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Environmental Monitoring, LLC.

◆Asbestos, Lead Paint and Construction Air Monitoring ◆Consulting ◆Bulk Sampling for Laboratory Analysis◆
(352) 203-4081 email: robpbo3@gmail.com or rrasmussen72@gmail.com

FL Licensed Asbestos Business Organization No. ZA527

U.S. EPA Certified Lead-Based Paint Activities Firm No. NAT-F178890

November 14, 2023

Project:
Asbestos Survey for Demolition
South Shed
2259 SW Ft. King St.
Ocala, FL 34471



Client:
City of Ocala Code Enforcement
210 SE 3rd St.
Ocala, FL 34471



Unofficial without seal
Peter Swarr, PE #44159FL
LAC #63

Signed electronically 11/17/23 by
Peter C. Swarr, PE

6548 SW 131st Place Ocala, FL 34473

352.203.4081

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Ocala, FL 34471

According to your instructions **PbO₃** Environmental Monitoring, LLC. has completed an asbestos survey at the subject property (Project). The following pages of this report contain the results of this inspection. This asbestos inspection report presents data that describes the location of asbestos-containing material (ACM) identified only within the project scope. This report is to be used as a program-planning tool for any proposed demolition, renovation, construction and/or maintenance activities scheduled at this facility. This survey was conducted on site by EPA/AHERA trained professional inspector.

Suspect materials not previously identified in this report may be encountered during any renovation or demolition. These materials should be assumed asbestos containing material until sample collection and subsequent analysis prove otherwise.

This report is intended for the exclusive use of our client. The findings are relevant to the conditions observed during the physical process of performing the Inspection. These findings should not be treated as absolute, nor should they be relied upon to represent conditions at significantly later dates.

PbO₃ Environmental Monitoring, LLC.



Robert Rasmussen
Building Inspector
Asbestos License # ZA527

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1.0 INTRODUCTION

PbO₃ was contracted by our client to conduct an Asbestos Survey of suspect asbestos containing materials found in the subject property.

- 1) Identify suspect asbestos-containing materials that would be disturbed during demolition and/or select renovations to this structure.

1.1 INSPECTION AND SAMPLING PROCEDURE

PbO₃ inspection and sample collection procedures are based on the Environmental Protection Agency (EPA) protocols.

An initial facility walk through is conducted to familiarize the inspector with the facility layout. The facility is then divided into functional available spaces that can be accessed. The suspect homogeneous materials are selected for bulk sampling. Samples are collected and placed into separate, sealed plastic bags. Each sample is individually numbered, and sample information is entered onto a Field Data Sheet. Sample tools are decontaminated after each sample collection. The samples are delivered to an accredited laboratory for analysis, accompanied by a completed Chain of Custody Form.

Suspect materials are divided into three categories: surfacing materials (such as plaster and surface coatings), thermal system insulation (TSI) (such as mudded TSI fittings, duct insulation, and pipe insulation), and miscellaneous material (such as floor tile, drywall, and mastic). Asbestos-containing materials are classified according to:

- Friability**
- * Friable
 - * Non-friable

Friable asbestos-containing material (ACM), is defined as any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. (Sec. 61.141)

Nonfriable ACM is any material containing more than one percent (1%) asbestos as determined using the method specified in Appendix A, Subpart F, 40 CFR Part 763, Section 1, Polarized Light Microscopy (PLM), that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. EPA also defines two categories of nonfriable ACM, Category I and Category II nonfriable ACM, which are described later in this guidance.

"Regulated Asbestos-Containing Material" (RACM) is (a) friable asbestos material, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

A particular suspect material may be found in several different locations within a facility. The EPA does not require that these materials be sampled in each location, provided the materials are of the same type, age, appearance, have the same date of installation, and are sampled in accordance with EPA requirements to provide statistically reliable data that can be extrapolated onto all remaining non-sampled areas.

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Accredited inspectors determine the number of samples of each material to be collected, depending on the material's category and the amount of material present.

The EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations and the Florida Department of Environmental Protection (FDEP) Asbestos program regulate the removal and disposal of asbestos-containing building materials (any material containing more than 1% asbestos).

Asbestos NESHAP regulations must be followed for demolitions and/or renovations of facilities with at least 80 linear meters (260 linear feet) of regulated asbestos-containing materials (RACM) on pipes, 15 square meters (160 square feet) of regulated asbestos-containing materials on other facility components, or at least one cubic meter (35 cubic feet) of facility components where the amount of RACM previously removed from pipes and other facility components could not be measured before stripping.

1.2 METHODS OF LABORATORY ANALYSIS

Samples are analyzed in accordance with AHERA requirements using the following reference methods:

- EPA Interim Method for the Detection of Asbestos in Bulk Insulation Samples (EPA 600/M4-82020, December 1982).
- McCrone Research Institute's The Asbestos Particle Atlas.

All bulk samples are analyzed using PLM visual area estimate (VAE). Friable materials containing asbestos estimated at less than ten percent by PLM-VAE may be reanalyzed by PLM point counting. Additional treatment and tests may be used as required to accurately define composition (i.e., ashing, extractions, and TEM). All bulk sample laboratory reports are verified through an established quality assurance (QA) procedure.

1.3 QUALITY CONTROL PROCEDURES

Laboratories accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) analyze all samples. These laboratories participate in the NVLAP, as well as the American Industrial Hygiene Association (AIHA) Bulk Asbestos Sample Quality Assurance Program. **PbO₃** verifies all sample data for accuracy by cross-referencing Field Data Sheets, Chain of Custody Forms, and field notes.

1.4 DETERMINATION OF ACM CLASSIFICATION

The positive identification of asbestos in a material or product can only be made through laboratory analysis. Visual inspection or common knowledge is not a positive test. The asbestos content of a suspect material is determined by collecting a bulk sample and having it analyzed by PLM. The PLM technique determines the specific type of asbestos present in the bulk sample and VAE provides an estimate of the percentage of asbestos.

The EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) - National Emission Standard for Asbestos (40 CFR Part 61, subpart M) defines a non-friable asbestos-containing material as any material with an asbestos content greater than one percent as determined by PLM analysis. A friable material estimated to

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contain less than ten percent asbestos as determined by PLM-VAE must be analyzed by PLM point counting and determined to contain less than one-percent asbestos in order to be considered a non-regulated ACM.

A clarification memorandum issued by the EPA regarding the NESHAP regulation included the following statement:

The parties legally responsible for a building (owner or operator) may take a conservative approach to being regulated by the NESHAP. The responsible party - may choose to act as though the building material is an asbestos-containing material (greater than 1%) at any level of asbestos content (even less than 1% asbestos). Thus, if the analyst detects asbestos in the sample and estimates the amount to be less than 10% by visual estimation, the parties legally responsible (owner or operator) of the building may elect to assume the amount to be greater than 1% and treat the material as regulated asbestos containing material or require verification of the amount by point counting.

1.5 INSPECTION LIMITS

PbO₃ has performed the Client requested tasks in a thorough and professional manner consistent with commonly accepted standard industry practices, using state of the art practices and best available known technology, as of the date of the assessment. **PbO₃** cannot guarantee and does not warrant that this Asbestos Survey has identified all adverse environmental factors and/or conditions affecting the subject properties on the date of the Assessment. **PbO₃** cannot and will not warrant that this Asbestos Survey that was requested by the client will satisfy the dictates of, or provide a legal defense in connection with, any environmental laws or regulations. It is the responsibility of the client to know and abide by all applicable laws, regulations, and standards. The results reported and conclusions reached by **PbO₃** are solely for the benefit of the client. The results and opinions in this report, based solely upon the conditions found on the property as of the date of the Assessment, will be valid only as of the date of the Assessment. Please note that the test results relate only to those homogeneous materials tested. If conditions, or materials, other than those addressed in this report are encountered during the planned demolition activities, **PbO₃** should be contacted to assess the potential impact of these materials or conditions relative to the findings or recommendations included herein. The survey was performed by observing suspect materials throughout the structure where accessible. We must emphasize that it is not possible to look within every location of a building. The visual survey documents only general locations of suspect materials but does not determine exact boundaries. Concealed locations of asbestos may exist at the subject property, and the levels may vary from those stated in this report. There may be variations in the composition of materials which appear similar. Materials may be hidden from view and not accessible. Hypothetical examples include floor tile hidden under carpeting, and not detected by our typical examination of the area under the carpet at a corner(s) or existing hole(s), an abandoned length of insulated pipe hidden within a finished wall, an asbestos-cement sewer vent pipe in the wall behind a toilet, asbestos paper/felt between hardwood flooring and the sub-floor or old vinyl floor tile covered over with plywood and newer flooring materials. No attempt was made to disassemble equipment or demolish structural elements and finishes as this is beyond the scope of our authorized services. Visual observations were made only at convenient locations, due to these limitations, wall voids, flooring under carpet, building cavities and mechanical equipment, and other areas may contain unreported asbestos-containing materials. Suspect materials not previously identified in this report may be encountered during any demolition activity. These materials should be assumed asbestos containing material until sample collection and subsequent analysis prove otherwise.

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All fire doors should be assumed asbestos containing material since disassembly of locks and/or other work to access the door insulation is not possible.

We generally assume that roofing material, vinyl flooring and floor mastic contains asbestos, as asbestos roofing material, asbestos vinyl flooring and asbestos floor mastic are very common unless noted as sampled. Location and sampling of underground items, such as asbestos-cement pipes, would have been outside of the scope of the survey. Cloth jacketed electrical wiring if present, should be assumed asbestos containing material. Electrical wiring is typically not sampled unless the electrical system has been verified by our client as de-energized.

Electrical wiring is typically not sampled unless the electrical system has been verified by our client as de-energized. Swimming pools are not tested unless they are accessible and drained. Swimming pools should be assumed an asbestos containing material.

EPA 6001R-93/116 is the specified method for analysis of bulk material samples for asbestos under the EPA Asbestos Hazard Emergency Response Act, there have been reports that this method may not identify asbestos when fiber sizes are extremely small or if they are bound in a resinous material. Such materials include floor tile, mastic and asphaltic roofing. Currently, reanalysis by Transmission Electron Microscopy (TEM) to verify results of <1 % or "None Detected" for these materials is recommended.

Quantities shown in this survey are estimates, actual quantities may vary. Field verification is the responsibility of the contractor. Contractors are responsible for their own verification of quantities prior to bid submittal.

Suspect materials not previously identified in this report may be encountered during any demolition, renovation and/or maintenance activities. These materials should be assumed asbestos containing material until sample collection and subsequent analysis prove otherwise.

1.6 INSPECTION DATE AND INSPECTOR INFORMATION:

PbO₃ employee Richard Anderson inspected the structure on November 9, 2023.

2.0 FACILITY CONSTRUCTION INFORMATION:

The structure is a metal framed structure on CMU blocks with a metal roof.

2.1 FACILITY MAINTENANCE AND/OR RENOVATION HISTORY

Unknown

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2.2 SUSPECT MATERIAL SUMMARY

- CMU Block

2.3 RESULTS

There was a total of Three (3) samples (including sub-samples) analyzed by EPA Method 600/M4/82/020R-93/116. Based upon our visual observations, bulk sampling of suspect materials and subsequent microscopic analysis, we have determined that **No Asbestos Containing Material was detected.**

2.4 RECOMMENDATIONS

Suspect materials not previously identified in this report may be encountered during any demolition, renovation and/or maintenance activities. These materials should be assumed asbestos containing material until sample collection and subsequent analysis prove otherwise.

That this survey be used to identify asbestos containing material and components prior to any planned demolition, renovation, construction and/or maintenance activities scheduled at this facility.

Controlled "Wet" demolition of all materials in place is recommended. Provided the demolition activities do not subject presumed non-friable asbestos containing material (if present) to cutting, sanding, grinding, abrading, or otherwise rendering them friable during demolition.

29 CFR 1926.1101- OSHA's Asbestos Standard for the Construction Industry does apply to the demolition of all buildings identified with Asbestos Containing Material (ACM) and/or presumed ACM. The contractor will need to comply with the specific training, duties and responsibilities outlined in this CFR.

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General Recommendations

The EPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations and the Florida Department of Environmental Protection (DEP) Asbestos program regulate the removal and disposal of asbestos-containing building materials. The Florida Department of Environmental Protection (DEP) administers an asbestos removal program under Chapter 62-257, Florida Administrative Code. The Asbestos NESHAP has been adopted by reference in section 62-204.800, Florida Administrative Code. The program's intent is to minimize the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material.

The regulations of these agencies require the removal of friable asbestos-containing materials prior to extensive renovation or demolition projects, and the removal of non-friable asbestos-containing materials that may be rendered friable in the course of renovation or demolition projects. Only a Florida licensed asbestos contractor using properly trained, certified, and licensed asbestos workers can perform asbestos removal projects in Florida. Air monitoring during and after abatement activities is also recommended to document the fiber levels inside and outside the abatement work area.

The asbestos NESHAP requires that an asbestos trained person be on site i.e. 40 CFR 61.145 (c) (8) states in part "no RACM shall be stripped, removed, or otherwise handled or disturbed at a facility regulated by this section unless at least one on-site representative, such as a foreman or management level person or other authorized person, trained in the provisions of this regulation and the means of complying with them is present."

DEP recommends that this "trained person" be on site when non-friable ACM is present so that developing problems can be caught early and corrected without delay. In addition, the regulations require the owner of the building and/or the operator to notify the applicable DEP District Office or Local Pollution Control Agency before any demolition, or before renovations of buildings that contain a certain threshold amount of asbestos or asbestos containing materials.

Florida requires the submission of a 10-Day Notification for all renovations and demolitions of facilities with at least 260 linear feet of regulated asbestos-containing materials (RACM), 160 square feet of regulated asbestos containing materials on other facility components, or at least one cubic meter (35 cubic feet) off facility components. Asbestos waste requires disposal at an approved solid waste disposal facility.

Local agencies may also have specific requirements for demolition/renovation projects involving asbestos-containing building materials.

OSHA 29 CFR 1910.1001 requires the communication of information concerning asbestos hazards. Employees engaged in work activities with installed ACM may be exposed to asbestos fibers. The owner or operator should take the necessary steps to reduce the potential for disturbance.

29 CFR 1926.1101- OSHA's Asbestos Standard for the Construction Industry does apply to the abatement, renovation and/or demolition of all buildings identified with asbestos containing material. The contractor will need to comply with the specific training, duties and responsibilities outlined in this CFR.

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Dear Customer:

Pb03 Environmental Monitoring Company, would like to thank you for allowing us the opportunity to be of service to you. We value our customers and therefore **Pb03** prides itself on making sure every customer is fully satisfied.

If there is ever another opportunity that we can be of service to you, we would appreciate the call. The services we provide for future reference are as follows.

- Lead Testing and Consulting, Paint, Soil, Water and Dust.
- Asbestos Testing, Consulting and Monitoring.
- Indoor Air Quality Testing.
- Mold Assessments and Clearances.
- And various other environmental issues.

If you should have any questions, comments or concerns please contact us at (352) 203-4081. Once again, thank you for using **Pb03**.

Sincerely,

Pb03 Environmental Monitoring, LLC

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APPENDIX A
LABORATORY RESULTS



Asbestos Bulk Analysis Report

Environmental Hazards Services, L.L.C.
7469 Whitepine Rd
Richmond, VA 23237
Telephone: 800.347.4010

Report Number: 23-11-01821

Client: PbO3 Environmental Monitoring, LLC
6548 SW 131st Place
Ocala, FL 34473

Received Date: 11/13/2023
Analyzed Date: 11/14/2023
Reported Date: 11/14/2023

Project/Test Address: Demo; 2259 SW Ft. King St South Shed; Ocala, FL

Client Number:
201413

Fax Number:
321-507-4914

Laboratory Results

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
23-11-01821-001	2259-S-01		Gray Cementitious; Homogeneous	NAD	100% Non-Fibrous
23-11-01821-002	2259-S-02		Gray Cementitious; Homogeneous	NAD	100% Non-Fibrous
23-11-01821-003	2259-S-03		Gray Cementitious; Homogeneous	NAD	100% Non-Fibrous

Client Number: 201413
Project/Test Address: Demo; 2259 SW Ft. King St South Shed;
Ocala, FL

Report Number: 23-11-01821

Lab Sample Number	Client Sample Number	Layer Type	Lab Gross Description	Asbestos	Other Materials
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QC Sample: 57-M22009-1
QC Blank: SRM 1866 Fiberglass
Reporting Limit: 1% Asbestos
Method: EPA Method 600/R-93/116, EPA Method 600/M4-82-020
Analyst: Keleigh King

Reviewed By Authorized Signatory:



Tasha Eaddy
QA/QC Clerk

These results are based on a comparative visual estimate. The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Each distinct component in an inhomogeneous sample was analyzed separately and reported as a composite. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. California Certification #2319 NY ELAP #11714 NVLAP #101882-0 VELAP 460172. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection.

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

400 Point Count Analysis, where noted, performed per EPA Method 600/R-93/116 with a Reporting Limit of 0.25%.

* All California samples analyzed by Polarized Light Microscopy, EPA Method 600/M4-82-020, Dec. 1982.

LEGEND: NAD = no asbestos detected

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APPENDIX B
CERTIFICATIONS

THE ASBESTOS INSTITUTE

Certifies that

Robert Rasmussen

has attended and received instruction in the EPA approved course

AHERA Building Inspector Refresher

on

July 21, 2023

and successfully completed and passed the competency exam.

Certificate:
ON-4644-7395-072123

Date of Examination:
21-Jul-2023

Date of Expiration:
21-Jul-2024



William T. Cavness
Director



Approved Instructor

THE ASBESTOS INSTITUTE

20033 N. 19th Ave, Building 6, Phoenix, AZ 85027

602-864-6564 – www.theasbestosinstitute.com

The person receiving this certificate has completed the requisite training for asbestos accreditation under TSCA Title II.

THE ASBESTOS INSTITUTE

Certifies that

Richard Anderson

has attended and received instruction in the EPA approved course

AHERA Building Inspector Refresher

on

January 09, 2023

and successfully completed and passed the competency exam.

Certificate:
ON-4644-11173-010923

Date of Examination:
9-Jan-2023

Date of Expiration:
09-Jan-2024



William T. Cavness
Director



Approved Instructor

THE ASBESTOS INSTITUTE

20033 N. 19th Ave, Building 6, Phoenix, AZ 85027

602-864-6564 – www.theasbestosinstitute.com

This training meets all requirements for asbestos certification under Toxic Substance Control Act Title II.



Ron DeSantis, Governor

Melanie S. Griffin, Secretary



**STATE OF FLORIDA
DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION**

ASBESTOS LICENSING UNIT

THE ASBESTOS BUSINESS ORGANIZATION HEREIN IS LICENSED UNDER THE
PROVISIONS OF CHAPTER 469, FLORIDA STATUTES

PBO3 ENVIRONMENTAL MONITORING, LLC

PETER C SWARR
6548 SW 131ST PLACE
OCALA FL 34473

LICENSE NUMBER: ZA527

EXPIRATION DATE: NOVEMBER 30, 2025

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United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 101882-0

Environmental Hazards Services, L.L.C.
North Chesterfield, VA

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

Asbestos Fiber Analysis

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communique dated January 2009).*

2023-01-01 through 2023-12-31

Effective Dates



For the National Voluntary Laboratory Accreditation Program

**National Voluntary
Laboratory Accreditation Program**



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017

Environmental Hazards Services, L.L.C.

7469 Whitepine Road

North Chesterfield, VA 23237-2261

Ms. Julie Dickerson

Phone: 804-275-4788 Fax: 804-275-4907

Email: jdickerson@leadlab.com

<http://www.leadlab.com>

ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 101882-0

Bulk Asbestos Analysis

Code

Description

18/A01

EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples

18/A03

EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

For the National Voluntary Laboratory Accreditation Program