



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 15, 2013

**RE: RRI OF OHIO, INC. SCRAP TIRE
RECOVERY FACILITY
NOTICE OF VIOLATION**

Mr. Mark S. Lewis, President
RRI of Ohio, Inc.
330 Dunbar Drive
Pittsburgh, PA 15235-5403

CERTIFIED MAIL 7010 1060 0000 0089 9630

Alonzo Burney
502 5th Avenue
McKeesport, PA 15132-2501

CERTIFIED MAIL 7010 1060 0000 0089 9654

Edward L. Page
313 Babcock Trail
Youngstown, OH 44511

CERTIFIED MAIL 7010 1060 0000 0089 9661

Kenneth T. Fair
5696 E Liberty Blvd.
Pittsburgh, PA 15206-2472

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Dear Owners/Operators:

On December 17, 2012, Ohio Environmental Protection Agency (Ohio EPA) Division of Materials and Waste Management (DMWM) Northeast District Office (NEDO) inspected the RRI of Ohio, Inc., and adjacent buildings located at 1165 Brittain Street, Youngstown, Ohio (Property). RRI of Ohio, Inc. is a formerly licensed Class II Scrap Tire Recovery Facility (Facility) that was required to undergo mandatory closure upon final denial of the license, as effective November 2, 2009.

RRI of Ohio, Inc. caught on fire on several occasions in 2012. The fire consumed most of the buildings on the Property and burned a majority of the contents of the Facility. The contents of the former Facility include, roughly 14,220 passenger tire equivalents (PTEs) as observed per a NOV dated October 7, 2011. Ohio EPA conducted the December 17, 2012 inspection to determine compliance with state solid waste and scrap tire rules.

Upon completion of the inspection, Ohio EPA identified the owners/operators in violation of the following:

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 2

[a] scrap tire collection, storage, or recovery facility license held by the facility has expired, a further license has been applied for and denied, and all remedies for such denial have either been exhausted, or waived by failure to pursue such remedies in a timely manner...

OAC Rule 3745-27-66(C) states that *"[n]ot later than thirty days after a scrap tire collection, storage, or recovery facility has ceased to accept scrap tires, the facility owner shall do the following:*

(a) Remove all scrap tires to one or more of the following: (i) A scrap tire recovery facility licensed under Chapter 3745-37 of the Administrative Code. (ii) A scrap tire monocell or monofill facility licensed under Chapter 3745-37 of the Administrative Code. (iii) A scrap tire collection or storage facility licensed under Chapter 3745-37 of the Administrative Code. (iv) A solid waste incineration or energy recovery facility subject to regulation under Chapter 3745-27 of the Administrative Code. (v) A premises located in this state where scrap tires shall be beneficially used in accordance with rule 3745-27-78 of the Administrative Code. (vi) A facility authorized to accept scrap tires, or a premises that shall beneficially use the scrap tires, that is located in another state and is operating in accordance with the laws of that state. (vii) A transporter holding a valid annual registration certificate under rule 3745-27-54 of the Administrative Code.

(b) Remove any solid waste remaining on site and dispose of them at an facility authorized to dispose of such waste.

(c) Clean all areas of the facility and any appurtenances, including, but not limited to, containers, equipment, machines, storage tanks, floors, and facility surfaces that were in contact with scrap tires, solid waste, or processed materials at any time during the operation of the facility and that are not to be removed during the closure. The above shall be washed or otherwise subjected to procedures that substantially reduce or eliminate any remaining constituents or contaminants derived from contact with scrap tires, solid waste, or processed materials.

(d) Submit the final annual report for the facility, as required by paragraph (J)(3) of rule 3745-27-65 of the Administrative Code, to the director."

The owners/operators are in violation of these rules due to the owners/operators failure to close the facility within 30 days upon final denial of the license, as effective November 2, 2009 to operate a scrap tire recovery facility. Therefore, the owners/operators are responsible for removal and proper disposal of all whole and

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 3

partially burnt scrap tires, clean all areas and appurtenances, and submittal of a final annual report for the facility.

Furthermore, based on the attached analytical results, Ohio EPA determined that the contents, including all the scrap tires, within the structure are "regulated asbestos containing material" (RACM) and are subject to Ohio Administrative Code (OAC) 3745-20-01(B)(42)(d). As RACM, the building contents must be removed, loaded, transported, and properly disposed in accordance with applicable state and federal air regulations. Pursuant to 40 CFR 61 Subpart M an individual trained in the provisions of national emissions standards for hazardous air pollutants (NESHAPs) must be on-site during loading and transportation operations.

2. **Ohio Revised Code (ORC) Section 3734.03** states, in part, *"No person shall dispose of solid wastes by open burning or open dumping. . . ."*

OAC Rule 3745-27-05(C) states, in part, *"No person shall conduct, permit, or allow open dumping. In the event that open dumping is occurring or has occurred at a property, the person(s) responsible for the open dumping, the owner of the property, or the person(s) who allow or allowed open dumping to occur, shall promptly remove and dispose or otherwise manage the solid waste in accordance with Chapter 3734. of the Revised Code, and shall submit verification that the solid waste has been properly managed."*

The owners/operators are responsible for cleanup and appropriate disposal of the whole and partially burnt scrap tires. Furthermore, as RACM, the building contents must be removed, loaded, transported, and properly disposed in accordance with applicable state and federal air regulations. Pursuant to 40 CFR 61 Subpart M an individual trained in the provisions of national emissions standards for hazardous air pollutants (NESHAPs) must be on-site during loading and transportation operations.

3. **OAC 3745-27-60(C)(1)** states, in part, that *"[a]nyone storing scrap tires shall maintain mosquito control as follows: One or more of the following shall be done to control mosquitoes: (a) Remove liquids from scrap tires within twenty-four hours of accepting the scrap tires; (b) Store scrap tires such that water does not accumulate in scrap tires or containers. Tires shall be kept free of water at all times; (c) Within twenty-four hours of accepting scrap tires containing liquid, arrange for the application of a pesticide or larvicide, which is registered for use as mosquito control by the Ohio Department of Agriculture."*

OAC 3745-27-60(C)(2) states: *"Maintain mosquito control by keeping all tires dry or by continuing applications of a pesticide or larvicide to all scrap tires stored outdoors at*

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 4

no greater than thirty-day intervals or as recommended by the manufacturer or formulator.

The owners/operators are in violation of the above cited scrap tire rules. During the inspection, Ohio EPA observed whole and partial scrap tires within the former Facility. Scrap tires that can hold water that could potentially breed mosquitoes and the presence of mosquitoes constitutes a nuisance and a hazard to public health and safety. Currently the former Facility is a burned-out shell and completely open to the environment. The owners/operators must either keep the tires dry or maintain mosquito control until the scrap tires have been removed and properly disposed at an appropriate licensed scrap tire facility.

As a result of the fire, the owners/operators are also responsible to comply with all aspects of OAC 3745-27-79.

OAC 3745-27-79 states “[s]oil, surface water, and ground water contamination characterization and remediation caused by open burning of scrap tires, applies to “any site or facility where the open burning of scrap tires has occurred including, but not limited to, all licensed scrap tire facilities...and all other sites where scrap tires are managed, collected, stored, recovered, disposed...and to any associated areas affected by the scrap tire fire, including soil, surface water, and ground water.”

OAC Rule 3745-27-79(A)(2) states “[t]his rule is applicable to the ‘responsible individual’ which includes, but is not limited to the owner, operator, registrant, permittee, licensee, and/or person who conducted or allowed the accumulation or open burning of scrap tires.”

Therefore, the owners/operators are also in violation of the following:

4. **OAC Rule 3745-27-79(B)(1)** states, in part, “the responsible individual shall characterize and, if necessary, remediate areas of contamination resulting from the open burning of scrap tires...(a) after the occurrence of a fire at a site or facility” and “(b) after the open burning of scrap tires at any site or facility...”

OAC Rule 3745-27-79(B)(2) states, in part, “... any work performed by the responsible individual to characterize and/or remediate contamination shall accurately and completely characterize the rate, source, and extent of contamination, and to remediate the contamination in a manner that is protective of human health and the environment and, to the extent technically and economically feasible, provides for the restoration of the contaminated site or facility to its pre-existing condition.”

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 5

The owners/operators are in violation of these rules for failure to characterize and remediate contamination of the Property after a tire fire. To date, the owners/operators have not begun any work to characterize or remediate the former Facility or the Property as a result of the open burning of scrap tires in violation of OAC Rule 3745-27-79(B)(1) and (2). Furthermore, as RACM, the building contents must be removed, loaded, transported, and properly disposed in accordance with applicable state and federal air regulations. Pursuant to 40 CFR 61 Subpart M an individual trained in the provisions of national emissions standards for hazardous air pollutants (NESHAPs) must be on-site during loading and transportation operations.

5. **OAC Rule 3745-27-79(B)(3)(a) through (3)(e)** states that *“whenever there is a fire at a site or facility, the responsible individual shall immediately...notify local police and fire agencies ... notify the Ohio EPA emergency response team using their twenty-four hour toll free number ... take all reasonable actions necessary to suppress the fire and to protect human health and safety of the environment ... take all reasonable measures necessary to contain any residuals including but not limited to pyrolytic oil and water that result from suppressing a fire at the site or facility. These measures shall include establishing berms, dikes or other containment devices where necessary, and ...take all reasonable measures necessary to ensure that fires do not occur, recur, or spread to other areas of the site of facility. The measures shall include removing or isolating tires and/or portable containers.”*

The owners/operators failed to inform the local police and fire agencies, notify the Ohio EPA emergency response, take all reasonable measures to suppress the fire, and take all measures to ensure that fires do not occur, recur, or spread to other areas beyond the former Facility.

6. **OAC Rule 3745-27-79(C)(1)(a)** states that after the occurrence of a fire at a site or facility, the responsible individual shall complete the following: *“Priority 1: within seven days of the occurrence of a fire at a site or facility, notify, in writing, the Ohio EPA district office in which the site or facility is located, the local solid waste management district, the Ohio EPA central office, and the local health department. The responsible individual shall include in the notification the name and telephone number of the contact person reporting the fire; the address or location of the scrap tire fire; the date and duration of the fire; and the quantity of tires involved, to the extent known.”*

The owners/operators failed to complete the “Priority 1” actions specified in the rule within seven days of the occurrence of the fire at the Facility. In addition, as of the date of this letter, you have not completed the “Priority 1” actions specified in the rule in violation of OAC Rule 3745-27-79(C)(1)(a). OAC Rule 3745-27-79(C)(1)(b) through (e) prioritizes remediation of scrap tire fire sites, from the removal of whole and

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 6

partially burned tires to the containerization, characterization, and removal of fire residuals.

7. **OAC Rule 3745-27-79(C)(1)(b)** states that after the occurrence of a fire at a site or facility, the owners/operators must complete the following: *“Priority 2: Remove all whole and partially burned tires as soon as possible to reduce the possibility of additional fires. Partially burnt tires shall be disposed of as solid waste. Whole tires with melted or charred surfaces and partially burnt tires shall not be used in civil engineering projects or disposed of in a scrap tire monofill or monocell...”*

The owners/operators failed to complete the “Priority 2” actions specified in the rule after the occurrence of the fire at the Facility. As of the date of this letter, you have not completed the “Priority 2” actions specified in the rule. Furthermore, as RACM, the building contents must be removed, loaded, transported, and properly disposed in accordance with applicable state and federal air regulations. Pursuant to 40 CFR 61 Subpart M an individual trained in the provisions of national emissions standards for hazardous air pollutants (NESHAPs) must be on-site during loading and transportation operations.

8. **OAC Rule 3745-27-79(C)(2)(b)** states that removal actions shall be *“begun within forty-five days at any site or facility where more than ten thousand PTEs are involved in a fire.”* Pursuant to OAC Rule 3745-27-79(D), a *characterization and remediation plan* shall be submitted to Ohio EPA within forty-five days after the start of any scrap tire fire involving more than ten thousand PTEs.

The owners/operator failed to initiate removal actions within forty-five days of the scrap tire fire. The owners/operators are responsible for initiating removal actions as soon as possible. As previously discussed, the building contents must be removed, loaded, transported, and properly disposed in accordance with applicable state and federal air regulations.

9. **OAC Rule 3745-27-79(F)** states that *surface water* contamination or degradation of surface waters of the state shall be characterized and remediated as specified in this paragraph, unless prior written concurrence is obtained from or unless other or different requirements are specified by the director, the approved board of health, or a court of law.

The owners/operator failed to characterize and remediate all surface water that has been in contact with the partially burnt scrap tires and remaining residual. The owners/operators are responsible for initiating surface water remediation as soon as possible.

Mr. Mark S. Lewis, President, RRI of Ohio, Inc.
Alonzo Burney
Edward L. Page
Kenneth T. Fair
January 15, 2013
Page 7

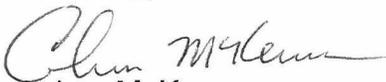
Within 14 days of receipt of this letter, the owners/operators need to provide documentation to this office that includes the steps taken to comply with OAC Rule 3745-27-79(H) and in response to the violations cited above. Documentation of steps taken to comply with the rules and in response to the violations includes, but is not limited to, written correspondence, updated policies, plans, and photographs supporting remediation activities, as appropriate, and may be submitted via the postal service or electronically to colum.mckenna@epa.state.oh.us.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, the owners/operators are requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator, or others, from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Resource Conservation and Recovery Act, or Comprehensive Environmental Response, Compensation, and Liability Act for remedying conditions resulting from any release of contaminants to the environment.

If you have any questions, please contact me by telephone at (330) 963-1268, or by e-mail at colum.mckenna@epa.state.oh.us.

Sincerely,



Colum McKenna
Environmental Specialist
Division of Materials and Waste Management

ec: Chris Williams, DAPC-NEDO
Bob Princic, DAPC-NEDO

Melinda Berry, DMWM-CO
Connie Livchak, DMWM-CO

cc: Anthony Farris, City of Youngstown Law Director
Bob Eubanks, AGO
Lieutenant Sharyl Frasier, City of Youngstown Fire Department
Brenda Williams, City of Youngstown Building Department.
Deputy W. Walker, Mahoning County Sheriff's Department
File: [Singh/TIRE/RRI of Ohio/COR/50] DMWM #4121



EA GROUP

Environmental Analysis
and Management

Ohio EPA NEDO-DERR-DAPC
2110 E. Aurora Rd.
Twinsburg, OH 44087
Christopher Williams

Client Project RRI

EA Group Workorder Number: 120900026

Received on September 5, 2012

The following analytical report contains results as requested for samples submitted to EA Group. The results included in this report have been reviewed for compliance with the analytical methods indicated in this report. All data has been found to be compliant with accepted laboratory protocol, except as noted in the QC narrative. Industrial hygiene reports, air and/or surface concentrations results are based upon sampling information provided by the client. Industrial hygiene results will not be blank corrected. Analyst initials of REF indicate analysis performed at a subcontract facility.

If you have questions, comments or require further assistance regarding this report, please contact your client services representative or one of the individuals listed below.

Data or reporting:

Jeff Herbert - Lab Manager
jherbert@eagroupohio.com

Debbie Lauer - QA Manager
dlauer@eagroupohio.com

Sample tracking, supplies:

Lisa Foose - Sample Control
sreceiving@eagroupohio.com

Mike Herbert - Supervisor
mherbert@eagroupohio.com

Invoice Related:

Bonnie Renbarger - Office Manager
brenbarger@eagroupohio.com

Reproduction of this report is prohibited except in its entirety. Unless noted, soil, sludge and sediment results are reported on dry weight basis. The "Sample Reporting Limit" is based on the method used for analysis and does not refer to any regulatory limit. These results relate only to the items tested.



EA GROUP

Environmental Analysis
and Management

Laboratory Analytical Report

Ohio EPA NEDO-DERR-DAPC

2110 E. Aurora Rd.

Twinsburg, OH 44087

Attention:
Christopher Williams

Project Identification

RRI

Purchase Order:

EA Group

Order Number

1209-00026

Carl R. Eggebraaten
Microscopist

Jeffrey A. Herbert
Laboratory Manager

September 12, 2012



EA GROUP

Environmental Analysis
and Management

Project Summary

The following analytical report contains the results as requested for samples submitted to EA Group. The results included in this report have been reviewed for compliance with the analytical methods indicated in this report. All data have been found to be compliant with accepted laboratory protocol. Exceptions, if any, are noted below. Quantification is accurate to within +/- 10%.

Sample Summary

Sample Receive Date: 9/ 5/2012

EAG	Client	EAG	Client
<u>Sample Identification</u>	<u>Sample Identification</u>	<u>Sample Identification</u>	<u>Sample Identification</u>
120900026-01A	NE-311	120900026-02A	NE-312
120900026-03A	NE-313	120900026-03B	NE-313
120900026-04A	NE-314	120900026-05A	NE-315
120900026-06A	NE-316	120900026-06B	NE-316
120900026-07A	NE-317	120900026-08A	NE-318
120900026-08B	NE-318	120900026-09A	NE-319
120900026-10A	NE-320	120900026-11A	NE-321
120900026-11B	NE-321		

Quality Control Narrative

Reproduction of this report is prohibited except in its entirety. Unless noted, soil, sludge, and sediment results are reported on dry weight basis. The "Sample Reporting Limit" is based on the method used for analysis and does not refer to any regulatory limit.



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Environmental Analysis
and Management

Workorder: 1209-00026

Page: 1

LAG ID: 1209-00026-01A

Client ID: NE-311

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	15	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Fibrous Glass	ND	
% Other Non-Asbestos Fibers	ND	
% Gravimetrically Reduced	54	
% Other Non-Asbestos Mat'ls	31	
Analysis Comments	NA	

Sample Physical Description: Black bituminous material

LAG ID: 1209-00026-02A

Client ID: NE-312

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	ND	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	ND	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	100	
Analysis Comments	NA	

Sample Physical Description: Black material

LAG ID: 1209-00026-03A

Client ID: NE-313

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	Trace	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Fibrous Glass	1	
% Other Non-Asbestos Fibers	ND	
% Gravimetrically Reduced	75	
% Other Non-Asbestos Mat'ls	24	
Analysis Comments	*	see note on last page

Sample Physical Description: Black bituminous material



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Environmental Analysis
and Management

Workorder: 1209-00026

Page: 2

EAG ID: 1209-00026-03B	Client ID: NE-313	Matrix: Bulk	
Date Sampled: 09/04/2012	Date Received: 09/05/2012	Date Analyzed: 09/11/2012	Analyst: CRE
<u>Parameter</u>		<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis			
% Chrysotile Asbestos		ND	
% Amosite Asbestos		ND	
% Crocidolite Asbestos		ND	
% Other Asbestos Fibers		ND	
% Cellulose		ND	
% Fibrous Glass		ND	
% Other Non-Asbestos Fibers		ND	
% Other Non-Asbestos Mat'ls		100	
Analysis Comments		NA	
Sample Physical Description:	Gray cementitious material		

EAG ID: 1209-00026-04A	Client ID: NE-314	Matrix: Bulk	
Date Sampled: 09/04/2012	Date Received: 09/05/2012	Date Analyzed: 09/11/2012	Analyst: CRE
<u>Parameter</u>		<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis			
% Chrysotile Asbestos		ND	
% Amosite Asbestos		ND	
% Crocidolite Asbestos		ND	
% Other Asbestos Fibers		ND	
% Fibrous Glass		Trace	
% Other Non-Asbestos Fibers		ND	
% Gravimetrically Reduced		62	
% Other Non-Asbestos Mat'ls		38	
Analysis Comments		NA	
Sample Physical Description:	Black bituminous material		

EAG ID: 1209-00026-05A	Client ID: NE-315	Matrix: Bulk	
Date Sampled: 09/04/2012	Date Received: 09/05/2012	Date Analyzed: 09/11/2012	Analyst: CRE
<u>Parameter</u>		<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis			
% Chrysotile Asbestos		ND	
% Amosite Asbestos		ND	
% Crocidolite Asbestos		ND	
% Other Asbestos Fibers		ND	
% Cellulose		ND	
% Fibrous Glass		3	
% Other Non-Asbestos Fibers		ND	
% Other Non-Asbestos Mat'ls		97	
Analysis Comments		NA	
Sample Physical Description:	White material		



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Environmental Analysis
and Management

Workorder: 1209-00026

Page: 3

EAG ID: 1209-00026-06A

Client ID: NE-316

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	65	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	ND	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	35	
Analysis Comments	NA	
Sample Physical Description:	Brown paper-type material	

EAG ID: 1209-00026-06B

Client ID: NE-316

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	ND	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	3	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	97	
Analysis Comments	NA	
Sample Physical Description:	White material	

EAG ID: 1209-00026-07A

Client ID: NE-317

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	ND	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	ND	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	100	
Analysis Comments	NA	
Sample Physical Description:	White material	



EA GROUP

Environmental Analysis
and Management

Workorder: 1209-00026

Page: 4

EAG ID: 1209-00026-08A

Client ID: NE-318

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	70	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	ND	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	30	
Analysis Comments	NA	

Sample Physical Description: Gray fibrous paper-type material

EAG ID: 1209-00026-08B

Client ID: NE-318

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	ND	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	85	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	15	
Analysis Comments	NA	

Sample Physical Description: Brown fibrous glass

EAG ID: 1209-00026-09A

Client ID: NE-319

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

<u>Parameter</u>	<u>Result</u>	<u>Description</u>
Bulk Asbestos Analysis		
% Chrysotile Asbestos	ND	
% Amosite Asbestos	ND	
% Crocidolite Asbestos	ND	
% Other Asbestos Fibers	ND	
% Cellulose	ND	
% Fibrous Glass	20	
% Other Non-Asbestos Fibers	ND	
% Other Non-Asbestos Mat'ls	80	
Analysis Comments	NA	

Sample Physical Description: White fibrous material



EA GROUP

Environmental Analysis
and Management

Workorder: 1209-00026

Page: 5

EAG ID: 1209-00026-10A

Client ID: NE-320

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

Parameter

Result

Description

Bulk Asbestos Analysis

% Chrysotile Asbestos

ND

% Amosite Asbestos

ND

% Crocidolite Asbestos

ND

% Other Asbestos Fibers

ND

% Fibrous Glass

ND

% Other Non-Asbestos Fibers

Trace

synthetic

% Gravimetrically Reduced

94

% Other Non-Asbestos Mat'ls

6

Analysis Comments

NA

Sample Physical Description: Black bituminous material

EAG ID: 1209-00026-11A

Client ID: NE-321

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

Parameter

Result

Description

Bulk Asbestos Analysis

% Chrysotile Asbestos

10

% Amosite Asbestos

ND

% Crocidolite Asbestos

ND

% Other Asbestos Fibers

ND

% Fibrous Glass

ND

% Other Non-Asbestos Fibers

ND

% Gravimetrically Reduced

22

% Other Non-Asbestos Mat'ls

68

Analysis Comments

NA

Sample Physical Description: Red tile

EAG ID: 1209-00026-11B

Client ID: NE-321

Matrix: Bulk

Date Sampled: 09/04/2012

Date Received: 09/05/2012

Date Analyzed: 09/11/2012

Analyst: CRE

Parameter

Result

Description

Bulk Asbestos Analysis

% Chrysotile Asbestos

ND

% Amosite Asbestos

ND

% Crocidolite Asbestos

ND

% Other Asbestos Fibers

ND

% Fibrous Glass

Trace

% Other Non-Asbestos Fibers

ND

% Gravimetrically Reduced

81

% Other Non-Asbestos Mat'ls

19

Analysis Comments

NA

Sample Physical Description: Black mastic



EA GROUP

Environmental Analysis
and Management

Workorder: 120900026

These bulk samples were analyzed as received for percentage composition of Asbestos and Non-Asbestos materials by Method(s) EPA-600/M4-82-020, December 1982 and/or EPA/600/R 93/116 July 1993, which have Detection Limits of less than 1% Asbestos.

Asbestos Containing Materials (ACM) and Presumed Asbestos Containing Materials (PACM) are regulated by several different governmental regulatory agencies.

EPA NESHAP regulations cover certain buildings that are to be renovated or demolished. NESHAP regulations require that when a sample (or layer of a multi-layered sample) is analyzed and found to contain asbestos at a concentration of less than 10% by a method other than point counting by Polarized Light Microscopy (PLM), the owner/operator has the option of:

- 1) Assuming the amount to be greater than 1% and treating the material as regulated ACM.
- OR
- 2) Requesting verification of the amount by point counting.

Building owners/operators covered by NESHAP should review the following for the full and specific regulations:

- 1) Federal Register, Vol. 55, No. 224, Tuesday, November 20, 1990
- 2) Clarification of NESHAP requirement to perform point counting, May 8, 1991
- 3) Federal Register, Vol. 59, No. 3, Wednesday, January 5, 1994
- 4) Federal Register, Vol. 59, No. 146, Monday, August 1, 1994
- 5) Federal Register, Vol. 60, No. 243, Tuesday, December 19, 1995

Building owners/operators and employers covered by OSHA regulations also have specific requirements regarding ACM and PACM. Those who may be covered by these regulations should review 29 CFR 1910.1001 and 29 CFR 1926.1101 for specific requirements.

FLOOR TILES: PLM should only be considered a screening method for floor tile analysis. Any floor tile with a result of one percent or less asbestos by PLM should be assumed positive for asbestos until the sample is re-analyzed by Analytical Electron Microscopy.

Other difficult matrices (such as bituminous, organically bound, and cementitious materials) may obscure very small asbestos fibers. Some samples may also contain asbestos fibers with diameters below the limit of resolution of the optical microscopes used in typical PLM analysis. Therefore, negative results by PLM on these materials should be confirmed by Analytical Electron Microscopy.

EA Group has a sample retention policy of sixty (60) days. After that time, the samples will be disposed of unless the client has requested that they be returned. The client will be charged a shipping and handling fee associated with returned samples only.

Key to analysis comments (if noted on samples):

- * Asbestos content in this sample has been verified by the Chalkley point counting procedure.
- ** The client has the option of requesting verification of this analytical result by point counting as specified by the NESHAP standards.
- *** Insufficient sample amount for quantitation and/or performing Quality Control functions.
- **** Due to the nature of the sample (dust, debris, or vacuum), percentages for the constituents could not be assigned.
- After gravimetric reduction, the residue has been visually estimated as at least 10% asbestos. Therefore, point counting is not required to satisfy NESHAP requirements.
- + Contains fibers that may be an asbestos mineral but could not be positively identified by PLM. Analysis by Transmission Electron Microscopy (TEM) is recommended.
- ++ See additional comment on conclusions page.

ND	None Detected
Trace	Observed but less than 1%
IH	Non-Homogeneous sample, the result reflects the average.
Ind. non-ash	Undetermined non-asbestos fibers

This report applies only to sample(s) analyzed and may not be used by the client to claim product certification, approval, or endorsement by NVLAP or any agency of the U.S. Government.

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Company Name OEPA

Report Address 2110 E. Aurora Rd

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City Twinsburg State OH Zip 44087

Phone 330 963 1223 Fax 330 487 0769

Report Attention Christopher Williams

Project Name RRT

P.O. #

TURNAROUND (✓)

RUSH

NORMAL

LABORATORY PROCEDURE		FULL ANALYSIS: ASBESTOS / NON-ASBESTOS	POINT COUNT APPROVED
ASBESTOS COMPOSITE	ASBESTOS LAYERED		

SAMPLE IDENTIFICATION	MATRIX	COLLECTION DATE	ASBESTOS COMPOSITE	ASBESTOS LAYERED	POINT COUNT APPROVED
NE 311 Roofing Materials		9/4/12	X	X	X
NE 312 Roofing Materials (Birds/Loose)			X	X	X
NE 313 Roof Systems			X	X	X
NE 314 Roof System			X	X	X
NE 315 Plaster Sample			X	X	X
NE 316 Insulation			X	X	X
NE 317 Suspect Mag Block			X	X	X
NE 318 Pipe Wrap			X	X	X
NE 319 White Fibrous Material			X	X	X
NE 320 Roofing System			X	X	X

Point Count any Sample < 10%

ANALYSIS WILL BE PERFORMED IN ACCORDANCE WITH EA GROUP STANDARD TERMS AND CONDITIONS

Fax Results Email Results (pdf) Christopher Williams @ cpa state oh us

Method of Shipment: EAG Client Fed Ex UPS Other Hand Delive

Explanation of Laboratory Procedures:

EA Group employs EPA Method 800/R-93/116 in the analysis of bulk materials for asbestos content by polarized light microscopy (PLM).

Composite Analysis – Sample will be composited and a single result will be reported for asbestos content. Point Count is NOT applicable to this analysis.

Layered Analysis – Individual layers will be analyzed separately. The report will not include non-asbestos components.

Full Analysis – Individual layers will be analyzed separately. The report will include asbestos and non-asbestos components.

Point Count – The point count procedure is typically used to quantify asbestos in samples previously quantified by the Visual Estimation Method. A separate charge applies for each sample that is point counted. This method is NOT applicable to Composite Analysis.

Relinquished by (sign) <u>[Signature]</u>	Date/Time <u>9/4/12 2:45 pm</u>	Received by (sign) <u>[Signature]</u>	Date/Time <u>9/4/2012 2:45 pm</u>
Relinquished by (sign) <u>[Signature]</u>	Date/Time <u>9/5/2012 2:30 pm</u>	Received by (sign) <u>[Signature]</u>	Date/Time <u>9.5.12 1430</u>
Relinquished by (sign)	Date/Time	Received by (sign)	Date/Time