

ASBESTOS INVESTIGATION REPORT

for

**Former China Delight
1632 Hwy 25B
Heber Springs, Arkansas 72543**

PROJECT NO. 21-0111-082

Prepared for:

Mr. Christopher Newton
Alt Witzig Engineering, Inc.
4105 West 99th Street
Carmel, Indiana 46032

June 14, 2021

Prepared for

Mr. Christopher Newton
Alt Witzig Engineering, Inc.
4105 West 99th Street
Carmel, Indiana 46032

The following pages of this Asbestos Investigation report have been prepared for the exclusive use of Alt Witzig Engineering, Inc. at the request of Mr. Christopher Newton. The property surveyed is described as the former China Delight located at 1632 Hwy 25B in Heber Springs, Arkansas.

Performed by:



Mr. Greg Millsaps (ADEQ #015533)
Environmental Professional/Asbestos Inspector
Environmental Enterprise Group, Inc. (EEG)

6/14/21

Date

Senior Review:



Mr. Bob E. Smith
Vice President/Senior Project Manager
Environmental Enterprise Group, Inc. (EEG)

6/14/21

Date

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1.0 EXECUTIVE SUMMARY

1.1 INTRODUCTION

ENVIRONMENTAL ENTERPRISE GROUP, INC. (EEG) (Arkansas Department of Environmental Quality (ADEQ) Asbestos Abatement Consultant Certification No. 000234) was retained by Alt Witzig Engineering, Inc. to conduct an inspection for suspect asbestos-containing materials (ACM) at the above-referenced property located in Heber Springs, Arkansas. The inspection included the assessment of suspect friable and non-friable ACM. Although a complete inspection was conducted, roofing materials currently not scheduled to be impacted during the planned renovation activities were cataloged and not analyzed at the client's request. The samples will be available for analysis for a limited time if it is determined that roofing materials will be disturbed.

The purpose of this survey was to locate, identify, sample and assess the condition of accessible materials found throughout the former China Delight at 1632 Hwy 25B located in Heber Springs, Arkansas, that were suspected of containing more than one percent (1%) asbestos. The investigation took place at the request of Mr. Christopher Newton of Alt Witzig Engineering, Inc. and was conducted by Greg Millsaps, Environmental Professional/Asbestos Inspector, Certification No. 015533, on June 2, 2021.

In order to ensure a safe and healthy work environment, Federal, State and local regulations require that ACM be identified and controlled. This asbestos investigation report provides the basis for an Operations and Maintenance (O&M) Plan.

1.2 BUILDING DESCRIPTION

The former China Delight, built in 1980 with an addition in 1998, contains approximately 3,632 square feet and is constructed of cinderblock and wood framing with cinderblock and brick exterior walls and a built-up and metal roof. The interior walls are drywall, vinyl and wood paneling. The building sits on a concrete foundation and utilizes a natural gas and electric HVAC system.

1.3 FINDINGS

As suspect ACM was identified, they were classified as either friable or non-friable. Friable materials are more hazardous than non-friable materials because they are more likely to release fibers into the air. In assessing the fiber release potential, the current condition of all ACM was noted. Evidence of deterioration, physical or water damage and the potential for future disturbance were taken into consideration. The potential of erosion of the ACM due to air disturbance, high vibration or contact was also noted.

None of the samples analyzed contained concentrations of asbestos in excess of the EPA Regulatory limit of greater than one percent asbestos (>1%).

2.0 MATERIAL ASSESSMENT & RECOMMENDATIONS

2.1 ASBESTOS CONTAINING MATERIALS

None of the samples analyzed contained concentrations of asbestos in excess of the EPA Regulatory limit of greater than one percent asbestos ($>1\%$).

3.0 ESTIMATED COST FOR REMOVAL

None of the samples analyzed contained concentrations of asbestos in excess of the EPA Regulatory limit of greater than one percent asbestos (>1%).

3.1 ASSUMED ASBESTOS CONTAINING MATERIALS

All suspect materials identified were sampled. No building materials were assumed to be asbestos containing. However, at the client's request, roof samples were collected but not analyzed. The roofing must be assumed to be asbestos containing until analytical evidence proves otherwise.

3.2 MATERIALS SAMPLED, ANALYZED AND FOUND TO BE NON-ASBESTOS CONTAINING MATERIALS

The following samples, found in the former China Delight, were suspected of being asbestos-containing, but sampling and analytical testing showed asbestos concentrations of less than or equal to one percent (1%). These materials are:

MATERIAL	SAMPLE LOCATION
Vinyl Plank Flooring & Mastic	Dining Room 2 & Drinks Area
Covebase & Mastic	Restroom Hallway & Dining Room 1
Drywall System	Storage (1980 Portion)
Drywall System	Restroom Hallway (1998 Portion)
White 2' x 2' Ceiling Tile	Dining Room 1 & Dining Room 2
White 2' x 4' Ceiling Tile	Restroom Hallway, Women's Restroom & Men's Restroom
Built-Up Roof	Roof (1980 Portion)
Roof Penetration Mastic	Roof (1980 Portion)
White Roof Coating	Roof (1998 Portion)
Roof Penetration Mastic	Roof (1998 Portion)

3.3 BUILDINGS/AREAS ASSESSED BUT WITH NO SUSPECT MATERIALS

All areas of the former China Delight were assessed for suspect asbestos-containing materials. However, although a complete inspection was conducted, roofing materials that will not be impacted during upcoming renovation activities were cataloged and not analyzed at the client's request. The samples will be available for analysis for a limited time if it is determined that roofing materials will be disturbed.

3.4 MATERIALS CONSIDERED TO BE NON-SUSPECT BY USEPA

- Concrete Slab Walls and Concrete Roofing
- Wood Structures and Beams
- Fiberglass Bat Insulation Panels
- Fiberglass Pipe Insulation
- Fiberglass Tank Insulation
- Fiberglass Wall Insulation
- Cinder Block Walls
- Non-Insulated Piping
- Sheet Metal Ceilings and Walls
- Brick on Walls and Floors
- Ceramic Tiles on Floors and Walls
- Carpet
- Wood Paneling
- Epoxy Flooring Material
- Synthetic Glass Block Pipe Insulation
- Fiberglass and Metal HVAC Ductwork
- Steel and Sheet Metal Storage Buildings
- Steel and Sheet Metal Storage Tanks

4.0 METHODOLOGY

Asbestos is a naturally occurring fibrous mineral that has many beneficial properties. It is resistant to acids and heat and does not conduct electricity or heat well. It is because of these features that it was widely used in buildings constructed prior to 1975. Asbestos was used in over 3,000 types of construction materials.

The Asbestos Hazard and Emergency Response Act (AHERA) is a Federal law that describes standard methods for asbestos inspections. The AHERA addresses the hazard of asbestos in schools and grants no jurisdictional powers to any branch of government for the regulation of asbestos in any facility other than a school. This asbestos investigation satisfies the inspection requirements outlined in the Occupational Safety and Health Administration (OSHA) 29 CFR 1910.1001 and 1926.1101. An Operations and Maintenance (O&M) Plan will be implemented from this asbestos investigation. This asbestos investigation also satisfies requirements specified under the Environmental Protection Agency (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAPS) 40 CFR Part 61 that states a survey must be performed identifying friable and non-friable ACM in a building prior to renovation or demolition. However, you may elect to collect and analyze additional samples of affected materials at the time of renovation or demolition.

4.1 HOMOGENEOUS AREAS

The site was inspected for the presence of materials that may contain asbestos. These materials were then described and categorized by homogeneous area (HA). The AHERA defines "homogeneous area" as an area of surfacing material, thermal system insulation material or miscellaneous material that is uniform in color, texture and date of material application. During the building inspection, the inspector classifies all materials by "homogeneous area." Homogeneous area might be better understood as a homogeneous material, since there is no requirement that a homogeneous area be contiguous or continuous. An example of this might be a building that has a single type of floor tile. All floor tile in the building would be considered a single "homogeneous area" regardless of where it is located because it is uniform in color, texture and date of material application.

4.2 INSPECTION AND SAMPLING

4.2.1 Inspection Methods

The building inspection was performed as follows:

1. A visual determination of the quantity and condition of suspect materials in the facility.
2. A physical "hand pressure" test for determining the condition of suspect materials.
3. Sampling and documentation of observable suspect materials according to EPA guidelines.
4. Measurement of all observable material sampled to determine the quantity existing within the facility. The quantity is determined by a visual inspection and/or by blueprint examination.

4.2.2 Sampling Strategies

1. As much as possible, sampling was conducted in unoccupied areas such as mechanical rooms, pipe chases and closets.
2. Samples of each material were collected according to material type, color and texture. If a suspect material such as corrugated pipe covering was found in an unoccupied area on a floor, those samples were used to represent the material throughout the building as long as the appearance did not change.
3. In a general assessment, pipe covering and mudded joint packings are sampled and measured as homogeneous material unless otherwise noted. Each homogeneous material was randomly sampled three times. When different suspect asbestos-containing thermal insulation was identified, three additional random samples of the homogeneous material were collected.
4. In this assessment, three composite samples were collected of all non-homogeneous materials or materials where asbestos was not easily identifiable such as:
 - mudded joint fittings, especially those on fiberglass-insulated lines
 - mudded packings on boilers, tanks, breechings, or ducts
5. Sampling was generally the last thing performed in each area after pressure testing, measuring, assigning sample numbers and evaluating the priority level.
6. All cementitious and miscellaneous suspect materials were sampled and noted as to location and quantity.

4.2.3 Sampling Procedures

The bulk samples were obtained with a stainless steel coring tool or knife designed to make clean cores of friable material to avoid creating excessive dust. The area was pre-wetted to reduce fiber generation during the sampling process. The coring tool or knife was used rather than scratching a sample from the surface of the suspect material in an effort to obtain a sample that was representative of all layers of the material.

Samples of materials such as ceiling tile, wallboard, floor tile, etc., are generally obtained with a utility knife. Frequently, a small, broken piece of these materials can be found and used as a sample.

4.2.4 Chain of Custody Procedures

A copy of the chain of custody that accompanied the samples is supplied in the Analytical Results Appendix. The inspector filled out the chain of custody form after all samples were collected and before the samples were shipped to the laboratory. When the laboratory received the samples, the chain of custody was transferred to the laboratory.

4.3 ASSESSMENT LOGIC

4.3.1 Priority Level Determination

As a result of the inspection and laboratory analysis of the bulk samples collected, EEG has generated a priority level for ACM that follows AHERA guidelines. The AHERA guidelines recognize seven levels of hazard associated with asbestos based on six primary variables: material condition; water damage; exposed surface area; accessibility; activity/movement; and air plenum/direct air stream.

Material condition refers to the condition of the material at the time of the inspection. Factors included are the quality of installation, adhesion of the material to the underlying substrate, deterioration of the outer covering, de-lamination, contact damage and material disintegration.

Water damage relates to the potential for water to dislodge, delaminate and disturb materials. Water damage weakens the binding matrix of the material and can carry fibers in a slurry to other areas of the building where they can become airborne.

The exposed surface area of friable material has an effect on potential fiber fallout levels and the possibility for contact and damage. A useful criterion in determining exposed surface areas is visibility of the friable asbestos material. Materials usually fall into one of the following categories: out in the open (fully exposed); above or behind a semi-permanent enclosure such as a wall, ceiling, or floor; and above or behind a permanent enclosure. Areas with louvers, grids or other open ceiling systems are considered exposed.

Accessibility of the material is a function of proximity. If the material can be reached, it is accessible and subject to accidental or intentional contact damage.

In the variable of activity and movement, occupancy and mechanical vibrations are two important factors to consider. High-occupancy areas are subject to more vibration from noise and physical movement; therefore, a greater ambient fiber release can be expected. This variable also plays an important role in determining abatement priority. Mechanical vibrations, especially in boiler mechanical rooms, not only create ongoing ambient fiber release, but when the system is turned on or off there is a sudden burst of mechanical and air movement that creates a brief peak exposure.

The category of air plenum/direct air stream refers to potential or existing air movement. A direct air stream moving across the material erodes the material, thereby releasing fibers into the air. If the area in question forms a supply air plenum, there is usually increased exposure to building occupants since the contaminated air is blown directly into rooms of the building. Return air plenums do not create quite as high an exposure potential as supply air plenums, but do contribute to the exposure of maintenance and mechanical workers accessing these areas. A value is given to this variable if there is a real or potential air stream at the time of the inspection. A fan, present but not in use at the time of the survey, is an example of a potential air stream.

Two sub-variables are asbestos content and friability. Friability is the ease with which material can be crumbled, pulverized or reduced to powder when dry, by hand pressure. The more friable the material, the greater the potential is for fiber release and contamination. The asbestos content is factored based on the analytical results of samples from a homogeneous sampling area. Materials with a high percentage of asbestos contain more fibers for potential release and contamination of the building.

The *Decision Logic Flow Chart for Hazard Assessments*, located in the appendix section of this report, shows the decision logic used to classify ACM by AHERA guidelines.

4.3.2 Priority Level Interpretation

High Priority materials are generally those that have been severely damaged. Removal is the corrective action suggested for most High Priority materials. Removal is the only permanent solution to asbestos-related problems.

Moderate Priority materials have a lower exposure potential than High Priority materials. However, they still represent a significant exposure potential. EEG recommends implementing a corrective action plan to reduce the high exposure potentials that exist in these areas. Depending on the funds available, the corrective action plan may involve complete removal, or selective removal in conjunction with the cleaning up of debris that may exist and the repair of any damaged areas. Removal also eliminates future exposure incidents that may cause the building owners to incur additional liability. Any past liability the building owner has incurred as a result of an occupant's exposure to ACM will not be altered.

Low Priority materials either have a low friability or are located in inaccessible areas and are not expected to create a serious or immediate exposure potential. However, as materials deteriorate with time, a corrective action plan should be devised to minimize future asbestos exposure potential. The most effective means of reducing deterioration and accidental disturbance of ACM is the development of an Operations and Maintenance (O&M) Program. This is an interim control measure designed to train custodial and maintenance personnel, establish emergency abatement and control procedures, develop a periodic program to re-inspect the materials, and to provide the necessary supplies and equipment to perform these tasks.

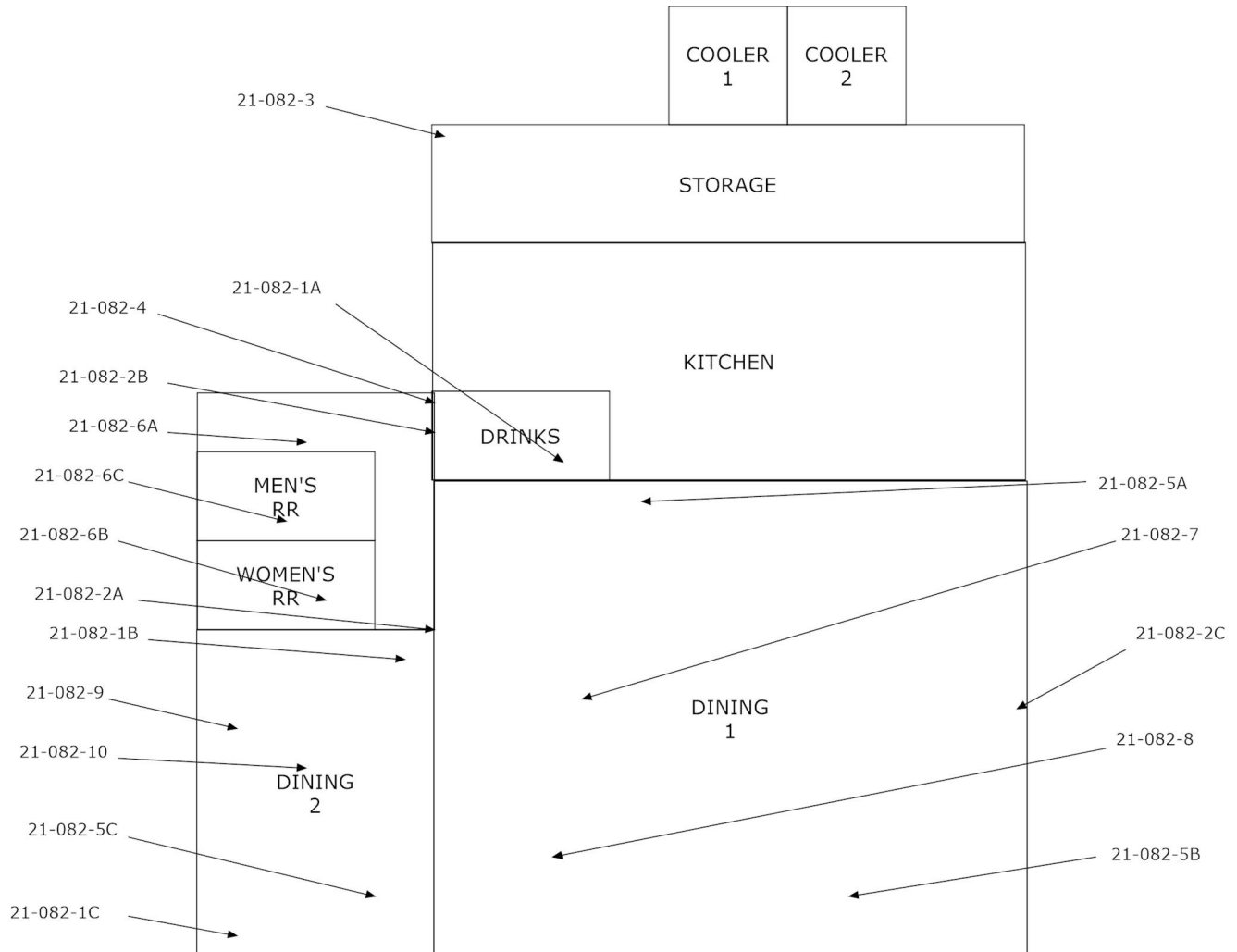
Non-friable building materials do not create the potential for asbestos exposure unless they are sawed, broken, ripped or pulverized. However, even materials that are well wrapped and technically non-friable at the time of inspection have the potential to become friable very readily by accidental tearing or other disturbance (e.g., water damage, grinding, drilling, sawing, etc.). This report addresses friable and potentially friable materials.

The *Decision Logic Flow Chart for Hazard Assessments*, located in the appendix section of this report, shows the priority level associated with each hazard level using AHERA guidelines. The chart also shows the action recommended for each hazard level.

APPENDICES

Drawings

FORMER CHINA DELIGHT



SAMPLE LOCATIONS

Project #21-0111-082

EEG
Environmental
Enterprise Group, Inc.

Former China Delight
1632 Hwy 25B
Heber Springs, AR 72543

Analytical Results



Environmental
Enterprise Group, Inc.

Asbestos Sampling Chain of Custody/ Field Data Sheet

21-0111-082

CLIENT

Alt Witzig Engineering, Inc.
4105 West 99th Street
Carmel, Indiana 46032

PROPERTY

Former China Delight
1632 Hwy 25B
Heber Springs, Arkansas 72543

Inspector

Greg Millers
6/2/21
Former China Delight
Turnaround Time Normal

SAMPLE ID	HA	SAMPLE DESCRIPTION (FT1 - 12 x 12 White Floor Tile)	C	1/2	SAMPLE LOCATION	A	C	CLASS ◆ (S, T, M)	FRIABILITY (F, NF)	COND (G, D, SD)	DAMAGE (%)	POT DAM (L, M, H)	QTY
21-082-1A	1	Vinyl Plank Flooring			Dining Room 2	✓		M	NF	G	0	H	
1B	1	↓			↓		✓	↓	↓	↓	↓	↓	
1C	1	↓			Drinks Area		✓	↓	↓	↓	↓	↓	
21-082-2A	2	Covebase + Mastic			Restroom Hallway	✓		M	NF	G	0	H	
2B	1	↓			↓		✓	↓	↓	↓	↓	↓	
2C	1	↓			Dining Room 1		✓	↓	↓	↓	↓	↓	
21-082-3	3	Drywall - 1980's Portion of the Building			Storage	✓		M	NF	G	0	H	
21-082-4	4	Drywall - 1998 Portion of the Building			Restroom Hallway	✓		M	NF	G	0	H	
21-082-5A	5	CT1 - 2x2 White Ceiling Tile			Dining Room 1	✓		M	F	G	0	H	
5B	1	↓			↓		✓	↓	↓	↓	↓	↓	
5C	1	↓			Dining Room 2		✓	↓	↓	↓	↓	↓	
21-082-6A	6	CT2 - 2x4 White Ceiling Tile			Restroom Hallway	✓		M	F	G	0	H	
6B	1	↓			Women's Restroom		✓	↓	↓	↓	↓	↓	
6C	1	↓			Mens Restroom		✓	↓	↓	↓	↓	↓	
21-082-7	7	Built up Roof - 1980's			Roof	✓		M	NF	G	0	M	
21-082-8	8	Roof Penetration Mastic - 1980's			↓		✓	M	NF	G	0	M	
21-082-9	9	White Roof Coating - 1998			↓		✓	M	NF	G	0	M	
21-082-10	10	Roof Penetration Mastic - 1998			↓		✓	M	NF	G	0	M	

◆ - Analyze only if the previous sample was found to be negative

C 1/2 - ACM Category 1 or 2

A - Analyze

C - Catalogue

Relinquished by

Greg Millers

Time 17:30

Date 6/2/21

Relinquished by

Time

Date

Received by

Time 0800

Date 6/3/21

Received by

Time

Date

Comments Catalog B+C Samples, also 7,8,9+10

B2021-0274

Asbestos Report Summary

By: POLARIZED LIGHT MICROSCOPY

Client: Environmental Enterprise Group, Inc.

Client Project: 21-0111-082

Job Number: 00001-B2021-0274

Date Reported: 06/10/2021

METHOD: EPA-600/R-93/116

Location: Former China Delight / 1632 Hwy 25B - Heber Springs, AR

Client Sample ID	Layer	Color	Sample Description		ASBESTOS %
21-082-1A	1	Gray / Tan	Vinyl Plank Flooring	Dining Room 2	None Detected
21-082-1A	2	Tan	Mastic	Dining Room 2	None Detected
21-082-2A	1	Gray / Black	Cove Base	Restroom Hallway	None Detected
21-082-2A	2	Yellow	Cove Base Mastic	Restroom Hallway	None Detected
21-082-3	1	White / Brown	Drywall	1980's Portion of Bldg. / Storage	None Detected
21-082-3	2	White	Drywall Tape	1980's Portion of Bldg. / Storage	None Detected
21-082-3	3	White	Joint Compound	1980's Portion of Bldg. / Storage	None Detected
21-082-3	4	White / Brown	Composite Analysis	1980's Portion of Bldg. / Storage	None Detected
21-082-4	1	White / Brown	Drywall	1998 Portion of Bldg. / Restroom Hallway	None Detected
21-082-4	2	White	Drywall Tape	1998 Portion of Bldg. / Restroom Hallway	None Detected
21-082-4	3	White	Joint Compound	1998 Portion of Bldg. / Restroom Hallway	None Detected
21-082-4	4	White / Brown	Composite Analysis	1998 Portion of Bldg. / Restroom Hallway	None Detected
21-082-5A	NA	White / Off White	Ceiling Tile	Dining Room 1	None Detected
21-082-6A	NA	White / Off White	Ceiling Tile	Restroom Hallway	None Detected

Client: Environmental Enterprise Group, Inc.

Client Project: 21-0111-082

Methodology: EPA-600/R-93/116

Sample(s) Taken From: Former China Delight / 1632 Hwy 25B - Heber Springs, AR

Received: 6/3/2021

Shipped Via: G. Millsaps

Job Number: 00001-B2021-0274

Sampled By: Greg Millsaps

Date Sampled: 6/2/2021

Reported: 6/10/2021

Bulk Asbestos Report

Sample # 1	Client Sample ID: 21-082-1A	Layered 1	Analysis None Detected	This material contains approximately	
				Calcite 55%	Quartz 1%
				Particulate Matter 44%	
Sample Description: Gray / Tan Vinyl Plank Flooring Dining Room 2					

Sample # 1	Client Sample ID: 21-082-1A	Layered 2	Analysis None Detected	This material contains approximately	
				Cellulose 1%	Synthetic Fiber <1%
				Calcite 7%	Quartz 4%
				Particulate Matter 88%	
Sample Description: Tan Mastic Dining Room 2					

Sample # 4	Client Sample ID: 21-082-2A	Layered 1	Analysis None Detected	This material contains approximately	
				Cellulose <1%	Calcite 30%
				Quartz 1%	Particulate Matter 69%
Sample Description: Gray / Black Cove Base Restroom Hallway					

Sample # 4	Client Sample ID: 21-082-2A	Layered 2	Analysis None Detected	This material contains approximately	
				Cellulose <1%	Synthetic Fiber <1%
				Calcite 10%	Quartz 2%
				Particulate Matter 88%	
Sample Description: Yellow Cove Base Mastic Restroom Hallway					

Current information listed above applies to the standards or procedures identified and the samples actually tested. The methodology(s) listed in this report is the only methodology(s) used. Each percentage reported above is a visual estimation of total composition, unless otherwise noted in this report. Asbestos detection limit is less than 1 percent. Test measurements are traceable to Standard Reference Material 1866a and 1867. The results are valid only for the materials tested. The information listed above is for the exclusive use of the client listed above. Sample results shall not be reproduced in any form or fashion for advertising or other purposes in connection with EEG's name or signature without consent from EEG. Sample results shall not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples not consumed in analysis will be retained for a maximum of 30 days. Samples may be returned to the client upon request. Accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of Accreditation under NVLAP code 101587-0.

Client: Environmental Enterprise Group, Inc.

Client Project: 21-0111-082

Methodology: EPA-600/R-93/116

Sample(s) Taken From: Former China Delight / 1632 Hwy 25B - Heber Springs, AR

Received: 6/3/2021

Shipped Via: G. Millsaps

Job Number: 00001-B2021-0274

Sampled By: Greg Millsaps

Date Sampled: 6/2/2021

Reported: 6/10/2021

Bulk Asbestos Report

Sample # 7	Client Sample ID: 21-082-3	Layered 1	Analysis None Detected	This material contains approximately	
				Cellulose 15%	Quartz 1%
				Gypsum Mortar 75%	Particulate Matter 9%
Sample Description: White / Brown Drywall 1980's Portion of Bldg. / Storage					

Sample # 7	Client Sample ID: 21-082-3	Layered 2	Analysis None Detected	This material contains approximately	
				Cellulose 98%	Calcite 1%
				Particulate Matter 1%	
Sample Description: White Drywall Tape 1980's Portion of Bldg. / Storage					

Sample # 7	Client Sample ID: 21-082-3	Layered 3	Analysis None Detected	This material contains approximately	
				Cellulose <1%	Calcite 65%
				Mica 4%	Quartz 1%
				Particulate Matter 30%	
Sample Description: White Joint Compound 1980's Portion of Bldg. / Storage					

Sample # 7	Client Sample ID: 21-082-3	Layered 4	Analysis None Detected	This material contains approximately	
				Cellulose 29%	Calcite 13%
				Mica 1%	Quartz 1%
				Gypsum Mortar 45%	Particulate Matter 11%
Sample Description: White / Brown Composite Analysis 1980's Portion of Bldg. / Storage					

Current information listed above applies to the standards or procedures identified and the samples actually tested. The methodology(s) listed in this report is the only methodology(s) used. Each percentage reported above is a visual estimation of total composition, unless otherwise noted in this report. Asbestos detection limit is less than 1 percent. Test measurements are traceable to Standard Reference Material 1866a and 1867. The results are valid only for the materials tested. The information listed above is for the exclusive use of the client listed above. Sample results shall not be reproduced in any form or fashion for advertising or other purposes in connection with EEG's name or signature without consent from EEG. Sample results shall not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples not consumed in analysis will be retained for a maximum of 30 days. Samples may be returned to the client upon request. Accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of Accreditation under NVLAP code 101587-0.

Client: Environmental Enterprise Group, Inc.

Client Project: 21-0111-082

Methodology: EPA-600/R-93/116

Sample(s) Taken From: Former China Delight / 1632 Hwy 25B - Heber Springs, AR

Received: 6/3/2021

Shipped Via: G. Millsaps

Job Number: 00001-B2021-0274

Sampled By: Greg Millsaps

Date Sampled: 6/2/2021

Reported: 6/10/2021

Bulk Asbestos Report

Sample # 8	Client Sample ID: 21-082-4	Layered 1	Analysis None Detected	This material contains approximately	
				Cellulose 10%	Quartz 1%
				Gypsum Mortar 80%	Particulate Matter 9%
Sample Description: White / Brown Drywall 1998 Portion of Bldg. / Restroom Hallway					

Sample # 8	Client Sample ID: 21-082-4	Layered 2	Analysis None Detected	This material contains approximately	
				Cellulose 98%	Calcite 1%
				Particulate Matter 1%	
Sample Description: White Drywall Tape 1998 Portion of Bldg. / Restroom Hallway					

Sample # 8	Client Sample ID: 21-082-4	Layered 3	Analysis None Detected	This material contains approximately	
				Cellulose <1%	Calcite 70%
				Mica 3%	Quartz 1%
				Particulate Matter 26%	
Sample Description: White Joint Compound 1998 Portion of Bldg. / Restroom Hallway					

Sample # 8	Client Sample ID: 21-082-4	Layered 4	Analysis None Detected	This material contains approximately	
				Cellulose 26%	Calcite 14%
				Mica 1%	Quartz 1%
				Gypsum Mortar 48%	Particulate Matter 10%
Sample Description: White / Brown Composite Analysis 1998 Portion of Bldg. / Restroom Hallway					

Current information listed above applies to the standards or procedures identified and the samples actually tested. The methodology(s) listed in this report is the only methodology(s) used. Each percentage reported above is a visual estimation of total composition, unless otherwise noted in this report. Asbestos detection limit is less than 1 percent. Test measurements are traceable to Standard Reference Material 1866a and 1867. The results are valid only for the materials tested. The information listed above is for the exclusive use of the client listed above. Sample results shall not be reproduced in any form or fashion for advertising or other purposes in connection with EEG's name or signature without consent from EEG. Sample results shall not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples not consumed in analysis will be retained for a maximum of 30 days. Samples may be returned to the client upon request. Accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of Accreditation under NVLAP code 101587-0.



Respectfully Submitted,
 EEG, Inc

Analyst

NVLAP Signatory

Client: Environmental Enterprise Group, Inc.

Client Project: 21-0111-082

Methodology: EPA-600/R-93/116

Sample(s) Taken From: Former China Delight / 1632 Hwy 25B - Heber Springs, AR

Received: 6/3/2021

Shipped Via: G. Millsaps

Job Number: 00001-B2021-0274

Sampled By: Greg Millsaps

Date Sampled: 6/2/2021

Reported: 6/10/2021

Bulk Asbestos Report

Sample # 9	Client Sample ID: 21-082-5A	Layered No	Analysis None Detected	This material contains approximately	
				Cellulose 45%	Mineral Wool 20%
				Quartz 1%	Perlite 20%
				Particulate Matter 14%	
Sample Description: White / Off White Ceiling Tile Dining Room 1					

Sample # 12	Client Sample ID: 21-082-6A	Layered No	Analysis None Detected	This material contains approximately	
				Cellulose 45%	Mineral Wool 25%
Sample Description: Ceiling Tile Restroom Hallway	White / Off White			Quartz 1%	Perlite 15%
				Particulate Matter 14%	

Current information listed above applies to the standards or procedures identified and the samples actually tested. The methodology(s) listed in this report is the only methodology(s) used. Each percentage reported above is a visual estimation of total composition, unless otherwise noted in this report. Asbestos detection limit is less than 1 percent. Test measurements are traceable to Standard Reference Material 1866a and 1867. The results are valid only for the materials tested. The information listed above is for the exclusive use of the client listed above. Sample results shall not be reproduced in any form or fashion for advertising or other purposes in connection with EEG's name or signature without consent from EEG. Sample results shall not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples not consumed in analysis will be retained for a maximum of 30 days. Samples may be returned to the client upon request. Accredited by the National Voluntary Laboratory Accreditation Program for the specific scope of Accreditation under NVLAP code 101587-0.



Respectfully Submitted,
 EEG, Inc

 Analyst

 NVLAP Signatory

Asbestos Background Information

ASBESTOS

Background Information

The Asbestos Issue

Asbestos fibers can cause serious health problems. If inhaled, they can cause diseases that disrupt the normal functioning of the lungs. Three specific diseases-asbestosis (a fibrous scarring of the lungs), lung cancer, and mesothelioma (a cancer of the lining of the chest or abdominal cavity) have been linked to asbestos exposure. These diseases do not develop immediately after inhalation of asbestos fibers; it may be 20 years or more before symptoms appear.

In general, as with cigarette smoking and the inhalation of tobacco smoke, the more asbestos fibers a person inhales, the greater the risk of developing an asbestos-related disease. Most of the cases of severe health problems resulting from asbestos exposure have been experienced by workers who held jobs in industries such as shipbuilding, mining, milling, and fabricating, where they were exposed to very high levels of asbestos in the air, without benefit of the worker protections now afforded by law. Many of these same workers were also smokers. These employees worked directly with asbestos materials on a regular basis and, generally, for long periods of time as part of their jobs. Additionally, there is an increasing concern for the health and safety of construction, renovation, and building maintenance personnel, because of possible periodic exposure to elevated levels of asbestos fibers while performing their jobs.

Whenever we discuss the risk posed by asbestos, we must keep in mind that asbestos fibers can be found nearly everywhere in our environment (usually at very low levels). There is, at this time, insufficient information concerning health effects resulting from low-level asbestos exposure, either from exposures in buildings or from our environment. This makes it difficult to accurately assess the magnitude of cancer risk for building occupants, tenants, and building maintenance and custodial workers. Although in general the risk is likely to be negligible for occupants, health concerns remain, particularly for the building's custodial and maintenance workers. Their jobs are likely to bring them into close proximity to ACM, and may sometimes require them to disturb the ACM in the performance of maintenance activities. For these workers in particular, a complete and effective O&M program can greatly reduce asbestos exposure. This kind of O&M program can also minimize asbestos exposures for other building occupants as well.

What is Asbestos?

The term "asbestos" describes six naturally occurring fibrous minerals found in certain types of rock formations. Of that general group, the minerals chrysotile, amosite, and crocidolite have been most commonly used in building products. When mined and processed, asbestos is typically separated into very thin fibers. When these fibers are present in the air, they are normally invisible to the naked eye. Asbestos fibers are commonly mixed during processing with a material that binds them together so that they can be used in many different products. Because these fibers are so small and light, they may remain in the air for many hours if they are released from ACM in a building. When fibers are released into the air, people in the building may inhale them.

Asbestos became a popular commercial product because it is strong, won't burn, resists corrosion, and insulates well. In the United States, its commercial use began in the early 1900s and peaked in the period from World War II into the 1970s. Under the Clean Air Act of 1970 the EPA has been regulating many asbestos-containing materials, which by EPA definition, are materials with more than one percent asbestos. The Occupational Safety and Health Administration (OSHA) asbestos construction standard in Section K, "Communication of hazards to employees," specifies labeling many materials containing asbestos. In the mid-1970s several major kinds of asbestos materials, such as spray-applied insulation, fireproofing, and acoustical surfacing material, were banned by EPA because of growing concern about health effects, particularly cancer, associated with exposures to such materials.

Where is Asbestos Likely to be Found in Buildings?

In February 1988, the EPA released a report titled *EPA Study of Asbestos-Containing Materials in Public Buildings: A Report to Congress*. EPA found that "friable" (easily crumbled) ACM can be found in an estimated 700,000 public and commercial buildings. About 500,000 of those buildings are believed to contain at least some damaged asbestos, and some areas of significantly damaged ACM can be found in over half of them.

According to the EPA study, significantly damaged ACM is found primarily in building areas not generally accessible to the public, such as boiler and machinery rooms where asbestos exposures generally would be limited to service and maintenance workers. Friable ACM, if present in air plenums, can lead to distribution of the material throughout the building, thereby possibly exposing building occupants. ACM can also be found in other building locations.

Asbestos in buildings has been commonly used for thermal insulation, fireproofing, and in various building materials, such as floor coverings and ceiling tile, cement pipe and sheeting, granular and corrugated paper pipe wrap, and acoustical and decorative treatment for ceilings and walls. Typically, it is found in pipe and boiler insulation and in spray-applied uses such as fireproofing or sound-deadening applications.

The amount of asbestos in these products varies widely (from approximately 1 percent to nearly 100 percent). The precise amount of asbestos in a product cannot always be accurately determined from labels or by asking the manufacturer. Nor can positive identification of asbestos be ascertained merely by visual examination. Instead, a qualified laboratory must analyze representative samples of the suspect material.

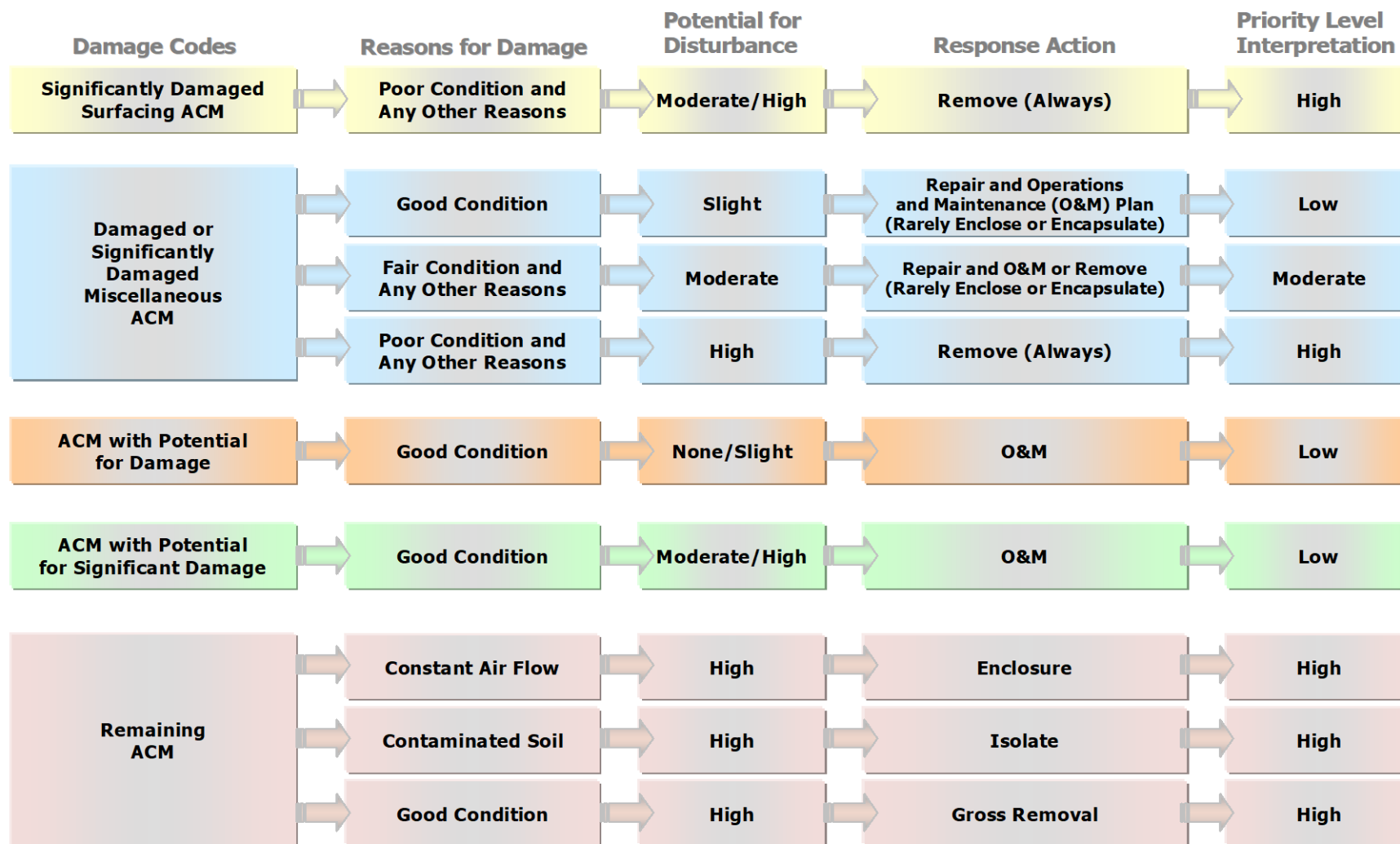
When is Asbestos a Problem?

Intact and undisturbed asbestos materials do not pose a health risk. The mere presence of asbestos in a building does not mean that the health of building occupants is endangered. ACM that is in good condition, and is not somehow damaged or disturbed, is not likely to release asbestos fibers into the air. When ACM is properly managed, release of asbestos fibers into the air is prevented or minimized, and the risk of asbestos-related disease can be reduced to a negligible level. However, asbestos materials can become hazardous when, due to damage, disturbance, or deterioration over time, they release fibers into building air. Under these conditions, when ACM is damaged or disturbed—for example, by maintenance repairs conducted without proper controls, elevated airborne asbestos concentrations can create a potential hazard for workers and other building occupants.

Decision Logic Flow Chart for Hazard Assessments

DECISION LOGIC FLOWCHART

for Hazard Assessments



Laboratory QA/QC Procedures for Bulk Analysis

LABORATORY QA/QC PROCEDURES

for Bulk Analysis

Quality Control Checks

Quality control checks are performed on a routine basis to verify the analysis and ensure the quality of the data. The Bulk Quality Control Program represents at least ten percent of all samples analyzed.

Quality control checks include the following:

METHOD 1	Repeat analysis of the same sample preparation by a different analyst.
METHOD 2	Re-preparation of the same sample and reanalysis by the same analyst.
METHOD 3	Re-preparation of the same sample and reanalysis by a different analyst.

Selection of Samples for Reanalysis

There are several ways to select samples for Quality Control reanalysis. The following is a list of resample procedures:

1. Samples received by the client in amounts less than 25 samples or small projects are reserved for a blind reanalysis. Ten percent of these samples are reanalyzed. This reanalysis may include sample Method 2 or 3 depending on who did the original analysis and who is doing the Quality Control Analysis. These samples are selected by the Laboratory Manager or Analyst in a semi-random fashion by selecting every tenth sample in the batch to be reanalyzed.
2. Special projects of samples in amounts greater than 25 samples will be analyzed by repeat analysis (Method 1) and/or reanalysis of the same sample by re-preparation (Method 2).
 - a. Repeat analysis of the same sample preparation by a different analyst (Method 1) is conducted at the completion of the analysis of the set. Reanalysis of these samples is selected by choosing every tenth slide (which is labeled by a sample number) or choosing a sample that is suspected of containing asbestos but no asbestos was detected. This quality control check is recorded on the original bulk analysis form by dating and initialing the original form in the proper location.

This procedure encourages interaction between analyst; and any discrepancies are resolved immediately. A copy of the bulk analysis form in which the control check was made is filed in the Quality Control book in the lab.

- b. Re-preparation and reanalysis by the same analyst (Method 2). Samples are selected by the original analyst after the analysis is completed from a sample group or project. The original analyst does not have the results of the original analysis. Samples may be selected by choosing every tenth sample in that group or project. The results are reported on a separate bulk analysis form and compared to the original analysis by the Laboratory Manager and tabulated on the QA Sample Analysis log. Any discrepancies are noted and resolved.

Samples that are in the one percent range or samples that are in question by the original analyst are reanalyzed by a second analyst without the knowledge of the first results (Method 3) or by the original analyst (Method 2). The second results are compared to the original results and any discrepancies are resolved.

This Quality Control check is noted on the original bulk analysis form. This method is conducted at the request of the original analyst. If the two analyses are still not completely resolved, the sample is sent to another lab for

comparison or sent to the McCrone Research Institute for additional instruction and identification.

Traceable Standards

1. NIST traceable standards are analyzed during the NVLAP testing rounds. Each analyst individually analyzes the samples. Results of the sample analysis is tabulated on the Monthly QA Bulk Summary Sheet and filed in the laboratory QA files.
2. NIST Standard Reference Material
1866 and 1867A are available in the laboratory as a calibration and training tool.
3. Generated Standard
Generated Standards are analyzed periodically by each analyst as a means to calibrate the analysts. These standards are preparations of material with known volume/weight relationship.

Recording QC Results

The Quality Control results are tabulated and reviewed by the Laboratory Manager and filed in the laboratory files and analyst files. Discrepancies are noted and corrective measures are taken as soon as possible. Any corrective measures that are taken are placed in the lab files and analyst files.

Discrepancies found in the ten percent reanalysis which involve false negatives or false positive will be corrected, and any similar sample in the sample group or project will also be reanalyzed as part of the Quality Control.

If any corrections are needed for the clients report, they shall be made immediately. If the report has been sent to the client, a phone call shall be made pertaining to the change and a corrected report shall be sent to replace the original. All analytical correction or change to a report is noted on the report by the comment "Corrected Report" in the footnote section of the report.

Contamination Control

To assure a contamination free environment, the following procedures are strictly adhered to:

1. The hood is turned on before analysis begins.
 2. Only one sample is placed in the working area of the hood at a time.
 3. After each analysis, all tools and surfaces are cleaned with a damp wipe.
 4. Slides, cover slips, and mounting medium kept outside the hood are to prevent contamination of airborne fibers in the hood.
 5. After each day's analysis, the lab bench and working surfaces are cleaned with a damp wipe.
 6. Contamination is checked each month or as needed by analyzing blanks.
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Inspector Certificates

Arkansas Department of Environmental Quality

ENVIRONMENTAL ENTERPRISE GROUP (EEG), INC.

is a licensed
Asbestos Abatement Consultant

having qualified as required by law in accordance with the regulations adopted by the Arkansas Pollution Control and Ecology Commission's Regulation 21 pursuant to Arkansas Code Annotated §20-27-1001 et seq., relative to abatement of asbestos-containing material within the state of Arkansas.



License Number: 000234

Issue Date: 11/05/2020

Expire Date: 12/07/2021

Becky W. Keogh
Becky W. Keogh
ADEQ Director

Arkansas Department of Environmental Quality

ROBERT E. SMITH

*having satisfied the requirements necessary to meet the provisions of AHERA/ASHARA under TSCA Title II
and the Arkansas Pollution Control and Ecology Commission's Regulation 21 and is hereby certified in the
State of Arkansas in the discipline(s) of Asbestos*

Discipline	Issue Date	Effective Date	Expiration Date
Air Monitor	11/12/2020	12/07/2020	11/30/2021
Contractor Supervisor	11/12/2020	12/07/2020	11/30/2021
Inspector	11/11/2020	12/07/2020	11/30/2021
Management Planner	11/11/2020	12/07/2020	11/30/2021
Project Designer	11/13/2020	12/07/2020	11/30/2021



Certification Number: 011927

Becky W. Keogh
Becky W. Keogh
ADEQ Director

Arkansas Department of Environmental Quality

GREG MILLSAPS

having satisfied the requirements necessary to meet the provisions of AHERA/ASHARA under TSCA Title II and the Arkansas Pollution Control and Ecology Commission's Regulation 21 and is hereby certified in the State of Arkansas in the discipline(s) of Asbestos

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Inspector	11/11/2020	12/07/2020	11/30/2021



Certification Number: 015533

Becky W. Keogh
Becky W. Keogh
ADEQ Director