Clay Point Associates, Inc.
www.claypointassociates.com

January 31, 2024

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

Re: Initial Screening for Polychlorinated Biphenyls (PCBs) in Building Materials
Greensboro Town Offices, 82 Craftsbury Road, Greensboro, Vermont
CPAI Project #16015

Dear Ms. Pedersen:

Enclosed is documentation related to professional environmental consulting activities performed by Clay Point Associates, Inc. (CPAI) on/within the Greensboro Town Offices, 82 Craftsbury Road, Greensboro, Vermont. On January 16, 2024, CPAI performed an initial screening for the presence of Polychlorinated Biphenyls (PCBs) in building materials on/within the building. The initial screening was conducted to partially address federal regulations concerning PCBs as set forth in 40 CFR Part 761.

Representative samples were collected using hand tools. All tools were properly decontaminated prior to use, and after the collection of each sample. For each sample, a minimum of two (2) grams of the suspect material was collected in re-closable sample containers and assigned a unique identifying number. All samples were packed in ice and shipped via courier to Eastern Analytical, Inc. (EAI), 51 Antrim Drive, Concord, Concord, New Hampshire. Analysis was performed by EAI in accordance with EPA Method 8082 with extraction by EPA Method 3540C (Soxhlet). The EAI analytical report is attached.

A total of four (4) samples were collected. Please refer to Table 1 (Building Material Sampling Locations) for specific information regarding materials sampled and sampling locations. The attached Table 2 (PCBs in Building Materials Analysis Results Summary) summarizes analytical results for each sample. Sample locations are depicted on the attached floor plan.

The results of analysis indicate that PCBs were not present at concentrations greater than the detection limit in two (2) of the four (4) samples, therefore, these materials are not subject to PCB regulations found at 40 CFR 761.

PCBs were present in two (2) samples at concentrations < 50 ppm (parts per million). In accordance with the Toxic Substances Control Act (TSCA) and the PCB regulations found at 40 CFR 761, the building material comprising these two (2) samples are defined as "Excluded PCB Products". Excluded PCB Products include materials with a PCB concentration < 50 ppm where the source is reasonably believed to be from manufacture and not from a release. The removal of Excluded PCB Products is not regulated by the EPA. Disposal of PCB Excluded Products is allowed at landfills that are permitted, licensed, or registered to accept these materials.

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

Sincerely,
CLAY POINT ASSOCIATES, INC.

Kyle B. Austin
Environmental Associate

TABLE 2
BUILDING MATERIAL SAMPLING LOCATIONS (PCB's)

Client:	Montrose Environmental
CPAI Project No.:	16015
Project Location:	Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont

DESCRIPTION	DATE COLLECTED	CPAI SAMPLE NO.	LOCATION
Exterior Trim Paint, white (wood substrate)	1/16/24	16015-PCB1 16015-PCB3	Exterior, south elevation, 2nd floor level, composite sample from windows at east section. Exterior, south elevation, composite from upper center windows.
Paint, blue, assoc. with tin walls/ceilings (tin/metal substrate)	1/16/24	16015-PCB2	CPAI Area #20, southwest corner, above level of suspended ceiling. Composite sample from walls, ceiling, and crown molding.
Paint, white, assoc. with tin walls/ceilings (tin/metal substrate)	1/16/24	16015-PCB4	South Stairwell, top landing, composite samples from walls/ceiling.

TABLE 2 – PCBs IN BLDG. MATERIALS ANALYSIS RESULTS SUMMARY
January 31, 2024

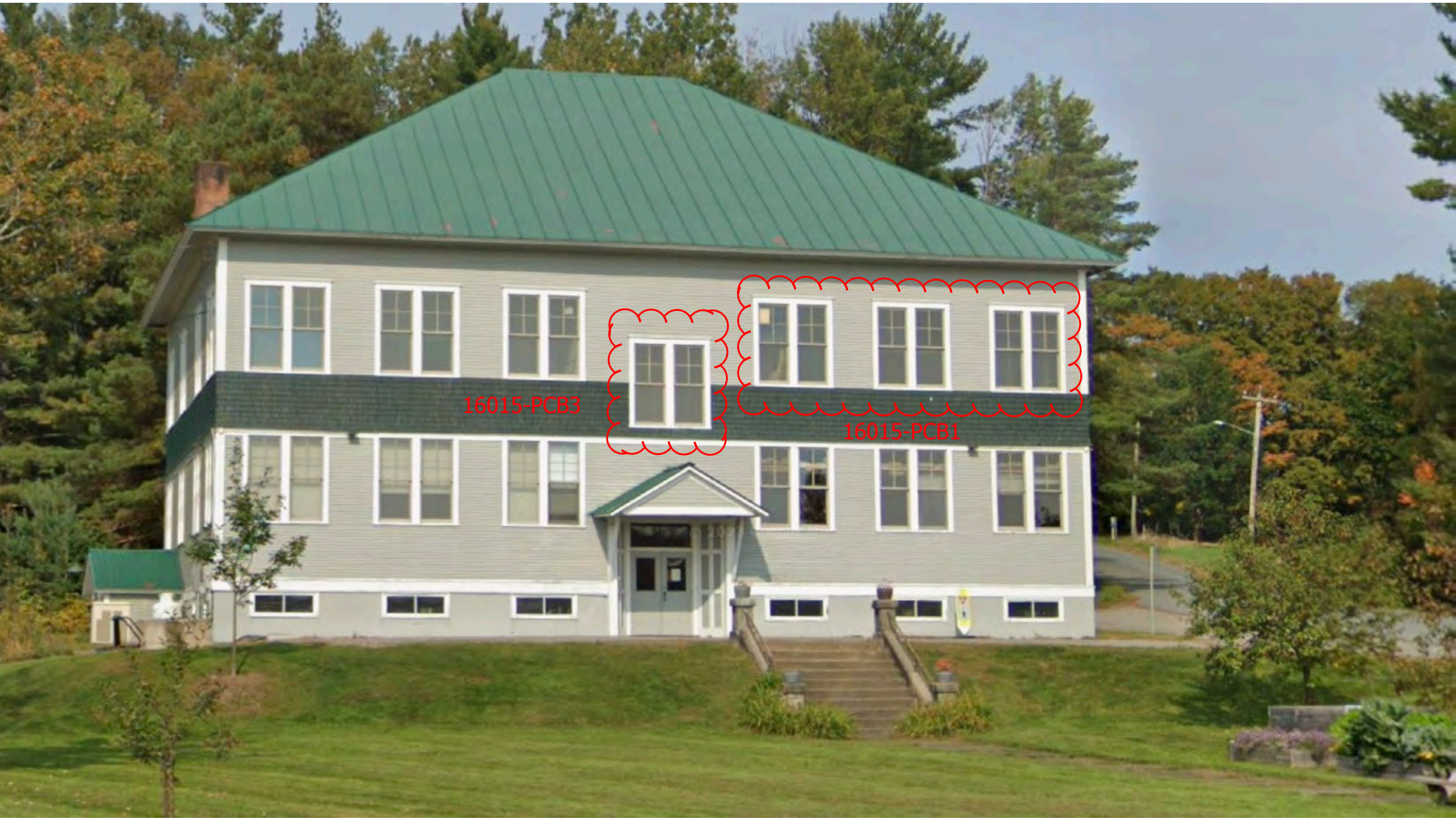
CLAY POINT ASSOCIATES, INC.
(802) 879-2600 info@claypointassociates.com
P.O. Box 1254•Williston, VT•05495-1254

CLIENT: Montrose Environmental
CPAI PROJECT NO.: 16015
PROJECT LOCATION: Greensboro Town Offices
82 Craftsbury Road
Greensboro, Vermont

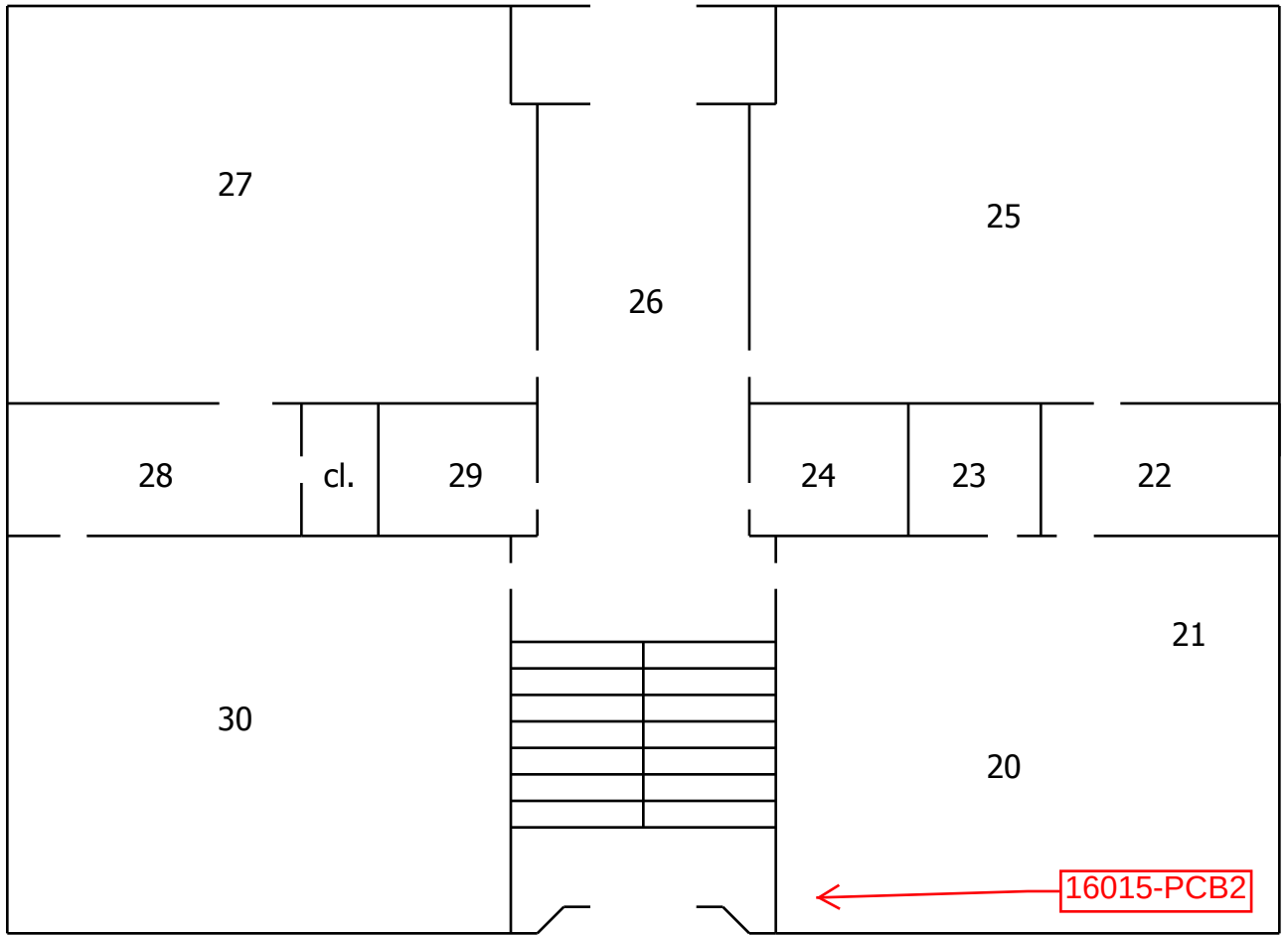
SAMPLE I.D.	DATE	PCB-1016	PCB-1221	PCB-1232	PCB-1242	PCB-1248	PCB-1254	PCB-1260	PCB-1262	PCB-1268	TOTAL PCB (mg/kg)	BUILDING MATERIAL
16015-PCB1	1/16/24	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	< 0.7	Built-up Roofing
16015-PCB2		< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	**9.2**	< 0.8	**3.4**	< 0.8	**12.6**	
16015-PCB3		< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	< 0.9	Flashing Cement
16015-PCB4		< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	**31**	**2.6**	< 0.8	< 0.8	**33.6**	

PCB Inspection - Building Materials
Greensboro Town Offices
85 Craftsbury Road
Greensboro, Vermont

January 16, 2024



00 = CPAI Area Numbers

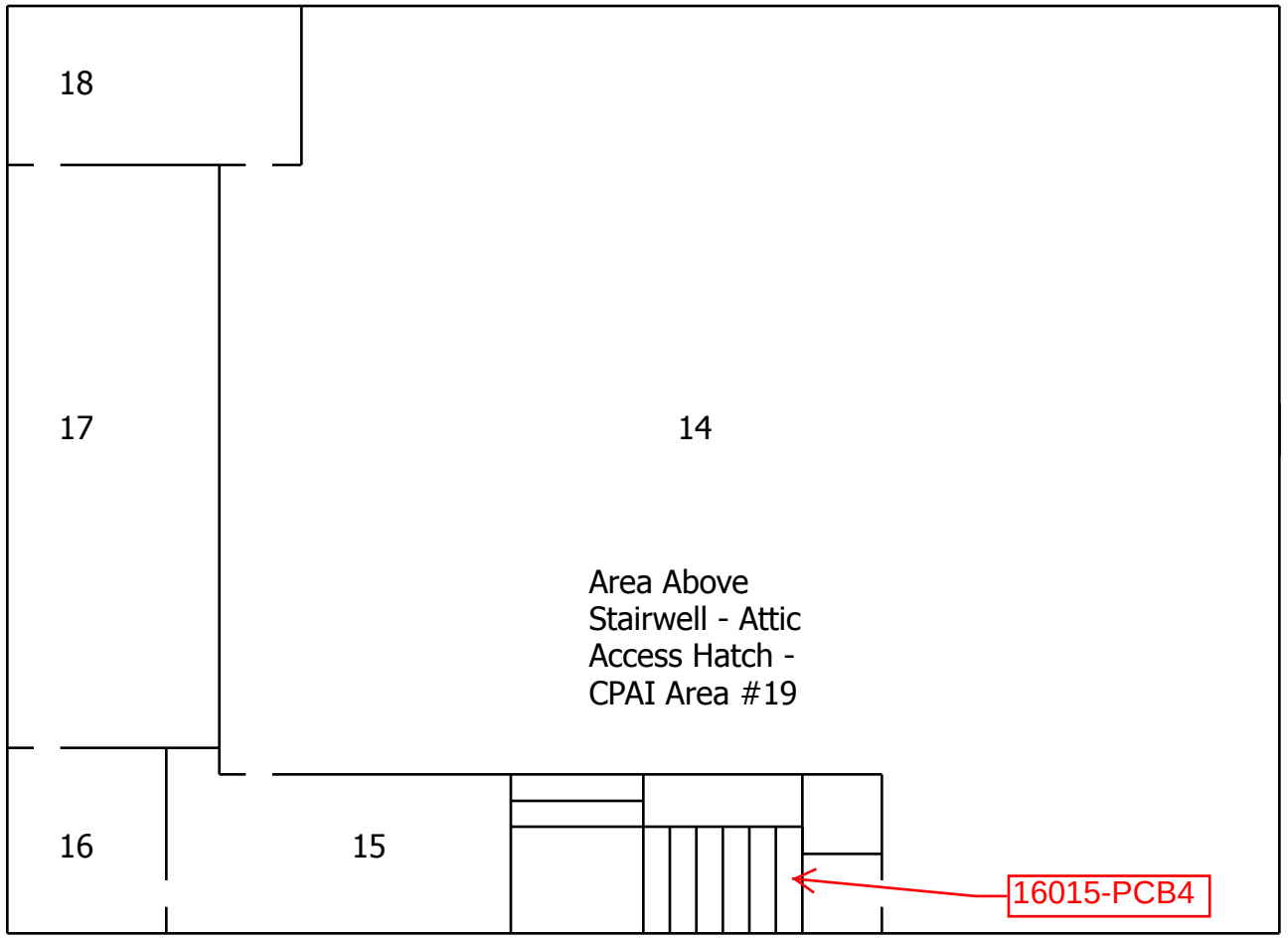


Project North

SECOND FLOOR

Clay Point Associates, Inc. Project #16015 January 16, 2024	Greensboro Town Offices 82 Craftsbury Road Greensboro, Vermont	PCB Inspection (Bldg. Materials) 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	PCB Inspection (Bldg. Materials) Not to Scale Drawn by: Kyle Austin

Eastern Analytical, Inc.
professional laboratory and drilling services

Kyle Austin
Clay Point Associates, Inc.
25 Bishop Avenue Suite 2B
Williston , VT 05495

Laboratory Report for:

Eastern Analytical, Inc. ID: 273016
Client Identification: Greensboro Town Offices | 16015
Date Received: 1/19/2024

Enclosed are the analytical results per the Chain of Custody for sample(s) in the referenced project. All analyses were performed in accordance with our QA/QC Program, NELAP and other applicable state requirements. All quality control criteria was within acceptance criteria unless noted on the report pages. Results are for the exclusive use of the client named on this report and will not be released to a third party without consent.

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the written approval of the laboratory.

The following standard abbreviations and conventions apply to all EAI reports:
< : "less than" followed by the reporting limit
> : "greater than" followed by the reporting limit
%R : % Recovery

Certifications:
Eastern Analytical, Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012), New York (12072) and West Virginia (9910C). Please refer to our website at www.easternanalytical.com for a copy of our certificates and accredited parameters.

References:
- EPA 600/4-79-020, 1983
- Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd edition or noted revision year.
- Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- Hach Water Analysis Handbook, 4th edition, 1992
- ASTM International

If you have any questions regarding the results contained within, please feel free to contact customer service. Unless otherwise requested, we will dispose of the sample(s) 6 weeks from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

Lorraine Olashaw, Lab Director — 1.26.24 Date

SAMPLE CONDITIONS PAGE

EAI ID#: **273016**

Client: **Clay Point Associates, Inc.**

Client Designation: **Greensboro Town Offices | 16015**

Temperature upon receipt (°C): 5.4

Acceptable temperature range (°C): 0-6

Received on ice or cold packs (Yes/No): Y

Lab ID	Sample ID	Date Received	Date/Time Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
273016.01	16015-PCB1	1/19/24	1/15/24	solid		Adheres to Sample Acceptance Policy
273016.02	16015-PCB2	1/19/24	1/15/24	solid		Adheres to Sample Acceptance Policy
273016.03	16015-PCB3	1/19/24	1/15/24	solid		Adheres to Sample Acceptance Policy
273016.04	16015-PCB4	1/19/24	1/15/24	solid		Adheres to Sample Acceptance Policy

All results contained in this report relate only to the above listed samples.

Unless otherwise noted:

- *Hold times, preservation, container types, and sample conditions adhered to EPA Protocol.*
- *Solid samples are reported on a dry weight basis, unless otherwise noted. pH/Corrosivity, Flashpoint, Ignitability, Paint Filter, Conductivity and Specific Gravity are always reported on an "as received" basis.*
- *Analysis of pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite were performed at the laboratory outside of the recommended 15 minute hold time.*
- *Samples collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures.*

LABORATORY REPORT

EAI ID#: **273016**

Client: **Clay Point Associates, Inc.**

Client Designation: **Greensboro Town Offices | 16015**

Sample ID:	16015-PCB1	16015-PCB2	16015-PCB3	16015-PCB4
Lab Sample ID:	273016.01	273016.02	273016.03	273016.04
Matrix:	solid	solid	solid	solid
Date Sampled:	1/15/24	1/15/24	1/15/24	1/15/24
Date Received:	1/19/24	1/19/24	1/19/24	1/19/24
% Solid:				
Units:	mg/kg	mg/kg	mg/kg	mg/kg
Date of Extraction/Prep:	1/22/24	1/22/24	1/22/24	1/22/24
Date of Analysis:	1/24/24	1/24/24	1/24/24	1/24/24
Analyst:	MB	MB	MB	MB
Extraction Method:	3540C	3540C	3540C	3540C
Analysis Method:	8082A	8082A	8082A	8082A
Dilution Factor:	44	47	52	50
PCB-1016	< 0.7	< 0.8	< 0.9	< 0.8
PCB-1221	< 0.7	< 0.8	< 0.9	< 0.8
PCB-1232	< 0.7	< 0.8	< 0.9	< 0.8
PCB-1242	< 0.7	< 0.8	< 0.9	< 0.8
PCB-1248	< 0.7	< 0.8	< 0.9	< 0.8
PCB-1254	< 0.7	**9.2**	< 0.9	**31**
PCB-1260	< 0.7	< 0.8	< 0.9	**2.6**
PCB-1262	< 0.7	**3.4**	< 0.9	< 0.8
PCB-1268	< 0.7	< 0.8	< 0.9	< 0.8
TMX (surr)	**91 %R**	**78 %R**	**95 %R**	**90 %R**
DCB (surr)	**101 %R**	**82 %R**	**111 %R**	**101 %R**

Results are reported on a solid as received basis.
Acid clean-up was performed on the samples and associated batch QC.
Detection limits elevated due to sample matrix and in response to the lower initial mass used for analysis.

Deviations from the Report:
16015-PCB4 Parameter: PCB-1254 Date of Analysis: 1/24/2024 Dilution Factor: 200

QC REPORT

EAI ID#: **273016**

Client: **Clay Point Associates, Inc.**

Batch ID: 638415-15580/S012224PCB1

Client Designation: **Greensboro Town Offices | 16015**

Parameter Name	Blank	LCS	LCSD	Analysis Date	Units	Limits	RPD	Method
PCB-1016	< 0.02	0.13 (94 %R)	0.13 (99 %R) (5 RPD)	1/24/2024	mg/kg	40 - 140	30	8082A
PCB-1221	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1232	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1242	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1248	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1254	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1260	< 0.02	0.14 (103 %R)	0.15 (109 %R) (6 RPD)	1/24/2024	mg/kg	40 - 140	30	8082A
PCB-1262	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
PCB-1268	< 0.02	< 0.02 (%R N/A)	< 0.02 (%R N/A) (RPD N/A)	1/24/2024	mg/kg			8082A
TMX (surr)	96 %R	100 %R	104 %R	1/24/2024	% Rec	30 - 150	30	8082A
DCB (surr)	116 %R	114 %R	120 %R	1/24/2024	% Rec	30 - 150	30	8082A

*/! Flagged analyte recoveries deviated from the QA/QC limits. Data that impacts sample results are noted on the sample report.

Page 1 of 1

CHAIN-OF-CUSTODY RECORD

273016

BOLD FIELDS REQUIRED. PLEASE CIRCLE REQUESTED ANALYSIS.

SAMPLE I.D.	SAMPLING DATE/TIME *IF COMPOSITE, INDICATE BOTH START & FINISH DATE/TIME	MATRIX (SEE BELOW)	GRAB/*COMPOSITE	VOC: 524.2; 524.2 MTBE ONLY; 8260; 624; VTICs; 1, 4 DIOXANE; 8021; 8015 GRO; MAVPH	SVOC: 8270; 625; ABN; PAH; EDB; DBCP; TPH8100; L1; L2; 8015 DRO; MAEPH; PEST 608; PCB 608; PEST 8081; PCB 8082; OIL & GREASE 1664; TPH 1664	TCLP: TCLP 1311; ABN; METALS; VOC; PEST; HERB	INORGANICS: BOD; CBOD; TS; TSS; TDS; Ba; Cl; F; SO_4; NO_2; NO_2; NO_3NO_2; TKN; NH_3; TN; T. PHOS.; O. PHOS.; pH; T. RES. CHLORINE; SPEC. CON.; T. ALK.; COD; PHENOLS; TOC; DOC; TOTAL CYANIDE; TOTAL SULFIDE; REACTIVE CYANIDE; REACTIVE SULFIDE; FLASHPOINT; IGNITABILITY	MICRO: TOTAL COLIFORM; FECAL COLIFORM; ENTEROCOCCI; HETEROTROPHIC PLATE COUNT	METALS: DISSOLVED METALS (LIST BELOW); TOTAL METALS (LIST BELOW)	OTHER: PCB	# OF CONTAINERS	NOTES MEOH VIAL #
16015-PCB1	1/15/2024	B								x		
16015-PCB2		B								x		
16015-PCB3		B								x		
16015-PCB4		B								x		

MATRIX: A-AIR; S-SOIL; GW-GROUND WATER; SW-SURFACE WATER; DW-DRINKING WATER; WW-WASTE WATER

PRESERVATIVE: H-HCL; N-HNO_3; S-H_2SO_4; Na-NaOH; M-MEOH

PROJECT MANAGER: Kyle Austin

COMPANY: Clay Point Associates, Inc

ADDRESS: P.O. Box 1254

CITY: Williston STATE: VT ZIP: 05495

PHONE: 802-355-2570 EXT.:

E-MAIL: austin@claypointassociates.com

SITE NAME: Greensboro Town Offices

PROJECT #: 16015

STATE: NH MA ME VT OTHER:

REGULATORY PROGRAM: NPDES: RGP POTW STORMWATER OR GWP, OIL FUND, BROWNFIELD OR OTHER:

QUOTE #: PO #:

QA/QC REPORTING

A B C

MA MCP

TEMP. 5.4 °C

ICE? (YES) NO

REPORTING OPTIONS

PRELIMS: YES OR NO

ELECTRONIC OPTIONS

PDF EXCEL

EQUIS

OTHER

TURN AROUND TIME

24hr* 48hr*

3-4 Days*

5 Day 7 Day

10 Day

*Pre-approval Required

SAMPLER(S): Kyle Austin 908

RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:
Kyle Austin	1/19/2024		Bobbi 1-19-24
Bobbi	1-19-24	1150	NJH
RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:
RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:

METALS: 8 RCRA 13 PP FE, MN PB, CU

OTHER METALS:

SAMPLES FIELD FILTERED? ☐ YES ☐ NO

NOTES: (IE: SPECIAL DETECTION LIMITS, BILLING INFO, IF DIFFERENT)

EPA SW-846
Soxhlet Extraction

SITE HISTORY:

SUSPECTED CONTAMINATION:

FIELD READINGS:

Eastern Analytical, Inc.
professional laboratory and drilling services

51 Antrim Avenue | CONCORD, NH 03301 | TEL: 603.228.0525 | 1.800.287.0525 | E-MAIL: CUSTOMERSERVICE@EASTERNANALYTICAL.COM | WWW.EASTERNANALYTICAL.COM

(WHITE: Lab Copy GREEN: Customer Copy)