BROWNFIELD CLEANUP PLAN

CITY OF MONROE
OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA

ACRES NO. 243049

EPA BROWNFIELDS COOPERATIVE AGREEMENT BF-01F65201-0

PPM PROJECT NO. 11472001/04-CP/04CP

SEPTEMBER 30, 2022

PPM CONSULTANTS

BROWNFIELD CLEANUP PLAN

FOR

FORMER OUACHITA CANDY COMPANY
211-305 WALNUT STREET
MONROE, LOUISIANA

PREPARED FOR:

CITY OF MONROE
700 WASHINGTON STREET
MONROE, LOUISIANA 71201

PPM PROJECT NO. 11472001/04-CP/04CP

SEPTEMBER 30, 2022

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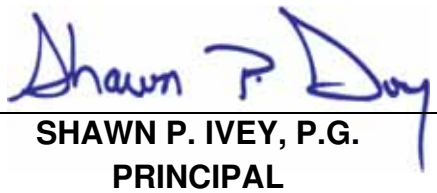

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1.0 INTRODUCTION

PPM Consultants, Inc. (PPM) was retained by the City of Monroe to develop a cleanup plan (CP) to address contaminants of concern (COCs) identified in the former Ouachita Candy Company facility located at 211-305 Walnut Street in Monroe, Louisiana. The purpose of the CP is to abate asbestos in buildings on the property.

1.1 SITE LOCATION AND DESCRIPTION

The former Ouachita Candy Company site [Assessment, Cleanup, and Redevelopment Exchange System (ACRES) No. 243049] is located at 211-305 Walnut Street in Monroe, Louisiana. The property includes five parcels under the ownership of two companies and encompasses approximately 3.3 acres of area and is located in Township 18 North and Range 3 East of the Monroe North Quadrangle (1994) United States Geological Survey (USGS) 7.5-minute Topographic Map. More specifically, the site is located at 32°30'10.52" North latitude and 92°07'9.92" West longitude. Site location is depicted in **Figure 1, Site Location Map** and **Figure 2, Site Map** in **Appendix A, Figures**.

The subject property includes three structures currently used for personal storage. The structures on the property are divided into several areas including:

- The northern structure (Building 1) is a vacant single-story warehouse with a service bay on the western end of the building. Building 1 is currently used for personal storage with two office areas. A covered alley is also a part of Building 1.
- The central building (Building 2) includes personal storage, an office area and a breakroom on the ground floor. A bottling area and storage area related to the previous use of the facility as a Coca-Cola producer and distributor are located on the second floor. Two chain-driven freight elevators are also located in Building 2.
- The southern building (Building 3) includes personal storage, an office area, and electrical equipment on the ground floor. The second floor includes equipment related to the former operation of the building as a Coca-Cola producer and distributor. Building 3 also includes a chain-driven elevator.

1.1.1 Previous Land Use

The earliest available record for the subject property dated back to 1880 with the construction of the Western Star Masonic Temple on the southern portion of the subject

property, as listed in a fire insurance map. The subject property included residences and the Masonic Temple from at least 1890 to at least 1920. The central portion of the site was also developed with a wood working facility in 1886. The northern portion of the site continued to be residential until at least 1926. During the early 1920s, the southern and central portions of the subject property were developed with the Biedenharn building, including the Ouachita Candy Company and Coca Cola Bottling Company operations and warehousing space. The northern portion of the site was commercially developed between 1926 and 1932 with an automotive repair facility with filling station with vehicle washing and vehicle greasing operations. The vehicle maintenance area was incorporated into the use of the Ouachita Candy Company for truck fleet maintenance and stopped operating circa 1968 when the Coca Cola Bottling Company operations moved. The northern portion of the site was operated as a storage warehouse until at least 1986. The subject property has operated as personal storage since at least 1996 with the closure of Ouachita Candy Company.

1.1.2 Current Land Use

The subject property has been used for storage since 2010.

1.1.3 Future Land Use

Due to the historical significance of the site, the former Ouachita Candy Company facility is proposed to be redeveloped into a commercial/retail space.

1.1.4 Surrounding Land Use

Adjoining properties to the ROW access include a vacant lot to the north, North Louisiana Children's Museum to the east, and a vacant lot to the west. Adjoining properties for the former Ouachita Candy Company include the North Louisiana Children's Museum to the northwest, a parking garage, Revival Design and Consign, the Monroe Chamber of Commerce to the east, a parking lot to the southeast, Miro's restaurant to the south and the Ouachita River to the west.

1.2 ENVIRONMENTAL SITE ASSESSMENT (ESA) HISTORY

1.2.1 Phase I Environmental Site Assessment – June 10, 2020

A Phase I Environmental Site Assessment (ESA) was conducted by PPM on June 10, 2020, in order to identify environmental concerns on or affecting the former Ouachita Candy Company site. The report listed the following recognized environmental conditions (REC):

- **Historical and current uses of the property.**
  - Former filling station- The 1932 Sanborn Fire Insurance Map illustrates the northeastern corner of the subject property as a filling station with two gas tanks. The 1950 Fire Insurance Map incorporates the filling station as part of the adjoining automotive repair portion of the structure and does not show fuel underground storage tanks (USTs) on the site. Louisiana did not require the registration of USTs until 1986 and would not have required UST closure sampling for USTs closed prior to 1950. No available regulatory information is available for the filling station or fuel USTs on the subject property. The condition of the USTs on the site is not known and it is possible the tanks are still present. The area illustrated as a filling station is currently incorporated as part of the storage area in the warehouse on the subject property and represents a vapor intrusion threat. The use of the subject property as a filling station in 1932 with fuel USTs is considered to represent a REC.
  - Former vehicle repair- The northern portion of the subject property is illustrated as car washing and greasing automotive repair facility in the 1932 Fire Insurance Map. The northern portion of the site was used as a garage for vehicles associated with the Coca Cola Bottling Company and Ouachita Candy Company until at least 1970. A specific activity involving petroleum products was "greasing" as notated on the northwest corner of the property by the 1932 and 1950 Sanborn Maps. A hazardous waste activity form was completed by HT Development in 2000 after locating and disposing of various drums of used oil and filters from an abandoned maintenance shop. Additionally, unknown drums were also identified in 2000 and disposed of offsite containing flammable contents. The 2000 Hazardous Waste Generator Form does not include any references to releases or subsurface investigation and notes that the facility had been unused for approximately 30 years. PPM did not observe any obvious areas of release; however, automotive repair activities from at least 1932, to at least 1970 predate procedures for the proper handling and disposal of hazardous substance and petroleum products. Improper handling of hazardous substances by current

standards may have occurred in this area, leading to the impact of site soils or groundwater from solvents, oils, or paints. PPM considers the use of the northern portion of the subject property for vehicle repair to represent a REC.

- Waterway loading- The western portion of the site in the 1926 Fire Insurance Map includes the use of an incline conveyor belt, carbide warehouse, and coal bin along the eastern slope of the Ouachita River. The loading on the western portion of the subject property would have included manufactured goods along with goods stored in the warehouses of the Monroe Transfer and Warehouse Company, LA Paper Company, American Railway Express, and Ouachita Candy Company. It is not known if the goods stored in the warehouse are from the subject property in the 1926 and 1932 maps, or included the storage of hazardous substance containers. The presence of an electric motor and coal bin along the western boundary of the site does not eliminate the possibility that the engine may have been driven by a petroleum fuel system that would have required an UST or aboveground storage tank (AST). Based on the risks posed by a fuel storage system and the possibility of the transport or disposal of hazardous substance via the loading dock on the western boundary of the site, PPM considers the waterway loading, from at least 1926 to at least 1932, to represent a REC.
- Former UST- Louisiana Department of Environmental Quality (LDEQ) records include the documented removal of one 550-gallon gasoline UST from a tank pit on the western portion of the subject property in August 7, 1992, with one closure soil sample below laboratory detection limits for benzene, toluene, ethylbenzene and xylenes (BTEX). The 1992 closure sampling did not include total petroleum hydrocarbons – gasoline range organics (TPH-G) sampling or sampling for groundwater at the time of closure. Based on the lack of groundwater sampling and the lack of testing for all parameters associated with gasoline USTs, PPM considers the former UST on the western portion of the subject property to represent a REC.

- **Historical and current surrounding land uses.**
  - Former vehicle repair stations- The adjoining properties at 212 Walnut Street and 300 Walnut Street were historically utilized as automotive repair facility from at least 1926 to at least 1950. The adjoining property to the north at 225 Walnut Street (currently 309 Walnut Street) operated as automotive repair facility from at least 1932 to at least 1950 within a structure adjoining the north side of the subject property boundary. The facility at 109 Washington Street or 300 Walnut

Street included a gas tank illustrated approximately 160 feet east of the subject property along Washington Street. The assumed groundwater flow in this area is to the southeast, placing the subject property downgradient to the automotive repair facilities. Louisiana did not require the registration of the USTs until 1986 and a facility that closed prior to 1986 would not include UST closure sampling, or listed UST information. It is not known if the UST at the 109 Washington Street facility is currently present at the former repair shop property. No LDEQ records are available discussing the use of the automotive repair shops on the adjoining property. Based on the 25+ years of automotive service, the use of hazardous substances and petroleum products prior to the promulgation of Resource Conservation and Recovery Act (RCRA) standards, the proximity of the automotive repair facilities to the subject property, the unknown condition of the UST at 109 Washington Street, and the groundwater flow toward the subject property, PPM considers the repair shops on the adjoining properties at 212 and 300 Walnut Street to represent RECs.

- F. Strauss and Son Wholesale Produce USTs- The 1926, 1932 and 1950 Fire Insurance Maps illustrate three fuel USTs at the F. Strauss and Son Wholesale Produce facility at 313 Walnut Street. The USTs vary from approximately 80 feet to approximately 140 feet north of the subject property boundary. The USTs are not illustrated in the 1970 Fire Insurance Maps and no information on the USTs are available from the LDEQ database. If the USTs were closed prior to 1986, the USTs would not have been registered and UST closure would not have included soil or groundwater sampling. Groundwater in the area is assumed to flow to the southwest, toward the subject property. Due to the unknown condition of the USTs, the lack of soil sampling in the area, and the groundwater flow to the south-southeast toward the subject property, PPM considers the USTs at the F. Struss and Son facility from at least 1926 to at least 1950 to represent a REC.

- Ouachita Candy Company USTs- The parking lot on the adjoining property to the south was previously part of the Ouachita Candy Company operation, including the fuel USTs in two UST pits approximately 20 feet south of the subject property boundary and approximately 52 feet south of the subject property boundary. One 500-gallon UST was removed from the Ouachita Candy Company parking lot in 1992 with soil testing below the LDEQ Standards. The UST removed in 1989 appears to be in a similar location to the UST illustrated in the 1950 Fire Insurance Map with the automotive parking area. A second UST was removed from the eastern portion of the parking lot approximately 20 feet

south of the subject property boundary in 1996. The 1996 tank removal appears to be in a similar location to the UST illustrated near the southeastern corner of the subject property in 1932 and 1950 Fire Insurance Maps. Laboratory analysis of the soil samples collected during UST closure in 1996 suggested that the product in the UST was a type of petroleum solvent, mineral spirit, or kerosene. At the time of the release, the parking lot on the adjoining property to the south was part of the Ouachita Candy Company facility. The 1997 Site Investigation (SI) Report states that MW-1, the closest groundwater monitoring well to the subject property had no detectable levels of BTEX or TPH-G. According to the No Further Action (NFA), the area of investigation was closed in accordance with the UST Cleanup Level MATRIX using Cleanup Level 3 Standards [the MATRIX Standards predate the current Risk Evaluation/Corrective Action Program (RECAP) Standards]. Subsurface investigative activities, along with all remediation and monitoring activities, were relegated to the parking lot parcel. The groundwater laboratory results were below UST MATRIX standards for four consecutive quarters by 2002, however remaining concentrations in soil restricted site use to industrial usage. Since the release occurred prior to the creation of the current RECAP Standards, the 1996 UST release was evaluated under the MATRIX Standards. The associated 2006 Conveyance Notice filed with the Ouachita Parish Courthouse identifies the Area of Investigation (AOI) as Ouachita Candy Company at 215 Walnut Street with a site map that illustrates the adjoining parking lot. During research for this facility, PPM was unable to identify the extent of the Application of Use restriction and therefore unable to identify the application of the MATRIX Soil Closure Standards. The 2006 NFA document also includes a site map for groundwater plume delineation across the investigative area known as the Ouachita Candy Company. The plume illustration in the 2006 NFA indicates that the extent of hydrocarbon impact to the groundwater was not delineated toward the north, with illustrated and assumed groundwater contamination on the current subject property that may exceed RECAP Standards. Mr. Loup of LDEQ explained that the Conveyance Notice Use Restriction was required for the area of investigation and should be associated with the release area in the parking lot. He stated that the release was closed under MATRIX Standards and that if soil or groundwater samples collected on the subject property exceeded RECAP Standards, then the previous Cleanup Standards for the release and the removal of the tanks, would be taken into consideration by LDEQ when deciding if further evaluation is necessary. It is LDEQ department policy to not reopen remediation cases that have been closed under previous standards unless new information presents a threat to the

environment. Remediation guidelines under the MATRIX Standards did not evaluate sites for vapor intrusion into enclosed structures and did not include delineation or subsurface investigative activities on the subject property. Based on the risk of vapor intrusion to the structure on the subject property, the lack of delineation or subsurface investigation of the subject property, and the risk of soil or groundwater impact above RECAP Screening Standards on the subject property, the former Ouachita Candy Company USTs on the adjoining parking lot property are considered to represent a REC.

1.2.2 Phase II Environmental Site Assessment and Asbestos-Containing Materials Survey – June 2021 through July 2021.

A Phase II ESA was conducted by PPM, and an asbestos-containing materials (ACM) survey was conducted by PAC Environmental Specialists (PPM's subcontractor). PPM field work was conducted from June 8, 2021, through June 17, 2021, and the Phase II ESA report was completed on July 21, 2021. The ACM survey was conducted from June 15, 2021, through June 29, 2021, and the report was completed on July 8, 2021. PPM's Phase II ESA portion of this project was conducted in order to identify soil and/or groundwater contamination associated with RECs identified in the June 2020 Phase I ESA for the site. The scope of work for the Phase II ESA consisted of the following:

- Call "One Call" to locate and mark underground utility lines three days prior to start of fieldwork.
- Advancement of six probe borings to a maximum of 20.0 feet below ground surface (BGS), utilizing a Geoprobe® truck-mounted rig.
- Collection of soil samples at continuous 2-foot intervals from each of the probe borings for field screening and possible laboratory analysis.
- Field screening conducted using headspace analysis techniques with a Photo-Ionization Detector (PID) and visual inspection of soil samples. A sample from each interval retained at 4°C for possible laboratory analysis.
- Analysis of soil and groundwater samples collected from probe borings P-1 and P-2 for BTEX, TPH-G, total petroleum hydrocarbons – diesel range organics (TPH-D), and total petroleum hydrocarbons – oil range organics (TPH-O), and polycyclic aromatic hydrocarbons (PAH).
- Analysis of soil and groundwater samples collected from probe boring P-3 for BTEX, TPH-G, TPH-D, TPH-O, PAH and the eight RCRA Metals.

- Analysis of soil and groundwater samples collected from probe borings P-4 and P-6 for BTEX, TPH-G and TPH-D.
- Analysis of soil and groundwater samples collected from probe boring P-5 for BTEX and TPH-G.
- Analysis of the highest concentration of each constituent in soil samples collected from 0 to 15 feet and greater than 15 for Synthetic Precipitation Leaching Procedure (SPLP) for BTEX, TPH-G, TPH-D, TPH-O, PAH and RCRA Metals.
- Collection of one soil sample for analysis of Toxicity Characteristic Leaching Procedure (TCLP) and Reactive Cyanide, Reactive Sulfide, Ignitability, Corrosivity (RCI) for landfill profile of soil cuttings.
- Collection of quality assurance/quality control (QA/QC) samples per the EPA-approved generic Quality Assurance Project Plan (QAPP).
- Installation of six temporary probe wells, one in each probe boring, to aid in the collection of groundwater samples from the temporary wells.
- Collection of one groundwater sample from temporary wells TW-1 and TW-2 for laboratory analysis of BTEX, TPH-G, TPH-D, TPH-O and PAH.
- Collection of one groundwater sample from temporary well TW-3 for laboratory analysis of BTEX, TPH-G, TPH-D, TPH-O, PAH and RCRA Metals.
- Collection of one groundwater sample from temporary wells TW-4 and TW-6 for laboratory analysis of for BTEX, TPH-G and TPH-D.
- Collection of one groundwater sample from temporary well TW-5 for laboratory analysis of for BTEX and TPH-G.
- Disposal of soil cuttings at a permitted landfill.
- Conduct a survey to determine if ACM are present in the on-site building.
- Preparation of a Phase II ESA Report for the site presenting the scope of work, site background, investigative methodology, findings and conclusions from the Phase II ESA field activities.

PPM retained PAC Environmental Specialists, a Louisiana-licensed asbestos inspector, to conduct an asbestos survey of the subject property, as required by EPA regulation 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAP) prior to demolition or renovation. The asbestos inspector conducted a visual assessment of the building to identify materials suspected of containing asbestos (suspect ACM) such as

thermal system insulation, surfacing materials and miscellaneous materials (e.g., floor tiles). Suspect materials were physically assessed for friability and evidence of damage or degradation. Samples of suspect ACM were collected for laboratory analysis. Bulk sample collections were conducted in general accordance with the sampling protocols outlined in USEPA 40 CFR 763.86. Samples were collected from each homogenous area of the structure to identify the presence of ACM. The samples collected were analyzed for asbestos content by Polarized Light Microscopy (PLM), using the "Interim Method of the Determination of Asbestos in Bulk Insulation Samples". Laboratory Analysis was performed by Eurofins/CEI Labs in accordance with US EPA and LDEQ accreditation requirements and methodologies.

Deviations from the original scope of work were as follows:

- Locations of P-1/TW-1 and P-2/TW-2 were shifted south 15 feet from their proposed locations due to refusal at 8 feet BGS.
- Soil borings were advanced to a maximum depth of 25 feet BGS due to insufficient groundwater recharge at a maximum depth of 20 feet BGS.
- Due to unsafe conditions in portions of the building, and inaccessibility to the roof, asbestos samples were not collected in parts of the building.

Findings and conclusions from the July 2021 Phase II ESA and ACM Survey were as follows:

- **Subsurface Investigation Findings and Conclusions.**
  - Laboratory analysis of soil samples collected revealed that constituent concentrations in all soil samples were below the LDEQ RECAP Soil Screening Standards.
  - Laboratory analysis of groundwater samples revealed that constituent concentrations in all groundwater samples were below the LDEQ RECAP Groundwater Screening Standards with the exception of TPH-D and benzo(a)-pyrene. However, subsequent to conducting a Management Option 1 (MO-1) RECAP evaluation, all contaminants of concern (COC) in groundwater were below the RECAP Standards.
- **ACM Survey Findings and Conclusions.** According to the analytical results, 11 of the 44 samples collected were identified to contain asbestos. This conclusion is based on the EPA definition of an ACM as material composed of "…greater than 1% asbestos." The identified ACMs are as follows:

- **Brown Floor Tile & Black Mastic (B2-01)**. This material, which is located in Building 2, was determined to contain 5 percent and 3 percent chrysotile asbestos, respectively.
- **Green Sheet Flooring & Yellow Mastic (B2-02)**. This material, which is located in Building 2, was determined to contain 25 percent and 3 percent chrysotile asbestos, respectively.
- **Adhesive (B2-04 B)**. This material, which is located in Building 2, was determined to contain 3 percent chrysotile asbestos.
- **White HVAC Insulation (B3-03 Layer 1)**. This material, which is located in Building 3, was determined to contain 65 percent chrysotile asbestos.
- **Cream Texture (B3-08 Layer 1)**. This material, which is located in Building 3, was determined to contain 2 percent chrysotile asbestos.
- **Green Floor Tile & Black Mastic (B-3-09)**. This material, which is located in Building 3, was determined to contain 5 percent and 3 percent chrysotile asbestos, respectively.
- **Dark Brown Floor Tile (B3-10 A)**. This material, which is located in Building 3, was determined to contain 3 percent chrysotile asbestos.
- **Brown Mastic (B3-12 B)**. This material, which is located in Building 3, was determined to contain 5 percent chrysotile asbestos.
- **HVAC Insulation and Components**. Although they were not sampled, all HVA insulation and associated components are Presumed Asbestos-Containing Building Materials (PACM).

Based on results from the Phase II ESA and ACM Survey, PPM recommended that the owner/operator of the property notify the LDEQ that constituent concentrations in groundwater exceed RECAP Screening Standards. Since all concentrations in soil and groundwater are below the applicable MO1 Standards, LDEQ will likely not require any additional actions at the site.

Additionally, PAC Environmental Specialists recommended that prior to demolition or renovation activities to the buildings, the LDEQ must be notified via LDEQ Form AAC-2.

1.2.3 Asbestos-Containing Materials & Lead-Based Paint Survey – September 13, 2021

ALTEC Environmental Consulting, LLC (ALTEC) conducted Asbestos & Lead Sampling and presented their results in a report dated September 3, 2021. Two samples of Red 9x9 Floor Tile (CM-21-244) were collected. Sample results revealed that the red 9x9 floor tile, which is located in the covered alley portion of Building 1, contains 8% chrysotile asbestos. For the lead-based paint (LBP) survey, there were 36 sample locations with at least six samples taken from each of the buildings surveyed. All samples collected were below the U.S. Department of Housing and Urban Development (HUD) level of 1.0 milligrams per square centimeter (mg/cm^2) and are therefore not considered to be LBP.

1.2.4 Phase I Environmental Site Assessment – September 21, 2021

An updated/new Phase I ESA was conducted by PPM on September 21, 2021, in order to identify environmental concerns on or affecting the former Ouachita Candy Company site – following Phase II ESA findings. The updated Phase I ESA revealed no evidence of RECs in connection with the property. RECs identified in the June 2020 Phase I ESA were ruled out based on the following reasoning and updated information:

- **Former filling station.** The 1932 Sanborn Fire Insurance Map illustrates the northeastern corner of the subject property as a filling station with two gas tanks. The 1950 Fire Insurance Map incorporates the filling station as part of the adjoining automotive repair portion of the structure and does not show the fuel USTs on the site. Louisiana did not require the registration of USTs until 1986 and would not have required UST closure sampling for UST closed prior to 1950. No available regulatory information is available for the filling station or fuel USTs on the subject property. The condition of the USTs on the site is not known and it is possible the tanks are still present. The area illustrated as a filling station is currently incorporated as part of the storage area in the warehouse on the subject property and represent a vapor intrusion threat. PPM sampled soil and groundwater in probe borings P-1 and P-2 during a 2021 Phase II ESA in order to assess possible soil and groundwater impacts from the former filling station on the subject property. The Phase II ESA found all sampled concentrations in soil to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe boring P-2 and laboratory testing minimums above LDEQ screening standards for benzo-(a)-pyrene in groundwater samples for probe borings P-1 and P-2. However, further evaluation of the sampling

results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a no further interest (NFI) letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former filling station to represent a REC.

- **Former vehicle repair.** The northern portion of the subject property is illustrated as car washing and greasing automotive repair facility in the 1932 Fire Insurance Map. The northern portion of the site was used as a garage for vehicles associated with the Coca Cola Bottling Company and Ouachita Candy Company until at least 1970. A specific activity involving petroleum products was "greasing" as notated on the northwest corner of the property by the 1932 and 1950 Sanborn Maps. A Hazardous Waste Activity Form was completed by HT Development in 2000 after locating and disposing of various drums of used oil and filters from an abandoned maintenance shop. Additionally, drums containing flammable contents were identified in 2000 and disposed of offsite. The 2000 Hazardous Waste Generator Form does not include any references to releases of subsurface investigation and notes that the facility had been unused for approximately 30 years. PPM did not observe any obvious areas of release; however, automotive repair activities from at least 1932 to at least 1970 predate procedures for the proper handling and disposal of hazardous substance and petroleum products. Improper handling of hazardous substances by current standards may have occurred in this area, leading to impact of site soils or groundwater from solvents, oils, or paints. PPM sampled soil and groundwater in probe boring P-3 during a 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former automotive repair activities on the subject property. The Phase II ESA found all sampled concentrations in soil to be below LDEQ screening standards in this location. The 2021 Phase II ESA identified laboratory testing minimums above LDEQ screening standards for TPH-D and benzo-(a)-pyrene in the groundwater sample collected from probe boring P-3. Further evaluation of the sampling results under LDEQ RECAP confirmed the TPH-D and benzo-(a)-pyrene concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter PPM does not consider the former automotive repair activities to represent a REC.
- **Waterway loading**. The western portion of the site in the 1926 Fire Insurance Map include the use of an incline conveyor belt, carbide warehouse and coal bin along the

eastern slope of the Ouachita River. The loading on the western portion of the subject property would have included manufactured goods along with goods stored in the warehouses of the Monroe Transfer and Warehouse Company, LA Paper Company, American Railway Express, and Ouachita Candy Company. It is not known if the goods stored in the warehousing area of the subject property in the 1926 and 1932 maps included the storage of hazardous substance containers. The presence of an electric motor and coal bin along the western boundary of the site does not eliminate the possibility that the engine may have been driven by a petroleum fuel system that would have required a UST or AST. PPM sampled soil and groundwater in probe boring P-4 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the water way loading area on the subject property. The Phase II ESA revealed all concentrations in soil and groundwater samples were below LDEQ screening standards in this location. Therefore, based on the findings of the Phase II ESA, PPM does not consider the waterway loading area to represent a REC.

- **Former UST**. LDEQ records include the documented removal of one 550-gallon gasoline UST from a tank pit on the western portion of the subject property on August 7, 1992, with the one closure soil sample below laboratory detection limits for BTEX. The 1992 closure sampling did not include TPH-G sampling or sampling for groundwater at the time of closure. PPM sampled soil and groundwater in probe boring P-5 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former UST on the subject property. The Phase II ESA found all concentrations in soil and groundwater samples to be below LDEQ screening standards in this location. Therefore, based on the findings of the Phase II ESA PPM does not consider the former UST to represent a REC.
- **Historical and current surrounding land uses.**
  - **Former vehicle repair stations.** The adjoining properties at 212 Walnut Street and 300 Walnut Street were historically utilized as automotive repair facilities from at least 1926 to at least 1950. The adjoining property to the north at 225 Walnut Street (currently 309 Walnut Street) operated as an automotive repair facility from at least 1932 to at least 1950 within a structure adjoining the northern side of the subject property. The facility at 109 Washington Street or 300 Walnut Street included a gas tank illustrated approximately 160 feet east of the subject property along Washington Street. The assumed groundwater flow in this area is to the southwest, placing the subject property down-gradient to the automotive repair facilities. Louisiana did not require the registration of USTs until 1986, and a facility that closed

prior to 1986 would not include UST closure sampling or listed UST information. It is not known if the UST at the 109 Washington Street facility is currently present at the former repair shop property. No LDEQ records are available discussing the use of the automotive repair shops on the adjoining property. PPM sampled soil and groundwater in probe borings P-1, P-2 and P-3 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former automotive repair facilities and USTs on adjoining properties. The Phase II ESA found all concentrations in soil samples to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe borings P-2 and P-3 and laboratory testing minimums above LDEQ screening standards for benzo(a)-pyrene in groundwater samples for probe borings P-1, P-2 and P-3. However, further evaluation of the sampling results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II ESA findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former automotive repair and USTs on the adjoining properties to represent a REC.

- **F. Strauss and Son USTs.** The 1926, 1932 and 1950 Fire Insurance Maps illustrate three fuel USTs at the F. Strauss and Son Wholesale Produce facility at 313 Walnut Street. The USTs vary from approximately 80 feet to approximately 140 feet north of the subject property boundary. The USTs are not illustrated in the 1970 Fire Insurance Maps, and no information about the USTs is available from the LDEQ database. If the USTs were closed prior to 1986, the USTs would not have been registered and UST closure would not have included soil or groundwater sampling. Groundwater in the area is assumed to flow to the southwest, toward the subject property. PPM sampled soil and groundwater in probe borings P-1, P-2 and P-3 during the 2021 Phase II ESA in order to address the possible soil and groundwater impacts from the F Strauss and Son USTs on the adjoining property. The Phase II ESA found all concentrations in soil samples to be below LDEQ screening standards in these locations. The 2021 Phase II ESA identified elevated concentrations of TPH-D in groundwater samples from probe borings P-2 and P-3 and laboratory testing minimums above LDEQ screening standards for benzo(a)-pyrene in groundwater samples for probe borings

P-1, P-2 and P-3. However, further evaluation of the sampling results under LDEQ RECAP confirmed all concentrations in groundwater were below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II findings on the subject property. Therefore, based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the F Strauss and Son USTs on the adjoining properties to represent a REC.

- **Ouachita Candy Company USTs.** The parking lot on the southern adjoining property was previously part of the Ouachita Candy Company operation, including the fuel USTs in two UST pits approximately 20 feet south of the subject property boundary and approximately 52 feet south of the subject property boundary. One 500-gallon UST was removed from the Ouachita Candy Company parking lot in 1992 with soil sample concentrations below LDEQ Standards. This UST removed in 1989 appears to be in a similar location to the UST illustrated in the 1950 Fire Insurance Map with the automotive parking area. A second UST was removed from the eastern portion of the parking lot approximately 20 feet south of the subject property boundary in 1996. The 1996 tank removal appears to be in a similar location to the UST illustrated near the southeastern corner of the subject property in 1932 and 1950 Fire Insurance Maps. Laboratory analysis of the soil samples collected during UST closure in 1996 suggested that the product in the UST was a type of petroleum solvent, mineral spirit, or kerosene. At the time of the release, the parking lot on the adjoining property to the south was part of the Ouachita Candy Company facility. The 1997 SI report states that MW-1, the closest groundwater monitoring well to the subject property had no detectable levels of BTEX or TPH-G. According to the NFA, the area of investigation was closed in accordance with the UST Cleanup Level MATRIX using Cleanup Level 3 Standards (the MATRIX Standards predate the current RECAP Standards). Subsurface investigative activities, along with all remediation and monitoring activities were relegated to the parking lot parcel. The groundwater laboratory results were below UST MATRIX Standards for four consecutive quarters by 2002, however remaining concentrations in soil restricted site use to industrial usage. Since the release occurred prior to the creation of the current RECAP Standards, the 1996 UST release was evaluated under the MATRIX Standards. The associated 2006 conveyance notice filed with the Ouachita Parish courthouse identifies the AOI as Ouachita Candy company at 215 Walnut street with a site map that

illustrates the adjoining parking lot. During research for this facility, PPM was unable to identify the extent of the application of the use restriction and therefore unable to identify the application of the MATRIX Soil Closure Standards. The 2006 NFA document also includes a site map for groundwater plume delineation across the investigative area known as the Ouachita Candy Company. The plume illustration in the 2006 NFA indicates that the extent of hydrocarbon impact to the groundwater was not delineated toward the north, with illustrated and assumed groundwater contamination on the current subject property that may exceed RECAP Standards. Mr. Loup of LDEQ explained that the Conveyance Notice use restriction was required for the AOI and should be associated with the release area in the parking lot. He stated that the release was closed under MATRIX Standards and that if soil or groundwater samples collected on the subject property exceeded RECAP Standards, then the previous cleanup standards for the release and the removal of the tanks would be taken into consideration by LDEQ when deciding if further evaluation is necessary. It is LDEQ department policy to not reopen remediation cases that had been closed under previous standards unless new information presents a threat to the environment. Remediation guidelines under the MATRIX Standards did not evaluate sites for vapor intrusion into enclosed structures and did not include delineation or subsurface investigative activities on the subject property. PPM sampled soil and groundwater in probe boring P-6 during the 2021 Phase II ESA in order to assess the possible soil and groundwater impacts from the former USTs on the adjoining property. The Phase II ESA found all concentrations in the soil sample to be below LDEQ screening standards in this location. The 2021 Phase II ESA identified an elevated concentration of TPH-D in the groundwater samples collected from probe boring P-6. However, further evaluation of the sampling results under LDEQ RECAP confirmed the concentration in groundwater was below LDEQ RECAP MO-1 for the subject property. PPM was informed by LDEQ that a NFI letter would be issued for the Phase II findings on the subject property. Based on the findings of the Phase II ESA and the anticipated issuing of a NFI letter, PPM does not consider the former USTs on the adjoining property to represent a REC.

Following the completion of the Phase I ESA (dated September 21, 2021), LDEQ issued a NFI Letter on October 18, 2021.

1.3 EXPOSURE PATHWAYS OF CONCERN

ACM is a concern because asbestos minerals have a tendency to separate into microscopic-size particles that can remain in the air and be inhaled. Persons occupationally exposed to asbestos have developed several types of life-threatening diseases, including asbestosis and lung cancer. Although the use of asbestos and asbestos products has dramatically decreased, they are still found in many residential and commercial settings and continue to pose a health risk to workers and occupants. Identified ACM in the main building was non-friable, which means that it does not pose an immediate threat to the surrounding environment or public. However, because the City hopes to either renovate or demolish the main building on the subject property, asbestos abatement will be necessary before such activities can occur because renovation and/or demolition activities can cause non-friable ACM to become friable. Should ACM become friable, risk pathways would include: ingestion, and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers. However, the greatest threat would be to construction workers during renovation and abatement activities, which potentially pose an exposure risk through inhalation, ingestion and contact unless proper personal protective equipment (PPE) is utilized.

1.4 ENGINEERING ANALYSIS FOR UNSAFE SELECTIVE DEMOLITION AREAS

Prior to accepting bids for asbestos abatement, an engineering analysis that supports a decision to demolish a structure in order to address the contamination should be completed. Only demolition that is necessary to address site contamination is an eligible and allowable cost under the EPA Cleanup Grant Guidelines and the LDEQ Brownfield RLF criteria. The engineering analysis should compare the cost and effectiveness of the available options (e.g., demolition vs. in situ remediation) and should include an evaluation of unusual circumstances in which partial demolition of a structure may be necessary. In this case, the second floor of the building is structurally unsound and abatement in these areas pose an unreasonable health and safety threat to any asbestos abatement workers. Selective demolition of these areas should be considered. Selective demolition in these areas will result in an increase in the amount of materials and debris that would require special handling and disposal as material contaminated by ACM. The engineering analysis will be useful in determining the extent of contamination resulting from the selective demolition in these unsafe areas.

1.5 SCOPE OF WORK

The scope of work for this CP includes proper abatement and disposal of identified and presumed ACM in buildings.

2.0 REMEDIAL IMPLEMENTATION

2.1 REGULATORY REQUIREMENTS

In accordance with the NESHAP, 40 CFR Part 61, Subpart M, Regulated Asbestos-Containing Material (RACM) is required to be removed prior to renovations that would disturb the asbestos containing materials. The State of Louisiana has established Chapter 27 of Louisiana Administrative Code (LAC 33:III Chapter 27) to regulate the identification, management, and abatement of ACM in schools and state buildings; and while the former Ouachita Candy Company buildings are not anticipated to be reused as a school or state building, it is considered good practice to consider these requirements to ensure protection of health, safety and the environment. All asbestos-related activity must be conducted by an individual or company accredited by the State of Louisiana, through the LDEQ. An asbestos-related activity consists of the disturbance (whether intentional or unintentional) or abatement of ACM, the performance of asbestos surveys, the development of management plans and response actions, asbestos project design, the collection or analysis of asbestos samples, monitoring for airborne asbestos or any other activity required to be accredited under LDEQ Chapter 27 Appendix A.

In non-state, non-school buildings, the State of Louisiana sets forth emission standards for asbestos under Chapter 51 (LAC 33:III Chapter 51). Per Chapter 51 Section P, the following activities, when conducted, must be performed by accredited individuals: asbestos surveys, asbestos abatement, and monitoring for airborne asbestos.

Prior to renovations or demolitions, LDEQ requires a (1) NOTIFICATION OF DEMOLITION AND RENOVATION AND ASBESTOS CONTAMINATED DEBRIS ACTIVITY FORM [AAC-2(a)], or (2) ASBESTOS NOTIFICATION OF RENOVATION AND/OR DEMOLITION NEGATIVE DECLARATION FORM [AAC-2(b)].

The AAC-2(a) form is required when requesting Asbestos Disposal Verification Forms (ADVF) for Asbestos Contaminated Debris Activities (ACDA), Demolition, Renovation, and/or Response Action projects where RACM is present, or assumed to be present, above

the established thresholds, when greater than 3 linear or 3 square feet of ACM is stripped, dislodged, cut, drilled, or similarly disturbed in a school or state building, or as otherwise required by LAC 33:III.5151.F.1. To track and substantiate the proper disposition of asbestos at a Recognized Asbestos Landfill (RAL), waste shipment records, referred to as ADVFs, are required to be originated and signed by the waste generator or the owner or operator of a demolition, or renovation, response action or asbestos-contaminated debris (ACD) activity.

2.2 CLEANUP STANDARDS

Even though cancer risks from exposure to asbestos are most appropriately viewed as chronic concerns, short-term standards have been established by OSHA to limit exposures of workers in the workplace. There are two types of short-term limits, as follows:

- Short-term Exposure Limit (STEL): 1.0 fibers per cubic centimeters as detected using phase-contract microscopy (PCM fcc/cc)
- Eight-hour Time-Weighted Average (TWA) Permissible Exposure Limit (PEL)]: 0.1 PCM f/cc

EPA Asbestos Hazard Emergency Response Act (AHERA) regulations, (40 CFR 763) require aggressive clearance sampling after asbestos abatement activity. Leaf blowers and fans are used to disturb interior air and air samples are collected according to the standard method set forth in Appendix A of Subpart E of 40 CFR Part 763. The clearance criteria as set forth in this regulation are:

- PCM clearance criteria (for small areas): 0.01 f/cc
- Transmission Electron Microscopy (TEM) clearance criteria: 70 structures per square millimeter on the filter, or no significant increase from exterior air sample results

Although AHERA regulations apply to abatement in schools, the same standards are generally used for commercial abatement projects and are recommended to be followed on this project.

2.3 ACM ABATEMENT ACTIVITIES

Asbestos abatement will be completed by a State of Louisiana-licensed asbestos abatement contractor. The asbestos workers and supervisors for the project will have appropriate licensure and meet the requirements set forth by the LDEQ. The abatement contractor will

be responsible for the removal, transport, and disposal of the identified ACMs. Locations and estimated quantities of ACMs identified at the former Ouachita Candy Company site are provided in the asbestos survey. Identified ACMs include materials such as floor tile, mastic, sheet flooring, adhesive, HVAC insulation and components, and texture.

The methods of removal utilized by the contractor will depend upon the type and location of the ACM being abated. Removed materials will be placed in leak-tight containers prior to transport for disposal. The contractor will take necessary measures to protect both workers and the general public from airborne asbestos fibers during the abatement activities. Methods such as creating negative pressure containments for interior areas, removal of materials intact, and material wetting will be utilized during abatement activities.

Daily air monitoring and project management oversight will be provided throughout the entire length of the abatement activities, and all onsite personnel will maintain the appropriate State of Louisiana certifications.

The goal of the asbestos abatement activities is to remove all identified ACMs from the structures located on the site. Removed ACM will be disposed of in landfills approved by the LDEQ to accept asbestos wastes. The locations of ACM are shown in the provided asbestos survey reports located in **Appendix B** and **Appendix C**. The abatement contractor shall submit appropriate notification paperwork to LDEQ prior to commencing abatement and demolition work. Asbestos abatement and disposal activities are estimated to take approximately twelve weeks.

3.0 COMPLIANCE MONITORING PLAN

PPM's project team will work throughout the project to maintain compliance with applicable regulations. PPM's on-site personnel will be in constant communication with other members of the project team to discuss project activities and progress.

The following regulations will govern the activities conducted during asbestos abatement activities:

1. Title 40, Code of Federal Regulations (CFR), Part 61.145(a)(b)(c) and 61.150, National Emission Standards for Hazardous Air Pollutants. U.S. Environmental Protection Agency (EPA);

2. Title 40, CFR, Part 763, Asbestos-Containing Materials in Schools; Final Rule and Notice;
3. Title 40, CFR, Part 262, Standards Applicable to Generators of Hazardous Waste;
4. Louisiana Admin. Code Title 33 § III-2799
5. Title 29, CFR, Section 1926.1101. Occupational Safety and Health Administration (OSHA), U.S. Department of Labor;
6. Title 29, CFR, Section 1910.134. OSHA, U.S. Department of Labor;
7. Title 29, Part 1910, Section 1200, Hazard Communication Regulation;
8. Title 29, Section 1926.451, OSHA, U.S. Department of Labor;
9. American National Standard Institute (ANSI) Publications: Z88.2-80 Practices for Respiratory Protection;
10. ANSI Publications: Z79.2-79 Fundamentals Governing the Design and Operation of Local Exhaust Systems; and
11. Federal, state, county, and city codes and ordinances as applicable.

4.0 PERFORMANCE MONITORING PLAN

Field activities will be conducted in general accordance with applicable sections of the with the EPA QA/R-5 (EPA Requirements for Quality Assurance Project Plans – March 2001); LDEQ regulations, requirements, and protocols, and the Quality Assurance Project Plan (Appendix D). Conditions encountered in the field that impact the cost of the project or stated project goals will be promptly relayed to the client and the LDEQ project managers. The work plan will then be modified, if necessary, to address feedback from the client and the LDEQ.

5.0 HEALTH AND SAFETY PLAN

The PPM Project Manager will serve as the Site Safety Officer for the duration of the asbestos abatement project. PPM personnel and subcontractors will provide documentation of applicable certifications, training, and annual medical surveillances. The asbestos abatement contractor will be required to provide a Health and Safety Plan (HASP) prior to initiation of any field work. The HASP and documentation of OSHA training will be available for review at the site during the field activities and will be retained in the project file at PPM's office in Monroe, Louisiana

5.1 SAFETY AND HEALTH RISK ANALYSIS

The most prominent hazard when conducting asbestos abatement is the inhalation of asbestos fibers. Asbestos is a known carcinogen, and inhalation of asbestos fibers can result in serious disease such as lung cancer, mesothelioma, and asbestosis. The removal methods utilized during the abatement are designed to prevent inhalation of fibers by project workers directly involved with ACM removal; by support staff located outside of designated work areas and containment; and by the general public. Respiratory protection and whole body clothing protection provide secondary protection for workers in designated work areas and containment areas during abatement activities.

Other health and safety concerns include physical hazards associated with the utilization of hand tools, slipping, falling, tripping, and heat stress. Good housekeeping which includes maintaining clean and clear walkways, will be practiced during this project. Personnel will be informed of the signs and symptoms of heat stress in order to take preventative precautions.

5.2 SITE PERIMETER ESTABLISHMENT

The contractor will be required to control access to areas where asbestos abatement is occurring. In addition to controlling access, the contractor will provide caution signs at approaches to asbestos regulated and controlled work areas. Signs will be located at such a distance that personnel may read the sign and take necessary precautions required prior to entering the area. Labels will be affixed to ACM, scrap, waste, and debris.

5.3 RECOMMENDED LEVELS OF PROTECTION

Personal Protective Equipment (PPE) required during asbestos abatement activities includes respiratory protection, protective clothing, and protective eyewear. If additional site hazards are identified before or during abatement activities, site personnel should wear protection as required by the most stringent OSHA and/or EPA standards applicable to the activities.

5.3.1 Respirators

Respirators will be selected from those that meet the standards set by the National Institute of Occupational Safety and Health (NIOSH), Department of Health and Human Services.

OSHA requires that individuals who wear respirators be medically cleared for respiratory protection use.

5.3.2 Protective Clothing

Disposable whole body protective clothing, head coverings, gloves, and foot coverings will be worn when workers may be exposed to airborne concentrations of asbestos fibers. Disposable plastic or rubber gloves will be used to protect hands; sleeves will be secured at the wrists, and foot coverings will be secured at the ankles by use of tape.

5.3.3 Eye Protection

Personnel will wear protective goggles when engaged in abatement activities where the potential for eye injury exist.

5.3.4 Footwear

Personnel will wear boots with non-skid soles. Foot protectors will be worn by workers when required by OSHA.

5.4 AIR MONITORING

Air monitoring will be performed in accordance with OSHA 29 CFR 1926.1101 and final air clearance will be analyzed in accordance with NIOSH Method 7400, Issue 2. The following sections detail specific components of the air monitoring program.

5.4.1 Area Monitoring

PPM will provide an Air Monitor to perform specific testing prior to asbestos removal, during abatement activities, and following the completion of the abatement activities. This testing will produce an air clearance sample prior to releasing the structures for further renovations. The asbestos abatement contractor will be advised when questions of compliance with standards of quality and completeness of work arise. The contractor will be expected to resolve questions to the best of their abilities.

<u>Area Air Monitoring Services:</u>

- Sampling will be conducted as directed by PPM's Project Team.

- Air monitoring pumps will be provided to collect samples of airborne asbestos concentrations.
- Air monitoring pumps will be calibrated before each sampling cycle.
- Monitoring of results and complete fiber counting will be performed within 16 hours after each test.
- All testing results will be reviewed by a registered Professional Engineer (P.E.).
- The contractor will be notified immediately of exposures in excess of acceptable and/or specified limits.

Monitoring Procedures:

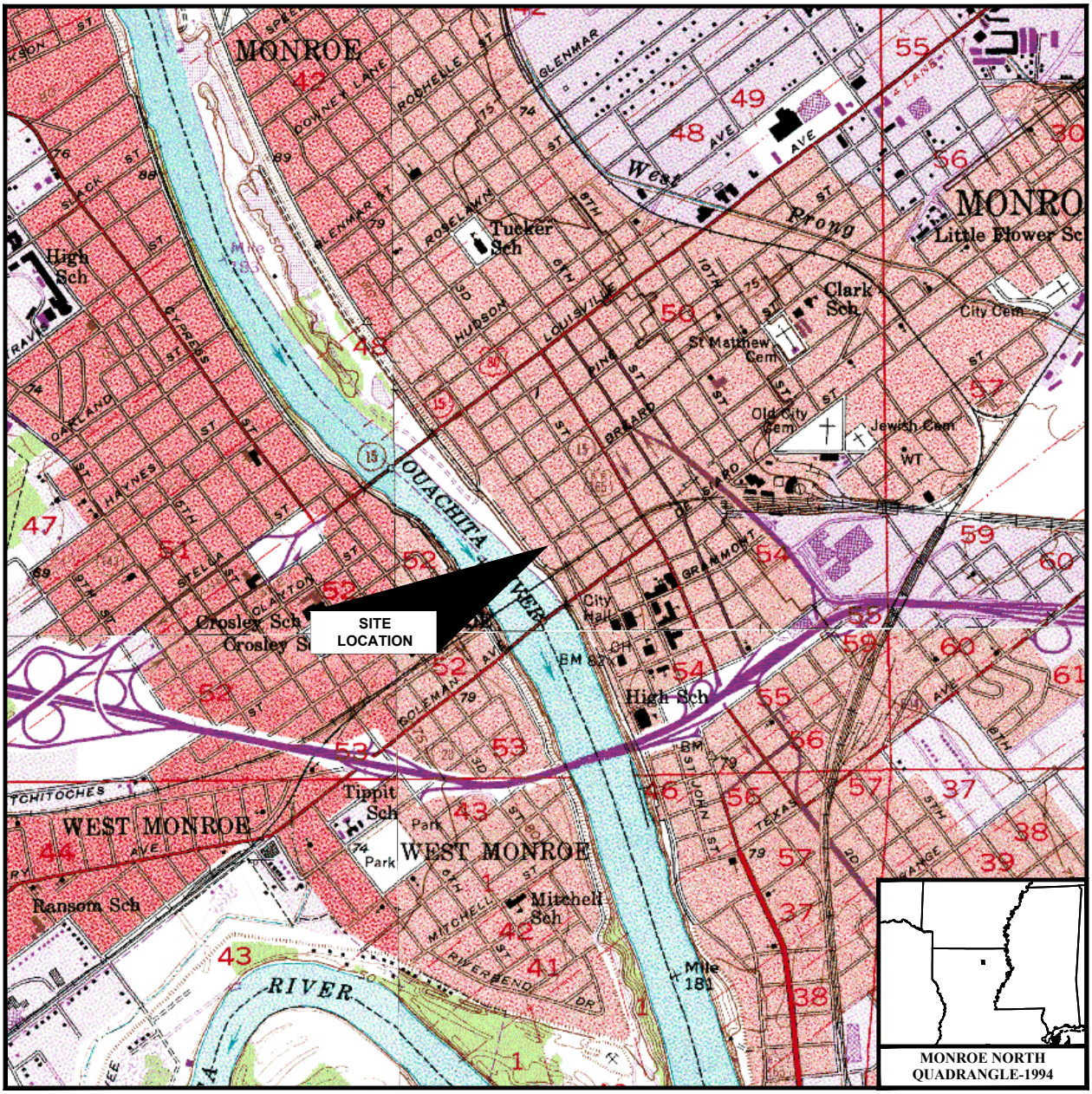
- Area monitoring will be performed prior to abatement work to establish reference background concentrations.
- Air sampling during asbestos removal activities will be performed during each eight-hour shift consisting of at least two (2) samples inside the building, one sample at each barrier (outside work area) between work area and non-work area, one (1) sample at each local air exhaust, one (1) sample outside the decontamination waste holding room exit, and one (1) sample outside each clean change room entry.
- A visual inspection will be performed of each functional space where the removal of ACM has taken place.
- Clearance air samples will be collected as directed by PPM's project team. Final clearance air samples will be analyzed using Phase Contrast Microscopy (PCM) analysis techniques. Laboratory determination of airborne concentrations of asbestos fibers will be performed by membrane filter methods in accordance with NIOSH 7400.

5.4.2 Personal Monitoring

The Contractor will be responsible for ensuring compliance with OSHA Regulation 29 CFR 1926.1101 with regards to personal air monitoring.
Need to add a section that discusses the Community Relations Plan or add as an appendix and reference the appendix in another section.

APPENDICES

APPENDIX A – FIGURES



SCALE: 1 : 24,000

1 .5 0 1 MILES

1000 0 1000 5000 10,000 FEET

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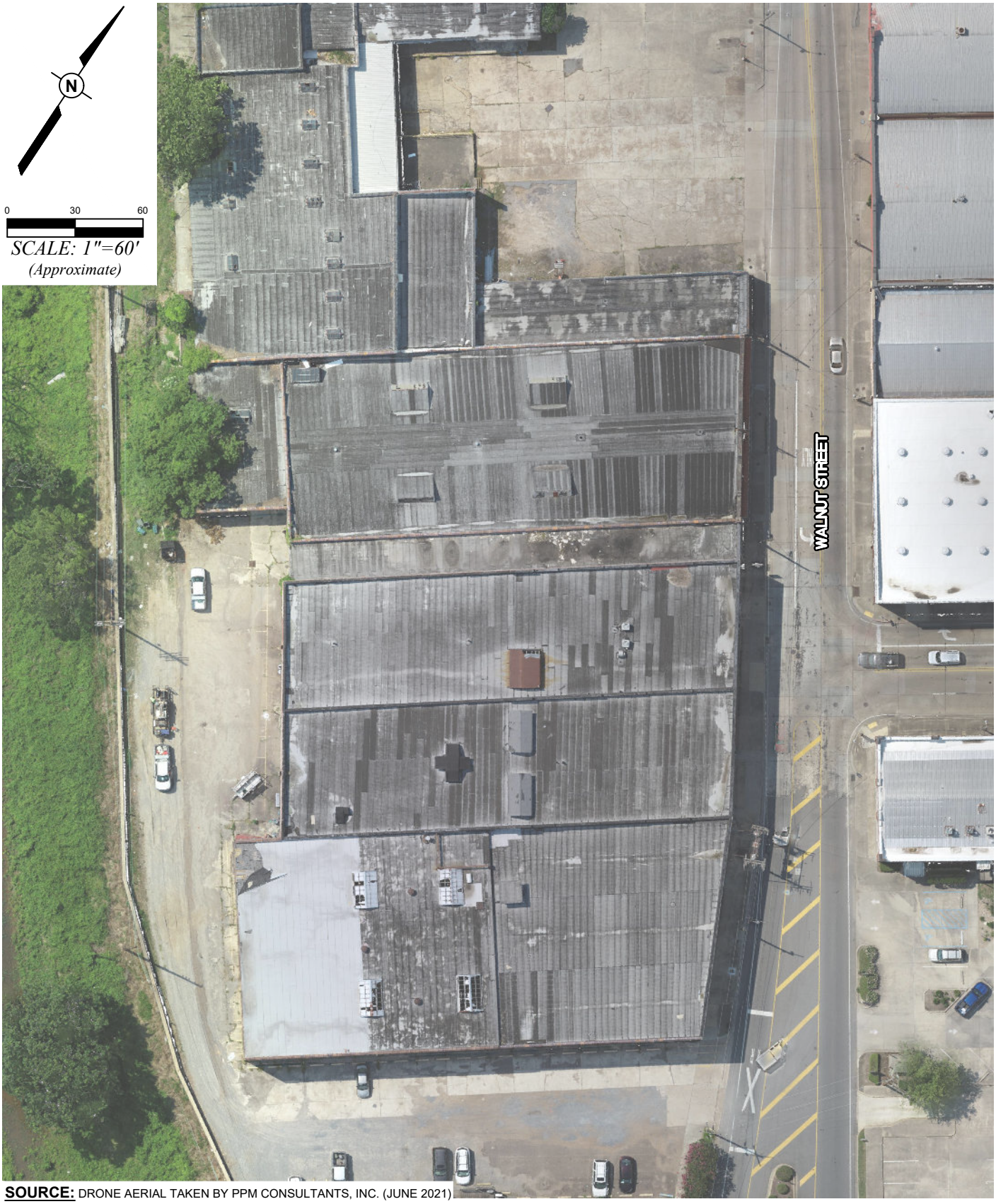
PPM CONSULTANTS, INC. www.ppmco.com		CITY OF MONROE **FORMER OUACHITA CANDY COMPANY** 211 - 305 WALNUT STREET MONROE, LOUISIANA	SITE LOCATION MAP	FIGURE NUMBER 1
DRAWN BY: JCP	DRAWN DATE: 07/09/21			
PROJECT NUMBER: 11472001	PHASE: ESA2			



SOURCE: DRONE AERIAL TAKEN BY PPM CONSULTANTS, INC. (JUNE 2021)

PPM CONSULTANTS, INC. www.ppmco.com		CITY OF MONROE **FORMER OUACHITA CANDY COMPANY** 211 - 305 WALNUT STREET MONROE, LOUISIANA	SITE MAP
DRAWN BY: JCP	DRAWN DATE: 07/08/21		FIGURE NUMBER 2
PROJECT NUMBER: 11472001	PHASE: ESA2		

APPENDIX B –PAC ENVIRONMENTAL SPECIALISTS ASBESTOS INSPECTION REPORT, OUACHITA CANDY COMPANY, JULY 12, 2021

ASBESTOS INSPECTION REPORT

Ouachita Candy Company

211-305 Walnut St.

Monroe, LA 71201

PAC Environmental Specialists

12 July 2021

ASBESTOS INSPECTION REPORT

Ouachita Candy Company
211 - 305 Walnut Street
Monroe, LA 71220

Prepared By:

Mary Cooper, Asbestos Inspector

LDEQ Accreditation No. MI192256

Date of Inspection: June 15-29, 2019

Kadie Wheat, Asbestos Inspector

PAC Environmental Specialists, LLC
1011 Hwy 139
PO Box 689
Swartz, LA 71281
(318) 345-0889

Report Date:

Monday, July 12, 2021

TABLE OF CONTENTS

INTRODUCTION

This report summarizes Asbestos Containing Materials (ACM) findings for the location in question (Vacant commercial building located at 211 - 305 Walnut St., Monroe, LA). The findings are based on existing conditions at the time of the inspection, which was performed July 15-29, 2021.

Samples were collected from each homogenous area that could be safely accessed. **Flea infestation is the worst in Building 2. No measurements were taken in Building 2 and the 2nd floor was not accessed to limit time for inspectors on site in order to reduce risks from flea infestation. 2nd floor of Building 3 was not accessed due to unsafe conditions (holes in floor). Roofing materials were not accessible and were not sampled. Roofing materials are excluded from this inspection. A change order may be added for equipment to be used to access the roofing materials at a later date.** Laboratory Analysis was performed by Eurofins/CEI Labs in accordance with US Environmental Protection Agency (EPA) and Louisiana Department of Environmental Quality (LDEQ) accreditation requirements and methodologies.

The inspection and laboratory analysis **does** indicate asbestos in the suspected areas sampled at 211 - 305 Walnut St., Monroe, LA. **ALL HVAC INSULATION AND COMPONENTS ARE PACBM in addition to confirmed ACM from sampling.**

SUMMARY OF FINDINGS

211 - 305 Walnut St.: ACM **was** detected in the suspected samples collected at the former school.

***NOTE**: (ACM) = Asbestos Containing Materials

CONSIDERATIONS

The Louisiana Air Quality Regulations (LAC 33:111.5151, subchapter M) require written notification of all demolition activities. LDEQ form AAC-2 must be completed for each structure and forwarded to LDEQ prior to demolition activities. Amplifying information can be obtained at www.deq.state.la.us

APPENDIX A: DATA SHEETS

FIGURE

A

SITE MAP

LOCATION:
Ouachita Candy Company
211 - 305 Walnut St.
Monroe, LA

BUILDING NUMBERS

ASBESTOS INSPECTION
DATE: 6/15-29/2021

PAC
Environmental Specialists
1011 Hwy 139, Monroe, LA
318-345-0889

DATE:	
7/8/2021	
DRAWN BY:	**SCALE:**
MEC	NTS

Ouachita Candy Company
Asbestos Inspection
Samples Collected 6/15-29/21

Red= Asbestos Containing Material (ACM) Blue= Non ACM

Green= Materials that Contain <1% Asbestos

Location	Structure Code	Sample ID	Description of Material	Friable Y/N	Asbestos %	Sample Date
Building 1	B1	B1-01-01	White Ceiling Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-01-02	White Ceiling Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-01-03	White Ceiling Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-02-01	Wallboard	Y	ND	6/15/2021
Building 1	B1	B1-02-02	Wallboard	Y	ND	6/15/2021
Building 1	B1	B1-02-03	Wallboard	Y	ND	6/15/2021
Building 1	B1	B1-03-01	Wall Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-03-02	Wall Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-03-03	Wall Sheetrock	Y	ND	6/15/2021
Building 1	B1	B1-04-01	Tan Flooring and Tan Mastic	N	ND	6/15/2021
Building 1	B1	B1-04-02	Tan Flooring and Tan Mastic	N	ND	6/15/2021
Building 1	B1	B1-04-03	Tan Flooring and Tan Mastic	N	ND	6/15/2021
Building 1	B1	B1-05-01	Gray Mortar	Y	ND	6/15/2021
Building 1	B1	B1-05-02	Gray Mortar	Y	ND	6/15/2021
Building 1	B1	B1-05-03	Gray Mortar	Y	ND	6/15/2021
Building 1	B1	B1-06-01	Beige Plaster	Y	Chrysotile <1%	6/15/2021
Building 1	B1	B1-06-02	Beige Plaster	Y	Chrysotile <1%	6/15/2021
Building 1	B1	B1-06-03	Beige Plaster	Y	Chrysotile <1%	6/15/2021
Building 2	B2	B2-01 A	Brown Floor Tile	N	Chrysotile 5%	6/29/2021
Building 2	B2	B2-01 B	Black Mastic	N	Chrysotile 3%	6/29/2021
Building 2	B2	B2-02 A	Green Sheet Flooring	N	Chrysotile 25%	6/29/2021
Building 2	B2	B2-02 B	Yellow Mastic	N	Chrysotile 3%	6/29/2021
Building 2	B2	B2-03	White Sheetrock	Y	ND	6/29/2021
Building 2	B2	B2-04 A	Ceiling Tile	Y	ND	6/29/2021
Building 2	B2	B2-04 B	Adhesive	N	Chrysotile 3%	6/29/2021
Building 3	B3	B3-01 Layer 1	White HVAC Insulation	Y	Chrysotile 65%	6/29/2021
Building 3	B3	B3-01 Layer 2	Tan HVAC Insulation	Y	ND	6/29/2021
Building 3	B3	B3-02	Tan/Black HVAC Joint Cloth	Y	ND	6/29/2021
Building 3	B3	B3-03	White/Cream Window Caulking	Y	ND	6/29/2021
Building 3	B3	B3-04	White Surface Material	Y	ND	6/29/2021
Building 3	B3	B3-05 A	Cream/Black Acoustic Tile	Y	ND	6/29/2021
Building 3	B3	B3-05 B	Brown Mastic	N	ND	6/29/2021
Building 3	B3	B3-06 A	Cream/Brown Ceiling Tile	Y	ND	6/29/2021
Building 3	B3	B3-06 B	Brown Mastic	N	ND	6/29/2021
Building 3	B3	B3-07	Beige Plaster	Y	ND	6/29/2021
Building 3	B3	B3-08 Layer 1	Cream Texture	Y	Chrysotile 2%	6/29/2021
Building 3	B3	B3-08 Layer 2	White Sheetrock	Y	ND	6/29/2021
Building 3	B3	B3-09 A	Green Floor Tile	N	Chrysotile 5%	6/29/2021
Building 3	B3	B3-09 B	Black Mastic	N	Chrysotile 3%	6/29/2021
Building 3	B3	B3-10 A	Dark Brown Floor Tile	N	Chrysotile 3%	6/29/2021
Building 3	B3	B3-10 B	Black Mastic	N	ND	6/29/2021
Building 3	B3	B3-11	Cream Insulation	Y	ND	6/29/2021
Building 3	B3	B3-12 A	Cream/Brown Ceiling Tile	Y	ND	6/29/2021
Building 3	B3	B3-12 B	Brown Mastic	N	Chrysotile 5%	6/29/2021

APPENDIX B: SAMPLE LOCATION DIAGRAMS & PICTURES

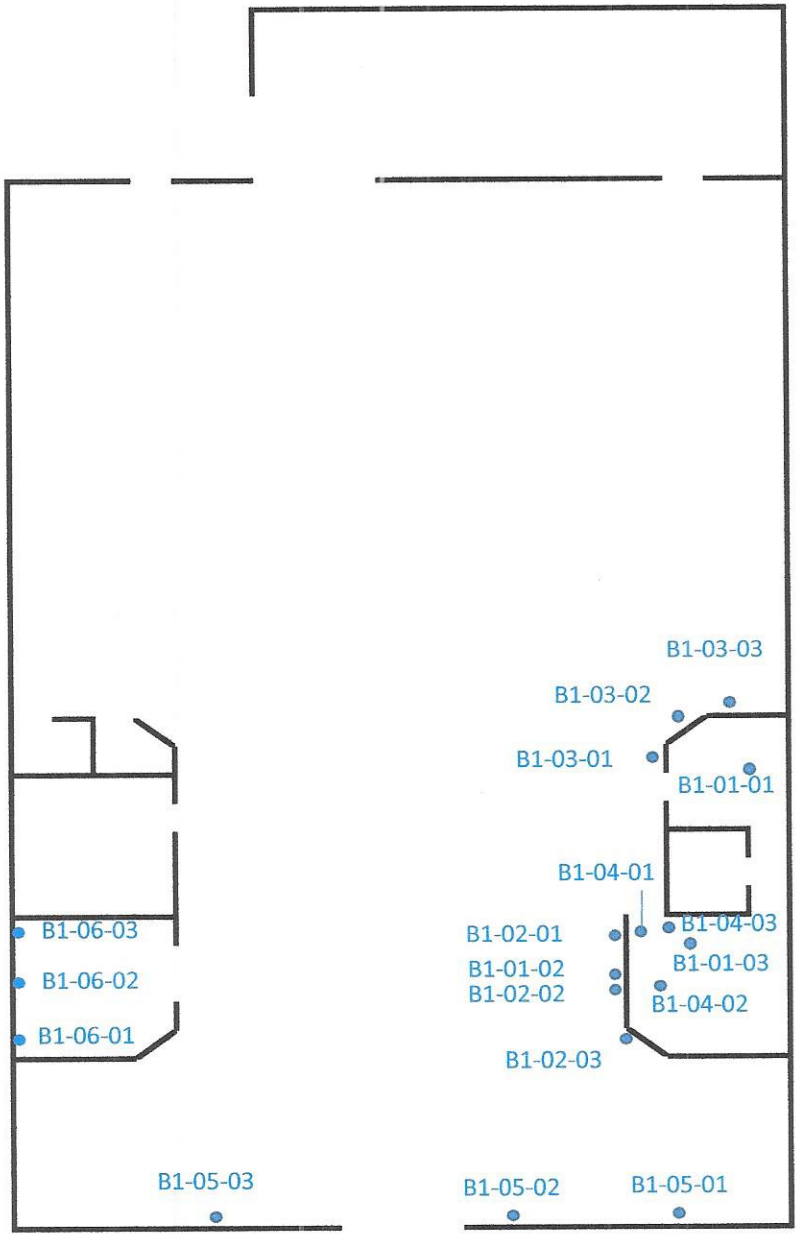
PAC Environmental Specialists, LLC
Commercial Building
211-305 Walnut St.
Inspection Date: 06/15/2021

Asbestos Inspection
Kadie Romano Wheat
LDEQ Cert # MI192255
Building 1

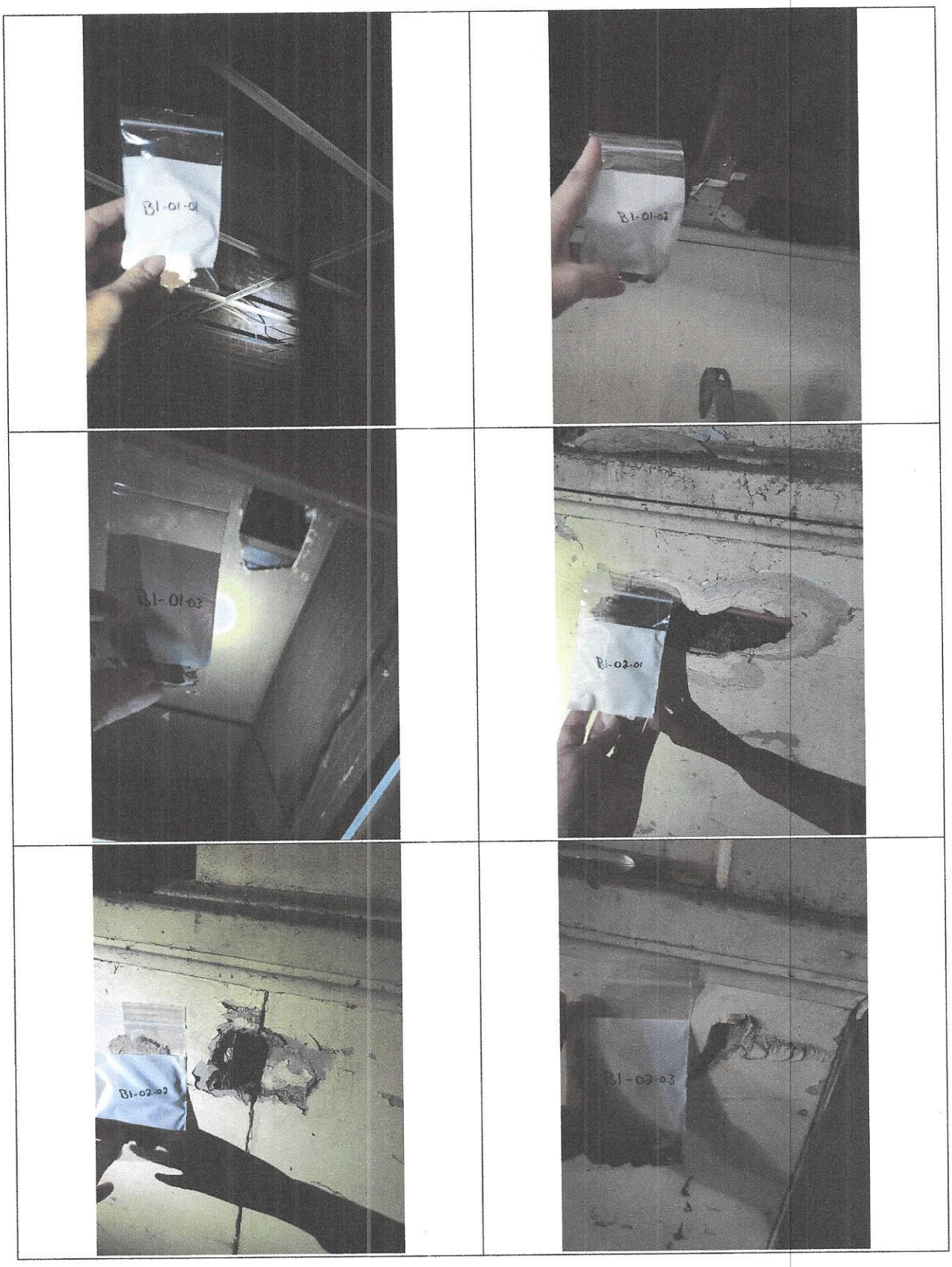
Sample Locations Diagram

Red Font= Asbestos-Containing Material (ACM)

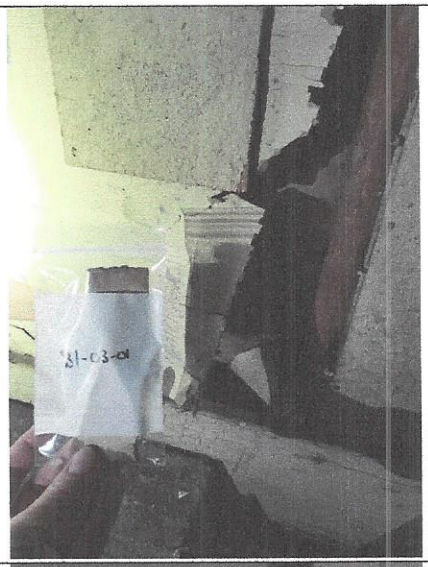
Not to Scale

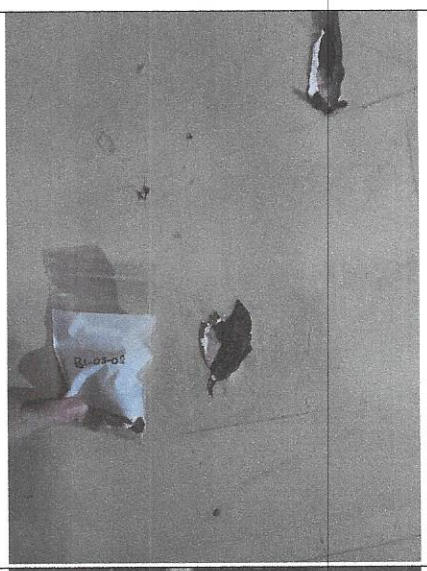


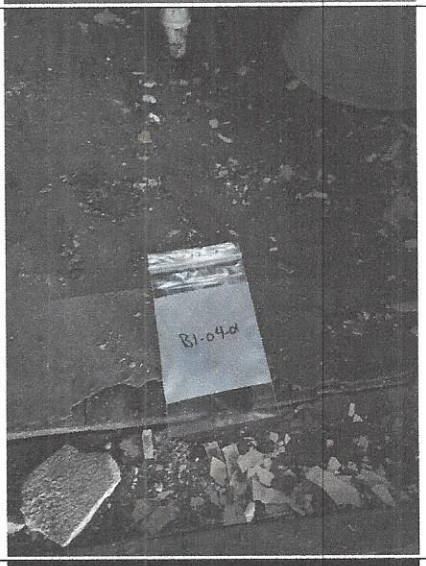
Ouachita Candy- Building 1 Photographs

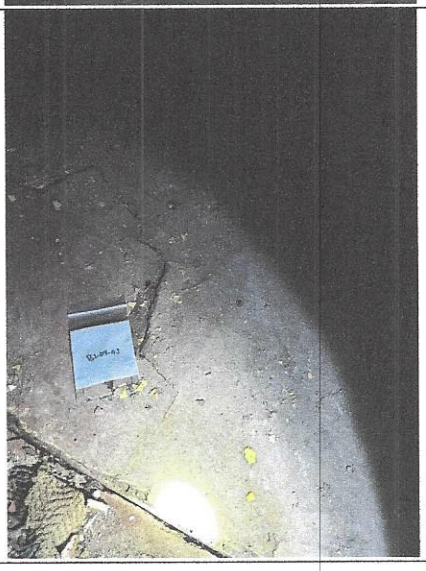


Ouachita Candy- Building 1 Photographs

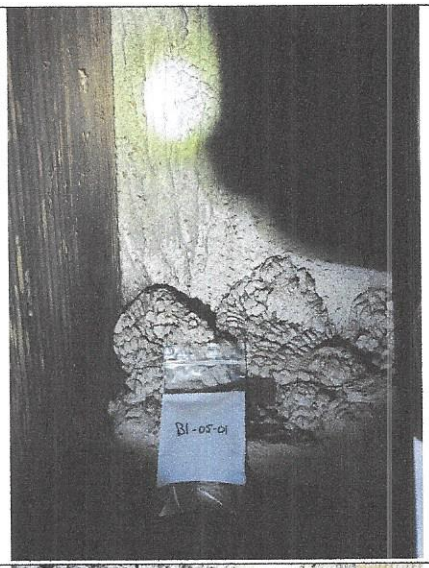


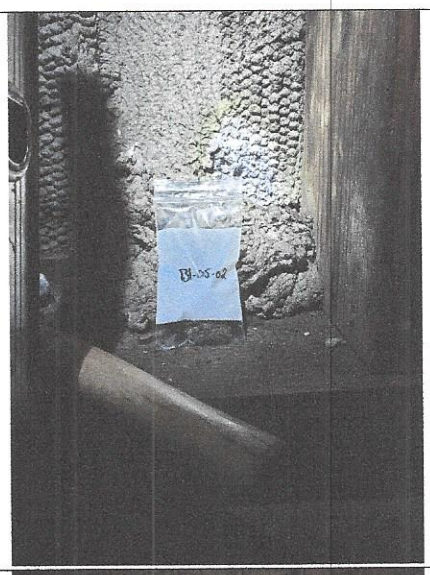


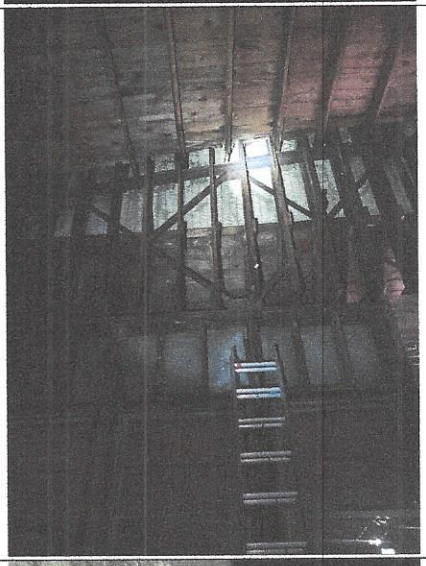


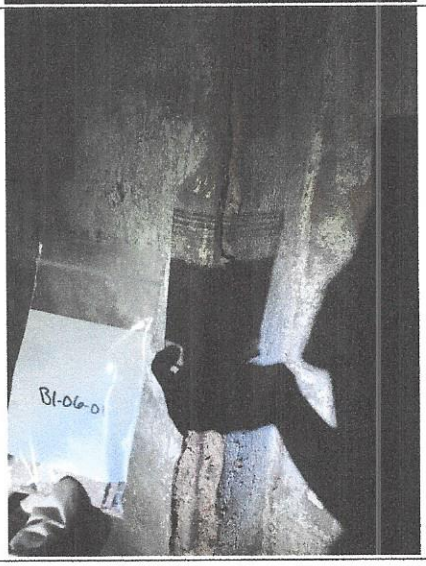


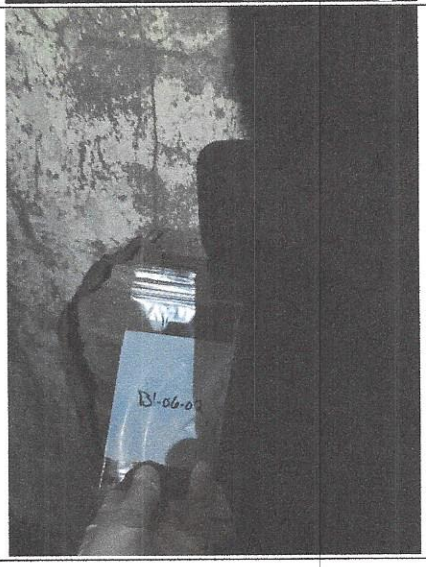
Ouachita Candy- Building 1 Photographs



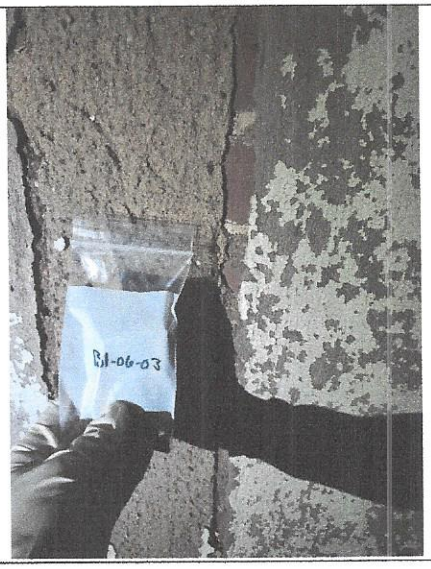


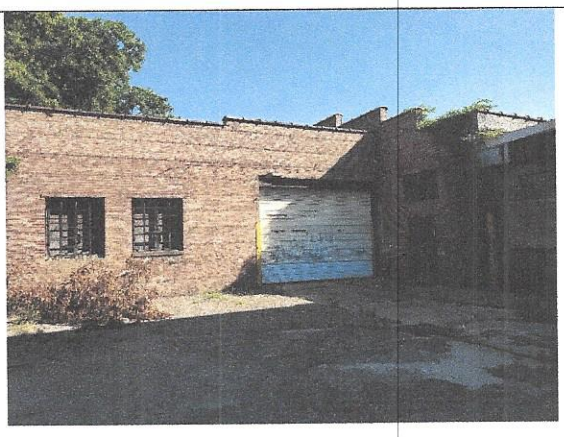






Ouachita Candy- Building 1 Photographs





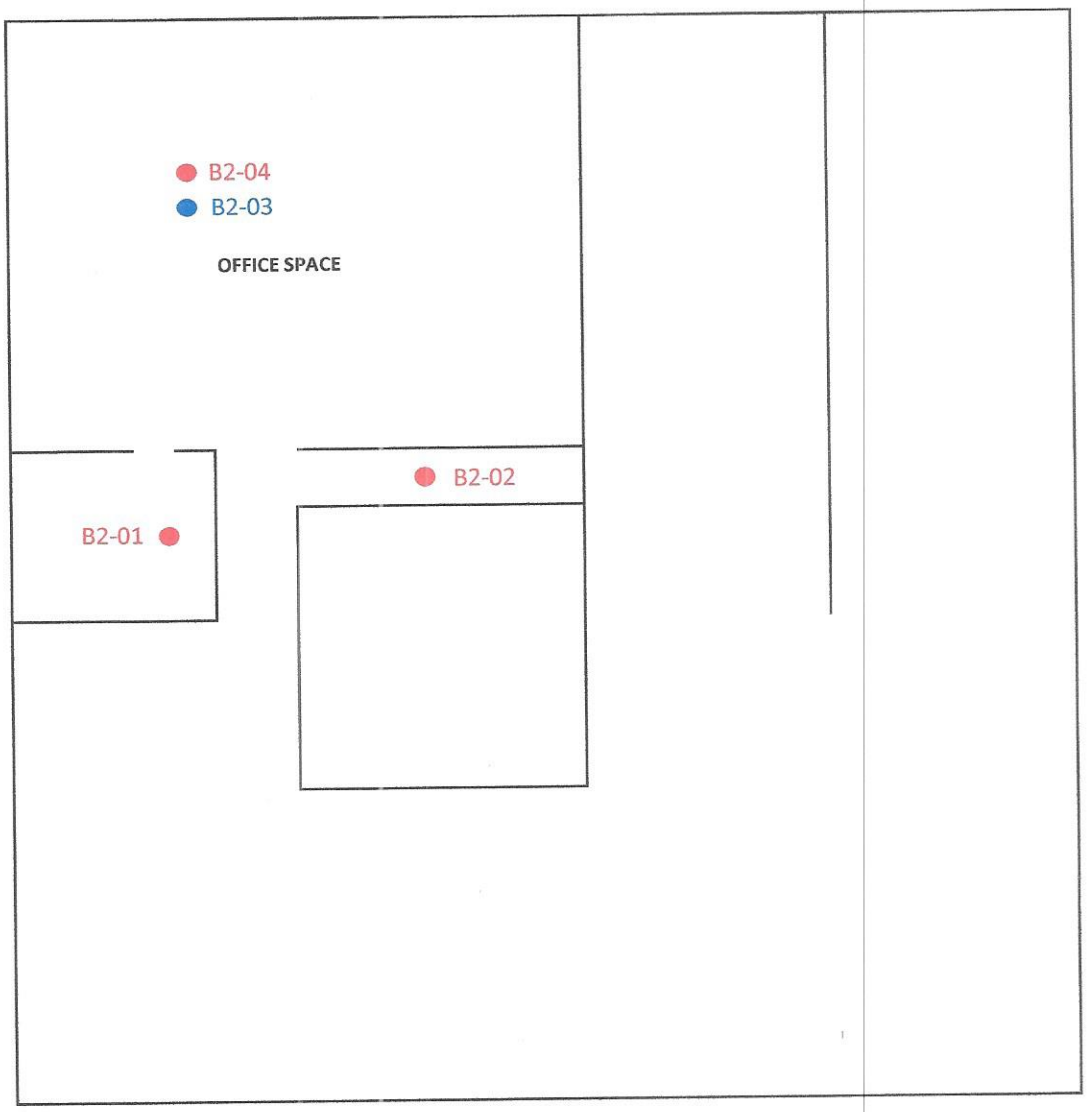
PAC Environmental Specialists, LLC
Commercial Building
211-305 Walnut St.
Inspection Date: 06/29/2021

Asbestos Inspection
Kadie Romano Wheat
LDEQ Cert # MI192255
Building 2

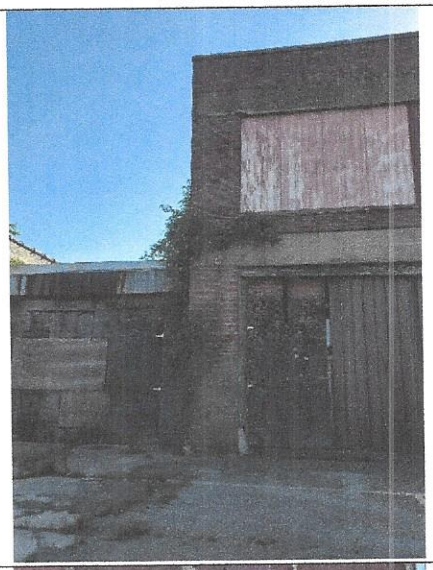
Sample Locations Diagram

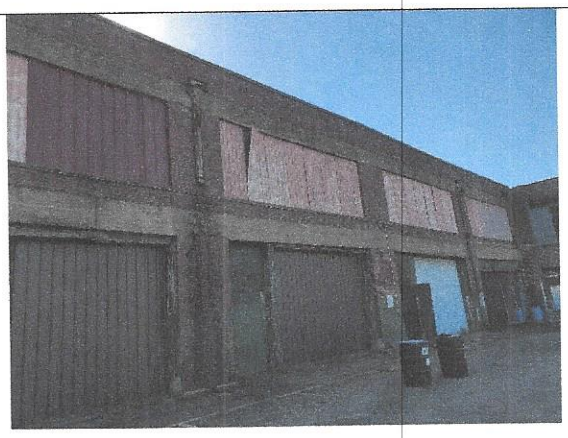
Red Font= Asbestos-Containing Material (ACM)

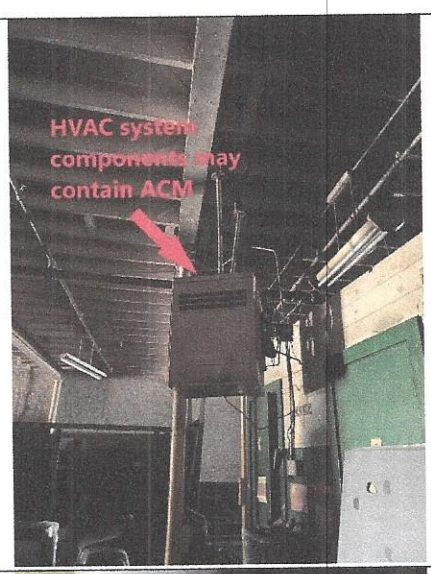
Not to Scale

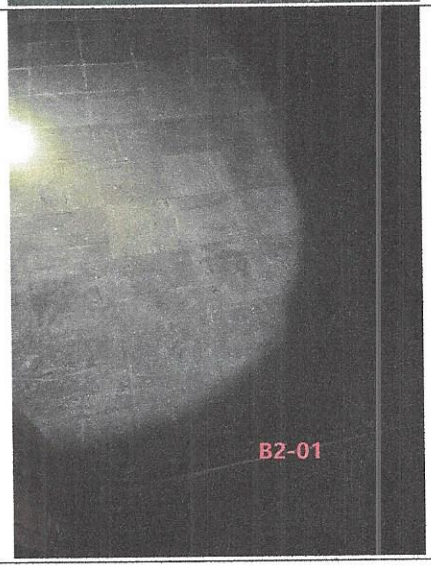


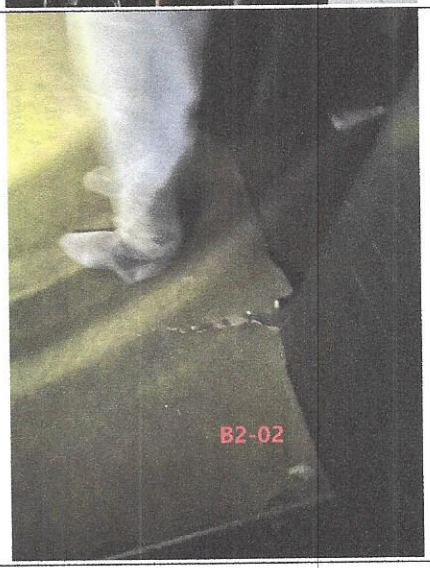
Ouachita Candy- Building 2 Photographs



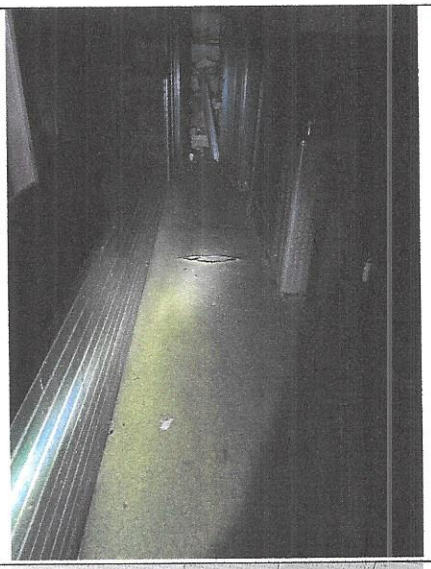


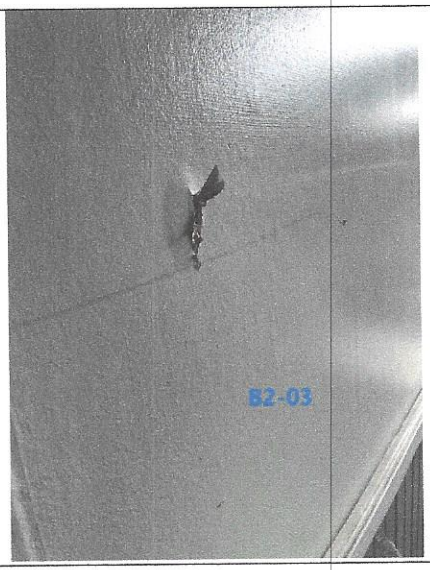


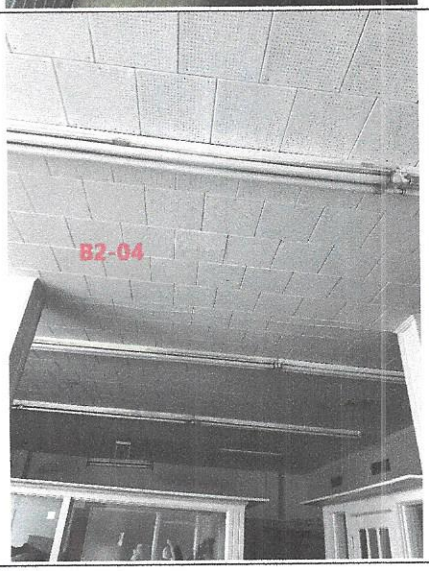




Ouachita Candy- Building 2 Photographs







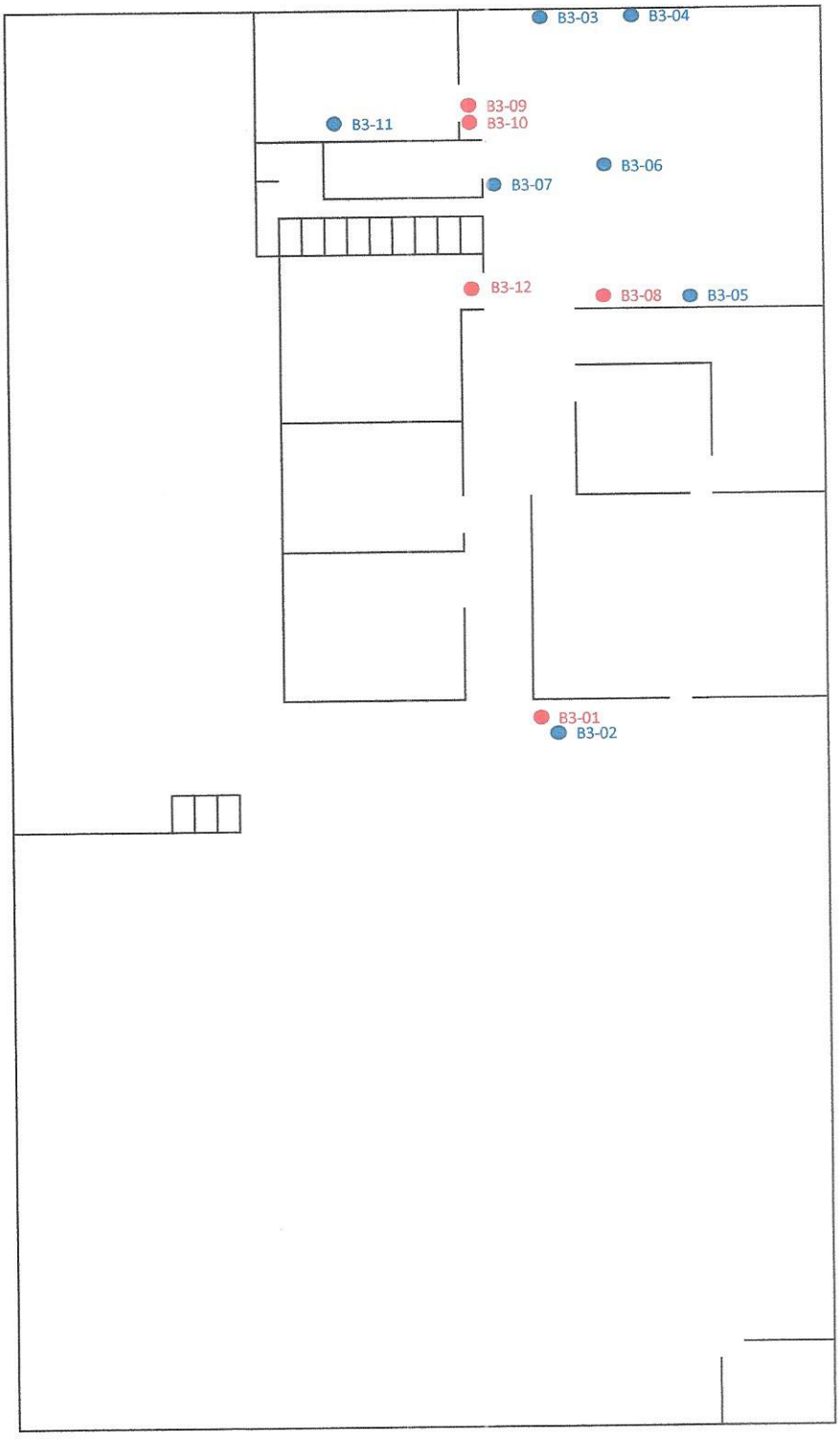
PAC Environmental Specialists, LLC
Commercial Building
211-305 Walnut St.
Inspection Date: 06/29/2021

Asbestos Inspection
Kadie Romano Wheat
LDEQ Cert # MI192255
Building 3 First Floor

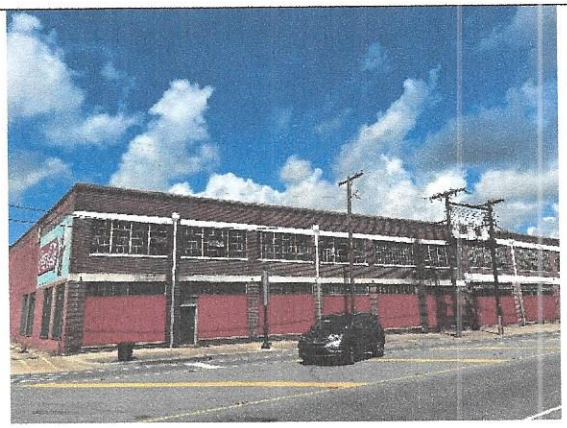
Sample Locations Diagram

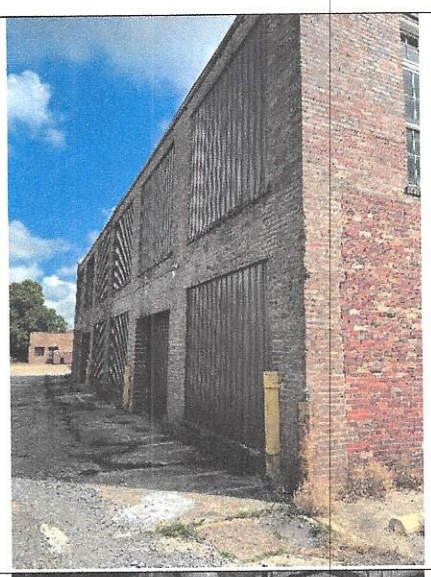
Red Font= Asbestos-Containing Material (ACM)

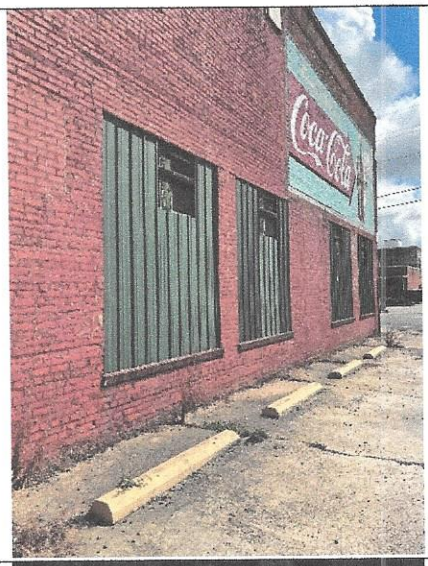
Not to Scale

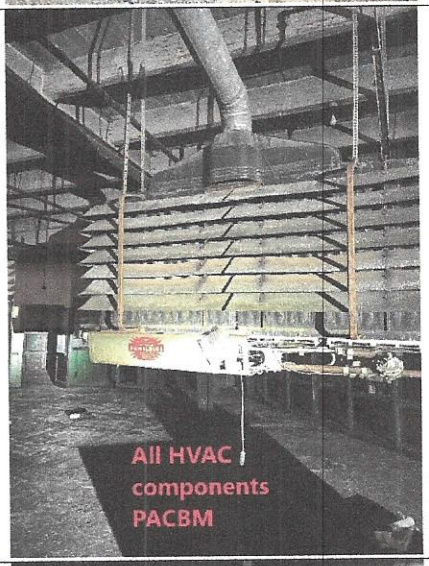


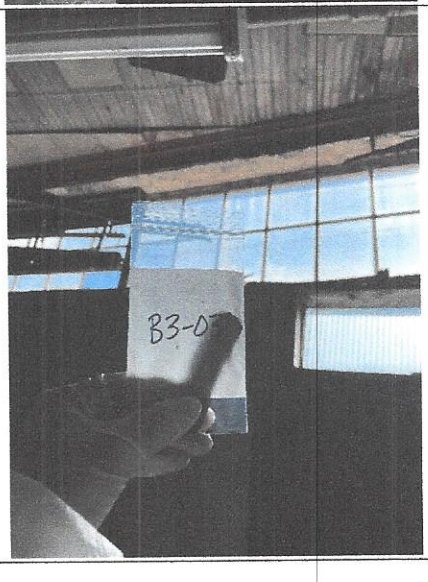
Ouachita Candy- Building 3 Photographs



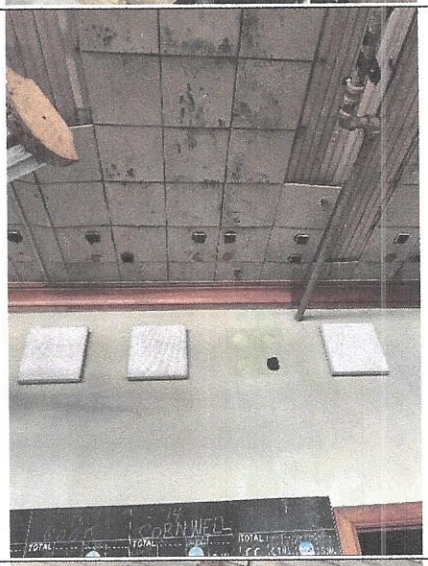




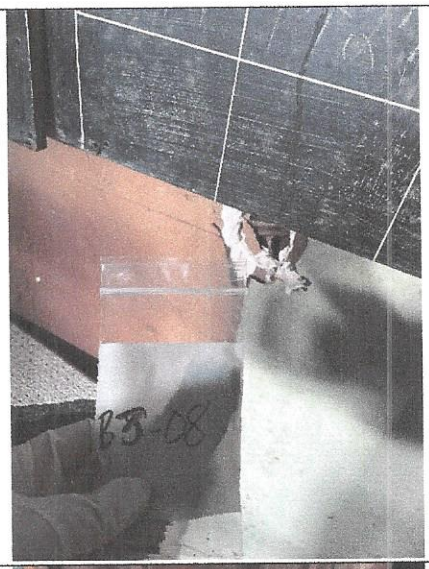


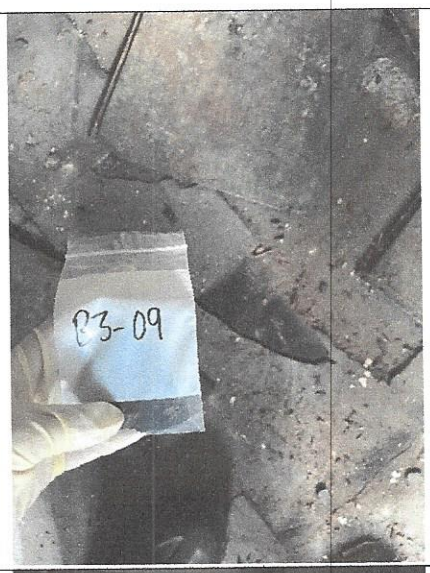


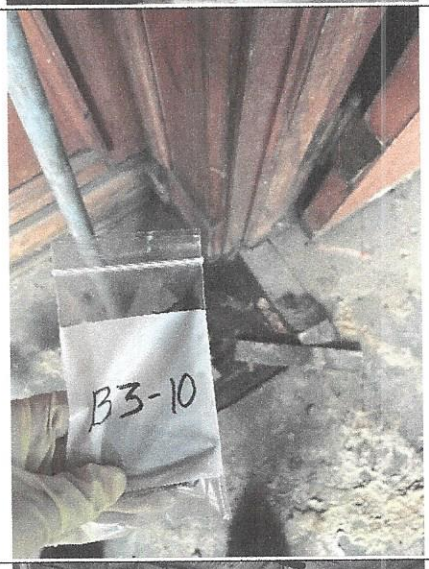
Ouachita Candy- Building 3 Photographs

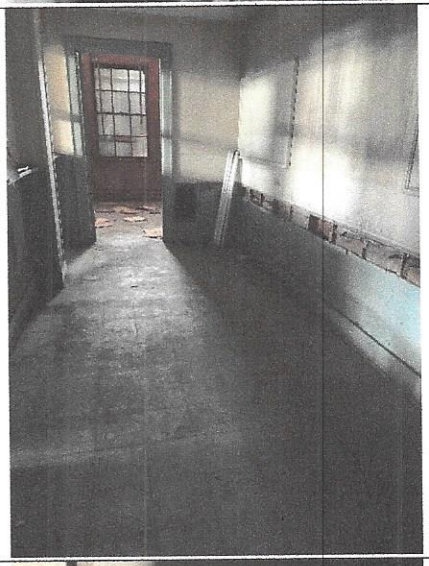


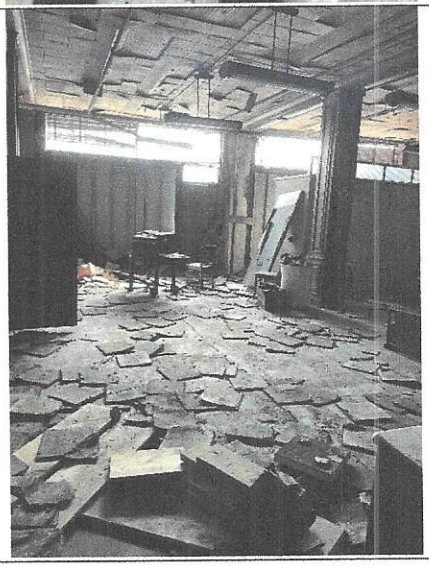
Ouachita Candy- Building 3 Photographs

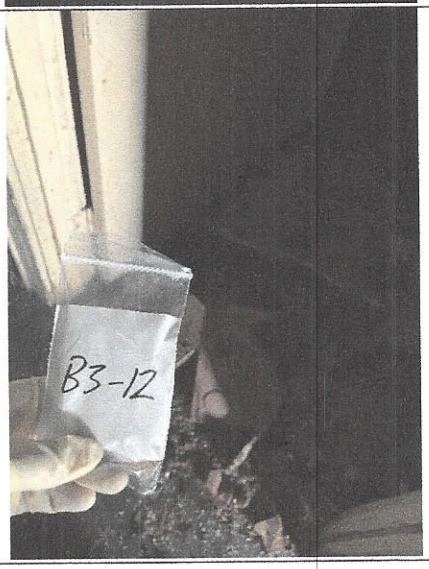




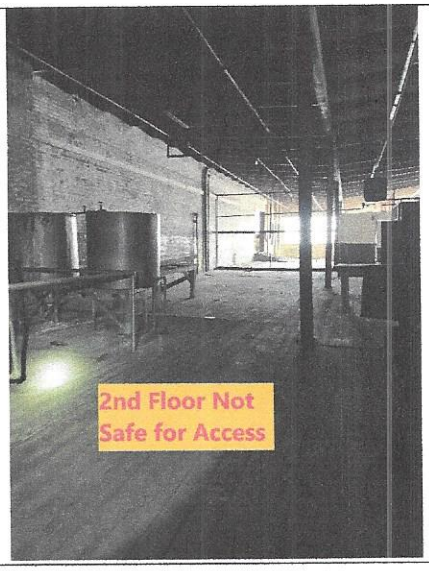


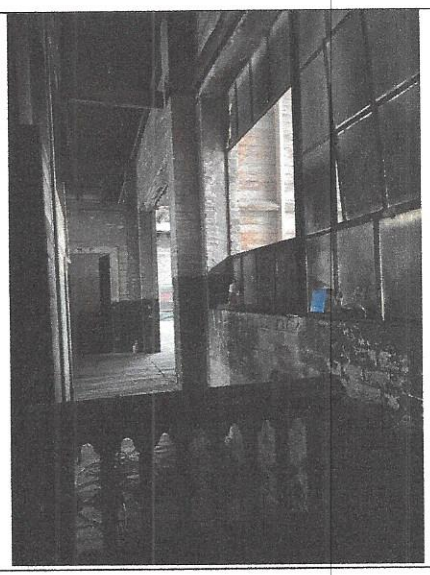






Ouachita Candy- Building 3 Photographs



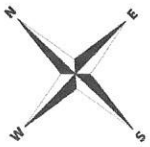


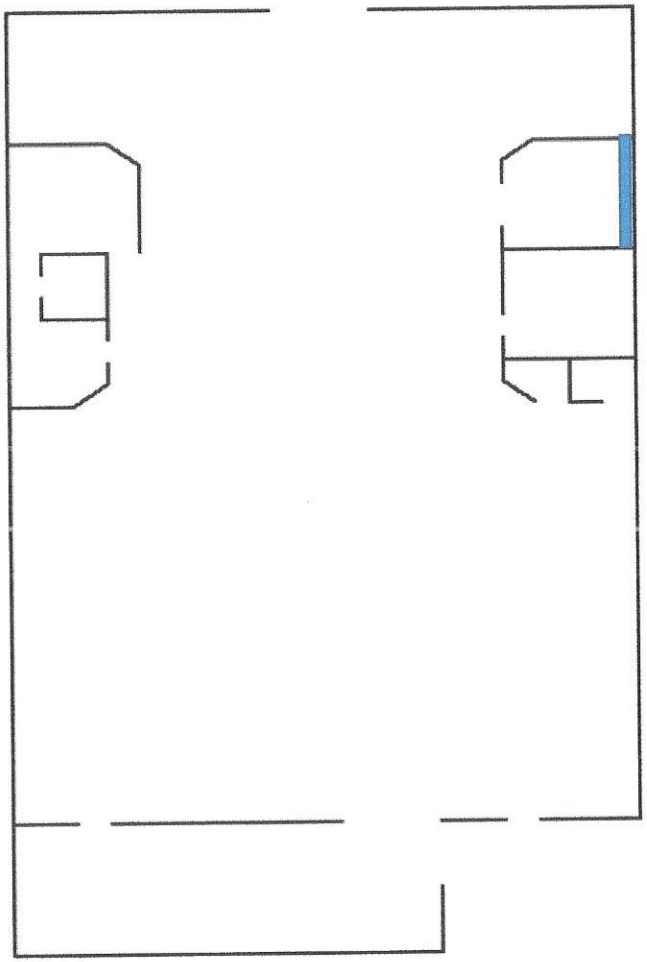
APPENDIX C: HOMOGENEOUS AREA SUMMARY & DIAGRAMS

Ouachita Candy Company
Asbestos Inspection
ACM Homogeneous Areas Summary Table
6/15-29/2021

Building 1			
Floor	Flooring Materials	TSI Materials	Miscellaneous Materials
1	NO ACM	NO ACM	NO ACM
Building 2			
Floor	Flooring Materials	TSI Materials	Miscellaneous Materials
1	**HA-2-01** Brown 9x9 Floor Tile and Adhesive **HA-2-02** Green Sheet Flooring and Adhesive	NO ACM	**HA-2-03** Ceiling Tile Adhesive
Building 3			
Floor	Flooring Materials	TSI Materials	Miscellaneous Materials
1	**HA-3-03** Green Floor Tile and Adhesive and Dark Brown Floor Tile Underneath	**HA-3-01** White HVAC Insulation	**HA-3-02** Cream Wall Texture **HA-3-04** Brown Ceiling Tile Adhesive

WALNUT ST.





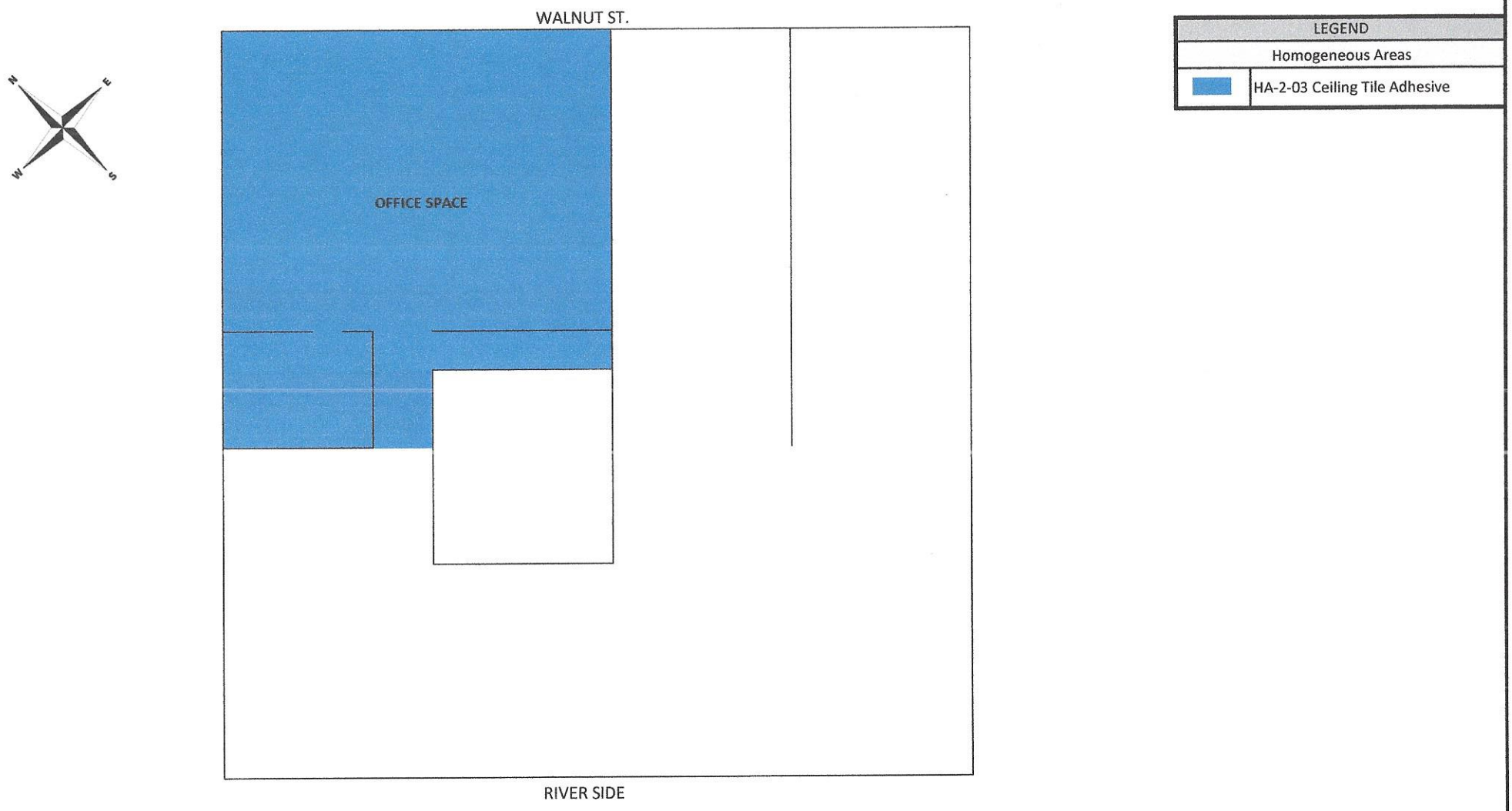
LEGEND
Homogeneous Areas
HA-01-01 Beige Plaster

Material is <1% Asbestos

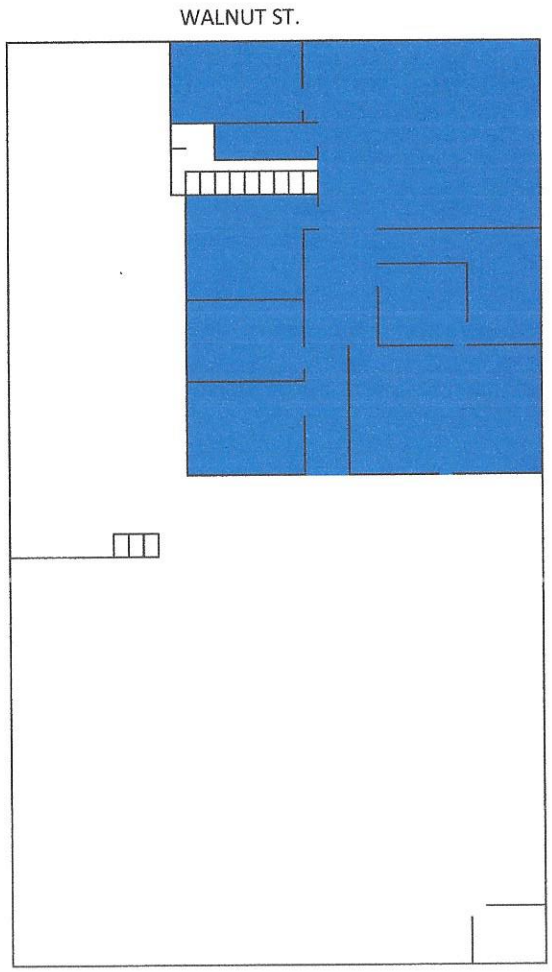
RIVER SIDE

PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021		OUACHITA CANDY COMPANY 211 - 305 WALNUT STREET MONROE, LOUISIANA	Building 1 Miscellaneous Material	Figure Number 1
	Drawn by: MEC	Scale NTS			

PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021 Drawn by: MEC Scale: NTS	**OUACHITA CANDY COMPANY** **211 - 305 WALNUT STREET** **MONROE, LOUISIANA**	**Building 2 Flooring**	**Figure Number 2**



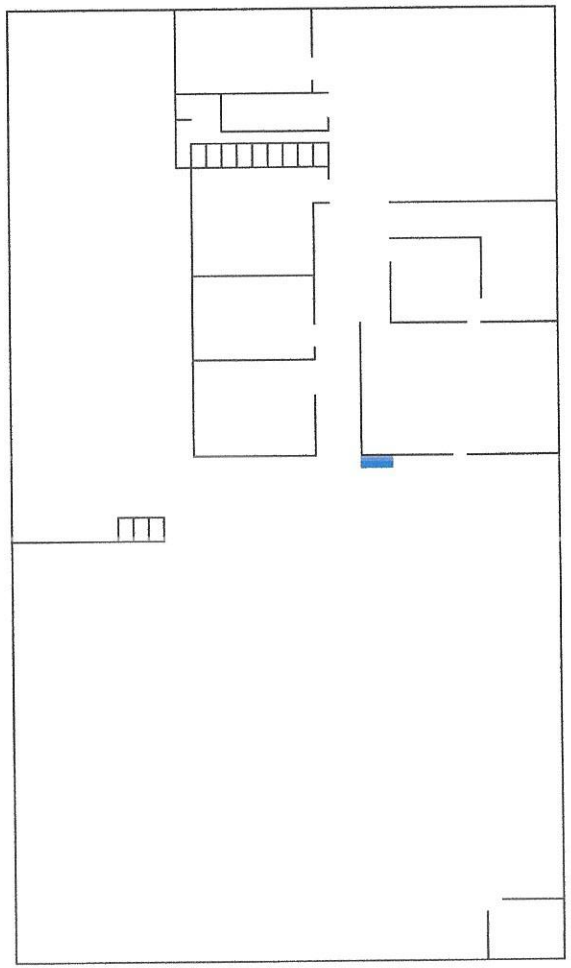
PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021 Drawn by: MEC Scale: NTS	**OUACHITA CANDY COMPANY** **211 - 305 WALNUT STREET** **MONROE, LOUISIANA**	**Building 2** **Miscellaneous**	**Figure Number** **3**



LEGEND	
Homogeneous Areas	
	HA-3-03 Green Floor Tile and Adhesive and Dark Brown Floor Tile Underneath

PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021 Drawn by: MEC / Scale: NTS	**OUACHITA CANDY COMPANY** **211 - 305 WALNUT STREET** **MONROE, LOUISIANA**	**Building 3** **First Floor** **Flooring**	Figure Number **4**

WALNUT ST.

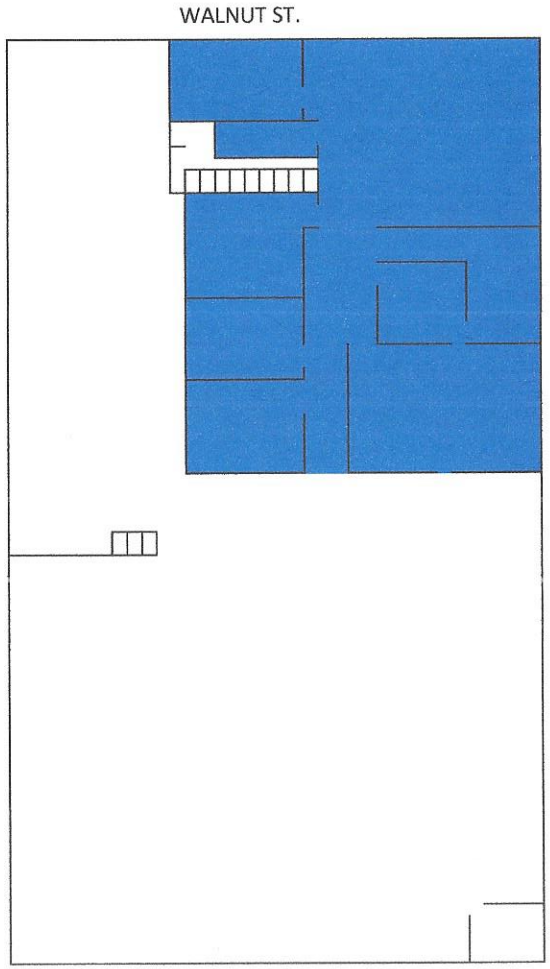


RIVER SIDE

LEGEND	
Homogeneous Areas	
	HA-3-01 White HVAC Insulation

ALL HVAC INSULATION IS PACBM

PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021		OUACHITA CANDY COMPANY 211 - 305 WALNUT STREET MONROE, LOUISIANA	Building 3 First Floor TSI	Figure Number 5
	Drawn by: MEC	Scale NTS			



LEGEND	
Homogeneous Areas	
	HA-3-04 Brown Ceiling Tile Adhesive

PAC Environmental Specialists 1011 Hwy 139 Monroe, LA 71203	Date: 7/9/2021 Drawn by: MEC Scale: NTS	OUACHITA CANDY COMPANY 211 - 305 WALNUT STREET MONROE, LOUISIANA	Building 3 First Floor Miscellaneous	Figure Number 6

APPENDIX D: LABORATORY ANALYSIS & CHAIN OF CUSTODY

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July 2, 2021

PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

CLIENT PROJECT: 211-305 Walnut St. - Building 1, 21231
CEI LAB CODE: B215286

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on June 30, 2021. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

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

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

Kind Regards,

Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP® TESTING
NVLAP LAB CODE 101768-0

eurofins | CEI

ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

PAC ENVIRONMENTAL SPECIALISTS

CLIENT PROJECT: 211-305 Walnut St. - Building 1, 21231

LAB CODE: B215286

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

REPORT DATE: 07/02/21

TOTAL SAMPLES ANALYZED: 18

SAMPLES >1% ASBESTOS:

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Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: 211-305 Walnut St. - Building 1, 21231 **LAB CODE: B215286**

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
B1-01-01		B87723	White	Ceiling Sheetrock	None Detected
B1-01-02		B87724	White	Ceiling Sheetrock	None Detected
B1-01-03		B87725	White	Ceiling Sheetrock	None Detected
B1-02-01		B87726	Cream	Wallboard	None Detected
B1-02-02		B87727	Cream	Wallboard	None Detected
B1-02-03		B87728	Cream	Wallboard	None Detected
B1-03-01		B87729	White	Wall Sheetrock	None Detected
B1-03-02		B87730	White	Wall Sheetrock	None Detected
B1-03-03		B87731	White	Wall Sheetrock	None Detected
B1-04-01		B87732A	Tan	Flooring	None Detected
		B87732B	Tan	Mastic	None Detected
B1-04-02		B87733A	Tan	Flooring	None Detected
		B87733B	Tan	Mastic	None Detected
B1-04-03		B87734A	Tan	Flooring	None Detected
		B87734B	Tan	Mastic	None Detected
B1-05-01		B87735	Gray	Mortar	None Detected
B1-05-02		B87736	Gray	Mortar	None Detected
B1-05-03		B87737	Gray	Mortar	None Detected
B1-06-01		B87738	Beige	Plaster	Chrysotile <1%
B1-06-02		B87739	Beige	Plaster	Chrysotile <1%
B1-06-03		B87740	Beige	Plaster	Chrysotile <1%

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215286
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 1, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B1-01-01 B87723	Ceiling Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected
B1-01-02 B87724	Ceiling Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected
B1-01-03 B87725	Ceiling Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected
B1-02-01 B87726	Wallboard	Heterogeneous Cream Fibrous Bound	95%	Cellulose	5%	Paint	None Detected
B1-02-02 B87727	Wallboard	Heterogeneous Cream Fibrous Bound	95%	Cellulose	5%	Paint	None Detected
B1-02-03 B87728	Wallboard	Heterogeneous Cream Fibrous Bound	95%	Cellulose	5%	Paint	None Detected
B1-03-01 B87729	Wall Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215286
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 1, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B1-03-02 B87730	Wall Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected
B1-03-03 B87731	Wall Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	2% 88%	Paint Gypsum	None Detected
B1-04-01 B87732A	Flooring	Heterogeneous Tan Fibrous Bound	30%	Cellulose	35% 15% 20%	Vinyl Binder Tar	None Detected
B87732B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
B1-04-02 B87733A	Flooring	Heterogeneous Tan Fibrous Bound	30%	Cellulose	35% 15% 20%	Vinyl Binder Tar	None Detected
B87733B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
B1-04-03 B87734A	Flooring	Heterogeneous Tan Fibrous Bound	30%	Cellulose	35% 15% 20%	Vinyl Binder Tar	None Detected

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215286
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 1, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B87734B	Mastic	Homogeneous Tan Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
B1-05-01 B87735	Mortar	Heterogeneous Gray Non-fibrous Tightly Bound			60% 40%	Binder Silicates	None Detected
B1-05-02 B87736	Mortar	Heterogeneous Gray Non-fibrous Tightly Bound			60% 40%	Binder Silicates	None Detected
B1-05-03 B87737	Mortar	Heterogeneous Gray Non-fibrous Tightly Bound			60% 40%	Binder Silicates	None Detected
B1-06-01 B87738	Plaster	Heterogeneous Beige Fibrous Bound	<1% <1%	Cellulose Hair	2% 60% 38%	Paint Binder Silicates	<1% Chrysotile
B1-06-02 B87739	Plaster	Heterogeneous Beige Fibrous Bound	<1% <1%	Cellulose Hair	2% 60% 38%	Paint Binder Silicates	<1% Chrysotile
B1-06-03 B87740	Plaster	Heterogeneous Beige Fibrous Bound	<1% <1%	Cellulose Hair	2% 60% 38%	Paint Binder Silicates	<1% Chrysotile

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

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

REPORTING LIMIT: <1% by visual estimation

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

REGULATORY LIMIT: >1% by weight

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

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

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

ANALYST: Shilpa Ladekar

APPROVED BY: Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP® TESTING
NVLAP LAB CODE 101768-0

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CHAIN OF CUSTODY

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

LAB USE ONLY:
CEI Lab Code: B215286
CEI Lab I.D. Range: B81723- B81740

(18)

COMPANY INFORMATION		PROJECT INFORMATION
CEI CLIENT #: 24123		Job Contact: Miranda Wilson
Company: PAC Environmental Specialists, LLC		Email / Tel: miranda@pacenvironmental.com
Address: PO Box 689		Project Name: 211-305 Walnut St. - Building 1
Swartz, LA 71281		Project ID#: 21231
Email: miranda@pacenvironmental.com		PO #: 21231
Tel: 318-345-0889	Fax: 318-345-0859	STATE SAMPLES COLLECTED IN: LA

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

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

REMARKS / SPECIAL INSTRUCTIONS:

☑ Accept Samples
☐ Reject Samples

Relinquished By:	Date/Time	Received By:	Date/Time
[signature]	6-29-21 1239	[signature]	6/30 9:40

Samples will be disposed of 30 days after analysis

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SAMPLING FORM

B215286

COMPANY CONTACT INFORMATION	
Company: PAC Environmental Specialists, LLC	Job Contact: Miranda Wilson
Project Name: 211-305 Walnut St. - Building 1	
Project ID #: 21231	Tel: 318-345-0889

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
B1-01-01	Ceiling Sheetrock/Room1		PLM [X]	TEM [ ]
B1-01-02	Ceiling Sheetrock/Room1		PLM [X]	TEM [ ]
B1-01-03	Ceiling Sheetrock/Room1		PLM [X]	TEM [ ]
B1-02-01	Wall Board/ Room1		PLM [X]	TEM [ ]
B1-02-02	Wall Board/ Room1		PLM [X]	TEM [ ]
B1-02-03	Wall Board/ Room1		PLM [X]	TEM [ ]
B1-03-01	Wall sheetrock / Room1		PLM [X]	TEM [ ]
B1-03-02	Wall Sheetrock / Room1		PLM [X]	TEM [ ]
B1-03-03	Wall Sheetrock/Room1		PLM [X]	TEM [ ]
B1-04-01	Flooring / Room1		PLM [X]	TEM [ ]
B1-04-02	Flooring / Room1		PLM [X]	TEM [ ]
B1-04-03	Flooring/Room1		PLM [X]	TEM [ ]
B1-05-01	Mortar / Window Space		PLM [X]	TEM [ ]
B1-05-02	Mortar / Window Space		PLM [X]	TEM [ ]
B1-05-03	Mortar/ Window Space		PLM [X]	TEM [ ]
B1-06-01	Wall Plaster /Room2		PLM [X]	TEM [ ]
B1-06-02	Wall Plaster /Room2		PLM [X]	TEM [ ]
B1-06-03	Wall Plaster/Room2		PLM [X]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
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			PLM [ ]	TEM [ ]

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July 6, 2021

PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

CLIENT PROJECT: 211-305 Walnut St. - Building 2, 21231
CEI LAB CODE: B215284v2

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on June 30, 2021. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

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

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

Kind Regards,

Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP®
TESTING
NVLAP LAB CODE 101768-0

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AMENDED

ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

PAC ENVIRONMENTAL SPECIALISTS

CLIENT PROJECT: 211-305 Walnut St. - Building 2, 21231

LAB CODE: B215284v2

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

REPORT DATE: 07/02/21

TOTAL SAMPLES ANALYZED: 4

SAMPLES >1% ASBESTOS: 5

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AMENDED

Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: 211-305 Walnut St. - Building 2, 21231 **LAB CODE: B215284v2**

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
B 2-01		B87707A	Brown	Floor Tile	Chrysotile 5%
		B87707B	Black	Mastic	Chrysotile 3%
B 2-02		B87708A	Green	Sheet Flooring	Chrysotile 25%
		B87708B	Yellow	Mastic	Chrysotile 3%
B 2-03		B87709	White	Sheetrock	None Detected
B 2-04		B87710A	White,Tan	Ceiling Tile	None Detected
		B87710B	Brown,Gray	Adhesive	Chrysotile 3%

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AMENDED

ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215284v2
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 2, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B 2-01 B87707A	Floor Tile	Heterogeneous Brown Non-fibrous Bound			95%	Vinyl	5% Chrysotile
B87707B	Mastic	Heterogeneous Black Non-fibrous Bound	3%	Cellulose	90% 4%	Mastic Silicates	3% Chrysotile
B 2-02 B87708A	Sheet Flooring	Heterogeneous Green Non-fibrous Bound			50% 25%	Vinyl Binder	25% Chrysotile
B87708B	Mastic	Heterogeneous Yellow Non-fibrous Bound			97%	Mastic	3% Chrysotile
Lab Notes: Analyst opinion: Mastic is thin; Possible contamination from adjacent layer.							
B 2-03 B87709	Sheetrock	Heterogeneous White Fibrous Bound	10% 5%	Cellulose Fiberglass	75% 10%	Gypsum Paint	None Detected
B 2-04 B87710A	Ceiling Tile	Heterogeneous White,Tan Fibrous Bound	85%	Cellulose	5% 10%	Binder Paint	None Detected
B87710B	Adhesive	Heterogeneous Brown,Gray Bound	5%	Cellulose	92%	Mastic	3% Chrysotile

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

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

REPORTING LIMIT: <1% by visual estimation

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

REGULATORY LIMIT: >1% by weight

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

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

ANALYST: Taylor B. Metcalf

APPROVED BY: Tianbao Bai, Ph.D., CIH
Laboratory Director

AMENDED due to Laboratory Typographical Error - Omitted sample information

NVLAP® TESTING
NVLAP LAB CODE 101768-0

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CHAIN OF CUSTODY

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

LAB USE ONLY:
CEI Lab Code: B25284 (2)
CEI Lab I.D. Range: B87707 - B87710

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #: 24123	Job Contact: Miranda Wilson
Company: PAC Environmental Specialists, LLC	Email / Tel: miranda@pacenvironmental.com
Address: PO Box 689	Project Name: 211 - 305 Walnut St. - Building 2
Swartz, LA 71281	Project ID#: 21231
Email: miranda@pacenvironmental.com	PO #: 21231
Tel: 318-345-0889 Fax: 318-345-0859	STATE SAMPLES COLLECTED IN:

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

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

REMARKS / SPECIAL INSTRUCTIONS:

☒ Accept Samples
☐ Reject Samples

Relinquished By:	Date/Time	Received By:	Date/Time
Mary Cooper	6-29-21 / 1246	Smf	6/30 9:40

Samples will be disposed of 30 days after analysis

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SAMPLING FORM

B215284

COMPANY CONTACT INFORMATION	
Company: PAC Environmental Specialists, LLC	Job Contact: Miranda Wilson
Project Name: 211-305 Walnut St. - Building 2	
Project ID #: 21231	Tel: 318-345-0889

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
B2-01	Floor tile / throughout front		PLM [X]	TEM [ ]
B2-02	Sheet Flooring / Hallway		PLM [X]	TEM [ ]
B2-03	Sheet Rock / wall		PLM [X]	TEM [ ]
B2-04	Ceiling Tile / throughout front		PLM [X]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
			PLM [ ]	TEM [ ]
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Bunting, Connor

From: mary pacenvironmental.com <mary@pacenvironmental.com>
Sent: Tuesday, July 06, 2021 2:43 PM
To: CEI - Reporting
Subject: error in report

Follow Up Flag: Follow up
Flag Status: Flagged

EXTERNAL EMAIL*

Good afternoon,

This e-mail is referencing:

Client Project:211 – Walnut St. – Building 2, 21231

CEI Lab Code: B215284

Sample B2-02 is actually green in color. The report says black.

Can you please send an amended report?

Thanks!

Mary Cooper

Toxicologist

PAC Environmental Specialist

1011 Hwy. 139

Monroe, LA 71203

Office: (318) 345-0889

Mobile: (678) 920-8360

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July 2, 2021

PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

CLIENT PROJECT: 211-305 Walnut St. - Building 3, 21231
CEI LAB CODE: B215285

Dear Customer:

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on June 30, 2021. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600 Method.

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

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

Kind Regards,

Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP®
TESTING
NVLAP LAB CODE 101768-0

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ASBESTOS ANALYTICAL REPORT
By: Polarized Light Microscopy

Prepared for

PAC ENVIRONMENTAL SPECIALISTS

CLIENT PROJECT: 211-305 Walnut St. - Building 3, 21231

LAB CODE: B215285

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

REPORT DATE: 07/02/21

TOTAL SAMPLES ANALYZED: 12

SAMPLES >1% ASBESTOS: 6

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Asbestos Report Summary

By: POLARIZING LIGHT MICROSCOPY

PROJECT: 211-305 Walnut St. - Building 3, 21231 **LAB CODE: B215285**

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

Client ID	Layer	Lab ID	Color	Sample Description	ASBESTOS %
B3-01	Layer 1	B87711	White	HVAC Insulation	Chrysotile 65%
	Layer 2	B87711	Tan	HVAC Insulation	None Detected
B3-02		B87712	Tan,Black	Hvac Joint Cloth	None Detected
B3-03		B87713	White,Cream	Window Caulking	None Detected
B3-04		B87714	White	Surface Material	None Detected
B3-05		B87715A	Cream,Black	Acoustic Tile	None Detected
		B87715B	Brown	Mastic	None Detected
B3-06		B87716A	Cream,Brown	Ceiling Tile	None Detected
		B87716B	Brown	Mastic	None Detected
B3-07		B87717	Beige	Plaster	None Detected
B3-08	Layer 1	B87718	Cream	Texture	Chrysotile 2%
	Layer 2	B87718	White	Sheetrock	None Detected
B3-09		B87719A	Green	Floor Tile	Chrysotile 5%
		B87719B	Black	Mastic	Chrysotile 3%
B3-10		B87720A	Dark Brown	Floor Tile	Chrysotile 3%
		B87720B	Black	Mastic	None Detected
B3-11		B87721	Cream	Insulation	None Detected
B3-12		B87722A	Cream,Brown	Ceiling Tile	None Detected
		B87722B	Brown	Mastic	Chrysotile 5%

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215285
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 3, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B3-01 Layer 1 B87711	HVAC Insulation	Homogeneous White Fibrous Bound	15%	Cellulose	20%	Binder	65% Chrysotile
Layer 2 B87711	HVAC Insulation	Homogeneous Tan Fibrous Loosely Bound	100%	Cellulose			None Detected
B3-02 B87712	Hvac Joint Cloth	Heterogeneous Tan,Black Fibrous Loosely Bound	85%	Cellulose	15%	Binder	None Detected
B3-03 B87713	Window Caulking	Heterogeneous White,Cream Fibrous Bound	<1%	Cellulose	2% 98%	Paint Caulk	None Detected
B3-04 B87714	Surface Material	Homogeneous White Fibrous Bound	2%	Cellulose	98%	Binder	None Detected
B3-05 B87715A	Acoustic Tile	Heterogeneous Cream,Black Fibrous Bound	<1%	Cellulose	3% 97%	Paint FOAMGLASS	None Detected
B87715B	Mastic	Homogeneous Brown Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215285
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 3, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B3-06 B87716A	Ceiling Tile	Heterogeneous Cream,Brown Fibrous Loosely Bound	95%	Cellulose	5%	Paint	None Detected
B87716B	Mastic	Homogeneous Brown Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
B3-07 B87717	Plaster	Heterogeneous Beige Fibrous Bound	<1%	Cellulose	3% 60% 37%	Paint Binder Silicates	None Detected
B3-08 Layer 1 B87718	Texture	Heterogeneous Cream Fibrous Bound	2%	Cellulose	3% 78% 15%	Paint Calc Carb Binder	2% Chrysotile
Layer 2 B87718	Sheetrock	Heterogeneous White Fibrous Bound	10%	Cellulose	90%	Gypsum	None Detected
B3-09 B87719A	Floor Tile	Homogeneous Green Fibrous Bound	2%	Cellulose	60% 33%	Vinyl Calc Carb	5% Chrysotile
B87719B	Mastic	Homogeneous Black Fibrous Bound	2%	Cellulose	60% 35%	Mastic Calc Carb	3% Chrysotile

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ASBESTOS BULK ANALYSIS

By: POLARIZING LIGHT MICROSCOPY

Client: PAC ENVIRONMENTAL SPECIALISTS
P.O. Box 689
Swartz, LA 71281

Lab Code: B215285
Date Received: 06-30-21
Date Analyzed: 07-02-21
Date Reported: 07-02-21

Project: 211-305 Walnut St. - Building 3, 21231

ASBESTOS BULK PLM, EPA 600 METHOD

Client ID / Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS Fibrous		Non-Fibrous		ASBESTOS %
B3-10 B87720A	Floor Tile	Homogeneous Dark Brown Fibrous Bound	10%	Cellulose	57% 30%	Vinyl Calc Carb	3% Chrysotile
B87720B	Mastic	Homogeneous Black Fibrous Bound	2%	Cellulose	60% 38%	Mastic Calc Carb	None Detected
B3-11 B87721	Insulation	Homogeneous Cream Fibrous Loose	100%	Fiberglass			None Detected
B3-12 B87722A	Ceiling Tile	Heterogeneous Cream,Brown Fibrous Loosely Bound	95%	Cellulose	5%	Paint	None Detected
B87722B	Mastic	Homogeneous Brown Fibrous Bound	2%	Cellulose	60% 33%	Mastic Calc Carb	5% Chrysotile

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

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

REPORTING LIMIT: <1% by visual estimation

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

REGULATORY LIMIT: >1% by weight

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

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

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

ANALYST: Shilpa Ladekar

APPROVED BY: Tianbao Bai, Ph.D., CIH
Laboratory Director

NVLAP® TESTING
NVLAP LAB CODE 101768-0

eurofins | CEI

CHAIN OF CUSTODY

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

LAB USE ONLY:
CEI Lab Code: B215785 (12)
CEI Lab I.D. Range: B87711 - B87722

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #: 24123	Job Contact: Miranda Wilson
Company: PAC Environmental Specialists, LLC	Email / Tel: miranda@pacenvironmental.com
Address: PO Box 689	Project Name: 211 - 305 Walnut St. - Building 3
Swartz, LA 71281	Project ID#: 21231
Email: miranda@pacenvironmental.com	PO #: 21231
Tel: 318-345-0889 Fax: 318-345-0859	STATE SAMPLES COLLECTED IN:

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

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

REMARKS / SPECIAL INSTRUCTIONS:

☑ Accept Samples
☐ Reject Samples

Relinquished By:	Date/Time	Received By:	Date/Time
	6-29-21 / 1253		6/30 9:40

Samples will be disposed of 30 days after analysis

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SAMPLING FORM

B215285

COMPANY CONTACT INFORMATION	
Company: PAC Environmental Specialists, LLC	Job Contact: Miranda Wilson
Project Name: 211-305 Walnut St. - Building 3	
Project ID #: 21231	Tel: 318-345-0889

SAMPLE ID#	DESCRIPTION / LOCATION	VOLUME/ AREA	TEST	
B3-01	HVAC Insulation		PLM ☒	TEM ☐
B3-02	HVAC Joint Cloth		PLM ☒	TEM ☐
B3-03	Window Caulking		PLM ☒	TEM ☐
B3-04	Surfacing Material / brick		PLM ☒	TEM ☐
B3-05	Acoustic Tile / Wall + Ceiling		PLM ☒	TEM ☐
B3-06	Ceiling Tile - Smooth		PLM ☒	TEM ☐
B3-07	Plaster / Wall		PLM ☒	TEM ☐
B3-08	Sheetrock / wall		PLM ☒	TEM ☐
B3-09	9x9 floor tile (top layer)		PLM ☒	TEM ☐
B3-10	12x12 floor tile (bottom layer)		PLM ☒	TEM ☐
B3-11	Insulation / office wall		PLM ☒	TEM ☐
B3-12	Ceiling Tile - Dotted		PLM ☒	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
			PLM ☐	TEM ☐
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			PLM ☐	TEM ☐
			PLM ☐	TEM ☐

APPENDIX E: INSPECTOR LDEQ CERTIFICATION

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

certifies that

Kadie R Wheat

Has complied with all requirements of the Louisiana Department of Environmental Quality and is authorized to perform the duties of

Asbestos Inspector

Accreditation No. MI192255

AI No. 192255

Date of Issuance April 22, 2021

Expiration May 21, 2022

Failure to comply with all applicable provisions of La. R.S. 2025.E. (1)(a) and La. R.S. 2025.F. (2)(a) may result in civil and/or criminal enforcement actions by the State.

Tonya Landry

Permit Support Services Division
Office of Environmental Services

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

certifies that

Mary Cooper

Has complied with all requirements of the Louisiana Department of Environmental Quality and is authorized to perform the duties of

Asbestos Inspector

Accreditation No. MI192256

AI No. 192256

Date of Issuance April 22, 2021

Expiration May 21, 2022

Failure to comply with all applicable provisions of La. R.S. 2025.E. (1)(a) and La. R.S. 2025.F. (2)(a) may result in civil and/or criminal enforcement actions by the State.

Tonya Landry

Permit Support Services Division
Office of Environmental Services

APPENDIX C – ALTEC ASBESTOS & LEAD SAMPLING REPORT, SEPTEMBER 3, 2021

ALTEC
ENVIRONMENTAL CONSULTING, LLC

September 3, 2021

Mr. Richard Moore
City of Monroe
Monroe, LA

RE: Asbestos & Lead Sampling
205, 209, 215 & 305 Walnut St., Monroe, LA
ALTEC Project No.: SA06937

Dear Mr. Moore:

ALTEC Environmental Consulting, LLC was retained by City of Monroe to collect asbestos bulk samples at the above-referenced locations, to be tested for asbestos-containing fibers. ALTEC asbestos inspectors Keith Callender and Jerry Heidecker performed the samplings. Two (2) samples were collected and these samples were found to be positive for asbestos-containing fibers. Below is a table showing the positive samples and results:

Sample ID	Material Description	Location	Asbestos % Type
CM-21-244-001	Layer 1 – Red 9x9 Floor Tile	Cover Alley East Entrance Center Room	8% Chrysotile
CM-21-244-002	Layer 1 - Red 9x9 Floor Tile	Covered Alley West Entrance Center Room	8% Chrysotile

The following recommendation is provided for the building owner dependent on the intended use of the property.

- **Floor Tile:** The floor tile is a Category I non-friable Asbestos-Containing Material. This material will have to be removed by a licensed abatement contractor before any renovation or demolition activities occur.

- If there is any other work within the residence, or if any other material within the residence is to be disturbed while the renovation or demolition is done then ALTEC recommends that a licensed asbestos inspector with the state of Louisiana conduct a full inspection of the residence for asbestos.

Limited Lead Based Paint Inspection

A Limited Lead Based Paint Inspection was conducted at the address referenced above on September 1, 2021. The inspection was performed by Jerry Heidecker, a Lead Risk Assessor certified in the State of Louisiana utilizing an RMD model LPA-1 XRF serial #1706. Calibrations were taken before starting the day and at the end of the day.

Thirty-eight (38) readings were obtained during the Limited Lead Inspection; six (6) of these readings were calibrations. None of the readings were above the HUD level of 1.0 mg/cm^2 and are considered to be lead-based paint.

ALTEC appreciates being able to provide these services to the City of Monroe. If you have any questions concerning this report or if we can be of further assistance to you in any other way, please contact me at (318) 687-3771.

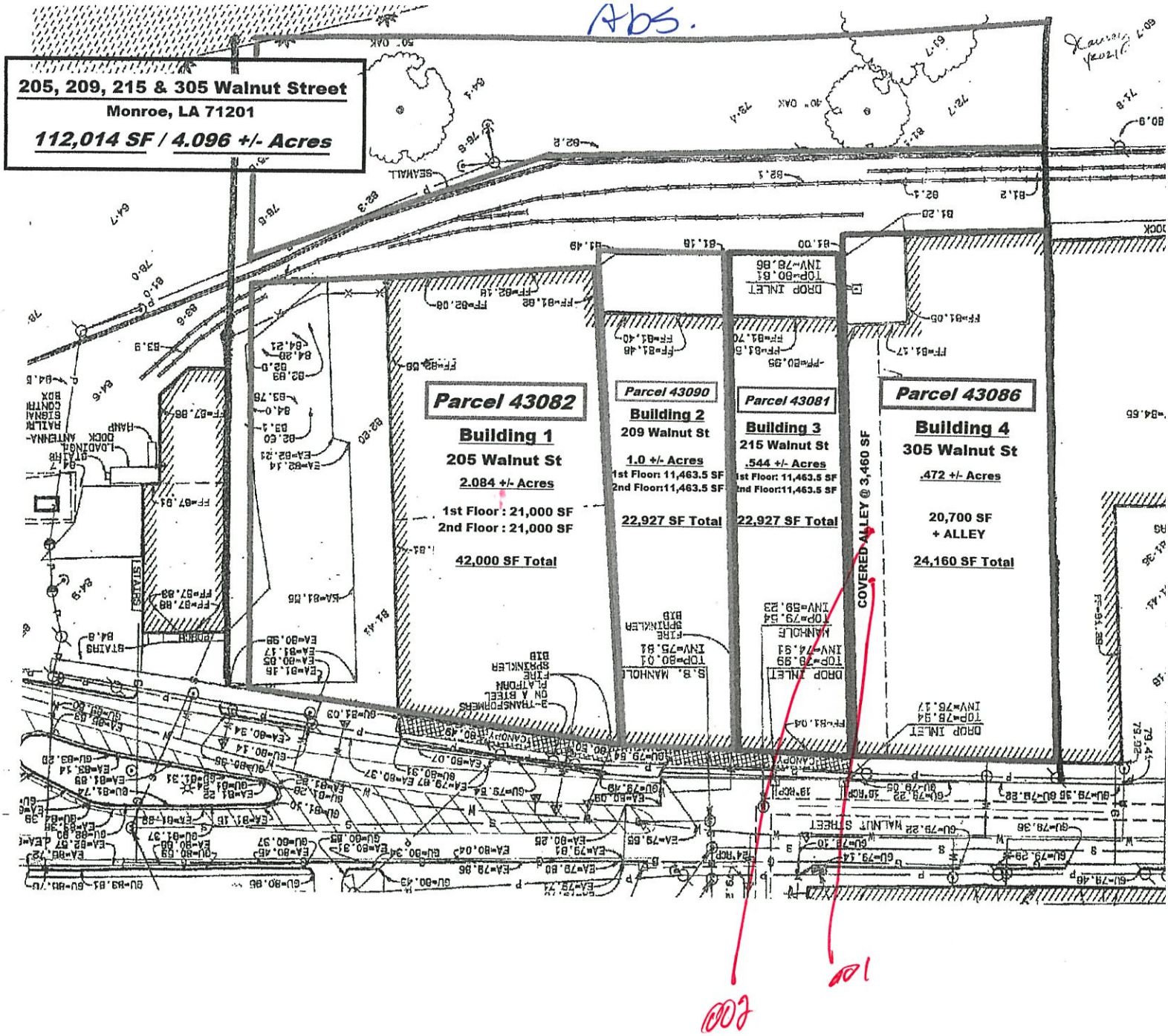
Sincerely,

Robert B. Raines, III P.E.
Vice President

Enclosures

SAMPLE LOCATION DRAWING(S)

ABS.



No Suspect material in building 2 for es bestos.

2nd Floor not inspected - deemed unsafe.

LABORATORY ANALYSIS REPORT

EMSL Analytical, Inc.

200 Route 130 North Cinnaminson, NJ 08077
Tel/Fax: (800) 220-3675 / (856) 786-5974
http://www.EMSL.com / cinnasblab@EMSL.com

EMSL Order:	042122062
Customer ID:	ALT50
Customer PO:	
Project ID:	

Attention: Justin Holcomb
ALTEC Environmental Consultants, Inc.
10100 Woolworth Road
Keithville, LA 71047

Phone:	(318) 687-3771
Fax:	(318) 687-9923
Received Date:	09/02/2021 9:45 AM
Analysis Date:	09/02/2021 - 09/03/2021
Collected Date:	09/01/2021

Project: SA06937 / City of Monroe Lead and Abs SXS / City of Monroe

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
CM-21-244-001-Floor Tile *042122062-0001*	Covered Alley East Entrance Center Room - Red 9x9 Floor Tile	Red Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
CM-21-244-001-Mastic *042122062-0001A*	Covered Alley East Entrance Center Room - Black Mastic	Black Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
CM-21-244-002-Floor Tile *042122062-0002*	Covered Alley West Entrance Center Room - Red 9x9 Floor Tile	Red Non-Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile
CM-21-244-002-Mastic *042122062-0002A*	Covered Alley West Entrance Center Room - Black Mastic	Black Non-Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected

Analyst(s)
Alex Francois (2)
Nancy Stalter (2)

Samantha Rundstrom, Laboratory Manager
or Other Approved Signatory

Initial report from: 09/03/2021 07:26:24

OrderID: 042122062

CHAIN-OF-CUSTODY RECORD AND ANALYSIS REQUEST

ALTEC ENVIRONMENTAL CONSULTING
P.O. BOX 17867
SHREVEPORT, LA 71138-0867
10100 WOOLWORTH ROAD
KEITHVILLE, LA 71047
Phone # (318) 687-3771
Fax # (318) 687-9923

ALTEC ENVIRONMENTAL CONSULTING, LLC

RECEIVED EMSL CINNAMINSON, N.J. 2021 SEP -2 AM 10: 11

Project Number: SA06937	Project Manager: Justin L. Holcomb
Project Name: City of Monroe Lead & Abs Sys.	ALTEC's Client: City of Monroe
Date: 9/1/21	

Email results to: justin.holcomb@altecenv.com; tana.walsh@altecenv.com

Fed Ex No. 7961 7966 4710

ANALYSIS METHOD	TURNAROUND TIME					
INTERIM METHOD PLM	3 hours	6 hours	24 hours	2 days	3 days	
POINT COUNT - (NESHAPS) PLM	3 hours	6 hours	24 hours	2 days	3 days	

SAMPLE NUMBER	SAMPLE LOCATION AND DESCRIPTION
Cm-21-244-001	See enclosed inspection log.
Cm21-244-002	"

(2)

Relinquished by:	Date:	Time:	Received by:	Date:	Time:
[signature]	9/1/21	16:30	[signature]	9-2-21	9:45
Relinquished by:	Date:	Time:	Received by:	Date:	Time:

Send to: EMSL Analytical, Inc. - 200 Route 130 North, Cinnaminson, New Jersey 08077
Phone:(800) 220-3675 Fax: (856) 786-5974

042122062

Proj.# SA06937

ASBESTOS INSPECTION LOG

ALTEC ENVIRONMENTAL CONSULTING, LLC

PAGE 1 of 1

DATE: 9/1/21

Facility: City of Monroe

Address/Location: 205, 209, 215, 305 Walnut St. Monroe, LA

Inspector(s): JH HKC

Sample ID	Photo	Material Description	Category	Friability	Condition	Location
CM-21-244-001	1	Red 9x9 FT w/ black Mastic	M	NF	8	Covered alley East entrance Center room
CM-21-244-002	2	Red 9X9 FT w/ black mastic	M	NF	8	Covered alley West entrance Center room

RECEIVED EMSL CINNAMINSON, N.J. 2021 SEP -2 AM 10:11

N=North S=South E=East W=West NE=Northeast NW=Northwest SE=Southeast SW=Southwest NS=North Side SS=South Side ES=East Side WS=West Side
Quad=Quadrant '=foot "=inch Hz=Horizontal Pipe Run Vt=Vertical Pipe Run Ins=Insulation FG=Fiberglass Vib=Vibration w/=with Bldg=Building Rm=Room Ent=Entrance
CT=Ceiling Tile FT=Floor Tile CM=Cove Molding Blk=Black Brn=Brown Grn=Green Wht=White Ylw=Yellow Lt=Light Dk=Dark SA=Same As

Material Category: T=TSI S=Surfacing M=Miscellaneous **Friability:** F=Friable NF=Non-Friable **Condition:** Good = 8, 9, 10 Fair = 4, 5, 6, 7 Poor = 1, 2, 3

GOOD = Surfacing material has no visible damage or small amounts of damage; covering on thermal system insulation is intact or has small amounts of damage; miscellaneous materials intact; no visible debris or small amounts of debris. FAIR = Surfacing material has moderate but not extensive amounts of visible damage; covering on thermal system insulation is cut or torn, exposing moderate but not extensive amounts of insulation; moderate but not extensive damage to miscellaneous materials such as floor tile; moderate but not extensive amounts of visible dust and debris. POOR = Extensive damage to surfacing material; covering on thermal system insulation is cut or torn extensively and insulation itself is damaged; miscellaneous materials such as floor tile extensively damaged and underlying mastic exposed; extensive amounts of dust and debris.

Rev. 4/2010

LEAD TABLE

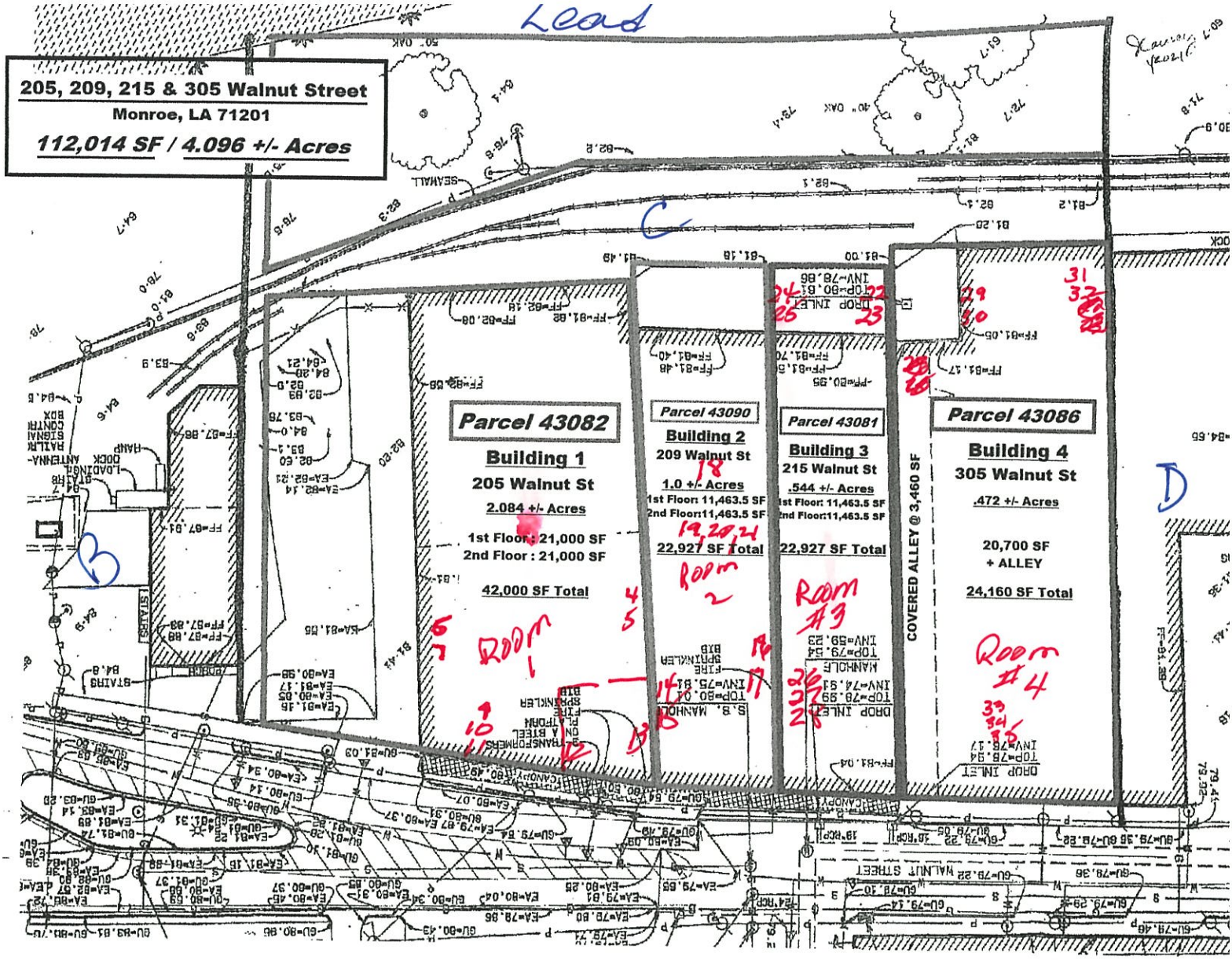
Lead Inspection Results
City of Monroe
205, 209, 215 & 305 Walnut Street, Monroe, Louisiana

Start Date: 09/1/21 **End Date: 09/1/21** **Lead Inspector: Jerry Heidecker**
Start Time: 08:45.00 **End Time: 11:46.00** **XRF Serial #1706** **Project No. SA06937**

Reading No.	XRF Result (mg/cm^2)	Room Number	Wall Orientation	Component	Component Location	Component Information	Condition	Substrate	Color	Results
Interior Samples										
1	1.2		Calibration							
2	1.1		Calibration							
3	1		Calibration							
4	-0.2	1	B	Wall	U Ctr		I	Brick	White	Negative
5	0.4	1	B	Wall	L Ctr		I	Brick	Green	Negative
6	0.4	1	B	Wall	L Ctr		I	Brick	Green	Negative
7	-0.2	1	B	Wall	U Ctr		I	Brick	White	Negative
8	-0.2	1	-	Ceiling	Ctr		I	Wood	White	Negative
9	-0.2	1	C	Door	Ctr		I	Wood	White	Negative
10	-0.3	1	C	Door	Ctr	Rgt jamb	I	Wood	White	Negative
11	-0.2	1	C	Door	Ctr	Casing	I	Wood	White	Negative
12	-0.3	1	B	Wall	W Ctr		I	Dry wall	White	Negative
13	-0.4	1	D	Wall	W Ctr		I	Dry wall	White	Negative
14	-0.3	2	B	Wall	U Ctr	Member	I	Brick	White	Negative
15	0.6	2	B	Wall	L Ctr		I	Brick	Green	Negative
16	-0.4	2	D	Wall	L Ctr		I	Brick	Green	Negative
17	-0.2	2	D	Wall	U Ctr		I	Brick	White	Negative
18	-0.1	2	-	Ceiling	Ctr		I	Brick	White	Negative
19	0.3	2	A	Door	Ctr		I	Wood	Green	Negative
20	-0.3	2	A	Door	Ctr	Inside jamb	I	Wood	Green	Negative
21	-0.3	2	A	Door	Ctr	Casing	I	Wood	Green	Negative
22	-0.1	3	D	Wall	U Ctr		I	Brick	White	Negative
23	-0.5	3	D	Wall	L Ctr		I	Brick	Green	Negative

Reading No.	XRF Result (mg/cm^2)	Room Number	Wall Orientation	Component	Component Location	Component Information	Condition	Substrate	Color	Results
24	-0.7	3	B	Wall	L Ctr		I	Brick	Green	Negative
25	-0.5	3	B	Wall	U Ctr		I	Brick	White	Negative
26	0	3	B	Door	Ctr		I	Wood	Green	Negative
27	0.2	3	B	Door	Ctr	Inside jamb	I	Wood	Green	Negative
28	0.4	3	B	Door	Ctr	Casing	I	Wood	Green	Negative
29	-0.4	4	B	Wall	L Ctr		I	Brick	Green	Negative
30	-0.4	4	B	Wall	U Ctr		I	Brick	White	Negative
31	-0.7	4	D	Wall	U Ctr		I	Brick	White	Negative
32	-0.7	2	D	Wall	L Ctr		I	Brick	Green	Negative
33	0.2	4	D	Door	Ctr		I	Wood	Yellow	Negative
34	0.1	4	D	Door	Ctr	Inside jamb	I	Wood	Yellow	Negative
35	0.4	4	D	Door	Ctr	Casing	I	Wood	Yellow	Negative
36	0.9		Calibration							
37	0.9		Calibration							
38	0.9		Calibration							

LEAD LOCATION DRAWING(S)



East end of building 1 has 9x9 FT + black mastic

2nd floor is unstable and unsafe, not surveyed. as per Client.

Ceiling not painted in in room #3 + #4

Unit # 1

09-01-21-0843

PHOTOGRAPH(S)

CITY OF MONROE
205, 209, 215 & 305 WALNUT ST., MONROE, LA
SEPTEMBER 3, 2021

CM-21-244-001

CM-21-244-002

sample contains asbestos
sample does not contain asbestos
non-asbestos containing material determined by point count

CERTIFICATIONS

STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Is hereby granting a Louisiana Environmental Laboratory Accreditation to

EMSL Analytical Inc
200 Rt 130 N
Cinnaminson, New Jersey 08077

Agency Interest No. 131900
Activity No. ACC20210001

According to the Louisiana Administrative Code, Title 33, Part I, Subpart 3, LABORATORY ACCREDITATION, the State of Louisiana formally recognizes that this laboratory is technically competent to perform the environmental analyses listed on the scope of accreditation detailed in the attachment.

The laboratory agrees to perform all analyses listed on this scope of accreditation according to the Part I, Subpart 3 requirements and agrees to adapt to any changes in the requirements. It also acknowledges that continued accreditation is dependent on successful ongoing compliance with the applicable requirements of Part I and the 2009 TNI Standard by which the laboratory was assessed. Please contact the Department of Environmental Quality, Louisiana Environmental Laboratory Accreditation Program (LELAP) to verify the laboratory's scope of accreditation and accreditation status.

Accreditation by the State of Louisiana is not an endorsement or a guarantee of validity of the data generated by the laboratory. Accreditation of the environmental laboratory does not imply that a product, process, system, or person is approved by LELAP. To be accredited initially and maintain accreditation, the laboratory agrees to participate in two single-blind, single-concentration PT studies, where available, per year for each field of testing for which it seeks accreditation or maintains accreditation as required in LAC 33:I.4711.

Cheryl Sonnier Nolan
Administrator
Public Participation and Permit Support Services Division

Issued Date: 30 April 2021

Effective Date: July 1, 2021
Expiration Date: June 30, 2022
Certificate Number: 04127

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

certifies that

Jerald Heidecker

Has complied with all requirements of the Louisiana Department of Environmental Quality and is authorized to perform the duties of

Asbestos Inspector

Accreditation No. **JI166471**

AI No. **166471**

Date of Issuance **January 4, 2021**

Expiration **January 4, 2022**

Failure to comply with all applicable provisions of La. R.S. 2025.E. (1)(a) and La. R.S. 2025.F. (2)(a) may result in civil and/or criminal enforcement actions by the State.

Tonya Landry

Permit Support Services Division
Office of Environmental Services

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

certifies that

Jerald Heidecker

Has complied with all requirements of the Louisiana Department of Environmental Quality and is authorized to perform the duties of

Lead Risk Assessor

Accreditation No. JR166471

AI No. 166471

Date of Issuance January 12, 2021

Expiration January 14, 2022

Failure to comply with all applicable provisions of La. R.S. 2025.E. (1)(a) and La. R.S. 2025.F. (2)(a) may result in civil and/or criminal enforcement actions by the State.

Tonya Landry

Public Participation & Permit Support Division
Office of Environmental Services