Pre-Renovation Asbestos Survey

January 31, 2025

7551 South State St.
Lowville

ADKOPS # 24058

ADK OPS
Environmental Consulting

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Prepared for:

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TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY

Adirondack Operations has completed a limited pre-renovation asbestos survey of portions of the building located at 7551 South State St., Lowville, NY 13367. The purpose of this survey was to identify and analyze any suspect asbestos-containing materials (ACM) that may be disturbed or damaged as part of the upcoming renovation project being planned for portions of the building.

Inspection services were performed on January 9th, 2025, by New York State Department of Labor (NYSDOL) certified building inspector Craig Kaputa (NYSDOL Certificate # 24-6T67I-SHAB). The inspection was completed in accordance with the requirements outlined in NYS Code Rule Section 56-5, Phase 1A: Asbestos Survey Planning and Design of Part 56 of Title 12 of the Official Compilation of Codes, Rules and Regulations of the State of New York.

Copies of the Building Inspector's Certificate and Adirondack Operations' Contractor License are included in Appendix D.

A total of sixty-two (62) asbestos bulk samples were collected and forwarded to AmeriSci Richmond for analysis. (Some samples were layered and separated at the laboratory). Results for these samples are included in Appendix B.

LIMITATIONS:

This report has been prepared in accordance with the scope of work outlined in Adirondack Operations proposal and should not be used as abatement design documents or specifications.

The findings and recommendations presented in this report are based on the field observations made by representatives of Adirondack Operations and information provided by the building owner.

Quantities and locations of sampled materials are approximate and must be field verified by Abatement Contractor(s) prior to bidding or commencement of abatement. If additional suspect materials, not identified in this report, are discovered during renovation or demolition activities, those materials should be sampled prior to disturbance to determine if they are asbestos containing materials.

If it is determined that additional interior materials may be impacted by the scope of the proposed project, these additional materials should be sampled by a certified asbestos inspector.

This survey included only reasonably accessible materials. Additional quantities of the materials identified may be found during renovation activities. The amounts quantified in this report are the amount which the building inspector could reasonably ascertain to be present based on visual inspection and bulk sampling. This survey did not include destructive sampling procedures and should not be used as an abatement design.

REGULATORY COMPLIANCE:

In New York State, there are multiple regulatory agencies that have jurisdiction over ACM in buildings. Asbestos survey requirements are primarily regulated by the New York State Department of Labor (NYSDOL), the New York State Department of Health (NYSDOH), the Occupational Safety and Health Administration (OSHA), and the United States Environmental Protection Agency (EPA).

The NYSDOL established Part 56 of The Official Compilation of Codes, Rules, and Regulations (cited as 12 NYCRR, Part 56) to address the proper identification, handling, removal, and disposal of ACM in buildings. Asbestos survey requirements are specified in Subpart 56-5.1"Asbestos Survey Requirements for Building/Structure Demolition, Renovation, Remodeling and Repair."

The United States Occupational Safety and Health Administration (OSHA) defines requirements for asbestos surveys and identification of ACM and presumed asbestos-containing materials (PACM) in 29 CFR 1926.1101 (k) "Communication of Hazards." Under this regulation, OSHA makes reference to conducting inspections according to 1926.1101 (k)(5)(ii)(B) and 1926.1101 (k)(5)(iii) or pursuant to the requirements of the Asbestos Hazard Emergency Response Act (AHERA) 40 CFR Part 763, Subpart E "Asbestos-Containing Materials in Schools."

AHERA is regulated by the EPA and applies to primary and secondary schools only; however, the procedures mandated under AHERA are generally considered the industry standards for surveys, as these are typically the most stringent.

EXPLANATION OF TERMS:

Homogeneous Material ID:

Is a unique ID number for a building material system (homogeneous material).

Result:

Materials are analyzed at an approved laboratory and are classified in one of the following ways:

- **NAD or Negative** = No Asbestos Detected.
- **Assumed Positive** = The material has considered to be positive without sampling either because it was in-use and could not be sampled or it was consistent with similar positive materials or is known to be a positive material.
- **Positive** = Greater than 1% asbestos (**A**sbestos **C**ontaining **M**aterial or ACM).
- **Trace** = Asbestos was detected at 1% or less. Trace materials are not considered asbestos containing materials by New York State Code Rule 56. However, OSHA (29 CFR 1926.1101) regulates all asbestos exposures including exposure which occurs while working with trace materials with less than 1% asbestos content.
- **Not Sampled, Not Suspect** = Label for materials which are not suspect per NYS Industrial Code Rule 56 but which were noted to be present during the survey.
- **NA/PS** = Not Analyzed/Positive Stop by the Laboratory when the 1st sample from a set comes back positive, the whole set is considered positive.
- **None Observed** = Means that no ACM material was observed at a specific location.
- **NA** = Not Analyzed by the Laboratory.

Quantity:

Is an estimate of the amount of a given material present in a given area.

Condition:

Materials that have been assessed were classified in this report as to be in one of the following conditions:

- **Intact:** Material is in good repair and not disturbed.
- **Damaged:** Material is disturbed, cut, scratched or damaged with less than 10% of the material damaged.
- **Significantly Damaged:** Significant damage exists where damage is evenly distributed across 10 percent or more of a homogeneous material or is localized over 25 percent of a homogeneous material.
- **Disturbed:** Material is so severely damaged that it has fallen to the floor or is hanging loose and requires immediate action as outlined in 12 NYCRR Part 56.

Friability:

Positive and Trace materials have been assessed and classified in one of the following friability categories:

- ***Friable:*** A material that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure, or is capable of being released into the air by hand pressure.
- ***Non-Friable:*** Any material that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure, and is not capable of being released into the air by hand pressure.
- ***Non-Friable Organically Bound (NOB):*** Are Non-Friable asbestos materials embedded in flexible to rigid asphalt or vinyl matrices, including but not limited to flooring materials, adhesives, mastics, asphalt, shingles, roofing materials and caulks.

2.0 ASBESTOS HOMOGENEOUS MATERIALS SUMMARY

In establishing the homogeneous area for this asbestos survey report, Adirondack Operations, LLC reviewed the building construction and made note of building renovations where apparent.

Bulk samples were collected in accordance with the requirements outlined in Section 56-5, Phase 1A: Asbestos Survey Planning and Design of Part 56 of Title 12 of the Official Compilation of Codes, Rules and Regulations of the State of New York (12 NYCRR Part 56).

OSHA recognizes materials that contain trace amounts of asbestos, and requires these materials be handled in accordance with their standard interpretation letter titled “Requirements for demolition operations involving material containing <1% asbestos”, dated August 13, 1999, a copy of this letter is included in Appendix A.

All suspect building materials identified are included in the attached homogeneous material chart. Several ACM and trace asbestos materials were identified as a result of this survey effort.

Suspect materials not in specifically identified in this survey should be assumed to be ACM until bulk sampling can be conducted to properly characterize them.

2.0 Homogeneous Materials List

Homogeneous List ID #	Material Type	Descr. / Color	Sample Location	Comments	Results
24058-001	Entryway Flooring	Green / Black	1st Floor Entryway	Found in portions of 1st floor entryway	NAD
24058-002	Plaster Wall System-Base Coat	Gray	2nd Floor and 3rd Floor	Contained animal hair only base-coat present on most wall areas, sampled separately where a skim coat had been applied.	NAD
24058-003.1	Plaster Ceiling System-Base Coat	Gray	2nd Floor	Skim coat applied with residual ceiling plaster	NAD
24058-003.2	Plaster Ceiling System-Skim Coat	White	2nd Floor		NAD
24058-004	Wall Paper	Various Colors	2nd Floor and 3rd Floor	Various colors of wall paper composited for analysis	NAD
24058-005	Exterior Joint Sealant	Gray	Exterior	Masonry to window seam sealant on exterior front windows	POSITIVE, Chrysotile 3.6%
24058-006	Exterior Joint Sealant-Rear Windows	White / Gray	Exterior	Masonry to window seam	TRACE, Anthophyllite
24058-007.1	2nd Floor Rear Room Wall Plaster System - Base Coat	Gray	2nd Floor Rear Room	Different vintage of wall plaster with skim coat applied	NAD
24058-007.2	2nd Floor Rear Room Wall Plaster System - Skim Coat	White	2nd Floor Rear Room		NAD
24058-008	Abandoned House Wiring	Black	2nd Floor and 3rd Floor	Abandoned wiring sampled where it protruded from walls	NAD
24058-009	Abandoned Knob and Tube Wiring	Black	3rd Floor	Abandoned knob and tube wiring sampled where found on 3rd floor	NAD

2.0 Homogeneous Materials List

Homogeneous List ID #	Material Type	Descr. / Color	Sample Location	Comments	Results
24058-010	Brick Mortar	Gray	2nd Floor	Homogeneous throughout, mortar between bricks	NAD
24058-011	Exterior Shingle / Felt behind Vinyl Siding	Black	Exterior	Found behind vinyl siding on rear of building	NAD
24058-012	Residual Asphaltic Tar	Black	Exterior	Residual bead of tar observed on rear exterior wall of 3rd floor patio area.	POSITIVE, Chrysotile 8.9%
24058-013	Heat Flashed Roof Sealant	Gray / Black	Exterior	Sealant observed on rear exterior wall of 3rd floor patio area where it adjoins another building to the North.	TRACE, Chrysotile
24058-014	Exterior Roofing System	Black	Exterior	Asphalt rolled roofing, felt and ice/water shield membrane	NAD

3.0 ANALYTICAL METHODOLOGIES

A total of sixty-two (62) bulk asbestos samples were forwarded to AmeriSci Richmond, for analysis to determine the presence, type and amount of asbestos in each material. Analysis was performed under NYSDOH ELAP Lab Certification # 10984 in accordance with NYSDOH ELAP Methods 198.1 (PLM), 198.6 (NOB by PLM) and 198.4 (TEM) guidelines.

A copy of the New York State Department of Health Environmental Laboratory Approval Program (NYSDOH-ELAP) Certificate of Approval for AmeriSci Richmond are provided in Appendix D, Laboratory Analysis Reports are included in Appendix B.

4.0 ASBESTOS FINDINGS

The following summary contains all asbestos containing materials (ACM-defined as containing greater than 1% asbestos). Lab reports are attached in Appendix B.

Two (2) materials were found to be asbestos containing materials (ACM), because they contain greater than 1% asbestos (ACM) are highlighted in blue in the table below:

Trace Materials are defined as those materials containing less than or equal to 1.0% asbestos and are by definition not considered Asbestos-Containing Materials and are not required to be abated by law, they are highlighted in purple in the table below.

Two (2) trace materials were identified as a result of this survey effort.

4.0 Findings

Homogeneous List ID #	Material Type	Descr. / Color	Sample Location	Comments	Results	Condition	Friability	Quantity
POSITIVE MATERIALS								
24058-005	Exterior Joint Sealant	Gray	Exterior	Masonry to window seam sealant on exterior front windows	POSITIVE, Chrysotile 3.6%	Damaged	NOB	< 1 SF
24058-012	Residual Asphaltic Tar	Black	Exterior	Residual bead of tar observed on rear exterior wall of 3rd floor patio area.	POSITIVE, Chrysotile 8.9%	Intact	NOB	< 2 SF
TRACE MATERIALS								
24058-006	Exterior Joint Sealant-Rear Windows	White / Gray	Exterior	Masonry to window seam	TRACE, Anthophyllite	Damaged	NOB	
24058-013	Heat Flashed Roof Sealant	Gray / Black	Exterior	Sealant observed on rear exterior wall of 3rd floor patio area where it adjoins another building to the North.	TRACE, Chrysotile	Intact	NOB	

4.1 PROJECT PHOTOS:

ACM Joint Sealant (24058-005) at masonry to window joints	
Plaster debris observed in cavity between 1st and 2nd floor homogeneous with sampled plaster systems	

ACM material 24058-012, Residual ACM tar on rear of building	
Trace heat flashed roof sealant (Material 24058-013)	

APPENDIX A: 12 NYCRR PART 56-5 & OSHA TRACE MATERIALS GUIDANCE LETTER

SUBPART 56-5
PHASE IA: ASBESTOS SURVEY PLANNING AND DESIGN

56-5.1 Asbestos Survey Requirements for Building/Structure Demolition, Renovation, Remodeling and Repair

(a) **Asbestos Survey Required.** An owner or an owner's agent, except the owner of one and two-family dwellings who contracts for, but does not direct or control the work, shall cause to be conducted, an asbestos survey completed by a licensed asbestos contractor using inspectors certified in compliance with Section 56-3.2(d), to determine whether or not the building or structure, or portion(s) thereof to be demolished, renovated, remodeled, or have repair work, contains ACM, PACM or asbestos material. This asbestos survey shall be completed and submitted as indicated in Subdivision (g) of this Section, prior to commencing work. All such asbestos surveys shall be conducted in conformance with the requirements of Subdivision (e) of this Section.

(b) **Exemptions To Asbestos Survey Requirements**: The asbestos survey required by this Subdivision (a) of this Section shall not be required for the following classes of buildings or structures:

(1) an agricultural building;

(2) buildings or structures for which original construction commenced on or after January 1, 1974;

(3) A structure certified in writing to be structurally unsound by a licensed Professional Engineer, Registered Architect, Building Inspector, Fire Inspector or other official of competent jurisdiction. (See Section 56-11.5)

(c) **Building/Structure Demolition**. If a building/structure asbestos survey is not required or performed per Subdivision (b) of this Section, and the building/structure is certified to be unsound or slated for contracted demolition, the building/structure shall be assumed to contain asbestos, and shall be demolished per this Part, unless the building/structure is adequately certified to be free of asbestos containing material. Acceptable documentation for certification shall be a previous thorough building/structure asbestos survey, abatement records or other documentation acceptable to the Commissioner or his or her representative.

(d) **Responsibility To Comply.** No exemption to the requirement to conduct an asbestos survey shall exempt any person, asbestos contractor, property owner or business entity from the inspection or asbestos survey requirements of EPA, OSHA, and any other applicable section of this Part.

(e) **Building/Structure Asbestos Survey Requirements.** The asbestos survey shall include a thorough inspection for and identification of all PACM, suspect miscellaneous ACM, or asbestos material throughout the building/structure or portion thereof to be demolished, renovated, remodeled, or to have repair work. The required inspection shall be performed by a certified asbestos inspector, and, at a minimum, shall include identification of PACM, suspect miscellaneous ACM or asbestos material by all of the following methods:

(1) The review of building/structure plans and records, if available, for references to asbestos, ACM, PACM, suspect miscellaneous ACM or asbestos material used in construction, renovation or repair; and

(2) A visual inspection for PACM and suspect miscellaneous ACM throughout the building/structure or portion thereof to be demolished, renovated, remodeled, or repaired. For the purpose of this Part, all PACM and suspect miscellaneous ACM visually assessed shall be treated and handled as ACM and shall be assumed to be ACM, unless bulk sampling is conducted as per this Section, standard EPA and OSHA accepted methods, including multi-layered systems sampling protocols; the subsequent analyses are performed by a laboratory that meets the requirements of Section 56-4.2 of this Part; and the analyses satisfies both ELAP and federal requirements, including multi-layered sample analyses, to document non-asbestos containing material.

(f) **Building/Structure Asbestos Survey Information.**

(1) The asbestos survey shall, at a minimum, identify and assess with due diligence, the locations, quantities, friability and conditions of all types of installations at the affected portion of the building/structure relative to the ACM, suspect miscellaneous ACM, PACM or asbestos material contained therein. The following list is not inclusive of all types of ACMs, it only summarizes typical ACMs. The certified asbestos inspector is responsible for identification and assessment of all types ACM, PACM, suspect miscellaneous ACM and asbestos material within the affected portion of the building/structure:

(i) PACM

(a) **Surfacing Treatments:**

(1) Fireproofing;

(2) Acoustical Plaster;

(3) Finish Plasters; and

(4) Skim Coats of Joint Compound.

(b) **Thermal System Insulation:**

(1) Equipment Insulation;

(2) Boiler, Breeching, Duct, or Tank Insulation, Cement or Mortar Used for Boilers and Refractory Brick;

(3) Piping and Fitting Insulations including but not limited to, Wrapped Paper, Aircell, Millboard, Rope, Cork, Preformed Plaster, Job Molded Plaster and coverings over fibrous glass insulation.

(ii) SUSPECT MISCELLANEOUS ACM

(a) **Roofing and Siding Miscellaneous Materials:**

(1) Insulation Board;

(2) Vapor Barriers;

(3) Coatings;

(4) Non-Metallic or Non-Wood Roof Decking;

(5) Felts;

(6) Cementitious Board (Transite);

(7) Flashing;

(8) Shingles; and

(9) Galbestos.

(b) **Other Miscellaneous Materials:**

(1) Dust and Debris;

(2) Floor Tile;

(3) Cove Base;

(4) Floor Leveler Compound;

(5) Ceiling Tile;

(6) Vermiculite Insulation;

(7) Gaskets, Seals, Sealants (including for condensate control);

(8) Vibration Isolators;

(9) Laboratory Tables and Hoods;

(10) Chalkboards;

(11) Pipe Penetration Packing or Other Firestopping Materials;

(12) Cementitious Pipe (Transite);

(13) Cementitious Board (Transite);

(14) Electrical Wire Insulation;

(15) Fire Curtains;

(16) Fire Blankets;

(17) Fire Doors;

(18) Brakes and Clutches;

(19) Mastics, Adhesives and Glues;

(20) Caulks;

(21) Sheet Flooring (Linoleum);

(22) Wallpaper;

(23) Drywall;

(24) Plasterboard;

(25) Spackling/Joint Compound;

(26) Textured Paint;

(27) Grout;

(28) Glazing Compound;

(29) Terrazzo; and

(30) Boiler Rope.

(2) All ACM, PACM, suspect miscellaneous ACM, or asbestos material reported under Paragraph (1) of this Subdivision shall include the location of the materials, an estimate of the quantities, types, friability and condition of the identified materials to be treated and handled as ACM. For the purpose of this Part, all PACM and suspect miscellaneous ACM visually assessed shall be treated and handled as ACM and shall be assumed to be ACM, unless bulk sampling is conducted as per this Section, standard EPA and OSHA accepted methods, including multi-layered systems sampling protocols; the subsequent analyses are performed by a laboratory that meets the requirements of Section 56-4.2 of this Part; and the analyses satisfies both ELAP and federal requirements, including multi-layered sample analyses, to document non-asbestos containing material.

(3) The building/structure asbestos survey shall also include the building/structure name, address, the building/structure owner's name and address, the name and address of the owner's agent, the name of the firm performing the asbestos survey and a copy of the firm's current asbestos handling license, the names of the certified inspector(s) performing the survey and a copy of the current asbestos handling certificate for each inspector utilized, the dates of the asbestos survey, a listing of homogeneous areas identifying which ones are ACM, all laboratory analyses reports for bulk samples collected, and copies of the appropriate certifications for the laboratory used for analysis of samples taken during the asbestos survey.

(g) **Transmittal of Building/Structure Asbestos Survey Information.** One (1) copy of the results of the building/structure asbestos survey shall be immediately transmitted by the building/structure owner as follows:

(1) One (1) copy of the completed asbestos survey shall be sent by the owner or their agent to the local government entity charged with issuing a permit for such demolition, renovation, remodeling or repair work under applicable State or local laws.

(2) The completed asbestos survey for controlled demolition (as per Subpart 56-11.5) or pre-demolition asbestos projects shall also be submitted to the appropriate Asbestos Control Bureau district office.

(3) The completed asbestos survey shall be kept on the construction site with the asbestos notification and variance, if required, throughout the duration of the asbestos project and any associated demolition, renovation, remodeling or repair project.

(h) **Removal Required.** If the building/structure asbestos survey finds that the portion of the building/structure to be demolished, renovated, remodeled, or have repair work contains ACM, PACM, suspect miscellaneous ACM assumed to be

ACM, or asbestos material, which is impacted by the work, the owner or the owner's agent shall conduct, or cause to have conducted, asbestos removal performed by a licensed asbestos abatement contractor in conformance with all standards set forth in this Part. All ACM, PACM, suspect miscellaneous ACM assumed to be ACM, or asbestos material impacted by the demolition, renovation, remodeling or repair project shall be removed as per this Part, prior to access or disturbance by other uncertified trades or personnel. No demolition, renovation, remodeling or repair work shall be commenced by any owner or the owner's agent prior to the completion of the asbestos abatement in accordance with the notification requirements of this Part. For multi-phased work, the access restriction for uncertified trades or personnel applies to each intermediate portion of the entire project. Upon completion of the intermediate portion of the asbestos project, other trades or personnel may access that portion of the work site. For demolition projects that are exempt from asbestos survey requirements due to being structurally unsound, the demolition is considered an asbestos project and shall proceed as per Section 56-11.5.

(1) All building/structure owners and asbestos abatement contractors on a demolition, renovation, remodeling, or repair project, which includes work covered by this Part, shall inform all trades on the work site about PACM, ACM, asbestos material and suspect miscellaneous ACM assumed to be ACM at the work site.

(i) **Bidding.** Bids may be advertised and contracts awarded for demolition, remodeling, renovation, or repair work, but no work on the current intermediate portion of the project shall commence on the demolition, renovation, remodeling or repair work by any owner or agent prior to completion of all necessary asbestos abatement work for the current intermediate portion of the entire project, in conformance with all standards set forth in this Part.

(j) **Unidentified and Unassessed Asbestos.** When any construction activity, such as demolition, remodeling, renovation or repair work, reveals PACM or suspect miscellaneous ACM that has not been identified by the asbestos survey per this Part, or has not been identified by other inspections as per current OSHA or EPA requirements, all activities shall cease in the area where the PACM or suspect miscellaneous ACM is found and the Asbestos Control Bureau shall be notified by telephone by the building/structure owner or their representative, followed with a written notice in accordance with the notification requirements of this Part. Unassessed PACM or suspect miscellaneous ACM shall be treated and handled as ACM and assumed to be ACM, unless proven otherwise by standard EPA and OSHA accepted methods, including multi-layered systems sampling protocols; subsequent analyses performed by a laboratory that meets the requirements of Section 56-4.2 of this Part; and the analyses satisfies both NYS ELAP and federal requirements, including multi-layered sample analyses, to document non-asbestos containing material.

• **Standard Number:** 1926.1101(b); 1926.1101(f); 1926.1101(g); 1926.1101(k); 1926.1101(n)

August 13, 1999

Walter Chun, M.S., CSP, CHSP, CECM
OSHCON, INC.
P.O. Box 25850
Honolulu, Hawaii 96825-0850

Dear Mr. Chun:

This is in response to your October 9, 1998 request for clarification of the Occupational Safety and Health Administration's (OSHA's) Construction Industry Asbestos Standard, 29 CFR 1926.1101. We apologize for the delay in our reply.

You note that according to 29 CFR 1926.1101(a)(1), the Construction Industry Asbestos Standard regulates demolition or salvage of structures where asbestos is present and that 29 CFR 1926.1101(b) defines asbestos-containing material (ACM) as any material containing >1% asbestos. You ask that we clarify the applicability of the standard to a demolition operation involving material containing <1% asbestos.

If the demolition operation would involve material containing >1% asbestos it would be Class I or II asbestos work, since Class I or Class II asbestos work is removal of ACM, and according to 29 CFR 1926.1101(b), "removal" includes demolition operations. Since the demolition operation involves material containing <1% asbestos, the work is not a designated class of asbestos work, as you correctly note in your letter. Therefore, only 29 CFR 1926.1101(g)(1)(ii) and (iii), as well as those recordkeeping requirements under 29 CFR 1926.1101(n) that are associated with the negative exposure assessment, apply so long as neither asbestos permissible exposure limit (PEL) is exceeded or might be exceeded. 29 CFR 1926.1101(g)(1)(ii) requires:

"Wet methods, or wetting agents, to control employee exposures during asbestos handling, mixing, removal, cutting, application, and cleanup, except where employers demonstrate that the use of wet methods is infeasible due to for example, the creation of electrical hazards, equipment malfunction, and, in roofing, except as provide in paragraph (g)(8)(ii) of this section;"

and 29 CFR 1926.1101(g)(1)(iii) requires:

"Prompt clean-up and disposal of wastes and debris contaminated with asbestos in leak-tight containers except in roofing operations, where the procedures specified in paragraph (g)(8)(ii) of this section apply."

On the other hand, if at least one of the asbestos PELs is exceeded or might be exceeded, then all the requirements that are not strictly reserved as work practice requirements for Class I, II, III, or IV asbestos work apply or might apply. An exception would be if there were not frequent enough exposures above the asbestos PELs to activate a specific requirement. For example, an employer is not required to make a medical surveillance program available to an employee who is not engaged in Class I, II, or III work or exposed at or above a permissible exposure limit for a combined total of 30 or more days per year.

An example of the many requirements that apply when either one of the asbestos PELs is exceeded is 29 CFR 1926.1101(j)(4) which states, "The employer shall ensure that employees do not smoke in work areas where they are occupationally exposed to asbestos because of activities in that work area." This requirement applies wherever the employer must establish an asbestos-associated regulated area. Such a regulated area must be established where Class I, II, or III asbestos work is done or where at least one of the asbestos PELs is exceeded.

You ask if a demolition project involving only materials containing <1% asbestos requires an initial negative exposure assessment. In order to avoid the need to comply with the elements of the standard that are applicable when either asbestos PEL is exceeded, the contractor conducting the demolition project must produce an initial negative exposure assessment for his/her employees.

There are three potential approaches provided under 29 CFR 1926.1101(f)(2) for producing a negative exposure assessment. These are the use of objective data, previous air monitoring results, or current air monitoring results. If the contractor cannot produce a negative exposure assessment with objective data or previous air

monitoring results, then the contractor must conduct asbestos exposure monitoring. Until the contractor is able to produce a negative exposure assessment for his/her employees, the contractor must comply with the elements of the standard that are applicable when either asbestos PEL is exceeded.

As to your inquiry into the protective equipment and training that must be provided to employees who are working while the contractor seeks to produce a negative exposure assessment, the contractor must provide those employees with the protective clothing described in 29 CFR 1926.1101(i). At a minimum, half-mask air-purifying respirators, other than disposable respirators, equipped with high efficiency filters are required. And, the contractor must provide those employees training that meets the mandates of 29 CFR 1926.1101(k)(9)(viii).

You also ask about the procedures for determining the asbestos content of material. Specifically, you ask if OSHA recognizes the point counting method for determining the asbestos content. Yes, OSHA considers the point counting method to be acceptable, but OSHA does not require that it be used. Polarized light microscopy (PLM) is the root method used for identification of asbestos. Point counting is one of the techniques used to quantify the amount of asbestos present in a sample on which PLM has already been performed.

The last issues you raise concern 29 CFR 1926.1101(k), Communication of hazards. You ask whether the building/facility owner must provide information regarding the presence of building or facility materials that contain <1% asbestos. The owner is not required to provide this information. The owner is required to provide information only about the presence of materials containing greater than or equal to 1% asbestos. Nonetheless, a contractor receiving notification from a building owner that all materials in the building are non-ACM may not conclude from this communication that the materials present no potential asbestos exposure hazard for the contractor's employees. If the materials were tested for asbestos in accordance with the testing requirements in 29 CFR 1926.1101, then the contractor is not required to observe the standard's requirements for Class I, II, III, or IV asbestos work when tasks involving the materials are performed. However, if the materials contain some amount of asbestos that is less than or equal to 1%, the contractor must observe the asbestos PELs and 29 CFR 1926.1101(g)(1)(ii) and (iii). Therefore, the contractor has an implied obligation to determine if the materials contain some asbestos. The contractor must exercise due diligence to identify the presence of asbestos in materials.

An investigation of whether any of the materials are prone to contain some amount of asbestos which is less than or equal to 1% would be one example of action the employer must take in order to meet the test of exercising due diligence. If the contractor determines that the materials contain some asbestos, then the contractor must determine if compliance with 29 CFR 1926.1101(g)(1)(ii) and (iii) is sufficient for preventing exposures above the asbestos PELs. Engineering and work practice controls must be used whenever asbestos exposures above either PEL would occur without their use. If feasible engineering and work practice controls are not adequate to prevent exposures above an asbestos PEL, respiratory protection must be used to supplement the controls.

You note that 29 CFR 1926.1101(k) sets out the responsibilities of employers for providing employees information on the presence of asbestos. You ask if employees performing demolition work involving materials containing <1% asbestos are covered by these employer responsibilities. The employer responsibilities to which you refer are presented at 29 CFR 1926.1101(k)(3). The requirements at 29 CFR 1926.1101(k)(3) are not applicable to employees doing demolition work involving material containing <1% asbestos because the scope of the requirements is limited to ACM and PACM. However, if the employee asbestos exposure levels exceed one or both of the PELs, the employees will be informed of the presence of asbestos because the employer must establish a regulated area and implement procedures that comply with 29 CFR 1926.1101(e).

You asked if there are other standards that can be used to protect employees from an asbestos health hazard presented by material containing <1% asbestos. The shipyard employment standard for asbestos, 29 CFR 1915.1001; the General Industry standard for asbestos, 29 CFR 1910.1001; and 29 CFR 1926.1101 are the only OSHA standards for regulating the asbestos health hazard presented by material containing <1% asbestos. The Hazard Communication Standard, 29 CFR 1910.1200, does not apply to material containing <1% asbestos.

Thank you for your interest in occupational safety and health. We hope you find this information helpful. Please be aware that OSHA's enforcement guidance is subject to periodic review and clarification, amplification, or correction. Such guidance could also be affected by subsequent rulemaking. In the future, should you wish to verify that the guidance provided herein remains current, you may consult OSHA's website at http://www.osha.gov. If you have any further questions, please feel free to contact OSHA's Office of Health Compliance Assistance at (202) 693-2190.

Sincerely,

Richard E. Fairfax, Director
Directorate of Compliance Programs

Standard Interpretations - Table of Contents

U.S. Department of Labor | Occupational Safety & Health Administration | 200 Constitution Ave., NW, Washington, DC 20210
Telephone: 800-321-OSHA (6742) | TTY: 877-889-5627
www.OSHA.gov

APPENDIX B: LABORATORY RESULTS

AmeriSci Richmond
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PLM Bulk Asbestos Report

Adirondack Operations
Attn: Mary Anne Kaputa
PO Box 393
9541 Belfort Road
Croghan, NY 13327

Date Received 1/16/2025 **AmeriSci Job #** 125011494
Date Examined 01/22/25 **P.O. #**
ELAP # 10984 **Page** 1 **of** 7
RE: 24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-001-A 1	125011494-01	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*
Location: Entryway Flooring System **Analyst Description:** Green, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 5.8% **Comment:** Heat Sensitive (organic): 62.1%; Acid Soluble (inorganic): 32.1%; Inert (Non-asbestos): 5.8%				
24058-001-B 1	125011494-02	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*
Location: Entryway Flooring System **Analyst Description:** Green, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 4.4% **Comment:** Heat Sensitive (organic): 60.3%; Acid Soluble (inorganic): 35.3%; Inert (Non-asbestos): 4.4%				
24058-002-A 2	125011494-03	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: Plaster - Walls - Base Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				
24058-002-B 2	125011494-04	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: Plaster - Walls - Base Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				
24058-002-C 2	125011494-05	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: Plaster - Walls - Base Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-003-A 3 **Location:** Plaster - Ceiling - **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Base Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 3.0%, Non-fibrous 97%	125011494-06.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-003-A 3 **Location:** Plaster - Ceiling - **Analyst Description:** White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Non-fibrous 100%	125011494-06.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-003-B 3 **Location:** Plaster L1 - Skim Coat **Analyst Description:** Off-White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 2.0%, Non-fibrous 98%	125011494-07.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-003-B 3 **Location:** Plaster L1 - Skim Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Base Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%	125011494-07.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-003-C 3 **Location:** Plaster L2 - Base Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%	125011494-08.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-003-C 3 **Location:** Plaster L2 - Base Coat **Analyst Description:** White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Non-fibrous 100%	125011494-08.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
24058-004-A 4 **Location:** Wall Paper - Various Colors **Analyst Description:** Multi-Colored, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 100%	125011494-09	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-004-B 4	125011494-10	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: Wall Paper - Various Colors **Analyst Description:** Multi-Colored, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 100%				
24058-005-A 5	125011494-11	***Yes***	3.6% (NOB by NYS ELAP 198.6) by Daisha Addison on 01/22/25	
Location: Ext Joint Sealant - Front Windows - Masonry To Trim **Analyst Description:** Gray, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** Chrysotile 3.6% **Other Material:** Fibrous glass 6.3%, Non-fibrous 10% **Comment:** Heat Sensitive (organic): 19.0%; Acid Soluble (inorganic): 61.1%; Inert (Non-asbestos): 16.3%				
24058-005-B 5	125011494-12		NA/PS	
Location: Ext Joint Sealant - Front Windows - Masonry To Trim **Analyst Description:** Bulk Material **Asbestos Types:** **Other Material:** **Comment:** Heat Sensitive (organic): 22.0%; Acid Soluble (inorganic): 55.1%; Inert (Non-asbestos): 22.8%				
24058-006-A 6	125011494-13	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*
Location: Ext Joint Sealant Rear Windows - Masonry To Trim **Analyst Description:** White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Wollastonite 4.0%, Non-fibrous 6.8% **Comment:** Heat Sensitive (organic): 12.8%; Acid Soluble (inorganic): 76.3%; Inert (Non-asbestos): 10.8%				
24058-006-B 6	125011494-14	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*
Location: Ext Joint Sealant Rear Windows - Masonry To Trim **Analyst Description:** White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Wollastonite 4.0%, Non-fibrous 3.9% **Comment:** Heat Sensitive (organic): 14.8%; Acid Soluble (inorganic): 77.2%; Inert (Non-asbestos): 7.9%				
24058-007-A 7	125011494-15.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Base Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-007-A 7	125011494-15.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster **Analyst Description:** White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Non-fibrous 100%				
24058-007-B 7	125011494-16.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster L1 - Skim Coat **Analyst Description:** Off-White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 3.0%, Non-fibrous 97%				
24058-007-B 7	125011494-16.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster L1 - Skim Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Base Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				
24058-007-C 7	125011494-17.1	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster L2 - Base Coat **Analyst Description:** Gray, Heterogeneous, Non-Fibrous, Base Coat (Plaster) **Asbestos Types:** **Other Material:** Animal hair 4.0%, Non-fibrous 96%				
24058-007-C 7	125011494-17.2	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	
Location: 2nd Floor - Rear Room - Wall Plaster L2 - Base Coat **Analyst Description:** White, Heterogeneous, Non-Fibrous, Skim Coat (Plaster) **Asbestos Types:** **Other Material:** Non-fibrous 100%				
24058-008-A 8	125011494-18	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*
Location: Abandoned Wiring - House **Analyst Description:** Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 34% **Comment:** Heat Sensitive (organic): 53.0%; Acid Soluble (inorganic): 12.2%; Inert (Non-asbestos): 34.8%				

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-008-B 8	125011494-19	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Abandoned Wiring - House
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 34%
Comment: Heat Sensitive (organic): 54.2%; Acid Soluble (inorganic): 11.0%; Inert (Non-asbestos): 34.8%

24058-009-A 9	125011494-20	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Abandoned Wiring - Knob & Tube
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 2.6%
Comment: Heat Sensitive (organic): 61.1%; Acid Soluble (inorganic): 36.3%; Inert (Non-asbestos): 2.6%

24058-009-B 9	125011494-21	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Abandoned Wiring - Knob & Tube
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 3.2%
Comment: Heat Sensitive (organic): 60.3%; Acid Soluble (inorganic): 36.5%; Inert (Non-asbestos): 3.2%

24058-010-A 10	125011494-22	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	

Location: Brick Mortar - Gray
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 100%

24058-010-B 10	125011494-23	***No***	NAD (EPA 600/M4-82-020) by Daisha Addison on 01/22/25	

Location: Brick Mortar - Gray
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 100%

24058-011-A 11	125011494-24	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Exterior Felt & Shingle Behind Vinyl Siding
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Fibrous glass 6.4%
Comment: Heat Sensitive (organic): 56.0%; Acid Soluble (inorganic): 37.6%; Inert (Non-asbestos): 6.4%

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-011-B 11	125011494-25	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Exterior Felt & Shingle Behind Vinyl Siding
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Fibrous glass 18%
Comment: Heat Sensitive (organic): 48.4%; Acid Soluble (inorganic): 33.7%; Inert (Non-asbestos): 18.0%

24058-012-A 12	125011494-26	***Yes***	8.9% (NOB by NYS ELAP 198.6) by Daisha Addison on 01/22/25	

Location: Residual Tar On Ext Wall
Analyst Description: Black, Heterogeneous, Fibrous, Bulk Material
Asbestos Types: Chrysotile 8.9%
Other Material: Non-fibrous 2.2%
Comment: Heat Sensitive (organic): 72.7%; Acid Soluble (inorganic): 16.2%; Inert (Non-asbestos): 2.2%

24058-012-B 12	125011494-27		NA/PS	

Location: Residual Tar On Ext Wall
Analyst Description: Bulk Material
Asbestos Types:
Other Material:
Comment: Heat Sensitive (organic): 34.4%; Acid Soluble (inorganic): 29.5%; Inert (Non-asbestos): 36.1%

24058-013-A 13	125011494-28	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Heat Flashed Roof Sealant Gray - Silver
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 14%
Comment: Heat Sensitive (organic): 68.5%; Acid Soluble (inorganic): 17.2%; Inert (Non-asbestos): 14.2%

24058-013-B 13	125011494-29	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Heat Flashed Roof Sealant Gray - Silver
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Non-fibrous 6.1%
Comment: Heat Sensitive (organic): 69.9%; Acid Soluble (inorganic): 24.0%; Inert (Non-asbestos): 6.1%

24058-014-A 14	125011494-30	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Roofing - Asphalt Rolled Roofing Felt, Ice & Water Shield
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Fibrous glass 8.9%
Comment: Heat Sensitive (organic): 69.1%; Acid Soluble (inorganic): 21.9%; Inert (Non-asbestos): 8.9%

See Reporting notes on last page

PLM Bulk Asbestos Report

24058; Naturally Lewis Office Building; 7551 South State St, Lowville
(Report Amended 1/23/2025)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos	Notes
24058-014-B 14	125011494-31	***No***	Inconclusive - NAD (NOB by EPA 600/M4-82-020) by Daisha Addison on 01/22/25	*1*

Location: Roofing - Asphalt Rolled Roofing Felt, Ice & Water Shield
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material
Asbestos Types:
Other Material: Fibrous glass 0.6%
Comment: Heat Sensitive (organic): 81.7%; Acid Soluble (inorganic): 17.7%; Inert (Non-asbestos): 0.6%

Reporting Notes:

(1) NAD results by NYS 198.6 are inconclusive and are not considered non-ACM

Analyzed by: Daisha Addison
Date: 1/22/2025

Reviewed by: Glenn F. Massey

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Meiji, Model MT 6120 microscope, Serial #2200363, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

Table I
Summary of Bulk Asbestos Analysis Results by NYS ELAP 198.4

24058; Naturally Lewis Office Building; 7551 South State St, Lowville (Report Amended 1/23/2025)

AmeriSci Sample #	Client Sample#	HG Area	NOB Sample Weight (gram)	NOB Heat Sensitive Organic %	NOB Acid Soluble Inorganic %	NOB Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
01	24058-001-A	1	0.349	62.1	32.1	5.8	NAD	NAD
Location:	Entryway Flooring System; Bulk Material							
02	24058-001-B	1	0.145	60.3	35.3	4.4	NAD	NAD
Location:	Entryway Flooring System; Bulk Material							
03	24058-002-A	2	----	----	----	----	NAD	NA
Location:	Plaster - Walls - Base Coat; Bulk Material							
04	24058-002-B	2	----	----	----	----	NAD	NA
Location:	Plaster - Walls - Base Coat; Bulk Material							
05	24058-002-C	2	----	----	----	----	NAD	NA
Location:	Plaster - Walls - Base Coat; Bulk Material							
06.1	24058-003-A	3	----	----	----	----	NAD	NA
Location:	Plaster - Ceiling - ; Base Coat (Plaster)							
06.2	24058-003-A	3	----	----	----	----	NAD	NA
Location:	Plaster - Ceiling - ; Skim Coat (Plaster)							
07.1	24058-003-B	3	----	----	----	----	NAD	NA
Location:	Plaster L1 - Skim Coat; Skim Coat (Plaster)							
07.2	24058-003-B	3	----	----	----	----	NAD	NA
Location:	Plaster L1 - Skim Coat; Base Coat (Plaster)							
08.1	24058-003-C	3	----	----	----	----	NAD	NA
Location:	Plaster L2 - Base Coat; Bulk Material							
08.2	24058-003-C	3	----	----	----	----	NAD	NA
Location:	Plaster L2 - Base Coat; Skim Coat (Plaster)							
09	24058-004-A	4	----	----	----	----	NAD	NA
Location:	Wall Paper - Various Colors; Bulk Material							
10	24058-004-B	4	----	----	----	----	NAD	NA
Location:	Wall Paper - Various Colors; Bulk Material							
11	24058-005-A	5	0.143	19.0	61.1	16.3	Chrysotile 3.6	NA
Location:	Ext Joint Sealant - Front Windows - Masonry To Trim; Bulk Material							
12	24058-005-B	5	0.285	22.0	55.1	22.8	NA/PS	NA
Location:	Ext Joint Sealant - Front Windows - Masonry To Trim; Bulk Material							
13	24058-006-A	6	0.154	12.8	76.3	10.7	NAD	Anthophyllite Trace
Location:	Ext Joint Sealant Rear Windows - Masonry To Trim; Bulk Material							

See Reporting notes on last page

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Summary of Bulk Asbestos Analysis Results by NYS ELAP 198.4

24058; Naturally Lewis Office Building; 7551 South State St, Lowville (Report Amended 1/23/2025)

AmeriSci Sample #	Client Sample#	HG Area	NOB Sample Weight (gram)	NOB Heat Sensitive Organic %	NOB Acid Soluble Inorganic %	NOB Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
14	24058-006-B	6	0.121	14.8	77.2	7.8	NAD	Anthophyllite Trace
Location: Ext Joint Sealant Rear Windows - Masonry To Trim; Bulk Material								
15.1	24058-007-A	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster ; Base Coat (Plaster)								
15.2	24058-007-A	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster ; Skim Coat (Plaster)								
16.1	24058-007-B	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster L1 - Skim Coat; Skim Coat (Plaster)								
16.2	24058-007-B	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster L1 - Skim Coat; Base Coat (Plaster)								
17.1	24058-007-C	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster L2 - Base Coat; Base Coat (Plaster)								
17.2	24058-007-C	7	----	----	----	----	NAD	NA
Location: 2nd Floor - Rear Room - Wall Plaster L2 - Base Coat; Skim Coat (Plaster)								
18	24058-008-A	8	0.298	53.0	12.2	34.8	NAD	NAD
Location: Abandoned Wiring - House; Bulk Material								
19	24058-008-B	8	0.332	54.2	11.0	34.8	NAD	NAD
Location: Abandoned Wiring - House; Bulk Material								
20	24058-009-A	9	0.279	61.1	36.3	2.6	NAD	NAD
Location: Abandoned Wiring - Knob & Tube; Bulk Material								
21	24058-009-B	9	0.284	60.3	36.5	3.2	NAD	NAD
Location: Abandoned Wiring - Knob & Tube; Bulk Material								
22	24058-010-A	10	----	----	----	----	NAD	NA
Location: Brick Mortar - Gray; Bulk Material								
23	24058-010-B	10	----	----	----	----	NAD	NA
Location: Brick Mortar - Gray; Bulk Material								
24	24058-011-A	11	0.169	56.0	37.6	6.4	NAD	NAD
Location: Exterior Felt & Shingle Behind Vinyl Siding; Bulk Material								
25	24058-011-B	11	0.207	48.4	33.7	18.0	NAD	NAD
Location: Exterior Felt & Shingle Behind Vinyl Siding; Bulk Material								
26	24058-012-A	12	0.098	72.7	16.2	2.2	Chrysotile 8.9	NA
Location: Residual Tar On Ext Wall; Bulk Material								

See Reporting notes on last page

Table I
Summary of Bulk Asbestos Analysis Results by NYS ELAP 198.4

24058; Naturally Lewis Office Building; 7551 South State St, Lowville (Report Amended 1/23/2025)

AmeriSci Sample #	Client Sample#	HG Area	NOB Sample Weight (gram)	NOB Heat Sensitive Organic %	NOB Acid Soluble Inorganic %	NOB Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
27	24058-012-B	12	0.188	34.4	29.5	36.1	NA/PS	NA
Location:	Residual Tar On Ext Wall; Bulk Material							
28	24058-013-A	13	0.150	68.5	17.2	14.2	NAD	NAD
Location:	Heat Flashed Roof Sealant Gray - Silver; Bulk Material							
29	24058-013-B	13	0.069	69.9	24.0	6.0	NAD	Chrysotile Trace
Location:	Heat Flashed Roof Sealant Gray - Silver; Bulk Material							
30	24058-014-A	14	0.335	69.1	21.9	8.9	NAD	NAD
Location:	Roofing - Asphalt Rolled Roofing Felt, Ice & Water Shield; Bulk Material							
31	24058-014-B	14	0.219	81.7	17.7	0.6	NAD	NAD
Location:	Roofing - Asphalt Rolled Roofing Felt, Ice & Water Shield; Bulk Material							

Analyzed by: Cory M. Parnell

Reviewed by: Glenn F. Massey

Date: 1/22/2025

Semi-Quantitative Analysis: NAD = no asbestos detected; NA = not analyzed; NA/PS = not analyzed due to positive stop; Trace = <1%; PLM analysis by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) or NY ELAP 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NY ELAP Lab # 10984); TEM prep by EPA 600/R-93/116 Section 2.3 (analysis by Section 2.5, not covered by NVLAP Bulk accreditation); or NY ELAP 198.4 for New York NOB samples (NY ELAP Lab # 10984). Analysis using Jeol, Model JEM-100CX II microscope, Serial #156147-247. ** Warning Notes: Consider PLM fiber diameter limitation, only TEM will resolve fibers <0.25 micrometers in diameter. TEM bulk analysis is representative of the fine grained matrix material and may not be representative of non-uniformly dispersed debris, soils or other heterogeneous materials for which a combination PLM/TEM evaluation is recommended; Quantitation for beginning weights of <0.1 grams should be considered as qualitative only.

AMERISCI
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CHAIN OF CUSTODY RECORD

AMERISCI RICHMOND Job No.: 125011494

AMERISCI RICHMOND
13635 GENITO ROAD
MIDLOTHIAN, VA 23112
PHONE: (804) 763-1200
FAX: (804) 763-1800
TOLL FREE: (800) 476-5227
www.amerisci.com

NAME:	ADDRESS:	P.O.#:
Adirondack Operations	9541 Belfort Road Croghan, NY 13327	SPECIAL INSTRUCTIONS: See individual instructions below

PROJECT INFORMATION	ANALYSIS TYPE	TURNAROUND TIME (X)							AIR FILTER INFORMATION:	
		6-8 HR	12 HR	24 HR	48 HR	72 HR	5 DAY	OTHER		
JOB NAME: Naturally Lewis Office Building	TEM/AHERA								MCE	
	TEM/LEVEL II								PC	
JOB NO.: 24058	TEM/7402								25 mm	
ADKOPS# ~~24048~~	TEM/BULK						X		37 mm	
JOB MANAGER: Craig Kaputa	TEM/DUST								0.45 um	
	TEM/WATER								0.80 um	
JOB DESCRIPTION: 7551 South State St., Lowville	PLM						X		OTHER:	
	PCM									
	OTHER:									

RESULTS TO: Adirondack Operations INVOICE TO: Adirondack Operations
RETURN SAMPLES: YES_____ NO X
EMAIL RESULTS: (Y) / N EMAIL ADDRESS: adirondackoperations@gmail.com
PHONE: 315 834-2356
WRITTEN REPORT TO: Adirondack Operations Croghan, NY 13327
FAX:
COMMENTS: NA/PS by layer or sample
SITE FAX:
PAGER/CELL:

LAB ID	SAMPLE ID	SAMPLE LOCATION	START TIME	STOP TIME	TOTAL TIME	X	LITERS /MIN.	=	TOTAL VOLUME	DATE COLLECTED
	24058-001-A	ENTRYWAY FLOORING SYSTEM								
	24058-001-B									
	24058-002-A	PLASTER - WALLS - BASE COAT								
	24058-002-B									
	24058-002-C									
	24058-003-A	PLASTER CEILING -								
	24058-003-B	L1 - SKIM COAT								
	24058-003-C	L2 - BASE COAT								
	24058-004-A	WALL PAPER - VARIOUS COLORS								
	24058-004-B									
	24058-005-A	EXT. JOINT SEALANT -								
	24058-005-B	FRONT WINDOWS - MISSING TRIM								
	24058-006-A	EXT. JOINT SEALANT								
	24058-006-B	REAR WINDOWS - MISSING TRIM								
	24058-007-A	2ND FLOOR - REAR ROOM - WALL								
	24058-007-B	PLASTER W/ L1 - SKIM COAT								
	24058-007-C	L2 - BASE COAT								

SAMPLED BY:	DATE/TIME:	RECEIVED BY:	DATE/TIME:
C. KAPUTA	1/9/25 1530	Received	
RELINQUISHED BY	DATE/TIME:	RECEIVED IN LAB BY:	DATE/TIME:
C. KAPUTA	1/14/25 1630	JAN 16 2025	

1 of 2

AMERISCI
America's Laboratory

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	TEM/LEVEL II								PC	
JOB NO.: 24058 ADKOPS# ~~24048~~	TEM/7402								25 mm	
	TEM/BULK						X		37 mm	
JOB MANAGER: Craig Kaputa	TEM/DUST								0.45 um	
	TEM/WATER								0.80 um	
JOB DESCRIPTION: 7551 South State St., Lowville	PLM						X		OTHER:	
	PCM									
	OTHER:									

RESULTS TO: Adirondack Operations INVOICE TO: Adirondack Operations
RETURN SAMPLES: YES ____ NO X
EMAIL RESULTS: (Y) / N EMAIL ADDRESS: adirondackoperations@gmail.com
PHONE: 315 834-2356
WRITTEN REPORT TO: Adirondack Operations Croghan, NY 13327
FAX:
COMMENTS: NA/PS by layer or sample
SITE FAX:
PAGER/CELL:

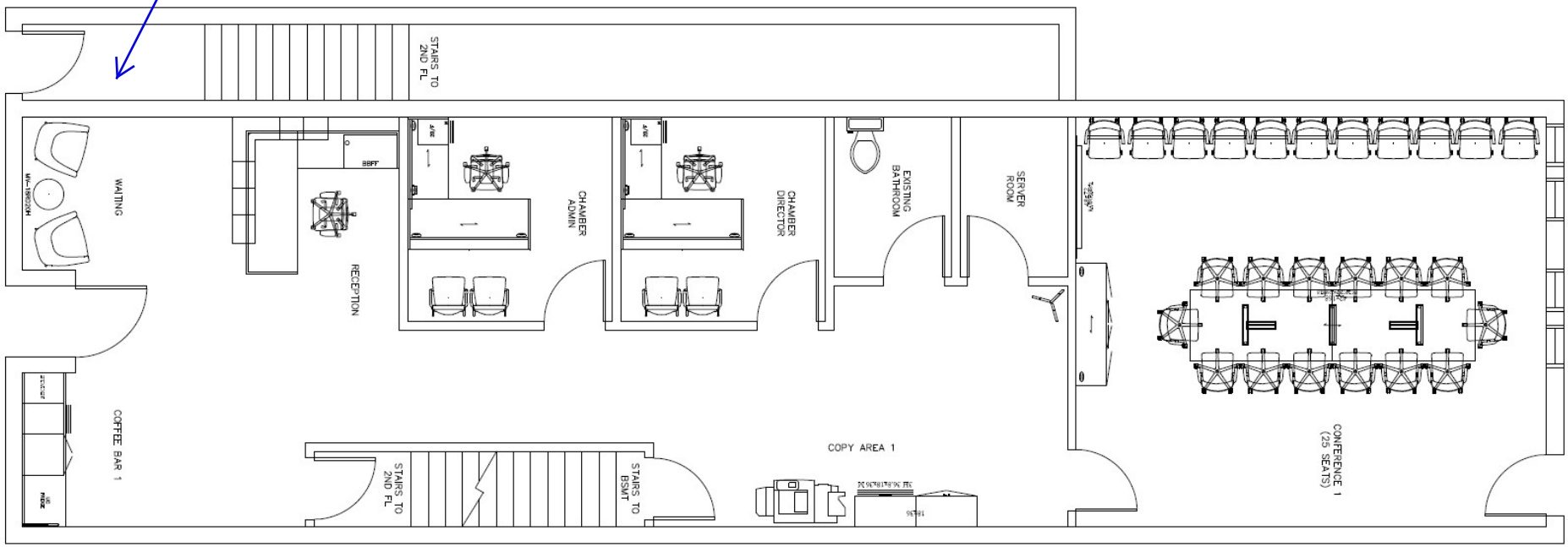
LAB ID	SAMPLE ID	SAMPLE LOCATION	START TIME	STOP TIME	TOTAL TIME	X LITERS /MIN.	= TOTAL VOLUME	DATE COLLECTED
	24058-008-A	ABANDONED WIRING - HOUSE						
	24058-008-B							
	24058-009-A	ABANDONED WIRING - KNOB + TUBE						
	24058-009-B							
	24058-010-A	BRICK MORTAR - GRAY						
	24058-010-B							
	24058-011-A	EXTERIOR FELT BEHIND VINYL SIDING						
	24058-011-B							
	24058-012-A	RESIDUE TAR ON EXT. WALL						
	24058-012-B							
	24058-013-A	HEAT FLASHED ROOF SEGMENT GRAY-SILVER						
	24058-013-B							
	24058-014-A	ROOFING - ASPHALT FELT, + ICE + WATER SHIELD						
	24058-014-B							
						Received		

SAMPLED BY:	DATE/TIME:	RECEIVED BY:	DATE/TIME:
C. KAPUTA	1/9/25 15:30	JAN 16 2025	
RELINQUISHED BY	DATE/TIME:	RECEIVED IN LAB BY:	DATE/TIME:
C. KAPUTA	1/14/25 16:30		

APPENDIX C: LOCATION PLAN SKETCHES

FIRST FLOOR SAMPLE LOCATION SKETCH

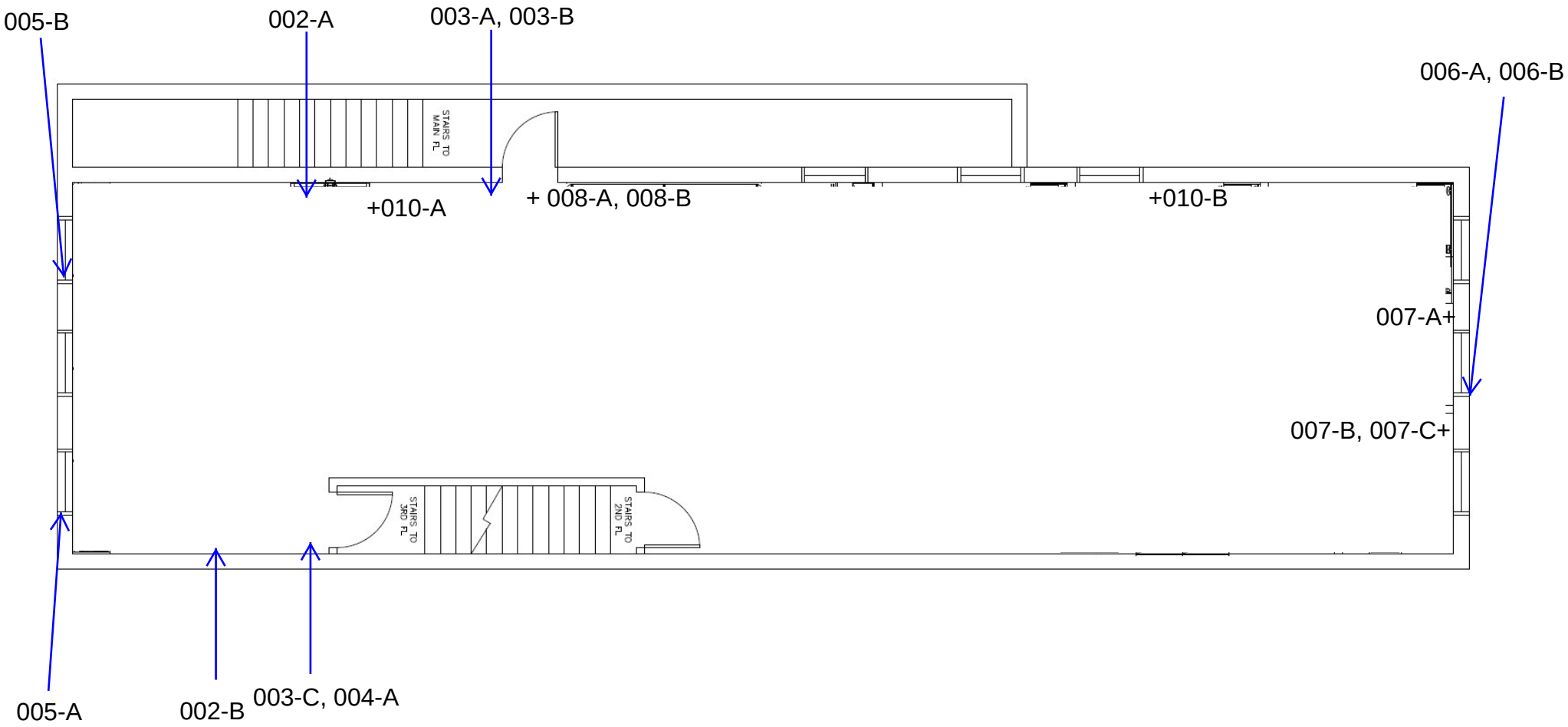
001-A, 001-B



ALL SAMPLES PREFIXED WITH "24058"

ALL SAMPLE LOCATIONS ARE APPROXIMATE

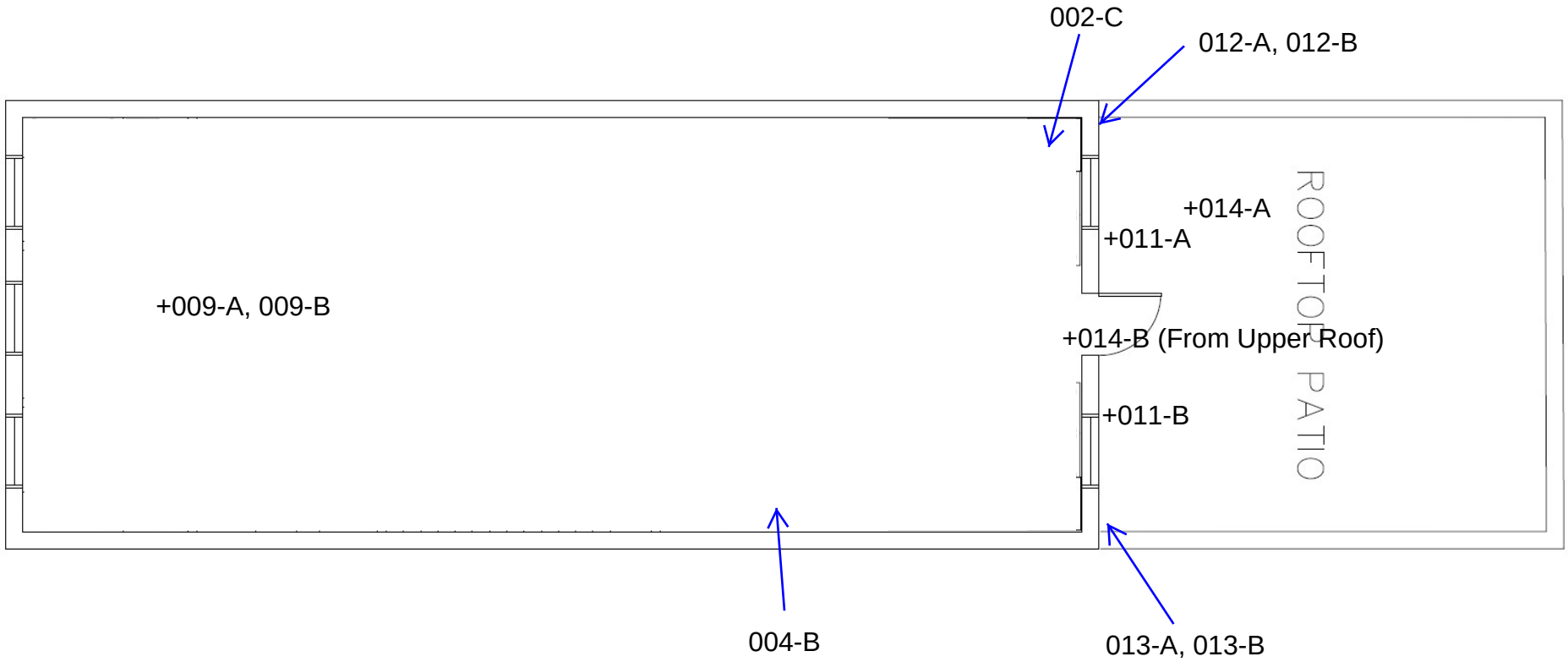
2ND FLOOR SAMPLE LOCATION SKETCH



ALL SAMPLES PREFIXED WITH "24058"

ALL SAMPLE LOCATIONS ARE APPROXIMATE

3RD FLOOR SAMPLE LOCATION SKETCH



APPENDIX D: CERTIFICATIONS

WE ARE YOUR DOL

NEW YORK STATE | Department of Labor

DIVISION OF SAFETY & HEALTH LICENSE AND CERTIFICATE UNIT, STATE OFFICE CAMPUS, BLDG. 12, ALBANY, NY 12226

ASBESTOS HANDLING LICENSE

Adirondack Operations, LLC
106 Hilltop Road, Syracuse, NY, 13215

License Number: 54945
License Class: RESTRICTED
Date of Issue: 09/16/2024
Expiration Date: 09/30/2025
Duly Authorized Representative: Mary Anne Kaputa

This license has been issued in accordance with applicable provisions of Article 30 of the Labor Law of New York State and of the New York State Codes, Rules and Regulations (12 NYCRR Part 56). It is subject to suspension or revocation for a (1) serious violation of state, federal or local laws with regard to the conduct of an asbestos project, or (2) demonstrated lack of responsibility in the conduct of any job involving asbestos or asbestos material.

This license is valid only for the contractor named above and this license or a photocopy must be prominently displayed at the asbestos project worksite. This license verifies that all persons employed by the licensee on an asbestos project in New York State have been issued an Asbestos Certificate, appropriate for the type of work they perform, by the New York State Department of Labor.

Amy Phillips, Director
For the Commissioner of Labor

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER

Expires 12:01 AM April 01, 2025
Issued April 01, 2024

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MR. CORY M. PARNELL
AMERISCI RICHMOND
13635 GENITO RD
MIDLOTHIAN, VA 23112

NY Lab Id No: 10984

is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:

Miscellaneous

Asbestos in Friable Material	Item 198.1 of Manual
	EPA 600/M4/82/020
Asbestos in Non-Friable Material-PLM	Item 198.6 of Manual (NOB by PLM)
Asbestos in Non-Friable Material-TEM	Item 198.4 of Manual
Asbestos-Vermiculite-Containing Mate	Item 198.8 of Manual

Serial No.: 68665

STATE OF NEW YORK - DEPARTMENT OF LABOR

ASBESTOS CERTIFICATE

N.Y.S

CRAIG KAPUTA

CLASS(EXPIRES)

D INSP (08/25) H PM (08/25)

C ATEC (08/25)

CERT# 24-6T671-SHAB

DMV# 484545058

MUST BE CARRIED ON ASBESTOS PROJECTS