

Industrial Hygiene, Safety & Environmental Services

LIMITED ASBESTOS BUILDING INSPECTION and LEAD PAINT INSPECTION

CDOT Region 3 Maintenance Shop Building 2829 East Shale Drive Rangely, Colorado 81648



Prepared for:

Phillip T. Kangas Colorado Department of Transportation 2828 West Howard Place, 4th Floor Denver, Colorado 80204

> Prepared by: Foothills Environmental, Inc. 11099 West 8th Avenue Lakewood, CO 80215

> > April 7, 2020 FEI Project No. AS2003-2 CDOT PO# 411023624

ACRONYMS

ACM Asbestos Containing Material

ACBM Asbestos Containing Building Material

AIHA American Industrial Hygiene Association

CDPHE Colorado Department of Public Health and Environment

EPA United States Environmental Protection Agency

OSHA Occupational Safety and Health Administration

NVLP National Voluntary Laboratory Accreditation Program

PLM Polarized Light Microscopy

PACM Presumed Asbestos Containing Material

RACM Regulated Asbestos Containing Material

SVF Sheet Vinyl Flooring

TEM Transmission Electron Microscopy

TSI Thermal System Insulation

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	1
1.1 Dev	ASBESTOS CONTAINING BUILDING MATERIALS REQUIRING REMOVAL PRIOR TO	1
1.2	LEAD-CONTAINING PAINT	
2.0	ASBESTOS INSPECTION	2
2.1 2.2 2.3 2.4	Scope of Work Standard Bulk Sampling and Analytical Procedures Scope of Work Building Description Statement of Inaccessibility	2 4
3.0	ASBESTOS-CONTAINING MATERIAL (ACM) LOCATION SUMMARY	5
3.	BULK SAMPLE INSPECTION SUMMARY 1.1 Suspect Surfacing Materials 1.2 Suspect Thermal System Insulation Materials 1.3 Suspect Miscellaneous Materials SAMPLE RESULTS TABLE	5 5
4.0	ASBESTOS RECOMMENDED ACTIONS	9
4.1 4.2 4.3 4.4 4.5	FRIABLE ACM NON-FRIABLE ACM MATERIALS CONTAINING 1% OR LESS ASBESTOS (TRACE) RACM VS NON-RACM ASBESTOS INSPECTION LIMITATIONS	9 9 9
5.0	LEAD PAINT INSPECTION	10
5.1 5.2 5.3 5.4 5.5 5.6 5.7	QUALIFICATIONS VISUAL INSPECTION TEST PROTOCOL LEAD ANALYTICAL RESULTS TCLP COMPOSITE SAMPLE COLLECTION PROTOCOL TCLP COMPOSITE SAMPLE RESULTS LEAD INSPECTION LIMITATIONS	11 12 14 14
Appe	ndix A – Sample and Material Location Drawings	
• •	ndix B – Laboratory Results	
Appe	ndix C – Photographs	
Appe	ndix D – Certifications	

1.0 EXECUTIVE SUMMARY

Limited bulk sampling of suspect building materials was conducted to identify Asbestos-Containing Materials (ACM) on the interior and exterior of the CDOT Region 3 Maintenance Shop building (Bldg. #1000/3/183) located at 2829 East Shale Drive in Rangely, Colorado.

Random bulk samples were collected of suspect building materials throughout the interior and exterior of the building. This asbestos inspection was conducted in general accordance to the guidelines published as the Environmental Protection Agency's Final Rule: Title II of the Toxic Substances Control Act (TSCA), 15 USC, Sections 2641 through 2654 or in compliance with 40 CFR, Part 763 and the Colorado Department of Public Health and Environment (CDPHE) Regulation #8.

Mr. Jason Martin, an EPA and Colorado Department of Public Health and Environment (CDPHE) certified asbestos inspector, conducted the inspection on March 25th, 2020. A total of thirty-nine (39) samples were collected for this investigation. Certifications are provided in Appendix D.

None of the building materials tested as part of this limited inspection contained asbestos.

1.1 Asbestos Containing Building Materials Requiring Removal Prior to Demolition

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

Non-RACMs are those non-friable materials not likely to be rendered friable during the normal demolition process, therefore are less likely to release airborne asbestos. Under normal demolition activities, non-RACMs that are non-friable Category I materials (gaskets, resilient flooring, adhesives, and asphalt roofing) and similar non-friable Category II are allowed by EPA and CDPHE regulations to remain during normal building demolition, and can be disposed of as normal demolition debris, provided these materials remain non-friable during demolition activities and the landfill will accept the waste as solid waste.

Table 1 - RACM

ACM Description/Homogeneous Area(s)	Condition	Type / Friable or Non-Friable	Analytical Result	Approx. Quantity	Material Locations
None	-	-	-	-	

Table 2 - Non-RACM >1%

ACM Description/Homogeneous Area(s)	Condition	Type / Friable or Non-Friable	Analytical Result	Approx. Quantity	Material Locations
None	-	-	-	-	-

Table 3 – Materials Containing 1% of Less Asbestos (Trace)

ACM Description/Homogeneous Area(s)	Condition	Type / Friable or Non-Friable	Analytical Result	Approx. Quantity	Material Locations
None	-	-	-	-	-

1.2 Lead-Containing Paint

Paint chip samples were collected from five (5) paints for lead-based paint (LBP) analysis during this inspection. Paint chip sample collection was limited to those non-metal building materials that may be removed and disposed of as part of the planned office/restroom renovation.

OSHA regulations apply to tasks that disturb lead based and lead containing paint.

Sample Number, Sample Color, and Substrate	Sample Location	Condition	Lead Concentration (%)
PB1-1 – Gray epoxy paint, concrete floor	Garage, northwest concrete floor	Good	BRL
PB2-1 – White on brown paint, vinyl cove base	Office, south wall cove base	Good	BRL
PB3-1 – Gray paint, plywood floor/deck	Loft, plywood floor/deck	Good	0.011
PB4-1 – White paint, drywall walls and ceiling	Office, south wall drywall	Good	BRL
PB5-1 – Blue paint, wood access panel	Garage west wall (Office), wood access panel	Good	BRL

BRL: Below Reporting Limit

2.0 ASBESTOS INSPECTION

The following sections summarize the survey findings and analytical results for suspect ACM sampled at the subject site. ACM summary tables shown have been prepared for each general sample location: floors, walls, ceilings, etc. These tables are organized to show each material analyzed, its asbestos content, and sample location. Representative samples of suspect materials were sent to an accredited laboratory for analysis.

2.1 Scope of Work

The combined goals of sampling and visual assessments were to:

- 1. Identify asbestos-containing material (ACM) at the building and document the location, condition, friability and quantity of each identified material.
- 2. Make appropriate recommendations on how to approach each material identified as an ACM prior to demolition or renovation.
- 3. Compile sample data information, observations obtained from site visits, conclusions and recommendations into a report.

2.2 Standard Bulk Sampling and Analytical Procedures Scope of Work

This asbestos inspection was completed in general accordance with the Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation using bulk sampling techniques referenced in OSHA 29 CFR 1910.1001, which in turn, references U.S. EPA Asbestos

Hazard Emergency Response Act (AHERA) protocol, which is incorporated by reference in Colorado, Regulation No. 8.

The inspection was completed by separating materials into Homogeneous Areas. A homogeneous area (material) is defined as an area containing a material that appears similar throughout with regard to color, texture, and date of application. Individual systems that were inspected, but not suspected to contain asbestos, are not included in this report. Such systems include concrete, carpet, fiberglass, plastic, and wood products. From the list of suspect homogeneous areas, a physical assessment was performed for each material on the list. A physical assessment includes evaluating the condition, friability, and amount of damage of each material. By definition, "friable" materials are those that can be crumbled or reduced to powder by hand pressure when dry. Each material on the list was further classified into one of three categories, which have specific sampling requirements for each category.

Surfacing Materials: Refers to spray or troweled applied surfaces such as plaster ceilings and

walls, fireproofing, textured paints, textured plasters, and spray-applied

acoustical surfaces.

Thermal System Insulation: Refers to insulation used to inhibit heat gain or loss on pipes, boilers,

tanks, ducts, and various other building components.

Miscellaneous Materials: Refers to friable and non-friable products and materials that do not fit in

any of the above two (2) categories such as resilient floor covering, baseboards, mastics, adhesives, roofing material, caulking, glazing, and siding. This category also contains wallboard, joint compound, and ceiling

tiles.

The condition of suspect materials was evaluated as "good", "damaged", or "significantly damaged" using the following parameters:

Good- material with no visible damage or deterioration or showing only very limited damage or deterioration.

Damaged- material which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that the bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Damaged material are those that are <10% scattered or <25% localized.

Significantly Damaged- material which has extensive and severe damage. Significantly damaged materials are those that are >10% scattered or > 25% localized.

Each suspect material was also classified as friable (F), Category I non-friable (Cat. I), or Category II non-friable (Cat. II), according to the U.S. EPA National Emissions Standard for Hazardous Air Pollutants (NESHAP) definitions.

The sampled materials were wetted with an amended water solution to minimize the release of airborne fibers during sample collection. A sample collection hand tool, cleaned after the collection of each sample,

was used to remove a small sample of suspect material. Each suspect material was placed into a small plastic bag, labeled, and sealed. Upon completion of sampling activities, samples were placed into a sealed container along with chain of custody forms and delivered for analysis to Reservoirs Environmental Inc. (REI) in Denver, Colorado. REI is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for conducting bulk and air sample analyses for asbestos.

As specified in 40 CFR Part 763, Subpart F, Appendix A, each sample was analyzed using Polarized Light Microscopy (PLM) in accordance with U.S. EPA Method 600/R-93/116, June, 1993. Some samples will contain numerous "layers". The laboratory will classify and report each layer found with a corresponding asbestos content. In some instances, bulk samples of similar materials (HAs) are reported as having a different number of layers. Percent asbestos for separate layers and total for the sample are delineated in the laboratory report. Unused portions of samples are archived for six months unless the client requests special handling.

The Environmental Protection Agency (EPA) defines ACM as a material containing greater than 1.0 percent (%) asbestos. Both friable and non-friable materials were sampled. A friable material is a material that when dry may be crumbled, pulverized, or reduced to powder by hand pressure. Because friable materials are more easily damaged and more likely to release fibers into the air, they are of greater concern than non-friable ACM.

Materials containing 1% or less asbestos are considered Trace by EPA and CDPHE. The Occupational Safety and Health Administration (OSHA) Construction Asbestos Standard 29 CFR 1926.1101 contains work practice and engineering control requirements and prohibitions that must be observed regardless of the percentage of asbestos in installed construction materials. Even though these materials are not regulated under the NESHAP for demolition, consideration must be given for worker exposure during any activities that may disturb them.

2.3 **Building Description**

The building is an approximately 3,040 square foot one-story metal frame structure originally constructed in 1987. In 2005-2006, the Garage portion was extended approximately twelve (12) feet to the south and a storage room was added on the west end of the Garage approximately ten (1) years ago. The exterior siding, roof and interior Garage walls are finished with steel panels. The floor throughout the building in concrete and a gray epoxy coating is applied to the Office, Restroom and northwest Garage floor. The Garage Storage Room walls were finished with painted plywood and the exterior siding and roof are finished with steel panels. The Office and Restroom were constructed with wood framing and the walls and ceiling are finished with textured drywall. Windows are aluminum frame double pane sliders.

2.4 Statement of Inaccessibility

Accessible areas of the structures were inspected for ACM. Underground conduit, electrical panels, instruments or other appurtenances were not inspected. Attempts were made to identify and access suspect materials; however, the potential for additional unidentified materials may exist within inaccessible areas, such as in machinery, in equipment, underground, etc. Any suspect materials located in these areas should be assumed asbestos-containing until sample collection can be performed and subsequent analyses prove otherwise.

Conclusions of the report are professional opinions based solely upon site observations and interpretations of analyses as described in our report. The opinions presented herein apply to site conditions at the time of our investigation, and interpretation of current regulations pertaining to regulated materials. Therefore, our

involving regulated materials.

opinions and recommendations may not apply to future conditions that may exist at the building, which we have not had the opportunity to evaluate. The regulations should always be verified prior to any work

Within the limitations of scope, schedule, and budget, our services have been executed in accordance with generally accepted practices in this area at the time this report was prepared. No other hazardous materials/wastes were investigated. No other conditions, expressed or implied, should be assumed.

3.0 ASBESTOS-CONTAINING MATERIAL (ACM) LOCATION SUMMARY

The following sections summarize the survey findings and analytical results for suspect ACM sampled at the subject site. ACM summary tables shown have been prepared for each general sample location: floors, walls, ceilings, etc. These tables are organized to show each material analyzed, its asbestos content, and sample location. Representative samples of suspect materials were sent to an accredited laboratory for analysis.

3.1 Bulk Sample Inspection Summary

The following suspect materials were identified and sampled on the exterior of the former commercial building. The material identification is listed by Homogeneous Area designation and description following:

3.1.1 Suspect Surfacing Materials

• TEX1-1 – Drywall surface texture (orange peel)

3.1.2 Suspect Thermal System Insulation Materials

None

3.1.3 Suspect Miscellaneous Materials

- CDW1 Composite drywall, joint compound and surface texture (orange peel)
- DM1 Duct mastic, gray
- INS1 Insulation, fiberglass
- CBG1 Vinyl cove base, 4" gray with tan mastic
- CK1 Caulk, red
- CK2 Caulk, white
- ECK1 Exterior caulk, silver
- ECK2 Exterior caulk, white
- EJ1 Expansion joint material
- SF1 Screw flashing (Garage addition siding)
- SF2 Screw flashing (original Garage siding)
- SF3 Screw flashing (Garage Storage Addition siding)
- ECK3 Exterior caulk, butyl gray (Garage addition roof)
- ECK4 Exterior caulk, butyl gray (original Garage addition roof)
- BM1 Black roofing mastic
- FS1 Foundation sealant, black

EJC1 – Expansion joint caulk, light gray

3.2 SAMPLE RESULTS TABLE

The following table summarizes sample results collected for this project. A copy of analytical results is attached in Appendix B to this report for your reference. Room numbers (where indicated) are as described on Drawings in Appendix A.

The following table summarizes the sample results collected from the interior and exterior of the CDOT Region 3 Maintenance Shop building:

Data #	Sample Number	Material Description	Sample Location		Approx. Quantit y	Analytical Result
1	CDW1-1	Composite drywall, joint compound and	Office, east wall, southeast corner	G / NF	750 SF	ND*
2	CDW1-2	surface texture (orange peel)	Restroom, east wall, southeast corner	G/Nr	/30 SF	ND*
3	TEX1-1		Office, west wall			ND*
4	TEX1-2	Drywall surface texture (orange peel)	Restroom, east wall	G/NF	750 SF	ND*
5	TEX1-3		Restroom, west wall			ND*
6	DM1-1	D ()	Garage, heater intake duct, 2 nd from east	C /NE	20 GE	ND
7	DM1-2	Duct mastic, gray	Garage, heater intake duct, 3 rd from east	G/NF	20 SF	ND
8	INS1-1	T 17. C1 1	Loft, ceiling cavity, at sewer vent	C / F	11 000 CE	ND
9	INS1-2	Insulation, fiberglass	Garage, west wall	G/F	11,000 SF	ND
10	CBG1-1	X7: 1 1 422	Restroom, south wall, west of door	G (NE	24.00	ND
11	CBG1-2	Vinyl cove base, 4" gray with tan mastic	Office, south wall, west of door	G/NF	24 SF	ND
12	CK1-1	C 11 1	Garage, heater exhaust duct, 3 rd from east	C /NE	10 SF	ND
13	CK1-2	Caulk, red	Garage, heater exhaust duct, 2 nd from east	G/NF	10 51	ND
14	CK2-1	Carolla archite	Restroom, window, right lower	G / NF	2 SF	ND
15	CK2-2	Caulk, white	Restroom, window, left lower	G/NF		ND
16	ECK1-1	Exterior caulk, silver	East exterior, at vent	G / NF	4 SF	ND
17	ECK1-2	Exterior caulk, silver	North exterior, at 4 th vent from east	G/Nr	4 SF	ND
18	ECK2-1		Southwest man door roof, south at roof			ND
19	ECK2-2	Exterior caulk, white	East roof gutter, at seam	G/NF	10 SF	ND
20	ECK2-3		East roof gutter, at seam			ND
21	EJ1-1	Ermanaian isint matarial	Garage, floor at north man door	G/F	9 SF	ND
22	EJ1-2	Expansion joint material	Garage, floor at west wall	G/F	9 SF	ND
23	SF1-1	Sarayy flooking (Camaga addition = idin =)	Garage addition, east exterior	G/NF	2 SF	ND
24	SF1-2	Screw flashing (Garage addition siding)	Garage addition, south exterior, southwest corner	G/NF	2 51	ND
25	SF2-1	Concreted for the control of the con	Original Garage, east exterior	G/NF	4 SF	ND
26	SF2-2	Screw flashing (original Garage siding)	Original Garage, north exterior	U/NF	4 SF	ND

F= friable NF=non-friable

†= approximate total square feet of drywall

G=good D=damaged SD=severely damaged SF=square feet LF=lineal feet

ND=none detected *= multiple layers

The following table summarizes the sample results collected from the interior and exterior of the CDOT Region 3 Maintenance Shop building:

Data #	Sample Number	Material Description	Sample Location	Condition	Approx. Quantity	Analytical Result
27	SF3-1	Screw flashing (Garage Storage Addition	Garage Storage Addition, north exterior	G / NF	1 SF	ND
28	SF3-2	siding)	Garage Storage Addition, west exterior	G/Nr	1 51	ND
29	ECK3-1	Exterior caulk, butyl gray (Garage addition	Southwest man door roof, south and peak	C /NE	10 SE	ND
30	ECK3-2	roof)	Garage addition roof, peak	G / NF	10 SF	ND
31	ECK4-1	Exterior caulk, butyl gray (original Garage	Original Garage roof, west edge	G/NF	30 SF	ND
32	ECK4-2	roof)	Original Garage roof, peak	G/NF		ND
33	BM1-1	Dil f	Roof, north center vent	C /NE	4 SF	ND*
34	BM1-2	Black roofing mastic	Roof, northwest sewer vent	G / NF		ND
35	FS1-1	Frondetion scalant block	Garage addition, east foundation, south end	C /NE	10 CF	ND
36	FS1-2	Foundation sealant, black	Garage addition, east foundation, north end	G / NF	10 SF	ND*
37	EJC1-1		Garage addition, east interior floor			ND*
38	EJC1-2	Expansion joint caulk, light gray	Garage addition, west interior floor	G/NF	5 SF	ND*
39	EJC1-3]	Garage addition, west interior floor			ND*

F= friable NF=non-friable

†= approximate total square feet of drywall

G=good D=damaged

SD=significantly damaged SF=square feet LF=lineal feet

ND=none detected *= multiple layers

4.0 ASBESTOS RECOMMENDED ACTIONS

Asbestos-Containing Materials – General

Removal, in accordance with the Colorado Department of Public Health and Environment's (CDPHE) Regulation No. 8, is required of materials with an asbestos content greater than one percent (1%) that are friable or will be made friable during renovation or demolition activities. Friable means that the material, when dry may be crumbled, pulverized, or reduced to powder by hand pressure.

The National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations set forth by the U.S. Environmental Protection Agency control asbestos emissions from renovation and demolition activities.

The following sections describe materials that were identified during this inspection and recommended actions prior to renovation or demolition.

4.1 Friable ACM

Friable ACM must be removed prior to demolition.

The following materials were identified as friable during the investigation:

None

4.2 Non-friable ACM

The following materials were identified as non-friable ACM during the inspection:

None

4.3 Materials Containing 1% or Less Asbestos (Trace)

The following materials were identified as trace materials during the inspection:

None

4.4 RACM vs NON-RACM

ACM identified that are non-friable usually remain non-friable in their current condition; however, they may become friable during renovation or demolition activities. These materials must be removed prior to activities that will render them friable including (drilling, sanding, grinding, or cutting). Removal is recommended before renovation or demolition unless minimal or no breakage is reasonably achievable.

Removal of non-friable ACM must be performed by trained personnel according to procedures outlined in current regulations. Removal activities must be completed in compliance with the OSHA Asbestos in Construction standard 29 CFR 1926.1101 as a Class II work operation, which includes engineering controls and monitoring. Some landfills allow the materials to be disposed with construction debris; however, the waste hauler and landfill must be notified that they are receiving a Category II non-friable asbestos material.

If the material is removed as an asbestos removal project it should be disposed of as non-friable asbestos waste.

4.5 Asbestos Inspection Limitations

This report describes the installed locations and conditions of ACM identified in the facility during the inspection. FEI represents that our services are performed within the limits prescribed by applicable regulations and in a manner consistent with the level of care and skill ordinarily exercised by other professional consultants under similar circumstances. No other representation is made to the client, expressed or implied, and no warranty or guarantee is included or intended.

Accessible areas of the structures were inspected for ACM. Underground conduit, electrical panels, fire rated doors, instruments or other appurtenances were not inspected. Attempts were made to identify and access suspect materials; however, the potential for additional unidentified materials may exist within inaccessible areas, such as behind walls, in chases, beneath carpeted areas, in machinery, in equipment, underground etc. Any suspect materials located in these areas should be assumed asbestos-containing until sample collection can be performed during destructive testing and subsequent analyses prove otherwise.

Conclusions of the report are professional opinions based solely upon site observations and interpretations of analyses as described in our report. The opinions presented herein apply to site conditions at the time of our investigation, and interpretation of current regulations pertaining to regulated materials. Therefore, our opinions and recommendations may not apply to future conditions that may exist at the building, which we have not had the opportunity to evaluate. The regulations should always be verified prior to any work involving regulated materials.

This document describes the locations and conditions of ACM identified in the facility during the time of inspection. This report is limited to the scope of work identified in this report and should not be construed to represent anything outside the scope of work.

5.0 LEAD PAINT INSPECTION

The purpose of this inspection is to identify and assess painted components at the subject property which could be subject to individual component demolition/renovation activities and to determine the level of lead hazard control needed at the property. The intent of this study was to identify the presence of lead-based paint above specified regulatory action levels. If lead-based paint was found, the inspection would identify the architectural components and their respective lead concentrations in such a manner that this report could be used as a basis for subsequent abatement activity. This report presents the results of Foothills Environmental, Inc.'s lead-based paint inspection of the CDOT Region 3 Maintenance Shop building in Rengely, Colorado. The inspection was performed on March 25th, 2020.

The sampling strategy was based on procedures outlined by the U.S. Department of Housing and Urban Development (HUD) "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. USEPA regulation 40 CFR Part 745, defines LBP as paint containing equal to or greater than 0.5% lead by weight (>0.5%). The USEPA and HUD regulations are applicable to residential properties and child-occupied facilities and the lead-based paint definition is referenced herein as a benchmark. FEI understands that the subject property does not meet the definition of a child-occupied facility. This assessment is not a comprehensive survey and is not compliant with all of the EPA and HUD sampling requirements.

The Occupations Safety and Health Administration (OSHA) regulations apply to tasks that disturb lead based and lead containing paint. OSHA considers lead containing paint of any measurable concentration

as a potential hazard to health and requires an exposure assessment for any work activities that may disturb lead based or lead containing paint.

Additionally, lead-containing materials require a hazardous waste determination pursuant to 40 CFR 262.11, and 40 CFR 261.24. It is a standard industry approach that demolition waste characterization should be performed on structures containing lead-based paint. This procedure is the Toxicity Characteristic Leaching Procedure (TCLP), where a composite sample representative of all building components to be demolished (i.e. all lead-based paint coated and non-lead-based paint coated materials from the structure) is submitted to the laboratory for analysis. The Toxicity Characteristic (TC) limit for lead is 5 part per million (ppm) in the leachate. Materials that exceed this limit must be disposed of as hazardous waste. Materials that do not exceed this limit may be disposed of as solid waste.

5.1 Qualifications

Jason Martin, a Certified Industrial Hygienist (CIH), initially surveyed painted surfaces throughout the structure using a Heuresis Pb200i Lead Paint spectrum analyzer X-ray Fluorescence (XRF) direct reading instrument. Jason then performed a lead based paint inspection using paint chip sampling techniques for the portions of the Office and Restroom that will be removed and disposed of during the planned renovation project. Foothills Environmental, Inc. is a state of Colorado Lead Evaluation Firm #14927.

5.2 Visual Inspection

A visual inspection by FEI revealed that there were five (5) distinct types of paint used on non-metal building component surfaces that will be removed as part of the planned renovation project. Five (5) samples in total were collected of those painted surface.

5.3 Test Protocol

The XRF utilized for this project was a Heuresis Pb200i Lead Paint spectrum analyzer instrument. The instrument was calibrated to the manufacturer's specifications and was also periodically verified against the National Institute of Standards and Testing (NIST) Standard Reference Materials (SRM) 2570 lead film (0.0 mg/cm²), (SRM) 2571 lead film (3.58 mg/cm²), (SRM) 2572 lead film (1.53 mg/cm²), (SRM) 2573 lead film (1.04 mg/cm²).

Paint chip samples were collected in accordance with U.S. EPA (Guidance on Identification of Lead-Based Paint Hazards) and HUD guidelines. Paint chip sampling involved collection of representative samples of painted material. Paint chip samples were selected based on color and homogeneity of the paint. A razor scraper, cleaned after the collection of each sample, was used to remove a small area of paint.

The inspector removed paint down to the substrate (i.e. concrete, wood, steel, etc.), making sure all layers of paint were intact, and placed it into a pre-labeled plastic bag. Additional paints may exist under the surface coat in different areas other than those tested. Subsequently, a wet cloth was used to clean the area and residual material was placed into a plastic bag and removed by FEI.

Paint chip samples were analyzed by Reservoirs Environmental, Inc. (REI) in Denver, Colorado, which is an American Industrial Hygiene Association (AIHA) accredited and Environmental Lead Laboratory Accreditation Program (ELLAP) accredited laboratory, using Inductively Coupled Plasma Spectrometry according to U.S. EPA Method 3050B/6010C. Laboratory qualifications are in Appendix D.

5.4 Lead Analytical Results

No lead-based paints were identified during the inspection: One (1) lead-containing paints were identified during inspection. The paint chip sample collected from the gray paint on the Loft plywood floor/deck was determined to be lead-containing at 0.011% by weight. All other samples were below the reporting limit for the analysis method used by the laboratory. Analytical results and chain of custody forms are located in Appendix B.

The following table summarizes the paint chip sample analysis results:

Sample Number, Sample Color, and Substrate	Sample Location	Condition	Lead Concentration (%)
PB1-1 – Gray epoxy paint, concrete floor	Garage, northwest concrete floor	Good	BRL
PB2-1 – White on brown paint, vinyl cove base	Office, south wall cove base	Good	BRL
PB3-1 – Gray paint, plywood floor/deck	Loft, plywood floor/deck	Good	0.011
PB4-1 – White paint, drywall walls and ceiling	Office, south wall drywall	Good	BRL
PB5-1 – Blue paint, wood access panel	Garage west wall (Office), wood access panel	Good	BRL

BRL = Below Reporting Limit

The following table summarizes the XRF survey results:

Shot	Room	Object	Substrate	Color	Location	Pb (mg/cm²)	LBP Result
1	N/A	Blank	N/A	N/A	N/A	0.0	Negative
2	N/A	Positive Baseline	N/A	N/A	N/A	1.0	Positive
3	N/A	Positive Baseline	N/A	N/A	N/A	1.0	Positive
4	N/A	Positive Baseline	N/A	N/A	N/A	1.0	Positive
5	Office	Wall	Drywall	White	North	0.1	Negative
6	Office	Ceiling	Drywall	White	Ceiling	0.0	Negative
7	Office	Baseboard	Vinyl	White/Brown	South	0.2	Negative
8	Office	Perimeter Siding	Metal	Off-White	North	-0.1	Negative
9	Restroom	Wall	Drywall	White	East	0.2	Negative
10	Restroom	Wall	Drywall	White	South	0.1	Negative
11	Restroom	Heat Register	Metal	Tan	West	0.1	Negative
12	Restroom	Water Heater	Metal	Tan	East	-0.2	Negative
13	Garage	Wall Siding	Metal	Off-White	West	-0.1	Negative
14	Garage	Office Wall Siding	Metal	Off-White	West	-0.1	Negative
15	Garage	Fuse Box	Metal	Brown	North	0.1	Negative
16	Garage	Wall Siding	Metal	Off-White	North	-0.1	Negative

Shot	Room	Object	Substrate	Color	Location	Pb (mg/cm²)	LBP Result
17	Garage	Wall Siding	Metal	Off-White	East	-0.1	Negative
18	Garage Addition	Wall Siding	Metal	White	East	0.1	Negative
19	Garage Addition	Wall Siding	Metal	White	South	-0.1	Negative
20	Garage Addition	Wall Siding	Metal	White	West	0.0	Negative
21	Garage	Door	Metal	White	West	-0.1	Negative
22	Exterior	Roof Gutter	Metal	White	West	0.1	Negative
23	Exterior	Garage Door Trim	Metal	White	South	-0.1	Negative
24	Exterior	Garage Door	Metal	White	South	0.0	Negative
25	Exterior	Crash Post	Metal/Concrete	Yellow	South	0.2	Negative
26	Exterior	Siding	Metal	Tan	South	0.1	Negative
27	Garage Addition Exterior	Siding	Metal	Tan	East	0.1	Negative
28	Exterior	Siding	Metal	Tan	East	-0.1	Negative
29	Exterior	Gas Meter	Metal	Gray	North	0.8	Negative
30	Exterior	Gas Meter Pipe	Metal	Gray	North	-0.1	Negative
31	Exterior	Door	Metal	Silver	North	0.0	Negative
32	Exterior	Door Frame	Metal	Silver	North	-0.1	Negative
33	Exterior	Door Frame	Metal	Reb	North	-0.1	Negative
34	Exterior	Siding	Metal	Tan	North	0.0	Negative
35	Exterior	Utility Box	Metal	Gray	North	0.0	Negative
36	Exterior	Siding Trim	Metal	Off-White	Northwest	-0.1	Negative
37	Exterior	Window Grate	Metal	Black	West	0.0	Negative
38	Storage Addition Exterior	Siding	Metal	Tan	West	0.1	Negative
39	Garage Addition Exterior	Roof	Metal	White	Roof	-0.1	Negative
40	Storage Addition	Wall	Wood	White	West	0.0	Negative
41	Storage Addition	Wall	Wood	White	North	0.0	Negative
42	Garage	Support Beam	Metal	Gray	West	0.0	Negative
43	Garage	Beam Footer	Concrete	Red	West	0.1	Negative
44	Garage	Support Beam	Metal	Red	West	0.0	Negative
45	Garage	Stair Rail	Metal	Black	North	0.1	Negative
46	Garage	Stairs	Metal	Yellow	North	0.0	Negative
47	Loft	Floor/Deck	Wood	Gray	Floor	0.0	Negative
48	Loft	Roof Beam	Wood	Red	North	0.0	Negative
49	Garage	Floor	Concrete	Yellow	North	0.2	Negative
50	Garage	Peg Board	Wood	White	North	0.0	Negative
51	Garage	Peg Board	Wood	Yellow	North	-0.4	Negative
52	Garage	Wall Siding	Metal	Red	North	-0.1	Negative
53	Garage	Door	Metal	Black	North	0.0	Negative
54	Garage	Access Panel	Wood	Blue	West	0.0	Negative
55	Garage	Floor Epoxy	Concrete	Gray	Floor	0.4	Negative
56	Garage	Wall Siding	Metal	Red	North	-0.1	Negative
57	Garage	Wall Board	Wood	Off-White	North	0.1	Negative
58	Office	Floor Epoxy	Concrete	Gray	Floor	0.4	Negative

Shot	Room	Object	Substrate	Color	Location	Pb (mg/cm²)	LBP Result
59	N/A	Positive Baseline	N/A	N/A	N/A	1.0	Positive
60	N/A	Positive Baseline	N/A	N/A	N/A	1.0	Positive
61	N/A	Positive Baseline	N/A	N/A	N/A	1.1	Positive
62	N/A	Blank	N/A	N/A	N/A	0.1	Negative

For the purposes of this report, LBP has been classified as being either in Good, Fair, or Poor condition. The following are the general definitions of each condition category:

Intact (Good) Condition	Paint is intact with no sign of peeling or damage over the component system
Fair Condition	Paint shows signs of wear (chalking, peeling, chipping, abrasion, or minimal delamination less than 10% of a component surface, due to age or other factors such as moisture or physical contact.
Poor condition	Paint is substantially delaminating or peeling greater than 10% of a component surface or 25% in a focused area of the component system.

5.5 TCLP Composite Sample Collection Protocol

FEI collected a composite sample to determine the lead content of the non-metal building materials that may be removed and disposed of a s part of the planned Office and Restroom renovation project. FEI identified the different components to be demolished and collected aliquots or sub-samples of each component by removing portions of the components. The sub-samples were selected carefully to ensure that the resulting composite sample would be representative of the components to be demolished. The sub-samples were combined together in proportion to their percent by weight representative of the total quantity of debris being removed. The resulting weight of the composite exceeded the 100-gram minimum sample weight specified for the TCLP test. The composite sample was hand delivered to Reservoirs Environmental for TCLP analysis and placed on hold until further notice from CDOT.

5.6 TCLP Composite Sample Results

The TCLP sample collected from the building materials that may be impacted by the planned Office and Restroom renovation was processed at the request of CDOT since one of the paint chip samples came back at >0.01% lead by weight. The TCLP analysis results received from Reservoirs Environmental, Inc. revealed results below the reporting limit or <0.25 milligrams per liter (mg/l) of lead. The debris is classified as hazardous waste if the TCLP sample result is greater than or equal to 5.0 milligrams per liter (mg/l) of lead. The debris is classified as solid waste if the TCLP sample result is less than 5.0 mg/l.

5.7 Lead Inspection Limitations

This inspection was planned, developed, and implemented based on experience in performing lead-based paint inspections by Foothills Environmental, Inc. Foothills Environmental Inc. utilized state-of-the-art practices and techniques in accordance with regulatory standards while performing this inspection. A copy of personnel certifications and equipment licenses has been provided for your review.

Prepared by:

Jason Martin, CIH, CSP Senior Industrial Hygienist

CDPHE Asbestos Inspector # 16218

Reviewed by:

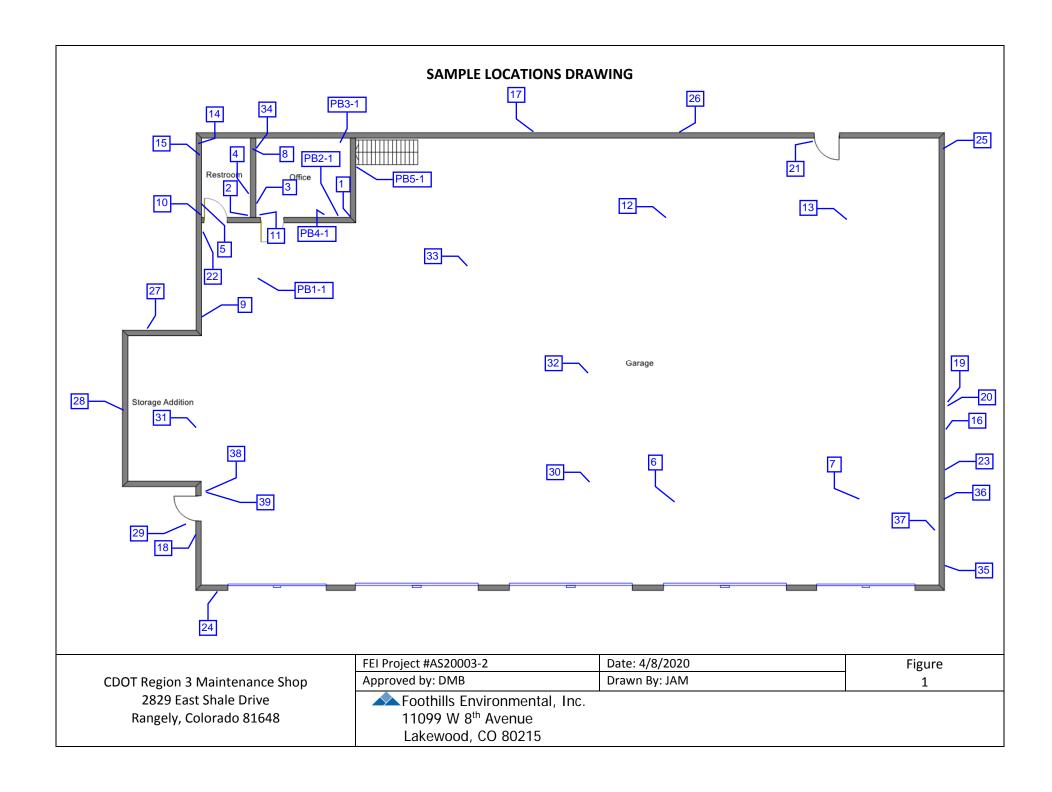
Andre Gonzalez, CIH

President

CDPHE Certification #3199

Appendix A

Sample Location Drawings



Appendix B

Laboratory Results



March 27, 2020

Subcontractor Number:

Laboratory Report: RES 459663-1
Project #/P.O. #: AS20003-2
Project Description: CDOT Rangely

Jason Martin Foothills Environmental, Inc. (Lakewood) 11099 W. 8th Avenue Lakewood CO 80215

Dear Jason,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the National Voluntary Laboratory Accreditation Program (NVLAP), Lab Code 101896-0 for Transmission Electron Microscopy (TEM) and Polarized Light Microscopy (PLM) analysis and the American Industrial Hygiene Association (AIHA), Lab ID 101533 - Accreditation Certificate #480 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Reservoirs Environmental, Inc. has analyzed the following samples for asbestos content as per your request. The analysis has been completed in general accordance with the appropriate methodology as stated in the attached analysis table. The results have been submitted to your office.

RES 459663-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely,

Jeanne Spencer

President

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 459663-1

Client: Foothills Environmental, Inc. (Lakewood)

Client Project Number / P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: Standard

Date Samples Analyzed: March 26, 2020 - March 27, 2020

ND=None Detected
TR=Trace, <1% Visual Estimate
Trem/Act=Tremolite/Actinolite

Client	L	O. d.	Asbestos Content	Non	
Sample Number	Physical E Description R	Sub Part (%)	Mineral Visual Estimate (%)		Components
CDW1-1	A Off white tape	5	: (70) ND	90	10
	B White texture w/ off white/multi-colored paint	10	ND	0	100
	C White joint compound	10	ND	0	100
	D Off white/tan drywall	75	ND	17	83
CDW1-2	A Off white tape	5	ND	90	10
	B White joint compound	5	ND	0	100
	C White texture w/ off white/multi-colored paint	10	ND	0	100
	D Off white/tan drywall	80	ND	18	82
TEX1-1	A White texture w/ off white/multi-colored paint	40	ND	0	100
	B Tan/off white drywall	60	ND	65	35
TEX1-2	A White texture w/ off white/multi-colored paint	35	ND	0	100
	B Tan/off white drywall	65	ND	50	50
TEX1-3	A White texture w/ off white/multi-colored paint	25	ND	0	100
	B Off white/tan drywall	75	ND	40	60

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 459663-1

Client: Foothills Environmental, Inc. (Lakewood)

Client Project Number / P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: Standard

Date Samples Analyzed: March 26, 2020 - March 27, 2020

ND=None Detected
TR=Trace, <1% Visual Estimate
Trem/Act=Tremolite/Actinolite

Client Sample Number	L A Physical	Sub Part	Asbestos Content Mineral Visual	Non Asbestos Fibrous	Fibrous
	E Description R	(%)	Estimate (%)	Components (%)	
DM1-1	A Gray resinous material	100	ND	0	100
DM1-2	A Gray resinous material	100	ND	0	100
INS1-1	A Black insulation	100	ND	95	5
INS1-2	A Off white insulation	100	ND	95	5
CBG1-1	A Gray cove base w/ tan adhesive	100	ND	0	100
CBG1-2	A Gray cove base w/ tan adhesive	100	ND	0	100
CK1-1	A Red caulk	100	ND	0	100
CK1-2	A Red caulk	100	ND	0	100
CK2-1	A White caulk w/ off white/tan paint	100	ND	0	100
CK2-2	A White caulk w/ off white/tan paint	100	ND	0	100
ECK1-1	A Silver caulk	100	ND	0	100
ECK1-2	A Silver caulk	100	ND	0	100
ECK2-1	A White caulk	100	ND	0	100
ECK2-2	A White caulk	100	ND	0	100

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 459663-1

Client: Foothills Environmental, Inc. (Lakewood)

Client Project Number / P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: Standard

Date Samples Analyzed: March 26, 2020 - March 27, 2020

ND=None Detected TR=Trace, <1% Visual Estimate Trem/Act=Tremolite/Actinolite

Client	L	Cub	Asbestos Content	Non	
Sample Number	Y Physical E Description		Mineral Visual Estimate	Components	Components
	R	(%)	(%)	(%)	(%)
ECK2-3	A White caulk	100	ND	0	100
EJ1-1	A Black/multi-colored fibrous material	100	ND	80	20
EJ1-2	A Brown/multi-colored fibrous material	100	ND	85	15
SF1-1	A Black resinous material w/ a trace of off white/silver paint	100	ND	0	100
SF1-2	A Black resinous material w/ a trace of off white/silver paint	100	ND	0	100
SF2-1	A Black resinous material w/ a trace of off white/silver paint	100	ND	0	100
SF2-2	A Black resinous material w/ a trace of off white paint	100	ND	0	100
SF3-1	A Black resinous material w/ a trace of off white/silver paint	100	ND	0	100
SF3-2	A Black resinous material w/ off white/silver material	100	ND	0	100
ECK3-1	A Gray caulk	100	ND	0	100

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 459663-1

Client: Foothills Environmental, Inc. (Lakewood)

Client Project Number / P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: Standard

Date Samples Analyzed: March 26, 2020 - March 27, 2020

ND=None Detected
TR=Trace, <1% Visual Estimate
Trem/Act=Tremolite/Actinolite

Client	L	Out	Asbestos Content	Non	
Sample Number	A Y Physical	Sub Part	Mineral Visual	Asbestos Fibrous	
Number	E Description		Estimate	Components	
	R	(%)	(%)	(%)	(%)
ECK3-2	A Gray caulk	100	ND	0	100
ECK4-1	A Gray caulk	100	ND	0	100
ECK4-2	A Gray caulk	100	ND	0	100
BM1-1	A Brown/colorless caulk	25	ND	0	100
	B Black fibrous tar	75	ND	12	88
BM1-2	A Black fibrous tar	100	ND	12	88
FS1-1	A Black tar	100	ND	4	96
FS1-2	A Tan powder	10	ND	0	100
	B Black tar	90	ND	5	95
EJC1-1	A White resinous material	10	ND	0	100
	B Gray resinous material	90	ND	0	100
EJC1-2	A White resinous material	8	ND	0	100
	B Gray resinous material	92	ND	0	100

NVLAP Lab Code 101896-0

TABLE: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: RES 459663-1

Client: Foothills Environmental, Inc. (Lakewood)

Client Project Number / P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Method: EPA 600/R-93/116 - Short Report, Bulk

Turnaround: Standard

Date Samples Analyzed: March 26, 2020 - March 27, 2020

ND=None Detected

TR=Trace, <1% Visual Estimate Trem/Act=Tremolite/Actinolite

Client	L	Asbestos Content	Non	
Sample Number	A Standard Standard Standard Standard Pa	rt Mineral Visual	Asbestos Fibrous Components	Components
	R (%	(%)		(%)
EJC1-3	A White resinous material 1.	2 ND	0	100
	B Gray resinous material 8	ND ND	0	100

TEM Analysis recommended for organically bound material (i.e. floor tile) if PLM results are <1%.

Emily R. Giddens

Analyst

Analyst

Josh E. Baker

John C. Mcin

Analyst

yler Hutchinson

Analyst

Data QA



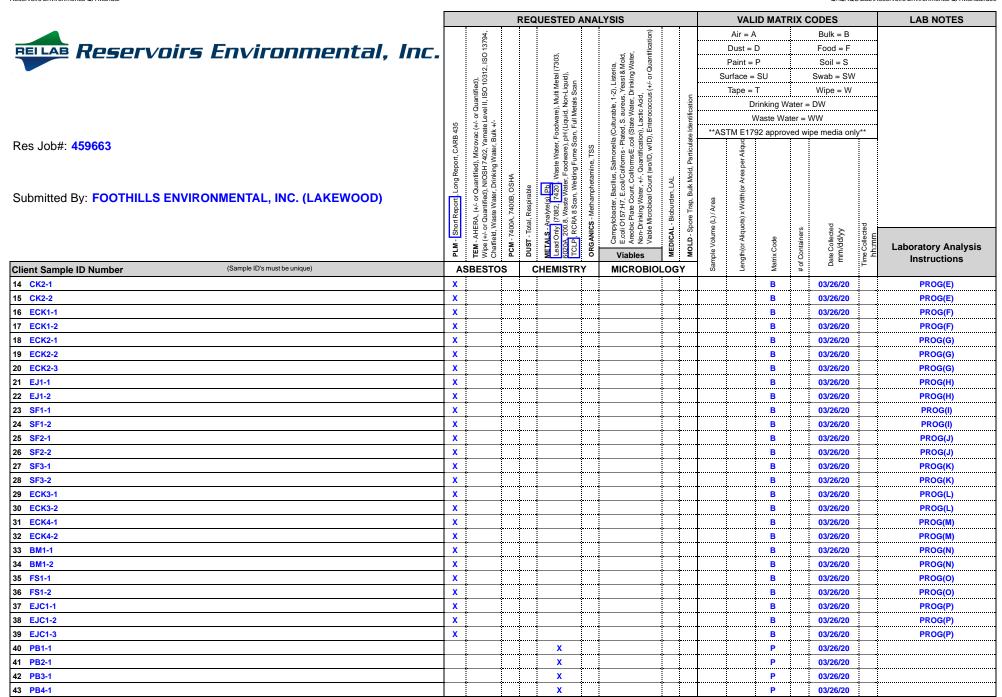
RES Job #: 4596	63

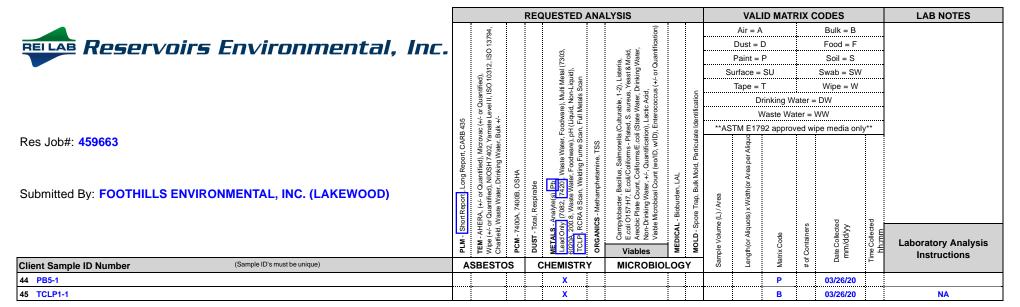
SUBMITTED BY			INVOICE 1	го	CONTACT	INFORMATION		SERIES
Company: FOOT	THILLS ENVIRONME	NTAL, INC. (LAKEWO	Company:	FOOTHILLS ENVIRONMENTAL, INC. (LAKEWO	Contact:	JASON MARTIN		-1 PLM STANDARD
Address: 1109	99 W. 8TH AVENUE		Address:	11099 W. 8TH AVENUE	Phone:	(720) 837-7312		-2 CHEM STANDARD -3 CHEM STANDARD
					Fax:			
LAKE	(EWOOD, CO 80215			LAKEWOOD, CO 80215	Cell:			
Project Number an	nd/or P.O. #:	AS20003-2			Final Data	Deliverable Email Address:		
Project Description/Location: CDOT RANGELY				JASON@FOOTHILLSUSA.COM (+ 1 ADDNL. CONTACTS)				

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm & Sat. 8am - 5pm	ı	REQUESTED ANALYSIS					VALID MATRIX CODES				
PLM / PCM / TEM DTL RUSH PRIORITY STANDARD				P	Air = A		Bulk = B				
	3794		ation	Di	ust = D	I	Food = F				
CHEMISTRY LABORATORY HOURS: Weekdays: 8am - 5pm	30 13	33,	ntifica	Pa	aint = P		Soil = S				
Dust RUSH PRIORITY STANDARD	12, 18	(3	2), Listeria, , Yeast & Mold Drinking Water I, s (+/- or Quant	Surf	face = SU	1	Swab = SW				
ADDION MATIOS DECUMENTOS DA AMENANTAS	ed),	Metal iquid)	Listeria east & M nking W +/- or Qu	Ta	ape = T		Wipe = W				
Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT	antifi I, ISC	, Multi Me Non-Liqui tals Scan	1-2), us, Ye er, Drii sid, cus (+		Drinki	ng Water	= DW				
	or Or	are), lid, N Metz	able, aure Wate tic A ococ ococ		Wast	e Water :	= WW				
Organics* SAME DAY RUSH PRIORITY STANDARD	135 (+/- ate L K +/-	Ödw; Full	State State Internal	**ASTM	1 E1792 a _l	pproved	wipe media on	ly**			
MICROBIOLOGY LABORATORY HOURS: Weekdays: 8am - 5pm	NRB4 ovac Yami	er, Fo), pH Scan	lla (C Plate coli (\$ ation), ID), i		(ton						
Viable Analysis** PRIORITY STANDARD	rt, C, , Micı , Wate	Wate ware ume , TSS	ms - ms - s/E. a ntific D, w,		r Aliq						
**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH	Repo ified) SH 7 king 1	/aste Food ing F mine	, Sall oliforn liforn Qua (wo/l		ea be						
Medical Device Analysis RUSH STANDARD	ong l	Meld Weld	cillus soli/C it, Co it, Co it, Co it, CA iount		or An						
MALLA ALL ALL DEPORTEY STANDARD	ort, L or Q (rited) (vater, OB, C	pirable (s) Pb 7420, ste Wate can, We namphe	r, Ba 7, E.c Coun Wate oal C rden,	ea a	idth(
Mold Analysis RUSH PRIORITY STANDARD	Repc 4, (+/ tuant ste W ste W	Res alyte 7082, Was A 8 S	bacte 57:H Plate (king ' king ' king ' crobi)/ Ar	×						
Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.	Short AHER, /- or G Id, Wa	Fotal Total (19)	Campylot E.coli O1t Areobic P Non-Drinl Viable Mis DICAL - B	ne (L	quots	ွ	p >	<u>B</u>			
Special Instructions:	- + ± e · ·	DUST - Total, METALS - An Lead Only (7 6020A, 200.8, TCLP, RCR/	Campi E.coli decobi Non-D Viable MEDICAL	Volur	or Ali	Code	Date Collected mm/dd/yy	Fime Collected	Laboratory Analysis		
opeoidi mon donono.	PLM- TEM- Wipe Chaff	MA COLOR	Viables Viables	mple.)dth(Matrix Code	ate C	me d	Instructions		
Client Sample ID Number (Sample ID's must be unique)	ASBESTOS	CHEMISTRY	MICROBIOLOGY	Sa	Le	Ma *	Δ -	F			
1 CDW1-1	X					В	03/26/20				
2 CDW1-2	X					В	03/26/20	<u>.</u>			
3 TEX1-1	X					В	03/26/20	ļ			
4 TEX1-2	X					В	03/26/20	ļļ			
5 TEX1-3	X	<u> </u>		ļ		В	03/26/20	ļļ			
6 DM1-1	X	<u> </u>		ļ		В	03/26/20	ļļ	PROG(A)		
7 DM1-2	X			ļ		В	03/26/20	ļļ	PROG(A)		
8 INS1-1	X			ļ		В	03/26/20	ļļ	PROG(B)		
9 INS1-2	X			ļ		В	03/26/20	ļļ	PROG(B)		
10 CBG1-1	X	ļļ		ļ		В	03/26/20	ļļ	PROG(C)		
11 CBG1-2	X	ļļ		ļ		В	03/26/20	ļļ	PROG(C)		
12 CK1-1	X	ļļ		ļ		В	03/26/20	ļļ	PROG(D)		
13 CK1-2	X					В	03/26/20		PROG(D)		

REI will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall consitute an analytical services agreement with payment terms of NET 30 days. Failure to comply with payment terms may result in a 1.5% monthly interest surcharge.

Relinquished By:	ed By:		Date/Time: 03/26/2020 17:42:48	Sample Condition: ACCEPTABLE - INTACT		
Received By:	Am	HANNA MARTI	Date/Time: 03/26/2020 17:43:12	Carrier: HAND		







April 01, 2020

Subcontractor Number:

Laboratory Report: RES 459663-2
Project #/P.O. #: AS20003-2
Project Description: CDOT Rangely

Jason Martin Foothills Environmental, Inc. (Lakewood) 11099 W. 8th Avenue Lakewood CO 80215

Dear Jason,

Reservoirs Environmental, Inc. is an analytical laboratory accredited for the analysis of Industrial Hygiene and Environmental matrices by the American Industrial Hygiene Association, Lab ID 101533 - Accreditation Certificate #480. The laboratory is currently proficient in both IHPAT & ELPAT programs respectively.

Reservoirs has analyzed the following sample(s) using Atomic Absorption Spectroscopy (AAS) / Atomic Emission Spectroscopy - Mass Spectrometry (ICP-MS) per your request. Reported sample results were not blank corrected. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results have been sent to your office.

RES 459663-2 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely,

Robin Klover Vice President

NVLAP Lab Code 101896-0 AIHA Certificate of Accreditation #480 LAB ID 101533

TABLE: I ANALYSIS: LEAD IN PAINT

RES Job Number: RES 459663-2

Client: Foothills Environmental, Inc. (Lakewood)

Client Project/P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Analysis Type: REI CHEMISTRY SOP / USEPA SW846 3050B/7420-M

Turnaround: Standard
Date Samples Analyzed: March 28, 2020

NR = Not Received ND = None Detected BAS = Below Analytical Sensitivity BRL = Below Reporting Limit

NA = Not Analyzed

Client ID Number	Reporting Limit (%)	LEAD CONCENTRATION (%)
Pb1-1	0.0040	BRL
Pb2-1	0.0029	BRL
Pb3-1	0.0045	0.011
Pb4-1	0.0049	BRL
Pb5-1	0.0056	BRL

^{*} Unless otherwise noted all quality control samples performed within specifications established by the laboratory

Analyst/Data QA



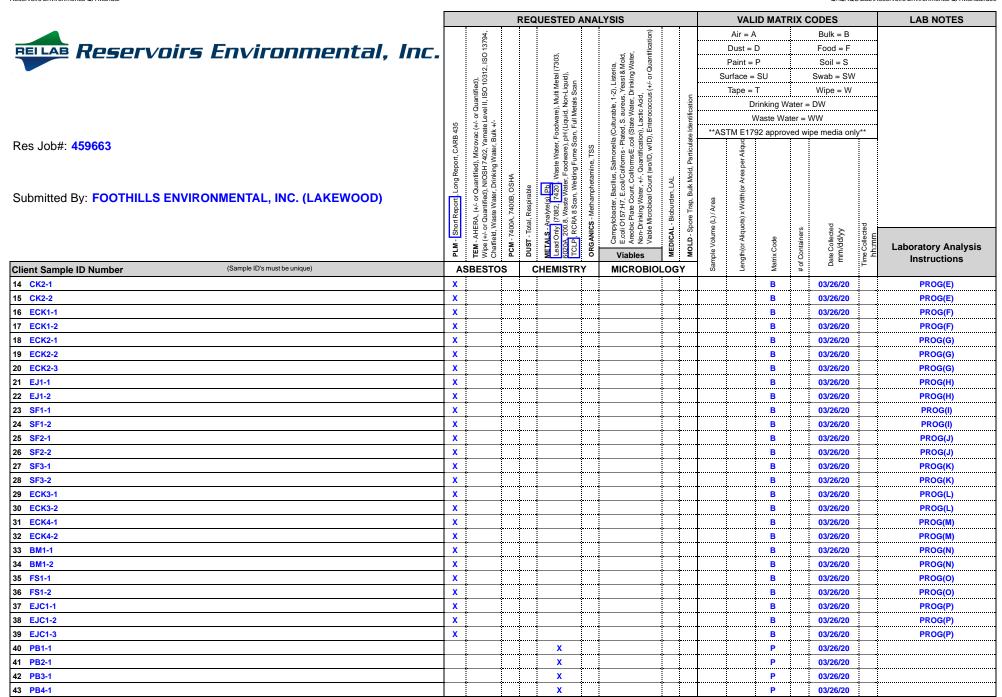
RES Job #: 4596	63

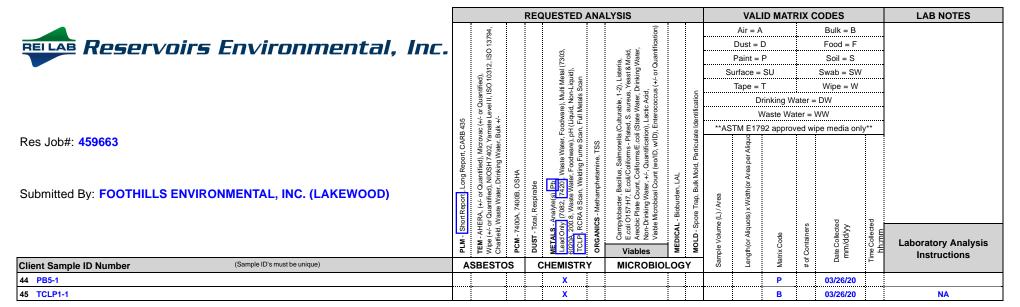
SUBMITTED BY			INVOICE 1	го	CONTACT	INFORMATION		SERIES
Company: FOOT	THILLS ENVIRONME	NTAL, INC. (LAKEWO	Company:	FOOTHILLS ENVIRONMENTAL, INC. (LAKEWO	Contact:	JASON MARTIN		-1 PLM STANDARD
Address: 1109	99 W. 8TH AVENUE		Address:	11099 W. 8TH AVENUE	Phone:	(720) 837-7312		-2 CHEM STANDARD -3 CHEM STANDARD
					Fax:			
LAKE	(EWOOD, CO 80215			LAKEWOOD, CO 80215	Cell:			
Project Number an	nd/or P.O. #:	AS20003-2			Final Data	Deliverable Email Address:		
Project Description/Location: CDOT RANGELY				JASON@FOOTHILLSUSA.COM (+ 1 ADDNL. CONTACTS)				

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm & Sat. 8am - 5pm		REQUESTED ANALYSIS			VALID MATRIX CODES				LAB NOTES
PLM / PCM / TEM DTL RUSH PRIORITY STANDARD				Ai	ir = A		Bulk = B		
	3794		ation	Du	ıst = D	Ī	Food = F		
CHEMISTRY LABORATORY HOURS: Weekdays: 8am - 5pm	SO 13	ý.	ntific ntific	Pai	int = P		Soil = S		
Dust RUSH PRIORITY STANDARD	12, 11	, (73	2), Listeria, , Yeast & Mold Drinking Water I, s (+/- or Quant	Surface = SU Swab = SW					
ADDIOD MOTION PROGRAMS DAYS AT	ed),	Metal iquid)	Listeria east & M nking W +/- or Qu	Tap	pe = T		Wipe = W		
Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT	l, ISC	, Multi Me Non-Liqui tals Scan	.1-2), us, Ye er, Drii cid, cus (+		Drinking	Water	= DW		
	or Qu	are), Jid, N Metz	able, aure Wate tic A ococ		Waste \	Nater =	WW		
Organics* SAME DAY RUSH PRIORITY STANDARD	435 :(+/- ate L k +/-	odw; (Liq.	State State Enter	**ASTM E1792 approved wipe media only**					
MICROBIOLOGY LABORATORY HOURS: Weekdays: 8am - 5pm	YRB, Yam Yam r, Bul	Scan	ella (C		(not)				
Viable Analysis** PRIORITY STANDARD	rrt, C, , Mic ,402, Wate	Wate ware ume	mone ms - ns/E. ntific ID, w.		r Alic				
**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH	Repo iffed) SH 7 king	Vaste Fooc ling F	s, Sall colifor difform (wo/		eape				
Medical Device Analysis RUSH STANDARD	Suant Suant NIC Drin	hera	cillus Soli/C it, Co it, Co it, Co it, Co it, Co		or An				
Model Analysis DUCH DDIODITY CTANDADD	ort, L - or C iffied) Vater	pirable (s) Pb 7420, 7420 can, We hamphe	er, Ba 7, E. 7, E. Cour Wate ioal C	ea	/dth/				
Mold Analysis RUSH PRIORITY STANDARD **Turnaround times establish a laboratory priority, subject to laboratory volume and are not	Report (+/ Suant ste V	, Res ralyte 7082, Was A 8 S	bacte 57:H Plate king king crobi siobu)/ Ar	× (6				
guaranteed. Additional fees apply for afterhours, weekends and holidays.**	Short VHER. Id, We	Total	Campylot E.coli O1t Areobic P Non-Drinl Viable Mis DICAL - B	ne (I	quots	ပ်	₽ >	ted	
Special Instructions:	- + ± •	DUST - Total, METALS - An Lead Only (7 6020A, 200.8, TCLP, RCR/	Campi E.coli i Areobi Non-D Viable	Volu	or Ali	ontaine	Date Collected mm/dd/yy	Fime Collected hb:mm	Laboratory Analysis
	PLM TEM Wipe Chaff	P N S S S S S S S S S S S S S S S S S S	Viables 🖁 💆	mple	Length(or Al Matrix Code	f Š	ate C mm/	me C	Instructions
Client Sample ID Number (Sample ID's must be unique)	ASBESTOS	CHEMISTRY	MICROBIOLOGY	Sa	S	#	۵	F	
1 CDW1-1	X				В		03/26/20	<u>.</u>	
2 CDW1-2	X				В		03/26/20	<u> </u>	
3 TEX1-1	X				В		03/26/20	<u> </u>	
4 TEX1-2	X				В		03/26/20	ļļ	
5 TEX1-3	X			ļ	В		03/26/20	ļļ	
6 DM1-1	X				В		03/26/20	ļļ	PROG(A)
7 DM1-2	X				В		03/26/20	ļļ	PROG(A)
3 INS1-1	X				В		03/26/20	ļļ	PROG(B)
9 INS1-2	X				В		03/26/20	ļļ	PROG(B)
10 CBG1-1	X			ļ	В		03/26/20	ļļ	PROG(C)
11 CBG1-2	X	ļļ		ļ	В		03/26/20	ļļ	PROG(C)
12 CK1-1	X	ļļ		ļ	В		03/26/20	ļļ	PROG(D)
13 CK1-2	X			:	В		03/26/20	1 1	PROG(D)

REI will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall consitute an analytical services agreement with payment terms of NET 30 days. Failure to comply with payment terms may result in a 1.5% monthly interest surcharge.

Relinquished By:	2-5	JASON MARTIN	Date/Time: 03/26/2020 17:42:48	Sample Condition: ACCEPTABLE - INTACT		
Received By:	Am	HANNA MARTI	Date/Time: 03/26/2020 17:43:12	Carrier: HAND		







April 06, 2020

Subcontractor Number:

Laboratory Report: RES 459663-3
Project #/P.O. #: AS20003-2
Project Description: CDOT Rangely

Jason Martin Foothills Environmental, Inc. (Lakewood) 11099 W. 8th Avenue Lakewood CO 80215

Dear Jason,

Reservoirs has analyzed the following sample(s) using Atomic Absorption Spectroscopy (AAS) / Atomic Emission Spectroscopy - Inductively Coupled Plasma (AES-ICP) per your request. Reported sample results were not blank corrected. The analysis has been completed in general accordance with the appropriate methodology as stated in the analysis table. Results have been sent to your office.

RES 459663-3 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Reservoirs Environmental, Inc. will not discuss any part of this study with personnel other than those of the client. The results described in this report only apply to the samples analyzed. This report must not be used to claim endorsement of products or analytical results by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without written approval from Reservoirs Environmental, Inc. Samples will be disposed of after sixty days unless longer storage is requested. If you have any questions about this report, please feel free to call 303-964-1986.

Sincerely,

Robin Klover Vice President

Roll & K

Reservoirs Environmental, Inc Reservoirs Environmental QA Manual

NA = Not Analyzed

NR = Not Received

ND = None Detected

BAS = Below Analytical Sensitivity

BRL = Below Reporting Limit

RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0 AIHA Certificate of Accreditation #480 LAB ID 101533

TABLE: I ANALYSIS: LEAD VIA TCLP EXTRACTION

RES Job Number: RES 459663-3

Client: Foothills Environmental, Inc. (Lakewood)

Client Project/P.O.: AS20003-2
Client Project Description: CDOT Rangely
Date Samples Received: March 26, 2020

Analysis Type: REI CHEMISTRY SOP / USEPA SW846 1311/3011A/7420-M

Turnaround: Rush

Date Samples Analyzed: April 06, 2020

Client	Reporting	LEAD CONCENTRATION		
ID Number	Limit			
	(mg/L)	(mg/L)		
TCLP1-1	0.25	BRL		

^{*} Unless otherwise noted all quality control samples performed within specifications established by the laboratory

Analyst/Data QA

RES Job #: 459663

REILAB Reservoirs Environmental, Inc.

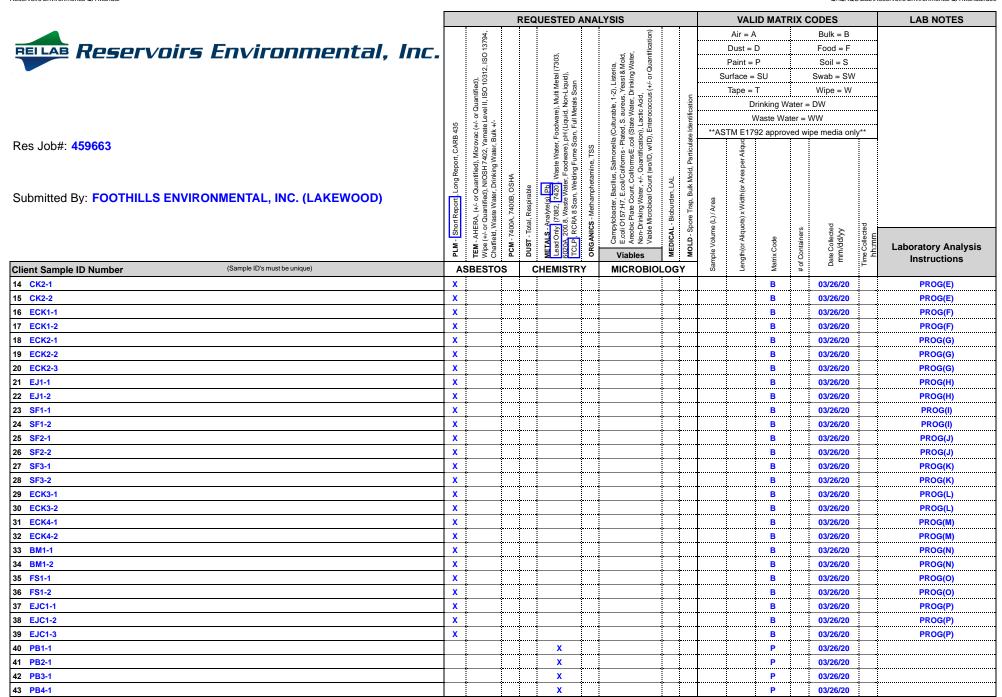
TANDARD STANDARD		

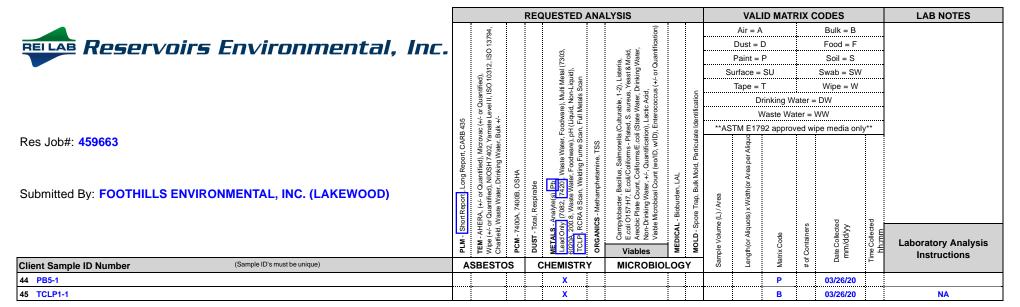
SUBMITTED BY	INVOICE TO	CONTACT INFORMATION	SERIES
Company: FOOTHILLS ENVIRONMENTAL, INC. (LAKEWO	Company: FOOTHILLS ENVIRONMENTAL, INC. (LAKEWO		-1 PLM STANDARD
Address: 11099 W. 8TH AVENUE	Address: 11099 W. 8TH AVENUE	Phone: (720) 837-7312	-2 CHEM STANDARD -3 CHEM STANDARD
		Fax:	
LAKEWOOD, CO 80215	LAKEWOOD, CO 80215	Cell:	
Project Number and/or P.O. #: AS20003-2		Final Data Deliverable Email Address:	
Project Description/Location: CDOT RANGELY		JASON@FOOTHILLSUSA.COM (+ 1 ADDNL. CONTACTS)	

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm & Sat. 8am - 5pm	F	EQUESTED ANA	LYSIS	\	ALID MA	TRIX (CODES		LAB NOTES
PLM / PCM / TEM DTL RUSH PRIORITY STANDARD			_	Ai	ir = A		Bulk = B		
	3794,		ation)	Du	ıst = D	Ī	Food = F		
CHEMISTRY LABORATORY HOURS: Weekdays: 8am - 5pm	9 6	ĝ	d, ntifics	Pai	int = P	Ī	Soil = S		
Dust RUSH PRIORITY STANDARD	12,8	, (730	eria, & Mold, g Water r Quanti	Surfa	ace = SU		Swab = SW		
	ad),	Meta quid) an	List Pkin H-o	Tap	pe = T		Wipe = W		
Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT	, ISO	Aulti I on-Li Is Sc	1-2), lis, Ye r, Drii id, sus (+		Drinking '	Water :	= DW		
	o P	id, No Meta	able, aureu Nate ic Ac ococc		Waste W	Vater =	WW		
Organics* SAME DAY RUSH PRIORITY STANDARD	35 (+/-0 te Le	Cliqu	ulture 1, S. e tate \ Lact nterc	**ASTM E1792 approved wipe media only**		ly**			
MICROBIOLOGY LABORATORY HOURS: Weekdays: 8am - 5pm	RB4	r, Foc , pH Scan,	la (C Plater oli (S rition) ID), E		not)			П	
Viable Analysis** PRIORITY STANDARD	Micra Micra 102, '	Wate vare) ime S	nonel ns - F s/E.c s/E.c trifica), w//		Alig				
**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH	epor ied), SH 74	aste ' 'ood' 'ng Fu	Salm form Quar wo/IE		a ber				
Medical Device Analysis RUSH STANDARD	and R NIOS Orink	iter, F Veldir	illus, oli/Co +/-, t ount (r Are				
	or Qued), after, [B, O;	pirable (s) Pb 7420, ste Wate can, We	Bac, E.cc ount, fater, lal Co	m	e) III				
Mold Analysis RUSH PRIORITY STANDARD	(+/- (antifice Water Wat	Respi lyte(s 182, Nast Nast 8 Sca	acter, 7:H7, ate C ng M ng M robio	/ Are	×				
**Turnaround times establish a laboratory priority, subject to laboratory volume and are not	ERA, or Qu Wast	Anal Anal (70 0.8, \textit{7.70}	yloba O15 O15 ic Pla Drinki Mici	(T) e	lots)		70	ъ	
guaranteed. Additional fees apply for afterhours, weekends and holidays.**	- Sh - AHE (+/- o ield, \	ANIC	amp coli lon-L lon-L iable ICAL	un lo	Aliqu	iners	ayy Ayy	m Ecte	
Special Instructions:	PLM - Wipe Chatfi	DUST - Total, METALS - An: Lead Only (7 6020A, 200.8, TCLP, RCR/	Viables Viables) Sec	th(or All x Code	Contain	Date Collected mm/dd/yy	ime Collected	Laboratory Analysis
Client Sample ID Number (Sample ID's must be unique)	ASBESTOS	CHEMISTRY	MICROBIOLOGY	Sam	Length Matrix	#of(Dat	Ë	Instructions
1 CDW1-1	X				В		03/26/20		
2 CDW1-2	X				В		03/26/20		
3 TEX1-1	X				В		03/26/20		
4 TEX1-2	X				В		03/26/20		
5 TEX1-3	X				В		03/26/20		
6 DM1-1	X				В		03/26/20		PROG(A)
7 DM1-2	X				В		03/26/20		PROG(A)
8 INS1-1	X				В		03/26/20		PROG(B)
9 INS1-2	X				В		03/26/20		PROG(B)
10 CBG1-1	X				В		03/26/20		PROG(C)
11 CBG1-2	X				В		03/26/20		PROG(C)
12 CK1-1	X				В		03/26/20		PROG(D)
13 CK1-2	X				В		03/26/20		PROG(D)

REI will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall consitute an analytical services agreement with payment terms of NET 30 days. Failure to comply with payment terms may result in a 1.5% monthly interest surcharge.

Relinquished By:	2-5	JASON MARTIN	Date/Time: 03/26/2020 17:42:48	Sample Condition: ACCEPTABLE - INTACT			
Received By:	Am	HANNA MARTI	Date/Time: 03/26/2020 17:43:12	Carrier: HAND			





Appendix C

Photographs

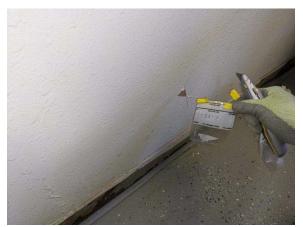


Sample: CDW1-1 - Composite drywall, joint compound and surface texture (orange peel) Result: Non-Detect



Sample: INS1-1 - Insulation, fiberglass

Result: Non-Detect



Sample: TEX1-1 - Drywall surface texture

(orange peel) Result: Non-Detect



Sample: CBG1-1 - Vinyl cove base, 4" gray

with tan mastic Result: Non-Detect



Sample: DM1-1 - Duct mastic, gray

Result: Non-Detect



Sample: CK1-1 - Caulk, red

Result: Non-Detect



Sample: CK1-1 - Caulk, white

Result: Non-Detect



Sample: ECK1-1 - Exterior caulk, silver

Result: Non-Detect



Sample: ECK2-1 - Exterior caulk, white

Result: Non-Detect



Sample: EJ1-1 - Expansion joint material Result: Non-Detect



Sample: SF1-2 - Screw flashing

Result: Non-Detect



Sample: SF2-1 - Screw flashing Result: Non-Detect



Sample: SF3-1 - Screw flashing

Result: Non-Detect



Sample: ECK3-1 - Exterior caulk, butyl gray

Result: Non-Detect



Sample: ECK4-1 - Exterior caulk, butyl gray Result: Non-Detect



Sample: BM1-1 - Black roofing mastic

Result: Non-Detect



Sample: FS1-1 - Foundation sealant, black

Result: Non-Detect



Sample: EJC1-1 - Expansion joint caulk, light

gray

Result: Non-Detect

Appendix D

Certifications



Colorado Department of Public Health and Environment

ASBESTOS CONSULTING FIRM

This certifies that

Foothills Environmental, Inc.

Registration No.: ACF - 14925

Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued: January 29, 2020

Expires: January 30, 2021

Authorized APCD Representative

SEAL



Colorado Department of Public Health and Environment

Lead Evaluation Firm Certificate

This certifies that

Foothills Environmental, Inc.

LEF No.: 14927

has met the requirements of 25-7-1104, C.R.S. and Air Quality Control Commission Regulation No. 19, and is hereby certified by the state of Colorado to perform lead-based paint evaluation activities in the state of Colorado.

Issued: August 21, 2019

Expires: August 21, 2020

Authorized APCD Representative

SEAL



Colorado Department of Public Health and Environment

ASBESTOS CERTIFICATION*

This certifies that

Jason Martin

Certification No.: 16218

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued:

December 27, 2019

Expires:

February 28, 2021

* This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.

Authorized APCD Representative

SEAL



7959 Ulster Court, Thornton, Colorado 80602 Tel: 303.424.4647

CERTIFIES THAT

JASON MARTIN

Has successfully completed

The EPA-Approved AHERA Annual Refresher Course for INSPECTOR This

course is EPA-approved under Section 206 of the Toxic Substances Control Act (TSCA) and

meets the requirements of Colorado Regulation No. 8.

Course Date:

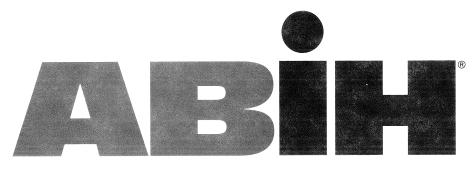
Exam Date:

Certificate No.: Expiration Date:

12/04/19

AE19-054-BI-R-02 12/04/20

K. Jay Gale, President



american board of industrial hygiene®

organized to improve the practice of industrial hygiene proclaims that

Jason Allen Martin

having met all requirements of education, experience and examination, is hereby certified in the

COMPREHENSIVE PRACTICE of INDUSTRIAL HYGIENE

and has the right to use the designations

CERTIFIED INDUSTRIAL HYGIENIST

CIH

Certificate Number

11461 CP

Awarded:

November 29, 2017

Expiration Date:

June 1, 2023



Chair, ABIH

Chief Executive Officer, ABIH