

CO USE ONLY:
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LAW ENFORCEMENT INVESTIGATORY RECORD



Cleveland Division of Air Quality
CO Enforcement Action Request

OHIO ENVIRONMENT PROTECTION AGENCY
Division of Air Pollution Control

ASBESTOS DEMOLITION/RENOVATION ENFORCEMENT ACTION
REQUEST

DATE: August 12, 2010
TO: Drew Bergman, Legal Office
FROM: Mike Samec, CDAQ
THROUGH: Jim Orlemann, Air CO EC Contact

RECEIVED _____

1. An enforcement action should be requested for each substantive violation of the Nation Emission Standards for Hazardous Air Pollutants (NESHAP) and for any multiple violations regarding late or incomplete notice.
2. All evidence supporting the facts pertaining to the violations must be obtained and submitted with this request. Types of evidence includes, but is not limited to, all relevant correspondence, phone logs, monitoring data, photographs, sample results, inspection reports, notifications, postmarked envelopes, permit terms and conditions, and all other information directly relating to the violations.
3. All items in this enforcement action request must be complete to the fullest possible extent and submitted in as timely a manner as possible.
4. For violations of the Asbestos NESHAP, a Notice of Violation (NOV) in accordance with guidelines distributed 5/13/89 must be sent as soon as possible in an attempt to bring operations into compliance. Under the delegation of authority, all substantive violations of NESHAP must receive enforcement action; therefore, first violations are to be enforced. A copy of the NOV letter and a summary of the actions taken by the source to come into compliance with the NESHAP must be attached.

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CO Enforcement Action Request

This site is the subject of a concurrent investigation separately done and conducted by Special Agent, Brad T. Ostendorf, U.S. Environmental Protection Agency, Office of Criminal Enforcement and BCI Special Agent, Doug Young, Ohio Bureau of Criminal Identification and Investigation.

1) General information concerning the facility (owners):

- a) Name: Harper Industries, Inc.
- b) Facility Address: 10101 Woodland Ave.
- c) County: Cuyahoga
- d) Responsible Company Personnel:

<u>Name</u>	<u>Title</u>	<u>Phone Number</u>
Jim Hyland	Owner	[REDACTED]
Steven Hyland	Owner	[REDACTED]

- e) Type of facility: (Check one)
Public ___ Commercial ___ Industrial X School ___

- f) Type of operation: (Check one)
Renovation [] Demolition [X] Disposal Site []

2) General information concerning the contractors (operator):

- a) Demolition:
 - i) Name: Harper Industries, Inc.
 - ii) Address: 947 East Johnstown, Suite 158
 - iii) City/County: Gahanna, Oh 43230
 - iv) Responsible company personnel (include names of all supervisors and company officials contacted or reported to be present at the time of violation):

<u>Name/Title</u>	<u>Phone</u>
Jim Hyland	[REDACTED]
Steven Hyland	[REDACTED]

- v) Contractor license # OH 1575128

b) General Contractor:

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- i) Name: N/A
- ii) Address: N/A
- iii) City/County: N/A
- iv) Responsible company personnel (include names of all supervisors and company officials contacted or reported to be present at the time of violation)

<u>Name/Title</u>	<u>Phone</u>
N/A	

- v) Contractor license # OH
N/A

3) List any additional responsible parties and their relationship to operations:

Frank Byszewski Business Partner/Worker [REDACTED]

4) General description of violation(s):

- a) Include a brief description of the violation and a statement of how long or how often the violation has occurred and the response to the Notice of Violation. Describe the total quantities of asbestos material involved and the percentage removed at the time of violation:

- i) Violation description narrative: All RACM listed on the notification was not abated and the actual amount of ACM located in the building and debris piles is unknown. 20-30% of the buildings at this site were torn down and the debris was scattered throughout the property or placed into debris piles.

- ii) Dates and times violations were observed: CDAQ's first site visit was January 27, 2010, after that there were numerous site visits and scheduled meetings from January through July of 2010.

- iii) Response to NOV and willingness to comply: CDAQ received response letters from Steven Hyland (see attachment 9 and 10), copies of scope of work (see attachment 7), and multiple revised notifications (see attachments 13, 14, and 15). Harper Industries, Inc. has given two different clean-up start dates but no efforts were made to remediate the site. The last revised notification lists the asbestos removal completion date by June 30, 2010, and the demolition completion date by July 30, 2010 (see attachment 15).

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LAW ENFORCEMENT INVESTIGATORY RECORD

- iv) **Total quality of asbestos in facility:** The last revised Notification (see attachment 15) lists 4,000 linear feet of pipe insulation, 2,500 sq. ft. of transite, and 65,800 sq. ft. of floor tile.
 - v) **Amount of asbestos removed at time of inspection:** During the January 27, 2010, inspection there was no abatement conducted.
 - vi) **Method of measurement:** Notification (see attachment 2, 13, 14, and 15) and the Asbestos survey (see attachment 1).
 - vii) **Other witnesses to collection of evidence (ODH and Others):**
Bryan Sokolowski, CDAQ
Allan Richards, ODH
- b) **Specific citation of sections of Ohio and Federal regulatory code which are alleged to be violated and are the subject of this referral:**

<u>Regulatory Code Section</u>	<u>Date of Violation</u>
40 CFR Part 61.145(b)(4)(xi)	January 27, 2010
40 CFR Part 61.145(c)(1)	January 27, 2010
40 CFR Part 61.145(c)(3)	January 27, 2010
40 CFR Part 61.145(c)(6)(i)	January 27, 2010
40 CFR Part 61.150(a)(1)(ii)	January 27, 2010
40 CFR Part 61.150(a)(1)(iii)	January 27, 2010
40 CFR Part 61.150(a)(1)(iv)	January 27, 2010
OAC Rule 3745-20-03(A)(4)(k)	January 27, 2010
OAC Rule 3745-20-04(A)(1)	January 27, 2010
OAC Rule 3745-20-04(A)(3)	January 27, 2010
OAC Rule 3745-20-04(A)(6)(a)	January 27, 2010
OAC Rule 3745-20-05(B)(1)(b)	January 27, 2010
OAC Rule 3745-20-05(B)(1)(c)	January 27, 2010

- c) **Have there been complaints (or informants) from the public against this entity? Briefly describe the complaints and any alleged exposures or adverse health effects (names shall be confidential unless otherwise indicated):** N/A

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LAW ENFORCEMENT INVESTIGATORY RECORD**

- d) Are there extenuating circumstances or willful conduct which should be considered? (i.e. Would adequate wetting cause unavoidable damage or equipment? Are there any extenuating hazards present such as live steam, extreme heat or electrical components not neutralized? Was site access possible to restrict? Can prior knowledge of legal requirements be demonstrated?): Yes, Harper Industries, Inc. knew about the pipe insulation and transite located throughout the Woodland Ave. site. A full survey was completed prior to the start of demolition occurring (see attachment 1). The original asbestos contractor (JJK Environmental) hired to do the asbestos removal sent a letter to CDAQ (see attachment 6) stating they did not conduct any asbestos removal at the Woodland Ave. site. Steven Hyland, Harper Industries, Inc. signed the original Notification (see attachment 2). Mike Samec (ms) of CDAQ gave a detailed and extensive explanation of the requirements for asbestos removal for a prior project, CL 09 331, 10611 Quincy Ave., Cleveland, Ohio 44106.
- e) Describe the enforcement actions already taken against the entity for the violations, including any verbal warnings, letters, telephone calls, meetings, etc.): CDAQ (M. Samec) stated during the January 27, 2010, inspection that a Notice of Violation would be issued requiring immediate clean-up of the site. Two NOV's were issued, on March 12, 2010, (see attachment 8) and June 24, 2010 (see attachment 12). As of August 17, 2010, the 2nd Notice of Violation returned unclaimed because the company address has been changed. The 2nd Notice of Violation has been forwarded to Jim Hyland, Harper Industries, Inc. at 947 East Johnstown, Suite 158, Gahanna, Ohio 43230. During all telephone conversations from January through June 2010, with Jim and Steven Hyland, M. Samec commented about remediating the site.
- f) List in chronological order, number and attach copies of all correspondence memos, laboratory analyses, photographs, monitoring data, permits, etc. that relate to this violations (if analyses are not yet complete, these results will be attached at the Central Office):

Date:	Exhibit:	Event:
12/9/09	Exhibit 1	Asbestos Survey
12/9/09	Exhibit 2	Original Notification
12/23/09	Exhibit 3	City of Cleveland Department of Building & Housing Permit
1/27/10	Exhibit 4	Inspection Report
2/3/10	Exhibit 5	Asbestos Sample and Location Report
2/10/10	Exhibit 6	Faxed Letter from JJK Environmental Developmental LLC
3/1/10	Exhibit 7	March 1, 2010, Scope of Work

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Date:	Exhibit:	Event:
3/12/10	Exhibit 8	March 12, 2010, Notice of Violation
3/25/10	Exhibit 9	Response Letter from Harper Industries, Inc. #1
4/12/10	Exhibit 10	Email Response Letter from Steven Hyland of Harper Industries, Inc. #2
5/24/10	Exhibit 11	Scope of Work for the Decontamination of the Skid Steer
6/24/10	Exhibit 12	June 24, 2010, Second Notice of Violation
	Exhibit 13	1 st Revised Notification (Completion Date 1/15/10)
2/25/10	Exhibit 14	2 nd Revised Notification (Completion Date 3/30/10)
5/5/10	Exhibit 15	3 rd Revised Notification (Completion Date 6/30/10)

g) Describe emission control measures (adequate wetting, removal methods, collection methods, containerization and disposal) that are necessary to remedy the violation. Comment on the adequacy of enclosure, air exchange/filtration and decontamination facilities: ACM is mixed in with the building debris piles and all materials will have to go as RACM. No wet methods or control methods were witnessed during the initial visit. An estimated 300 linear feet of friable pipe insulation was disposed in a 40-yard dumpster. Plywood, chains, and locks were installed onto the site to keep the general public from entering. The site remains as a health threat to the general public.

h) Does this violation require additional clean up? (If so, describe recommended conditions for clean up.): Yes, all building debris materials must be abated and disposed as ACM. All friable pipe insulation and transite located throughout the site must be abated to remove the health threat from the general public.

5) Request for enforcement action:

a) Names and phone numbers of all Ohio EPA and local agency personnel with information on this entity or violation:

<u>Name/Agency</u>	<u>Phone Number</u>
Mike Samec, CDAQ	216-420-7682

b) What type of enforcement action is recommended?

Director's Findings and Orders with penalty

c) Comment on penalty mitigation or gravity augmentation:

Harper Industries, Inc. has stated numerous times they currently have no

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LAW ENFORCEMENT INVESTIGATORY RECORD

funding to implement clean-up of the site. As of July 28, 2010, the abatement company and consultant hired to work on this site have not been paid for the services provided.

Prepared by: Michael Samec Date: 8/12/2010
Mike Samec, Environmental Enforcement Specialist, CDAQ

Approved by: Linda Kimmy Date: 9/29/10
Linda Kimmy, Field Enforcement Manager, CDAQ

Approved by: George Baker Date: Sept. 29, 2010
George Baker, Chief of Enforcement, CDAQ

Approved by: Michael J. Krzywicki Date: 9/29/10
Michael J. Krzywicki, Commissioner, CDAQ

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DIVISION OF AIR POLLUTION CONTROL
ASBESTOS ENFORCEMENT ACTION REQUEST SUMMARY TABLE

<u>Operator / Responsible Party Name:</u> Harper Industries, Inc.		<u>Facility Address/Source Location:</u> 10101 Woodland Ave.	<u>DO/LAA:</u> Cleveland LAA <u>Contact Name:</u> Mike Samec <u>Telephone #:</u> 216-420-7682	<u>Multi-media Case (Y/N):</u> N <u>Divisions Involved:</u> CDAQ	
<u>Contact Name and Telephone #:</u> Jim Hyland 614-571-6099		<u>Operator / Responsible Party Address:</u> 947 East Johnstown, Suite 158 Gahanna, Oh 43230			
<u>Date Violation Discovered by CLAA</u>	<u>Rules/Laws Violated</u>	<u>Violation Description and Type of Supporting Evidence</u> (i.e. inspection, records, samples, photographs, etc.)	<u>Duration</u>		
			<u>From</u>	<u>To</u>	<u>total days</u>
January 27, 2010	40 CFR Part 61.145(b)(4)(xi) OAC Rule 3745-20-03(A)(4)(k)	Failing to describe work practices and engineering controls to be used to comply with requirements. (Inspection, records, samples, photographs)	1/27/10	Present	N/A
January 27, 2010	40 CFR Part 61.145(c)(1) OAC Rule 3745-20-04(A)(1)	Failing to remove all RACM from a facility being demolished before any activity begins that would break up, dislodge, or similarly disturb the material. (Inspection, records, samples, photographs)	1/27/10	Present	N/A
January 27, 2010	40 CFR Part 61.145(c)(3) OAC Rule 3745-20-04(A)(3)	Failing to adequately wet the RACM during the stripping operation. (Inspection, records, samples, photographs)	1/27/10	Present	N/A
January 27, 2010	40 CFR Part 61.145(c)(6)(i) OAC Rule 3745-20-04(A)(6)(a)	Failing to adequately wet the RACM and ensure that it remains wet until collected and contained or treated in preparation for disposal. (Inspection, records, samples, photographs)	1/27/10	Present	N/A
January 27, 2010	40 CFR Part 61.150(a)(1)(ii) OAC Rule 3745-20-05(B)(1)(b)	Failing to discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations. (Inspection, records, samples, photographs)	1/27/10	Present	N/A
January 27, 2010	40 CFR Part 61.150(a)(1)(iii) OAC Rule 3745-20-05(B)(1)(c)	Failing to seal all asbestos-containing waste material in leak-tight containers while wet. (Inspection)	1/27/10	Present	N/A

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<u>Operator / Responsible Party Name:</u> Harper Industries, Inc.		<u>Facility Address/Source Location:</u> 10101 Woodland Ave.		<u>DO/LAA:</u> Cleveland LAA		<u>Multi-media Case (Y/N):</u> N	
<u>Contact Name and Telephone #:</u> Jim Hyland 614-571-6099		<u>Operator / Responsible Party Address:</u> 947 East Johnstown, Suite 158 Gahanna, Oh 43230		<u>Contact Name:</u> Mike Samec		<u>Divisions Involved:</u> CDAQ	
January 27, 2010		40 CFR Part 61.150(a)(1)(iv)		Failing to label the containers using warning labels specified by OSHA standards. (Inspection and photographs)		1/27/10	
Present		N/A					
<u>DO/LAA Action</u> (NOV, warning letter, verbal warning, etc.)	<u>Date</u>	<u>Responses Received</u> (dates)	<u>Action Required to Correct Violations</u>	<u>Corrective Action Costs</u> (i.e. additional controls)		<u>Current Compliance Status</u>	
NOV	March 12, 2010	March 25, 2010, April 12, 2010	Yes, entire site needs to be abated	N/A	\$136,500 to \$138,500 See Comments	Non-Compliance	
2 nd NOV See comments	June 24, 2010 August 17, 2010	N/A	Yes, entire site needs to be abated	N/A	See Comments	Non-Compliance	
<u>Comments/Notes:</u> In the Asbestos Inspection Report (Exhibit 1), JP Consulting provided an estimate of \$134,000 for asbestos abatement, plus \$2,500 to \$4,500 for project design and specifications, monitoring, final visual inspection, and final written report. Estimate may change if site conditions change (due to vandalism, etc.) The 2 nd NOV was unclaimed because the company relocated to a new address. The same letter has been sent to Jim Hyland instead of Steven Hyland.							
<u>Date:</u>	<u>Exhibit:</u>	<u>Event:</u>					
12/9/09	Exhibit 1	Asbestos Survey					
12/9/09	Exhibit 2	Original Notification					
12/23/09	Exhibit 3	City of Cleveland Department of Building & Housing Permit					
1/27/10	Exhibit 4	Inspection Report					
2/3/10	Exhibit 5	Asbestos Sample and Location Report					
2/10/10	Exhibit 6	Faxed Letter from JJK Environmental Developmental LLC					

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<u>Operator / Responsible Party Name:</u> Harper Industries, Inc.		<u>Facility Address/Source Location:</u> 10101 Woodland Ave.	<u>DO/LAA:</u> Cleveland LAA	<u>Multi-media Case (Y/N):</u> N
<u>Contact Name and Telephone #:</u> Jim Hyland 614-571-6099		<u>Operator / Responsible Party Address:</u> 947 East Johnstown, Suite 158 Gahanna, Oh 43230	<u>Contact Name:</u> Mike Samec	<u>Divisions Involved:</u> CDAQ
			<u>Telephone #:</u> 216-420-7682	
3/1/10	Exhibit 7	March 1, 2010, Scope of Work		
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5/5/10	Exhibit 15	3 rd Revised Notification (Completion Date 6/30/10)		

Exhibit 1: Asbestos Survey



**ASBESTOS INSPECTION REPORT
FOR THE VICTOREEN BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO**

Prepared for:

Harper Industries, Inc.
4579 Poth Rd.
Columbus, Ohio 43213

Prepared by:

JP Consulting
190 Corunna Ave.
Fairlawn, Ohio 44333

Date Issued:
December 9, 2009



**ASBESTOS INSPECTION REPORT
FOR THE VICTOREEN BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO**

TABLE OF CONTENTS

SECTION I - INSPECTION REPORT SUMMARY

**SECTION II - ABATEMENT RECOMMENDATIONS
AND COST ESTIMATES**

SECTION III

- SITE DRAWING A
- AERIAL PHOTOGRAPH
- DRAWING - BUILDING 1 BASEMENT
- DRAWING - BUILDING 1 FIRST FLOOR
- DRAWING - BUILDING 1 2ND FLOOR
- DRAWING - BUILDING 1 3RD FLOOR
- DRAWING - BUILDING 1 4TH FLOOR
- DRAWING - BUILDING 1 ROOF
- DRAWING - BUILDINGS 2 AND 6
- DRAWING - BUILDINGS 5 AND 4
- FIELD SAMPLE LOGS
- LAB REPORTS
- INSPECTOR'S CERTIFICATION

Inspector's Certification:

Signature: _____ Date: _____

James Prarat
Asbestos Hazard Evaluation Specialist
ODH Cert. #3073

SECTION I - INSPECTION REPORT SUMMARY

The building complex that was inspected for asbestos is located at 10101 Woodland Ave. in Cleveland, Ohio. At the time of this inspection, the building complex included 5 unique buildings identified as #1, #2, #4, #5 and #6. Refer to Site Drawing A in Section III of this report. Drawing A shows where each of the 5 buildings is located at the building complex. Drawing A shows a Building #3, but Building #3 no longer existed at the time of this inspection. Section III also includes an AERIAL PHOTOGRAPH of the 5 buildings that were inspected for asbestos.

The entire building complex was inspected and tested for asbestos. Section III of this report includes sampling documentation and lab reports, plus the Inspector's certification documents. All 5 buildings are planned to be demolished. The original building date was not known, but is estimated at 1945-1955. It is assumed that the entire building complex was constructed during that time, and it appears that there have been no significant additions or interior renovations after the original construction.

The inspection was conducted by James Prarat of **JP CONSULTING** on the following dates in 2009: November 23-28. Mr. Prarat is certified with the Ohio Department of Health as an Asbestos Hazard Evaluation Specialist, Cert. #3073. The asbestos inspection was coordinated through Mr. Steve Hyland of Harper Industries. Regulations from EPA and OSHA require that any building that is planned to undergo renovation work or demolition work must be inspected for asbestos before the renovation or demolition work takes place.

Asbestos-containing material (ACM) is defined by OSHA and the EPA as any material that contains over 1% asbestos. The EPA-recommended analysis method for suspect asbestos-containing samples is **Polarized Light Microscopy (PLM)**. All samples that were collected in this inspection were analyzed by PLM. However the PLM method has been recognized as being potentially inaccurate or unreliable at asbestos levels between 0-10%. If a PLM result is reported by the lab as >0% but less than 10%, the EPA recommends that the **Point Count (PC)** method be used to provide a more accurate and reliable result for that sample. The EPA considers a PLM result of >0% but <1% as "positive", unless PC is used to verify that the result is 1% or less. It is allowed that a PC result can replace a PLM result. Such replacement can be valuable when, for example, a PLM result of 2% can be replaced by a non-ACM PC result of 0.25%. The PC method has been recognized as being more accurate and reliable than the PLM method at asbestos levels between 0-3%. The PC analysis method was used in this survey for any samples that the lab determined were >0% asbestos, but <10% asbestos.

If a PC result is reported by the lab as >1% but less than 3%, the EPA allows for the more accurate **Gravimetric Transmission Electron Microscope (GTEM)** method be used to provide a more reliable result for that sample. It is permitted that a GTEM result can replace a PC result. Such replacement can be valuable when, for example, a PC result of 1.2% can be replaced by a non-ACM GTEM result of 0.5%.

All ACM that is not intact EPA Category I is required to be removed prior to building **demolition**, which can include limited demolition of any load-bearing structure. The EPA defines Category I ACM as roofing, resilient flooring (and associated mastics), gaskets, caulking, and packings. Intact Category I ACM is allowed by the EPA to remain in a building that is to be **demolished**.

The EPA requires a 10-day prior notification for: (a) whenever a building or a part of a building is to be **demolished** (i.e. load-bearing structures will be removed), or (b) whenever building **renovation** work necessitates that more than 160 square feet or 260 linear feet of **friable ACM** must be removed from the building. The Ohio Department of Health (ODH) requires a 10-day prior notification of **renovation** or **demolition** any time that more than 50 square feet or 50 linear feet of **friable ACM** must be removed from the building. **Friable ACM** is defined as asbestos material that can be crushed, crumbled, or reduced to powder by hand pressure when dry.

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

The following suspect asbestos-containing materials (ACM's) were found:

BUILDING 1

#	<u>SUSPECT ACM DESCRIPTION</u>	<u>SUSPECT ACM LOCATION (S)</u>
1	Pipe insulation (gray "aircell")	scattered locations throughout building
2	Pipe insulation (white "magblock")	scattered locations throughout building
3	Boiler exterior white block insulation	Boiler Room (basement level)
4	Boiler internal firebrick	Boiler Room (basement level)
5	Pipe insulation (cork w/black tar coating)	limited locations throughout the building
6	glazing/caulk on windows	interior side of windows on floors 1-4
7	transite panels	scattered locations throughout building
8	wallboard	scattered locations throughout building
9	joint compound (used on wallboard)	scattered locations throughout building
10	ceiling panels (2'x4' - several types)	scattered locations throughout building
11	ceiling tiles (1'x1' - several types)	scattered locations throughout building
12	brown mastic used on ceiling tiles	scattered locations throughout building
13	dark brown vinyl sheet flooring	2 nd floor central room
14	hard plaster walls	limited locations throughout the building
15	fabric flex connectors on ductwork	2 nd floor - northeast of freight elevator
16	floor tiles (9"x9" - several colors)	scattered locations throughout building
17	black mastic used on <u>most</u> floor tiles	scattered locations throughout building
18	yellow mastic under <u>some</u> floor tiles	scattered locations throughout building
19	firedoors (core material)	NE door into former restroom (may be more)
20	built-up roof material	flat roof
21	roof flashing	roof perimeter
22	tar paper wrap on water tank drain	roof - to east of elevator mechanical room
23	transite insulators	roof - elevator mechanical room

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

BUILDINGS 2 AND 6

#	<u>SUSPECT ACM DESCRIPTION</u>	<u>SUSPECT ACM LOCATION (S)</u>
1	Pipe insulation (gray "aircell")	scattered locations throughout buildings
2	Pipe insulation (white "magblock")	scattered locations throughout buildings
3	glazing/caulk on windows	interior side of windows
4	transite panels	scattered locations throughout building 2
5	soft concrete roof deck material	full roof deck in buildings 2 and 6
6	corrugated paper material	SW part of building 2
7	hard plaster walls	limited locations throughout the buildings
8	built-up roof material	roof, plus debris on floor of building 2
9	roof flashing	roof
10	roofing shingle	on floor - middle of building 2
11	roofing felt (rolls)	on floor - middle of building 2

BUILDINGS 4 AND 5

#	<u>SUSPECT ACM DESCRIPTION</u>	<u>SUSPECT ACM LOCATION (S)</u>
1	Pipe insulation (gray "aircell")	scattered locations throughout buildings
2	Pipe insulation (white "magblock")	scattered locations throughout buildings
3	glazing/caulk on windows	interior side of windows
4	transite panels (pieces)	scattered in large SE room of building 5
5	transite panels	west wall of SE portion of building 5
6	rope gasket material	NW wall of SE room in building 5
7	hard plaster walls	limited locations throughout the buildings
8	hard concrete roof deck material	full roof deck in building 5
9	wallboard	scattered locations throughout building
10	joint compound (used on wallboard)	scattered locations throughout building
11	Gilsulate 500 (in bags)	building 5 NW hall - south of building 4
12	ceiling tiles (1'x1' - 2 types)	building 4 - floors 2 and 3
13	brown mastic used on ceiling tiles	building 4 - floors 2 and 3
14	floor tiles (9"x9" - various colors)	building 5 west room & building 4 2 nd floor
15	black mastic used on most floor tiles	building 5 west room & building 4 2 nd floor
16	ceiling panels (2'x4' - one type)	stored in building 5 - west-central area
17	Boiler firebrick	Boiler Room in building 4 - 1 st floor
18	built-up roof material	roof of both buildings
19	roof flashing	roof of both buildings

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

Most of the assumed ACM's that are listed above were sampled, and the samples were analyzed at an accredited laboratory. These suspect ACM's that were sampled and analyzed for asbestos will be listed below in either the list of **Confirmed ACM's** or in the list of **Confirmed non-ACM's**. Some assumed ACM's were not sampled, and they will be listed below in the list of **Assumed ACM's**. These assumed ACM's were not sampled for one or more of the following reasons:

- 1) sampling was not necessary because these materials are intact EPA Category I ACM's that are considered to remain non-friable in the course of the upcoming renovation
- 2) the assumed ACM's were inaccessible or had extremely limited accessibility
- 3) building materials would have to be extensively demolished in order to access the assumed ACM for sampling
- 4) Owner determined that the material can remain an assumed ACM

The assumed ACM's will likely not need to be sampled in the future in conjunction with the planned building demolition. Non-friable (intact) EPA Category I ACM's (roofing, resilient flooring [and associated mastics], packings, caulks, and gaskets) are allowed by the EPA to remain in the building, and will not need to be sampled or abated prior to the demolition project.

It remains possible that some suspect ACM's may still exist in concealed wall or ceiling spaces. The building Owner (Harper Industries) and the demolition Contractor must use caution when opening up and exposing these concealed spaces during the building demolition process. This asbestos inspection is complete with respect to the accessible suspect ACM's in the building.

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

The following materials were sampled and shown to contain >1% asbestos (Confirmed ACM):

BUILDING 1

#	<u>CONFIRMED ACM DESCRIPTION</u>	<u>CONFIRMED ACM LOCATION(S)</u>	<u>PERCENT ASBESTOS</u>
1	Pipe insulation ("aircell" and "magblock")	scattered locations throughout building	25-95%
2	glazing/caulk on windows	interior side of windows on floors 1-4	0-1.5%
3	transite panels (pieces)	scattered locations throughout building	25%
4	Boiler exterior white block insulation	Boiler Room (basement level)	40%
5	joint compound (used on wallboard)	scattered locations throughout building	0-1.9%
6	fabric flex connectors on ductwork	2 nd floor - northeast of freight elevator	50%
7	floor tiles (9"x9" - several colors)	scattered locations throughout building	0-8%
8	firedoors (core material)	NE door into former restroom (may be more)	60%
9	roof flashing	roof perimeter	5%
10	transite insulators	roof - elevator mechanical room	30%

BUILDINGS 2 AND 6

#	<u>CONFIRMED ACM DESCRIPTION</u>	<u>CONFIRMED ACM LOCATION(S)</u>	<u>PERCENT ASBESTOS</u>
1	Pipe insulation ("aircell" and "magblock")	scattered locations throughout building	40%
2	glazing/caulk on windows	interior side of windows on floors 1-4	0-2.8%
3	transite panels (pieces)	scattered locations throughout building	20%

BUILDINGS 4 AND 5

#	<u>CONFIRMED ACM DESCRIPTION</u>	<u>CONFIRMED ACM LOCATION(S)</u>	<u>PERCENT ASBESTOS</u>
1	Pipe insulation ("aircell" and "magblock")	scattered locations throughout building	30-60%
2	glazing/caulk on windows	interior side of windows on floors 1-4	1.3-1.5%
3	transite panels (pieces)	scattered locations throughout building	25%
4	transite panels	west wall of SE portion of building 5	30%
5	rope gasket material	NW wall of SE room in building 5	50%
6	floor tiles (9"x9" - various colors)	building 5 west room & building 4 2 nd floor	0-6%
7	black mastic used on most floor tiles	building 5 west room & building 4 2 nd floor	3-4%
8	brown mastic used on ceiling tiles	building 4 - floors 2 and 3	0-1.3%

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

The following materials were sampled and shown to contain <1% asbestos (Confirmed Non-ACM):

BUILDING 1

#	CONFIRMED NON-ACM DESCRIPTION	CONFIRMED NON-ACM LOCATION(S)
1	Boiler internal firebrick	Boiler Room (basement level)
2	Pipe insulation (cork w/black tar coating)	limited locations throughout the building
3	wallboard	scattered locations throughout building
4	ceiling panels (2'x4' - several types)	scattered locations throughout building
5	ceiling tiles (1'x1' - several types)	scattered locations throughout building
6	dark brown vinyl sheet flooring	2 nd floor central room
7	hard plaster walls	limited locations throughout the building
8	yellow mastic under <i>some</i> floor tiles	scattered locations throughout building
9	tar paper wrap on water tank drain	roof - to east of elevator mechanical room

BUILDINGS 2 AND 6

#	CONFIRMED NON-ACM DESCRIPTION	CONFIRMED NON-ACM LOCATION(S)
1	soft concrete roof deck material	full roof deck in buildings 2 and 6
2	corrugated paper material	SW part of building 2
3	hard plaster walls	limited locations throughout the buildings
4	built-up roof material	roof, plus debris on floor of building 2
5	roofing shingle	on floor - middle of building 2
6	roofing felt (rolls)	on floor - middle of building 2

BUILDINGS 4 AND 5

#	CONFIRMED NON-ACM DESCRIPTION	CONFIRMED NON-ACM LOCATION(S)
1	hard plaster walls	limited locations throughout the buildings
2	hard concrete roof deck material	full roof deck in building 5
3	wallboard	scattered locations throughout the buildings
4	Gilsulate 500 (in bags)	building 5 NW hall - south of building 4
5	ceiling tiles (1'x1' - 2 types)	building 4 - floors 2 and 3
6	ceiling panels (2'x4' - one type)	stored in building 5 - west-central area
7	Boiler firebrick	Boiler Room in building 4 - 1 st floor

SECTION I - INSPECTION REPORT SUMMARY

VICTOREEN BUILDING, CLEVELAND, OHIO

The following materials remain Assumed ACM's:

BUILDING 1

#	<u>ASSUMED ACM DESCRIPTION</u>	<u>ASSUMED ACM LOCATION(S)</u>
1	Pipe insulation (cork w/black tar coating)	limited locations throughout the building
2	built-up roof material	flat roof
3	brown mastic used on ceiling tiles	scattered locations throughout building
4	black mastic used on <i>most</i> floor tiles	scattered locations throughout building

BUILDINGS 2 AND 6

#	<u>ASSUMED ACM DESCRIPTION</u>	<u>ASSUMED ACM LOCATION(S)</u>
1	firedoors (core material)	do destructive check during abatement
2	roof flashing	roof perimeter

BUILDINGS 4 AND 5

#	<u>ASSUMED ACM DESCRIPTION</u>	<u>ASSUMED ACM LOCATION(S)</u>
1	joint compound (used on wallboard)	scattered locations throughout building
2	firedoors (core material)	do destructive check during abatement
3	built-up roof material	flat roof
4	roof flashing	roof perimeter

SECTION II - ABATEMENT RECOMMENDATIONS AND COST ESTIMATES VICTOREEN BUILDING, CLEVELAND, OHIO

It has been determined that the following confirmed asbestos-containing materials (ACM's) exist in the building, and will need to be removed prior to the demolition project:

BUILDING 1

#	ACM DESCRIPTION	LOCATION(S)	APPROX. QUANTITY SF = sq. feet	ABATEMENT COST ESTIMATE
1	Pipe insulation ("aircell" and "magblock")	scattered locations throughout building	2,500 LF	\$18,700
2	glazing/caulk on windows	interior side of windows on floors 1-4	SEE ⁽¹⁾	\$2,500
3	transite panels (pieces)	scattered locations throughout building	SEE ⁽²⁾	\$3,000
4	Boiler exterior white block insulation	Boiler Room (basement level)	20 SF ⁽³⁾	\$1,000
5	joint compound (used on wallboard)	scattered locations throughout building	3,500 SF	\$5,500
6	fabric flex connectors on ductwork	2 nd floor - northeast of freight elevator	3	\$100
7	floor tiles (9"x9" - several colors) and mastic	scattered locations throughout building - mostly floors 2, 3 & 4	58,600 SF	\$70,000
8	firedoors (core material)	NE door into former restroom (may be more)	5	\$250
9	brown mastic used on clg. tiles	scattered locations throughout building	SEE ⁽⁵⁾	\$2,000
10	roof flashing	roof perimeter	700 SF	\$0 ⁽⁴⁾
11	transite insulators	roof - elevator mechanical room	3 SF	\$100
TOTAL EST. COST TO REMOVE ALL LISTED ACM'S IN BUILDING 1				\$ 103,150

⁽¹⁾ - glazing/caulk is not readily quantifiable; abatement will entail HEPA vacuuming of any dust or loose material; intact material can be left in place

⁽²⁾ - transite pieces are not readily quantifiable; abatement will entail searching for and finding all pieces, then dispose of properly

⁽³⁾ - firebricks and other debris will have to be moved to find all of this material, then dispose of properly

⁽⁴⁾ - this ACM is not friable and will not require abatement

⁽⁵⁾ - brown glue "pucks" are not readily quantifiable; abatement will entail removing all pieces & dispose of properly

SECTION II - ABATEMENT RECOMMENDATIONS AND COST ESTIMATES

VICTOREEN BUILDING, CLEVELAND, OHIO

It has been determined that the following confirmed/assumed asbestos-containing materials (ACM's) exist in the building, and will need to be removed prior to the demolition project:

BUILDINGS 2 AND 6

#	ACM DESCRIPTION	LOCATION(S)	APPROX. QUANTITY SF = sq. feet	ABATEMENT COST ESTIMATE
1	Pipe insulation ("aircell" and "magblock")	scattered locations throughout building	450 LF	\$3,500
2	glazing/caulk on windows	interior side of windows	SEE ⁽¹⁾	\$900
3	transite panels (pieces)	scattered locations throughout building	SEE ⁽²⁾	\$800
TOTAL EST. COST TO REMOVE ALL LISTED ACM'S IN BUILDINGS 2 & 6				\$ 5,200

⁽¹⁾ - glazing/caulk is not readily quantifiable; abatement will entail HEPA vacuuming of any dust or loose material; intact material can be left in place

⁽²⁾ - transite pieces are not readily quantifiable; abatement will entail searching for and finding all pieces, then dispose of properly

BUILDINGS 4 AND 5

#	ACM DESCRIPTION	LOCATION(S)	APPROX. QUANTITY SF = sq. feet	ABATEMENT COST ESTIMATE
1	Pipe insulation ("aircell" and "mag")	scattered locations throughout bldg.	1,050 LF	\$8,500
2	glazing/caulk on windows	interior side of windows	SEE ⁽¹⁾	\$900
3	transite panels (pieces)	scattered locations throughout SE part of the building	SEE ⁽²⁾	\$1,100
4	transite panels	west wall of SE portion of building 5	1,080 SF	\$2,400
5	rope gasket material	NW wall of SE room in building 5	1	\$50
6	floor tiles (9"x9" - various colors) and mastic	building 5 west room & building 4 2 nd floor	5,200 SF	\$7,000
7	brown mastic used on ceiling tiles	building 4 - floors 2 and 3	SEE ⁽³⁾	\$1,200
8	joint compound (used on wallboard)	scattered locations throughout bldg.	2,500 SF	\$4,500
TOTAL EST. COST TO REMOVE ALL LISTED ACM'S IN BUILDINGS 4 & 5				\$ 25,650

⁽¹⁾ - glazing/caulk is not readily quantifiable; abatement will entail HEPA vacuuming of any dust or loose material; intact material can be left in place

⁽²⁾ - transite pieces are not readily quantifiable; abatement will entail searching for and finding all pieces, then dispose of properly

⁽³⁾ - brown glue "pucks" are not readily quantifiable; abatement will entail removing all pieces & dispose of properly

ASBESTOS ABATEMENT REQUIREMENTS:

In accordance with the building demolition plans as they are understood to be at the time that this report was issued, the types and quantities of asbestos materials that are listed above will be required to be removed by an abatement contractor prior to the demolition of this building. The contractor will be required to file a 10-day prior notification with the Ohio Department of Health and the Ohio EPA.

The abatement contractor will also be required to:

- 1) search through areas and piles of junk and debris on the floors in scattered locations to find and dispose of pieces of ACM, including but not limited to pipe insulation, transite pieces, floor tiles, wallboard/joint compound, and window glazing.
- 2) check every black bag because some bags are filled with asbestos pipe insulation. Any such ACM must be found and disposed of properly.

The demolition plans include the recycling of the concrete, salvaging of the metals, and the salvaging of any other building materials that the Owner deems worthwhile. Due to that maximum salvage/recycling effort, all remnants and traces of the ACM's in the buildings must be removed in their entirety. No floor tiles or mastic can be left on the concrete floors. No ceiling tile glue can be left on the concrete ceilings. No asbestos remnants can be left on the pipes. All pieces and traces of wallboard must be abated.

The abatement plans for the ACM window glazing may have to be changed if the Owner wants to salvage the windows or the glass. If salvage is desired, then all window glazing must be removed from the windows, and that will increase the overall asbestos abatement cost by an estimated \$2,000-4,000.

ASBESTOS ABATEMENT COST ESTIMATE:

The asbestos abatement contractor cost estimate is **\$ 134,000**.

The cost estimate for an Environmental Consultant to prepare a simple written asbestos abatement Project Design and Specifications (required by ODH), monitor (part-time) the abatement work, conduct a final visual inspection, and provide a final written report to the Owner for the asbestos abatement is **\$2,500-4,500**, depending on which type and degree of services are requested by the Owner.

DISCLAIMER:

In drafting this Inspection Report, the Asbestos Hazard Evaluation Specialist (AHES) has attempted to inspect the areas of the building where asbestos may be located. In conducting such inspections, the AHES has relied on information provided by employees and/or agents of the building Owner. The AHES, therefore, disclaims any responsibility for failing to mention in the Inspection Report any area or areas which remain unknown to the AHES for any of the following reasons:

1. Inaccessible areas such as structural voids, pipe chases, and/or tunnel accesses which are nailed shut, covered over, or located under or behind heavy equipment (i.e. shop equipment, cabinets, etc.).
2. Sub flooring or other materials located under existing floor covering, including adhesives, mastics and additional layers of resilient flooring.
3. Any thermal system insulation which may be hidden under the outer accessible layers of insulation or impenetrable layers such as metal jackets.
4. Exterior material, structural materials and building materials not covered under the EPA AHERA regulation, but which may be regulated by the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP) in the event of demolition.
5. Areas hidden behind walls or above ceilings resulting from past remodeling or renovation.
6. Entire length of a tunnel or crawlspace that could not be accessed due to significant contamination, presence of water, complete or partial blockage, or insufficient room for personnel access.
7. Material above the ceiling not visually inspected due to ceiling construction such as interlocking metal square panels, inaccessible hard plaster ceilings, or excessive congestion of pipes, ducts, conduits, insulation, etc. within the ceiling space.
8. Inaccessible miscellaneous materials, which may be present within the building, such as interior or sealed boiler gaskets and fittings, interior components of ductwork and/or plenum work, kitchen exhaust hoods, etc.

The above list is not intended to be inclusive, but is representative of circumstances in which detection of possible areas of asbestos materials or asbestos contamination is beyond the control of the AHES and may not be detected through standard inspection practice.

SECTION III

INSPECTION DOCUMENTATION

- SITE DRAWING A**
- AERIAL PHOTOGRAPH**
- DRAWING - BUILDING 1 BASEMENT**
- DRAWING - BUILDING 1 FIRST FLOOR**
- DRAWING - BUILDING 1 2ND FLOOR**
- DRAWING - BUILDING 1 3RD FLOOR**
- DRAWING - BUILDING 1 4TH FLOOR**
- DRAWING - BUILDING 1 ROOF**
- DRAWING - BUILDINGS 2 AND 6**
- DRAWING - BUILDINGS 5 AND 4**
- FIELD SAMPLE LOGS**
- LAB REPORTS**
- INSPECTOR'S CERTIFICATION**



VICTOREEN BUILDING
10101 WOODLAND AVE., CLEVELAND, OHIO

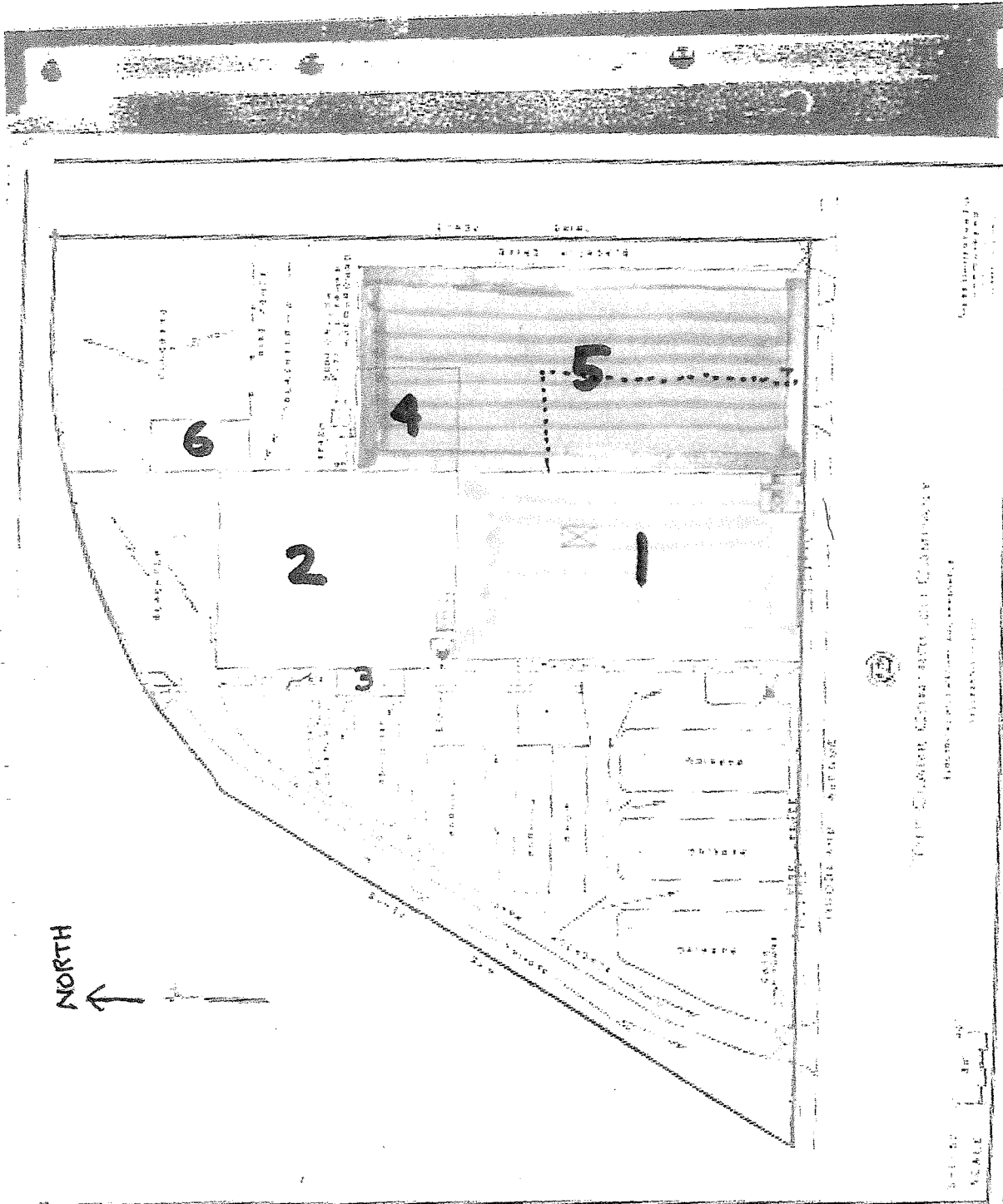
NORTH



AERIAL PHOTOGRAPH

SITE DRAWING A

VICTOREEN BUILDING
10101 WOODLAND AVE., CLEVELAND, OHIO

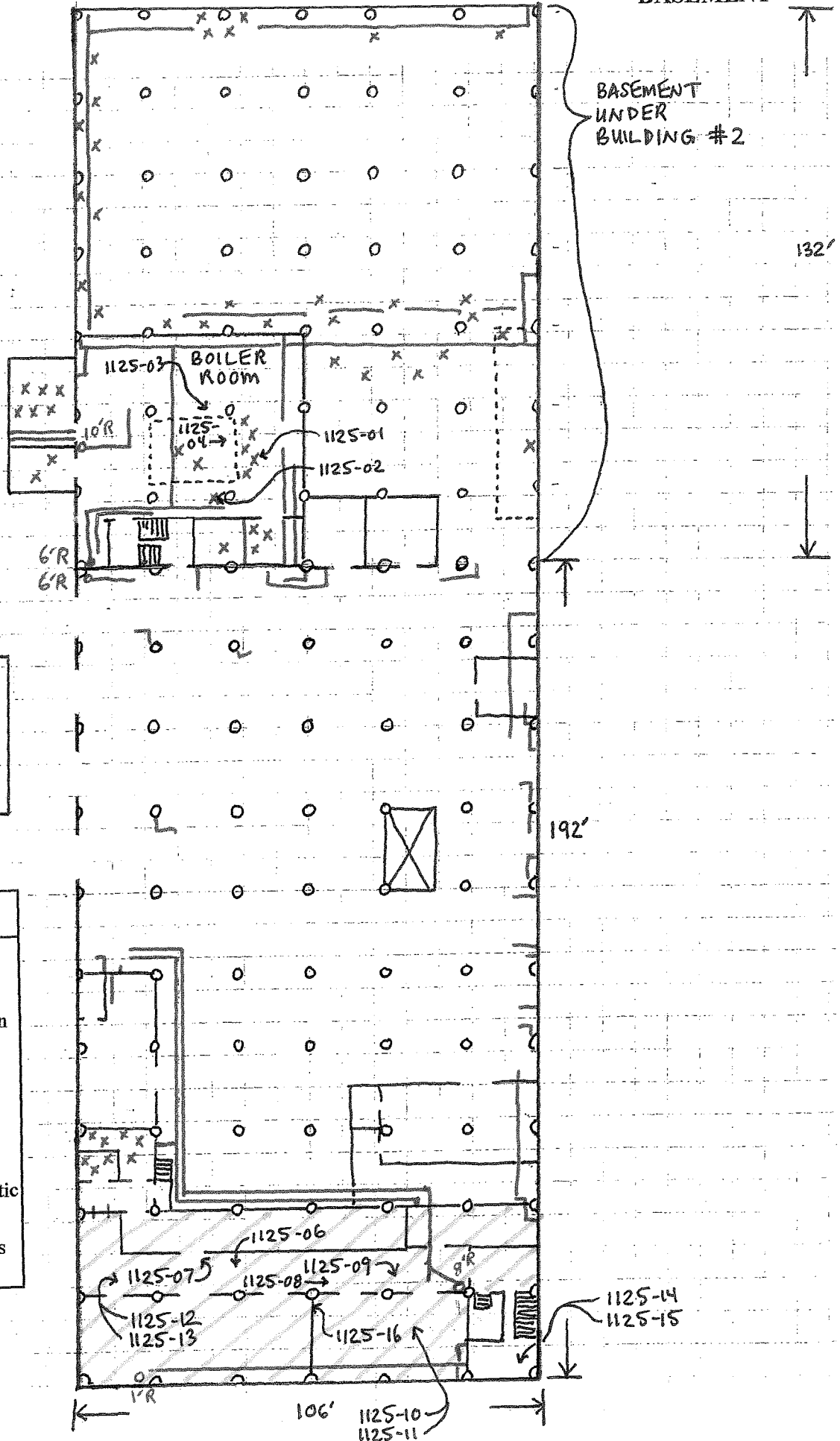


VICTORENE BUILDING
 10101 WOODLAND AVE.
 CLEVELAND, OHIO

ASBESTOS INSPECTION REPORT

BUILDING #1
 BASEMENT

NORTH



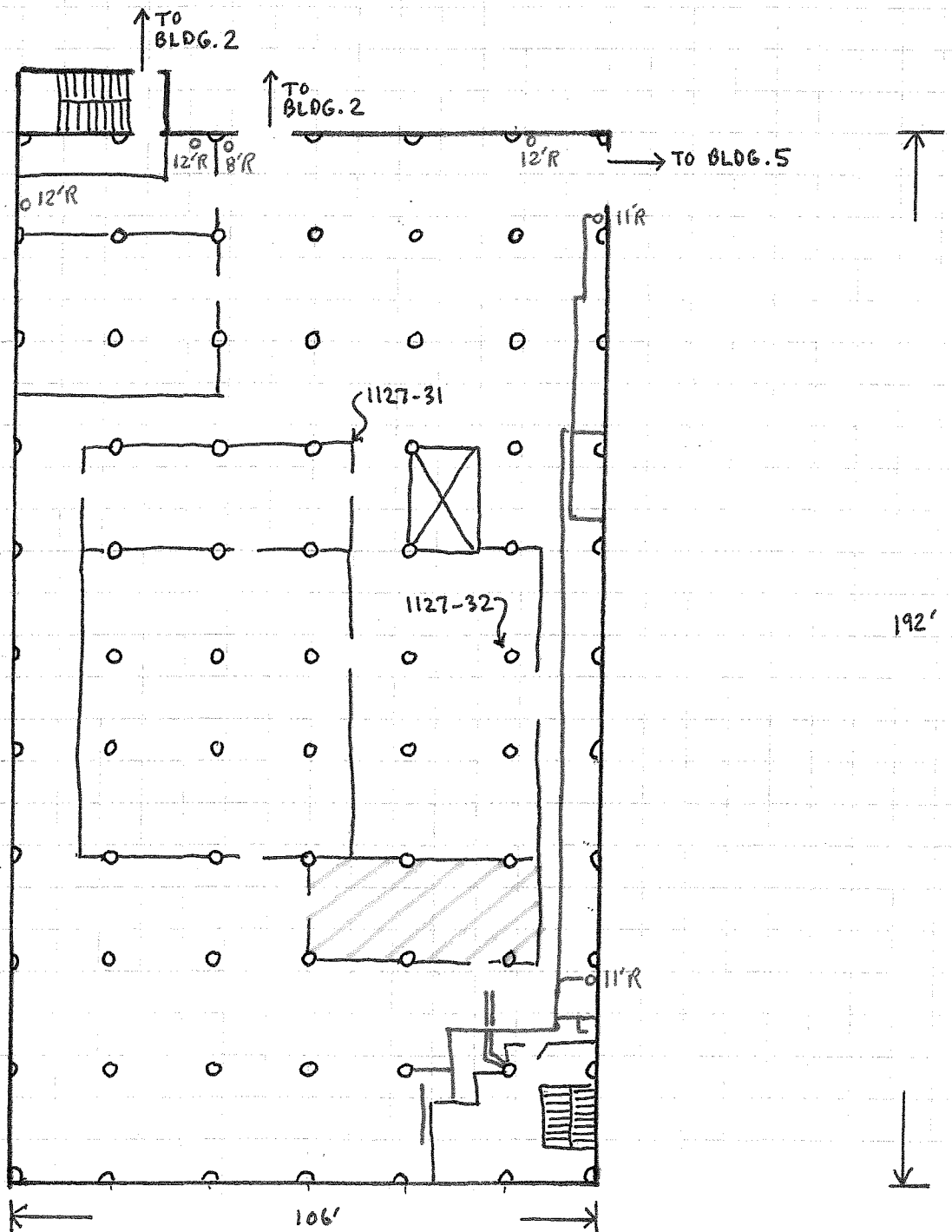
LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces

SCALE:
 1" = 34'
 1cm = 13'

NORTH



LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces








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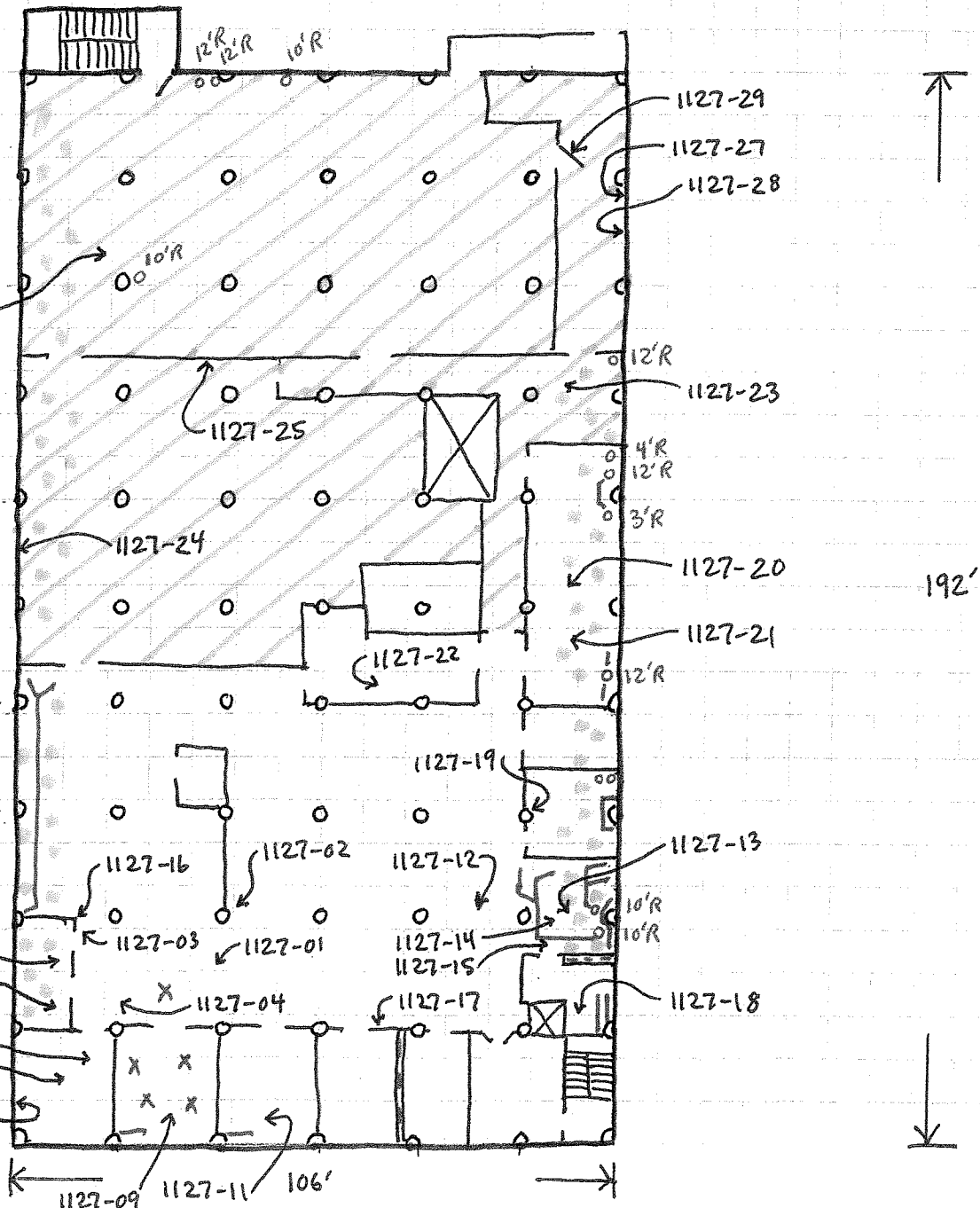
1" = 30'

1cm = 12'

NORTH
▲

LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	* ACM floor tile/mastic
	ACM transite pieces

* - more ACM floor tile and mastic are likely to exist under carpeting








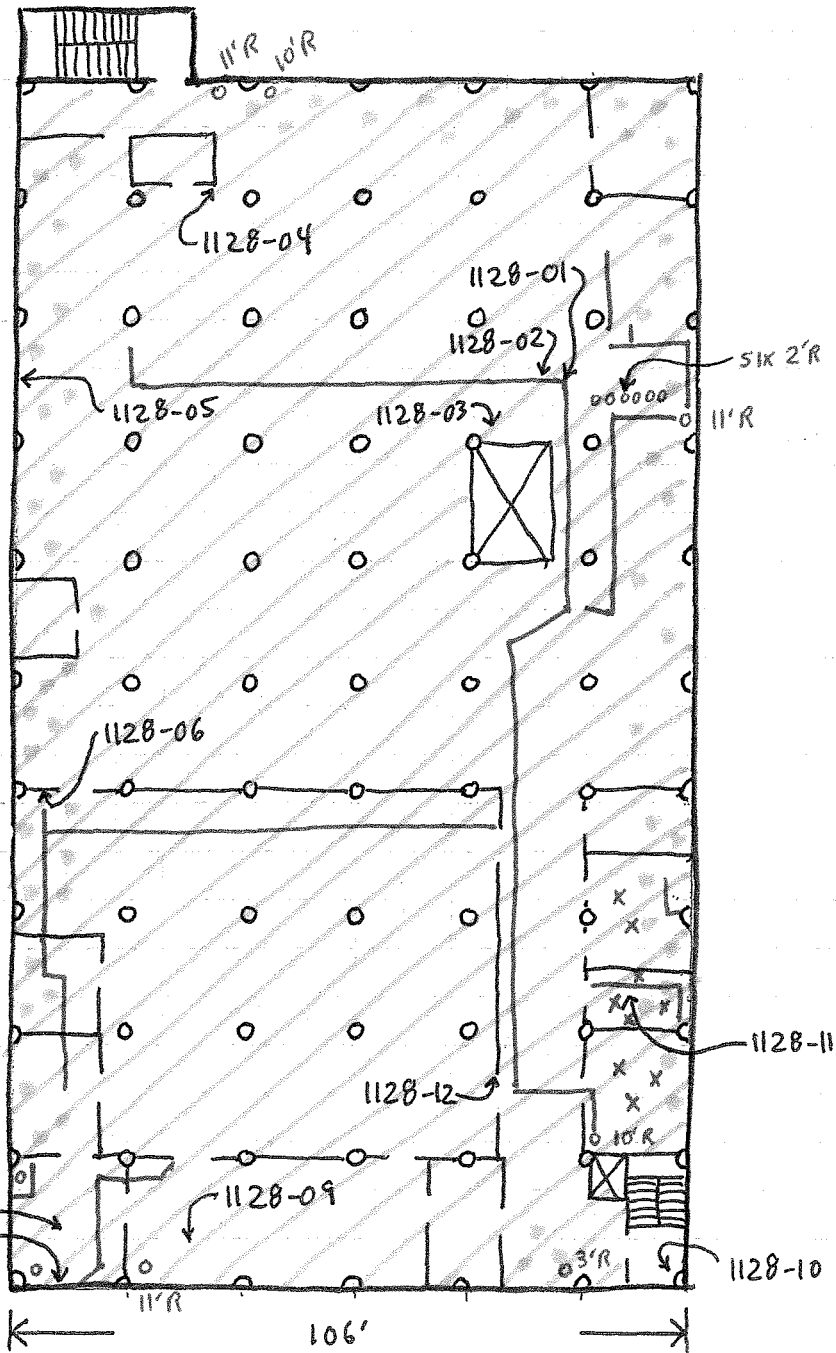
SCALE:

1" = 30'

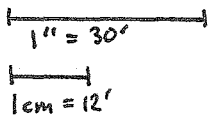
1 cm = 12'

NORTH
 ▲

LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces



SCALE:



192'



VICTORENE BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO

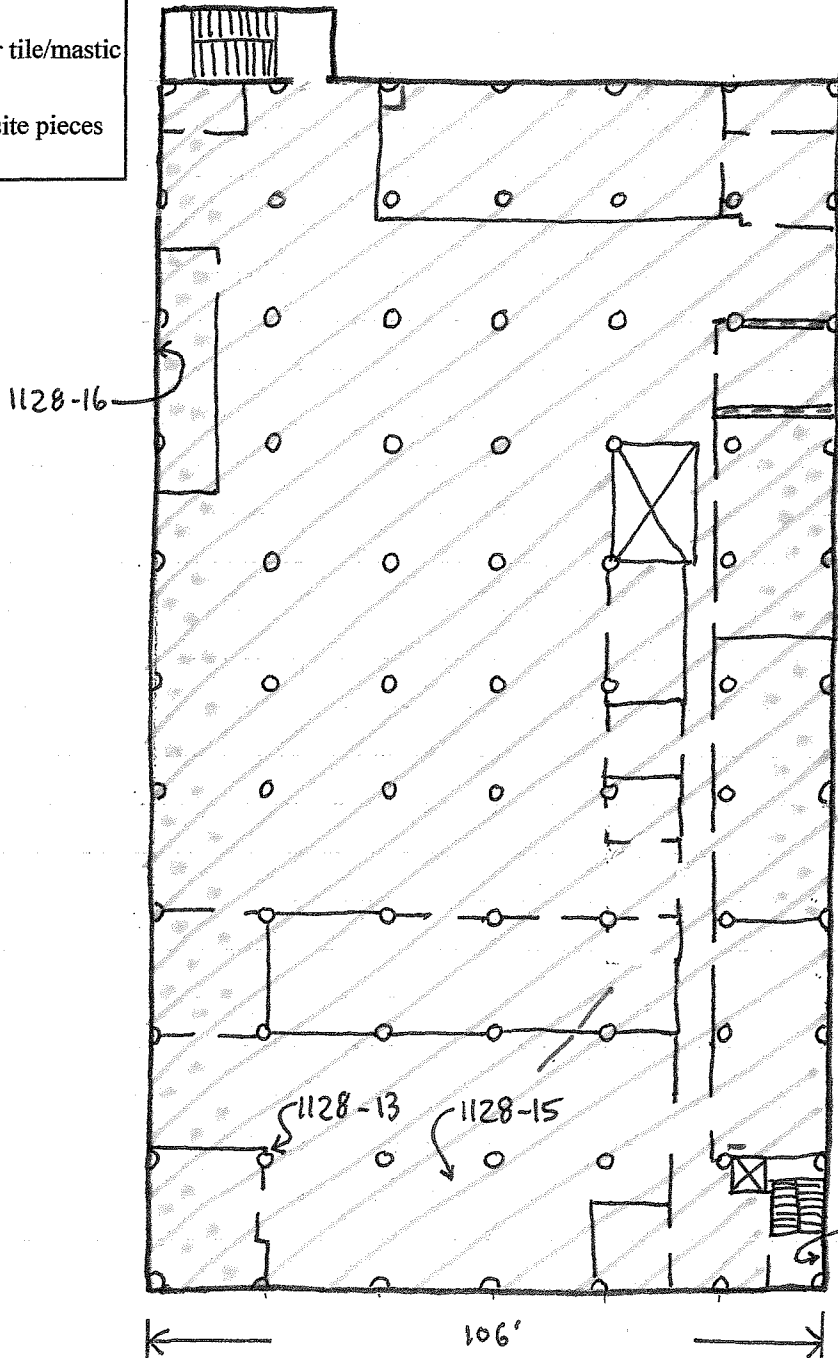
ASBESTOS INSPECTION REPORT

BUILDING #1
FOURTH FLOOR

NORTH



LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces



SCALE:

1" = 30'

1cm = 12'

106'

NORTH



LEGEND

1125-05 Sample # & location



ACM pipe insulation



ACM debris



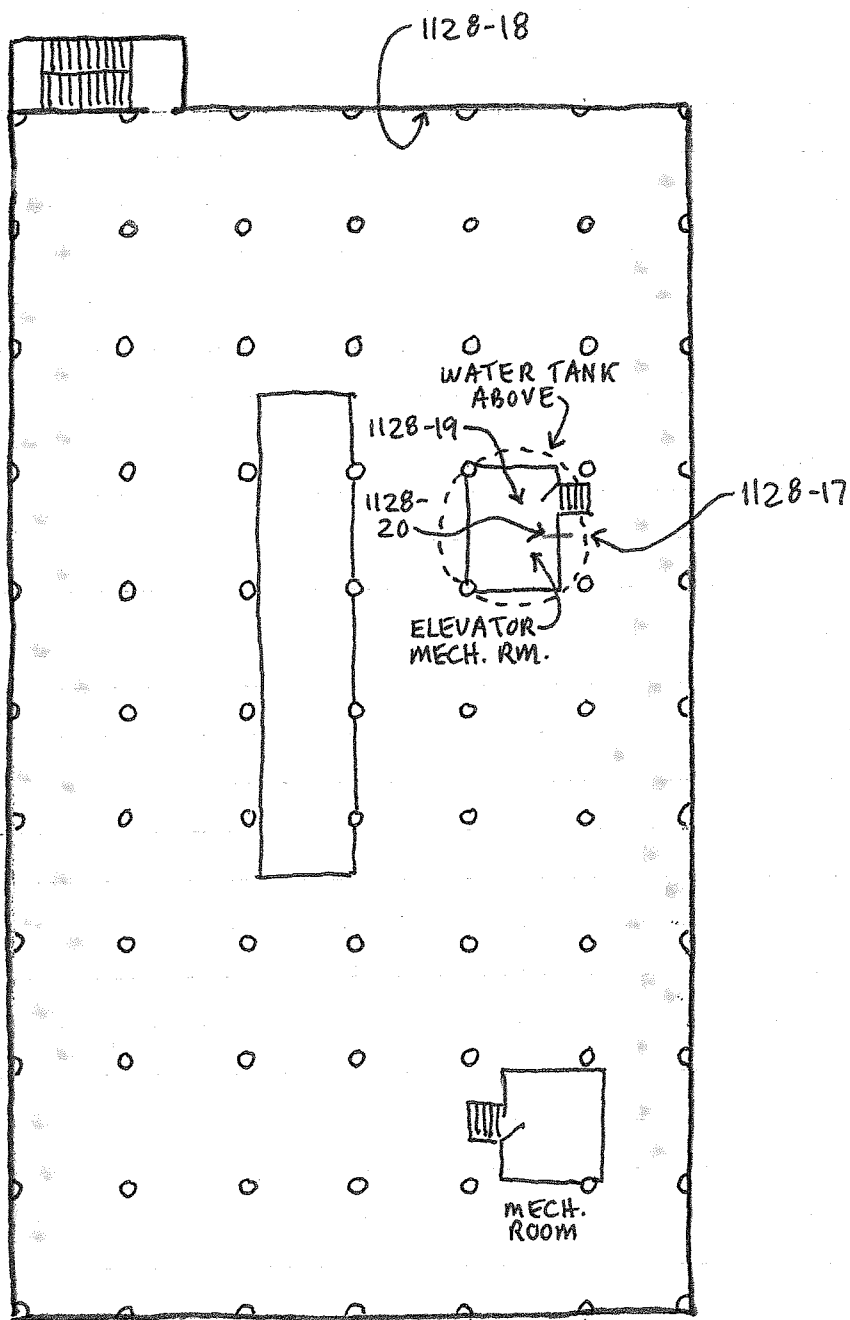
10' ACM pipe riser



ACM floor tile/mastic



ACM transite pieces



VICTORENE BUILDING
 10101 WOODLAND AVE.
 CLEVELAND, OHIO

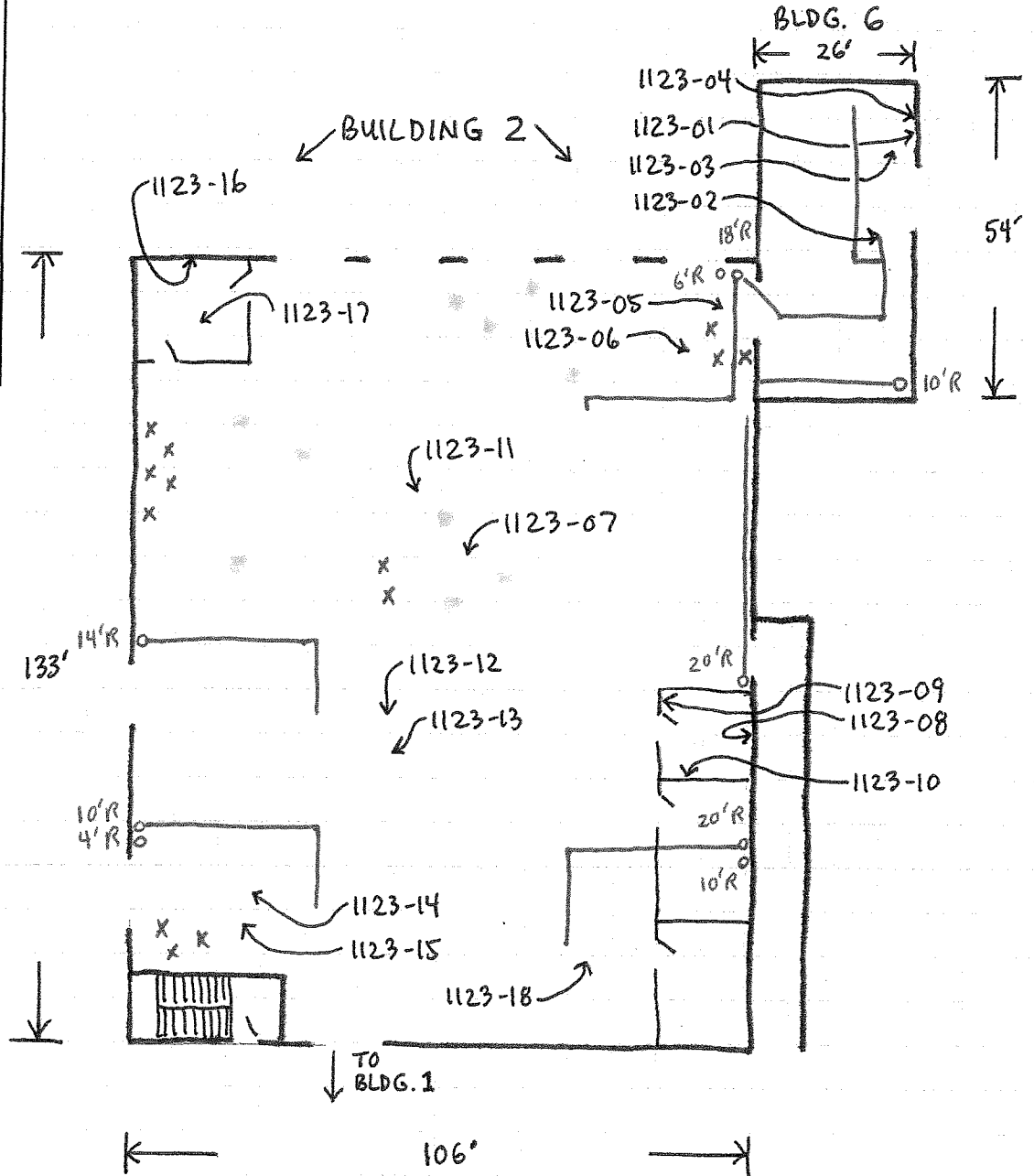
ASBESTOS INSPECTION REPORT

BUILDING #2
 AND
 BUILDING #6
 GROUND FLOOR

NORTH



LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces

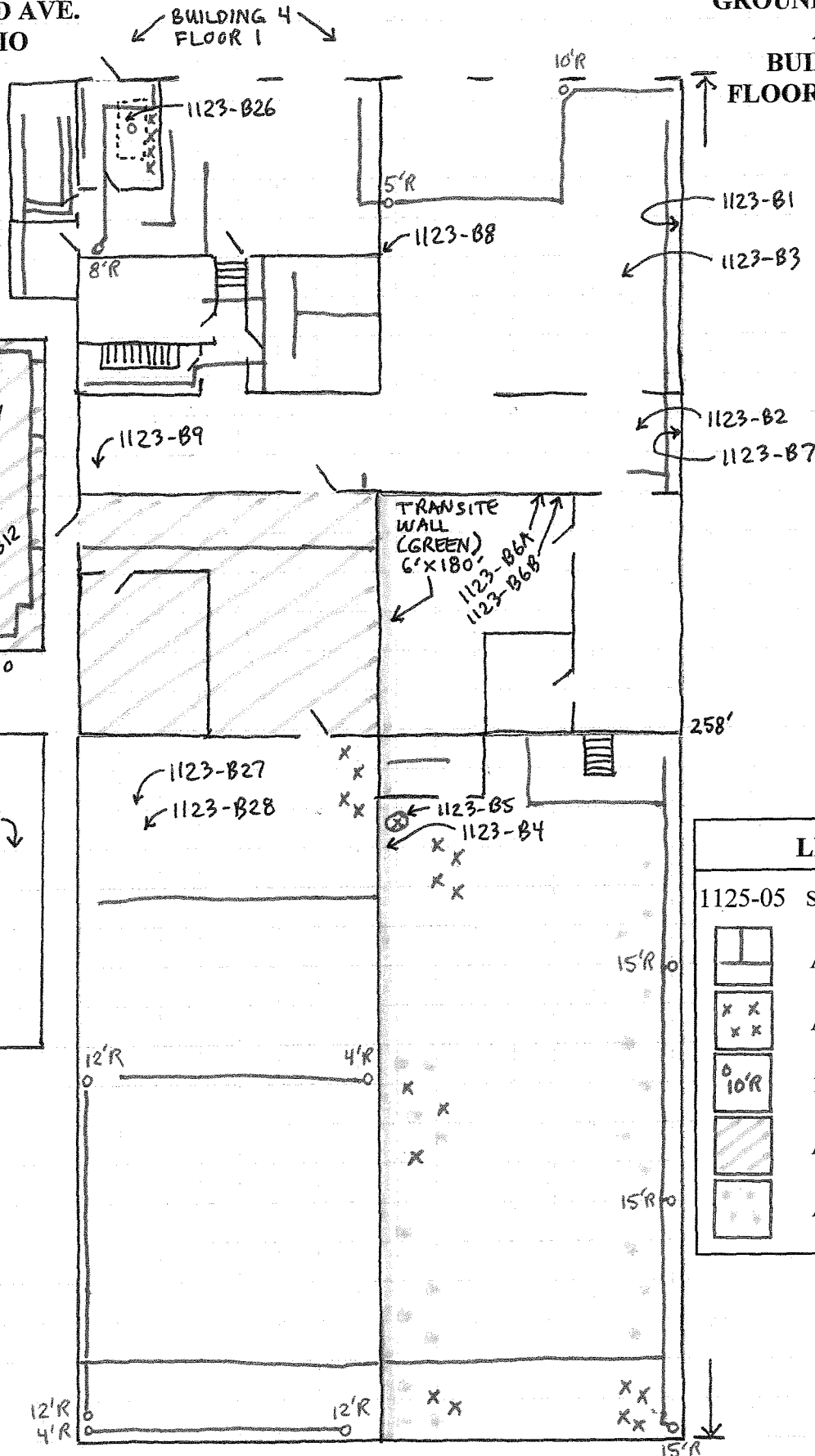
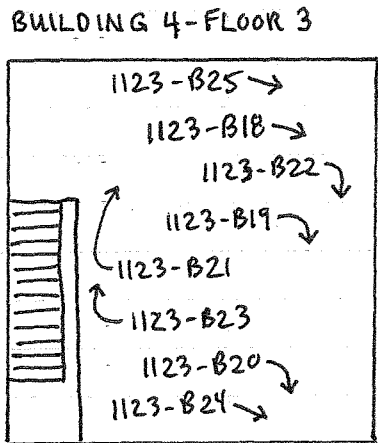
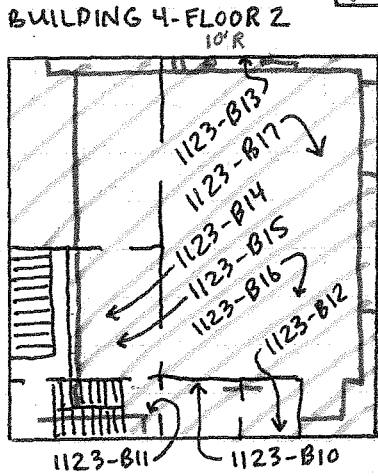


SCALE:
 1" = 30'

VICTORENE BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO

ASBESTOS INSPECTION REPORT

BUILDING #5
GROUND FLOOR
AND
BUILDING #4
FLOORS 1, 2 & 3



LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces

SCALE:
1" = 30'

114'
BUILDING 5

JP CONSULTING

Asbestos / Lead / IAQ Services

190 CORUNNA AVE.
FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com
Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis
Chain of Custody
Sample Log

REQUEST FOR LAB ANALYSIS - Page 1 of 2

SPECIAL INSTRUCTIONS: _____

PROJECT NAME VICTORENE BLDG. - Cleveland SAMPLE DATE 11-23-09 PROJECT NUMBER 2597
LAB NAME: IATL DATE REC'D BY LAB: 11-27-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH (X) 1-DAY () 2-DAY () 3-DAY () 5 DAY
(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
() FAX RESULTS TO: _____ AT () _____
() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-23-09	
RELINQUISHED TO:	1	FedEx	11-25-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: () ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1123-01	misc.	Bldg. 6 - roof deck	0
	-02	PI	"	40%
	-03	misc.	" - roof deck	0
	-04	caulk	" - window	0
	-05	misc.	Bldg. 2 - roof deck	0
	-06	"	" " "	0
	-07	"	" " "	0
	-08	caulk	" - window	1.7%
	-09	PL-W	"	0
	-10	PL-W	"	0
	-11	BR	" - debris on floor	0
	-12	misc.	" - roofing shingle	0

CODES:

AP - ACOUSTICAL PLASTER	CB - COVE BASE	FT - FLOOR TILE	PI - PIPE INSULATION	SP - SPRAYED FIREPROOFING
BO - BOILER INSULATION	CT - CEILING TILE 1'X1'	JC - JOINT COMPOUND	PL-C - PLASTER CEILING	TA - TANK INSULATION
BR - BUILT-UP ROOF	CP - CEILING PANEL 2'X4'	MA - MASTIC	PL-W - PLASTER WALL	VS - VINYL SHEET FLOOR
CMA - CARPET MASTIC	EF - ELBOW/FITTING	MISC - MISCELLANEOUS	RF - ROOF FLASHING	WB - WALLBOARD

JP CONSULTING

Asbestos / Lead / IAQ Services
 180 CORUNNA AVE.
 FAIRLAWN, OHIO 44138

Email: jprarat@hotmail.com
 Cell Phone: 318-328-7817

RCS FORM

Request for Lab Analysis
 Chain of Custody
 Sample Log

REQUEST FOR LAB ANALYSIS - Page 2 of 2

Special Instructions: _____

PROJECT NAME VICTORENE BLDG - Cleveland SAMPLE DATE 11-23-09 PROJECT NUMBER 2599

LAB NAME: IATL DATE REC'D BY LAB: 11-27-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH (X) 1-DAY () 2-DAY () 3-DAY () 5 DAY

(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () jprarat@karlrohrer.com

() FAX RESULTS TO: _____ AT () _____

() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
 BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
 OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-23-09	
RELINQUISHED TO:		FEDERAL EXPRESS	11-25-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1123-13	misc.	Bldg. 2 - roll of roofing felt	0
	-14	misc.	" - roof deck debris	0
	-15	BR	" - floor debris	0
	-16	caulk	" - window caulk	2.8%
	-17	misc.	" - transite panel (on styrofoam)	20%
	-18	misc.	" - corrugated paper floor debris	0

ACM CODES:

- | | | | | |
|--------------------------|------------------------|----------------------|------------------------|---------------------------|
| AP - ACOUST. PLASTER | CT - CEILING TILE 1X1 | FT - FLOOR TILE | PI - PIPE INSULATION | SP - SPRAY-ON FIREPRFG. |
| BO - BOILER INSULATION | CP - CEILING PANEL 2X4 | JC - JOINT COMPOUND | PL-C - PLASTER CEILING | TA - TANK INSULATION |
| BR - BUILT-UP ROOF MAT'L | EF - ELBOW/FITTING | MA - MASTIC (GLUE) | PL-W - PLASTER WALL | VS - VINYL SHEET FLOORING |
| | | MISC - MISCELLANEOUS | RF - ROOF FLASHING | WB - WALLBOARD |

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corumna Ave. Fairlawn OH 44333	Report Date: 11/30/2009 Project: Victorene Bldg. - Cleveland Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3801852	Description / Location:	White Cementitious Bldg. 6 - Roof Deck
Client No.:	1123-01		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
			<u>% Non-Fibrous Material</u> 100

Lab No.:	3801853	Description / Location:	Grey Insulation Bldg. 6
Client No.:	1123-02		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
40	Chrysotile	30	Cellulose
			<u>% Non-Fibrous Material</u> 30

Lab No.:	3801854	Description / Location:	White Cementitious Bldg. 6 - Roof Deck
Client No.:	1123-03		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
			<u>% Non-Fibrous Material</u> 100

Lab No.:	3801855	Description / Location:	Off-White Glazing Bldg. 6
Client No.:	1123-04		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			<u>% Non-Fibrous Material</u> 100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

*This confidential report relates only to those item(s) tested and does not represent an endorsement by NIST-NVLAP, AIHA or any agency of the U.S. government
This report shall not be reproduced except in full, without written approval of the laboratory.*

Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: V. Smith

Approved By: _____

Date: 11/30/2009

Frank E. Ehrenfeld, III
Laboratory Director

CERTIFICATE OF ANALYSIS

Client: JP Consulting	Report Date: 11/30/2009
190 Corunna Ave.	Project: Victorene Bldg. - Cleveland
Fairlawn OH 44333	Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801856	Description / Location: White Cementitious			
Client No.: 1123-05	Bldg. 2 - Roof Deck			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	Trace	Cellulose	100

Lab No.: 3801857	Description / Location: White Cementitious			
Client No.: 1123-06	Bldg. 2 - Roof Deck			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	Trace	Cellulose	100

Lab No.: 3801858	Description / Location: White Cementitious			
Client No.: 1123-07	Bldg. 2 - Roof Deck			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	Trace	Cellulose	100

Lab No.: 3801859	Description / Location: Grey Glazing			
Client No.: 1123-08	Bldg. 2			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.7	Chrysotile	None Detected	None Detected	PC 98.3

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: V. Smith

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 11/30/2009
Project: Victorenc Bldg. - Cleveland
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801860	Description / Location: White Plaster			
Client No.: 1123-09	Bldg. 2 - Roof Deck			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3801861	Description / Location: White Plaster			
Client No.: 1123-10	Bldg. 2 - Roof Deck			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3801862	Description / Location: Black Tar			
Client No.: 1123-11	Bldg. 2 - Debris On Floor			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	15	Mineral Wool	85

Lab No.: 3801863	Description / Location: Brown/Black Shingle			
Client No.: 1123-12	Bldg. 2 - Roofing			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	10	Mineral Wool	90

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

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Analysis Performed By: V. Smith

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 11/30/2009 Project: Victorene Bldg. - Cleveland Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801864	Description / Location: Black Paper		
Client No.: 1123-13	Bldg. 2 - Roll Of Roofing Felt		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	65	Cellulose
			<u>% Non-Fibrous Material</u>
			35

Lab No.: 3801865	Description / Location: White Cementitious		
Client No.: 1123-14	Bldg. 2 - Roof Deck Debris		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
			<u>% Non-Fibrous Material</u>
			100

Lab No.: 3801866	Description / Location: Black Tar/Paper		
Client No.: 1123-15	Bldg. 2 - Floor Debris		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Cellulose
			<u>% Non-Fibrous Material</u>
			40

Lab No.: 3801867	Description / Location: Grey Glazing		
Client No.: 1123-16	Bldg. 2 - Window Caulk		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 2.8	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			PC 97.2

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: V. Smith

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 11/30/2009
Project: Victorane Bldg. - Cleveland
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801868 **Description / Location:** Grey Transite
Client No.: 1123-17 Bldg. 2 - Panel (On Styrofoam)

<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
20	Chrysotile	None Detected	None Detected	80

Lab No.: 3801869 **Description / Location:** Tar Paper
Client No.: 1123-18 Bldg. 2 - Corrugated Paper Floor Debris

<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	98	Cellulose	2

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: V. Smith

Date: 11/30/2009

JP CONSULTING

Asbestos / Lead / IAQ Services

190 CORUNNA AVE.

FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com

Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis

Chain of Custody

Sample Log

REQUEST FOR LAB ANALYSIS - Page 1 of 3

Special Instructions: _____

PROJECT NAME Harper Industries-Victoreen Bldg., Cleveland SAMPLE DATE 11-23-09 PROJECT NUMBER 2597

LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY

(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () jprarat@karlrohrer.com

() FAX RESULTS TO: _____ AT () _____

() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count

BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)

OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<u>James Prarat</u>	JP CONSULTING	<u>11-23-09</u>	
RELINQUISHED TO:	_____	FEDERAL EXPRESS	<u>11-30-09</u>	
RELINQUISHED TO:		<u>IATL</u>		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: <input checked="" type="checkbox"/> ACM CODE <input type="checkbox"/> AIR VOL	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	<u>1123-B1</u>	<u>caulk</u>	<u>Bldg. 5 - NE window</u>	<u>1.4%</u>
	<u>-B2</u>	<u>misc.</u>	<u>" - roof deck</u>	<u>0</u>
	<u>-B3</u>	<u>misc.</u>	<u>" - roof deck</u>	<u>0</u>
	<u>-B4</u>	<u>misc.</u>	<u>" - suspect transite panels (wall)</u>	<u>30%</u>
	<u>-B5</u>	<u>misc.</u>	<u>" - gasket (rope)</u>	<u>50%</u>
	<u>-B6A</u>	<u>JC</u>	<u>" - joint compound</u>	<u>0</u>
	<u>-B7</u>	<u>caulk</u>	<u>" - east window</u>	<u>1.3%</u>
	<u>-B8</u>	<u>WB</u>	<u>" - N central wall</u>	<u>0</u>
	<u>-B9</u>	<u>misc.</u>	<u>" - Gilsulate 500 (in bags)</u>	<u>0</u>
	<u>-B10</u>	<u>PL-W</u>	<u>BLDG. 4 - restroom</u>	<u>0</u>
	<u>-B11</u>	<u>FT/MA</u>	<u>" - stairwell (fan)</u>	<u>0</u> <u>TILE</u> <u>MA</u> <u>3.2%</u>
	<u>-B12</u>	<u>PL-W</u>	<u>" - restroom</u>	<u>0</u>

ACM CODES:

AP - ACOUST. PLASTER
BO - BOILER INSULATION
BR - BUILT-UP ROOF MAT'L

CT - CEILING TILE 1X1
CP - CEILING PANEL 2X4
EF - ELBOW/FITTING

FT - FLOOR TILE
JC - JOINT COMPOUND
MA - MASTIC (GLUE)
MISC - MISCELLANEOUS

PI - PIPE INSULATION
PL-C - PLASTER CEILING
PL-W - PLASTER WALL
RF - ROOF FLASHING

SP - SPRAY-ON FIREPRFG.
TA - TANK INSULATION
VS - VINYL SHEET FLOORING
WB - WALLBOARD

RCS FORM

Request for Lab Analysis
 Chain of Custody
 Sample Log

REQUEST FOR LAB ANALYSIS - Page 2 of 3

Special Instructions: _____

PROJECT NAME VICTOREEN BLDG. SAMPLE DATE 11-23-09 PROJECT NUMBER 2597

LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY

(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () jprarat@karlrohler.com

() FAX RESULTS TO: _____ AT () _____

() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count

BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)

OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-23-09	
RELINQUISHED TO:	_____	FEDERAL EXPRESS	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: <input checked="" type="checkbox"/> ACM CODE <input type="checkbox"/> AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1123-B13	caulk	Bldg. 4 - window caulk	1.5%
	-B14	misc.	" - clg. board	0
	-B15	CT1	" - 2nd floor	0
	-B16	FT/MA	" - " " (green) TILE BLK MA	6% 3%
	-B17	misc.	" - glue (on CT1)	0
	-B18	CT2	" - 3rd floor	0
	-B19	CT2	" " "	0
	-B20	CT2	" " "	0
	-B21	WB	" " "	0
	-B22	WB	" " "	0
	-B23	JC	" " "	0
	-B24	misc.	" " " (glue on CT2)	1.3%

ACM CODES:

- | | | | | |
|--------------------------|------------------------|----------------------|------------------------|---------------------------|
| AP - ACOUST. PLASTER | CT - CEILING TILE 1X1 | FT - FLOOR TILE | PI - PIPE INSULATION | SP - SPRAY-ON FIREPRFG. |
| BO - BOILER INSULATION | CP - CEILING PANEL 2X4 | JC - JOINT COMPOUND | PL-C - PLASTER CEILING | TA - TANK INSULATION |
| BR - BUILT-UP ROOF MAT'L | EF - ELBOW/FITTING | MA - MASTIC (GLUE) | PL-W - PLASTER WALL | VS - VINYL SHEET FLOORING |
| | | MISC - MISCELLANEOUS | RF - ROOF FLASHING | WB - WALLBOARD |

JP CONSULTING

1000 N. 10th St. Suite 100
 Phoenix, AZ 85006
 Phone: 330-328-7817

www.jpconsulting.com

Email: jjprarat@hotmail.com

Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis

Chain of Custody

Sample Log

REQUEST FOR LAB ANALYSIS - Page 3 of 3

Special Instructions: _____

PROJECT NAME VICTOREEN BLDG. SAMPLE DATE 11-23-09 PROJECT NUMBER 2597

LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: RUSH 1-DAY 2-DAY 3-DAY 5 DAY

EMAIL RESULTS TO: jjprarat@hotmail.com jjprarat@karlrohrer.com

FAX RESULTS TO: _____ AT _____

PHONE RESULTS TO: _____ AT 330-328-7817 _____

ANALYSIS REQUESTED:

AIR: PCM (NIOSH 7400) TEM-AHERA OSHA (ID-160) Fungal Spore Count

BULK: PLM (EPA/600/R-93/116) Gravimetric-PLM (ELAP 198.1) Point Count Gravimetric-TEM (ELAP 198.4)

OTHER: Lead Mold Bulk Mold Swab or Tape See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	<i>11-23-09</i>	
RELINQUISHED TO:	_____	FEDERAL EXPRESS	<i>11-30-09</i>	
RELINQUISHED TO:		<i>IATL</i>		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: <input checked="" type="checkbox"/> ACM CODE <input type="checkbox"/> AIR VOL.	SAMPLE ID / LOCATION	RESULT <i>0%</i> ASBESTOS
	<i>1123-B25</i>	<i>MA</i>	<i>Bldg. 4 - 3rd Flr. (black MA on floor)</i>	<i>4%</i>
	<i>-B26</i>	<i>misc.</i>	<i>" - 1st Flr. - boiler firebrick</i>	<i>0</i>
	<i>-B27</i>	<i>CPI</i>	<i>Bldg. 5 - 2x2 cly. panels stacked</i>	<i>0</i>
	<i>-B28</i>	<i>CPI</i>	<i>" - " " " "</i>	<i>0</i>
	<i>-B6B</i>	<i>WB</i>	<i>Bldg. 5</i>	<i>0</i>

ACM CODES:

AP - ACOUST. PLASTER
 BO - BOILER INSULATION
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CT - CEILING TILE 1X1
 CP - CEILING PANEL 2X4
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 PL-C - PLASTER CEILING
 PL-W - PLASTER WALL
 RF - ROOF FLASHING

SP - SPRAY-ON FIREPRFG.
 TA - TANK INSULATION
 VS - VINYL SHEET FLOORING
 WB - WALLBOARD

CERTIFICATE OF ANALYSIS

Client: IP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 12/2/2009
Project: Harper Industries-Victorecn Bldg.
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803650	Description / Location:	Off-White Glazing Bldg. 5	
Client No.:	1123-B1			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1,4	Chrysotile	None Detected	None Detected	PC 98.6

Lab No.:	3803651	Description / Location:	Grey Cementitious Bldg. 5-Roof Deck	
Client No.:	1123-B2			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803652	Description / Location:	Grey Cementitious Bldg. 5-Roof Deck	
Client No.:	1123-B3			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803653	Description / Location:	Grey Transite Bldg. 5	
Client No.:	1123-B4			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
30	Chrysotile	None Detected	None Detected	70

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Approved By: _____

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Harper Industries-Victoreen Bldg.
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803654	Description / Location:	White Woven Fibers Bldg. 5	
Client No.:	1123-B5			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
50	Chrysotile	30	Synthetic	20

Lab No.:	3803655	Description / Location:	White Joint Compound Bldg. 5	
Client No.:	1123-B6			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803656	Description / Location:	Lt. Tan Glazing Bldg. 5	
Client No.:	1123-B7			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.3	Chrysotile	None Detected	None Detected	PC 98.7

Lab No.:	3803657	Description / Location:	Off-White Sheetrock Bldg. 5	
Client No.:	1123-B8			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	3	Fibrous Glass	95
		2	Cellulose	

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/2/2009 Project: Harper Industries-Victorcen Bldg. Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803658	Description / Location: White Gilsulate		
Client No.: 1123-B9	Bldg. 5		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

Lab No.: 3803659	Description / Location: Grey Plaster		
Client No.: 1123-B10	Bldg. 4-Restroom		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

Lab No.: 3803660	Description / Location: Tan/Black Floor Tile		
Client No.: 1123-B11	Bldg. 4-Stairwell		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

Lab No.: 3803660	Description / Location: Brown Mastic		Layer No.: 2
Client No.: 1123-B11	Bldg. 4-Stairwell		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 3.2	Chrysotile	None Detected	None Detected
			PC 96.8

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting	Report Date:	12/2/2009
	190 Corunna Ave.	Project:	Harper Industries-Victoreen Bldg.
	Fairlawn OH 44333	Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803661	Description / Location:	White/Grey Plaster		
Client No.:	1123-B12		Bldg. 4-Restroom		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
None Detected	None Detected	Trace	Hair	100	

Lab No.:	3803662	Description / Location:	Grey Glazing		
Client No.:	1123-B13		Bldg. 4-Window		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
PC 1.5	Chrysotile	None Detected	None Detected	PC 98.5	

Lab No.:	3803663	Description / Location:	Off-White/Tan Sheetrock		
Client No.:	1123-B14		Bldg. 4-Clg. Board		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
None Detected	None Detected	10	Cellulose	90	

Lab No.:	3803664	Description / Location:	White/Brown Ceiling Tile		
Client No.:	1123-B15		Bldg. 4-2nd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
None Detected	None Detected	90	Cellulose	10	

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solcibello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: IP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/2/2009 Project: Harper Industries-Victoreen Bldg. Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803665	Description / Location: Green Floor Tile		
Client No.: 1123-B16	Bldg. 4-2nd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 5.8	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			PC 94.2

Lab No.: 3803665	Description / Location: Black Mastic		Layer No.: 2
Client No.: 1123-B16	Bldg. 4-2nd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 3.3	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			PC 96.7

Lab No.: 3803666	Description / Location: Black Mastic A/W CT1		
Client No.: 1123-B17	Bldg. 4		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			100

Lab No.: 3803667	Description / Location: Off-White Ceiling Tile		
Client No.: 1123-B18	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u>
			40

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/2/2009 Project: Harper Industries-Victoreen Bldg. Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803668	Description / Location: Off-White Ceiling Tile		
Client No.: 1123-B19	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u>
			40

Lab No.: 3803669	Description / Location: Off-White Ceiling Tile		
Client No.: 1123-B20	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u>
			40

Lab No.: 3803670	Description / Location: White/Tan Sheetrock		
Client No.: 1123-B21	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	12	Cellulose
			<u>% Non-Fibrous Material</u>
			88

Lab No.: 3803671	Description / Location: White/Tan Sheetrock		
Client No.: 1123-B22	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	12	Cellulose
			<u>% Non-Fibrous Material</u>
			88

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Cornhua Ave.
Fairlawn OH 44333

Report Date: 12/2/2009
Project: Harper Industries-Victoreen Bldg.
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803672	Description / Location: White/Tan Sheetrock		
Client No.: 1123-B23	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	20	Cellulose
			<u>% Non-Fibrous Material</u>
			80

Lab No.: 3803673	Description / Location: Brown Mastic A/W Ceiling Tile 2		
Client No.: 1123-B24	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 1.3	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			PC 98.7

Lab No.: 3803674	Description / Location: Black Mastic		
Client No.: 1123-B25	Bldg. 4-3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 4.2	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			PC 95.8

Lab No.: 3803675	Description / Location: Off-White Brick		
Client No.: 1123-B26	Bldg. 4-1st Floor - Boiler Firebrick		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			<u>% Non-Fibrous Material</u>
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Coruuna Ave.
Fairlawn OH 44333

Report Date: 12/2/2009
Project: Harper Industries-Victoreen Bldg.
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803676 Description / Location: Tan Ceiling Tile; 2x2
Client No.: 1123-B27 Bldg. 5-Clg. Panels

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	35	Cellulose	30
		35	Fibrous Glass	

Lab No.: 3803677 Description / Location: Tan Ceiling Tile; 2x2
Client No.: 1123-B28 Bldg. 5-Clg. Panels

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	35	Cellulose	30
		35	Fibrous Glass	

Lab No.: 3803678 Description / Location: White/Tan Sheetrock
Client No.: 1123-B6B

% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	12	Cellulose	38

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

RCS FORM
 Request for Lab Analysis
 Chain of Custody
 Sample Log

REQUEST FOR LAB ANALYSIS - Page 1 of 2

Special Instructions: _____

PROJECT NAME: VICTORENE BLDG. - Cleveland SAMPLE DATE: 11-25-09 PROJECT NUMBER: 2597
 LAB NAME: IATL DATE REC'D BY LAB: 11-27-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH (X) 1-DAY () 2-DAY () 3-DAY () 5 DAY
 (X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () jprarat@karlrohrer.com
 () FAX RESULTS TO: _____ AT () _____
 () PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
 BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
 OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-25-09	
RELINQUISHED TO:	_____	FEDERAL EXPRESS	11-25-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1125-01	BO	Bldg. 1 - Boiler Rm. - jacket insul.	40%
	-02	PI	" " " "	95%
	-03	misc.	" " " " fire brick	0
	-04	misc.	" " " " boiler int. liner	0
	-05	CP	" - Basement E. room	0
	-06	FT	" - " S. end (9x9 tan)	1.3%
	-07	FT	" - " " (12x12 tan) YEL TILE MA	0
	-08	CT	" - " " (12x12 ph + sm. gashes)	0
	-09	CT	" - " " (" ")	0
	-10	CP	" " " " (2x4 den ph + s-m.t.f.)	0
	-11	CT	" " " " (12x12 ph + sm. gash tan)	0
	-12	JC	" " " " "	1.3%

ACM CODES:

- | | | | | |
|--------------------------|------------------------|----------------------|------------------------|---------------------------|
| AP - ACOUST. PLASTER | CT - CEILING TILE 1X1 | FT - FLOOR TILE | PI - PIPE INSULATION | SP - SPRAY-ON FIREPRFG. |
| BO - BOILER INSULATION | CP - CEILING PANEL 2X4 | JC - JOINT COMPOUND | PL-C - PLASTER CEILING | TA - TANK INSULATION |
| BR - BUILT-UP ROOF MAT'L | EF - ELBOW/FITTING | MA - MASTIC (GLUE) | PL-W - PLASTER WALL | VS - VINYL SHEET FLOORING |
| | | MISC - MISCELLANEOUS | RF - ROOF FLASHING | WB - WALLBOARD |

JP CONSULTING

Asbestos / Lead / DIO Services

190 CORUHNA AVE.
FAIRLAWN, OHIO 44130

Email: jprarat@hotmail.com

Cell Phone: 330-328-9817

RCS FORM

Request for Lab Analysis
Chain of Custody
Sample Log

REQUEST FOR LAB ANALYSIS - Page 2 of 2

Special Instructions: _____

PROJECT NAME VICTORENE BLDG.- Cleveland SAMPLE DATE 11-25-09 PROJECT NUMBER 2597

LAB NAME: IATL DATE REC'D BY LAB: 11-27-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH (X) 1-DAY () 2-DAY () 3-DAY () 5 DAY
 (X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () jprarat@karlrohrer.com
 () FAX RESULTS TO: _____ AT () _____
 () PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:
 AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
 BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
 OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-25-09	
RELINQUISHED TO:	_____	FEDERAL EXPRESS	11-25-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	FIELD SAMPLE ID NO.	CHECK IF: <input checked="" type="checkbox"/> ACM CODE <input type="checkbox"/> AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1125-13	WB	Bldg. 1 - Basement - S. end	0
	-14	CP	" - Basement - SE stairwell (2x2 dense pht sm. gosh)	0
	-15	PL-W	" - " " "	0
	-16	PL-W	" - " S. end	0

ACM CODES:
 AP - ACOUST. PLASTER CT - CEILING TILE 1X1 FT - FLOOR TILE PI - PIPE INSULATION SP - SPRAY-ON FIREPRFG.
 BO - BOILER INSULATION CP - CEILING PANEL 2X4 JC - JOINT COMPOUND PL-C - PLASTER CEILING TA - TANK INSULATION
 BR - BUILT-UP ROOF MAT'L EF - ELBOW/FITTING MA - MASTIC (GLUE) PL-W - PLASTER WALL RF - ROOF FLASHING VS - VINYL SHEET FLOORING
 WB - WALLBOARD MISC - MISCELLANEOUS

CERTIFICATE OF ANALYSIS

Client: IP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 11/30/2009 Project: Victorene Bldg - Cleveland Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801882	Description / Location: White Insulation		
Client No.: 1125-01	Bldg. 1-Boiler Rm.		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
40	Chrysotile	None Detected	None Detected
			60

Lab No.: 3801883	Description / Location: Lt. Grey Insulation		
Client No.: 1125-02	Bldg. 1-Boiler Rm.		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
95	Chrysotile	None Detected	None Detected
			5

Lab No.: 3801884	Description / Location: Lt. Yellow Fire Brick		
Client No.: 1125-03	Bldg. 1-Boiler Rm.		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

Lab No.: 3801885	Description / Location: Orange Insulation		
Client No.: 1125-04	Bldg. 1-Boiler Rm.		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: M. Mirza

Approved By: _____

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting	Report Date:	11/30/2009
	190 Corunna Ave.	Project:	Victorene Bldg - Cleveland
	Fairlawn OH 44333	Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3801886	Description / Location:	White/Tan Ceiling Tile
Client No.:	1125-05		Bldg. 1-Basement E. Rm.
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	50	Cellulose
		10	Mineral Wool

Lab No.:	3801887	Description / Location:	Lt. Tan Floor Tile; 9x9
Client No.:	1125-06		Bldg. 1-Basement S. End
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 1.3	Chrysotile	None Detected	None Detected
			PC 98.7

Lab No.:	3801888	Description / Location:	Orange/Gray Floor Tile; 12x12
Client No.:	1125-07		Bldg. 1-Basement S. End
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	2	Synthetic
			98

Lab No.:	3801888	Description / Location:	Yellow Mastic
Client No.:	1125-07		Bldg. 1-Basement S. End
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: M. Mirza

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 11/30/2009 Project: Victorene Bldg - Cleveland Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3801889	Description / Location: Off-White Ceiling Tile; 12x12		
Client No.: 1125-08	Bldg. 1-Basement S. End		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	80	Mineral Wool
			20

Lab No.: 3801890	Description / Location: Off-White Ceiling Tile; 12x12		
Client No.: 1125-09	Bldg. 1-Basement S. End		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	80	Mineral Wool
			20

Lab No.: 3801891	Description / Location: White/Tan Ceiling Tile; 2x4		
Client No.: 1125-10	Bldg. 1-Basement S. End		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	55	Cellulose
		5	Mineral Wool
			40

Lab No.: 3801892	Description / Location: Off-White Ceiling Tile; 12x12		
Client No.: 1125-11	Bldg. 1-Basement S. End		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	80	Mineral Wool
			20

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

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Analysis Performed By: M. Mirza

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting	Report Date:	11/30/2009
	190 Corunna Ave.	Project:	Victorene Bldg - Cleveland
	Fairlawn OH 44333	Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3801893	Description / Location:	White Joint Compound	
Client No.:	1125-12		Bldg. 1-Basement S. End	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.3	Chrysotile	None Detected	None Detected	PC 98.7

Lab No.:	3801894	Description / Location:	Blue/Tan/Off-White Sheetrock	
Client No.:	1125-13		Bldg. 1-Basement S. End	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	5	Cellulose	95

Lab No.:	3801895	Description / Location:	White/Tan Ceiling Tile; 2x2	
Client No.:	1125-14		Bldg. 1-Basement SE Stairwell	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	65	Cellulose	25
		10	Mineral Wool	

Lab No.:	3801896	Description / Location:	White/Lt. Grey Plaster	
Client No.:	1125-15		Bldg. 1-Basement SE Stairwell	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: M. Mirza

Date: 11/30/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting	Report Date:	11/30/2009
	190 Corunna Ave.	Project:	Victorene Bldg - Cleveland
	Fairlawn OH 44333	Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3801897	Description / Location:	White Plaster	
Client No.:	1125-16		Bldg. 1-Basement S. End	
% Asbestos	Type	% Non-Asbestos Fibrous Material	Type	% Non-Fibrous Material
None Detected	None Detected	None Detected	None Detected	100

NIST-NVLAP No. 101165-0**NY-DOH No. 11021****AIHA Lab No. 100188**

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Analysis Performed By: M. Mirza**Date:** 11/30/2009

JP CONSULTING

Asbestos / Lead / IAQ Services
 190 CORUNNA AVE.
 FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com
 Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis
 Chain of Custody
 Sample Log

REQUEST FOR LAB ANALYSIS - Page 1 of 3

SPECIAL INSTRUCTIONS: _____

PROJECT NAME: VICTOREEN BLDG. Bldg. 1 SAMPLE DATE: 11-27-09 PROJECT NUMBER: 2597
 LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY
 (X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
 () FAX RESULTS TO: _____ AT () _____
 () PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:
 AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
 BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
 OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-27-09	
RELINQUISHED TO:		FedEx	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1127-01	CT1	2nd Floor - S. end	0
	-02	CT2	" - "	0
	-03	MA	" - used on CT	0
	-04	CT1	" - S. end	0
	-05	CT3	" - SW room	0
	-06	CT3	" - " "	0
	-07	CPI	" - WSW room	0
	-08	CPI	" - " "	0
	-09	PI	" - SW room	25%
	-10	PL-W	" - " "	0
	-11	PL-W	" - S. room	0
	-12	FT/MA	" - S end (9x9 tan) TILE BLK MA	8 0

CODES:

AP - ACOUSTICAL PLASTER	CB - COVE BASE	FT - FLOOR TILE	PI - PIPE INSULATION
BO - BOILER INSULATION	CT - CEILING TILE 1'X1'	JC - JOINT COMPOUND	PL-C - PLASTER CEILING
BR - BUILT-UP ROOF	CP - CEILING PANEL 2'X4'	MA - MASTIC	PL-W - PLASTER WALL
CMA - CARPET MASTIC	EF - ELBOW/FITTING	MISC - MISCELLANEOUS	RF - ROOF FLASHING
			SP - SPRAYED FIREPROOFING
			TA - TANK INSULATION
			VS - VINYL SHEET FLOOR
			WB - WALLBOARD

JP CONSULTING

Asbestos / Lead / IAQ Services

190 CORUNNA AVE.
FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com
Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis
Chain of Custody
Sample Log

REQUEST FOR LAB ANALYSIS - Page 2 of 3

SPECIAL INSTRUCTIONS: _____

PROJECT NAME: VICTOREEN - Bldg. 1 SAMPLE DATE: 11-27-09 PROJECT NUMBER: 2597
LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY
(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
() FAX RESULTS TO: _____ AT () _____
() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-27-09	
RELINQUISHED TO:		FedEX	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1127-13	WB	2nd Floor - SE area (WB above CT)	0
	-14	MA	" " - " " (MA on CT)	0
	-15	TR	" " - " " (panel w/styrofoam)	25%
	-16	JC	" " - SW office wall	0
	-17	WB	" " - S end wall	0
	-18	FT	" " - SE restroom (12x12 tan)	TILE YEL. MA TRACE 0
	-19	JC	" " - ESE office	1.9%
	-20	CT3	" " - E office	0
	-21	CP2	" " - " "	0
	-22	misc.	" " - central room (sheet flooring)	0
	-23	misc.	" " - NE Mech Rm. (flex conn.)	50%
	-24	caulk	" "	0

CODES:

AP - ACOUSTICAL PLASTER	CB - COVE BASE	FT - FLOOR TILE	PI - PIPE INSULATION	SP - SPRAYED FIREPROOFING
BO - BOILER INSULATION	CT - CEILING TILE 1'X1'	JC - JOINT COMPOUND	PL-C - PLASTER CEILING	TA - TANK INSULATION
BR - BUILT-UP ROOF	CP - CEILING PANEL 2'X4'	MA - MASTIC	PL-W - PLASTER WALL	VS - VINYL SHEET FLOOR
CMA - CARPET MASTIC	EF - ELBOW/FITTING	MISC - MISCELLANEOUS	RF - ROOF FLASHING	WB - WALLBOARD

JP CONSULTING

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 FAIRLAWN, OHIO 44333

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RCS FORM

Request for Lab Analysis
 Chain of Custody
 Sample Log

REQUEST FOR LAB ANALYSIS - Page 3 of 3

SPECIAL INSTRUCTIONS: _____

PROJECT NAME: VICTOREEN - Bldg. 1 SAMPLE DATE: 11-27-09 PROJECT NUMBER: 2597
 LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY
 (X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
 () FAX RESULTS TO: _____ AT () _____
 () PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:
 AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
 BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
 OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-27-09	
RELINQUISHED TO:		FedEx	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1127-25	PL-W	2nd Floor - NW area	0
	-26	CP3	" " - NW area	0
	-27	PL-W	" " - NE restroom	0
	-28	caulk	" " - " "	1.4%
	-29	FD	" " - " "	60%

CODES:

AP - ACOUSTICAL PLASTER BO - BOILER INSULATION BR - BUILT-UP ROOF CMA - CARPET MASTIC	CB - COVE BASE CT - CEILING TILE 1'X1' CP - CEILING PANEL 2'X4' EF - ELBOW/FITTING	FT - FLOOR TILE JC - JOINT COMPOUND MA - MASTIC MISC - MISCELLANEOUS	PI - PIPE INSULATION PL-C - PLASTER CEILING PL-W - PLASTER WALL RF - ROOF FLASHING	SP - SPRAYED FIREPROOFING TA - TANK INSULATION VS - VINYL SHEET FLOOR WB - WALLBOARD
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CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 12/2/2009
Project: Victoreen Bldg
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803701	Description / Location:	White/Brown Ceiling Tile	
Client No.:	1127-01		2nd Floor-S.End	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	90	Cellulose	10

Lab No.:	3803702	Description / Location:	White/Brown Ceiling Tile	
Client No.:	1127-02		2nd Floor-S.End	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	90	Cellulose	10

Lab No.:	3803703	Description / Location:	Brown Mastic	
Client No.:	1127-03		2nd Floor-Used On CT	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803704	Description / Location:	White/Brown Ceiling Tile	
Client No.:	1127-04		2nd Floor-S.End	
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	90	Cellulose	10

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Approved By: _____

Date: 12/2/2009

Frank E. Ehrenfeld, III
Laboratory Director

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803705	Description / Location:	Off-White Ceiling Tile 2nd Floor-S.W.Room
Client No.:	1127-05		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u> 40

Lab No.:	3803706	Description / Location:	Off-White Ceiling Tile 2nd Floor-S.W.Room
Client No.:	1127-06		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u> 40

Lab No.:	3803707	Description / Location:	White/Tan Ceiling Tile 2nd Floor-W.S.W. Room
Client No.:	1127-07		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	35	Cellulose
		35	Fibrous Glass
			<u>% Non-Fibrous Material</u> 30

Lab No.:	3803708	Description / Location:	Off-White/Tan Ceiling Tile 2nd Floor-W.S.W. Room
Client No.:	1127-08		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	35	Cellulose
		35	Fibrous Glass
			<u>% Non-Fibrous Material</u> 30

NIST-NVLAP No. 101165-0

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803709	Description / Location:	White Insulation
Client No.:	1127-09		2nd Floor-S.W. Room
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
25	Chrysotile	None Detected	None Detected
			75

Lab No.:	3803710	Description / Location:	White/Grey Plaster
Client No.:	1127-10		2nd Floor-S.W. Room
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
			100

Lab No.:	3803711	Description / Location:	White/Grey Plaster
Client No.:	1127-11		2nd Floor-S. Room
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803712	Description / Location:	Tan Floor Tile; 9x9 2nd Floor-S. End
Client No.:	1127-12		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 7.5	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u> PC 92.5

Lab No.:	3803712	Description / Location:	Black Mastic 2nd Floor-S. End	Layer No.: 2
Client No.:	1127-12			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803713	Description / Location:	Off-White/Tan Sheetrock 2nd Floor-S.E. Area
Client No.:	1127-13		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	15	Cellulose
			<u>% Non-Fibrous Material</u> 88

Lab No.:	3803714	Description / Location:	Brown Mastic 2nd Floor-S.E. Area
Client No.:	1127-14		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			<u>% Non-Fibrous Material</u> 100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803715	Description / Location:	Grey Transite 2nd Floor-S.E. Area
Client No.:	1127-15		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
25	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u> 75

Lab No.:	3803716	Description / Location:	White Joint Compound 2nd Floor-S.W. Office Wall
Client No.:	1127-16		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			<u>% Non-Fibrous Material</u> 100

Lab No.:	3803717	Description / Location:	White/Tan Sheetrock 2nd Floor-S.End Wall
Client No.:	1127-17		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	15	Cellulose
			<u>% Non-Fibrous Material</u> 85

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803718	Description / Location:	Tan Floor Tile; 12x12 2nd Floor-S.E.Restroom
Client No.:	1127-18		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 0.25	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u> PC 99.75

Lab No.:	3803718	Description / Location:	Yellow Mastic 2nd Floor-S.E.Restroom	Layer No.:	2
Client No.:	1127-18				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
None Detected	None Detected	None Detected	None Detected	100	

Lab No.:	3803719	Description / Location:	Tan Joint Compound 2nd Floor-ESE Office
Client No.:	1127-19		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 1.9	Chrysotile	None Detected	None Detected
			<u>% Non-Fibrous Material</u> PC 98.1

Lab No.:	3803720	Description / Location:	Off-White Ceiling Tile 2nd Floor-E. Office
Client No.:	1127-20		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	60	Fibrous Glass
			<u>% Non-Fibrous Material</u> 40

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/2/2009 Project: Victoreen Bldg Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803721	Description / Location: White/Tan Ceiling Tile		
Client No.: 1127-21	2nd Floor-E. Office		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	35	Cellulose
		35	Fibrous Glass

Lab No.: 3803722	Description / Location: Brown Vinyl Sheet Flooring		
Client No.: 1127-22	2nd Floor-Central Room		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	30	Cellulose
			70

Lab No.: 3803723	Description / Location: Grey Woven Fibers		
Client No.: 1127-23	2nd Floor-N.E. Mech. Room. (Flex Conn.)		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>% Non-Fibrous Material</u>
50	Chrysotile	35	Cellulose
			15

Lab No.: 3803724	Description / Location: Brown Glazing		
Client No.: 1127-24	2nd Floor-N.E. Mech. Room. (Flex Conn.)		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/2/2009
		Project:	Victoreen Bldg
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803725	Description / Location:	White/Grey Plaster 2nd Floor-NW Area	
Client No.:	1127-25			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.:	3803726	Description / Location:	White/Tan Ceiling Tile 2nd Floor-NW Area	
Client No.:	1127-26			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	35	Cellulose	30
		35	Fibrous Glass	

Lab No.:	3803727	Description / Location:	White/Grey Plaster 2nd Floor-NE Restroom	
Client No.:	1127-27			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	Trace	Cellulose	100

Lab No.:	3803728	Description / Location:	White Glazing 2nd Floor-NE Restroom	
Client No.:	1127-28			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.4	Chrysotile	None Detected	None Detected	PC 98.6

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 12/2/2009

Project: Victoreen Bldg

Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803729	Description / Location: Grey Insulation			
Client No.: 1127-29	2nd Floor-NE Restroom			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
60	Chrysotile	20	Cellulose	20

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

JP CONSULTING

Asbestos / Lead / IAQ Services
190 CORUNNA AVE.
FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com
Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis
Chain of Custody
Sample Log

REQUEST FOR LAB ANALYSIS - Page 1 of 2

SPECIAL INSTRUCTIONS: _____

PROJECT NAME VICTOREEN - Building 1 SAMPLE DATE 11-28-09 PROJECT NUMBER 2597
LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY
(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
() FAX RESULTS TO: _____ AT () _____
() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-28-09	
RELINQUISHED TO:		FedEx	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1127-31	JC	1st Floor	0
	-32	JC	"	0
	1128-01	PI	3rd Floor (cork insul.)	0
	-02	EF	" (cork insul.)	0
	-03	FT/MA	" (9x9 tan)	TILE BLK MA 6.0%
	-04	JC	"	0
	-05	caulk	"	1.5%
	-06	WB	"	0
	-07	PL-W	"	BASE SKIM TRACE
	-08	CT	"	0
	-09	CT	"	0
	-10	PL-W	"	BASE SKIM 0.5%

CODES:

AP - ACOUSTICAL PLASTER	CB - COVE BASE	FT - FLOOR TILE	PI - PIPE INSULATION	SP - SPRAYED FIREPROOFING
BO - BOILER INSULATION	CT - CEILING TILE 1'X1'	JC - JOINT COMPOUND	PL-C - PLASTER CEILING	TA - TANK INSULATION
BR - BUILT-UP ROOF	CP - CEILING PANEL 2'X4'	MA - MASTIC	PL-W - PLASTER WALL	VS - VINYL SHEET FLOOR
CMA - CARPET MASTIC	EF - ELBOW/FITTING	MISC - MISCELLANEOUS	RF - ROOF FLASHING	WB - WALLBOARD

JP CONSULTING

Asbestos / Lead / IAQ Services

190 CORUNNA AVE.

FAIRLAWN, OHIO 44333

Email: jprarat@hotmail.com

Cell Phone: 330-328-7817

RCS FORM

Request for Lab Analysis
Chain of Custody
Sample Log

REQUEST FOR LAB ANALYSIS - Page 2 of 2

SPECIAL INSTRUCTIONS: _____

PROJECT NAME VICTOREEN - Building 1 SAMPLE DATE 11-28-09 PROJECT NUMBER 2597
LAB NAME: IATL DATE REC'D BY LAB: 12-1-09 LAB PHONE NO.: _____

TURNAROUND REQUESTED: () RUSH () 1-DAY (X) 2-DAY () 3-DAY () 5 DAY
(X) EMAIL RESULTS TO: (X) jprarat@hotmail.com () _____
() FAX RESULTS TO: _____ AT () _____
() PHONE RESULTS TO: _____ AT () 330-328-7817 () _____

ANALYSIS REQUESTED:

AIR: () PCM (NIOSH 7400) () TEM-AHERA () OSHA (ID-160) () Fungal Spore Count
BULK: (X) PLM (EPA/600/R-93/116) () Gravimetric-PLM (ELAP 198.1) () Point Count () Gravimetric-TEM (ELAP 198.4)
OTHER: () Lead () Mold Bulk () Mold Swab or Tape () See SPECIAL INSTRUCTIONS above

CHAIN OF CUSTODY	▼(SIGN NAME)▼	REPRESENTING	DATE	TIME
SAMPLER:	<i>James Prarat</i>	JP CONSULTING	11-28-09	
RELINQUISHED TO:		FedEx	11-30-09	
RELINQUISHED TO:		IATL		

SAMPLE LOG

LAB NUMBER	SAMPLE ID NO.	CHECK IF: (X) ACM CODE () AIR VOL.	SAMPLE ID / LOCATION	RESULT % ASBESTOS
	1128-11	CT/MA	3rd Floor	0
	-12	JC	" "	1.6%
	-13	WB/JC	4th Floor	1.5%
	-14	PL-W	"	Trace
	-15	FT/MA	" (9x9 rust)	0
	-16	caulkr	"	0
	-17	misc.	Roof-wrap on water tank drain	0
	-18	RF	Roof flashing	5%
	-19	misc.	Penthouse-transite insulators	30%
	-20	PI	"	30%

CODES:

AP - ACOUSTICAL PLASTER	CB - COVE BASE	FT - FLOOR TILE	PI - PIPE INSULATION	SP - SPRAYED FIREPROOFING
BO - BOILER INSULATION	CT - CEILING TILE 1'X1'	JC - JOINT COMPOUND	PL-C - PLASTER CEILING	TA - TANK INSULATION
BR - BUILT-UP ROOF	CP - CEILING PANEL 2'X4'	MA - MASTIC	PL-W - PLASTER WALL	VS - VINYL SHEET FLOOR
CMA - CARPET MASTIC	EF - ELBOW/FITTING	MISC - MISCELLANEOUS	RF - ROOF FLASHING	WB - WALLBOARD

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/3/2009 Project: Victoreen Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803679	Description / Location: White Joint Compound			
Client No.: 1127-31	1st Floor			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3803680	Description / Location: White Joint Compound			
Client No.: 1127-32	1st Floor			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3803681	Description / Location: Brown/Black Cork/Tar			
Client No.: 1128-01	3rd Floor			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3803682	Description / Location: Brown/Black Cork/Tar			
Client No.: 1128-02	3rd Floor			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Approved By: _____

Date: 12/2/2009

Frank E. Ehrenfeld, III
Laboratory Director

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/3/2009 Project: Victoreen Project No.: 2597
---	--

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803683	Description / Location: Brown Floor Tile; 9x9 3rd Floor			
Client No.: 1128-03				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 6.2	Chrysotile	None Detected	None Detected	PC 93.8

Lab No.: 3803683	Description / Location: Black Mastic 3rd Floor			Layer No.: 2
Client No.: 1128-03				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3803684	Description / Location: White Joint Compound 3rd Floor			
Client No.: 1128-04				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected	100

Lab No.: 3803685	Description / Location: Grey Glazing 3rd Floor			
Client No.: 1128-05				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.5	Chrysotile	None Detected	None Detected	PC 98.5

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/3/2009
		Project:	Victoreen
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803686	Description / Location:	Off-White/Tan Sheetrock 3rd Floor
Client No.:	1128-06		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	5	Cellulose
			<u>% Non-Fibrous Material</u>
			95

Lab No.:	3803687	Description / Location:	Tan/Grey Plaster 3rd Floor
Client No.:	1128-07		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC Trace	Actinolite	Trace	Cellulose
			<u>% Non-Fibrous Material</u>
			100

Lab No.:	3803687	Description / Location:	Off-White Texture 3rd Floor	Layer No.:	2
Client No.:	1128-07				
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>	
None Detected	None Detected	None Detected	None Detected	100	

Lab No.:	3803688	Description / Location:	Tan Ceiling Tile 3rd Floor
Client No.:	1128-08		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
		75	Fibrous Glass
			<u>% Non-Fibrous Material</u>
			25

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

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Analysis Method: EPA 500/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solcibello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/3/2009 Project: Victoreen Project No.: 2597
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BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803689	Description / Location: White/Tan Ceiling Tile		
Client No.: 1128-09	3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
		75	Fibrous Glass
			25

Lab No.: 3803690	Description / Location: White/Grey Plaster		
Client No.: 1128-10			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>% Non-Fibrous Material</u>
PC 0.5	Chrysotile	Trace	Cellulose
		Trace	Hair
			PC 99.5

Lab No.: 3803690	Description / Location: Black Tar		Layer No.: 2
Client No.: 1128-10			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	None Detected	None Detected
			100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date: 12/3/2009 Project: Victoreen Project No.: 2597
---	--

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803691	Description / Location: White/Tan Ceiling Tile		
Client No.: 1128-11	3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	Trace	Cellulose
		75	Fibrous Glass
			25

Lab No.: 3803691	Description / Location: Brown Mastic		Layer No.: 2
Client No.: 1128-11	3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
None Detected	None Detected	None Detected	None Detected
			100

Lab No.: 3803692	Description / Location: Off-White Joint Compound		
Client No.: 1128-12	3rd Floor		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>
PC 1.5	Chrysoile	None Detected	None Detected
			PC 98.4

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solcibello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client:	JP Consulting 190 Corunna Ave. Fairlawn OH 44333	Report Date:	12/3/2009
		Project:	Victoreen
		Project No.:	2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.:	3803693	Description / Location:	White/Tan Sheetrock 4th Floor	
Client No.:	1128-13			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
None Detected	None Detected	12	Cellulose	88

Lab No.:	3803693	Description / Location:	Tan Joint Compound 4th Floor	Layer No.: 2
Client No.:	1128-13			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 1.5	Chrysotile	None Detected	None Detected	PC 98.5

Lab No.:	3803694	Description / Location:	White/Grey Plaster 4th Floor	
Client No.:	1128-14			
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC Trace	Chrysotile	Trace	Hair	100

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Method: EPA 600/R-93/116

Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at $\leq 0.25\%$ by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting 190 Corona Ave. Fairlawn OH 44333	Report Date: 12/3/2009 Project: Victoreen Project No.: 2597
--	--

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803695	Description / Location: Brown Floor Tile; 9x9 4th Floor	
Client No.: 1128-15		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>
PC 5.9	Chrysotile	None Detected
		<u>Type</u>
		None Detected
		<u>% Non-Fibrous Material</u>
		PC 94.1

Lab No.: 3803695	Description / Location: Black Mastic 4th Floor	Layer No.: 2
Client No.: 1128-15		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>
None Detected	None Detected	None Detected
		<u>Type</u>
		None Detected
		<u>% Non-Fibrous Material</u>
		100

Lab No.: 3803696	Description / Location: Off-White Glazing 4th Floor	
Client No.: 1128-16		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>
None Detected	None Detected	2
		<u>Type</u>
		Other
		<u>% Non-Fibrous Material</u>
		98

Lab No.: 3803697	Description / Location: Black Roof Material Roof-Water Tank Drain	
Client No.: 1128-17		
<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>
None Detected	None Detected	40
		<u>Type</u>
		Cellulose
		5
		Hair
		<u>% Non-Fibrous Material</u>
		55

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Analysis Performed By: L. Solebello

Date: 12/2/2009

CERTIFICATE OF ANALYSIS

Client: JP Consulting
190 Corunna Ave.
Fairlawn OH 44333

Report Date: 12/3/2009
Project: Victoreen
Project No.: 2597

BULK SAMPLE ANALYSIS SUMMARY

Lab No.: 3803698 Description / Location: Black Roof Material
Client No.: 1128-18 Roof Flashing

<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
PC 4.9	Chrysotile	40	Cellulose	PC 55.1

Lab No.: 3803699 Description / Location: Grey Transite
Client No.: 1128-19 Penthouse

<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
30	Chrysotile	None Detected	None Detected	70

Lab No.: 3803700 Description / Location: Off-White Insulation
Client No.: 1128-20 Penthouse

<u>% Asbestos</u>	<u>Type</u>	<u>% Non-Asbestos Fibrous Material</u>	<u>Type</u>	<u>% Non-Fibrous Material</u>
30	Chrysotile	None Detected	None Detected	70

NIST-NVLAP No. 101165-0

NY-DOH No. 11021

AIHA Lab No. 100188

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Comments: (PC) Indicates Stratified Point Count Method performed. Method not performed unless stated. Quantification at <0.25% by volume is possible with this method. (PC-Trace) represents this limit of quantitation. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed. Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, negative PLM results cannot be guaranteed. Electron Microscopy can be used as a confirming technique. Regulatory Limit is based upon the sample matrix.

Analysis Performed By: L. Solebello

Date: 12/2/2009

State of Ohio
Department of Health
Division of Quality Assurance - Asbestos Program

Asbestos Hazard Abatement Specialist

James A Prarat
Karl Rohrer Associates
3810 Ridgewood Road
Akron OH 44321



Certification Number Expiration Date
AS2136 08/30/2009

DOB: 08/16/1951

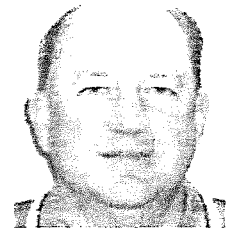
This certification is issued pursuant to Chapter 3710 of the Revised Code and 3701-34 of the Ohio Administrative Code

Certification Card is not valid if altered

State of Ohio
Department of Health
Division of Quality Assurance - Asbestos Program

Asbestos Hazard Abatement Project Designer

James A Prarat
Karl Rohrer Associates
3810 Ridgewood Road
Akron OH 44321



Certification Number Expiration Date
PD60117 10/13/2009

DOB: 08/16/1951

This certification is issued pursuant to Chapter 3710 of the Revised Code and 3701-34 of the Ohio Administrative Code

Certification Card is not valid if altered

State of Ohio
Department of Health
Division of Quality Assurance - Asbestos Program

Asbestos Hazard Evaluation Specialist

James A Prarat
Karl Rohrer Associates
3810 Ridgewood Road
Akron OH 44321



Certification Number Expiration Date
ES3073 12/21/2009

DOB: 08/16/1951

This certification is issued pursuant to Chapter 3710 of the Revised Code and 3701-34 of the Ohio Administrative Code

Certification Card is not valid if altered

Exhibit 2: Original Notification



City of Cleveland
Frank G. Jackson, Mayor

Original picked up by
Steve Myland on
Dec. 23, 2009 *apts*



Acknowledgment of Receipt of Notification of Demolition and Renovation

JJK Environmental
9503 Easton Avenue
Cleveland, OH 44104

Date: 12/17/09

Notification Number: CL10108


Subject: Application received 12/9/09, postmarked 12/9/09, for asbestos removal and disposal from, and/or demolition at Victoreen/ 10101Woodland Avenue in Cleveland.

Status: Accepted; work may begin

As required by the National Emission Standard for Asbestos (NESHAP), a Notification of Demolition and Renovation for the above-mentioned location has been received by the Cleveland Division of Air Quality (CDAQ). CDAQ has reviewed the notification as required by the Air Pollution Code of the City of Cleveland, and state and federal laws. Accordingly, the work specified in the notification may begin, subject to the following conditions:

1. All work practices shall comply with applicable sections of the Code of Federal Regulations (CFR), the Ohio Administrative Code (OAC), and the Codified Ordinances of the City of Cleveland. See Addendum for Building and Housing Dep't permits. Any non-compliance voids this authorization.
2. Asbestos removal starting on: 12/23/09, and completing by: 1/15/10.
3. Demolition or renovation starting on: 12/23/09, and completing by: 2/28/10.
If notification was for demolition only, and the structure is a subject facility as described in the asbestos NESHAP, this letter is not valid unless the absence of regulated asbestos containing material (RACM) has been documented by an asbestos survey, or the RACM has been properly abated.
4. Amount of asbestos to be removed: 4,000sf; Cat I 65,800sf; Cat II 2,500sf
5. Landfill: Minerva Enterprises
6. A copy of the disposal receipt must be submitted to this office within thirty (30) days of the completion of the job.

This authorization is not renewable or transferable, and will expire one year from the starting date, or upon the completion of the project scope specified in the notification, whichever is sooner. This letter also serves as notification of receipt of your fee in the amount of fifty dollars.


Mike Krzywicki, Deputy Commissioner of Air Quality

cc: David Cooper, Room 512 – City Hall

This letter acknowledges that the Cleveland Division of Air Quality (CDAQ) has received a Notification of Demolition and Renovation (notification) for the property indicated. This letter does not confirm the accuracy of information contained in the notification and asbestos survey used in the preparation of the notification. Accuracy of information is the responsibility of the owner/operator and is attested to by the person whose signature appears on the notification. Be advised this letter in no way waives the right of the City of Cleveland's Division of Air Quality, Ohio EPA, or U.S. EPA to pursue an enforcement action for violation of any applicable laws. The owner/operator remains subject to all applicable local, state, and federal rules and regulations before, during, and after the abatement, renovation, or demolition.



Addendum: Permits Required by Cleveland Department of Building and Housing

3105.01 Permits Required; Exceptions

- (a) Except as provided in OAC 4101:2-1-13(B), no person, firm or corporation shall erect, construct, enlarge, alter, repair, move or demolish a building or structure, or install any equipment or other appurtenances the installation of which is regulated by this OBBC or Building Code, or cause the same to be done, without first making application to the Commissioner [of Building] and obtaining a permit therefor unless OBBC or this Building Code specifically provides that such work may be done without a permit.
- (b) Separate application shall be made to the Commissioner [of Building] and separate permits obtained for electrical work, plumbing, elevators, moving stairways, power operated dumbwaiters, heating devices and installations, mechanical refrigeration systems, outdoor signs and display structures, and for such other equipment and appurtenances for which separate permits are required by OBBC or this Building Code, or by the rules for applications and permits issued by the Commissioner.
- (c) Separate applications shall be made to the Fire Chief and separate permits obtained from the Chief for the storage, use or handling of combustibles, hazardous chemicals, explosives, flammables, and other dangerous substances, articles, compounds, or mixtures, and for the installation or alteration of required fire alarm systems and required fire-extinguishing equipment.

277.02 Demolition of Buildings

- (a) No person shall cause or allow demolition of any existing building, structure or portion thereof within the City without obtaining a permit to demolish from the Commissioner of Building of the City of Cleveland. The Commissioner of Building shall forward to the Commissioner [of Air Quality] a copy of each permit to demolish.
- (b) Application for permit to demolish shall be made on forms prepared by the Commissioner of Building and shall contain such information as the Commissioners of Building and [Air Quality] deem necessary.
- (c) In addition to the requirements of Section 277.07, procedures to be followed to prevent particulate matter from becoming airborne during demolition of buildings or structures shall include, but not be limited to, the following:
- (1) Asbestos materials used to insulate or fireproof any boiler, pipe or load-supporting structural member shall be wetted and removed before wrecking of load-supporting members is begun. This procedure shall be followed, where practicable, with all other asbestos-lined surfaces;
 - (2) Asbestos containing debris shall be wetted adequately to insure that such debris remains wet during all stages of demolition and related handling operations;
 - (3) No pipe or load-supporting structural member covered with asbestos insulating or fireproofing material shall be dropped or thrown to the ground but shall be lowered or taken to ground level;
 - (4) No asbestos containing debris shall be thrown or dropped to the ground from any floor to any floor below. For buildings or structures fifty (50) feet or greater in heights, asbestos debris shall be transported to the ground via dust-tight chutes or containers.
- (d) A person shall be assigned supervisory authority for all aspects of the demolition operation and shall be available at the demolition site at all times during the demolition operation.
- (e) Failure of any person to comply with any of the requirements of subsections (c) and (d) hereof shall be sufficient grounds for the Commissioner of Building to revoke any permit.
- (f) In cases of emergency any existing building, structure or portion thereof may be demolished prior to obtaining a permit to demolish from the Commissioner of Building if such building, structure or portion thereof is or may be dangerous to human safety or property if the demolition was deferred.

Evaluation Checklist for Notifications of Demolition and Renovation

CL Number 10 108 : 10101 Woodland Avenue

<u>Section</u>	<u>Evaluation</u>
I:	OK.
II:	OK
III:	OK.
IV:	OK.
V:	OK.
VI:	OK.
VII:	OK.
VIII:	OK.
IX:	OK.
X:	OK.
XI:	OK.
XII:	OK.
XIII:	OK.
XIV:	OK.
XV:	OK.
XVI:	OK.
XVII:	OK.
XVIII:	OK.

Survey was provided

Do not Request Survey

Request Full Survey

Request Summary of Survey

Accepted

Not Accepted (Explain below)

Comments: Will need to submit revision including the square footage of window glazing NOT to be removed, and amount of roofing material.

Contacted: N/A

Application Reviewed by: Bryan Sokolowski on December 23, 2009

Facility File and L:\Data\Facilities\+ Programs\Asbestos\Notification Reviews\CL 10 108\Checklist for Asbestos Notification.doc

OHIO ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Postmark Hand Delivered Dec 9 2009	Date Received 11/10/08	Notification #																												
I. Type of Notification (check one): <input checked="" type="checkbox"/> Original <input type="checkbox"/> Revised <input type="checkbox"/> Canceled																															
II. Facility Description (include building name, number, and floor or room number) Building Name: <u>VICTOREEN</u> Address: <u>10101 WOODLAND AVE</u> City: <u>CLEVELAND</u> State: <u>OHIO</u> Zip Code: <u>44104</u> County: <u>CUYAHOGA</u> Site Location (specific): <u>10101 WOODLAND AVE</u> Building Size (square feet): <u>159,672</u> # of Floors: <u>5</u> Age in Years: <u>90</u> Present Use: <u>VACANT</u> Prior Use: <u>RETAIL SALES</u>																															
III. Type of Operation (check one): <input checked="" type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training																															
IV. Is Asbestos Present? (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No																															
V. Facility Information Owner Name: <u>HARPER INDUSTRIES, INC.</u> Address: <u>4579 POTH RD</u> City: <u>COLUMBUS</u> State: <u>OH</u> Zip Code: <u>43213</u> Contact: <u>STEVEN HYLAND</u> Telephone: <u>(614) 579-5566</u> Fax: <u>(216) 662-6316</u> Removal Contractor Name: <u>JJK ENVIRONMENTAL</u> License # <u>AS22096</u> Address: <u>9503 EASTON AVE</u> City: <u>CLEVELAND</u> State: <u>OH</u> Zip Code: <u>44104</u> Contact: <u>JEFFERY KELLOGG</u> Telephone: <u>(216) 240-4114</u> Fax: <u>(216) 938-8776</u> Other Operator (demolition/general): <u>HARPER INDUSTRIES, INC</u> License # <u>1575128 - STATE OF OHIO</u> Address: <u>4579 POTH RD</u> City: <u>COLUMBUS</u> State: <u>OH</u> Zip Code: <u>43213</u> Contact: <u>STEVEN HYLAND</u> Telephone: <u>(614) 579-5566</u> Fax: <u>(216) 662-6316</u>																															
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II nonfriable ACM: <u>Bulk Sampling; TESTING BY IATA</u> <u>ANALYSIS METHOD - EPA 600/R-93/116</u> Ohio Asbestos Hazard Evaluation Specialist: <u>Jeffery Kellogg</u> <u>AS 22096</u> <div style="display: flex; justify-content: space-between; width: 100%;"> Name Certification # </div>																															
VII. Approximate Amount of Asbestos Materials: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">RACM to be Removed</th> <th colspan="2">Nonfriable Asbestos Material to be Removed</th> <th colspan="2">Nonfriable Asbestos Material NOT to be Removed</th> </tr> <tr> <th>Category I</th> <th>Category II</th> <th>Category I</th> <th>Category II</th> </tr> </thead> <tbody> <tr> <td>Pipes (linear feet)</td> <td><u>4,000</u></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Surface Area (square feet)</td> <td><u>6,5800 FLOOR TIME</u></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Facility Components (cubic feet)</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>					RACM to be Removed	Nonfriable Asbestos Material to be Removed		Nonfriable Asbestos Material NOT to be Removed		Category I	Category II	Category I	Category II	Pipes (linear feet)	<u>4,000</u>					Surface Area (square feet)	<u>6,5800 FLOOR TIME</u>					Facility Components (cubic feet)					
	RACM to be Removed	Nonfriable Asbestos Material to be Removed				Nonfriable Asbestos Material NOT to be Removed																									
		Category I	Category II	Category I	Category II																										
Pipes (linear feet)	<u>4,000</u>																														
Surface Area (square feet)	<u>6,5800 FLOOR TIME</u>																														
Facility Components (cubic feet)																															
VIII. Scheduled Dates Demolition or Renovation: Start: <u>12-23-09</u> Complete: <u>2-28-2010</u>																															
IX. Dates for Asbestos Removal (MM/DD/YY) Start: <u>12-23-09</u> Complete: <u>1-15-2010</u>																															
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday																								
Hours of Operation:	<u>7-3:30</u>	<u>7-3:30</u>	<u>7-3:30</u>	<u>7-3:30</u>	<u>7-3:30</u>																										

Complete all unshaded spaces, except demolitions which involve less than 260 linear feet, 160 square feet, or 35 cubic feet of RACM, need not complete spaces VI, XI, XII, XIII, XIV, and XV. Notifications for Emergency Demolition or Emergency Renovation must supply attachments.

OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION

X. Description of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components:
Systematic Demolition of STRUCTURE, USING A TRACK BACKHOE W/BUCKET
OTHER EXCAVATION EQUIPMENT

XI. Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: Personal respirator on operator for Emissions control. WET METHODS will be used during all demolition Activities
Windows will be encapsulated and duct TAPE - All MATERIALS HAULED TO Appropriate LANDFILL

XII. Waste Transporter #1
Name: MINERVA ENTERPRISES
Address: 9000 MINERVA RD PO BOX 709
City: WAYNESBURG State: OH Zip Code: 44688
Contact: STEVE CHANDLER Telephone: (330) 866-3435 Fax: (330) 866-3488
Waste Transporter #2
Name: _____
Address: _____
City: _____ State: _____ Zip Code: _____
Contact: _____ Telephone: () Fax: ()

XIII. Waste Disposal
Name: MINERVA LANDFILL
Address: 9000 MINERVA RD
City: WAYNESBURG State: OH Zip Code: 44688
Contact: STEVE CHANDLER Telephone: (330) 866-3435 Fax: (330) 866-3488

XIV. Emergency Demolition (complete Item XIV and all other sections, only if this project is an Emergency Demo.)
1. Attach a copy of the Order to this notice.
2. Name of Authority Issuing Order: _____ Title: _____
3. Authority of Order (Citation of Code): _____
4. Date of Order (MM/DD/YY): _____ Date Ordered to Begin: _____

XV. Emergency Renovation (Attach separate sheet with the following information if project is Emergency Reno.)
1. Date and Hour of the Emergency
2. Description of the Sudden, Unexpected Event
3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden.

XVI. Description of procedures to be followed in the event that unexpected RACM is found or nonfriable ACM becomes crumbled, pulverized or reduced to powder. STOP Demolition Activities, WET DOWN
Asbestos MATERIAL - COVER W/ POLY - CONTACT AHERS Person

XVII. I certify that an individual trained in the provisions of NESHAPS (40 CFR PART 61, SUBPART M) will be on-site during the Demolition or Renovation and evidence that the required training has been accomplished by this person will be available during normal business hours.
Signature of Owner/Operator: [Signature] Date: 12-9-09 Type or Print Name and Title: STEVEN HYLAND VP

XVIII. I acknowledge the existence of laws prohibiting the submission of false or misleading statements and I certify that facts contained in this notification are true, accurate, and complete.
Signature of Owner/Operator: [Signature] Date: 12-9-09 Type or Print Name and Title: STEVEN HYLAND VP

Original Notification must be mailed or hand delivered at least ten working days (Monday-Friday excluding weekends) before demolition or renovation begins, except emergency demolitions and emergency renovations (see regulation) which must be submitted as soon as possible before operations begin. (Form Revised 11/12/97)

Exhibit 3: City of Cleveland Department of Building & Housing Permit

VI. PROJECT DESCRIPTION (Describe in detail proposed work and use of building)
BY PLAN EXAMINER

NOTES

VII. A. TABLE OF DATA REQUIRED (For all buildings)

STORIES	B	1	2	3					TYPICAL	ROOF
DESIGN LIVE LOAD										
OCCUPANT LOAD										

VII. B. SPECIAL INSPECTOR

STEEL

CONCRETE

OTHER

OTHER

VII. C. FIRE PROTECTION

	Req'd	Prov'd
(1) Fire Suppression System	<input type="checkbox"/>	<input type="checkbox"/>
(2) Fire Alarm	<input type="checkbox"/>	<input type="checkbox"/>
(a) Automatic	<input type="checkbox"/>	<input type="checkbox"/>
(b) Manual	<input type="checkbox"/>	<input type="checkbox"/>
(c) Signal Station	<input type="checkbox"/>	<input type="checkbox"/>
(3) Stand Pipe(s)	<input type="checkbox"/>	<input type="checkbox"/>

VIII. APPEALS

BOARD OF ZONING APPEALS

Variance Req'd	<input type="checkbox"/> YES	<input type="checkbox"/> NO	Granted	<input type="checkbox"/> YES	<input type="checkbox"/> NO	Calendar # _____
----------------	------------------------------	-----------------------------	---------	------------------------------	-----------------------------	------------------

BOARD OF BUILDING APPEALS

Variance Req'd	<input type="checkbox"/> YES	<input type="checkbox"/> NO	Granted	<input type="checkbox"/> YES	<input type="checkbox"/> NO	Docket # _____
----------------	------------------------------	-----------------------------	---------	------------------------------	-----------------------------	----------------

PLAN EXAMINERS SIGNATURE SHEET

I have examined the data furnished by the applicant and same is approved.

RECEIVED _____

DATE

BY _____

PLAN EXAMINER

Address and/or Room No.

COMMENTS

SIGNATURE/DATE

Zoning _____

Landmark Commission - Rm. 519 _____

City Planning - Rm. 501 _____

Examiner of Plans _____

Structural _____

Plumbing _____

HVAC _____

Electrical _____

Division of Fire - 1645 Superior Ave. _____

Div. of Eng. & Construction - Rm. 518 _____

Department of Health - 75 Erieview Plaza _____

Division of Water - 1201 Lakeside Ave. _____

Water Pollution Control - 12302 Kirby Ave. _____

Division of Traffic - Rm. 518 _____

Bureau of Sidewalks - Rm. 518 _____

Division of Streets - Rm. 25 _____

Division of Air Quality - 75 Erieview Plaza _____

Housing Records - Rm. 517 office/warehouse

Fire Damage/Condemnation _____

OTHER _____

Signature 12/23/09
G. Baker X 4010
Signature 12-23-09

Approved _____

CHIEF BUILDING OFFICIAL

Per _____

Date _____ 20

ENGINEERING SITE DESCRIPTION

DJB

IX. LOCATION AND DESCRIPTION OF LOT
ROOM 518

- ADDRESS VERIFICATION REQUIRED
- LOT DESCRIPTION/VERIFICATION REQUIRED

Project Address 10101 WOODLAND AVE., S.E. Sub Lot No. WOODHILL RD.
 Permanent Parcel No. 126-12-002 AKA _____ Side of Street NORTH
 Between EAST 93RD Street or Ave., and WOODHILL RD. Street or Ave.
 Being 130.08 Feet Front and 440.59 Feet Deep on the EAST Side
 Being 177 ± Feet Rear and IRREGULAR Feet Deep on the WEST Side

See Setback Below Change Grade of Hillside Consolidation/Split Req. Appr. Map No. _____

X. ZONING ORDINANCE

Sanborn Map Vol. _____ Page _____ Zoning Map Sht. _____ Zoning Use _____ Area _____ Height _____
 Proposed Use _____ Lot Area _____
 Accessory Use _____ Floor Area _____

YARDS	Front	Rear	Side	Side
Required	_____	_____	_____	_____
Provided	_____	_____	_____	_____

LANDSCAPING	Front	Rear	Side	Side
Required	_____	_____	_____	_____
Provided	_____	_____	_____	_____

Off Street Parking Provided _____ Credit _____ Required _____
 Central Business District Yes _____ No _____

XI. OVERLAY DISTRICTS

	REQUIRED		GRANTED	
	YES	NO	YES	NO
Landmarks approval	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning Commission approval	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CALCULATIONS

NOTES AND COMMENTS

PERMIT APPLICATION REVIEWED BY: _____ ADDRESS CHECKED? YES _____ NO _____ VIOLATIONS CHECKED? YES _____ NO _____ VIOLATIONS ATTACHED? YES _____ NO _____

Exhibit 4: Inspection Report



CLEVELAND DIVISION OF AIR QUALITY

ASBESTOS DEMOLITION & RENOVATION FIELD DATA & INSPECTION CHECKLIST



REVISED: 11/07/2003

I. Preliminary Observations and Data (all inspections)

CL Number [10-108]

Site Name: [Victorreen] Inspector: [Bryan Sokolowski + Mike Samec]
 Location: [10101 Woodland Avenue] District: [B]
 [Cleveland, Ohio 44104] Date: [1-27-2010]
 [] Time in/out: [11:05 am] / [12:45 pm]

Notification Compliance: In Compliance [] or, Violations Suspected []
 Substantive Compliance: In Compliance [] or, Violations Suspected []

Operator Name: [Steven Hyland] I.D. Number: [1575128]

Inspection Type: [] NESHAP [] State [] Local [] AHERA

1. Reason for Inspection [Complaint] Displayed I.D.: Yes [] No []
 Entry Hindered: Yes [] No []

2. Entry Notations (Name and Position of person met onsite; means of access)
 [Steven Hyland, Owner] Phone [614-579-5566]
 [] Phone []

3. Facility Description (Setup & Conditions Observed) [Some buildings] Describe facility and outside indications of
 [demol (# 56,2)] demolition, renovation, or asbestos removal
 [] activity.

4. Suspected Problems; Sample & Photos taken: [Yes] Take adequate samples and photos of demolition
 [ACM not completely removed prior to demolition] material including plaster, drywall, ceiling tile,
 [] thermal insulation, acoustical, friable material, etc.

5. Potential for Nuisance? [Yes] Building occupancy, public access, etc.

6. Note Any Notification Discrepancies: [Demo and asbestos removal dates were]
 [exceeded]

7. Activity Description:
 a. Is there more than one project at this facility? Yes [] No [] N/A []

b. Project Type: [] Demolition/Salvage [] Renovation [] Emergency D/R

c. Describe the project and current phase: [] Inactive [] In progress [] Part II attached

d. Describe the type of abatement: [removal incomplete] Renovation includes removal, dislodging, cutting,
 [pipe insulation, brick walls, and floor tile, window] drilling, or otherwise disturbing RACM in excess of
 [cracking] 260 lf, 160 sf, or 1 cubic meter.

8. Type of ACM [Square feet (sf) Linear feet (lf)] removed, dislodged, cut, drilled, or disturbed.
 [4000] lf Pipe lagging [] lf Sprayed-on [] sf Block
 [] sf Ceiling tile [] sf Troweled-on [] sf Plaster
 [65,800] sf Floor Tile [] sf Roofing [] sf Mastic
 [] sf Drywall [] sf AC Cement [] cubic feet
 [2,500] sf Insulation [] [] []

Method of Measurement: [Notification + survey]

Other Information: []
 []

II. Substantive Compliance Demonstration

Complete Part II for all inspections where it is possible to evaluate substantive compliance
(Marking a shaded response indicates a possible violation)

1. Has all RACM been removed before demolition, renovation, or other activity that may disturb asbestos or preclude access to it begins? Yes No N/A

[Transite panels were left in place, and brought
down with the building, pipe insulation, and window
caulking in poor condition
]

2. During Stripping:

- a. Is water or wetting agent available? Yes No N/A

b. What equipment is in use for wetting? [hose]
[]
[]

- c. Is water being sprayed during stripping? Yes No N/A

- d. Is there visible dust observed in the vicinity of RACM being removed, dislodged, cut, drilled, or otherwise disturbed? Yes No N/A

- e. Examining a cross-section of some removed ACM, does the full depth appear adequately wet? Yes No N/A

- f. Does the material change when it is wet (i.e. color, texture, weight) Yes No N/A

Explain: []
[]
[]
[]

- g. Was material wetting demonstrated or discussed with the operator or supervisor? Yes No N/A
(Whenever possible, demonstrate wetting and the physics)

h. Do any of the following factors apply?

Director's authorized dry removal or daily temperature log with 3 recorded temperatures per day are required when wetting is suspended. Also, operator must remove in units or sections and use local exhaust ventilation and collection with a HEPA unit. Material from emergency demolition and material encased in concrete must be adequately wetted as exposed. Violations only apply when dry materials are present and a no response is made.

- Temp. below 32 °F at point of stripping . Yes No N/A

- Director authorized dry removal Yes No N/A

- Material encased in concrete or similar Yes No N/A

- Building in imminent danger of collapse Yes No N/A

- Records for above are available onsite Yes No N/A

↓
portions of building are prone to collapse

- i. Is a person trained in the NESHAP regulation as described at 40 CFR 61.145(c)(10) available during stripping or removal? Yes No N/A

3. Removal method in use and comments: [Building was being demolished with heavy machinery water was not in use during demo]
[]
[]
[]
[]

II. Substantive Compliance Demonstration (continued)

4. After stripping, during collection or disposal:

- a. Is stripped ACM awaiting containerization adequately wet
Through the full depth? Yes No N/A
- b. Is stripped material allowed to drop? Yes No N/A
How far? [_____]
- c. Is material further damaged by dropping? Yes No N/A
- d. Does dropping result in dust or fine particulate? Yes No N/A
Describe [transite panel skulls, as does pipe]
[insulation]
[_____]
- e. Evaluating waste in bags, is the waste material heavy and
adequately wet throughout? Yes No N/A
- f. Are fiberboard drums lined with plastic? Yes No N/A
- g. Are there open or ripped containers? Yes No N/A
- h. Stripped waste is transported from a height above ground of ...
[N/A] Less than 50'
[N/A] More than 50'

If less than 50', is waste ACM carefully lowered to ground level, not dropping or throwing, sliding or otherwise increasing damage to the RACM materials?

Yes No N/A

If more than 50', is waste ACM transported in dust-tight chutes or leak-tight containers?

Yes No N/A

5. Waste Handling:

- a. Are there visible emissions to the outside air? Yes No N/A
Describe [Improper containment + removal method]
[_____]
[_____]
- b. Is there any suspect ACM on the ground? Yes No N/A
- c. Describe the waste handling method: [NESTAP guidelines]
[were not followed]
[_____]
- d. Describe waste containers in use: [40 yard dumpsters]
[_____]
[_____]
- e. Waste containers are marked with:
 - (1) Generator name and location? Yes No N/A
 - (2) Hazard warning? Yes No N/A
 - (3) DOT Waste Classification? Yes No N/A

II. Substantive Compliance Demonstration
(continued)

f. During load-out and waste disposal, is the vehicle marked with 14" x 21" hazard warning signs? Yes No N/A

g. Is the waste secured in a manner that prevents any visible emissions, load loss and spills or leakage of liquids? Yes No N/A

6. General Safety Evaluation

a. Is work area under containment?
 Full Critical Barriers
 Glove Bag None

b. Is regulated area clearly marked? Yes No N/A

c. Estimated size of containment area: [160,000 SF²]
 []

d. Are general ventilation machines in use (number [])? . Yes No N/A

e. Is negative pressure apparent with positive air flow from clean room into work area? Yes No N/A

f. Are there uncontrolled openings in containment? Yes No N/A

g. Is respiratory protection in use by the operator? Yes No N/A
 Was respirator used by inspector? Yes No N/A

h. Is air quality being monitored? Yes No N/A

i. Are decontamination facilities available? Yes No N/A

j. Is decon suitable for inspector's use (air flow and visibly clean)? . Yes No N/A

k. Decontamination method used by inspector: (check one below)
 Double Suit Shower HEPA Vac. None

Other: []
 []
 []

l. Electrical lock-out in use? (check lighting, ventilation, tools) Yes No N/A

m. Miscellaneous hazards:

High work area temperature? Yes No N/A

Confined space? Yes No N/A

Ignition sources? Yes No N/A

Trip & Fall hazard? Yes No N/A

Scaffolds rails? Yes No N/A

Foot hazards? Yes No N/A

Organic vapors? Yes No N/A

MSDS available for chemicals on site? Yes No N/A

n. Has the inspector been unsafely exposed to hazardous materials?
 (if yes, file report) Yes No N/A

III. Post Inspection Interview Notes:

List persons involved and nature of statements. Also note who controls this facility, including responsibility of other contractors, consultants, etc.

- [See Survey]
- [Mike Same, Bryan Sokolowski, and Steve Hyland were present]
- [for the inspection]
- []
- []
- []
- []
- []

Sketch (optional)

Scale: 1 block = [] or not to scale []

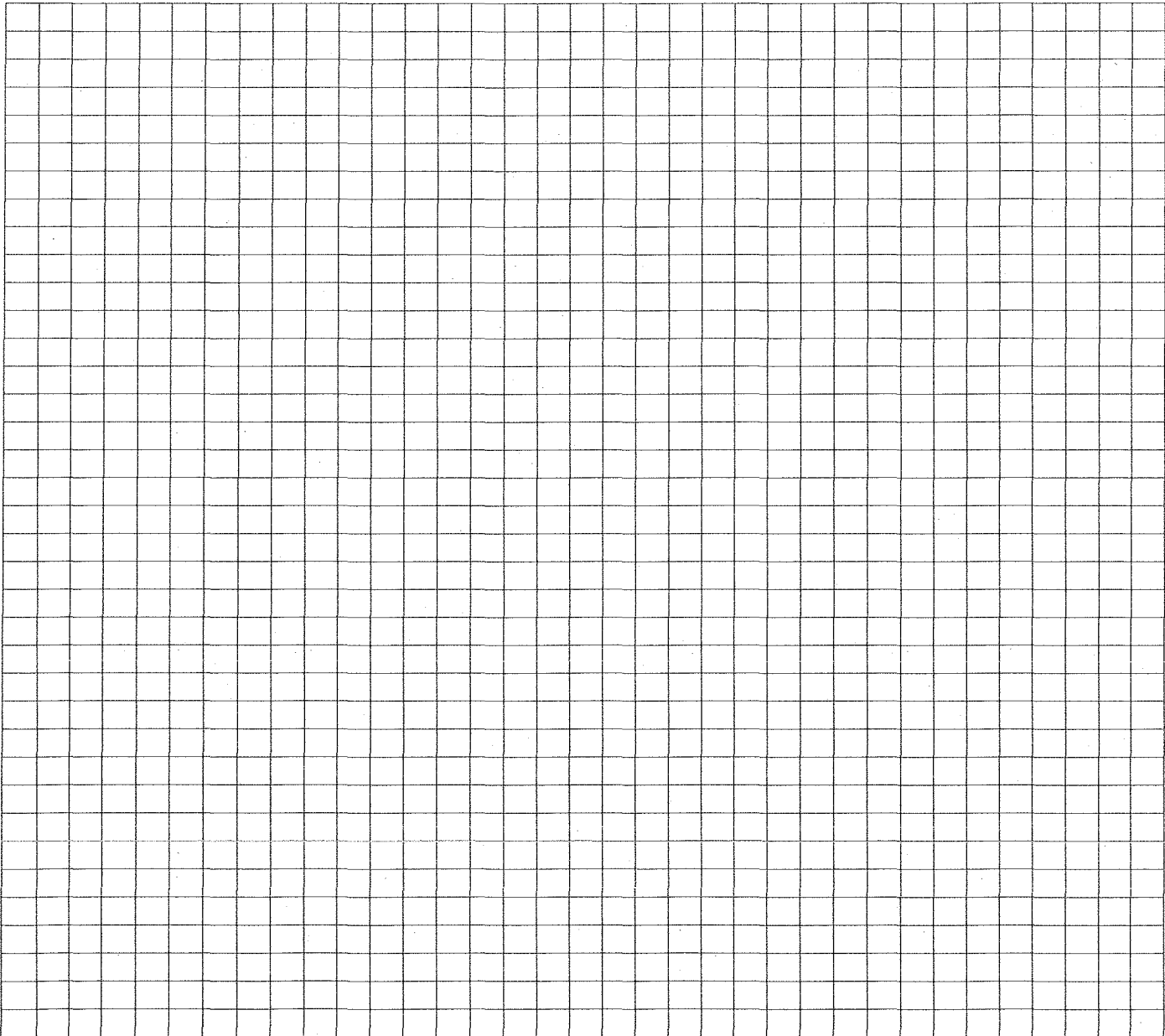


Exhibit 5: Asbestos Sample and Location Report



ANALYTICAL REQUEST FORM

REGULAR Status

ALS Laboratory Group
ANALYTICAL CHEMISTRY & TESTING SERVICES

Environmental Division

RUSH Status Required - ADDITIONAL CHARGE

RESULTS REQUIRED BY _____ DATE _____

CONTACT ALS LABORATORY GROUP PRIOR TO SENDING SAMPLES

Date 2/3/10 Purchase Order No. 78169 Billing Address (if different) _____

Company Name Cleveland Division of Air Quality

Address 75 Erieview Plaza Suite 200

Cleveland OH 44114

City State Zip

Person to Contact Mike Samec Quote No. _____

Email Address msamec@cityofcleveland.oh.us Sampling Site 10101 Euclid Ave

Telephone (216) 420-7682 Date/Time of Collection 1/28/10

Fax Telephone (216) 420-8047

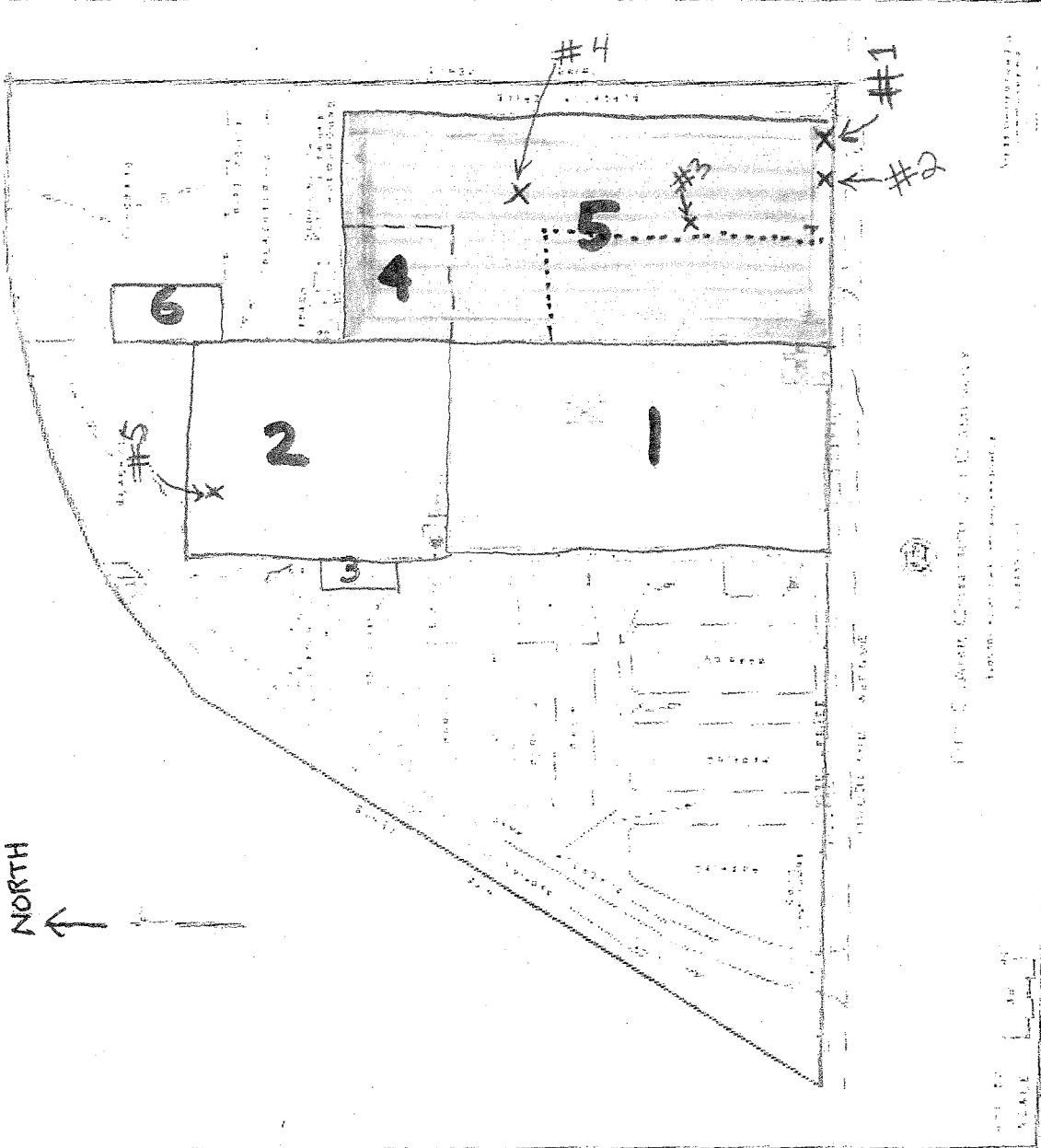
Laboratory Use Only	Client Sample Number	Media Type	Sample Volume (Liters)	ANALYSES REQUESTED - Use Method Number if Known
	01			Bulk ACM sample
	02			↓
	03			
	04			
	05			

CHAIN OF CUSTODY

Relinquished by: (Signature) <u>Michael Samec</u>	Date / Time <u>2/3/10</u>	Received by: (Signature)	Date / Time
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Date / Time

SITE DRAWING A

VICTOREEN BUILDING
10101 WOODLAND AVE., CLEVELAND, OHIO



- #1 - Pipe Insulation
- #2 - Window Caulking
- #3 - Transite
- #4 - Unknown white material
- #5 - Pipe Insulation






VICTORENE BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO

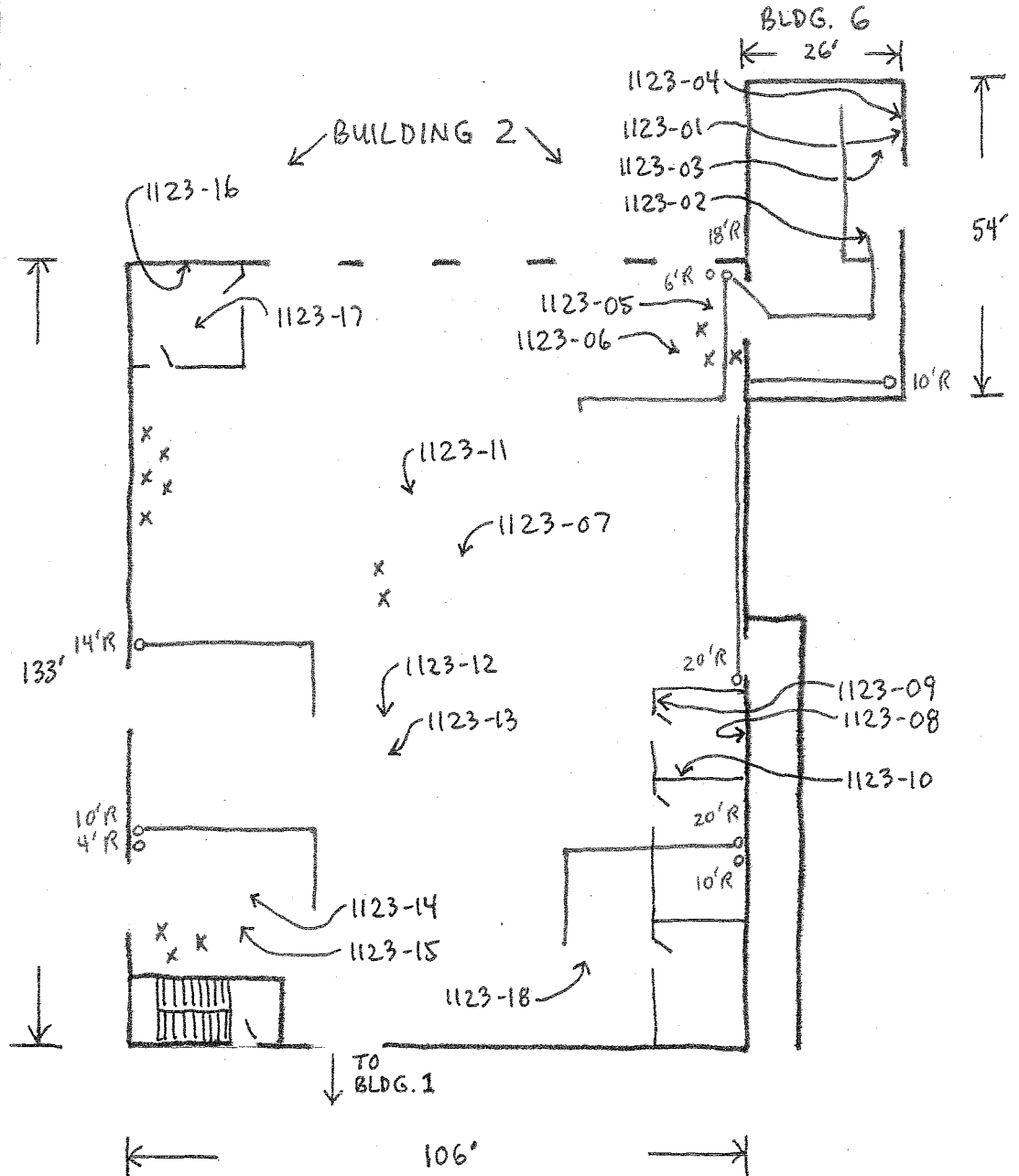
ASBESTOS INSPECTION REPORT

BUILDING #2
AND
BUILDING #6
GROUND FLOOR

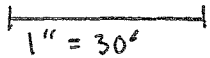
NORTH



LEGEND	
1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces



SCALE:

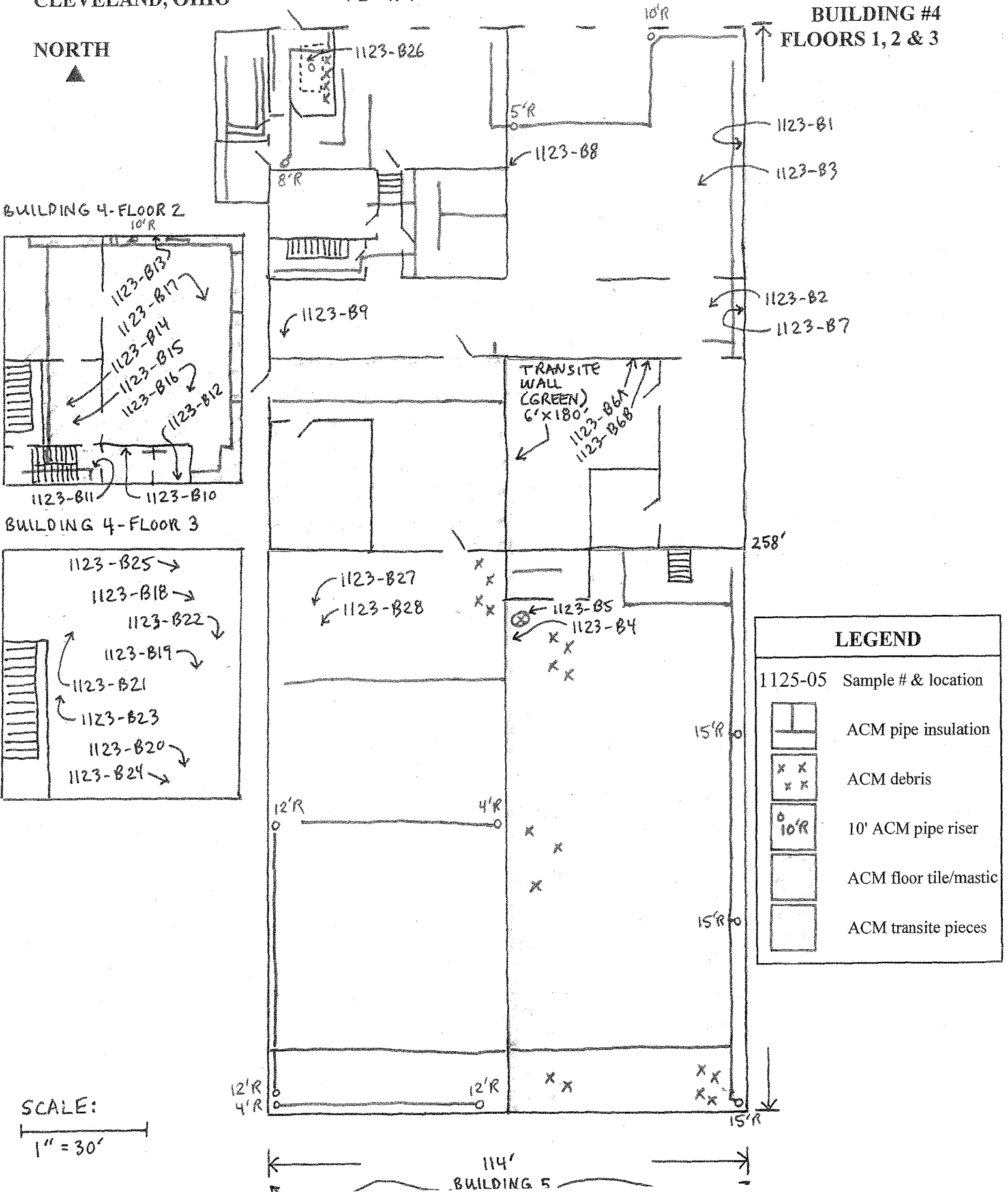


VICTORENE BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO

ASBESTOS INSPECTION REPORT

BUILDING #5
GROUND FLOOR
AND
BUILDING #4
FLOORS 1, 2 & 3

NORTH



LEGEND

1125-05	Sample # & location
	ACM pipe insulation
	ACM debris
	10' ACM pipe riser
	ACM floor tile/mastic
	ACM transite pieces

SCALE:
1" = 30'

114'
BUILDING 5

Exhibit 6: Faxed Letter from JJK Environmental Developmental LLC

JJK ENVIRONMENTAL & DEVELOPMENTAL LLC

Date: FEB. 10, 2010

ATT: Mike Samec

On Dec. the 23 2009 Harper industrial co. put in a notification in with my name as the asbestos Contractor to do work .They never got with me to do any work.-They said they was trying to get some finances to pay to do removal. This was located at 10101 woodland ave. Cleveland ohio .

Then I received a letter from epa. that's its OK for removal on a different address as well. Its 2000 w. 14th st. Cleveland ohio that I have no knowledge of. I'm writing this letter to inform you that I did not do any work on neither one of these addresses 10101 woodland ave Cleveland ohio and 2000 w. 14th st. Cleveland ohio.



Jeffrey Kellogg

JJK ENVIRONMENTAL & DEVELOPMENT LLC.

Phone # 216-240-4114

Exhibit 7: March 1, 2010, Scope of Work

ASBESTOS HAZARD ABATEMENT PROJECT AGREEMENT AND SCOPE OF WORK

PROJECT LOCATION:

**VICTOREEN BUILDING
10101 WOODLAND AVE.
CLEVELAND, OHIO 44104**

ABATEMENT CONTRACTOR:

**TEAM ENVIRONMENTAL
1252 E. 55TH ST.
CLEVELAND, OHIO 44103**

OWNER:

**HARPER INDUSTRIES, INC.
4579 POTH RD.
COLUMBUS, OH 43213**

PREPARED BY:

**JP CONSULTING
190 CORUNNA AVE.
FAIRLAWN, OH 44333**

DATE PREPARED:

MARCH 1, 2010

ASBESTOS HAZARD ABATEMENT PROJECT AGREEMENT AND SCOPE OF WORK

This AGREEMENT is required by the Ohio Department of Health for any project that an abatement contractor performs for a client or building owner. The AGREEMENT must be in writing and must be signed by both parties, and a copy shall be available at the jobsite for review at the request of an authorized regulatory agency inspector.

This AGREEMENT for asbestos hazard abatement as herein described (the "project") is made as of the 1st day of March in the year 2010 by and between:

Team Environmental, 1252 E. 55th St., Cleveland, Ohio 44103
 (Contractor) (Mailing Address)
 Represented by: Ron McConnell 216-780-9958
 (Print Name) Phone

and

Harper Industries, Inc., 4579 Poth Rd., Columbus, Ohio 43213
 (Owner) (Mailing Address)
 Represented by: Steve Hyland 614-579-5566
 (Print Name) Phone

The following documents are part of this agreement, and their terms shall be fully binding upon the parties hereto:

1. Scope of Work
2. Drawing A & Aerial Photograph
3. Submittals (see Article 5)

The Contractor and the Owner agree as follows:

Article 1 - Scope of Work Summary

The Contractor shall furnish all materials and perform all of the work described in the document entitled "SCOPE OF WORK". Contractor represents that he is qualified to perform all such work and that such work will be performed within the limits and in accordance with the highest accepted standards of the respective trades. Contractor represents that he is experienced and skilled in asbestos hazard abatement projects and is familiar with all applicable laws, regulations and guidelines pertaining to the abatement and disposal of asbestos-containing materials as are applicable to this project and this work.

The scope of work of this project includes the following abatement procedures to be performed in the building at 10101 Woodland Ave., Cleveland, Ohio:

LOCATION	QUANTITY/MATERIAL	ABATEMENT METHODS
scattered locations (see DRAWING A and Scope of Work)	Remove asbestos-contaminated debris, friable window glazing, remove asbestos pipe insulation on floors 1-5 of the 5 story building	gross removal of friable and non-friable debris; glovebag of pipe insulation

A detailed description of the work to be performed is contained in the attached **SCOPE OF WORK**. The work procedures will be defined by this Project Agreement and will be monitored part-time by the Project Designer.

Article 2 - Time of Completion

Project will begin on or after Monday March 1, 2010, and will be completed within 15 workdays. Work hours are at the discretion of the Owner, and will be Monday-Friday, 7:30 AM to 4:30 PM only, unless other hours are approved by the Owner. Contractor will establish the entire site as a regulated work area. Contractor shall maintain all poly barrier walls and all critical barriers and barrier tape that were used to define the regulated area until the regulated work area has passed the visual inspection of the Consultant. Contractor will be responsible to contact a Harper Industries representative should any problems or questions arise during the course of the project. Contractor will return to the site for work shifts on all weekdays until all required work has been completed. Contractor will have full use and control of the site in order to complete the work.

Article 3 - Statement of ODH Certification

All persons working on this project will be licensed or certified by the Ohio Department of Health (ODH) in accordance with all laws and regulations as promulgated by ODH. Contractor who removes and disposes of the asbestos materials shall be licensed as an Asbestos Hazard Abatement Contractor. Contractor's supervisor shall be certified as an Asbestos Hazard Abatement Specialist. Contractor's workers shall be certified as Asbestos Hazard Abatement Workers. Project Designer shall be certified as an Asbestos Hazard Abatement Project Designer.

There will be no final clearance air samples to be collected at the conclusion of this asbestos abatement project.

After the Contractor has completed all required asbestos abatement and cleaned and decontaminated the work area thoroughly, the Contractor shall notify the Consultant to arrange for a Final Visual Inspection to be completed in the regulated work area. Consultant's inspector shall be certified as an Asbestos Hazard Evaluation Specialist by ODH. If the Consultant finds that any of the abatement activities were not completed, or were insufficient, the Contractor shall complete such work to the satisfaction of the inspector. When the work area has passed the inspector's Final Visual Inspection, the Consultant shall issue a Certificate of Final Visual Inspection, which will be signed by the Contractor and that Consultant. The Owner is not obligated to pay the Contractor until the Contractor submits the signed Certificate of Final Visual Inspection.

Article 4 - Indemnification

Contractor shall indemnify, hold harmless and defend Owner from and against any and all claims, losses, and damages, including expenses of suit and reasonable attorney's fees arising out of or in any manner connected with or related to Contractor's performance of this agreement, including but not limited to: personal injuries (including disease and death), and property loss or damage, except if such injury, loss or damage shall have been caused by the sole negligence or willful misconduct of the Owner, its agents, employees, or representatives.

Article 5 - Submittals

Contractor shall provide the **Consultant** with the following submittals prior to the start date of the project, unless otherwise noted. Contractor's pay request will not be processed until all documents are in the **Consultant's** possession. **Consultant** will prepare a complete documentation package for the project, to be transmitted to the Owner as a permanent record of the project:

1. Copy of valid Contractor's license (ODH)
2. Copy of notifications to EPA and ODH
3. Copy of valid supervisor's and worker's medical records and ODH license
4. Copy of signed Asbestos Hazard Abatement Project Agreement/Scope of Work
5. Copy of valid Certificate of Insurance which includes a minimum of \$1,000,000 of asbestos liability insurance, and which names the Owner as additionally insured
6. Copy of valid Worker's Compensation Certificate
7. Completed Waste Shipment Record to document that waste materials were taken to an EPA-approved asbestos disposal landfill (within 3 weeks of project end).

Project shall not begin until **ASBESTOS HAZARD ABATEMENT PROJECT AGREEMENT** has been signed and dated by both the Owner and the Contractor. Signatures by both parties shall constitute a valid agreement and Notice-to-Proceed.

CONTRACTOR: Team Environmental DATE: February 22 2010

SIGNATURE: [Signature] TITLE: CEO

OWNER: Harper Industries, Inc DATE: _____

SIGNATURE: _____ TITLE: _____

CONSULTANT/PROJECT DESIGNER: James Prarat
James Prarat
JP Consulting
190 Corunna Ave., Fairlawn, Ohio 44333
Cell 330-328-7817
Ohio Certified Project Designer #60117

SCOPE OF WORK

PAGE 1 OF 5

VICTOREEN BUILDING AT
10101 WOODLAND AVE.
Cleveland, Ohio

Contractor is responsible to abate the quantities and locations of ACM as defined by these contract documents. The quantities and locations of ACM that are described in this Scope of Work are approximate. A prior 10-day notification to ODH and EPA is required. Both EPA and ODH have waived the 10 day waiting period. Contractor will be provided full access to, and control of the work area during the asbestos abatement project, and will be responsible for maintaining adequate security at the worksite to ensure that only authorized persons may enter the abatement work area during the workday, and that the work area is secured during off-hours using warning signs and barrier tape. Contractor will provide the independent third party consulting/testing firm (JP Consulting) with the following submittals prior to the start of the project: Contractor's ODH license; training, medical, and fit test records for the Supervisor and all workers; ODH Notification; Worker's Comp Certificate; Certificate of Asbestos Liability Insurance for a minimum of \$1,000,000; MSDS's for any solvents or chemicals used at the site; and Waste Shipment Records indicative of proper asbestos disposal (within 3 weeks).

Pre-Abatement Procedures:

Refer to the attached **Drawing A** for the project location. Refer to the attached **AERIAL PHOTOGRAPH** to show the locations of the building components at 10101 Woodland Ave. with respect to surrounding structures and with the road. Contractor shall construct a regulated work area. All visible traces of the asbestos containing and asbestos-contaminated materials that are assigned for removal shall be removed by the abatement contractor. Contractor shall be responsible to supply the electricity (portable generators) that is needed for the abatement. Electric power will NOT be available at the site. Owner will make arrangements for water to be available from a hydrant on Woodland Ave. Contractor will maintain the work area as a Regulated Area, using OSHA-required warning signs and barrier tape. Contractor shall establish work area barriers with OSHA asbestos warning signs at all potential entranceways. Contractor is responsible to limit access to the Regulated Area to authorized personnel only. The Owner is responsible to establish and maintain the perimeter security of the entire site. Contractor shall inform the Owner immediately if a breach of the perimeter security occurs or has occurred while the Contractor was off-site.

No AFD's or negative pressure enclosures will be required for this abatement project. Some asbestos pipe insulation throughout the site will be required to be removed using the glovebag procedure. Contractor shall have a water hose, a pump sprayer, a HEPA vacuum, and a gas-powered generator onsite at all times for the glovebagging work, and during the abatement project in general. Contractor shall provide water-proof, portable heavy-duty light sources as needed.

Contractor's workers shall wear full-body disposable coveralls, and will wear a half-face APR's at all times while performing asbestos abatement inside the regulated area. Contractor will comply with all OSHA safety requirements, including those contained in the Asbestos Construction Standard, 29 CFR 1926.1101.

Contractor shall ensure that all electrically-powered equipment be connected to a GFCL. Contractor shall supply a sufficient number of generators as needed to conduct the necessary work.

Contractor shall be responsible to find and collect all PCB-containing light ballasts, and all fluorescent light tubes, that exist on the site, and have all such materials disposed of by a company that specializes in recycling such materials. Contractor shall procure a waste disposal manifest to verify the appropriate disposal of these materials, and shall provide a signed copy of that manifest to the Owner.

Owner shall be responsible for the disposal of any drums or containers of unidentified liquid waste on the site.

SCOPE OF WORK

PAGE 2 OF 5

VICTOREEN BUILDING AT
10101 WOODLAND AVE.
Cleveland, Ohio

Abatement Procedures:

Contractor shall comply with all requirements of the EPA's NESHAP regulation. Contractor will keep the asbestos-containing materials **adequately wet**, using amended water, throughout the glovebag removal or gross removal abatement process, and will prevent any **visible emissions** inside of the regulated work area during the abatement process. Contractor shall take all properly containerized ACM waste materials to an EPA-approved asbestos landfill for disposal. After all required asbestos abatement and decontamination work has been completed and all surfaces within the regulated work area have been thoroughly cleaned, Contractor shall proceed to spray any abated surfaces with a lockdown encapsulant. Following the encapsulation procedure, Contractor shall remove all equipment, and any poly coverings from walls and floors. Contractor's Supervisor shall then notify the Consultant that the work area is ready for the Consultant's Final Visual Inspection. After the work area passes the Consultant's visual inspection, all Contractor's personnel may leave the site.

Refer to **DRAWING A**. The project includes the removal of the following asbestos containing or asbestos-contaminated materials:

NORTHWEST AREA - approx. 14,000 SF (**yellow highlighted area on DRAWING A**).

- ◆ **does not include** any abatement in either the **boiler room** that is underneath the southwest part of this area, or in the **basement** that is under the remainder of this area.
- ◆ any of the remaining structure that has not yet been demolished, plus any large pieces of demolition debris (>1 cubic yard) that have clearly not yet been mixed with potentially contaminated debris, shall be spray-washed and decontaminated of any suspect ACM debris, then can be disposed of as C&D waste in the C&D dumpster.
- ◆ all demolition debris that is either on the northwest area concrete slab, or is scattered around the perimeter of the northwest area **shall be disposed of as asbestos-containing waste**, and shall be placed in an asbestos waste dumpster. Line each asbestos waste dumpster with an appropriate liner before any asbestos-containing waste is placed in the dumpster. Completely wet the asbestos-contaminated debris before it is placed in the asbestos waste dumpster.
- ◆ for the asbestos waste dumpster that exists to the north of this area: (1) wet that asbestos waste that is in the dumpster, and place that asbestos waste in double 6-mil black asbestos disposal bags; (2) clean and decontaminate the interior of the dumpster; (3) line the asbestos waste dumpster with an appropriate liner, then replace the double-bagged asbestos waste back into the dumpster. Dumpster can then be filled with additional bagged asbestos waste that is generated at this site.

EAST AREA - approx. 30,000 SF (**pink highlighted area on DRAWING A**).

- ◆ where parts of this structure **have not yet been demolished**, locate and abate any of the following asbestos materials that remain in place: transite panels, window caulk or glazing, pipe insulation.
- ◆ dispose of the debris pile that is to the northeast of this area as asbestos-contaminated waste.
- ◆ any of the remaining structure that has not yet been demolished, plus any large pieces of demolition debris (>1 cubic yard) that have clearly not yet been mixed with potentially contaminated debris, shall be spray-washed and decontaminated of any suspect ACM debris, then can be disposed of as C&D waste in the C&D dumpster.
- ◆ all demolition debris that is either in the east area, or is scattered around the perimeter of the east area **shall be disposed of as asbestos-containing waste**, and shall be placed in an asbestos waste dumpster. Line each asbestos waste dumpster with an appropriate liner before any asbestos-containing waste is placed in the dumpster. Completely wet the asbestos-contaminated debris before it is placed in the asbestos waste dumpster.
- ◆ **THIS SCOPE OF WORK REGARDING THE ABATEMENT IN THE NORTHWEST AND EAST AREAS IS SUBJECT TO REVIEW AND REVISION BY THE AUTHORIZED REPRESENTATIVES FROM CLEVELAND AIR POLLUTION CONTROL AND THE OHIO DEPARTMENT OF HEALTH.**

SCOPE OF WORK

PAGE 3 OF 5

VICTOREEN BUILDING AT
10101 WOODLAND AVE.
Cleveland, Ohio

5-STORY BUILDING (FLOORS 1-4) - approx. 82,000 SF.

- ◆ remove all of the estimated 300 LF of asbestos pipe insulation on the first floor
- ◆ remove the estimated 350 LF of asbestos pipe insulation that is within 5 feet of the east wall on floors 2 - 4.
- ◆ the asbestos pipe insulation that is still on the pipes can be removed using glovebagging or by wrapping the insulation/pipe in poly, and cutting out the pipe sections
- ◆ where any damaged asbestos pipe insulation is on the floor on floors 1 through 4, wet the material and bag it immediately in double 6-mil black asbestos disposal bags. HEPA-vacuum and wet wipe the floor.
- ◆ THIS SCOPE OF WORK REGARDING THE ABATEMENT OF ASBESTOS PIPE INSULATION IS SUBJECT TO REVIEW AND REVISION BY THE AUTHORIZED REPRESENTATIVES FROM CLEVELAND AIR POLLUTION CONTROL AND THE OHIO DEPARTMENT OF HEALTH.

Final Visual Inspection:

After the Contractor has completed all required asbestos abatement and cleaned and decontaminated the work area thoroughly, the Contractor shall notify the Consultant to arrange for a Final Visual Inspection to be completed in the regulated work area. If the Consultant finds that any of the abatement activities were not completed, or were insufficient, the Contractor shall complete such work to the satisfaction of the inspector. When the work area has passed the inspector's Final Visual Inspection, the Consultant shall issue a **Certificate of Final Visual Inspection**, which will be signed by the Contractor and the Consultant. The Owner is not obligated to pay the Contractor until the Contractor submits the signed **Certificate of Final Visual Inspection**.

Attachments - **DRAWING A**
- **AERIAL PHOTOGRAPH**

Exhibit 8: March 12, 2010, Notice of Violation



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL: 7009 3410 0002 1933 7915
RETURN RECEIPT REQUESTED**

March 12, 2010

Steven Hyland
Harper Industries, Inc.
4579 Poth Road
Columbus, Ohio 43213

**CL Number: CL 10 108
NOTICE OF VIOLATION: ASBESTOS NESHAP VIOLATION**

Dear Mr. Hyland:

On January 27, 2010, the Cleveland Division of Air Quality (CDAQ) inspected the Victoreen Building located at 10101 Woodland Avenue, in Cleveland. This letter serves as notification that you conducted demolition activities in violation of the National Emission Standard for Hazardous Air Pollutants.

Asbestos removal projects are subject to compliance with the Asbestos National Emission Standard for Hazardous Air Pollutants (NESHAP), Title 40 Code of Federal Regulations (CFR) Part 61 Subpart M, the Ohio Administrative Code (OAC) Rule 3745-20, and the Ohio Revised Code Chapter 3704.05(G).

Harper Industries, Inc. (Harper) violated 40 CFR Part 61.145(b)(4)(xi) and OAC Rule 3745-20-03(A)(4)(k) by failing to describe work practices and engineering controls to be used to comply with the requirements of the this subpart, including asbestos removal and waste-handling emission control procedures. [Observed on January 27, 2010]

Harper violated 40 CFR Part 61.145(c)(1) and OAC Rule 3745-20-04(A)(1) by failing to remove all Regulated Asbestos Containing Material (RACM) from a facility being demolished before any activity begins that would break up, dislodge, or similarly disturb the material or preclude access to the material for subsequent removal. [Observed on January 27, 2010]

Harper violated 40 CFR Part 61.145(c)(3) and OAC Rule 3745-20-04(A)(3) by failing to adequately wet the RACM during the stripping operation. [Observed on January 27, 2010]



Harper violated 40 CFR Part 61.145(c)(6)(i) and OAC Rule 3745-20-04(A)(6)(a) by failing to adequately wet the RACM and ensure that it remains wet until collected and contained or treated in preparation for disposal. [Observed on January 27, 2010]

Harper violated 40 CFR Part 61.150(a)(1)(ii) and OAC Rule 3745-20-05(B)(1)(b) by failing to discharge no visible emissions to the outside air from collection, mixing, wetting, and handling operations. [Observed on January 27, 2010]

Harper violated 40 CFR Part 61.150(a)(1)(iii) and OAC Rule 3745-20-05(B)(1)(c) by failing to seal all asbestos-containing waste material in leak-tight containers while wet. [Observed on January 27, 2010]

Harper violated 40 CFR Part 61.150(a)(1)(iv) for failing to label the containers using warning labels specified by Occupational Safety and Health Administration (OSHA) standards. [Observed on January 27, 2010]

Unless you undertake some type of corrective action with respect to the above noted violations, you will remain in non-compliance. CDAQ requests that Harper submit a corrective action plan to the following enforcement representative:

Mike Samec
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

The corrective action plan must include, but need not be limited to:

- Procedures Harper Industries, Inc. will implement to ensure future demolitions and asbestos removal projects will be performed in compliance with NESHAP rules,
- A detailed scope of work which outlines steps to be taken to correct all violations, and
- Provisions to submit all personal air monitoring data, and to notify CDAQ as to when the final visual clearance will take place.

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.



CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Mike Samec at (216) 420-7682. All correspondence with CDAQ must include the appropriate Ohio EPA CL number: CL 10 108

Sincerely,

A handwritten signature in black ink, appearing to read "George Baker".

George Baker
Chief of Enforcement

GB/BS/MS

cc: Mike J. Krzywicki, CDAQ

John Paulian, Ohio EPA Central Office

Lisa Holscher, U.S. EPA Region V

Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\10101 Woodland\2010-1-27 NOV.doc

Exhibit 9: Response Letter from Harper Industries, Inc. #1

HARPER INDUSTRIES, INC

4579 Poth Rd.
Columbus, Ohio 43213

March 25, 2010

George Baker / Mike Samec
City of Cleveland
Division of Air Quality
CL Number: CL 10 108

Re: 10101 Woodland Ave, Cleveland Ohio

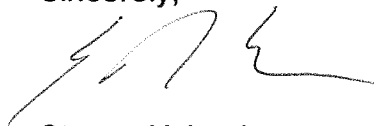
Dear Mr. Baker and Mr. Samec:

This letter is in response to the notice of violation that was sent to my attention dated March 12, 2010. After the many meetings and phone conversations that we have had, I would like to report that Harper Industries, Inc. has indeed hired JP Consulting (Jim Prarat) and Team Environmental (Ron McConnell), to assist in the clean up, and to remedy the Asbestos NESHAP Violations. Harper Industries is doing everything in its power to move the scope of work along as quickly and efficiently as possible. The scope of work has been provided to your office.

Our timeline at this time will be as such: Mobilize completely in force with an excavator and manpower on Monday March 29, 2010. We anticipate it will take three – four weeks from this date to completely remove the debris that was discussed in our meetings, that puts the conclusion of the clean up before April 30th. This deadline however does not reflect any situations that may occur, such as mechanical failure, severe weather, etc.

Harper Industries was taken advantage by a State Licensed, Asbestos Abatement Contractor, but I am confident that we will come through and remedy this situation.

Sincerely,



Steven Hyland

HARPER INDUSTRIES, INC

4579 Poth Rd.
Columbus, Ohio 43213

March 25, 2010

George Baker / Mike Samec
City of Cleveland
Division of Air Quality
CL Number: CL 10 108

Re: 10101 Woodland Ave, Cleveland Ohio

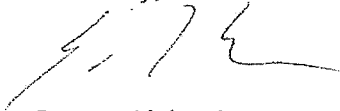
Dear Mr. Baker and Mr. Samec:

This letter is in response to the notice of violation that was sent to my attention dated March 12, 2010. After the many meetings and phone conversations that we have had, I would like to report that Harper Industries, Inc. has indeed hired JP Consulting (Jim Prarat) and Team Environmental (Ron McConnell), to assist in the clean up, and to remedy the Asbestos NESHAP Violations. Harper Industries is doing everything in its power to move the scope of work along as quickly and efficiently as possible. The scope of work has been provided to your office.

Our timeline at this time will be as such: Mobilize completely in force with an excavator and manpower on Monday March 29, 2010. We anticipate it will take three – four weeks from this date to completely remove the debris that was discussed in our meetings, that puts the conclusion of the clean up before April 30th. This deadline however does not reflect any situations that may occur, such as mechanical failure, severe weather, etc.

Harper Industries was taken advantage by a State Licensed, Asbestos Abatement Contractor, but I am confident that we will come through and remedy this situation.

Sincerely,



Steven Hyland

Exhibit 10: Email Response Letter from Steven Hyland of Harper Industries, Inc.
#2

Samec, Michael

From: StevenHyland@aol.com
Sent: Monday, April 12, 2010 5:37 PM
To: Baker, George; Samec, Michael
Cc: jimhyland3@gmail.com; teamenv@msn.com; jprarat@hotmail.com
Subject: [PROBABLY SPAM] 10101 Woodland Ave
Importance: Low
Attachments: EPA Letter.doc

George / Mike

Please find attached letter that George discussed with Jim.

Also, we are aware of the issue with Frank Spurgeon, the previous land owner, and we will engage Team Environmental to locate a sufficient location at the site for him to continue working on his trailer.

We are also aware of the bobcat (skid steer), that was dropped off at the site and now needs returned to United Rental, we will also have Team Environmental handle the washing of that piece of equipment before it is moved.

You will be notified prior to any of these issues being addressed at the site.

Regards,

Steven Hyland
HARPER INDUSTRIES, INC.
4579 Poth Rd
Columbus OH 43213
614-579-5566 cell
stevenhyland@aol.com

HARPER INDUSTRIES, INC

4579 Poth Rd.
Columbus, Ohio 43213

March 25, 2010

George Baker / Mike Samec
City of Cleveland
Division of Air Quality
CL Number: CL 10 108

Re: 10101 Woodland Ave, Cleveland Ohio

Dear Mr. Baker and Mr. Samec:

This letter is in response to the notice of violation that was sent to my attention dated March 12, 2010. After the many meetings and phone conversations that we have had, I would like to report that Harper Industries, Inc. has indeed hired JP Consulting (Jim Prarat) and Team Environmental (Ron McConnell), to assist in the clean up, and to remedy the Asbestos NESHAP Violations. Harper Industries is doing everything in its power to move the scope of work along as quickly and efficiently as possible. The scope of work has been provided to your office.

Our timeline at this time will be as such: Mobilize completely in force with an excavator and manpower on Monday April 26, 2010. We anticipate it will take three – four weeks from this date to completely remove the debris that was discussed in our meetings, that puts the conclusion of the clean up before May 30th. This deadline however does not reflect any situations that may occur, such as mechanical failure, severe weather, etc.

Harper Industries was taken advantage by a State Licensed, Asbestos Abatement Contractor, but I am confident that we will come through and remedy this situation.

Sincerely,

Steven Hyland

Exhibit 11: Scope of Work for the Decontamination of the Skid Steer

**SCOPE OF WORK FOR
THE DECONTAMINATION OF THE SKID STEER AT
10101 WOODLAND AVE., CLEVELAND, OHIO 44104
WEDNESDAY MAY 26, 2010**

1. A REPRESENTATIVE OF THE OWNER OF THE SITE, **HARPER INDUSTRIES (HI)**, WILL UNLOCK THE GATES AT OR BEFORE 9 AM. HI WILL PROVIDE THE KEYS FOR THE SKID STEER TO THE ABATEMENT CONTRACTOR, **HAWK CONSTRUCTION (HC)**. A LICENSED ASBESTOS ABATEMENT WORKER FOR HC WILL MOVE THE SKID STEER OUT OF THE POTENTIALLY CONTAMINATED AREA AND PLACE IT CLOSE TO THE SOUTHEAST GATE NEAR WOODLAND AVE. HC WILL KEEP THE KEYS, THEN TURN THEM OVER TO UNITED RENTALS.
2. PLACE THE SKID STEER ON A 20'X20' DROPCLOTH MADE WITH 2 LAYERS OF 6-MIL POLY. IF ANY LARGE PIECES OF ACM DEBRIS ARE WASHED OFF OF THE SKID STEER, THEY SHALL BE CONTAINED ON THE POLY, AND NOT ALLOWED TO MIX WITH THE SOIL.
3. HC SHALL PROVIDE ONE OR MORE GAS-POWERED GENERATORS TO PROVIDE NEEDED POWER. HC SHALL PROVIDE A HEPA VACUUM, A POWER WASHER, AND ADEQUATE HOSES TO PROCURE WATER FROM A NEIGHBORING PROPERTY.
4. HC WORKERS SHALL WEAR PROPER PERSONAL PROTECTIVE EQUIPMENT WHILE PERFORMING THIS WORK.
5. HC SHALL ESTABLISH A REGULATED WORK AREA USING CAUTION TAPE AND ASBESTOS WARNING SIGNS.
6. WASH THE ENTIRE SKID STEER USING THE POWER WASHER. WET WIPE ANY SURFACES THAT THE POWER WASHER CANNOT, OR SHOULD NOT BE USED ON.
7. REMOVE AND DISPOSE OF THE AIR FILTER ON THE SKID STEER.
8. MOVE THE SKID STEER OFF OF THE POLY DROPCLOTH, AND DISPOSE OF THE POLY, AND ANY DEBRIS ON THE POLY AS ASBESTOS WASTE MATERIAL.
9. ABOUT 1 HOUR BEFORE THIS WORK IS COMPLETED, NOTIFY THE PROJECT DESIGNER JAMES PRARAT (JP CONSULTING, 330-328-7817) THAT THE WORK IS NEAR COMPLETION. THE SKID STEER MUST PASS PRARAT'S VISUAL INSPECTION BEFORE CONTRACTOR'S JOB IS COMPLETE. PRARAT WILL ALSO NOTIFY MIKE SEMAC OF CLEVELAND AIR QUALITY (216-420-7682), WHO MAY ALSO VISUALLY INSPECT THE WORK.
10. WHEN THE WORK PASSES THE VISUAL INSPECTION, A **CERTIFICATE OF VISUAL INSPECTION** WILL BE SIGNED BY PRARAT AND THE HC SUPERVISOR. PRARAT WILL PROVIDE A COPY OF THE CERTIFICATE, AND A PROJECT REPORT TO ALL PARTIES.
11. THE OWNER OF THE SKID STEER (UNITED RENTALS, JOHN CLARK, 216-749-3400) WILL BE NOTIFIED, AND THE SKID STEER WILL BE PICKED UP EITHER LATE ON 5/26 OR EARLY ON 5/27.

PROJECT DESIGNER:


JAMES PRARAT, AHAPD #60117

DATE:

5-24-10

Exhibit 12: June 24, 2010, Second Notice of Violation



City of Cleveland
Frank G. Jackson, Mayor

Department of Public Health
Division of Air Quality
75 Erieview Plaza, Suite 200
Cleveland, Ohio 44114-1839
216/664-2297 • Fax: 216/420-8047
www.clevelandhealth.org

**SERVING OHIO EPA AS AGENCY 13
FOR CUYAHOGA COUNTY**

**CERTIFIED MAIL: 7003 1010 0004 2923 2723
RETURN RECEIPT REQUESTED**

June 24, 2010

Steven Hyland
Harper Industries, Inc.
4579 Poth Road
Columbus, Ohio 43213

**CL Number: CL 10 108
SECOND NOTICE OF VIOLATION: ASBESTOS NESHAP VIOLATION**

Dear Mr. Hyland:

On March 12, 2010, the Cleveland Division of Air Quality (CDAQ) issued a Notice of Violation requesting that Harper Industries, Inc. submit a corrective action plan for remediating violations at 10101 Woodland Avenue, in Cleveland, and for the prevention of future violations.

CDAQ received a response letter on March 25, 2010, along with a revised Notification, and a detailed scope of work. Within this letter, Harper Industries committed to the following: "Mobilize completely in force with an excavator and manpower on Monday March 29, 2010." CDAQ received via e-mail on April 12, 2010, a second response letter dated March 25, 2010. Within this letter, Harper Industries committed to a mobilization start date of April 26, 2010. CDAQ also received a faxed revised notification.

Harper Industries, Inc. has failed to meet commitments made in their corrective action plans; the regulated asbestos containing material at 10101 Woodland Avenue has not been abated.

You are expected to immediately provide an asbestos clean-up start date, to submit revised notifications as necessitated by any changes, to implement asbestos abatement at 10101 Woodland Avenue, to submit all personal air monitoring data, and to notify CDAQ as to when the final visual clearance will take place.

Failure to do so may result in referral to Ohio EPA or U.S. EPA for further enforcement action. Fulfillment of your commitments included in the corrective action plan and/or any modifications contained within this letter does not constitute a waiver of CDAQ's ability to refer this matter to Ohio EPA or U.S. EPA for further enforcement action. Please submit any future correspondence related to this matter



to the following enforcement representative:

Mike Samec
Cleveland Division of Air Quality
75 Erieview Plaza 2nd Floor
Cleveland, Ohio 44114-1839

Your written response to this letter must be received by CDAQ within fourteen (14) days of your receipt of this letter. If there is insufficient time to correct the alleged violations within this timeframe, your response must include a timeline for correcting the alleged violations.

Violations of Ohio air pollution laws and /or permit terms and conditions are subject to the penalties stipulated in Ohio Revised Code Section 3704.99(A), which allows fines of not more than twenty-five thousand dollars or imprisonment for not more than one year, or both, for each violation.

CDAQ issues this letter with Ohio EPA's concurrence. The failure to mention any specific violation does not excuse any violations of local, state and federal laws or regulations regarding air pollution control. Violations of air pollution control laws may be pursued in local court or referred to Ohio EPA or U.S. EPA for further enforcement action. Should you have any questions, please call Mike Samec at 216-420-7682. All correspondence with CDAQ must include the appropriate Ohio EPA CL number for the 10101 Woodland project: CL 10 108.

Sincerely,

Linda Kimmey for G.B.
George Baker
Chief of Enforcement

GB/ms

cc: Michael J. Krzywicki, CDAQ
John Paulian, Ohio EPA Central Office
Lisa Holscher, U.S. EPA Region V
Facility File and L:\Data\Facilities\+ Programs\Asbestos\Sites\10101 Woodland\2010-1-27 2nd NOV.doc

Exhibit 13: 1st Revised Notification (Completion Date 1/15/10)

**OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION**

Operator Project #	Postmark Hand Delivered	Date Received Dec. 9, 2009	Notification # C118108				
I. Type of Notification (check one): <input type="checkbox"/> Original <input checked="" type="checkbox"/> Revised <input type="checkbox"/> Canceled							
II. Facility Description (include building name, number, and floor or room number)							
Building Name: VICTOREEN							
Address: 10101 WOODLAND AVE							
City: CLEVELAND		State: OHIO	Zip Code: 44104 County: CUYAHOGA				
Site Location (specific): 10101 WOODLAND AVE							
Building Size (square feet): 159,672		# of Floors: 5	Age in Years: 90				
Present Use: VACANT		Prior Use: RETAIL SALES					
III. Type of Operation (check one): <input checked="" type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training							
IV. Is Asbestos Present? (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
V. Facility Information							
Owner Name: HARPER INDUSTRIES, INC.							
Address: 4577 POTH RD							
City: COLUMBUS		State: OH	Zip Code: 43213				
Contact: STEVEN HYLAND		Telephone: (614) 579-5566	Fax: (216) 662-6316				
Removal Contractor Name: JJK ENVIRONMENTAL License # AS22076							
Address: 9503 EASTON AVE							
City: CLEVELAND		State: OH	Zip Code: 44104				
Contact: JEFFERY KELLOGG		Telephone: (216) 240-4114	Fax: (216) 938-8776				
Other Operator (demolition/general): HARPER INDUSTRIES, INC License # 1575128 - STATE of OHIO							
Address: 4577 POTH RD							
City: COLUMBUS		State: OH	Zip Code: 43213				
Contact: STEVEN HYLAND		Telephone: (614) 579-5566	Fax: (216) 662-6316				
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II nonfriable ACM:							
Bulk Sampling: TESTING BY IATA							
ANALYSIS METHOD - EPA 600/R-93/116							
Ohio Asbestos Hazard Evaluation Specialist: JIM PRARAT AHES 3073							
Name		Certification #					
VII. Approximate Amount of Asbestos Materials:							
	RACM to be Removed	Nonfriable Asbestos Material to be Removed		Nonfriable Asbestos Material NOT to be Removed			
		Category I	Category II	Category I	Category II		
SEE ATTACHED SURVEY ANALYSIS							
Pipes (linear feet)	4,000						
Surface Area (square feet)	FLOOR TINE	65,800	2,500 TRANSITE				
Facility Components (cubic feet)							
VIII. Scheduled Dates Demolition or Renovation: Start: 12-23-09 Complete: 2-27-2010							
IX. Dates for Asbestos Removal (MM/DD/YY) Start: 12-23-09 Complete: 1-15-2010							
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Hours of Operation:	7-8:30P	7-8:30P	7-8:30P	7-8:30P	7-8:30P		

OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION

X. Description of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components:
Systematic Demolition of STRUCTURE, USING A TRACK BACKHOE W/BUCKET
OTHER EXCAVATION EQUIPMENT

XI. Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: SOME PIPE INSULATION WILL BE GLOVED BAGGED WITH A REGULATED WORK AREA. ALL OTHER ABATEMENT WILL BE GROSS REMOVAL, USING WET METHODS, IN A NEGATIVE PRESSURE ENVIRONMENT

XII. Waste Transporter #1
Name: MINERVA ENTERPRISES
Address: 9000 MINERVA RD PO BOX 709
City: WAYNESBURG State: OH Zip Code: 44688
Contact: STEVE CHAMBER Telephone: (330) 866-3435 Fax: (330) 866-3488
Waste Transporter #2
Name:
Address:
City: State: Zip Code:
Contact: Telephone: () Fax: ()

XIII. Waste Disposal
Name: MINERVA LANDFILL
Address: 9000 MINERVA RD
City: WAYNESBURG State: OH Zip Code: 44688
Contact: STEVE CHAMBER Telephone: (330) 866-3435 Fax: (330) 866-3488

XIV. Emergency Demolition (complete item XIV and all other sections, only if this project is an Emergency Demo.)
1. Attach a copy of the Order to this notice.
2. Name of Authority Issuing Order: Title:
3. Authority of Order (Citation of Code):
4. Date of Order (MM/DD/YY): Date Ordered to Begin:

XV. Emergency Renovation (Attach separate sheet with the following information if project is Emergency Reno.)
1. Date and Hour of the Emergency
2. Description of the Sudden, Unexpected Event
3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden.

XVI. Description of procedures to be followed in the event that unexpected RACM is found or nonfriable ACM becomes crumbled, pulverized or reduced to powder. STOP Demolition Activities, WET DOWN ASBESTOS MATERIAL - COVER W/ POLY - CONTACT AHERS Person

XVII. I certify that an individual trained in the provisions of NESHAPS (40 CFR PART 61, SUBPART M) will be on-site during the Demolition or Renovation and evidence that the required training has been accomplished by this person will be available during normal business hours.
Signature of Owner/Operator: [Signature] Date: 12-7-09 Type or Print Name and Title: STEVEN HYLAND VP

XVIII. I acknowledge the existence of laws prohibiting the submission of false or misleading statements and I certify that facts contained in this notification are true, accurate, and complete.
Signature of Owner/Operator: [Signature] Date: 12-7-09 Type or Print Name and Title: STEVEN HYLAND VP

Original Notification must be mailed or hand delivered at least ten working days (Monday-Friday excluding weekends) before demolition or renovation begins, except emergency demolitions and emergency renovations (see regulation) which must be submitted as soon as possible before operations begin. (Form Revised 11/12/97)

Exhibit 14: 2nd Revised Notification (Completion Date 3/30/10)

This is 2nd ~~notification~~ revised notification not first. MS
8/17/10

OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION

Operator Project #	Postmark	Date Received	Notification #				
I. Type of Notification (check one): <input type="checkbox"/> Original <input checked="" type="checkbox"/> Revised <input type="checkbox"/> Canceled							
II. Facility Description (include building name, number, and floor or room number)							
Building Name: <u>VICTORIA</u>							
Address: <u>10101 WOODLAND AVE</u>							
City: <u>CLEVELAND</u> State: <u>OHIO</u> Zip Code: <u>44104</u> County: <u>CUYAHOGA</u>							
Site Location (specific): _____							
Building Size (square feet): <u>157,671</u> # of Floors: <u>5</u> Age in Years: <u>90</u>							
Present Use: <u>VACANT</u> Prior Use: <u>RETAIL SALES</u>							
III. Type of Operation (check one): <input checked="" type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training							
IV. Is Asbestos Present? (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
V. Facility Information							
Owner Name: <u>HARPER INDUSTRIES, INC.</u>							
Address: <u>4574 POTH RD</u>							
City: <u>COLUMBUS</u> State: <u>OH</u> Zip Code: <u>43213</u>							
Contact: <u>STEVE HYLAND</u> Telephone: <u>(614) 577-5566</u> Fax: <u>(316) 1663-6318</u>							
Removal Contractor Name: <u>TBM ENVIRONMENTAL</u> License # <u>1518</u>							
Address: <u>1353 E. 35th ST.</u>							
City: <u>CLEVELAND</u> State: <u>OH</u> Zip Code: <u>44113</u>							
Contact: <u>BOB McCONNELL</u> Telephone: <u>(316) 1687-8300</u> Fax: <u>(316) 1651-8787</u>							
Other Operator (demolition/general): <u>HARPER INDUSTRIES, INC.</u> License # <u>1575227 (State of Ohio)</u>							
Address: <u>4574 POTH RD</u>							
City: <u>COLUMBUS</u> State: <u>OH</u> Zip Code: <u>43213</u>							
Contact: <u>STEVE HYLAND</u> Telephone: <u>(614) 577-5566</u> Fax: <u>()</u>							
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II nonfriable ACM:							
<u>BULK SAMPLING TESTING BY IATA</u> <u>ANALYSIS METHOD - EPA 600/R-93/116</u>							
Ohio Asbestos Hazard Evaluation Specialist: <u>JIM ARARAT</u> <u>AHES 3073</u>							
Name Certification #							
VII. Approximate Amount of Asbestos Materials:							
	RACM to be Removed	Nonfriable Asbestos Material to be Removed		Nonfriable Asbestos Material NOT to be Removed			
		Category I	Category II	Category I	Category II		
Pipes (linear feet)	<u>4,000</u>		<u>1,000,000</u>				
Surface Area (square feet)	<u>Floor tile</u>	<u>65,500</u>	<u>3,500</u>				
Facility Components (cubic feet)							
VIII. Scheduled Dates Demolition or Renovation: Start: <u>12-28-09</u> Complete: <u>4-30-2010</u>							
IX. Dates for Asbestos Removal (MM/DD/YY) Start: <u>12-23-09</u> Complete: <u>3-30-2010</u>							
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Hours of Operation:	<u>7A-3P</u>	<u>7A-3P</u>	<u>7A-3P</u>	<u>7A-5P</u>	<u>7A-3P</u>		
Complete all enclosed spaces, except demolitions which involve less than 200 linear feet, 160 square feet, or 15 cubic feet of RACM, need not complete spaces XI, XII, XIII, XIV, and XV. Notifications for Emergency Demolition or Emergency Renovation must supply attachments.							

**OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION**

Page 2 of 2

X.	Description of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components: <i>SELECTIVE STRUCTURE DEMOLITION OF EXISTING FACILITY BY MEANS OF WRECKING EQUIPMENT. DEMOLITION OPERATIONS, INCLUDING WASTE HANDLING/LOADING, PERFORMED OVER 90 FEET DEEP EXCAVATION. AIRBORNE ABatement TO BE AS DONE.</i>
XI.	Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: <i>Isolate & demarcate area. remove material as a compliance with each time immediately into properly labeled containers for disposal. minimize as much</i>
XII.	Waste Transporter #1 Name: <u>SHREVE CONSULTING</u> Address: <u>5100 WILSON AVE</u> City: <u>CLEVELAND</u> State: <u>OH</u> Zip Code: <u>44103</u> Contact: <u>DAVID</u> Telephone: <u>(313) 661-2221</u> Fax: <u>(313) 661-2221</u> Waste Transporter #2 Name: _____ Address: _____ City: _____ State: _____ Zip Code: _____ Contact: _____ Telephone: () _____ Fax: () _____
XIII.	Waste Disposal Name: <u>WILSON LANDFILL</u> Address: <u>4000 WILSON AVE</u> City: <u>CLEVELAND</u> State: <u>OH</u> Zip Code: <u>44103</u> Contact: <u>524-2200</u> Telephone: <u>(313) 524-2200</u> Fax: <u>(313) 524-2200</u>
XIV.	Emergency Demolition (complete item XIV and all other sections, only if this project is an Emergency Demo.) 1. Attach a copy of the Order to this notice. 2. Name of Authority Issuing Order: _____ Title: _____ 3. Authority of Order (Citation of Code): _____ 4. Date of Order (MM/DD/YYYY): _____ Date Ordered to Begin: _____
XV.	Emergency Renovation (Attach separate sheet with the following information if project is Emergency Renvo.) 1. Date and Hour of the Emergency 2. Description of the Sudden, Unexpected Event 3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden.
XVI.	Description of procedures to be followed in the event that unexpected RACM is found or nonfriable ACM becomes crumbled, pulverized or reduced to powder. <i>Immediately wet material, place in proper containers, call owner, responsible Agency</i>
XVII.	I certify that an individual trained in the provisions of NESHAPS (48 CFR PART 61, SUBPART M) will be on-site during the Demolition or Renovation and evidence that the required training has been accomplished by this person will be available during normal business hours. Signature of Owner/Operator: <u>[Signature]</u> Date: <u>12-9-09</u> Type or Print Name and Title: <u>STEVEN HYLAND VP</u>
XVIII.	I acknowledge the existence of laws prohibiting the submission of false or misleading statements and I certify that facts contained in this notification are true, accurate, and complete. Signature of Owner/Operator: <u>[Signature]</u> Date: <u>12-9-09</u> Type or Print Name and Title: <u>STEVEN HYLAND VP</u>
Original Notification must be mailed or hand delivered at least ten working days (Monday-Friday excluding weekends) before demolition or renovation begins, except emergency demolitions and emergency renovations (see regulations) which must be submitted as soon as possible before operations begin, but no later than the following work day. (Form Revised 1/5/09)	

Samec, Michael

From: StevenHyland@aol.com
Sent: Thursday, February 25, 2010 11:51 AM
To: Samec, Michael
Cc: Bryan Sokolowski; jprarat@hotmail.com; teamenv@msn.com
Subject: Revised Notification
Attachments: 0224001151.jpg; 0224001151a.jpg; 0224001151b.jpg; downsized_0224001150.jpg; downsized_0224001152.jpg; 10101 Woodland EPA Notice 001.jpg; 10101 Woodland EPA Notice.jpg

Mike,

Attached is the revised notification, also the photos of the completed security issue.

Thanks,

Steve

In a message dated 2/24/2010 8:26:03 A.M. Eastern Standard Time, MSamec@city.cleveland.oh.us writes:

Steve,

You failed to understand that the agreement we had was for you to submit the required items by Monday. I am currently reviewing everything Wednesday morning. Any possible delays or changes I have to be notified immediately. I do not understand where or how this was misunderstood.

After reviewing the information that has been sent to my office. I have not recieved a revised notification and no ACM removal work will begin until that has been recieved by my office. Also, I need you to contact me because there are some questions I have for the Scope of Work.

Thank you.

Mike Samec
Environmental Enforcement Specialist II
Ohio EPA - Agency 13 (Cuyahoga)
Division of Air Quality
75 Erievue Plaza- 2nd Floor| Cleveland, Ohio 44114
(office) 216-420-7682 | (fax) 216-420-8047
MSamec@city.cleveland.oh.us | www.clevelandhealth.org

From: StevenHyland@aol.com [mailto:StevenHyland@aol.com]
Sent: Tuesday, February 23, 2010 9:00 PM
To: Samec, Michael; jprarat@hotmail.com
Cc: teamenv@msn.com
Subject: Re: reports

Mike,

I attached photos of the guys securing the site, it is complete, I will take the remaining photos tomorrow and will send out tomorrow night.

Ron was waiting on us to secure, so we should be able to get our schedule tightened up and over to you.

I have also attached the scope of work that Jim Prarat has prepared.

In a message dated 2/23/2010 12:01:44 P.M. Eastern Standard Time, MSamec@city.cleveland.oh.us writes:

Steve,

I need a detailed report and a scope of work we agreed to during our meeting on February 18, 2010. It is already Tuesday, February 23, 2010, and I have no information on what work will be done. Until I have something in writing you are not allowed to do any removal work until a detailed report has been submitted to my office.

If you have any questions feel free to contact me.

Thank you.

Mike Samec
Environmental Enforcement Specialist II
Ohio EPA - Agency 13 (Cuyahoga)
Division of Air Quality
75 Erieview Plaza- 2nd Floor| Cleveland, Ohio 44114
(office) 216-420-7682 | (fax) 216-420-8047
MSamec@city.cleveland.oh.us | www.clevelandhealth.org

Exhibit 15: 3rd Revised Notification (Completion Date 6/30/10)

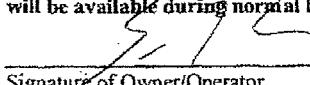
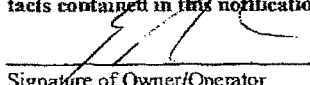
This is 3rd revised notification
not 2nd revised. (ms)

OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION

8/17/10

Operator Project #	Postmark	Date Received	Notification #				
I. Type of Notification (check one): <input type="checkbox"/> Original <input checked="" type="checkbox"/> Revised <input type="checkbox"/> Canceled							
II. Facility Description (include building name, number, and floor or room number)							
Building Name: <u>VICTOREEN</u>							
Address: <u>10101 WOODLAND AVE</u>							
City: <u>CLEVELAND</u>		State: <u>OHIO</u>	Zip Code: <u>44104</u> County: <u>CUYAHOGA</u>				
Site Location (specific): _____							
Building Size (square feet): <u>159,672</u>		# of Floors: <u>5</u>	Age in Years: <u>90</u>				
Present Use: <u>VACANT</u>		Prior Use: <u>RETAIL SALES</u>					
III. Type of Operation (check one): <input checked="" type="checkbox"/> Demo <input type="checkbox"/> Ordered Demo <input type="checkbox"/> Renovation <input type="checkbox"/> Emergency Renovation <input type="checkbox"/> Fire Training							
IV. Is Asbestos Present? (check one): <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
V. Facility Information							
Owner Name: <u>HARPER INDUSTRIES, INC</u>							
Address: <u>4579 POTH RD</u>							
City: <u>COLUMBUS</u>		State: <u>OH</u>	Zip Code: <u>43213</u>				
Contact: <u>STEVE HYLAND</u>		Telephone: <u>(614) 579-5566</u>	Fax: <u>(614) 662-6316</u>				
Removal Contractor Name: <u>TEAM ENVIRONMENTAL</u> License # <u>1518</u>							
Address: <u>1252 E. 55TH ST.</u>							
City: <u>CLEVELAND</u>		State: <u>OH</u>	Zip Code: <u>44103</u>				
Contact: <u>RON MCCONNELL</u>		Telephone: <u>(216) 687-8300</u>	Fax: <u>(216) 651-8787</u>				
Other Operator (demolition/general): <u>HARPER INDUSTRIES, INC</u> License # <u>1575123 (STATE OF OHIO)</u>							
Address: <u>4579 POTH RD</u>							
City: <u>COLUMBUS</u>		State: <u>OH</u>	Zip Code: <u>43213</u>				
Contact: <u>STEVE HYLAND</u>		Telephone: <u>(614) 579-5566</u>	Fax: <u>()</u>				
VI. Procedure, including analytical methods, employed to detect the presence of and to estimate the quantity of RACM and Category I and Category II nonfriable ACM:							
<u>BULK SAMPLING TESTING BY IATS</u> <u>ANALYSIS METHOD - EPA 600/R - 93/116</u>							
Ohio Asbestos Hazard Evaluation Specialist: <u>JIM PRARAT</u>		Certification # <u>AHES 3073</u>					
VII. Approximate Amount of Asbestos Materials:							
	RACM to be Removed	Nonfriable Asbestos Material to be Removed		Nonfriable Asbestos Material NOT to be Removed			
		Category I	Category II	Category I	Category II		
Pipes (linear feet)	<u>4,000</u>		<u>TRANSITE</u>				
Surface Area (square feet)	<u>FLOOR TINE</u>	<u>65,800</u>	<u>3,500</u>				
Facility Components (cubic feet)							
VIII. Scheduled Dates Demolition or Renovation: Start: <u>12-23-09</u> Complete: <u>7-30-2010</u>							
IX. Dates for Asbestos Removal (MM/DD/YY) Start: <u>12-23-09</u> Complete: <u>6-30-2010</u>							
Days of the Week:	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Hours of Operation:	<u>7A-8P</u>	<u>7A-8P</u>	<u>7A-8P</u>	<u>7A-8P</u>	<u>7A-8P</u>		
Complete all unshaded spaces, except demolitions which involve less than 260 linear feet, 160 square feet, or 35 cubic feet of RACM, need not complete spaces XI, XII, XIII, XIV, and XV. Notifications for Emergency Demolition or Emergency Renovation must supply attachments.							

**OHIO ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF DEMOLITION AND RENOVATION**

<p>X. Description of planned Demolition or Renovation work to be performed and method(s) to be employed, including demolition or renovation techniques to be used and description of affected facility components: <i>SELECTIVE STRUCTURAL DEMOLITION OF EXISTING FACILITY BY MEANS OF HEAVY EQUIPMENT. DEMOLITION OPERATIONS, INCLUDING WASTE HAULING/LOADING, PERFORMED WET TO PREVENT VISIBLE EMISSIONS. ASBESTOS ABATEMENT PRIOR TO DEMO.</i></p>
<p>XI. Description of work practices and engineering controls to be used to comply with the requirements, including asbestos removal and waste handling emission control procedures: <i>ISOLATE & DEMARCATED AREA. REMOVE MATERIAL AS A COMPONENT WET AND PLACE IMMEDIATELY INTO PROPERLY LABELED CONTAINERS FOR DISPOSAL. MANIFESTS TO OWNER</i></p>
<p>XII. Waste Transporter #1 Name: <u>METRO DISPOSAL</u> Address: <u>8100 UNION AVE</u> City: <u>CLEVELAND</u> State: <u>OH</u> Zip Code: <u>44105</u> Contact: <u>DISPATCH</u> Telephone: <u>(216) 423-2037</u> Fax: <u>(216) 658-3194</u></p> <p>Waste Transporter #2 Name: _____ Address: _____ City: _____ State: _____ Zip Code: _____ Contact: _____ Telephone: (____) _____ Fax: (____) _____</p>
<p>XIII. Waste Disposal Name: <u>MINERVA LANDFILL</u> Address: <u>9500 MINERVA RD</u> City: <u>WAYNESBURG</u> State: <u>OH</u> Zip Code: <u>44688</u> Contact: <u>STEVE CHANDLER</u> Telephone: <u>(330) 866-3435</u> Fax: <u>(330) 866-3488</u></p>
<p>XIV. Emergency Demolition (complete Item XIV and all other sections, only if this project is an Emergency Demo.) 1. Attach a copy of the Order to this notice. 2. Name of Authority Issuing Order: _____ Title: _____ 3. Authority of Order (Citation of Code): _____ 4. Date of Order (MM/DD/YY): _____ Date Ordered to Begin: _____</p>
<p>XV. Emergency Renovation (Attach separate sheet with the following information if project is Emergency Reno.) 1. Date and Hour of the Emergency _____ 2. Description of the Sudden, Unexpected Event _____ 3. Explanation of how the event caused unsafe conditions or equipment damage or an unreasonable financial burden. _____</p>
<p>XVI. Description of procedures to be followed in the event that unexpected RACM is found or nonfriable ACM becomes crumbled, pulverized or reduced to powder. <i>IMMEDIATELY WET MATERIAL, PLACE IN PROPER CONTAINERS, AND NOTIFY RESPONSIBLE AGENCY</i></p>
<p>XVII. I certify that an individual trained in the provisions of NESHAPS (40 CFR PART 61, SUBPART M) will be on-site during the Demolition or Renovation and evidence that the required training has been accomplished by this person will be available during normal business hours.</p> <p align="center">  12-9-09 Steven Hyland VP </p> <p align="center"> Signature of Owner/Operator Date Type or Print Name and Title </p>
<p>XVIII. I acknowledge the existence of laws prohibiting the submission of false or misleading statements and I certify that facts contained in this notification are true, accurate, and complete.</p> <p align="center">  12-9-09 Steven Hyland VP </p> <p align="center"> Signature of Owner/Operator Date Type or Print Name and Title </p>
<p align="center">Original Notification must be mailed or hand delivered at least ten working days (Monday-Friday excluding weekends) before demolition or renovation begins, except emergency demolitions and emergency renovations (see regulation) which must be submitted as soon as possible before operations begin, but no later than the following work day. (Form Revised 1/5/09)</p>

Samec, Michael

From: StevenHyland@aol.com
Sent: Wednesday, May 05, 2010 10:33 PM
To: Baker, George; Samec, Michael
Cc: jimhyland3@gmail.com; john@gatewaysolves.com; teamenv@msn.com; jprarat@hotmail.com
Subject: 10101 Woodland Ave Revised EPA Notice 4/30/2010
Attachments: 10101 Woodland EPA Notice 4-30-2010 001.jpg; 10101 Woodland EPA Notice 4-30-2010.jpg

Please review attached notice

Steven Hyland
HARPER INDUSTRIES, INC.
4579 Poth Rd
Columbus OH 43213
614-579-5566 cell
stevenhyland@aol.com