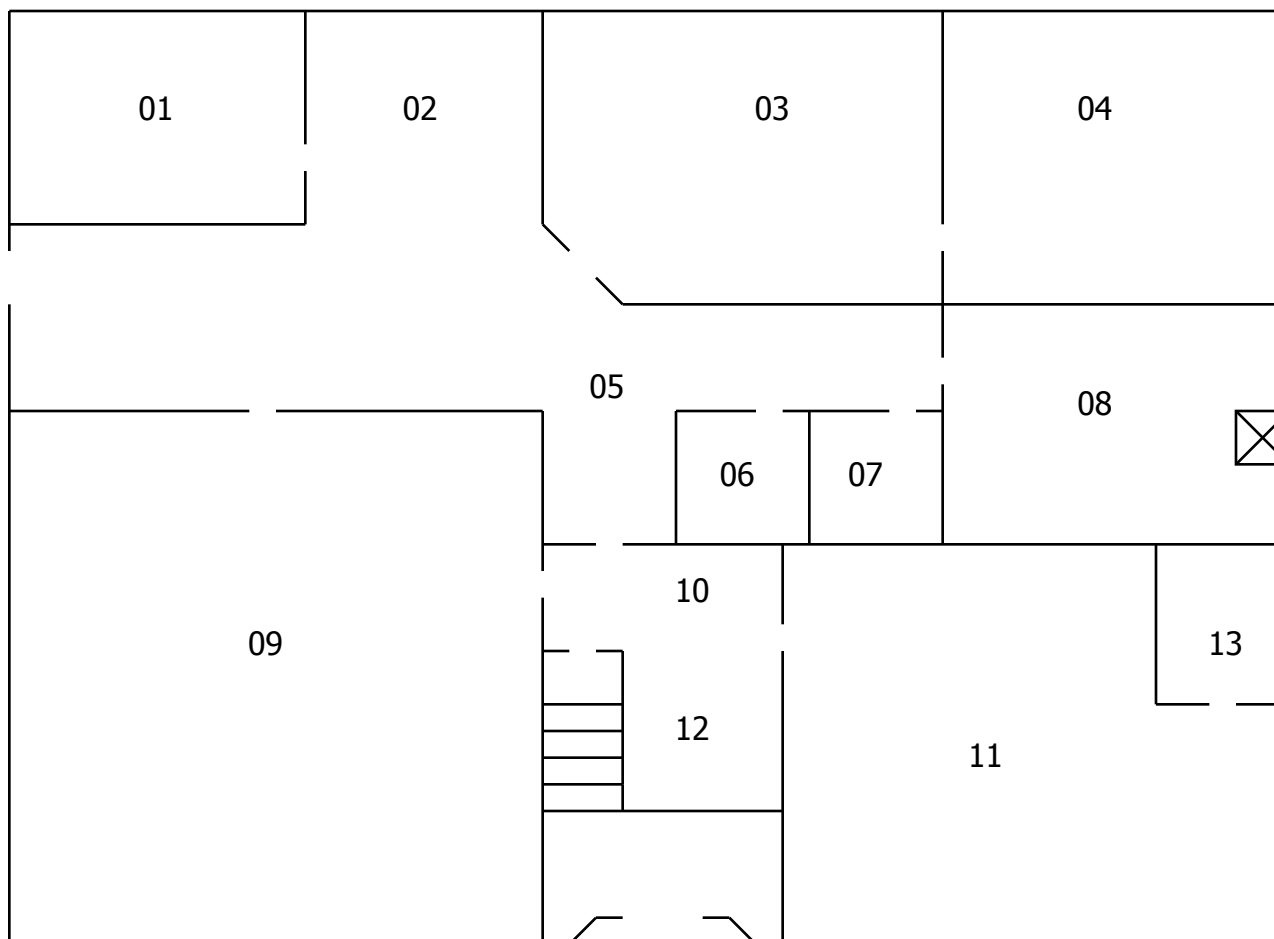
A handwritten signature in black ink, appearing to read 'Kyle B. Austin', written over a light blue horizontal line.

Kyle B. Austin
Environmental Associate

00 = CPAI Area Numbers



Project North



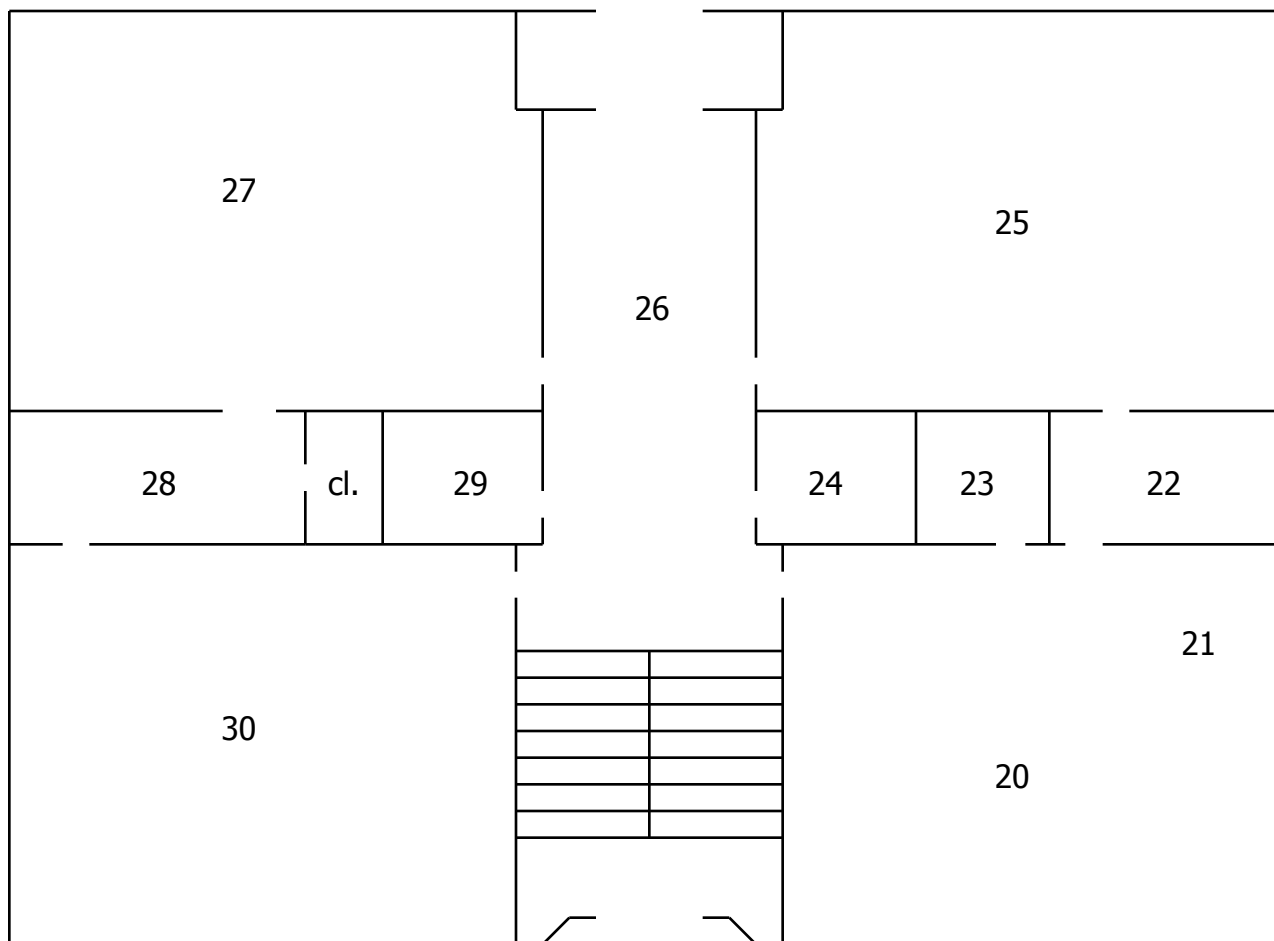
FIRST FLOOR

Clay Point Associates, Inc.
Project #16015
January 16, 2024

Greensboro Town Offices
82 Craftsbury Road
Greensboro, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Kyle Austin

00 = CPAI Area Numbers



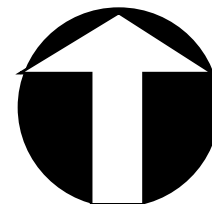
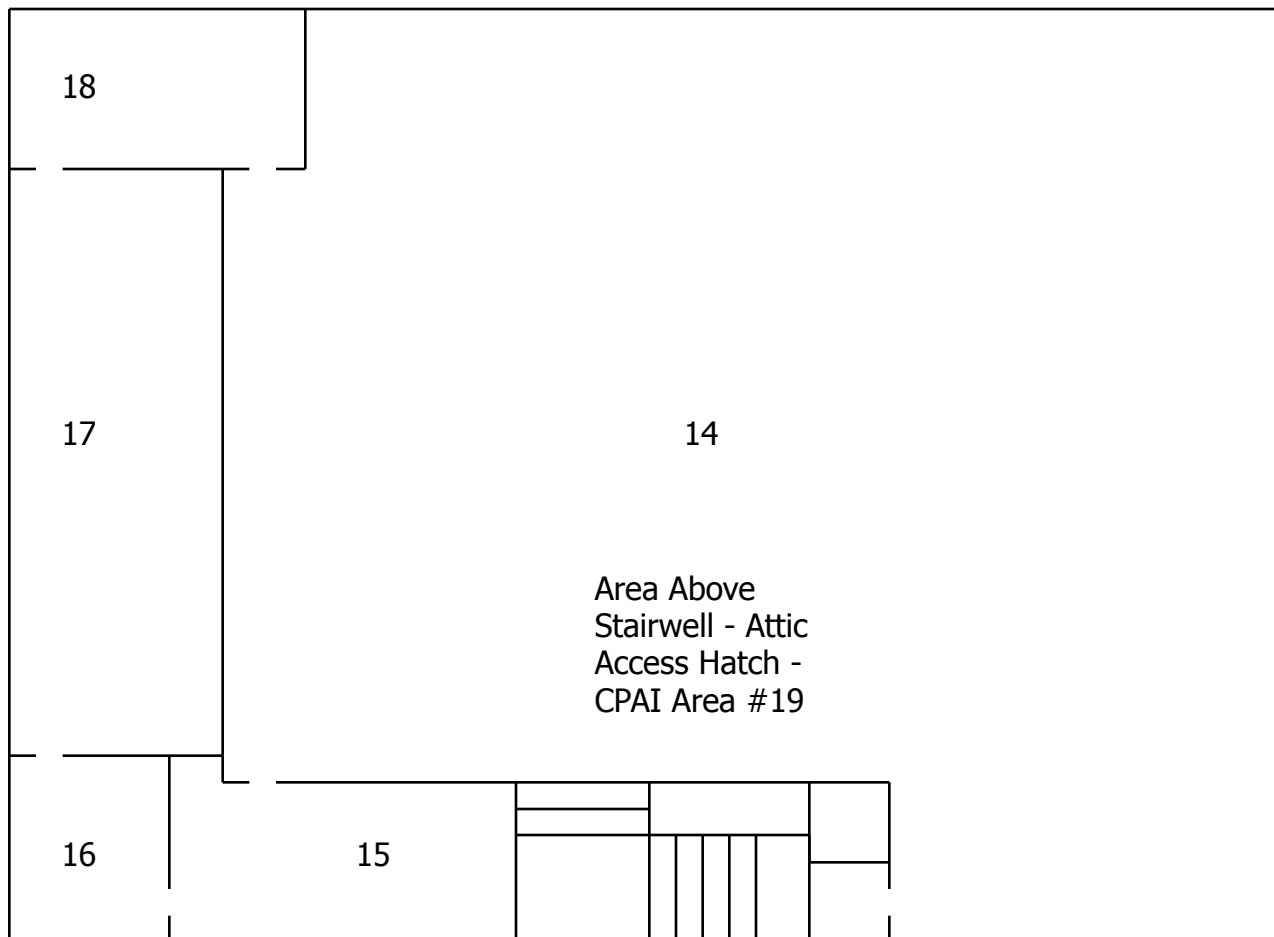
SECOND FLOOR

Clay Point Associates, Inc.
Project #16015
January 16, 2024

Greensboro Town Offices
82 Craftsbury Road
Greensboro, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Kyle Austin

00 = CPAI Area Numbers



Project North

THIRD FLOOR

Clay Point Associates, Inc.
Project #16015
January 16, 2024

Greensboro Town Offices
82 Craftsbury Road
Greensboro, Vermont

Asbestos Inspection
Not to Scale
Drawn by: Kyle Austin



Table 1
Bulk Sample Analysis Inventory

Building/Addition:

Greensboro Town Offices
82 Craftsbury Road
Greensboro, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Textured Ceiling Material	01162416015-24	1/16/24	2450025-005	CPAI Area #01, 1 ft. 7 in. from south wall, 6 in. from east wall.	NAD
	01162416015-06	1/16/24	2450025-006	CPAI Area #01, 2 ft. 3 in. from south wall, 3 ft. 2 in. from west wall.	NAD
	01162416015-11	1/16/24	2450025-007	CPAI Area #01, 2 ft. 8 in. from south wall, 7 ft. 1 in. from east wall.	NAD
Joint Compound, assoc. with Gypsum Wall-board	01162416015-08	1/16/24	2450025-047	CPAI Area #02, o ceiling, 2 in. from south wall, 25 ft. 5 in. from west wall.	NAD
	01162416015-18	1/16/24	2450025-048	CPAI Area #04, on south wall, 2 ft. 1 in. from west wall, 4 ft. 8 in. from floor.	NAD
	01162416015-25	1/16/24	2450025-049	CPAI Area #08, on west wall, 5 ft. 4 in. from north wall, 7 ft. 2 in. from floor.	NAD
	01162416015-03	1/16/24	2450025-050	CPAI Area #11, on south wall, 6 ft. 1 in. from east wall, 7 ft. 9 in. from floor.	NAD
	01162416015-31	1/16/24	2450025-051	CPAI Area #11, on north wall, 1 in. from west wall, 3 ft. 5 in. from floor.	NAD
	01162416015-39	1/16/24	2450025-052	CPAI Area #29, on west wall, 1 in. from south wall, 3 ft. 5 in. from floor.	NAD
(continued)					

Table 1
Bulk Sample Analysis Inventory

Building/Addition:				Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont	
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Joint Compound, assoc. with Gypsum Wall-board (cont.)	01162416015-34	1/16/24	2450025-053	CPAI Area #29, on east wall, 1 in. from north wall, 3 ft. 10 in. from floor.	NAD
	01162416015-46	1/16/24	2450025-054	CPAI Area #28, in closet, on south wall, 1 in. from east wall, 5 ft. 7 in. from floor.	NAD
Gypsum Wall-board	01162416015-07	1/16/24	2450025-042	CPAI Area #02, on south wall, 25 ft. from west wall, 7 ft. 9 in. from floor.	NAD
	01162416015-27	1/16/24	2450025-043	CPAI Area #08, on west wall, 5 ft. 4 in. from north wall, 4 ft. 2 in. from floor.	NAD
	01162416015-23	1/16/24	2450025-044	CPAI Area #11, on south wall, 6 ft. from east wall, 8 ft. 1 in. from floor.	NAD
	01162416015-33	1/16/24	2450025-045	CPAI Area #29, on north wall, 1 ft. 4 in. from east wall, 5 ft. 8 in. from floor.	NAD
	01162416015-42	1/16/24	2450025-046	CPAI Area #28, in closet, on east wall, 1 ft. 9 in. from south wall, 5 ft. 9 in. from floor.	NAD
Suspended Ceiling Tile, 2' x 4', width worm pattern with pinholes	01162416015-09	1/16/24	2450025-010	CPAI Area #02, 3 in. from south wall, 27 ft. 11 in. from west wall (patch – 1 tile).	NAD
Suspended Ceiling Tile, 2' x 4', length worm pattern with pinholes	01162416015-26	1/16/24	2450025-011	CPAI Area #05, 7 ft. 5 in. from south wall, 1 ft. 4 in. from east wall.	NAD
	01162416015-30	1/16/24	2450025-012	CPAI Area #02, 2 ft. 9 in. from north wall, 4 ft. from east wall.	NAD

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Building/Addition:			Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Suspended Ceiling Tile, 2' x 4', random indentations with pinholes	01162416015-02	1/16/24	2450025-013	CPAI Area #06, 1 ft. 2 in. from north wall, 1 ft. 5 in. from west wall.	NAD
	01162416015-16	1/16/24	2450025-014	CPAI Area #09, 7 ft. 7 in. from north wall, 11 ft. 2 in. from east wall.	NAD
Suspended Ceiling Tile, 2' x 4', random worm pattern with pinholes	01162416015-22	1/16/24	2450025-015	CPAI Area #11, 10 ft. 10 in. from south wall, 5 ft. 3 in. from west wall.	NAD
	01162416015-19	1/16/24	2450025-016	CPAI Area #11, 1 in. from south wall, 6 ft. 10 in. from east wall.	NAD
Covebase, 4", green	01162416015-04	1/16/24	2450025-017	CPAI Area #06, on north wall, 5 in. from west wall, 4 in. from floor.	NAD
	01162416015-10	1/16/24	2450025-018	CPAI Area #07, on north wall, 11 in. from east wall, 4 in. from floor.	NAD
Adhesive, assoc. with Covebase, 4", green	01162416015-04A	1/16/24	2450025-019	CPAI Area #06, on north wall, 5 in. from west wall, 4 in. from floor.	NAD
	01162416015-10A	1/16/24	2450025-020	CPAI Area #07, on north wall, 11 in. from east wall, 4 in. from floor.	NAD
Covebase, 4", black	01162416015-36	1/16/24	2450025-033	CPAI Area #29, on east wall, 2 ft. 4 in. from north wall, 4 in. from floor.	NAD
	01162416015-35	1/16/24	2450025-034	CPAI Area #28, on north wall, 1 in. from east wall, 4 in. from floor.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:			Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Adhesive, assoc. with Covebase, 4", black	01162416015-36A	1/16/24	2450025-035	CPAI Area #29, on east wall, 2 ft. 4 in. from north wall, 4 in. from floor.	NAD
	01162416015-35A	1/16/24	2450025-036	CPAI Area #28, on north wall, 1 in. from east wall, 4 in. from floor.	NAD
Linoleum Floor Covering, white with green and grey markings	01162416015-17	1/16/24	2450025-021	CPAI Area #06, 1 in. from north wall, 7 in. from west wall.	NAD
	01162416015-13	1/16/24	2450025-022	CPAI Area #07, 1 in. from north wall, 1 ft. 1 in. from east wall.	NAD
Linoleum Floor Covering, grey and white, gravel pattern	01162416015-40	1/16/24	2450025-028	CPAI Area #29, 1 in. from south wall, 1 ft. 9 in. from west wall.	NAD
	01162416015-41	1/16/24	2450025-029	CPAI Area #28, in doorway to closet, 11 in. south of north door jamb.	NAD
Linoleum Floor Covering, white squares with grey border	01162416015-38	1/16/24	2450025-030	CPAI Area #22, 3 in. from north wall, 2 ft. 11 in. from east wall.	NAD
	01162416015-37	1/16/24	2450025-031	CPAI Area #22 in north doorway, 1 in. east of west door jamb.	NAD
Vinyl Floor Tile, 12" x 12", aqua blue, mottled	01162416015-05	1/16/24	2450025-001	CPAI Area #10, 4 in. from north wall, 2 ft. 2 in. from east wall.	NAD
	01162416015-15	1/16/24	2450025-002	CPAI Area #02, 8 ft. 10 in. from north wall, 6 in. from west wall.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:			Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Adhesive, assoc. with Vinyl Floor Tile, 12" x 12", aqua blue, mottled	01162416015-05A	1/16/24	2450025-003	CPAI Area #10, 4 in. from north wall, 2 ft. 2 in. from east wall.	NAD
	01162416015-15A	1/16/24	2450025-004	CPAI Area #02, 8 ft. 10 in. from north wall, 6 in. from west wall.	NAD
Carpet Adhesive, yellow	01162416015-21	1/16/24	2450025-026	CPAI Area #09, 4 ft. 8 in. from north wall, 5 ft. 11 in. from west wall.	NAD
	01162416015-01	1/16/24	2450025-027	CPAI Area #09, 10 ft. 1 in. from north wall, 3 in. from east wall.	NAD
Sink Undercoating, white	01162416015-32	1/16/24	2450025-032	CPAI Area #22, 2 ft. 7 in. from north wall, 1 ft. 4 in. from west wall.	NAD
	01162416015-43	1/16/24	2450025-037	CPAI Area #28, 1 ft. 3 in. from north wall, 10 ft. 3 in. from east wall.	3% Chrys.
Stage Curtains, brown	01162416015-47	1/16/24	2450025-038	CPAI Area #17, 10 ft. 6 in. from south wall, 6 ft. 5 in. from west wall, 8 ft. 2 in. from floor.	NAD
	01162416015-45	1/16/24	2450025-039	CPAI Area #17, 1 ft. 10 in. from south wall, 14 ft. 4 in. from west wall, 1 ft. 4 in. from floor.	NAD
Blown-in Insulation	01162416015-44	1/16/24	2450025-040	CPAI Area #18, loose in west wall cavity, south section.	NAD
	01162416015-48	1/16/24	2450025-041	Attic, loose above access hatch in CPAI Area #19.	NAD

Table 1
Bulk Sample Analysis Inventory

Building/Addition:	Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont
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Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Flue Cement, grey	01162416015-20	1/16/24	2450025-023	CPAI Area #08, on west side of chimney, 3 ft. 7 in. from west wall, 5 ft. 5 in. from floor.	NAD
Mortar, assoc. with concrete block	01162416015-14	1/16/24	2450025-008	CPAI Area #01, on south wall, 2 ft. 4 in. from west wall, 3 ft. 4 in. from floor.	NAD
	01162416015-12	1/16/24	2450025-009	CPAI Area #01, on east wall, 1 ft. 4 in. from south wall, 5 ft. 5 in. from floor.	NAD
Mortar, assoc. with brick	01162416015-28	1/16/24	2450025-024	CPAI Area #08, on north side of chimney, 1 ft. 10 in. from east wall, 3 ft. 6 in. from floor.	NAD
	01162416015-29	1/16/24	2450025-025	CPAI Area #08, on west side of chimney, 4 ft. 9 in. from south wall, 5 ft. from floor.	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected
Chrys. = Chrysotile Asbestos



Table 2
Inventory of Asbestos Containing Materials

Building/Addition:		Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
#28	Sink Undercoating, white	4 sq. ft.	On underside off sink at north wall.
**Limited inspection, any materials not appearing in the Bulk Sample Analysis ** Inventory (Table 1) should be assumed to contain asbestos pending collection of representative samples and laboratory analysis.			



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

Project Reference: 16015
Laboratory Batch #: 2450025
Date Samples Received: 01/18/2024
Date Samples Analyzed: 01/23/2024
Date of Final Report: 01/23/2024

SAMPLE IDENTIFICATION:

Fifty Four (54) samples from CPAI Proj.#16015 project were submitted by Client on 01/18/2024

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 ($<0.25\mu\text{m}$) 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.#16015

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 #: 2450025
PROJECT #: 16015
DATE COLLECTED: 01/16/2024
COLLECTED BY: Client
DATE RECEIVED: 01/18/2024
ANALYSIS DATE: 01/23/2024
REPORT DATE: 01/23/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2450025-001 01162416015-05	Bulk Material, Blue	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-002 01162416015-15	Bulk Material, Blue	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-003 01162416015-05A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-004 01162416015-15A	Adhesive, Tan	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-005 01162416015-24	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-006 01162416015-06	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-007 01162416015-11	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-008 01162416015-14	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-009 01162416015-12	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-010 01162416015-09	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber Fibrous Glass Binder/Filler 65% 15% 20%



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CLIENT: Clay Point Associates, Inc.
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CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16015

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

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ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2450025-011 01162416015-26	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-012 01162416015-30	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-013 01162416015-02	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-014 01162416015-16	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-015 01162416015-22	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-016 01162416015-19	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2450025-017 01162416015-04	Bulk Material, Green	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2450025-018 01162416015-10	Bulk Material, Green	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2450025-019 01162416015-04A	Adhesive, Beige	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%



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CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16015

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 #: 2450025
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ANALYSIS DATE: 01/23/2024
REPORT DATE: 01/23/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2450025-020 01162416015-10A	Adhesive, Beige	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-021 01162416015-17	Bulk Material, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 65% 35%
2450025-022 01162416015-13	Bulk Material, White/Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 65% 35%
2450025-023 01162416015-20	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-024 01162416015-28	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-025 01162416015-29	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-026 01162416015-21	Bulk Material, Tan	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-027 01162416015-01	Bulk Material, Tan	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-028 01162416015-40	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 65% 35%
2450025-029 01162416015-41	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 65% 35%



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LOCATION: CPAI Proj.#16015

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PROJECT #: 16015
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ANALYSIS DATE: 01/23/2024
REPORT DATE: 01/23/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2450025-030 01162416015-38	Bulk Material, White/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2450025-031 01162416015-37	Bulk Material, White/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2450025-032 01162416015-32	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	20% 80%
2450025-033 01162416015-36	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2450025-034 01162416015-35	Bulk Material, Black	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2450025-035 01162416015-36A	Bulk Material, Tan	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2450025-036 01162416015-35A	Bulk Material, Tan	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2450025-037 01162416015-43	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2450025-038 01162416015-47	Bulk Material, Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	99% 1%
2450025-039 01162416015-45	Bulk Material, Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	99% 1%



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.#16015

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 #: 2450025
PROJECT #: 16015
DATE COLLECTED: 01/16/2024
COLLECTED BY: Client
DATE RECEIVED: 01/18/2024
ANALYSIS DATE: 01/23/2024
REPORT DATE: 01/23/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2450025-040 01162416015-44	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Mineral Wool 97% Binder/Filler 2%
2450025-041 01162416015-48	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Mineral Wool 97% Binder/Filler 2%
2450025-042 01162416015-07	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2450025-043 01162416015-27	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2450025-044 01162416015-23	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2450025-045 01162416015-33	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2450025-046 01162416015-42	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2450025-047 01162416015-08	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2450025-048 01162416015-18	Bulk Material, White	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

CLIENT: Clay Point Associates, Inc.
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LOCATION: CPAI Proj.#16015

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 #: 2450025
PROJECT #: 16015
DATE COLLECTED: 01/16/2024
COLLECTED BY: Client
DATE RECEIVED: 01/18/2024
ANALYSIS DATE: 01/23/2024
REPORT DATE: 01/23/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2450025-049 01162416015-25	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-050 01162416015-03	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-051 01162416015-31	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-052 01162416015-39	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-053 01162416015-34	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%
2450025-054 01162416015-46	Bulk Material, White	LAYER 1 100%	None Detected	Cellulose Fiber Binder/Filler 1% 99%

**Analyst
Signatory:**

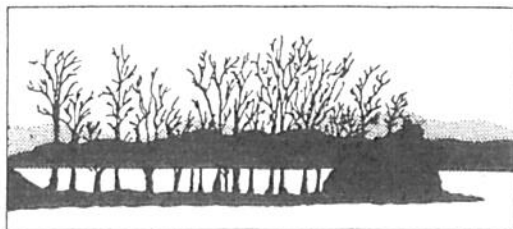
Jamie Noel



NVLAP Lab Code: 101433-0

2450025

Clay Point Associates, Inc.



CHAIN OF CUSTODY FORM

CPAI Proj. #:

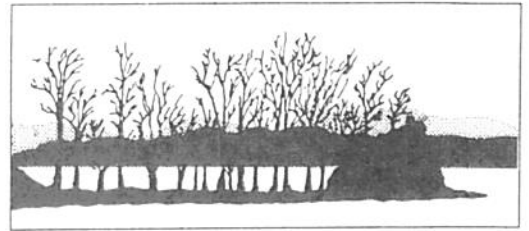
16015

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
X			X		01162416015 - a → 48
					54 Sample

	Date	Time	Name	Signature
Transfer #1	1/17/24	11:00pm	Kyle	Kyle [Signature]
to:		TO ORC	Via JES	Exp
Transfer #2				
to:				
Transfer #3				
to:				

2450025

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 11/17/24 CPAI Proj. #: 16015

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
01162416015 - 05	11/16/24	PLM	1	Analyze Each
-15			1	Group Unit 1
-054			2	1st positive -
-154			2	"A" Sample we
-24			3	addressing -
-06			3	*3-Day TAT*
-11			3	
-14			4	
-12			4	
-09			5	
-26			6	
-30			6	
-02			7	
-16			7	
-22			8	

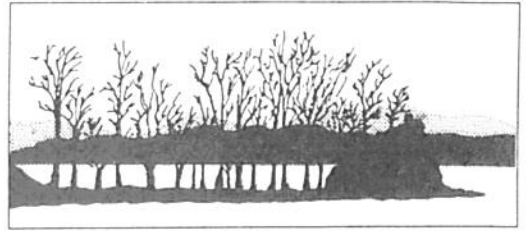
Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: [Signature] Page No.: 1 of 4

2450025



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 1/17/24 CPAI Proj. #: 16015

Analytical Service: OTC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
01162416015 - 19	1/14/24	plm	8	SEE PAGE 1
-08			9	
-10			9	
-01A			10	
-10A			10	
-17			11	
-13			11	
-20			12	
-28			13	
-29			13	
-21			14	
-01			14	
-70			15	
-41			15	
-38			16	

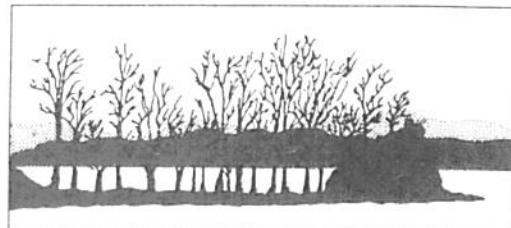
Chain of Custody Form Attached?

Yes

No

Consultant Signature: [Signature] Page No.: 2 of 4

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 11/17/24 CPAI Proj. #: 16015

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
01162416015 - 37	11/16/24	PLM	16	SEE PAGE 1
-32			17	
-36			18	
-35			18	
-36A			19	
-35A			19	
-43			20	
-47			21	
-45			21	
-44			22	
-48			22	
-07			23	
-27			24	
-23			25	
-33			26	

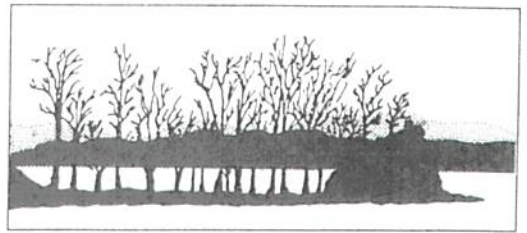
Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: [Signature] Page No.: 3 of 4

2450025



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 1/17/24 CPAI Proj. #: 16015

Analytical Service: OTC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
011624/16015 - 42	1/16/24	PLM	27	See Page 1
-08			28	
-18			29	
-25			30	
-03			31	
-31			32	
-39			33	
-34			34	
-46			35	

Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: [Signature] Page No.: 4 of 4

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Consulting Company

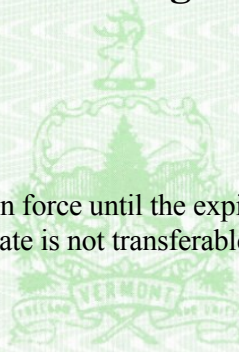
CLAY POINT ASSOCIATES INC
PO BOX 1254, 25 BISHOP AVE STE B-2
Williston, Vermont 05495

LICENSE: Asb-Co-Con-000001
EXPIRES: 4/27/2024

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.



Scan the QR Code for
License Information



Vermont Department of Health
Environmental Health
108 Cherry Street, Suite 201
Burlington, VT 05402
ALRP@vermont.gov



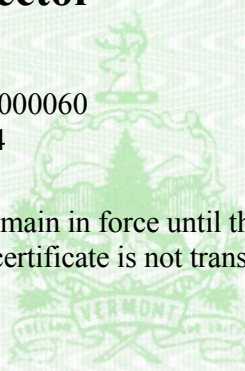
Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Inspector

KYLE AUSTIN

LICENSE: Asb-I/MP-000060

EXPIRES: 10/19/2024



This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.



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License Information

Vermont Department of Health
Environmental Health
108 Cherry Street, Suite 201
Burlington, VT 05402
ALRP@vermont.gov

Certificate of License - Vermont Asbestos and Lead Regulatory Program

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

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.

Asbestos Analytical Company - PLM

Asbestos Analytical Company - PCM



Scan the QR Code for
License Information

Vermont Department of Health
Environmental Health
108 Cherry Street, Suite 201
Burlington, VT 05402
ALRP@vermont.gov

ASBESTOS PLM ANALYST

JAMIE L NOEL
85 STILES ROAD SUITE 201
SALEM, NH 03079

Vermont Department of Health
Environmental Health
P.O. Box 70 - Drawer 30
Burlington, VT 05402-0070

LICENSE: PB307779

EXPIRES: Wednesday, February 28, 2024

CERTIFICATE OF LICENSE
VERMONT ASBESTOS REGULATORY PROGRAM

THIS CERTIFICATE SHALL REMAIN IN FORCE UNTIL THE EXPIRATION DATE UNLESS REVOKED OR VOIDED BEFORE THAT TIME. THIS CERTIFICATE IS NOT TRANSFERABLE AND IS VALID ONLY FOR THE ABOVE PARTY.

COPY OF THIS CERTIFICATE AND PHOTO ID CARD MUST BE ON SITE AT ALL TIMES.