



LIMITED NESHAP ASBESTOS
DEMOLITION/RENOVATION SURVEY
UTILITY OPERATIOIS DEPARTMENT
(LABORATORY AREA)
5101 65TH STREET WEST
BRADENTON, MANATEE COUNTY, FLORIDA
PSI PROJECT NO. 552-3A036

April 9, 2003

Mr. Charles Bishop
Project Manager
Manatee County Government
1026 26th Avenue East
Bradenton, Florida 34208

RE: **Limited NESHAP Asbestos
Demolition Renovation Survey**
Utility Operations Department
(Laboratory Area)
5101 65th Street West
Bradenton, Manatee County, Florida
PSI Project No. 552-3A036

Dear Mr. Bishop:

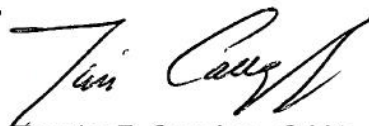
Enclosed herewith please find three (3) copies of the above-referenced NESHAP Asbestos Demolition/Renovation Sampling Survey. After your review, if you have any questions or concerns, please do not hesitate to contact Mr. Keith R. Kartovicky at (813) 886-1075, ext. 216.

Professional Service Industries, Inc. appreciates the opportunity to work with the Manatee County Government on this project. We look forward to working with you again in the future.

Respectfully submitted,
PROFESSIONAL SERVICE INDUSTRIES, INC.



Bruce Reed
Asbestos AHERA Inspector



Timothy F. Caughey, C.I.H.
Florida Licensed Asbestos Consultant
License No. IA-0000016



Keith R. Kartovicky
Senior Project Manager

KRK/ljs

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**LIMITED NESHAP ASBESTOS
DEMOLITION/RENOVATION SURVEY**

Of

**UTILITY OPERATIONS DEPARTMENT
(LABORATORY AREA)
5101 65TH STREET WEST
BRADENTON, MANATEE COUNTY, FLORIDA**

Prepared for

**MANATEE COUNTY GOVERNMENT
1026 26TH AVENUE EAST
BRADENTON, FLORIDA 34208**

Conducted by

**Professional Service Industries, Inc.
5801 Benjamin Center Drive
Suite 112
Tampa, Florida 33634
(813) 886-1075**

PSI Project Number 552-3A036

April 9, 2003



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SECTION I EXECUTIVE SUMMARY

General

Professional Service Industries, Inc. (PSI) was retained by the Manatee County Government to conduct an National Emissions Standard for Hazardous Air Pollutants (NESHAP) asbestos demolition/renovation sampling survey limited to the Utility Operations Department's Laboratory area located at 5101 65th Street West in Bradenton, Manatee County, Florida. At the client's request roofing is not a part of this survey.

PSI conducted this sampling survey in general accordance with the NESHAP and the scope of work as requested by the client to facilitate demolition/renovation of the structure.

Mr. Bruce Reed of PSI conducted the survey on April 2, 2003.

The purpose of the survey was to identify, locate and quantify friable and non-friable suspect asbestos-containing materials located at the subject site. During the survey, a total of twenty-four (24) samples of suspect Asbestos-Containing Materials (ACM) were collected from eight (8) homogeneous areas and analyzed by Polarized Light Microscopy (PLM). The EPA considers a homogenous material to be asbestos containing if at least one sample of this material is greater than one percent (>1%) asbestos. **Results of laboratory analysis confirmed that none of the sampled materials contain greater than one percent (>1%) asbestos.**

Purpose

The purpose of this study was to provide information regarding the presence of asbestos on the site, which may have cost considerations associated with the demolition/renovation of the laboratory area located within the Utility Operations Department at 5101 65th Street West in Bradenton, Florida.

PSI warrants that the findings contained herein have been promulgated in general accordance with accepted professional practices at the time of its preparation as applied by professionals in the community.



NESHAP ASBESTOS DEMOLITION/RENOVATION SURVEY
5101 65TH STREET WEST
PSI PROJECT NO. 552-3A036

APRIL 9, 2003
PAGE iii

The report is limited to the information available from the client at the time it was prepared and the conditions existing at the structure at the time of the limited survey. There is a possibility that conditions may exist which could not be identified within the scope of the survey or which were not apparent during the site visit.

The NESHAP asbestos demolition/renovation sampling survey was performed and a final report prepared by PSI. The report has been included in its entirety in this document for review by Manatee County Government and has been prepared for the exclusive use of Manatee County Government.



I. INTRODUCTION

Asbestos, once commonly referred to as the miracle mineral, has been used as a reinforcement fiber for more than 3,000 years. Due to the abundant availability of the fiber, its acoustical and tensile qualities, and its resistance to fire and chemicals, asbestos was used extensively in building materials.

However, inhalation of asbestos fibers has been found to be a health hazard to humans, and building owners may be held liable for the presence of the fibers and subsequent inhalation by occupants. Due to these factors, a move is presently underway among building owners in both the public and private sectors to identify any asbestos-containing materials (ACM) in their buildings. This identification is accomplished by building inspections, which are the first step in a plan to effectively control and/or remove any known asbestos-containing materials found.

Current EPA statutes address presently friable (easily crumbled) and non-friable materials. Non-friable building materials do not create an environmental exposure unless they are sawn, broken, ripped, or pulverized. However, even materials that are well wrapped and technically non-friable at the time of inspection have the potential to become friable very readily by accidental tearing or other disturbance. It is for this reason, as well as to simply inform the owner of all asbestos-containing materials, that Professional Service Industries, Inc.'s policy is to address all materials which are Potentially friable as well as those presently friable. This report has been organized in a manner that presents the data in several forms to best suit the needs of the building owner. The Quality Control and Method of Quantification section explains our testing and quality control methods. The Petrographic Results section is a listing of samples taken and their asbestos content. The spreadsheets contain detailed information on the locations, types, and quantities of all documented asbestos materials sampled.

II. METHODOLOGY

GENERAL REFERENCES

The Manatee County Government authorized PSI to conduct a NESHAP asbestos demolition/renovation sampling survey and to analyze samples taken during the survey, by forwarding IFAS No. W3000155 dated March 27, 2003. The survey was performed per Work Assignment No. 61PE PSI Proposal No. 552-A3036 dated March 14, 2003.

Asbestos survey and sampling procedures were performed in general accordance with National Emissions Standard for Hazardous Air Pollutants (NESHAP) regulation and the guidelines published by the EPA in 40 CFR Part 763 Subpart E, October 30, 1987, last amended July 3, 1993.

ASBESTOS SAMPLING SURVEY GENERAL ORGANIZATION

The study itself consisted of three major activities: visual observation, sampling, and quantification. Although these activities are listed separately, they are integrated tasks.

VISUAL OBSERVATION

The visual observation was performed by EPA accredited inspector Mr. Bruce Reed, Certification 7ME08087402IR007. An initial building walk-through was conducted to determine the presence and condition of suspect materials, which were accessible and/or exposed. Materials which were similar in general appearance, were grouped into homogeneous sampling areas. Functional spaces were also identified. Such materials are termed "homogeneous materials" by the EPA. During this walk-through, the approximate quantities of these homogeneous materials were also noted. Only materials, which were accessible and/or exposed and suspected to contain asbestos, were identified.

Homogeneous Material Classifications

Following the EPA inspection protocol, each identified suspect homogeneous material was placed in one of the following EPA classifications:

Surfacing Materials (sprayed or trowel applied to building members)

Thermal System Insulation (materials generally applied to various mechanical system[s])

Miscellaneous Materials (any materials which do not fit either of the above categories)



SAMPLING PROCEDURES

Following the walk-through of the laboratory located within the Utility Operations Department at 5101 65th Street West, the inspector collected selected samples of exposed and/or accessible materials identified as suspect ACM.

EPA and NESHAP guidelines were used to determine the sampling protocol. Sampling locations were chosen to be representative of the homogeneous material.

Samples of miscellaneous materials were taken as randomly as possible while again attempting to sample already damaged areas so as to minimize disturbance of the material. Sampling was scheduled to minimize interference with building occupants. After each sample was extracted, a spray encapsulate was applied to the sampled area to prevent potential fiber release.

QUANTIFICATION

Quantities of accessible and/or exposed building materials, which were suspected of containing asbestos, were estimated. This estimation was performed by taking approximate measurements in the field.



III. THE LABORATORY

All samples collected during this survey were analyzed at PSI's Polarized Light Microscopy Laboratory in Pittsburgh, Pennsylvania. Our PLM/DS laboratory is staffed with microscopists who are graduates of the McCrone Research Institute, which certifies individuals for the analysis of asbestos-containing materials. Lab results are computerized for greater efficiency.

A. POLARIZED LIGHT MICROSCOPY LABORATORY ACCREDITATION

Professional Service Industries, Inc. is accredited under the National Institute of Standards and Technology's (NIST) certification program. The National Voluntary Laboratory Accreditation Program (NVLAP) replaces the EPA's interim program for Bulk Sample Quality Assurance. PSI has participated in the EPA's quality assurance program since the program was established in 1983. PSI has also received American Industrial Hygiene Association (AIHA) accreditation. Our NVLAP Laboratory Number is 1350.

B. PSI LABORATORY QUALITY CONTROL PROGRAM

PSI maintains an in-house quality control program in addition to participating in the U.S. Environmental Protection Agency Bulk Sample Quality Assurance Program. Our in-house program consists of blind reanalysis of five percent of all samples. This reanalysis is done by a designated Quality Control Microscopist. In addition, the Quality Control Microscopist reanalyzes the samples that were originally reported between trace and five percent asbestos. There is also voluntary quality control reanalysis and mandatory source material dependent quality control reanalysis for sample types that are particularly difficult to analyze.

C. METHOD OF ANALYSIS

Analysis was performed by using the bulk sample for visual observation and slide preparation(s) for microscopic examination and identification. The samples were mounted on slides and then analyzed for asbestos (Chrysotile, amosite, crocidolite, anthophyllite, and actinolite/tremolite), fibrous non-asbestos constituents (mineral wool, paper, etc.) and non-fibrous constituents. Asbestos was identified by refractive indices,



morphology, color, pleochroism, birefringence, extinction characteristics, and signs of elongation. The same characteristics were used to identify the non-asbestos constituents.

The microscopist visually estimated relative amounts of each constituent by determining the volume of each constituent in proportion to the total volume of the sample, using a stereoscope.

The Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) define asbestos containing material as any material which contains greater than one percent asbestos. When friable samples analyzed by Polarized Light Microscopy contain asbestos in amounts less than ten (< 10%) percent, a more exact method of analysis called point counting may be performed at the client's request. When the results of this method are less than or equal to one percent ($\leq 1\%$) asbestos, then the material is not regulated by the EPA or OSHA.

The test results are based on a visual determination of relative volume of the bulk sample components. The results are valid only for the item tested. This report may not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Method used: EPA Method for the Determination of Asbestos in Bulk Building Materials (EPA/600/R-93/116 July 1993).



IV. FINDINGS AND OBSERVATIONS

The Utility operations Department located at 5101 65th Street West in Bradenton Florida is a concrete block structure built slab on grade. Interior finishes of the structure include but are not limited to, 2' x 2' ceiling panels, drywall, and ceramic floor tile. The area surveyed was limited to the laboratory area.

Bulk Material Samples

A total of twenty-four (24) samples were collected from eight (8) homogeneous areas during the survey and were analyzed by Polarized Light Microscopy (PLM). The following chart lists each material sampled, sample locations, approximate quantity of material located throughout the surveyed area and percentage of asbestos fibers found in the material sampled.

Homo. No.	Sample No.	Material Description	Sampled Location	Approx. Quantity ⁽¹⁾	% Asbestos Type	NESHAP Category
01	01	2' x 2' deep pock mark ceiling panels	Lab area, west side outside of Room 301	1,742 sq. ft.	NAD ⁽²⁾	N/A ⁽³⁾
01	02	2' x 2' deep pock mark ceiling panels	Lab area, center		NAD	N/A
01	03	2' x 2' deep pock mark ceiling panels	Lab area, east side		NAD	N/A
02	04	2' x 2' smooth texture replacement ceiling panels	Lab area, north side of lab	266 sq. ft.	NAD	N/A
02	05	2' x 2' smooth texture replacement ceiling panels	Lab area, outside balance room		NAD	N/A
02	06	2' x 2' smooth texture replacement ceiling panels	Lab area, wet chem. Ph area, northeast side		NAD	N/A
03	07	White mastic on metal exhaust pipe	Lab area above #1 fume hood on metal exhaust pipe	16 sq. ft.	NAD	N/A
03	08	White mastic on metal exhaust pipe	Lab area above fume hood #2 on metal exhaust pipe		NAD	N/A



Homo. No.	Sample No.	Material Description	Sampled Location	Approx. Quantity ⁽¹⁾	% Asbestos Type	NESHAP Category
03	09	White mastic on metal exhaust pipe	Lab area above fume hood #5 on metal exhaust pipe		NAD	N/A
04	10	Beige mastic on paper-foil over fiberglass on small pipe lines	Lab area above fume hood #3, small pipe lines	25 sq. ft.	NAD	N/A
04	11	Beige mastic on paper-foil over fiberglass on small pipe lines	Lab area above fume hood #3, small pipe lines		NAD	N/A
04	12	Beige mastic on paper-foil over fiberglass on small pipe lines	Lab area above large fume hood, small pipe lines		NAD	N/A
05	13	Drywall and joint compound	Laboratory supervisor office 301 behind door	4,500 sq. ft.	NAD	N/A
05	14	Drywall and joint compound	Lab area, balance room behind door		NAD	N/A
05	15	Drywall and joint compound	Lab area, solvent storage room behind door		NAD	N/A
06	16	2' x 2' pinhole texture over fiberglass ceiling panels	Lab area, acid storage room, east side	66 sq. ft.	NAD	N/A
06	17	2' x 2' pinhole texture over fiberglass ceiling panels	Lab area, acid storage room, west side		NAD	N/A
06	18	2' x 2' pinhole texture over fiberglass ceiling panels	Lab area, solvent storage room over door		NAD	N/A
07	19	Yellow baseboard mastic	Lab area, northwest side	333 lin. ft.	NAD	N/A
07	20	Yellow baseboard mastic	Lab area, Bod room, northeast side		NAD	N/A
07	21	Yellow baseboard mastic	Lab area, extraction room, west side		NAD	N/A



Homo. No.	Sample No.	Material Description	Sampled Location	Approx. Quantity ⁽¹⁾	% Asbestos Type	NESHAP Category
08	22	Gray fiber panels	Lab area located in fume hood #5	19 sq. ft.	NAD	N/A
08	23	Gray fiber panels	Lab area located in fume hood #5		NAD	N/A
08	24	Gray fiber panels	Lab area located in fume hood #5		NAD	N/A

- (1) Approximate quantity located throughout the surveyed area; sq. ft. = square feet; lin. ft. = linear feet
(2) NAD = No Asbestos Detected
(3) N/A = Not Applicable



V. CONCLUSIONS

ASBESTOS CONTAINING MATERIALS

Results of laboratory analysis confirmed that none of the twenty-four (24) sampled materials collected from eight (8) homogeneous areas contained asbestos mineral fibers.

There is no further action necessary at this time

NON-ASBESTOS CONTAINING MATERIALS

Asbestos was not detected in the following PSI sampled and analyzed materials:

- 2' x 2' deep pock mark ceiling panels
- 2' x 2' smooth texture replacement ceiling panels
- White mastic on metal exhaust pipe
- Beige mastic on paper-foil over fiberglass on small pipe lines
- Drywall and joint compound
- 2' x 2' pinhole texture over fiberglass ceiling panels
- Yellow baseboard mastic
- Gray fiber panels

If demolition/renovation activities expand into other areas not referenced in this survey, or if during demolition/renovation activities, materials are uncovered which have not been tested, or were not visible at the time of the survey, they should be assumed to be asbestos containing until laboratory testing proves otherwise.

APPENDICES

APPENDIX A
GLOSSARY OF TERMS



APPENDIX A

GLOSSARY OF TERMS

ABATEMENT -- Procedures to control fiber release from asbestos-containing building materials. Includes encapsulation, enclosure, and removal.

AIR MONITORING -- The process of measuring fiber content of a specific volume of air in a stated period of time.

AMBIENT EXPOSURE -- Exposure to environmental fiber concentrations (i.e., the normal concentration of fibers in an area prior to the disturbance of asbestos-containing materials).

AMENDED WATER -- Water to which a surfactant has been added to increase its penetrating capabilities.

ASBESTOS -- A defined group of naturally occurring minerals that separate into fibers. There are six asbestos minerals used commercially: Chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite.

ASBESTOS-CONTAINING MATERIAL -- Product containing a percentage of asbestos equal to or greater than the limits established by the appropriate federal, state, or local governing authority.

CONTAINMENT -- Isolation of the work area from the rest of the building to prevent escape of asbestos fibers.

DECONTAMINATION ENCLOSURE SYSTEM -- A series of connected rooms, with curtained doorways between any two adjacent rooms, for the decontamination of workers or material and equipment. A decontamination enclosure system always contains at least one air lock.

DELAMINATION -- The separation of individual layers of a multi-layered building material, such as the delamination of the layers in a sheet of plywood.

ENCAPSULATE -- To surround or penetrate with an adhesive matrix to prevent release of fibers.

ENCLOSURE -- An airtight barrier constructed around ACM to prevent fiber release.



GLOSSARY OF TERMS

(continued)

EXPOSURE (HUMAN) -- The presence of people in an area where levels of an airborne contaminant are elevated. A more technical definition sometimes found in specific literature is: The total amount of airborne contaminant inhaled by a person, typically approximated by the product of concentration and duration.

FIBROUS -- Contains or is composed of fibers.

FRIABLE -- Descriptive term referring to material which, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.

HEPA FILTER -- A High Efficiency Particulate Air filter capable of trapping and retaining 99.97% of mono-dispersed particles greater than 0.3 microns in size.

HEPA VACUUM -- A specialized vacuum which uses HEPA filters; the process of using a HEPA vacuum.

HOMOGENEOUS MATERIAL -- Material similar in appearance, color, texture, and date of application.

PEAK EXPOSURE -- Exposure at the time of disturbance to asbestos-containing material which creates relatively high fiber concentrations.

PREVALENT LEVELS -- Levels of airborne contaminant occurring under normal conditions.

PETROGRAPHIC -- Pertaining to the description of systematic classification of minerals.

REMOVAL -- All herein specified procedures necessary to strip all asbestos materials from the designated areas to dispose of these materials at an acceptable site.

SUBSTRATE -- The substance beneath a finish surface, such as the scratch coat and brown coat under finish plaster.



APPENDIX B

PETROGRAPHIC BULK SAMPLE RESULTS



REPORT OF BULK SAMPLE ANALYSIS FOR ASBESTOS

TESTED FOR: PSI, Inc
 5801 Benjamin Center Drive Suite 112
 Tampa, FL 33634
 Attn: Keith Kartovicky

Project ID: 552-3A036
 Manatee County
 Administration Renovation
 SW Regional Wastewater
 Treatment Plant

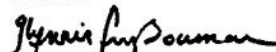
Date Received: 4/3/03 Date Completed: 4/4/03 Date Reported: 4/4/03

Analyst: DA Work Order: 0304075 Page: 1 of 3

Client ID	Lab ID (Layer)	Sample Description (Color, Texture, Etc.) <i>Analyst's Comment</i>	Asbestos Content (Percent and Type)	Non-asbestos Fibers (Percent and Type)
01-01	001A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	30% Cellulose fiber 30% Fibrous Glass
01-02	002A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	30% Cellulose fiber 30% Fibrous Glass
01-03	003A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	30% Cellulose fiber 30% Fibrous Glass
02-04	004A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	5% Fibrous Glass 45% Cellulose fiber
02-05	005A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	5% Fibrous Glass 45% Cellulose fiber
02-06	006A	(1) Gray, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	5% Fibrous Glass 45% Cellulose fiber
03-07	007A	(1) White, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
03-08	008A	(1) White, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
03-09	009A	(1) White, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported

Quantitation is based on a visual estimation of the relative area of bulk sample components, unless otherwise noted in the "Comments" section of this report. The results are valid only for the item tested. This report may not be used to claim product endorsement by NVLAP or any agency of the U.S. Government. Method used: E.P.A. Method for the Determination of Asbestos in Bulk Building Materials (EPA / 600/R-93/116 July 1993). Polarized Light Microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if the material can be considered or treated as non-asbestos containing. Samples will be disposed of within 30 days unless notified in writing by the client. No part of this report may reproduced, except in full, without written permission of the laboratory. The reporting limit is 1% by weight.

Respectfully submitted,
 PSI, Inc.



Approved Signatory
 Glynnis Bowman

Client ID	Lab ID (Layer)	Sample Description (Color, Texture, Etc.) <i>Analyst's Comment</i>	Asbestos Content (Percent and Type)	Non-asbestos Fibers (Percent and Type)
04-10	010A	(1) Beige, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Silver, Other, Homogeneous <i>Paper/Foil</i>	NO ASBESTOS DETECTED	45% Cellulose fiber
		(3) Yellow, Insulation, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
04-11	011A	(1) Beige, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Silver, Other, Homogeneous <i>Paper/Foil</i>	NO ASBESTOS DETECTED	45% Cellulose fiber
		(3) Yellow, Insulation, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
04-12	012A	(1) Beige, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Silver, Other, Homogeneous <i>Paper/Foil</i>	NO ASBESTOS DETECTED	45% Cellulose fiber
		(3) Yellow, Insulation, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
05-13	013A	(1) Gray, Drywall, Homogeneous	NO ASBESTOS DETECTED	10% Cellulose fiber
		(2) White, Joint Compound, Homogeneous	NO ASBESTOS DETECTED	None Reported
05-14	014A	(1) Gray, Drywall, Homogeneous	NO ASBESTOS DETECTED	10% Cellulose fiber
		(2) White, Joint Compound, Homogeneous	NO ASBESTOS DETECTED	None Reported
05-15	015A	(1) Gray, Drywall, Homogeneous	NO ASBESTOS DETECTED	10% Cellulose fiber
		(2) White, Joint Compound, Homogeneous	NO ASBESTOS DETECTED	None Reported
06-16	016A	(1) White, Texture, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Yellow, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
06-17	017A	(1) White, Texture, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Yellow, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
06-18	018A	(1) White, Texture, Homogeneous	NO ASBESTOS DETECTED	None Reported
		(2) Yellow, Ceiling Tile, Homogeneous	NO ASBESTOS DETECTED	100% Fibrous Glass
07-19	019A	(1) Yellow, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
07-20	020A	(1) Yellow, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported
07-21	021A	(1) Yellow, Mastic, Homogeneous	NO ASBESTOS DETECTED	None Reported

Quantitation is based on a visual estimation of the relative area of bulk sample components, unless otherwise noted in the "Comments" section of this report. The results are valid only for the item tested. This report may not be used to claim product endorsement by NVLAP or any agency of the U.S. Government. Method used: E.P.A. Method for the Determination of Asbestos in Bulk Building Materials (EPA / 600/R-93/116 July 1993). Polarized Light Microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if the material can be considered or treated as non-asbestos containing. Samples will be disposed of within 30 days unless notified in writing by the client. No part of this report may reproduced, except in full, without written permission of the laboratory. The reporting limit is 1% by weight.

Respectfully submitted,
PSI, Inc.



Approved Signatory
Glynnis Bowman

Analyst: DA

Work Order: 0304075

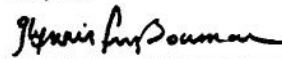
Page: 3 of 3

Client ID	Lab ID (Layer)	Sample Description (Color, Texture, Etc.) <i>Analyst's Comment</i>	Asbestos Content (Percent and Type)	Non-asbestos Fibers (Percent and Type)
08-22	022A	(1) Gray, Other, Homogeneous <i>Fiber Panel</i>	NO ASBESTOS DETECTED	100% Cellulose fiber
08-23	023A	(1) Gray, Other, Homogeneous <i>Fiber Panel</i>	NO ASBESTOS DETECTED	100% Cellulose fiber
08-24	024A	(1) Gray, Other, Homogeneous <i>Fiber Panel</i>	NO ASBESTOS DETECTED	100% Cellulose fiber

Report Notes: (PT) Point Count Results

Quantitation is based on a visual estimation of the relative area of bulk sample components, unless otherwise noted in the "Comments" section of this report. The results are valid only for the item tested. This report may not be used to claim product endorsement by NVLAP or any agency of the U.S. Government. Method used: E.P.A. Method for the Determination of Asbestos in Bulk Building Materials (EPA / 600/R-93/116 July 1993). Polarized Light Microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if the material can be considered or treated as non-asbestos containing. Samples will be disposed of within 30 days unless notified in writing by the client. No part of this report may be reproduced, except in full, without written permission of the laboratory. The reporting limit is 1% by weight.

Respectfully submitted,
PSI, Inc.



Approved Signatory
Glynnis Bowman

APPENDIX C
STAFF CERTIFICATES





Certificate # 7ME08087402IR007

This is to certify that

A. Bruce Reed

has on 08/08/02, in TAMPA, FL

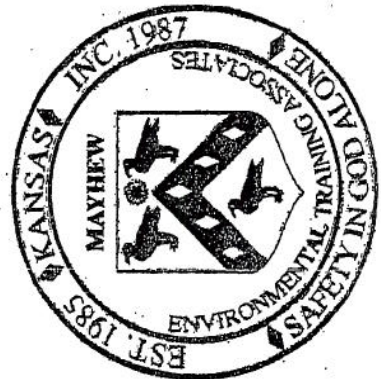
completed the requirements for asbestos accreditation under Section 206 of TSCA Title II, 15 U.S.C. 2646

AHERA Asbestos Inspector Recertification Course

as approved by the State of Florida and the U.S.E.P.A. under 40 C.F.R. 763 (AHERA)

*on 08/08/02 - 08/08/02 and passed the associated examination on 08/08/02
with a score of 70% or better*

CM = 0.5 PTS.



Melorch A. Stewart

Instructor

R. Bruce Mayhew

President

Soc. Sec #: 264-68-5316
Accreditation Expires: 08/08/03

META - P.O. Box 786 - Lawrence KS 66044 - 800-444-6382

United States Department of Commerce
National Institute of Standards and Technology

NVLAP[®]



ISO/IEC GUIDE 25:1990
ISO 9002:1987

Certificate of Accreditation

PSI
PITTSBURGH, PA

is recognized under the National Voluntary Laboratory Accreditation Program for satisfactory compliance with criteria established in Title 15, Part 285 Code of Federal Regulations. These criteria encompass the requirements of ISO/IEC Guide 25 and the relevant requirements of ISO 9002 (ANSI/ASQC Q92-1987) as suppliers of calibration or test results. Accreditation is awarded for specific services, listed on the Scope of Accreditation for:

BULK ASBESTOS FIBER ANALYSIS

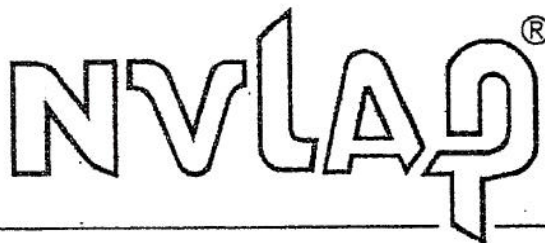
June 30, 2003

Effective through

David F. Alderman

For the National Institute of Standards and Technology
NVLAP Lab Code: 101350-0

National Institute
of Standards and Technology



National Voluntary
Laboratory Accreditation Program

ISO/IEC GUIDE 25:1990
ISO 9002:1987

Scope of Accreditation



Page: 1 of 1

BULK ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 101350-0

PSI

850 Poplar Street
Pittsburgh, PA 15220
Mr. Wayne Dickerson

Phone: 412-922-4010 x260 Fax: 412-922-4014

E-Mail: wayne.dickerson@psiusa.com

URL: <http://www.psiusa.com>

NVLAP Code

Designation

18/A01

EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk
Insulation Samples

June 30, 2003

Effective through

David F. Alderman

For the National Institute of Standards and Technology

Certifications and/or licenses to provide service in the State of Florida.

Timothy F. Caughey

AC#0700053

STATE OF FLORIDA

DEPARTMENT OF BUSINESS AND PROFESSIONAL REGULATION
ASBESTOS LICENSING UNIT

SEQ#L02111401847

DATE	BATCH NUMBER	LICENSE NBR
11/14/2002	200207143	IA0000016

The ASBESTOS CONSULTANT
Named below IS LICENSED
Under the provisions of Chapter 469 FS.
Expiration date: NOV 30, 2004

CAUGHEY, TIMOTHY F
200 10TH AVENUE
INDIAN ROCKS BEACH FL 33785

JEB BUSH
GOVERNOR

DISPLAY AS REQUIRED BY LAW

KIM BINKLEY-SEYER
SECRETARY