AYLOR PROPERTY
13981 QUEBEC STREET, THORNTON, COLORADO

ABATEMENT, DEMOLOTION, AND REMOVAL

PROJECT CIP 22-109A

REQUEST FOR PROPOSALS

Date Issued: TBD

Mandatory Site Walk: TBD

Questions Due: TBD

Bids Due: TBD

Anticipated Award: TBD

Issued by:

ERO Resources Corporation

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Lakewood, CO 80401

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REQUEST FOR PROPOSALS

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ABATEMENT, DEMOLITION, AND REMOVAL

1. Introduction

1.1. Overview

This Request for Proposals ("RFP") is being issued by ERO Resources Corporation (ERO) in its capacity as environmental consultant for the City of Thornton ("Owner"). The purpose of this RFP is to solicit proposals from City of Thornton pre-qualified Contractors for the work described herein.

The work consists of the pre-demolition abatement of identified asbestos-containing building materials (ACBM), demolition, and removal of historical farm structures located on the Aylor Property at 13981 Quebec Street, Thornton, Colorado. All work described herein is to conform to the specifications described herein and/or the City of Thornton Standards & Specifications as applicable, available at **City of Thornton Standards and Specifications | City of Thornton**.

"Respondents" means the companies or individuals that submit proposals in response to this RFP. It is understood that the selected Respondent acting as an individual, partnership, corporation, or other legal entity is state licensed and certified and capable of providing the specified services. The Respondent will be required to obtain and maintain, at its sole cost, appropriate licenses for work within the City of Thornton.

Nothing in this RFP shall be construed to create any legal obligation on the part of ERO, Owner, or any respondents. ERO reserves the right, at its sole discretion, to amend, suspend, terminate, or reissue this RFP, in whole or in part, at any stage and forego any formalities. In no event shall ERO or Owner be liable to Respondents for any costs or damages incurred in connection with the RFP process including, but not limited to, any and all costs of preparing a response to this RFP or any other costs incurred in reliance on this RFP. All supporting documentation submitted in response to this RFP will become the property of ERO and Owner. After Award, the information within the Proposal becomes public information with the exception of information that has been clearly marked as confidential and proprietary by the proposing firm. Any information marked confidential shall comply with Colorado's Open Records Act (CORA) and other applicable statutes. Owner shall be held harmless from any claims arising from the release of confidential and proprietary information not clearly designated as such by the proposing firm or which does not comply with CORA. Respondents may withdraw their interest in the RFP, in writing, at any point in time as more information regarding the tasks associated with this RFP becomes known.

1.2. Time of Completion

The selected Respondent (and upon award "Contractor") must have secured commitments to initiate on-ground site work and accept all security control and responsibility for the site as

outlined herein upon transfer of the site to the operational control of the Contractor. Active site work shall be completed within six months of the notice to proceed.

Nothing in this RFP or subsequent contract permits or will allow compensation claims or adjustments made by Contractor in the event of theft, vandalism, unauthorized destruction, or delays in site activities due to actions caused by inadequate, inappropriate, or poor site security. Site security within the work area, and appropriate levels and implementation thereof, is at the sole discretion and responsibility of the Contractor. Owner and/or ERO reserve the right to inspect, identify, and require timely satisfactory adjustments to security deemed inadequate at no additional cost to the Owner.

1.3. Term of Contract

The contract awarded pursuant to this RFP solicitation will be directly with ERO and shall be for a period up to twelve months, with the possibility of an extension, as needed and/or warranted. A copy of the proposed contract is included in **Attachment F**. The contract will be made on the basis of a proposal for the work described herein and any issued addenda. It is the intent to award one contract to a Respondent presenting the best value for all services described in this RFP. ERO reserves the right to reject any and all Proposals, or any part thereof. ERO further reserves the right to waive any formalities, or informalities contained in any Proposal, and to award the Agreement to the most responsive, responsible, and trustworthy proposing firm as deemed in the best interest of ERO and Owner.

2. Background

The Owner owns the real property at 13981 Quebec Street in Thornton, Colorado (Adams County Parcel No. 0157120401001). The address of the project (13981 Quebec Street) refers to the historical farm and agricultural outbuildings located in the northern portion of the real property and is herein referred to as the "Aylor Property". The project area within the Aylor Property consists of the northern approximately 35-acres of undeveloped, former agricultural land with an abandoned farmhouse, several abandoned outbuildings, and ancillary structures. During due diligence activities conducted by ERO and by DS Consulting, Inc. (DS Consulting) asbestos building materials were identified within the structures as well as a Major Asbestos Spill, as defined under Colorado Department of Public Health and Environment (CDPHE), Air Quality Control Division (AQCD) Regulation No. 8, Part B, within and/or around the structures. In addition, because several of the structures are structurally unsound, a variance request for the controlled demolition of asbestos containing materials has been developed and approved by the CDPHE AQCD for the safe abatement of materials within unsounds structures.

Site location maps are shown on **Attachment A.**

Detailed scope of work for asbestos abatement is described in **Attachment B.**

Detailed scope of work for post-abatement site demolition and removal activities is described in **Attachment C.**

Additional project documents are included in **Attachment D.**

Project insurance requirements are described in **Attachment E**

Sample contract to be used between ERO and Contractor is included in **Attachment F**

Project bid forms are presented in **Attachment G**

3. Project Requirements

3.1. Scope of Work Summary

The Aylor Property consists of undeveloped agricultural land with a historical farmstead area in the northern portion that includes the following structures: a residence, well house, poultry shed, feed shed, sub-grade storage cellar, chicken coop barn, poultry barn, livestock barn, livestock lean-to, feed shed, and corrugated metal silo. The Owner desires the removal of the structures as well as general site debris cleanup and additional soil removal. In general, the work scope consist of the following:

3.1.1. Major Asbestos Spill

Abatement of major asbestos spill identified by DS Consulting, detailed within the corresponding Asbestos Spill Delineation Report prepared by DS Consulting, in accordance with CDPHE AQCD Regulation No. 8, Section III.T.

3.1.2. Sound Structures

Abatement of asbestos-containing materials identified by DS Consulting and detailed within the corresponding pre-demolition asbestos inspection reports for structures that are structurally sound in accordance with CDPHE AQCD Regulation No. 8. The applicable structures consist of the following:

a. Structure 1 – Residence (approx. 1,911 square feet (sf))
b. Structure 3 – Poultry Shed (approx. 950 sf)
c. Structure 9 – Feed shed (approx. 240 sf)
d. Structure 10 – Silo (approx. 150 sf)
e. Structure 11 – Mobile Camping Trailer (approx. 145 sf)

3.1.3. Unsound Structures

Abatement of asbestos-containing materials within structures have been determined to be structurally unsound in accordance with the December 23, 2025 Asbestos Abatement Variance Request Work Plan And Project Design for Controlled Demolition Of Asbestos Containing Materials prepared by DS Consulting and approved by the CDPHE AQCD on January 19, 2026 (Attachment D). These structures include the following:

a. Structure 4 – Storage Cellar (approx. 400 sf)
b. Structure 5 – Chicken Coop Barn (approx. 1,710 sf)
c. Structure 6 – Poultry Barn (approx. 6,160 sf)
d. Structure 7 – Livestock Barn (approx. 885 sf)

3.1.4. Demolition and Removal

Demolition and removal of all structures, foundations, and debris within the project area as shown on the attached figure in Attachment A. Two structures did not contain asbestos that require pre-demolition abatement, but are included within the demolition scope. These structures include the following:

a. Structure 2 – Well House (approx. 90 sf)

b. Structure 8 – Livestock Lean-to (approx. 1,280 sf)

3.1.5. Bid Alternate – Soil Removal

Owner currently has an estimated 3,500 cubic yards (CY) of staged soils and vegetation debris removed from various City-managed stormwater ponds that requires removal. Tasks is to include the loading and off-site removal of up to 3,500 cubic yards of soil from the project area to location within 15 miles of the project area to be determined.

The Respondent is assumed to have a complete understanding of the site, building characteristics, site utilities, and layout, sufficient to provide an accurate and sufficient bid to complete the full scope outlined in this RFP.

3.2. Additional Requirements

This project will comply with all codes, standards, regulations, and workers' safety rules that are administered by, federal agencies (e.g., U.S. Environmental Protection Agency (EPA), U.S. Occupational Health and Safety Administration (OSHA), and U.S. Department of Transportation); state agencies CDPHE, Colorado Department of Labor and Employment (CDLE), Colorado Department of Water Resources (CDWR), and Colorado Department of Wildlife (CDOW)); and any other local regulations and standards (City of Thornton and Adams County) that may apply. Because of the nature of the project, Respondent personnel working in different project areas may be required to maintain varying levels of certification for work in/with hazardous materials operations (HAZWOPR), asbestos abatement, construction, confined space operations, and/or trenching.

3.3. Schedule

Upon award, the Contractor shall attend a pre-project conference to be held at the facility within 1 week of the notice to proceed to discuss the project, expectations, schedules, and any logistical details prior to the start of site construction activities. Subsequent meetings will be as needed.

Owner desires completion of demolition and substantial completion of active site work no later than [DATE].

3.4. Bonding

Performance and Payment Bond – The Contractor must furnish a Performance and Payment Bond complying with applicable Colorado statutes, for one hundred (100) percent of the total contract price, excluding optional costs, conditioned that such contractor shall at all times promptly make payments of all amounts lawfully due to all persons supplying or furnishing him or his subcontractors with labor, equipment or material used or performed in the prosecution of the work provided for in such Contracts.

3.5. Warranty

The Contractor shall provide a one year Warranty for all work from the date of initial acceptance by the Owner.

3.6. Evaluation Criteria

In evaluating responses to this RFP, ERO will take into consideration the experience, capacity, and costs that are being proposed by the Respondent. The following Evaluation Criteria will be considered in reviewing submittals:

- Innovation for their proposed staging and/or approach to the project.
- Pricing.
- Schedule.
- Submittal Requirements.

RFP responses must be submitted via e-mail (pdf or scanned) attachment sent to ***jdenman@eroresources.com***. Each Respondent shall submit one copy of the following documents in a clear, legible, and 8.5 by 11 inch format. Respondents are advised to adhere to the Submittal Requirements. Failure to comply with the instructions of this RFP may be cause for rejection of submittals. Late Proposals will not be accepted.

ERO reserves the right to seek additional information to clarify responses to this RFP. Each response must include the following.

3.7. Response Requirements

3.7.1. Letter of Interest

Please submit a Cover Letter of Interest signed by a duly authorized officer or representative of the Respondent, not to exceed two pages. The Letter of Interest must also include the following information:

1. The principal place of business and the contact person, title, telephone/fax numbers, and email address.
2. A brief summary of the qualifications of the Respondent and team as it relates to the project.
3. Description of organization (e.g., corporation, limited liability company, or joint venture).
4. The Certification attached at the end of this RFP and incorporated herein by reference must be signed by the Respondent and attached to the Letter of Interest.

3.7.2. Threshold Requirements

These documents must be submitted and acceptable before ERO will review the Experience and Capacity proposal:

1. Evidence of Insurance: Commercial General Liability with limits not less than $2,000,000 per occurrence, not less than $5,000,000 aggregate; Pollution Liability Coverage with limits not less than $2,000,000; Workers Compensation and Employers Liability with limits not less than $1,000,000; and, Automobile Liability with limits not less than $1,000,000 per occurrence.
2. Upon award, Contractor shall be required to submit documentation of the following additional policies specifically identified within Attachment E and summarized below:
    a. Builder's Risk Insurance Policy

b. Installation Floater Insurance Policy
c. Products and Completed Operations Liability Insurance.

3. Upon award, Contractor will be required to submit documentation naming ERO and Owner, its officers, agents, and employees as additional insureds with respect to the Commercial General Liability, Auto Liability and, if required, Builder's Risk and Installation Floater coverages, as additional insured.

3.7.3. Main Proposal

Please provide the following information (this information is the main substance for the selection criteria):

1. **Experience.** Years of experience and detailed qualifications in performing the range of services on various property types in compliance with applicable standards. Past projects will be reviewed to determine if the Respondent has successfully completed projects similar in nature and scope.
2. **Projects.** Respondents shall provide narrative examples of three projects that are similar in nature to the project described in the RFP. Include project narrative (one paragraph), project date, final project cost, project reference contact name, and current phone number. Marketing materials may be included within this component, provided they meet the data requirements listed.
3. **Approach.** Project specific approach to implementation of the scope. Narrative is expected to include description of data needs, design considerations, contingencies for potential concerns, and other site-specific approach information as necessary to adequately evaluate the response. Areas of specific detail required to be within the main proposal response include, but are not limited to:
    a. Abatement and demolition coordination
    b. ACM and open-air demolition experience/management
    c. Demolition plan
    d. Revegetation/reseeding plan
    e. Other specific approaches or assumptions that may be reflected within the pricing proposal can be described within this section.
4. **Independent Contractors.** If you engage independent contractors, how many do you intend to hire? Do you intend to cover them with workers compensation? All independent contractors will be required to have workers compensation coverage, which will be the responsibility of the Respondent. Proposed GAC is required to be identified.
5. **Project Schedule.** Capacity to complete the project components within the specified time frame is critical. Contractors will be evaluated based on their proposed project schedule. Greater weight will be given if the project can be completed before the allotted time frame.
6. **Pricing proposal.** The Contractor will sign a unit price contract to include all work and services that will incorporate all specifications herein and to include payment terms of net-60 beginning on the last day of the month of Contractor invoice submitted and accepted for payment by ERO. All Contractor invoicing is subject to 5% retainage per Owner procurement requirements. Unit pricing for additional

components are requested (Attachment G), but are not included in the pricing evaluation.

7. **Quantity Acknowledgement.** Acknowledgement that Respondent has had the opportunity to independently verify bid quantities estimated in this RFP.
8. **Cost Escalation.** No escalation costs, fuel adjustments, or change orders requesting such will be honored for the life of the contract.
9. **Project Assumptions.** Contractor to provide a list of project-specific assumptions as they pertain to project implementation and pricing.

3.8. Selection Process

There will not be a public opening of bids. ERO and Owner will review qualifications in accordance with the evaluation criteria set forth herein. Proposals that are submitted in a timely manner and comply with the mandatory requirements of the RFP will be evaluated in accordance with the terms of the RFP. ERO and Owner may choose to "short list" prospective firms for further consideration, which may include interviews and/or negotiations. Any contract resulting from this RFP will not necessarily be awarded to the Respondent with the lowest price. Instead, the contract shall be awarded to the Respondent whose proposal presents the best overall value in accordance with criteria set forth in RFP.

It is the intent to award the contract to a **single** contractor to allow for efficiencies of mobilization, scheduling, phasing, and project implementation. ERO reserves the right, at its sole discretion, to award of a contract for the proposed work described herein, in whole or in part, subject to clarification, negotiation, and/or availability of funds.

3.9. Site Walk

ERO and Owner will conduct a **required** site walk at a time to be determined of the Project Area. Attendance of Respondents is required, and the purpose is to allow Respondents to gain a complete understanding of the site, conditions, and scope of work. Location of walk is the site address and access point off Quebec Street.

Required personnel for attendance are to include at a minimum the proposed site supervisor or project manager.

3.10. Questions

Questions regarding this RFP should be submitted in writing via email to **jdenman@eroresources.com** by 4:00 PM **[DATE]**.

3.11. Submittal Due Date

Responses to this RFP are due by **4:00 PM on [DUE DATE].** Responses to this RFP must be as an e-mail attachment to: Jack Denman at **jdenman@eroresources.com**. Each Respondent is responsible for successful transmittal of the proposal. Hard copies will not be accepted.

4. Certification Form

Note: THIS PAGE MUST BE COMPLETED AND INCLUDED WITH THE SUBMITTAL CERTIFICATION

The undersigned hereby certifies, on behalf of the Respondent named in this Certification (the "Respondent"), that:

- The Respondent fully understands the scope outlined in this RFP and presents the capabilities to execute;
- Concurs with specifications and bid quantities listed herein and, unless specifically noted within the submittal, does not materially object or dispute the bid quantities; Quantity Acknowledgement. Acknowledgement that Respondent has had the opportunity to independently verify bid quantities estimated in this RFP;
- Acknowledges that no escalation costs, fuel adjustments, or change orders requesting such will be honored for the life of the contract;
- The information provided in this RFP submittal to ERO is accurate and complete, and I am duly authorized to submit the same. I hereby certify that the Respondent has reviewed this RFP in its entirety and accepts its terms and conditions.

I hereby certify the above:

_____

(Name of Respondent)

_____

(Signature of Authorized Representative

_____

(Printed Name of Authorized Representative)

_____

(Title)

_____

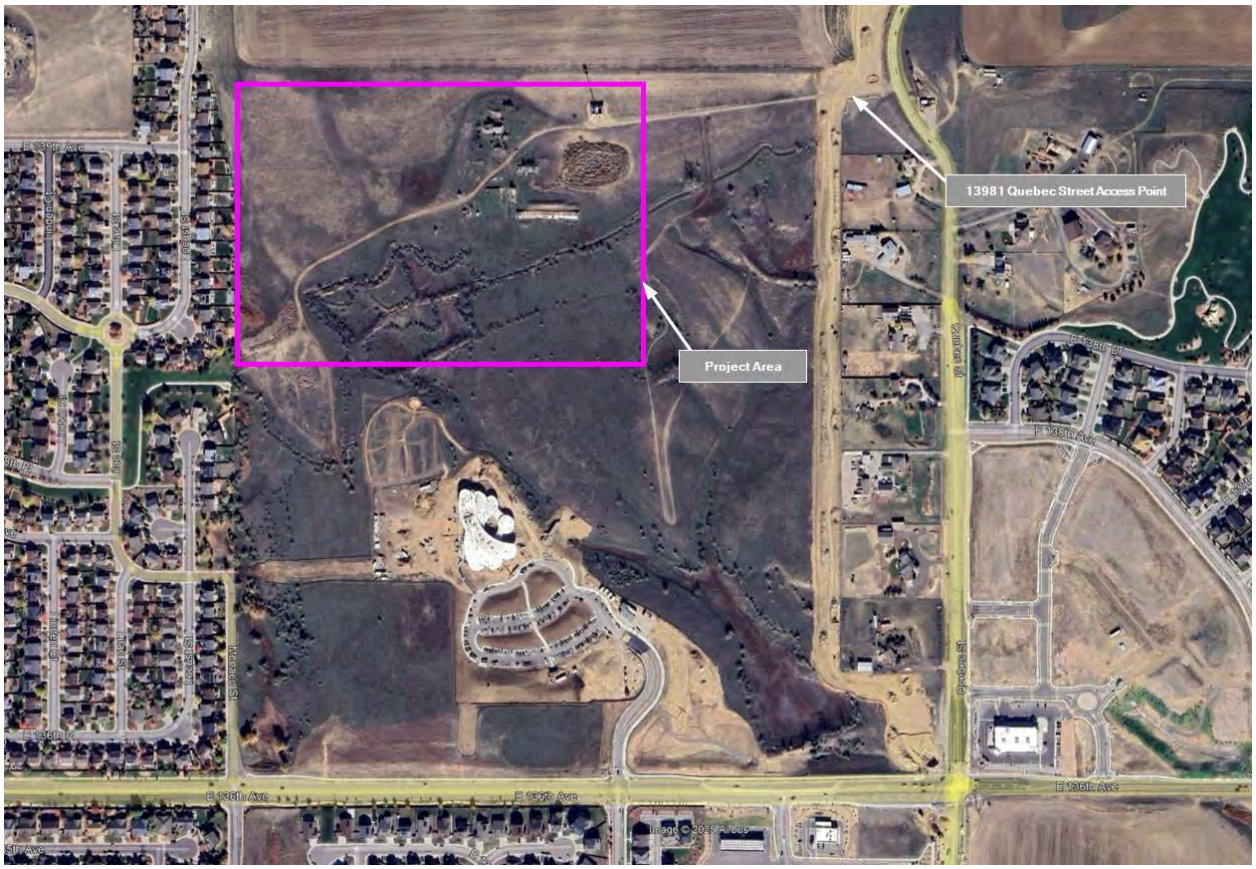
(Date)

5. RFP Submittal Requirements Checklist

Please provide this RFP Submittal Requirements Checklist with response to RFP:

- ❑ Letter of Interest
- ❑ Acknowledgement of Ability to Meet Threshold Insurance Requirements
- ❑ Main Proposal:
  - o Experience
  - o Past Projects
  - o Approach
  - o Project Team, including Subcontractors
  - o Project Schedule
  - o Pricing Proposal (Bid Sheet)
  - o Project Assumptions
  - o Certification Form

ATTACHMENT A: SITE LOCATION MAP



Aylor Open Space Property
13981 Quebec Street
Thornton, Colorado
Scale 1" = 140'

N

Exhibit C – Building Site Map

DS Environmental CONSULTING

ATTACHMENT B: ASBESTOS ABATEMENT SPECIFICATIONS

B.1 General

Numerous structures on the property are known to have documented ACM within the building components that either remains within the structures or has resulted in a major spill around the structures. Prior to demolition, the ACM and associated major spill will be required to be abated per CDPHE Air Quality Control Division (AQCD) Regulation No. 8. DS Environmental Consulting, Inc. (DS Consulting) has conducted an asbestos spill delineation and pre-demolition asbestos surveys of the buildings and is the designated asbestos consultant/inspector acting on behalf of the Owner. The results of the surveys are summarized within the reports referenced below and will require abatement per specifications contained therein prior to demolition and removal.

B.2 Related Documents

Documents pertaining to this section, and considered part of contract documents, are included in Attachment D and consist of the following:

1. Asbestos Spill Delineation Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO, Structures 3, 4, 5, 6, 7, 9, 10 and 11. October 28, 2025.
2. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 1 – Residence**. October 28, 2025.
3. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 2 – Well House**. October 28, 2025.
4. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 3 –Poultry Shed**. October 28, 2025.
5. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 4 – Sub-Grade Storage Cellar**. October 28, 2025.
6. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 5 – Chicken Coop Barn.** October 28, 2025.
7. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 6 – Poultry Barn**. October 28, 2025.
8. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 7 – Livestock Barn**. October 28, 2025.
9. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 8 – Livestock Lean-To**. October 28, 2025.
10. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 9 – Feed Shed**. October 28, 2025.
11. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 10 – Grain Silo**. October 28, 2025.
12. Pre-Demolition Asbestos Inspection Report - City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO: **Structure 11 – Mobile Camping Trailer**. October 28, 2025.
13. Asbestos Abatement Variance Request Work Plan And Project Design for Controlled Demolition of Asbestos Containing Materials. Prepared by DS Consulting. December 23, 2025.

14. Approval of December 23, 2025 Asbestos Abatement Variance Request Work Plan And Project Design for Controlled Demolition of Asbestos Containing Materials. January 19, 2026.
15. Addenda as necessary.

B.3 Asbestos Abatement

Asbestos abatement shall be conducted in accordance with the documents listed above, specifications and regulations referenced therein, and current Colorado regulations. Contractor shall be responsible for any and all deadlines, permit requirements, certifications, and project closure documentation as described in the attachments or required under the applicable regulations.

Contractor shall coordinate directly with DS Consulting for asbestos abatement clearance as part of this contract. Contractor will be provided an allowance of three post-abatement clearances at Owner's cost. Contractor is limited to one follow-up clearance per unit at Owner's cost. **Additional clearances required because of inadequate or insufficient abatement activities will be charged against the Contractor billings at actual cost plus 15% as billed by DS Consulting.**

B.4 Permitting

Contractor is required and responsible to develop project abatement plans, obtain permits, and conduct abatement in full compliance with the referenced specifications herein, CDPHE AQCD Regulation No. 8, and approved plans. In the event of a conflict, CDPHE AQCD Regulation No. 8 takes precedence in consultation with, and confirmation by, DS Consulting.

B.5 Coordination

Contractor will attend up to four progress conferences, anticipated to be held every three weeks until substantial completion. The purpose of these conferences will be to ensure coordination among project personnel, contractors, utilities, and permitting. Informal meetings or conferences can be expected to be held as necessary or if conditions warrant.

Upon award, Contractor shall schedule appropriate and required notification to regulatory agencies to account for mandatory waiting periods**.**

B.6 Utilities

At the time of award, the following utility details are known, but Contractor will be required to submit notifications to Colorado 811 and associated utility locating for any intrusive activities.

Natural Gas:	No known utility.
Electrical:	Single above-ground line with availability for temporary power drop.
Water:	No on-site utility.
	Fire hydrants along Locust Street west of project area.
Sewer:	No onsite utility.
Abandoned oil and gas wells	Exist on the property, exact locations are unknown.

Contractor shall provide sanitary services for all site personnel.

Contractor is responsible for any temporary heat and associated freeze plans necessary during the course of the project, costs for which are to be included within base bid.

ATTACHMENT C: DEMOLITION SPECIFICATIONS

C.1 General

This task consists of the demolition and removal of all buildings, foundations, building components, equipment, pipes, and debris within the project area and is to conform to the City of Thornton Standards & Specifications as applicable, available at **City of Thornton Standards and Specifications | City of Thornton**. All construction, demolition debris, and waste shall be transported to a permitted solid waste landfill authorized to accept such wastes or appropriate recycling facility. On-site soils currently stored may be used to fill to fill depressions to adjacent grades once buildings and foundations have been removed.

C.2. Site Preparation

C.2.a. Security

The Contractor shall erect work area construction fencing as necessary to control access and site safety within the confines of the larger Aylor Property.

C.2.b. Utilities

At the time of award, no on-site buried utilities are known within the area of activity, but Contractor will be required to submit notifications to Colorado 811 and associated utility locating for any intrusive activities.

C.2.c. Permitting

Prior to commencing site activities, Contractor is required to obtain all appropriate state and local permits associated with the project. Table 1 contains a non-exhaustive list of anticipated permits that may be needed for this project. ERO and Owner make no representation that the list provided is inclusive of all necessary permits. The Contractor is solely responsible for preparing and obtaining all appropriate permits for the project.

Table 1. Known permit requirements and estimated timelines.

Permit Name	Entity	Deadline est.
CDPHE Demolition Notification Application	CDPHE Air Pollution Control Division	10 days prior to commencing demolition activities
CDPHE Stormwater Discharges Associated with Construction Activity Permit and Storm Water Management Plan	CDPHE WQCD	10 days prior to site activities
Water Meter (Hydrant) Permit	Thornton Building Dept.	Over-the-counter, deposit Specific days for acquisition
Storm Water Management Plan and Permit	Thornton Development Svcs.	5+ days
City of Thornton CIP Construction Permit	Thornton Building Dept.	5+ days
Traffic Control Plan	Thornton Building Dept.	5+ days

C.2.d. Storm Water Management Plan

Site activities are expected to exceed 1.0 acres of land area and as part of project permitting and submittals, the Contractor will be required to develop a Stormwater Management Plan for

compliance with Colorado Discharge Permit System (CDPS) General Permit COR400000, Stormwater Discharge Associated with Construction to manage stormwater generated as part of construction activity and prevent the discharge of potentially contaminated waters to surface waters within or adjacent to the site.

The Contractor will be required to obtain a City of Thornton Stormwater Quality Permit and be the lead entity for the storm water permit until site activities are completed to the point that the Inactivation Notice can be submitted. Contractor is responsible for all erosion-control measures, maintenance, and inspections in accordance with the SWMP plan and associated permits for the duration of the project.

Stormwater management and all CDPS compliance includes, but is not limited to, obtaining discharge certification, treatment, monitoring and reporting, and compliance with general permit coverage requirements. Because the permit will include the Owner property Contractor/Developer shall consult with Owner **prior** to permit application submittals.

C.2.e. Stabilization

Upon completion of site activities, Contractor shall prepare disturbed ground with appropriate discing, soil amendments, contouring, and hydroseed (or use equivalent form of stabilization) prior to demobilization. Seed mix shall be PBSI Native Prairie Mix and Contractor shall provide for twelve (12) weekly watering events, post construction, using a water truck (hydrant available off-site). Hydroseed stabilization and watering is not considered “active work” with respect to the completion date. Cost basis is based on an estimated 10,000 square yards at a 500 square yard unit rate.

Owner will accept transfer of stormwater permit upon completion of 12 weeks of site watering.

C.2.f. Electrical Transformers

No transformers are anticipated to be removed by the Contractor.

C.2.g. Utilities

Pole-mounted electrical service is the only known utility on the site.

Contractor is responsible for any temporary heat necessary during the course of the project, costs for which are to be included within base bid.

C.3. Structure Demolition

Prior to structure demolition, the Contractor will obtain all necessary permits from CDPHE, City of Thornton, and any and all applicable other entities not identified in the RFP, for the demolition of the structures. All structures, foundations, perturbances, and associated debris will be removed from the site.

Contractor is required to coordinate internally with team members for a smooth transition between asbestos abatement and demolition activities while keeping ERO/Owner apprised of schedule.

C.3.a. Materials Salvage

The structures will be inspected prior to demolition for salvageable materials. These materials are encouraged to be salvaged and recycled to the greatest extent feasible. Site demolished and salvaged materials shall become the Contractor's property at handover and shall be removed from the site for either disposal or recycling at the Contractor's discretion.

C.3.b. Chemical Removal

It is anticipated that all known petroleum products and hazardous materials will be removed from the buildings prior to commencement of demolition activities. In the event containers of materials are identified, Contractor shall have the ability to safely provide stabilization, containerization, and segregation of materials until Owner can schedule removal.

C.3.c. Lighting Waste Removal

The structures are not known to contain overhead mercury-fluorescent lamps, mercury switches, or lighting ballasts. If encountered, Contractor shall systematically remove, consolidate, and package any lamps or ballasts encountered for disposal as Universal Waste under Colorado Hazardous Waste Regulations. Contractor shall take caution so as to minimize breakage of lamps during removal. Waste containers will be DOT-approved for the waste contained, labeled, and staged in a secure location until disposal.

Costs for waste disposal of the lamps, ballasts, and switches is **not** included in this RFP and will be addressed as an add-on with Owner reimbursing actual cost +15% for disposal. Contractor shall provide documentation as to proper disposal of all special wastes and price documentation.

C.3.d. Structures

Structures and components will be demolished, crushed, and transported off-site for disposal or recycling. Structure areas are defined in Figure A-2, Attachment A. At no time will structures be burned, buried, or otherwise not removed from the site. All building components within the footprint of the building will be demolished and removed from the site.

Building foundations shall be removed up to a depth of 10 feet below the original flooring. Owner shall be notified within 24 hours of encountering subgrade extensions such as caissons, footers, or other building components that extend deeper than 10 feet below the original flooring elevation. Timely notification and confirmation by the owner is required prior to change order application consideration. Special notes:

Contractor will include abandonment and removal of residential septic system associated with Structure 1 – Residence.

Contractor shall protect Structure 2 – Well House such that the potable water well within is not damaged.

C.3.e. Snow Removal

Contractor shall be responsible for any snow removal within their designated work area and any extensions thereof for safe and efficient operations. Owner will provide snow removal for areas outside of work area.

C.3.f. Vegetation

Vegetation removal, including trees, shall be kept to a minimum to facilitate stormwater control and City arbor requirements, but can be removed as needed on the site.

C.3.g. Concrete/Asphalt

No existing hard surfaces are within the project area aside from building foundations.

C.3.h. Excavating, Filling, and Grading

All excavations shall be backfilled with on-site soils. Final site grading shall conform to City of Thornton general construction grading permit requirements to minimize erosion, match surrounding grade, and be stabilized upon completion.

C.3.i. Soil Removal

Owner desires the potential removal of up to 3,500 cubic yards of imported soils from various stormwater pond management activities. Because the ultimate disposition location is unknown, Respondent is to assume a location with trucking accessibility and within 15 miles of the Aylor Property. Contractor shall load, transport and discard the soils at a designated location. All activities to be conducted within the same project work area as the remaining activities described herein and subject to all the same site control measures.

Because the ultimate soil disposition is unknown, this tasks is identified as a bid-alternate on the Bid Sheet located in Attachment G.

C.3.j. Site Control Measures

Contractor recognizes that activities will occur adjacent to a residential neighborhood and in a highly visible location. Contractor will minimize the creation of fugitive dust associated with site demolition to the greatest extent feasible using wet demolition, misting, and wetting of activities as needed. Visible dust emissions will not be acceptable.

Contractor shall conduct demolition operations and remove debris to ensure minimum interference with roads, streets, walks, and other adjacent facilities and roads.

All loads leaving the site will be covered to prevent spillage/release of materials onto roads and highways.

All vehicles leaving the site will be free of soil and sediment, consistent with SWMP requirements; the site shall use a Vehicle Tracking Pad to prevent track-out onto public streets.

Contractor will conduct demolition operations to prevent injury to people, adjacent properties, and equipment and ensure safe passage of authorized people around the demolition area.

Contractor shall provide and ensure roadworthiness and full liability for any and all vehicles leaving the project area carrying project materials, debris, equipment, and personnel. ERO/Owner retains

the right to prevent any vehicle from leaving the project site due to safety or road worthiness concerns until the objectionable situation is rectified.

C.3.k. Site Services

Hydrants are located west of the project area along Locust Street. These hydrants are available for metered water for demolition activities but will require water meter and permit from the City of Thornton.

Contractor shall provide adequate sanitary facilities for personnel independent of any services on-site.

C.3.l. Access

Project access is via unimproved access off Quebec Street, east of the project site.

C.3.m. Explosives

Use of explosives is not permitted.

C.3.n. Burning

Burning of any structure, vegetation, material, or debris is not permitted.

C.3.o. Timing

Available work hours are between 7 a.m. and 6 p.m. during daylight hours.

Trucking of debris, waste, or any other materials from the site is permitted only between the hours of 8:30 am and 4:00 pm.

No other timing restrictions apply and a 10-hour workday is at the discretion of the Contractor.

Weekend work is permitted with prior notification, but ERO/Owner will not compensate for overtime, double-shift or other costs incurred associated with overtime work.

ERO/Owner will not compensate for weather delays beyond schedule extensions if requested.

Work is prohibited to occur on any federal or City of Thornton holidays unless an emergency.

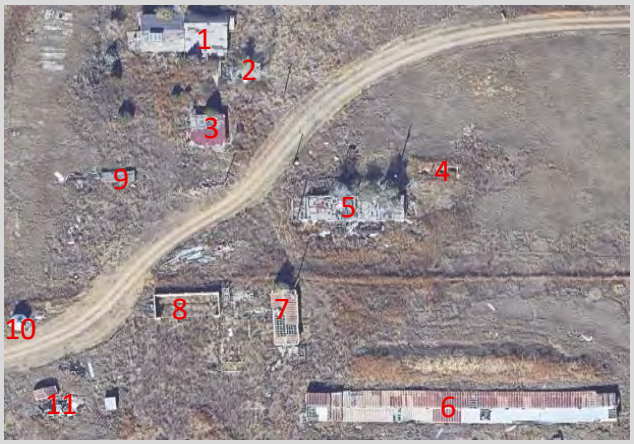
ATTACHMENT D PROJECT DOCUMENTS AND SPECIFICATIONS

"The trusted choice for your environmental & industrial hygiene needs."

ASBESTOS SPILL DELINEATION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structures 3, 4, 5, 6, 7, 9, 10 and 11



PRESENTED TO:

Mr. Jack Denman, Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123 & 28898
Date of Inspection: July 15, 2024
September 9, 2025
October 28, 2025

Front Range 7555 W 10th Ave
Suite A, Lakewood, CO 80214

Mountains PO Box 6864
Avon, CO 81620

Western Slope PO Box 3793
Aspen, CO 81612

Web dsconsultinginc.com

Direct (303) 286-9094

Fax (303) 986-0121

Table of Contents

1.0 Introduction

An asbestos inspection for demolition was performed on the structures associated former poultry farm. The site is comprised of 11 structures, 7 of the structures have significantly damaged friable asbestos that has been impacted by weathering, deterioration and partial structural collapse creating a Major Asbestos Spill. The ACMs that were significantly damaged include various roofing tars and tar sealants, roofing felt paper, window glazing, exterior caulking and cement board siding shingles. Below is a brief description of each structure on the site:

1. **Structure 1 Residence** – single-story wood framed constructed home, ~1,911 sq. ft. The structure is comprised of the original house (east portion) with the living room, den and kitchen. There is an addition on the west portion that contains bedrooms, closets, bathrooms and an unfinished partial basement.
2. **Structure 2 Well House** – single-story wood framed constructed building with corrugated metal siding, tar/shingle roofing and concrete floor, the structure is ~90 sq. ft. and it house the well and associated pump.
3. **Structure 3 Poultry Shed** – single-story wood frame constructed building with metal siding, ~950 sq. ft. The structure has a carport on the north side with gravel floor ~620 sq. ft., the south side interior is an unfinished space with corrugated metal walls and concrete floor ~330 sq. ft.
4. **Structure 4 Storage Cellar** – a sub-terranean storage cellar wood framed constructed structure with concrete stairs accessing the east side, the structure is ~400 sq. ft. and it was used as a storage cellar/shelter. The cellar was accessible during the initial inspection in 2022; however, the interior was no longer safely accessible due to collapse of a portion of the roof and the entry during a follow-up inspections in 2024 and 2025.
5. **Structure 5 Chicken Coop Barn** – single-story CMU constructed building with a wood framed roof, ~1,710 sq. ft. The west CMU wall of the structure has collapsed and the roof is hanging on the west side of the building.
6. **Structure 6 Poultry Barn** – a partially sub-grade single-story wood framed constructed building with corrugated metal roof/siding and dirt floor, the structure is ~6,160 sq. ft. The wood framing supports of the structure have partially collapsed.
7. **Structure 7 Livestock Barn** – single-story CMU constructed building with a wood framed/metal sheeted roof, ~885 sq. ft. The north 2 "tack rooms" have concrete floors ~280 sq. ft. and the south stable area has a dirt floor ~605 sq. ft. The east CMU wall of the structure is collapsing on the north half of the building.
8. **Structure 8 Livestock Lean-to** – a 3-sided wind shelter structure constructed of unfinished CMU block. There is a dirt floor, no roof and the structure has a foot-print of ~1,280 sq. ft.
9. **Structure 9 Feed Shed** – a wood framed constructed structure with metal roofing, the structure is ~240 sq. ft. and it was used as a feed storage shed.
10. **Structure 10 Silo** – a sheet metal constructed structure with metal roofing and metal pan floor, the structure is ~150 sq. ft. and it was used to store grains.
11. **Structure 11 Mobile Camping Trailer** – a metal constructed trailer with wood floor on a single axel, the trailer is ~145 sq. ft.

The aggregate amount of significantly damaged ACMs in structures 3, 4, 5, 6, 7, 9, 10 and 11 exceeds the commercial trigger levels of 160 sq. ft. (formerly residential, scheduled for demolition and will not be re-occupied), resulting in a Major Asbestos Spill. The purpose of this report is to delineate the areas of the buildings and surrounding exterior areas that are part of the Major Asbestos Spill, both interior and exterior, for the purpose of aiding the forthcoming abatement activities.

2.0 Summary of Findings

1. **Structure 1 Residence** – No significantly damaged ACMs, not included in the spill.
2. **Structure 2 Well House** – No ACMs present, not included in the spill.
3. **Structure 3 Poultry Shed** – There is ~16 sq. ft. of friable significantly damaged cement board shingle pieces & debris throughout the interior of the poultry processing room, the entire interior of the poultry processing room and associated contents are included in the spill area. No ACM debris was observed on the exterior.
4. **Structure 4 Storage Cellar** – There is ~12 sq. ft. of friable significantly damaged black fibrous tar paper & associated tar throughout the interior, the entire interior is included in the spill area. No ACM debris was observed on the exterior; the debris is confined to the interior pit of the cellar including ~400 sq. ft. of soil.
5. **Structure 5 Chicken Coop Barn** – There are ~216 sq. ft. of various friable significantly damaged black tar sealants throughout the interior, the entire interior is included in the spill area, concrete floor is ~1,710 sq. ft. There was ACM debris observed on the exterior, the debris covers ~3,201 sq. ft. of soil and 40 sq. ft of concrete.
6. **Structure 6 Poultry Barn** – There is ~1,240 sq. ft. of black/brown fibrous tar paper throughout the interior, the entire interior is included in the spill area including ~6,160 ft² of interior soil. There was ACM debris observed on the exterior, the debris covers ~7,890 sq. ft. of soil.
7. **Structure 7 Livestock Barn** – There are ~28 sq. ft. of friable significantly damaged tar sealant and window glazing debris throughout the interior, the entire interior is included in the spill area including ~885 ft² with ~605 sq. ft. of interior soil. There was ACM debris observed on the exterior, the exterior debris covers ~1,393 sq. ft. of soil.
8. **Structure 8 Livestock Lean-to** – No ACMs present, not included in the spill.
9. **Structure 9 Feed Shed** – There is ~15 sq. ft. of friable significantly damaged off-white fibrous paper throughout the interior, the entire interior and ~240 sq. ft. of debris is included in the spill area. No ACM debris was observed on the exterior.
10. **Structure 10 Silo** – There is ~44 sq. ft. of friable significantly damaged tar sealant. There is no debris on the interior, ~150 sq. ft. of soil under the silo is included in the spill area.
11. **Structure 11 Mobile Camping Trailer** – There are ~119 sq. ft. of friable significantly damaged exterior caulking and window glazing debris throughout the interior, the entire interior is included in the spill area. There was ACM debris observed on the exterior, the debris covers ~298 sq. ft. of soil around and under the trailer.

Refer to *Appendix B* for the *Spill Areas Floor Plan for Interior and Exterior Locations*.

Site Photographs

Description: Structure 9, ACM Paper
7/15/24 Inspection

Description: Structure 9, ACM Paper Debris
7/15/24 Inspection

Description: Structure 9, ACM Paper Debris
7/15/24 Inspection

Description: Structure 3, ACM Cementous Siding
7/15/24 Inspection

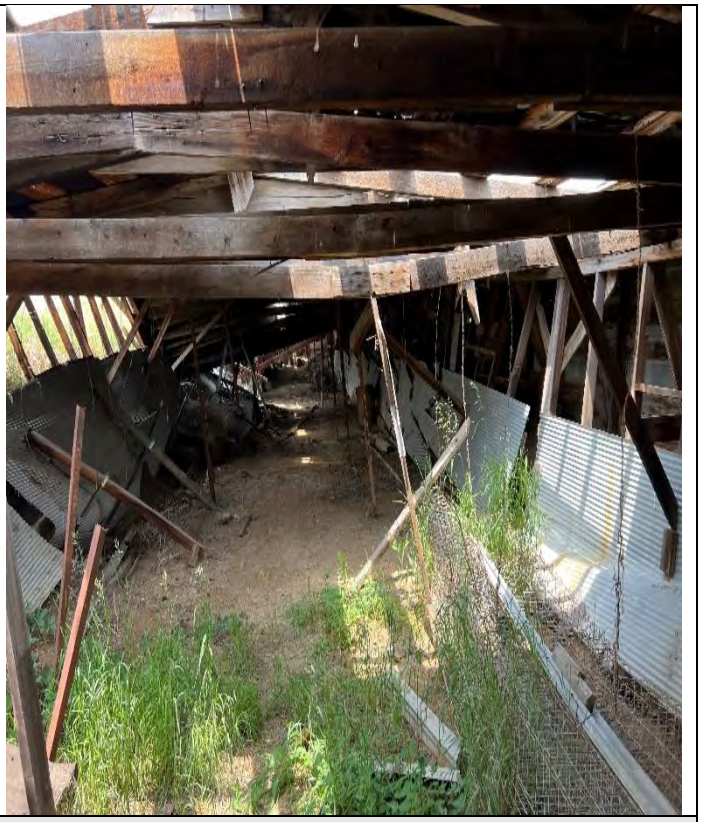
Description: Structure 3, ACM Cementous Siding
7/15/24 Inspection

Description: Structure 5, ACM Roofing Tar & CMU Patch Tar
7/15/24 Inspection

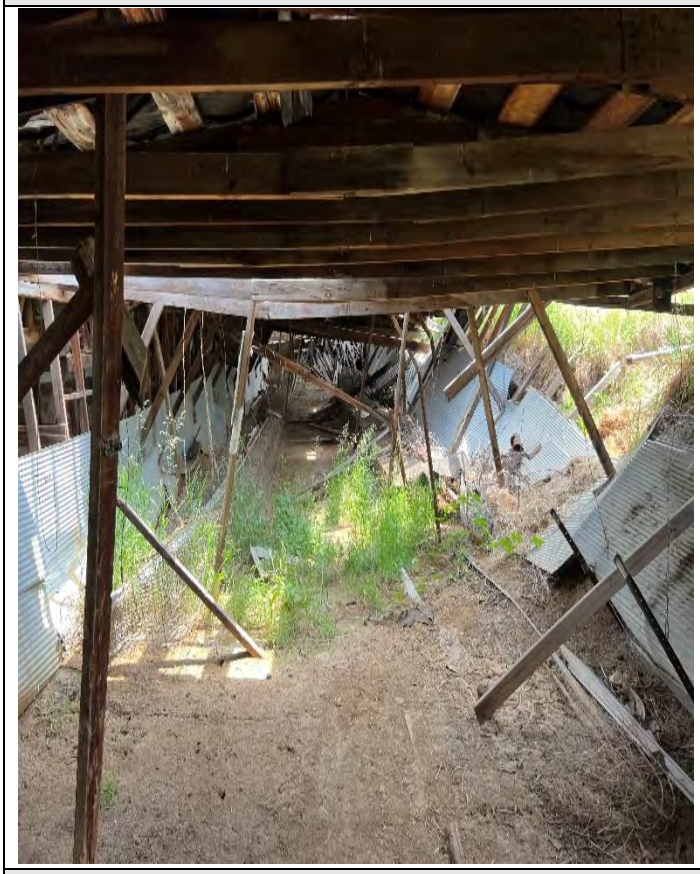
Description: Structure 5, ACM Roofing Tar & CMU Patch Tar
7/15/24 Inspection

Description: Structure 5, ACM Roofing Tar & CMU Patch Tar
7/15/24 Inspection

Description: Structure 6, ACM Roofing Tar Paper Debris 7/15/24 Inspection



Description: Structure 6, ACM Roofing Tar Paper Debris 7/15/24 Inspection



Description: Structure 6, ACM Roofing Tar Paper Debris 7/15/24 Inspection

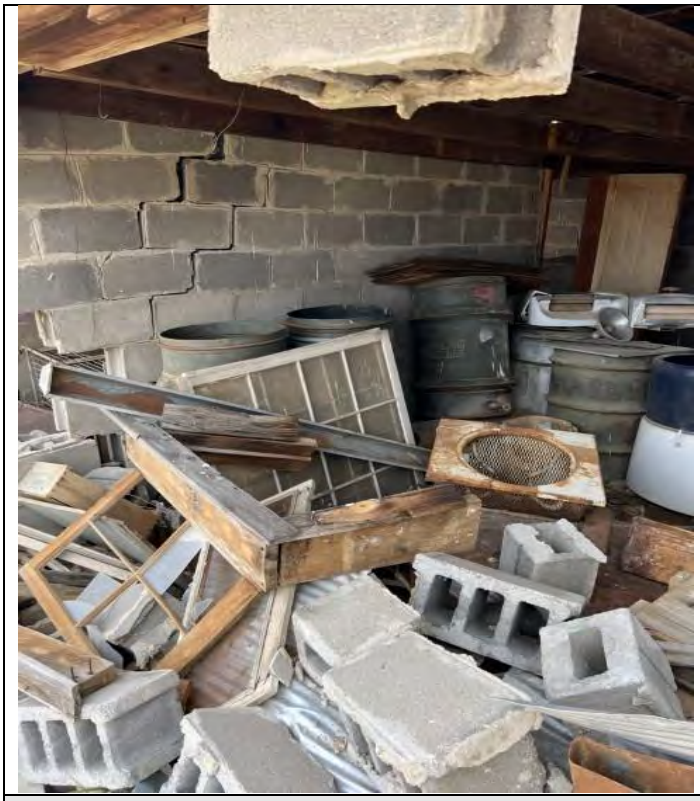
Description: Structure 6, ACM Roofing Tar Paper Debris 7/15/24 Inspection

Description: Structure 6, ACM Roofing Tar Paper Debris
7/15/24 Inspection

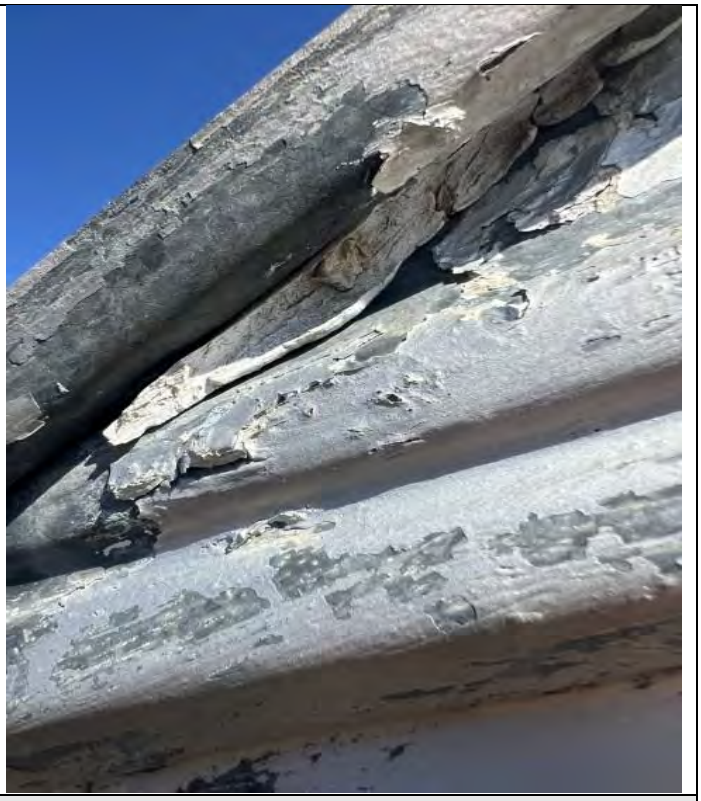
Description: Structure 3 East Entry
7/15/24 Inspection

Description: Structure 6, ACM Roofing Tar Paper
7/15/24 Inspection (Prior to Cave-In)

Description: Structure 7, ACM CMU Patch Tar
7/15/24 Inspection

	
Description: Structure 7, ACM Window Glazing 7/15/24 Inspection	**Description: Structure 7, ACM Window Glazing 7/15/24 Inspection**
	
Description: Structure 10 7/15/24 Inspection	**Description: Structure 10, ACM Tar Sealant 7/15/24 Inspection**

Description: Structure 11
7/15/24 Inspection



Description: Structure 11, ACM Caulking
7/15/24 Inspection

Description: Structure 11, ACM Glazing Debris
7/15/24 Inspection

Description: Structure 11, ACM Glazing Debris
7/15/24 Inspection

Description: Structure 3
9/9/25 Inspection

Description: Structure 3
9/9/25 Inspection

Description: Structure 5
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 5 Debris
9/9/25 Inspection

Description: Structure 6 Debris
9/9/25 Inspection

Description: Structure 6 Debris
9/9/25 Inspection

Description: Structure 7 Debris
9/9/25 Inspection

Description: Structure 9 Debris
9/9/25 Inspection

	
Description: Structure 5 **10/28/25 Inspection**	**Description: Structure 5** **10/28/25 Inspection**
	
Description: Structure 4 **10/28/25 Inspection**	**Description: Structure 4** **10/28/25 Inspection**

Description: Structure 6
10/28/25 Inspection

Description: Structure 6
10/28/25 Inspection

Description: Structure 7
10/28/25 Inspection

Description: Structure 7
10/28/25 Inspection

3.0 Inspector & Firm Certifications

The sampling detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman is a CDPHE certified Building Inspector and Air Monitoring Specialist; having certification number 14348, Mr. Moss is a CDPHE certified Building Inspector and Air Monitoring Specialist; having certification number 28901 (*see Appendix A for certificates*).

4.0 Conclusions & Recommendations

Upon review and consideration of all pertinent information acquired during DS's inspection, DS recommends all areas that are included in the spill area listed above in Section 2.0 Summary of Findings due to visible ACM debris shall be included in the major spill area and undergo professional abatement activities. Refer to *Appendix B* for the *Spill Areas Floor Plans*. All ACM debris and associated contaminated debris/contents and 2 inches of soil (where present) must be abated in compliance with *Regulation 8, Section III.T*.

Some of the structures have sustained extensive structural damage, a qualified (through training, education or experience) State or local governmental representative, or, if no qualified governmental representative is available, a Colorado Licensed Professional Structural Engineer should assess if the structures are structurally safe to facilitate abatement activities.

5.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains non-friable asbestos-containing materials, such as caulking, mastic or resilient floor tiles. However, demolition must be completed without causing the non-friable ACM to be rendered friable. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g. glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e. crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers in excess of the permissible exposure limit of 0.1 f/cc of air. Contractors are must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

6.0 Major & Minor Asbestos Spill Response Actions

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

"Minor Asbestos Spill" means an asbestos spill involving the disturbance of ACM in an amount less than or equal to the trigger levels. If a minor asbestos spill is confirmed to be present, this section is considered guidance.

7.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 sq. ft. on surfaces, or in a school building in which the

amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 sq. ft. on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be available on-site at all times, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 sq. ft. on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC. Project Managers must have proof of Colorado certification as an asbestos Project Designer and Air Monitoring Specialist in accordance with Section II of CDPHE Regulation 8 as well as a minimum of one (1) year of experience supervising, overseeing or monitoring asbestos abatement projects. A 4-year college degree in industrial hygiene, a degree in environmental health with a major concentration in industrial hygiene, or the possession of a certified industrial hygienist (CIH) certificate given by the American Board of Industrial Hygiene (ABIH) may be substituted for the Colorado asbestos Air Monitoring Specialist certification.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

8.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for error in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions at a later date. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding or billing purposes. Contractors or consultants reviewing this report must draw

their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

9.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 11, 2025
Expires: July 12, 2026

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

Chris Lehman 2025 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Air Monitoring Specialist*

Issued: August 08, 2025
Expires: August 29, 2026

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

Chris Lehman 2025 AMS Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025
Expires: June 05, 2026

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

David Moss 2025 Inspector Certification: 28901

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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:

Air Monitoring Specialist*

Issued: June 13, 2025
Expires: July 05, 2026

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

David Moss 2025 AMS Certification: 28901

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 12, 2024

Expires: July 12, 2025

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Air Monitoring Specialist*

Issued: August 16, 2024

Expires: August 29, 2025

* 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

Chris Lehman 2024 AMS Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2023 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Air Monitoring Specialist*

Issued: August 07, 2023

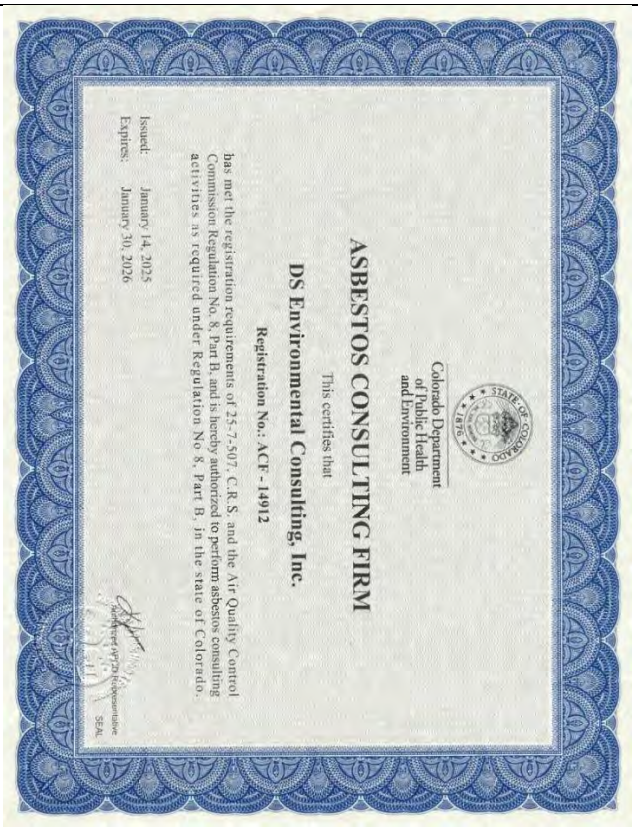
Expires: August 29, 2024

* 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

Chris Lehman 2023 AMS Certification: 14348



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

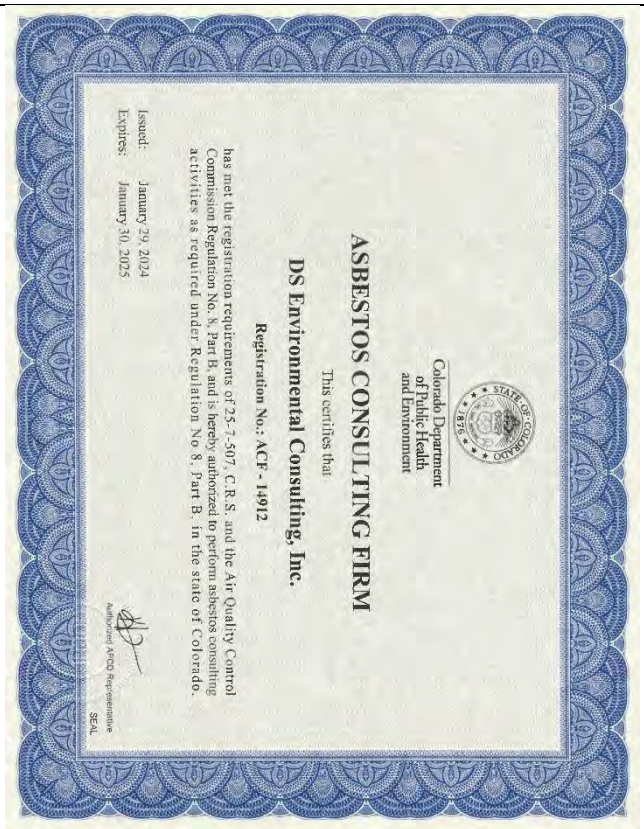
has met the registration requirements of 25-7-507, C.R.S. and the Air Quality Control Commission Regulation No. 8, Part B, and is hereby authorized to perform asbestos consulting activities as required under Regulation No 8, Part B, in the state of Colorado.

Issued: January 14, 2025
Expires: January 30, 2026

Authorized APCD Representative

SEAL

2025 Firm Certification: 14912



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

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

Issued: January 29, 2024
Expires: January 30, 2025

Authorized APCD Representative

SEAL

2024 Firm Certification: 14912

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

Issued: January 30, 2023
Expires: January 30, 2024

Authorized APCD Representative

SEAL

2023 AMS Certification: 28901

Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

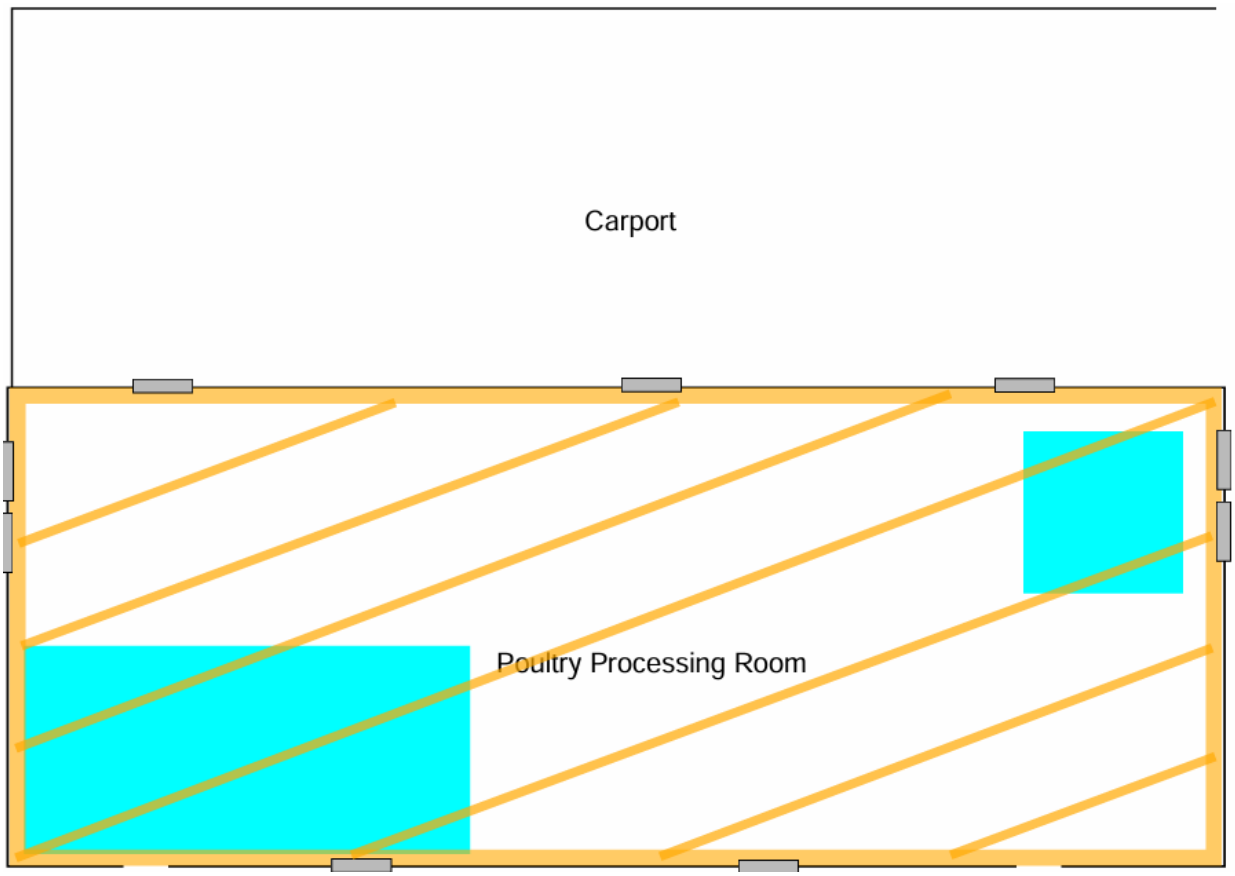
Issued: January 24, 2022
Expires: January 30, 2023

Authorized APCD Representative

SEAL

2022 Firm Certification: 14912

APPENDIX B: SPILL AREAS FLOOR PLANS



Key:

Un-Installed Cement Siding (3-CB1)

Tar on Concrete Slab Cracks (3-FTP1)

N.T.S.

NORTH

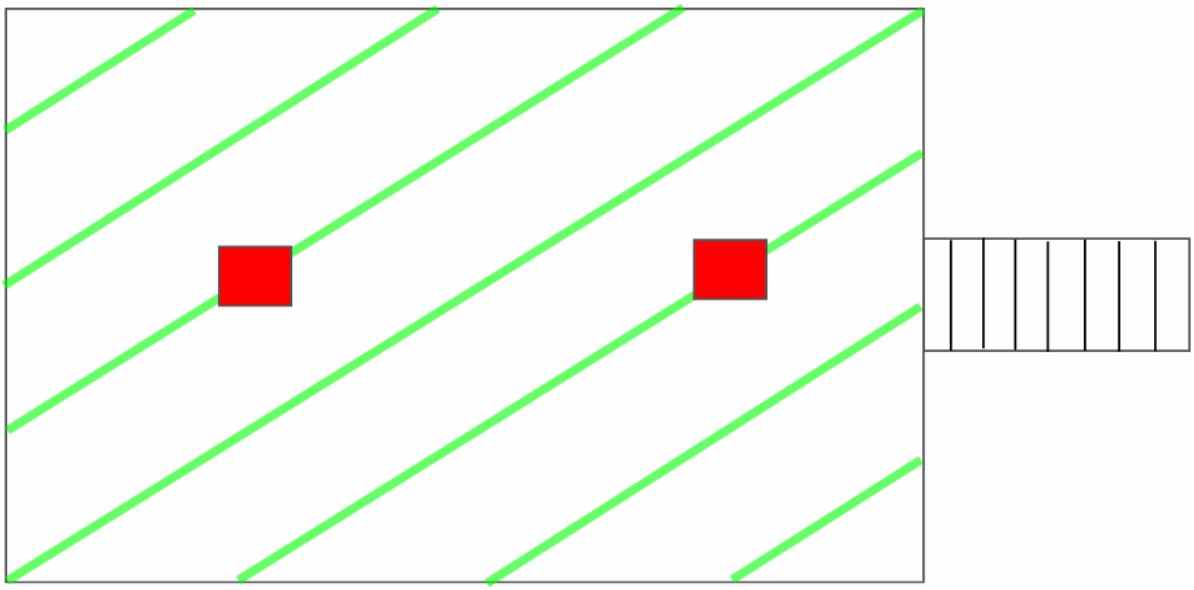
TITLE: Aylor Parks & Open Space - Structure 3 - Poultry Shed Major Spill Interior Locations

DATE: 9/9/25

DS JOB: 27123

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

Black Fibrous Tar/Paper (4-RT1)

Black Fibrous Tar/Paper (4-RT1)
(Residual Material/Debris)

N.T.S.

NORTH

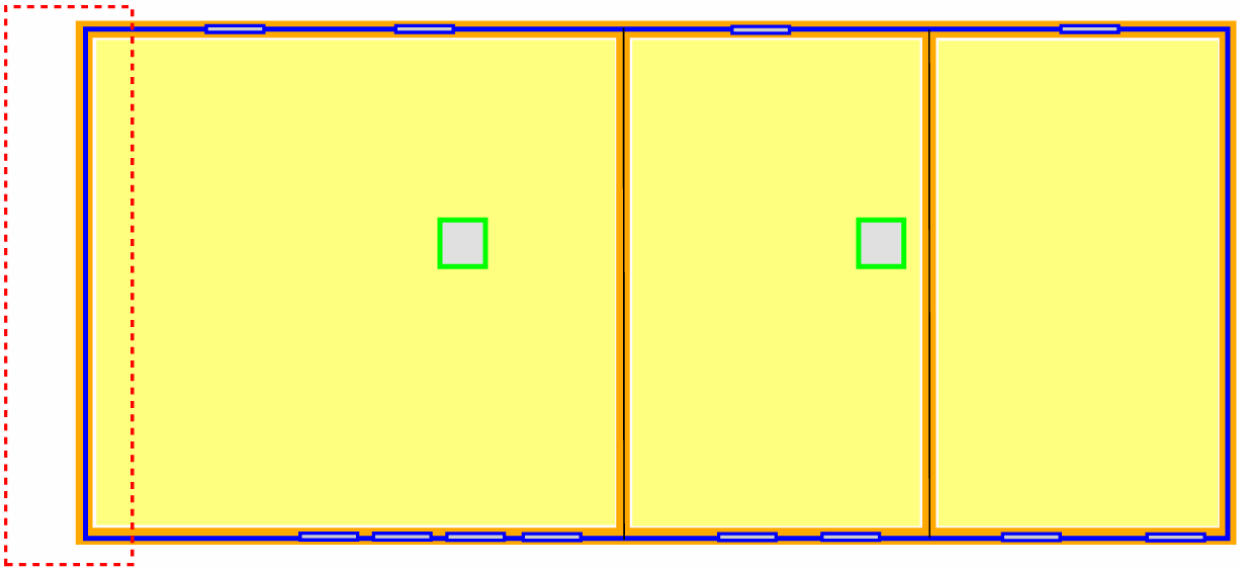
TITLE: Aylor Parks & Open Space - Structure 4 - Sub-Grade Storage Cellar - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

- Roof Flashing Tar (5-RT1)
- Interior/Exterior Tar Patch Material (5-CMUP1)
- Interior/Exterior Tar Sealant (5-CMUP2)
- Collapsed CMU Wall Debris with Tar (TAR1 & TAR2)
- Interior ACM Debris

N.T.S.

NORTH

TITLE: Aylor Parks & Open Space - Structure 5 - Chicken Coop Barn - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

Key:

ACM Roof Tar Paper (6-RP1) & (6-RM1) and Interior Debris & Associated Soil

N.T.S.

NORTH

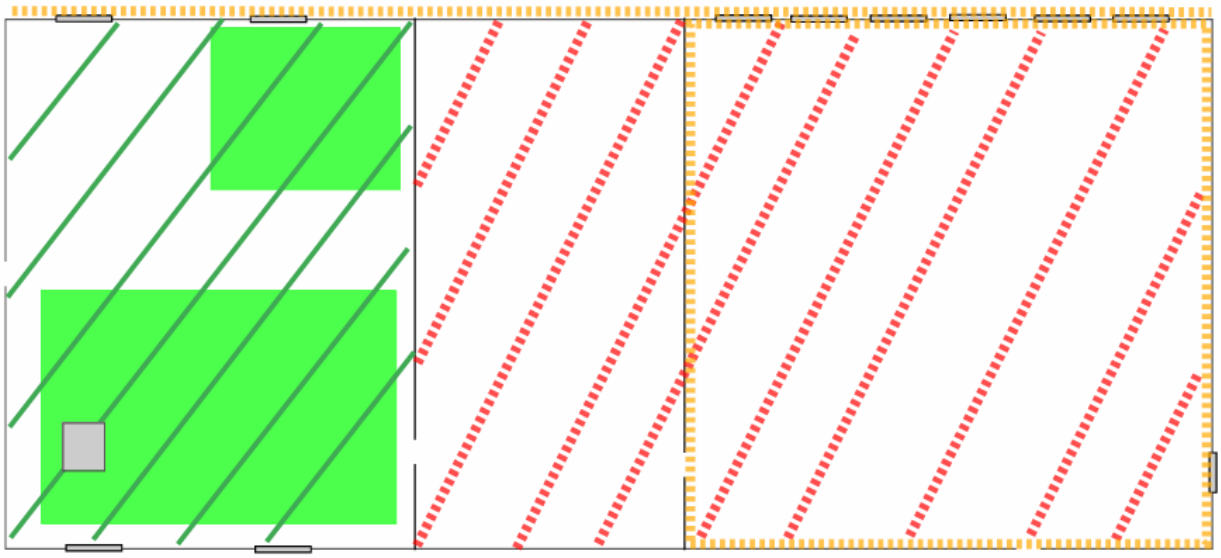
TITLE: Aylor Parks & Open Space - Structure 6 - Poultry Barn - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

- Grey Window Glazing on Sashes (7-WG2)
- CMU Wall Patch Tar (7-CMUP2)
- Window Glazing Debris (7-WG2)
- Tar Debris (7-CMUP2)

N.T.S.

NORTH

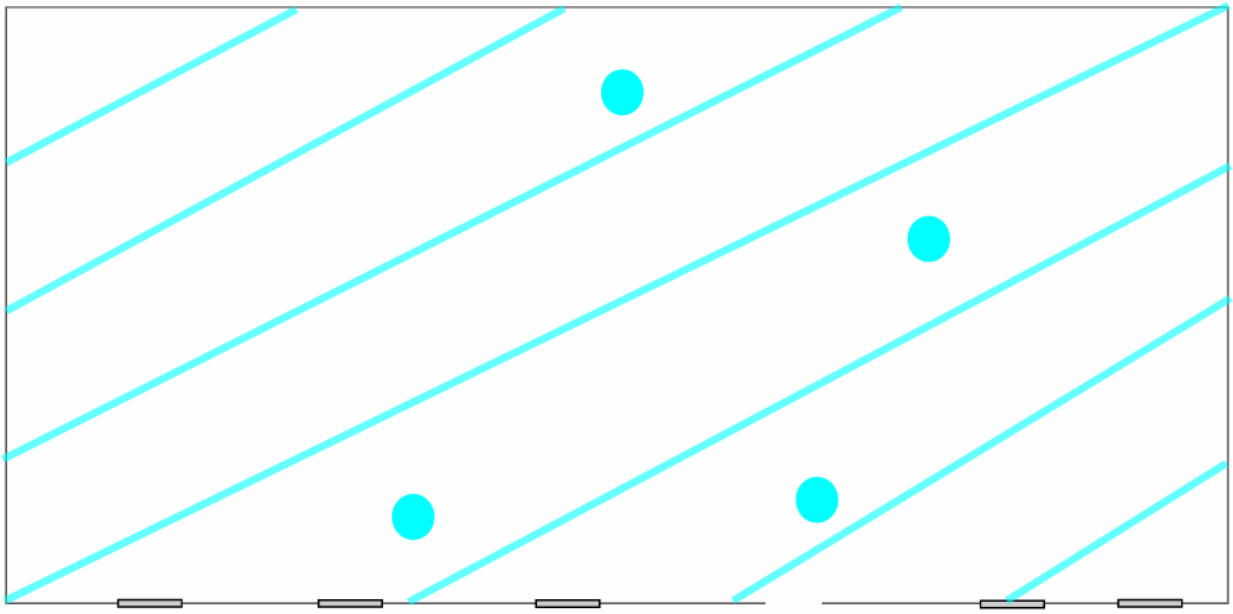
TITLE: Aylor Parks & Open Space - Structure 7 - Livestock Barn - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 228898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

Fibrous Paper on Burner (9-DW1)

Fibrous Paper Debris (9-DW1)

N.T.S.

NORTH

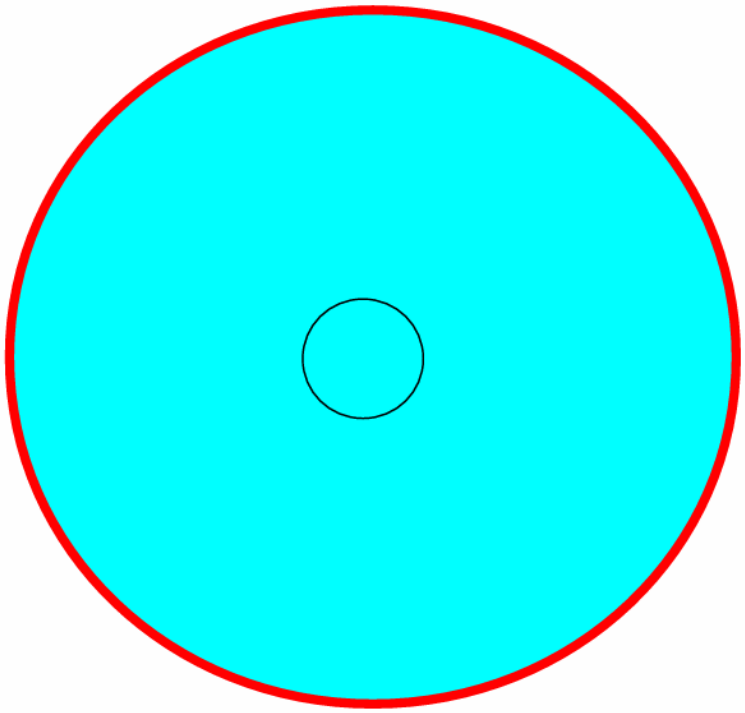
TITLE: Aylor Parks & Open Space - Structure 9 - Feed Shed - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

- Black Granular Tar (10-ASP1)
- Exterior Tar Debris (10-ASP1)

N.T.S.

NORTH

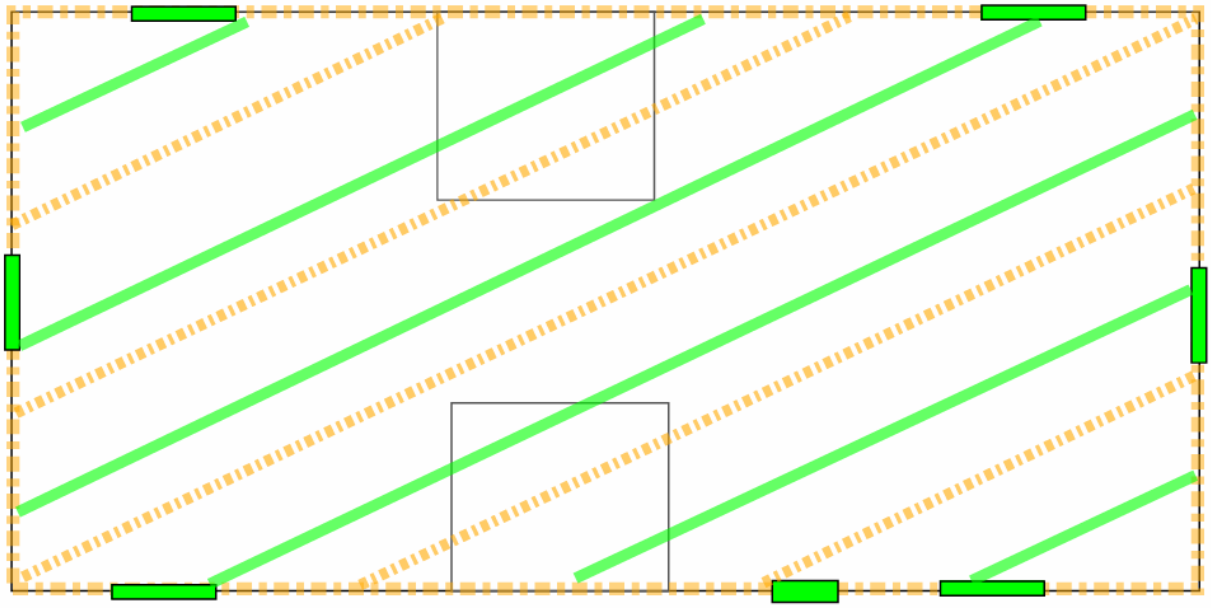
TITLE: Aylor Parks & Open Space - Structure 10 - Grain Silo - Major Spill Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

Window Glazing and Associated Debris (11-WG1)

Exterior Caulking at Metal Seams Walls and Roof (11-ECLK1)

N.T.S.

NORTH

TITLE: Aylor Parks & Open Space - Structure 11 - Mobile Camping Trailer - Major Spill Interior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

NORTH

TITLE: Aylor Parks & Open Space - Major Spill Exterior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

No Exterior Spill

No Exterior Spill

98'

13'

15'

7'

49'

13'

36'

11'

63'

10'

3' Perimeter

3'

3'

3'

3'

11'

7'

4'

57'

16'

244'

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PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 1 – Residence

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

Mr. Chris Lehman and David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the single-family residence detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

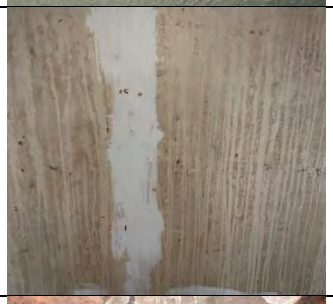
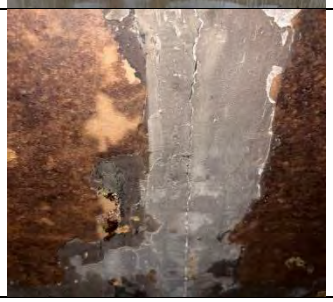
The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The house, is a single-story wood framed constructed home, approximately 1,911 square feet. The structure is comprised of the original house (east portion) with the living room, den and kitchen. There is an addition on the west portion that contains bedrooms, closets, bathrooms and an unfinished partial basement.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Roofing Tar (RT1)	Original Structure – Chimney Flashing, Electrical Pole Flashing and Kitchen Vent Flashing		~6 SF	**YES** – Friable
Cement Board Siding with Wavy Finish (CB1)	Addition Structure – Exterior Siding		~936 SF	**YES** – Will Not Remain Non-Friable During Demolition

ACMs & <1% ACM THAT CAN REMAIN FOR DEMO				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Tar Foundation Sealant (FS1)	Addition Structure – Foundation (sub-grade)		~6 SF	**NO** – Non-Friable
Joint Compound Associated with SM3 (JC3)	Original Structure – Den Area South & West Walls under Wood Paneling and North & East Walls under Wood Paneling and Drywall		~260 SF	**NO** – <1% ACM by Point Count
Off-White Joint Compound and Associated Drywall (CDW2)	Original Structure – Living Room Walls, Exposed and under Wood Paneling		~476 SF	**NO** – <1% ACM by Point Count
Grey Joint Compound and Associated Drywall (CDW3)	Original Structure – Living Room Ceiling under Ceiling Tiles		~280 SF	**NO** – <1% ACM by Point Count

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas, including the attic and the crawlspace.
- The *exterior inspection* included all exterior components, including the foundation below grade.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the

suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		Material Locations Within Scope of Work **See Appendix B for Sample Location Map
INTERIOR		
Homogeneous Area 1 (SM1)	Orange Peel Textured Drywall	· Hallway, stairwell and bedroom & associated closet walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (JC1)	Joint Compound Associated with SM1	
Homogeneous Area 3 (SM2)	Acoustical Textured Drywall	· Hallway, stairwell and bedroom & associated closet ceilings **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (JC2)	Joint Compound Associated with SM2	
Homogeneous Area 5 (SM3)	Bumpy Swirl Textured Drywall	· Den south, east and SE walls, exposed and under paneling/drywall **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 6 (JC3)	**Joint Compound Associated with SM3**	· Den south, east and SE walls, exposed and under paneling/drywall **// 0.75% Asbestos (Point Count)//** **// May Remain for Demo //**
Homogeneous Area 7 (SM4)	Nap Textured Drywall	· Den ceiling **// No Asbestos Detected //** · **// May Remain for Demo //**
Homogeneous Area 8 (JC4)	Joint Compound Associated with SM4	
Homogeneous Area 9 (SM5)	Bumpy Swirl Textured Drywall	· Kitchen walls, under ¼" OSB wood paneling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 10 (JC5)	Joint Compound Associated with SM5	· Kitchen walls, under ¼" OSB wood paneling **// No Asbestos Detected //** **// May Remain for Demo //**

Homogeneous Area 11 (CDW1)	White Joint Compound and Associated Drywall	· Entry foyer walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 12 (CDW2)	**Off-White Joint Compound and Associated Drywall**	· Living room walls, north side under wood paneling **0.25-0.75% Asbestos (Point Count) //** **// May Remain for Demo //**
Homogeneous Area 13 (CDW3)	**Grey Joint Compound and Associated Drywall**	· Living room ceiling, north side under ceiling tiles · Kitchen and pantry ceiling under ceiling tiles **// <0.25% Asbestos (Point Count) //** **// May Remain for Demo //**
Homogeneous Area 14 (CT1)	1' Ceiling Tile with Dot Pattern and Associated Beige Adhesive	· Bathroom ceiling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 15 (CT2)	1' Ceiling Tile with Fissure & Pinhole Pattern and Associated Beige Adhesive	· Bathroom and kitchen ceiling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 16 (CT3)	1' Ceiling Tile with Dot Pattern & Brown Backing and Associated Brown Adhesive	· Living room ceiling **over CDW3** **// No Asbestos Detected //** · **// May Remain for Demo //**
Homogeneous Area 17 (CT4)	1' Ceiling Tile with Dot Pattern & Tan Backing and Associated Brown Adhesive	· Living room ceiling **over CDW3** **// No Asbestos Detected //** · **// May Remain for Demo //**
Homogeneous Area 18 (INS1)	Yellow Fiberglass Insulation with Tar Paper Backing	· Attic throughout addition **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 19 (INS2)	Grey Wool Insulation	· Attic throughout original structure **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 20 (INS3)	White Fiberglass Insulation with Tar Paper Backing	· Throughout wall cavities of addition and basement ceiling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 21 (GYP1)	Unfinished Drywall with Grey Paper Facing	· Den walls, exposed and under wall paneling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 22 (GYP2)	Unfinished Drywall with Brown Paper Facing	· Living room (south side) ceiling under ceiling tiles and wall below wall paneling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 23 (SVF1)	Green/Tan/Grey Sheet Vinyl Flooring with Square Pattern and Tan Adhesive	· Kitchen floor under SVF3 **// No Asbestos Detected //** **// May Remain for Demo //**

Homogeneous Area 24 (SVF2)	Beige Sheet Vinyl Flooring Backing and Biege Adhesive	· Bathroom floor under 2 layers of carpet **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 25 (SVF3)	Green/Tan/Grey Sheet Vinyl Flooring with Black Backing and Biege Adhesive	· Kitchen floor over SVF1 **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 26 (SVF4)	Green/Tan/Grey Sheet Vinyl Flooring with Black Backing and Brown Adhesive	· Entry and living room floor **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 27 (WP1)	White Wall Covering with Rose/Green Flower and Line Design over Wood	· Kitchen walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 28 (WP2)	Red/White/Green Wall Covering with Rose/Plate Design and Associated Gypsum Board	· Pantry walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 29 (WP3)	Grey Wall Covering with Rose/Green Flower and Line Design and Associated Gypsum Board	· Pantry ceiling · Bathroom ceiling and walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 30 (WPA1)	Beige Adhesive Associated with Dark Wood Paneling	· Living room walls **over CDW2** **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 31 (WPA2)	Beige Adhesive Associated with Light Wood Paneling	· Den walls over GYP1 & **SM3/JC3** **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 32 (WPA3)	Brown Adhesive & Black Felt Backing Associated with Yellow & Black Wall Paneling with 4" Tile Pattern	· Bathroom lower 4' of walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 33 (WPA4)	Brown Adhesive Associated with ¼" OSB Wood Paneling	· Kitchen walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 34 (FLU1)	Beige Paper Underlayment	· Den floor under carpet and wood underlayment **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 35 (CP1)	Concrete Patch Material	· Basement foundation cracks, north and west walls **// No Asbestos Detected //** · **// May Remain for Demo //**

EXTERIOR		
Homogeneous Area 36 (BV1)	Tar Impregnated Brick Patterned Siding Shingles with Red Aggregate and Silver Paint	· Siding of original structure (exposed, under drywall and **cement board siding CB1**) **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 37 (FS1)	**Tar Foundation Sealant**	· Exterior concrete foundation of addition **// 7% Asbestos Detected //** **// Non-Friable //** **// May Remain for Demo //**
Homogeneous Area 38 (WG1)	Off-White Window Glazing	· Original structure windows **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 39 (CB1)	**Cement Board Siding with Wavy Finish**	· Exterior siding of original structure **// 7% Asbestos Detected //** **// Non-Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 40 (ECLK1)	White Exterior Caulking	· Exterior window and door frames of original structure **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 41 (ECLK2)	White Exterior Caulking	· Exterior window and door frames of addition **// No Asbestos Detected //** **// May Remain for Demo //**
ROOF		
Homogeneous Area 42 (RCLK1)	Grey Roof Sealant	· Chimney of original structure **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 43 (RM1)	Multi-Layer Shingles with Red & White Aggregate, Felt Paper and Associated Tar	· Roof of original structure **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 44 (RT1)	**Roofing Tar**	· Chimney flashing, electrical pole flashing and kitchen vent flashing of original structure **// 18% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 45 (RM2)	Multi-Layer Shingles with Red & White Aggregate under Shingles with Tan/Brown/Black Aggregate, Felt Paper and Associated Tar	· Roof of addition **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 46 (RT2)	Roofing Tar	· Roof flashing, penetrations and solar panel legs of addition **// No Asbestos Detected //** **// May Remain for Demo //**

10/28/2025 Site Revisit		
Homogeneous Area 47 (TB1)	Fiberboard with Black Tar Backing and Facing	· Addition Exterior Sides under Siding Pannels **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 48 (TP1)	Tar Paper	· Original Construction under Cement Board Siding **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 49 (TAR1)	Black Tar	· Around exterior of house **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 50 (FS2)	Gray Granular Foundation Sealant	· Original Construction Foundation South Side, top seem **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 51 (EBH1)	Electrical Box Harness	· South Side Electoral Box **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Sample Information **See Appendix B for Sample Location Map		Material Information	Asbestos Content
INTERIOR			
HOMOGENEOUS AREA 1	Sample ID: SM1-1 Sample Location: Hallway, north wall Sample ID: SM1-2 Sample Location: NW bedroom, south wall Sample ID: SM1-3 Sample Location: SW bedroom, west wall Sample ID: SM1-4 Sample Location: SE bedroom, east wall Sample ID: SM1-5 Sample Location: NE bedroom, north wall ***See Appendix B for Sample Location Map*	Description: **Orange Peel Textured Drywall** Classification: Surfacing Material Condition: Significantly Damaged Quantity: ~4,216 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: JC1-1 Sample Location: Hallway, north wall Sample ID: JC1-2 Sample Location: NE bedroom, south wall ***See Appendix B for Sample Location Map*	Description: **Joint Compound Associated with SM1** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~4,216 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 3	Sample ID: SM2-1 Sample Location: Hallway ceiling Sample ID: SM2-2 Sample Location: SW bedroom ceiling Sample ID: SM2-3 Sample Location: NE bedroom ceiling ***See Appendix B for Sample Location Map*	Description: **Acoustical Textured Drywall** Classification: Surfacing Material Condition: Significantly Damaged Quantity: ~840 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: JC2-1 Sample Location: SE bedroom ceiling Sample ID: JC2-2 Sample Location: SW bedroom ceiling ***See Appendix B for Sample Location Map*	Description: **Joint Compound Associated with SM2** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~840 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: SM3-1 Sample Location: Den, SE wall Sample ID: SM3-2 Sample Location: Den, east wall Sample ID: SM3-3 Sample Location: Den, south wall ***See Appendix B for Sample Location Map*	Description: **Bumpy Swirl Textured Drywall** Classification: Surfacing Material Condition: Significantly Damaged Quantity: ~660 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 6	Sample ID: JC3-1 Sample Location: Den, SE corner Sample ID: JC3-2 Sample Location: Den, SE wall ***See Appendix B for Sample Location Map*	Description: **Joint Compound Associated with SM3** Classification: Miscellaneous Material Condition: Damaged Quantity: ~260 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	0.75% CHRY
HOMOGENEOUS AREA 7	Sample ID: SM4-1 Sample Location: Den ceiling, SE side Sample ID: SM4-2 Sample Location: Den ceiling, north side Sample ID: SM4-3 Sample Location: Den ceiling, west side ***See Appendix B for Sample Location Map*	Description: **Nap Textured Drywall** Classification: Surfacing Material Condition: Damaged Quantity: ~242 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 8	Sample ID: JC4-1 Sample Location: Den ceiling, center Sample ID: JC4-2 Sample Location: Den ceiling, east side ***See Appendix B for Sample Location Map*	Description: **Joint Compound Associated with SM4** Classification: Miscellaneous Material Condition: Damaged Quantity: ~242 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 9	Sample ID: SM5-1 Sample Location: Kitchen, west wall, north side Sample ID: SM5-2 Sample Location: Kitchen, west wall, south side Sample ID: SM5-3 Sample Location: Kitchen, east wall center ***See Appendix B for Sample Location Map*	Description: **Bumpy Swirl Textured Drywall** Classification: Surfacing Material Condition: Damaged Quantity: ~450 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 10	Sample ID: JC5-1 Sample Location: Kitchen, west wall center Sample ID: JC5-2 Sample Location: Kitchen, east wall center ***See Appendix B for Sample Location Map*	Description: **Joint Compound Associated w/ SM5** Classification: Miscellaneous Material Condition: Damaged Quantity: ~450 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 11	Sample ID: CDW1-1 Sample Location: Entry foyer, south wall Sample ID: CDW1-2 Sample Location: Entry foyer, north wall ***See Appendix B for Sample Location Map*	Description: **White Joint Compound and Associated Drywall** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~260 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 12	Sample ID: CDW2-1 Sample Location: Living room, west wall Sample ID: CDW2-2 Sample Location: Living room, north wall ***See Appendix B for Sample Location Map*	Description: **Off-White Joint Compound and Associated Drywall** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~476 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	0.25-0.75% CHRY

HOMOGENEOUS AREA 13	Sample ID: CDW3-1 Sample Location: Living room ceiling NW side Sample ID: CDW3-2 Sample Location: Kitchen ceiling, NW side ***See Appendix B for Sample Location Map*	Description: **Grey Joint Compound and Associated Drywall** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~870 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	<0.25 CHRY
HOMOGENEOUS AREA 14	Sample ID: CT1-1 Sample Location: Bathroom ceiling, north side Sample ID: CT1-2 Sample Location: Bathroom ceiling center ***See Appendix B for Sample Location Map*	Description: **1' Ceiling Tile with Dot Pattern and Associated Beige Adhesive** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~60 ft^2 Friability: Friable Assessment Category: No	ND
HOMOGENEOUS AREA 15	Sample ID: CT2-1 Sample Location: Kitchen ceiling, north side Sample ID: CT2-2 Sample Location: Kitchen ceiling, SE side ***See Appendix B for Sample Location Map*	Description: **1' Ceiling Tile with Fissure & Pinhole Pattern and Associated Beige Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~169 ft^2 Friability: Friable Assessment Category: No	ND
HOMOGENEOUS AREA 16	Sample ID: CT3-1 Sample Location: Living room ceiling, south side Sample ID: CT3-2 Sample Location: Living room ceiling, SE side ***See Appendix B for Sample Location Map*	Description: **1' Ceiling Tile with Dot Pattern & Brown Backing and Associated Brown Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~102 ft^2 Friability: Friable Assessment Category: No)	ND
HOMOGENEOUS AREA 17	Sample ID: CT4-1 Sample Location: Living room ceiling, NE side Sample ID: CT4-2 Sample Location: Living room ceiling, NW side ***See Appendix B for Sample Location Map*	Description: **1' Ceiling Tile with Dot Pattern & Tan Backing and Associated Brown Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~158 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 18	Sample ID: INS1-1 Sample Location: Attic above SW bedroom Sample ID: INS1-2 Sample Location: Attic above NW bedroom ***See Appendix B for Sample Location Map*	Description: **Yellow Fiberglass Insulation with Tar Paper Backing** Classification: Miscellaneous Material Condition: Good Quantity: ~840 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 19	Sample ID: INS2-1 Sample Location: Attic above Den Sample ID: INS2-2 Sample Location: Attic above east side hallway ***See Appendix B for Sample Location Map*	Description: **Grey Wool Insulation** Classification: Miscellaneous Material Condition: Good Quantity: ~1,071 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 20	Sample ID: INS3-1 Sample Location: Basement ceiling Sample ID: INS3-2 Sample Location: Living room, west wall ***See Appendix B for Sample Location Map*	Description: **White Fiberglass Insulation with Tar Paper Backing** Classification: Miscellaneous Material Condition: Good Quantity: ~4,620 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 21	Sample ID: GYP1-1 Sample Location: Den, north wall Sample ID: GYP1-2 Sample Location: Den, west wall ***See Appendix B for Sample Location Map*	Description: **Unfinished Drywall with Grey Paper Facing** Classification: Miscellaneous Material Condition: Damaged Quantity: ~186 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 22	Sample ID: GYP2-1 Sample Location: Living room, south side ceiling Sample ID: GYP2-2 Sample Location: Living room, south side, south wall ***See Appendix B for Sample Location Map*	Description: **Unfinished Drywall with Brown Paper Facing** Classification: Miscellaneous Material Condition: Damaged Quantity: ~325 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 23	Sample ID: SVF1-1 Sample Location: Kitchen floor, east side Sample ID: SVF1-2 Sample Location: Kitchen floor, west side ***See Appendix B for Sample Location Map*	Description: **Green/Tan/Grey Sheet Vinyl Flooring with Square Pattern and Tan Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~169 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 24	Sample ID: SVF2-1 Sample Location: Bathroom floor, NW side Sample ID: SVF2-2 Sample Location: Bathroom floor, NE side ***See Appendix B for Sample Location Map*	Description: **Beige Sheet Vinyl Flooring Backing and Biege Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~58 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 25	Sample ID: SVF3-1 Sample Location: Kitchen floor, NE side Sample ID: SVF3-2 Sample Location: Kitchen floor, east side ***See Appendix B for Sample Location Map*	Description: **Green/Tan/Grey Sheet Vinyl Flooring with Black Backing and Biege Adhesive** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~169 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 26	Sample ID: SVF4-1 Sample Location: Entry foyer floor Sample ID: SVF4-2 Sample Location: Living room floor ***See Appendix B for Sample Location Map*	Description: **Green/Tan/Grey Sheet Vinyl Flooring with Black Backing and Brown Adhesive** Classification: Miscellaneous Material Condition: Damaged Quantity: ~252 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 27	Sample ID: WP1-1 Sample Location: Kitchen, north wall Sample ID: WP1-2 Sample Location: Kitchen, west wall ***See Appendix B for Sample Location Map*	Description: **White Wall Covering with Rose/Green Flower and Line Design over Wood** Classification: Miscellaneous Material Condition: Damaged Quantity: ~742 ft^2 Friability: Non-Friable Assessment Category	ND

HOMOGENEOUS AREA 28	Sample ID: WP2-1 Sample Location: Pantry, west wall, south side Sample ID: WP2-2 Sample Location: Pantry, west wall, north side ***See Appendix B for Sample Location Map*	Description: **Red/White/Green Wall Covering with Rose/Plate Design and Associated Gypsum Board** Classification: Miscellaneous Material Condition: Damaged Quantity: ~168 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 29	Sample ID: WP3-1 Sample Location: Bathroom, west wall Sample ID: WP3-2 Sample Location: Pantry ceiling ***See Appendix B for Sample Location Map*	Description: **Grey Wall Covering with Rose/Green Flower and Line Design and Associated Gypsum Board** Classification: Miscellaneous Material Condition: Damaged Quantity: ~259 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 30	Sample ID: WPA1-1 Sample Location: Living room, west wall Sample ID: WPA1-2 Sample Location: Living room, north wall ***See Appendix B for Sample Location Map*	Description: **Beige Adhesive Associated with Dark Wood Paneling** Classification: Miscellaneous Material Condition: Damaged Quantity: ~548 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 31	Sample ID: WPA2-1 Sample Location: Den, west wall Sample ID: WPA2-2 Sample Location: Den, north wall ***See Appendix B for Sample Location Map*	Description: **Beige Adhesive Associated with Light Wood Paneling** Classification: Miscellaneous Material Condition: Damaged Quantity: ~182 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 32	Sample ID: WPA3-1 Sample Location: Bathroom, west wall center Sample ID: WPA3-2 Sample Location: Bathroom, west wall, south center ***See Appendix B for Sample Location Map*	Description: **Brown Adhesive & Black Felt Backing Associated with Yellow & Black Wall Paneling with 4" Tile Pattern** Classification: Miscellaneous Material Condition: Damaged Quantity: ~132 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 33	Sample ID: WPA4-1 Sample Location: Bathroom, west wall center Sample ID: WPA4-2 Sample Location: Bathroom, west wall, south center ***See Appendix B for Sample Location Map*	Description: **Brown Adhesive Associated with ¼" OSB Wood Paneling** Classification: Miscellaneous Material Condition: Good Quantity: ~450 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 34	Sample ID: FLU1-1 Sample Location: Den floor, west side Sample ID: FLU1-2 Sample Location: Den floor center ***See Appendix B for Sample Location Map*	Description: **Beige Paper Underlayment** Classification: Miscellaneous Material Condition: Damaged Quantity: ~242 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 35	Sample ID: CP1-1 Sample Location: Basement interior west foundation wall Sample ID: CP1-2 Sample Location: Basement interior north foundation wall ***See Appendix B for Sample Location Map*	Description: **Concrete Patch Material** Classification: Miscellaneous Material Condition: Good Quantity: ~4 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND

EXTERIOR			
HOMOGENEOUS AREA 36	Sample ID: BV1-1 Sample Location: Entry foyer, west wall Sample ID: BV1-2 Sample Location: SE bedroom closet, west wall ***See Appendix B for Sample Location Map*	Description: **Tar Impregnated Brick Patterned Siding Shingles with Red Aggregate and Silver Paint** Classification: Miscellaneous Material Condition: Good Quantity: ~890 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 37	Sample ID: FS1-1 Sample Location: Exterior foundation, south side Sample ID: FS1-2 Sample Location: Exterior foundation, west side ***See Appendix B for Sample Location Map*	Description: **Tar Foundation Sealant** Classification: Miscellaneous Material Condition: Good Quantity: ~1,015 ft^2 Friability: Non-Friable Assessment Category: 5 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	**7% CHRY**
HOMOGENEOUS AREA 38	Sample ID: WG1-1 Sample Location: West window of original structure in SE bedroom closet Sample ID: WG1-2 Sample Location: SE kitchen window ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Damaged Quantity: ~3 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 39	Sample ID: CB1-1 Sample Location: Exterior of original structure, south side Sample ID: CB1-2 Sample Location: Exterior of original structure, east side ***See Appendix B for Sample Location Map*	Description: **Cement Board Siding with Wavy Finish** Classification: Miscellaneous Material Condition: Good Quantity: ~936 ft^2 Friability: Friable Assessment Category: 6 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	**7% CHRY**

HOMOGENEOUS AREA 40	Sample ID: ECLK1-1 Sample Location: Original structure, exterior south side, east window frame Sample ID: ECLK1-2 Sample Location: Original structure, exterior east side, north window frame ***See Appendix B for Sample Location Map*	Description: **White Exterior Caulking** Classification: Miscellaneous Material Condition: Damaged Quantity: ~2 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 41	Sample ID: ECLK1-1 Sample Location: Addition structure, exterior window frame at SE bedroom Sample ID: ECLK1-2 Sample Location: Addition structure, exterior window frame at NW bedroom ***See Appendix B for Sample Location Map*	Description: **White Exterior Caulking** Classification: Miscellaneous Material Condition: Good Quantity: ~4 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
ROOF			
HOMOGENEOUS AREA 42	Sample ID: RCLK1-1 Sample Location: Original structure chimney Sample ID: RCLK1-2 Sample Location: Original structure chimney ***See Appendix B for Sample Location Map*	Description: **Grey Roof Sealant** Classification: Miscellaneous Material Condition: Damaged Quantity: ~3 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 43	Sample ID: RM1-1 Sample Location: Original structure south face Sample ID: RM1-2 Sample Location: Original structure north face ***See Appendix B for Sample Location Map*	Description: **Multi-Layer Shingles with Red & White Aggregate, Felt Paper and Associated Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1,118 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 44	Sample ID: RT1-1 Sample Location: Original structure chimney flashing Sample ID: RT1-2 Sample Location: Original structure kitchen vent flashing ***See Appendix B for Sample Location Map*	Description: **Roofing Tar** Classification: Miscellaneous Material Condition: Damaged Quantity: ~6 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	**18% CHRY**
HOMOGENEOUS AREA 45	Sample ID: RM2-1 Sample Location: Addition roof, south face Sample ID: RM2-2 Sample Location: Addition roof, north face ***See Appendix B for Sample Location Map*	Description: **Multi-Layer Shingles with Red & White Aggregate under Shingles with Tan/Brown/Black Aggregate, Felt Paper and Associated Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~942 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 46	Sample ID: RT2-1 Sample Location: Addition roof, solar panel stand, east side Sample ID: RT2-2 Sample Location: Addition roof, perimeter flashing, east side ***See Appendix B for Sample Location Map*	Description: **Roofing Tar** Classification: Miscellaneous Material Condition: Good Quantity: ~12 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
Site Revisit 10/28/2025			
HOMOGENEOUS AREA 47	Sample ID: TB1-1 Sample Location: Addition: south side Sample ID: TB1-2 Sample Location: Addition: west side ***See Appendix B for Sample Location Map*	Description: **Fiberboard with Black Tar Backing and Facing** Classification: Miscellaneous Material Condition: Good Quantity: ~768 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 48	Sample ID: TP1-1 Sample Location: Original Construction: north side Sample ID: TP1-2 Sample Location: Original Construction: east side ***See Appendix B for Sample Location Map*	Description: **Tar Paper** Classification: Miscellaneous Material Condition: Good Quantity: ~936 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 49	Sample ID: TAR1-1 Sample Location: West Exterior Side on ground Sample ID: TAR1-2 Sample Location: South Exterior Side on ground ***See Appendix B for Sample Location Map*	Description: **Black Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~12 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 50	Sample ID: FS2-1 Sample Location: Original Construction: south side at foundation Sample ID: FS2-2 Sample Location: Original Construction: south side at foundation ***See Appendix B for Sample Location Map*	Description: **Gray Granular Foundation Sealant** Classification: Miscellaneous Material Condition: Good Quantity: ~4 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 51	Sample ID: EBH1-1 Sample Location: South Side Electrical Box Sample ID: EBH1-2 Sample Location: South Side Electrical Box ***See Appendix B for Sample Location Map*	Description: **Electrical Box Harness** Classification: Miscellaneous Material Condition: Good Quantity: ~1 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. <u>TRACE does not mean it contains less than or equal to 1%.</u>

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify both friable and non-friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the house.

- ***Abatement is required to remove 1.) exterior cement board siding on the original structure, 2.) friable roofing tar on the chimney flashing, kitchen vent boot/flashing and electrical pole flashing***

- ***The non-friable tar sealant on the addition structure basement foundation is non-friable and can remain for demo if it remains non-friable throughout the entire demolition process.***

- ***The materials that contain less than 1% asbestos may stay for demolition; however, all activities impacting those materials are regulated by OSHA. Please refer back to Section 4.6 of this report: Materials Containing 1% Asbestos or Less for additional information.***

- ***All the materials found none-detected (ND) may remain for demolition.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are

not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which

the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

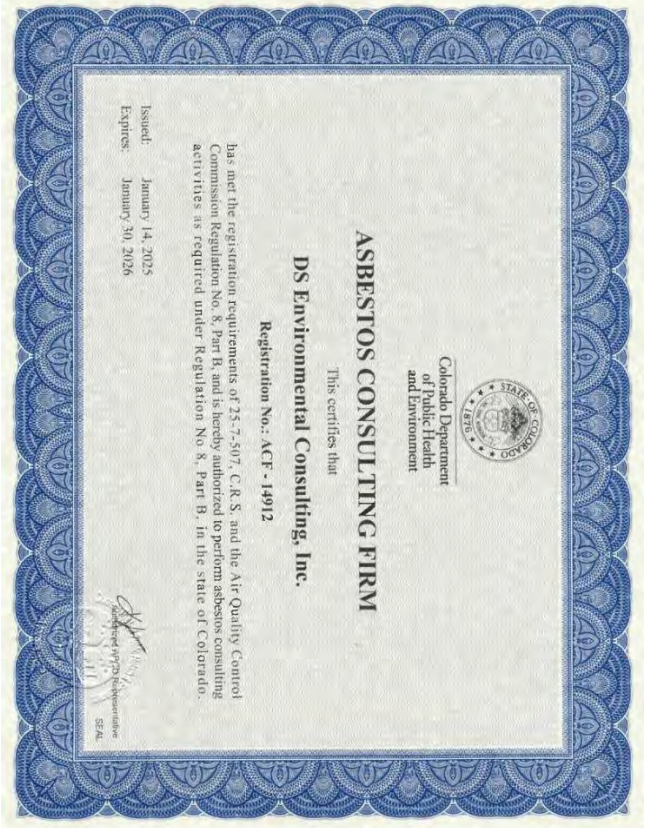
Expires: June 05, 2026

* 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

David Moss Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

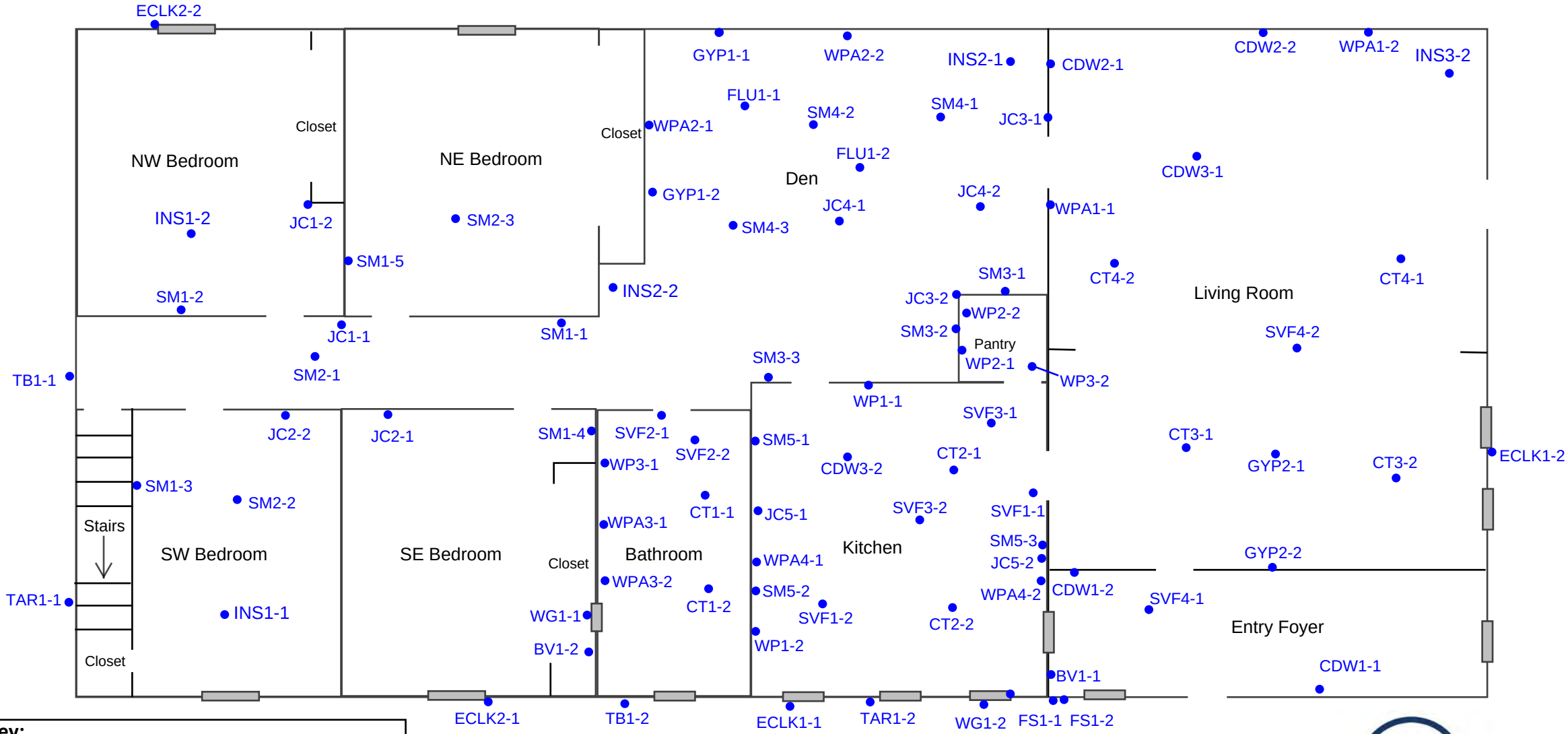
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



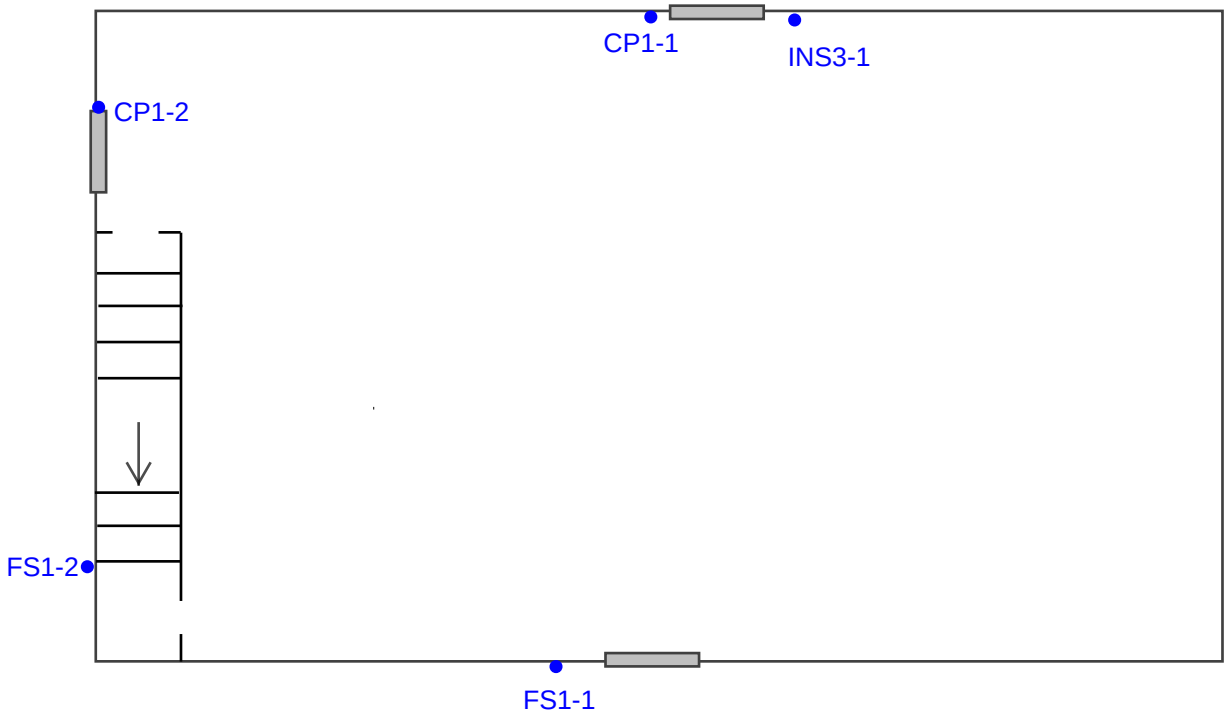
Key:

N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Residence Main Level

DS Environmental CONSULTING



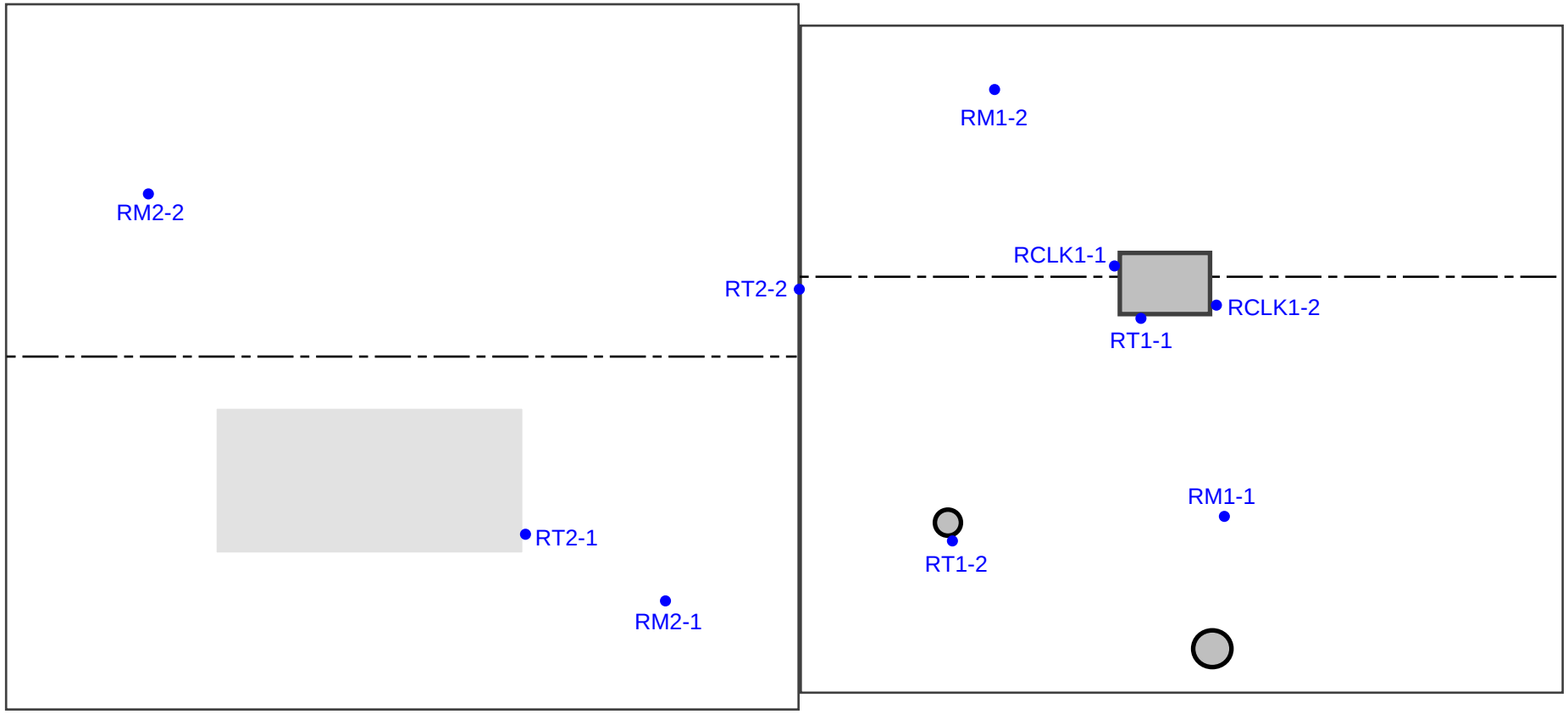
Key:

N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Residence Basement

DS Environmental CONSULTING



Key:

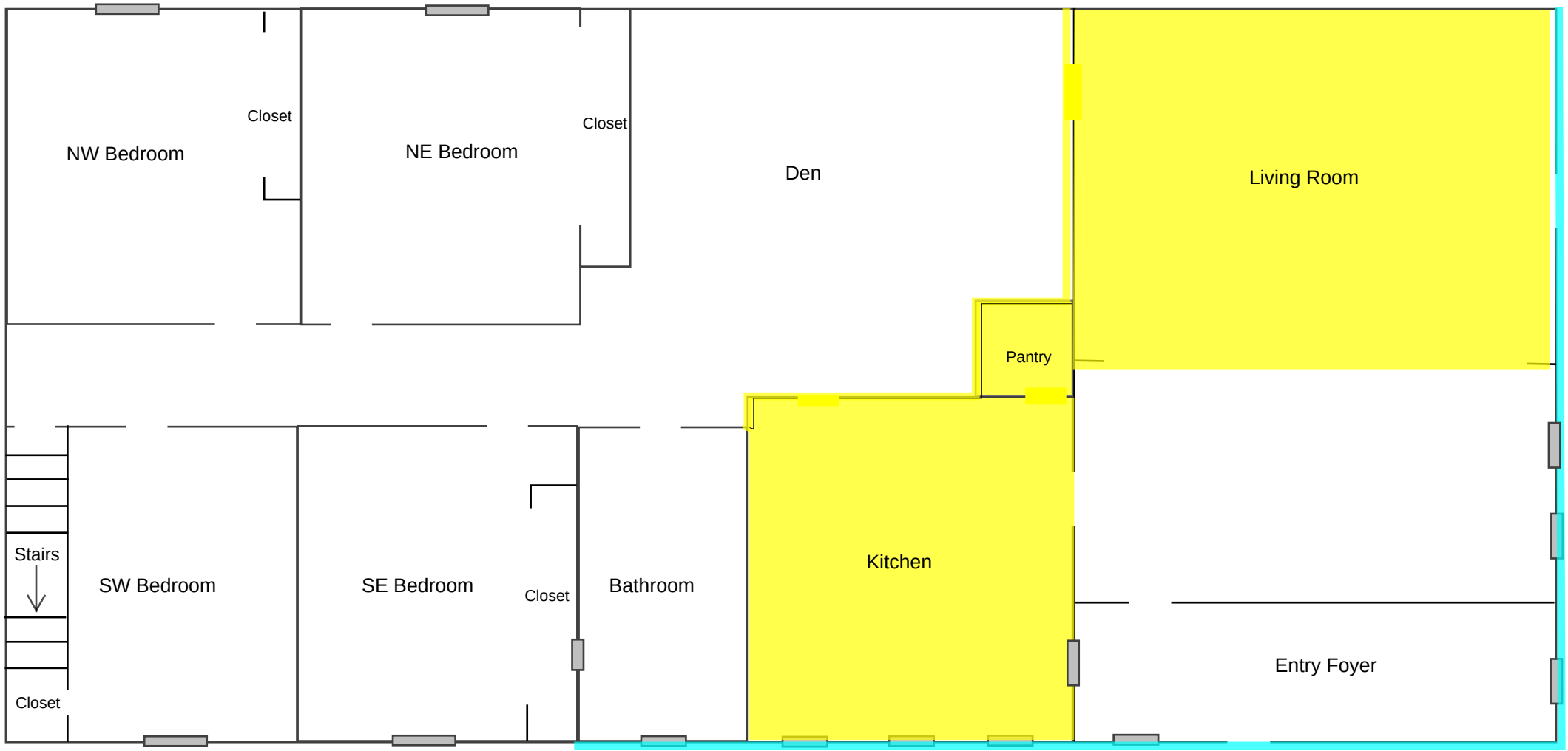
N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Roof

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Cement Board Siding (CB1)

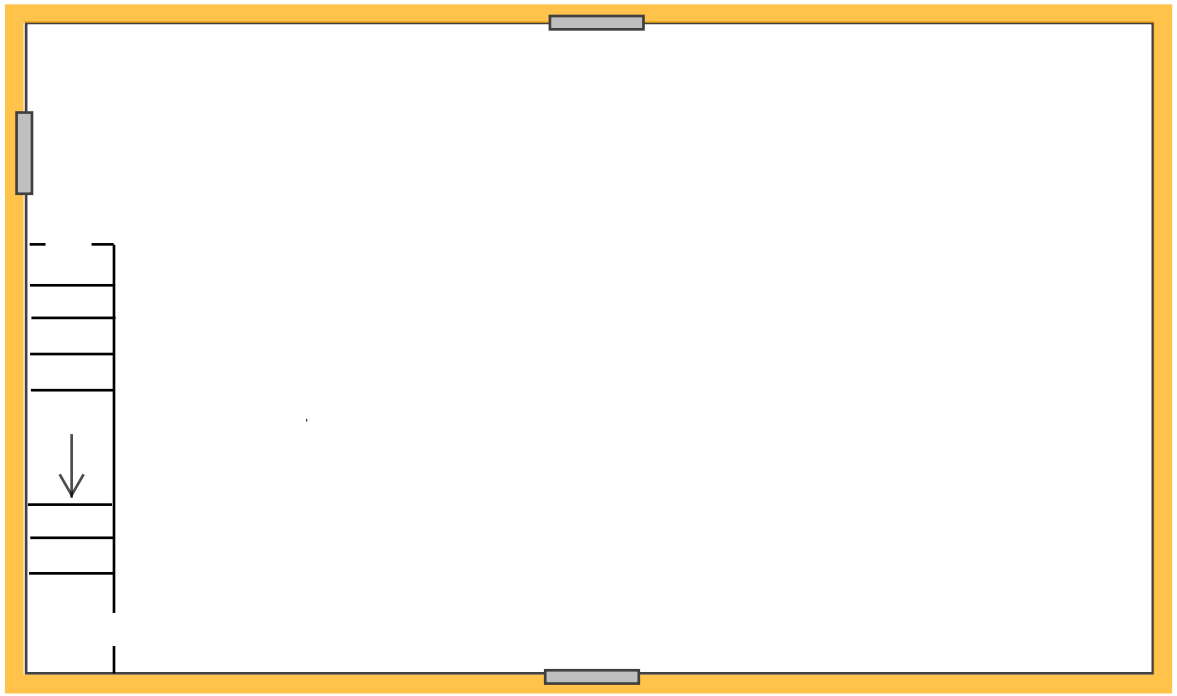
<1% ACM Joint Compound (JC3, CDW2, CDW3)

N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Residence Main Level

DS Environmental CONSULTING



Key:

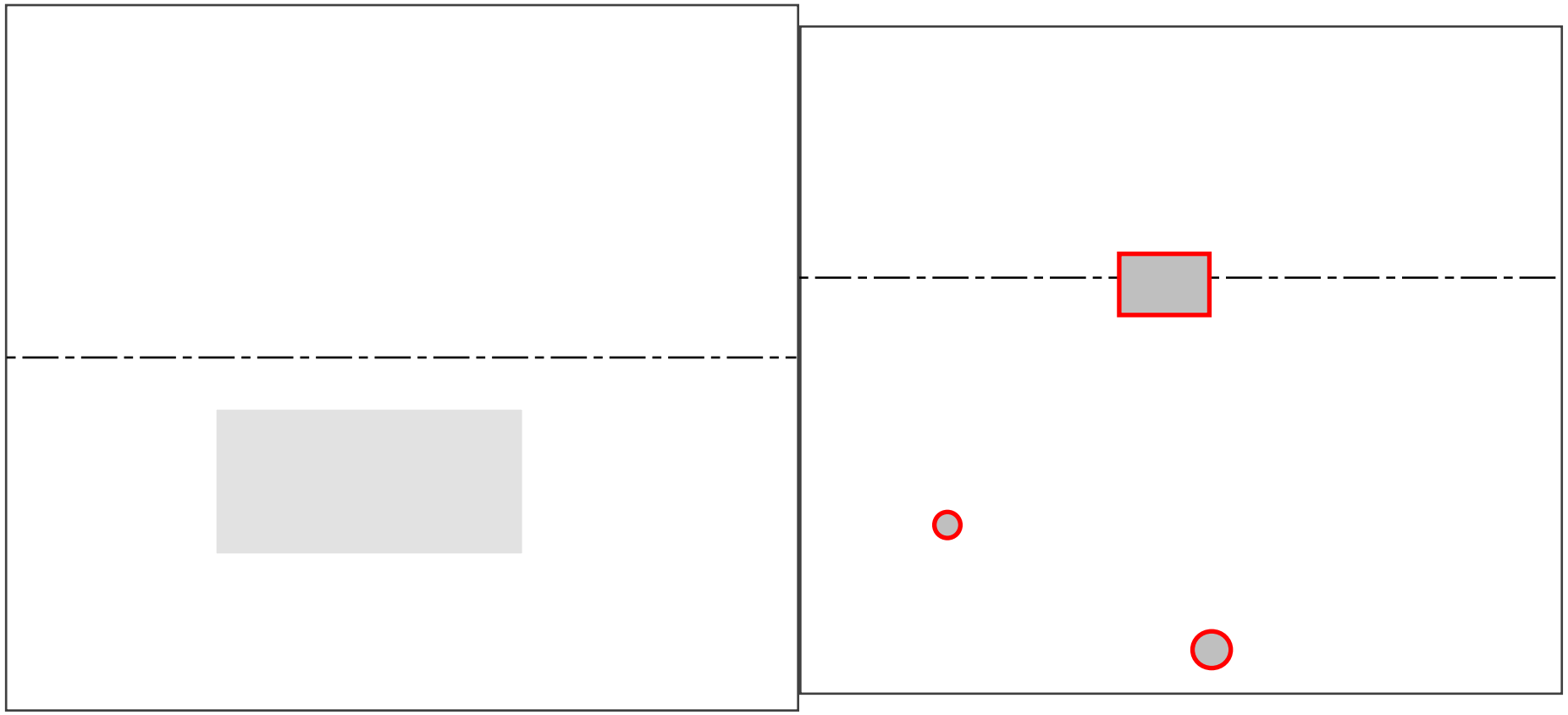
Exterior Foundation Coating (FS1)

N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Residence Basement

DS Environmental CONSULTING



Key:

Roofing Tar (RT1)

N

N.T.S.

Aylor Parks & Open Space - Structure 1 - Roof

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

eurofins | Built Environment Testing Reservoirs

October 28, 2025

Subcontractor Number:
Laboratory Report: **RES 701264-1**
Project #/P.O. #: **None Given**
Project Description: **E 136th Ave, &Quebec St,Thornton,CO-1**

David Moss
DS Environmental Consulting, Inc.
7555 W. 10th Ave. Suite A
Lakewood, CO 80214

Dear David,

Eurofins Reservoirs 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 LAP), Lab ID 101533 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Eurofins Reservoirs 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 701264-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Eurofins Reservoirs 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, as received and with the information provided by the customer. 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 Eurofins Reservoirs. 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
by Camryn Baumgartner

Jeanne Spencer
President

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 701264-1**
Client: **DS Environmental Consulting, Inc.**
Client Project/P.O.: **None Given**
Client Project Description: **E 136th Ave, &Quebec St,Thornton,CO-1**
Date Samples Received: **October 28, 2025**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Priority**
Date Samples Analyzed: **October 28, 2025**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
701264 - Tb1-1	A	Tan fiberboard w/ black tar & pink fibrous debris	100		ND	70	30.0
701264 - Tb1-2	A	Tan fiberboard w/ black tar & pink fibrous debris	100		ND	70	30.0
701264 - Tp1-1	A	Black felt	100		ND	65	35.0
701264 - Tp1-2	A	Black felt	100		ND	65	35.0
701264 - Tar1-1	A	Black/gray fibrous tar	100		ND	15	85.0
701264 - Tar1-2	A	Black/gray fibrous tar	100		ND	20	80.0
701264 - Fs2-1	A	Silver coating	TR		ND	0	100.0
	B	Gray granular cementitious material	100		ND	0	100.0
701264 - Fs2-2	A	Gray paint w/ a trace of silver coating	4		ND	0	100.0
	B	Gray granular cementitious material	96		ND	0	100.0
701264 - Ebh1-1	A	Black resinous material	100		ND	0	100.0
701264 - Ebh1-2	A	Black resinous material	100		ND	0	100.0

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

Nicholas Coscarella
Analyst

eurofins | Built Environment Testing Reservoirs

RES Job #: 701264

SUBMITTED BY		INVOICE TO		CONTACT INFORMATION		SERIES
Company:	DS Environmental Consulting, Inc.	Company:	DS Environmental Consulting, Inc.	Contact:	David Moss	-1 PLM Priority
Address:	7555 W. 10th Ave. Suite A	Address:	7555 W. 10th Ave. Suite A	Phone:	(720) 215-7198	
	Lakewood, CO 80214		Lakewood, CO 80214	Fax:		
				Cell:	(720) 215-7198	
Project Number and/or P.O. #:	None Given	Project Zip Code:		Final Data Deliverable Email Address:		
Project Description/Location:	E 136th Ave, &Quebec St,Thornton,CO-1			david@dsconsultinginc.com (+ 9 ADDNL. CONTACTS)		

ASBESTOS LABORATORY

PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD

CHEMISTRY LABORATORY

Dust RUSH PRIORITY STANDARD

Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT

Organics* SAME DAY RUSH PRIORITY STANDARD

MICROBIOLOGY LABORATORY

Viable Analysis** PRIORITY STANDARD

**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH

Medical Device Analysis RUSH STANDARD

Mold Analysis RUSH PRIORITY STANDARD

****Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.****

Special Instructions:

VALID MATRIX CODES

Air = A	Bulk = B
Dust = D	Food = F
Paint = P	Soil = S
Surface = SU	Swab = SW
Tape = T	Wipe = W
Drinking Water = DW	
Waste Water = WW	
ASTM E1792 approved wipe media only	

LAB NOTES

Laboratory Analysis Instructions

Client Sample ID Number (Sample ID's must be unique)	REQUESTED ANALYSIS: ASBESTOS				CHEMISTRY			MICROBIOLOGY			ICO	Sample Volume (L) / Area	Sample Temperature (°C)	Length(or Aliquots) x Width(or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm
	PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	DUST	METALS	ORGANICS	VIABLES	MEDICAL	MOLD								
1 Tb1-1	X														B			
2 Tb1-2	X														B			
3 Tp1-1	X														B			
4 Tp1-2	X														B			
5 Tar1-1	X														B			
6 Tar1-2	X														B			
7 Fs2-1	X														B			
8 Fs2-2	X														B			
9 Ebh1-1	X														B			
10 Ebh1-2	X														B			

Relinquished By:		David Moss	Date/Time: 10/28/2025 14:20:29	Sample Condition: Acceptable
Received By:		Dylan Polier	Date/Time: 10/28/2025 14:26:40	Carrier: Hand

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
SM1-1	22029658-1A	10	White Texture with Yellow/White Paint	ND			100	C	N
	22029658-1B	90	Off-White/Tan Drywall	ND		25 CELL	75	G	N
SM1-2	22029658-2A	35	White Texture with Black/White Paint	ND			100	C	N
	22029658-2B	65	Tan/Off-White Drywall	ND		75 CELL	25	G	N
SM1-3	22029658-3A	10	White Texture with White Paint	ND			100	C	N
	22029658-3B	90	Off-White/Tan Drywall	ND		15 CELL	85	G	N
SM1-4	22029658-4A	35	White Texture with White Paint	ND			100	C	N
	22029658-4B	65	Tan/Off-White Drywall	ND		75 CELL	25	G	N
SM1-5	22029658-5A	12	White Texture with White Paint	ND			100	C	N
	22029658-5B	88	Off-White/Tan Drywall	ND		15 CELL	85	G	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
JC1-1	22029658-6A	8	White Texture with White Paint	ND			100	C	N
	22029658-6B	5	White Tape	ND		95 CELL	5		N
	22029658-6C	6	White Joint Compound	ND			100	C	Y
	22029658-6D	81	Off-White/Tan Drywall	ND		15 CELL	85	G	N
JC1-2	22029658-7A	20	White Texture with White Paint	ND			100	C	N
	22029658-7B	80	Off-White/Tan Drywall	ND		15 CELL	85	G	N
SM2-1	22029658-8A	20	White Foamy Texture	ND		3 FG	97	C	N
	22029658-8B	80	Off-White/Tan Drywall	ND		25 CELL	75	G	N
SM2-2	22029658-9A	25	White Foamy Texture	ND		3 FG	97	C	N
	22029658-9B	35	White Compound	ND			100	C	Y

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
SM2-2	22029658-9C	40	Tan Paper	ND		95 CELL	5		N
SM2-3	22029658-10A	40	White Foamy Texture	ND		3 FG	97	C	N
	22029658-10B	60	Off-White/Tan Drywall	ND		20 CELL	80	G	N
JC2-1	22029658-11A	8	White Foamy Texture with White Paint	ND		3 FG	97	C	N
	22029658-11B	4	White Tape	ND		95 CELL	5		N
	22029658-11C	3	White Joint Compound	ND			100	C	Y
	22029658-11D	85	Off-White/Tan Drywall	ND		15 CELL	85	G	N
JC2-2	22029658-12A	8	White Foamy Texture with White Paint	ND		3 FG	97	C	N
	22029658-12B	5	White Tape	ND		95 CELL	5		N
	22029658-12C	7	White Joint Compound	ND			100	C	Y

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
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NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

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Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
JC2-2	22029658-12D	80	Off-White/Tan Drywall	ND		15 CELL	85	G	N
SM3-1	22029658-13A	20	Green Paint with Green Granular Texture	ND			100	Q,C	N
	22029658-13B	45	Tan/Multicolored Multilayered Wall Covering	ND		90 CELL	10		N
	22029658-13C	35	White/Brown Drywall	ND		85 CELL	15	G	N
SM3-2	22029658-14A	40	Green Paint with Green Granular Texture	ND			100	Q,C	N
	22029658-14B	40	Tan/Multicolored Multilayered Wall Covering	ND		90 CELL	10		N
	22029658-14C	20	Brown Paper	ND		95 CELL	5		N
SM3-3	22029658-15A	30	Green/Multicolored Paint with Green Granular Texture	ND			100	Q,C	N
	22029658-15B	50	Tan/Multicolored Multilayered Wall Covering	ND		90 CELL	10		N
	22029658-15C	20	White/Brown Drywall	ND		85 CELL	15	G	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

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AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
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NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
JC3-1	22029658-16A	20	Green/Multicolored Paint with Green Granular Texture	ND			100	Q,C	N
	22029658-16B	60	Tan/Multicolored Multilayered Wall Covering	ND		90 CELL	10		N
	22029658-16C	20	White/Brown Drywall	ND		85 CELL	15	G	N
JC3-2	22029658-17A	5	Green Paint with Green Granular Texture	ND			100	Q,C	N
	22029658-17B	3	Tan/Multicolored Wall Covering	ND		90 CELL	10		N
	22029658-17C	5	Off-White Woven Material	ND		98 CELL	2		N
	22029658-17D	**1**	**Tan Paper**	**CHRY**	**2**	**93 CELL**	**5**		**N**
	22029658-17E	86	White/Brown Drywall	ND		20 CELL	80	G	N
SM4-1	22029658-18	100	White/Brown Drywall with White Paint	ND		75 CELL	25	G	N
SM4-2	22029658-19	100	White/Brown Drywall with White Paint	ND		75 CELL	25	G	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

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NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
SM4-3	22029658-20	100	White/Brown Drywall with Silver/White Paint	ND		80 CELL	20	G	N
JC4-1	22029658-21A	3	White Paint with White Woven Tape	ND		70 FG	30		N
	22029658-21B	97	White/Brown Drywall	ND		20 CELL	80	G	N
JC4-2	22029658-22A	3	White Paint with White Woven Tape	ND		70 FG	30		N
	22029658-22B	97	White/Brown Drywall	ND		20 CELL	80	G	N
CDW1-1	22029658-23A	2	White Paint with White Compound	ND			100	C	N
	22029658-23B	98	White/Brown Drywall	ND		20 CELL	80	G	N
CDW1-2	22029658-24	100	White/Brown Drywall with Red/White Paint	ND		20 CELL	80	G	N
CDW2-1	**22029658-25A**	**1**	**Off-White Texture**	**CHRY**	**Tr**		**100**	**C**	**Y**
	22029658-25B	99	White/Brown Drywall with Off-White Paint	ND		15 CELL	85	G	N

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City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

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Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
CDW2-2	**22029658-26A**	**3**	**Light Gray/White Texture**	**CHRY**	**2**		**98**	**C**	**Y**
	22029658-26B	97	White/Brown Drywall with Off-White Paint	ND		15 CELL	85	G	N
CDW3-1	22029658-27A	Tr	Yellow Resinous Material	ND			100		N
	22029658-27B	**3**	**Black/Brown Compound**	**CHRY**	**Tr**		**100**	**C**	**Y**
	22029658-27C	97	White/Brown Drywall with Black/Gray Paint	ND		15 CELL	85	G	N
CDW3-2	**22029658-28A**	**4**	**Gray/White Compound**	**CHRY**	**Tr**		**100**	**C**	**Y**
	22029658-28B	96	White/Brown Drywall with Off-White Paint	ND		15 CELL	85	G	N
CT1-1	22029658-29A	5	Off-White/Silver Paint with Off-White Resinous Material	ND			100		N
	22029658-29B	95	Tan Fiberboard	ND		95 CELL	5		N
CT1-2	22029658-30A	5	Pink/Silver Paint with Off-White Resinous Material	ND			100		N

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Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
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Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
CT1-2	22029658-30B	95	Tan Fiberboard	ND		95 CELL	5		N
CT2-1	22029658-31A	40	White/Gray Perlitic Ceiling Tile	ND		75 CELL,MW	25	P	N
	22029658-31B	55	Yellow Mastic	ND			100		N
	22029658-31C	5	Brown Paper	ND		95 CELL	5		N
CT2-2	22029658-32A	93	White/Gray Perlitic Ceiling Tile	ND		75 CELL,MW	25	P	N
	22029658-32B	5	Yellow Mastic	ND			100		N
	22029658-32C	2	Brown Paper with Gray Paint	ND		95 CELL	5		N
CT3-1	22029658-33A	30	Brown Fibrous Material	ND		99 CELL	1		Y
	22029658-33B	40	Brown Mastic	ND		1 TL	99	B	Y
	22029658-33C	30	White/Tan Drywall	ND		10 CELL	90	G	N

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Client	Lab Sample Number								
CT3-2	22029658-34A	20	Brown Fibrous Material	ND		99 CELL	1		Y
	22029658-34B	60	Brown Mastic	ND		1 TL	99	B	Y
	22029658-34C	20	White/Tan Drywall	ND		10 CELL	90	G	N
INS1-1	22029658-35A	80	Brown Fibrous Material	ND		99 CELL	1		Y
	22029658-35B	20	Pink Insulation	ND		99 FG	1		Y
INS1-2	22029658-36A	90	Black Tar Paper	ND		50 CELL	50	T	N
	22029658-36B	10	Pink Insulation	ND		99 FG	1		Y
INS2-1	22029658-37	100	Black Insulation	ND		95 FG	5		Y
INS2-2	22029658-38	100	Black/White Insulation	ND		98 FG	2		N
INS3-1	22029658-39A	95	Black Tar Paper	ND		50 CELL	50	T	N

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Client	Lab Sample Number								
INS3-1	22029658-39B	5	White Insulation	ND		99 FG	1		Y
INS3-2	22029658-40A	80	Black Tar Paper	ND		50 CELL	50	T	N
	22029658-40B	20	White Insulation	ND		99 FG	1		Y
GYP1-1	22029658-41	100	White/Tan Drywall	ND		10 CELL	90	G	N
GYP1-2	22029658-42	100	White/Tan Drywall	ND		10 CELL	90	G	N
CT4-1	22029658-43A	3	Silver Paint	ND			100		Y
	22029658-43B	3	Brown Fibrous Material	ND		99 CELL	1		Y
	22029658-43C	10	Brown Mastic	ND			100	B	Y
	22029658-43D	84	Brown Fibrous Material	ND		99 CELL	1		Y
CT4-2	22029658-44A	1	Brown Fibrous Material	ND		99 CELL	1	B	Y

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CT4-2	22029658-44B	20	Yellow Mastic	ND			100		Y
	22029658-44C	79	Brown Fibrous Material	ND		99 CELL	1		Y
SVF1-1	22029658-45A	92	Brown Sheet Vinyl with Tan Fibrous Backing	ND		20 CELL,FG	80	C,B	N
	22029658-45B	8	Tan Mastic	ND			100	B	Y
SVF1-2	22029658-46A	93	Brown Sheet Vinyl with Tan Fibrous Backing	ND		20 CELL,FG	80	C,B	N
	22029658-46B	7	Tan Mastic	ND			100	B	Y
SVF2-1	22029658-47A	Tr	Off-White Resinous Material	ND			100	C,B	Y
	22029658-47B	85	Brown Fibrous Material	ND		95 CELL	5		N
	22029658-47C	15	Tan Wood	ND		100 CELL			N
SVF2-2	22029658-48A	93	Brown Fibrous Material	ND		95 CELL	5		N

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Client	Lab Sample Number								
SVF2-2	22029658-48B	7	Tan Wood	ND		100 CELL			N
SVF3-1	22029658-49	100	Green Sheet Vinyl with Black Fibrous Backing	ND		40 CELL	60	C,B,T	N
SVF3-2	22029658-50A	1	Brown Fibrous Material with Off-White Resinous Material	ND		80 CELL	20	B	N
	22029658-50B	99	Green Sheet Vinyl with Black Fibrous Backing	ND		40 CELL	60	C,B,T	N
SVF4-1	22029658-51A	40	Tan Fibrous Material with Brown Resinous Material	ND		80 CELL	20	B	N
	22029658-51B	60	Brown Sheet Vinyl with Black Fibrous Backing	ND		40 CELL	60	C,B,T	N
SVF4-2	22029658-52A	55	Tan Sheet Vinyl with Black Fibrous Backing	ND		40 CELL	60	C,B,T	N
	22029658-52B	45	Tan Fibrous Material with Brown Resinous Material	ND		80 CELL	20	B	N
WP1-1	22029658-53A	15	Gray/White Wallpaper	ND		75 CELL	25		N
	22029658-53B	85	Tan Wood	ND		100 CELL			N

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Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
WP1-2	22029658-54A	20	Gray/White Wallpaper with Red Paint	ND		75 CELL	25		N
	22029658-54B	80	Tan Wood	ND		100 CELL			N
WP2-1	22029658-55A	10	Gray/Tan Wallpaper	ND		80 CELL	20		N
	22029658-55B	15	Red/Tan Wallpaper	ND		80 CELL	20		N
	22029658-55C	75	Brown/White Drywall	ND		70 CELL	30	G	N
WP2-2	22029658-56A	10	Off-White/Multicolored Wallpaper	ND		80 CELL	20		N
	22029658-56B	20	Red/Tan Wallpaper	ND		80 CELL	20		N
	22029658-56C	70	Brown/White Drywall	ND		75 CELL	25	G	N
WP3-1	22029658-57A	35	Tan/Pink Wallpaper	ND		85 CELL	15		N
	22029658-57B	65	Tan/Pink Drywall	ND		75 CELL	25	G	N

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Client	Lab Sample Number								
WP3-2	22029658-58A	40	Beige/Tan Wallpaper	ND		85 CELL	15		N
	22029658-58B	60	Tan/White Drywall	ND		90 CELL	10	G	N
WPA1-1	22029658-59A	60	Tan Mastic	ND			100	B	Y
	22029658-59B	40	Tan Paper with Beige/Off-White Paint	ND		80 CELL	20		N
WPA1-2	22029658-60A	50	Tan Mastic	ND			100	B	Y
	22029658-60B	50	Tan Paper with Beige/Off-White Paint	ND		80 CELL	20		N
WPA2-1	22029658-61A	55	Cream Mastic	ND			100		Y
	22029658-61B	45	Tan/White Drywall	ND		65 CELL	35	G	N
WPA2-2	22029658-62A	12	Cream Mastic	ND			100		Y
	22029658-62B	88	White/Tan Drywall	ND		10 CELL	90	G	N

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AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
FLU1-1	22029658-63	100	Tan Fibrous Material	ND		95 CELL	5		Y
FLU1-2	22029658-64	100	Tan Fibrous Material	ND		95 CELL	5		Y
CP1-1	22029658-65	100	Gray Granular Material	ND			100	Q	N
CP1-2	22029658-66	100	Gray Granular Material	ND			100	Q	N
BV1-1	22029658-67A	5	Silver Resinous Material	ND			100	T	Y
	22029658-67B	65	Black Tar with Red Granular Material	ND			100	T,Q	N
	22029658-67C	10	Black Fibrous Material	ND		80 CELL	20	T	N
	22029658-67D	20	Tan Fibrous Material	ND		95 CELL	5		Y
BV1-2	22029658-68A	4	Silver Resinous Material	ND			100	T	Y
	22029658-68B	71	Black Tar with Red Granular Material	ND			100	T,Q	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

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Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
BV1-2	22029658-68C	10	Black Fibrous Material	ND		80 CELL	20	T	N
	22029658-68D	15	Tan Fibrous Material	ND		95 CELL	5		Y
FS1-1	**22029658-69A**	**90**	**Black Tar**	**CHRY**	**7**		**93**	**T**	**Y**
	22029658-69B	10	Gray Granular Plaster	ND			100	Q	Y
FS1-2	22029658-70		POSITIVE STOP						
WG1-1	22029658-71	100	White Glazing	ND		5 TL	95	C	Y
WG1-2	22029658-72	100	White Glazing with Brown Paint	ND			100	C	N
CB1-1	**22029658-73**	**100**	**Gray Cement Asbestos Board with Gray Paint**	**CHRY**	**7**		**93**	**C**	**N**
CB1-2	22029658-74		POSITIVE STOP						
RCLK1-1	22029658-75A	97	White Resinous Material	ND			100	B	Y

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Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
RCLK1-1	22029658-75B	3	Multicolored Rock Fragments	ND			100	Q	Y
RCLK1-2	22029658-76A	90	White Resinous Material	ND			100	B	Y
	22029658-76B	10	Multicolored Rock Fragments	ND			100	Q	Y
RM1-1	22029658-77A	77	Red/White Shingle	ND		20 FG	80	Q,T	N
	22029658-77B	10	Black Tar	ND			100	T	Y
	22029658-77C	5	Black Fibrous Material	ND		95 CELL	5	T	Y
	22029658-77D	5	Black Tar	ND			100	T	Y
	22029658-77E	3	Brown Wood	ND		99 CELL	1		Y
RM1-2	22029658-78A	25	Red/White Shingle	ND		40 CELL	60	Q,T	N
	22029658-78B	25	Red Shingle	ND		25 CELL	75	Q,T	N

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Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
RM1-2	22029658-78C	30	Black Tar	ND			100	T	Y
	22029658-78D	20	Black Fibrous Material	ND		99 CELL	1	T	Y
RT1-1	**22029658-79**	**100**	**Black Fibrous Tar**	**CHRY**	**18**		**82**	**T**	**Y**
RT1-2	22029658-80		POSITIVE STOP						
RM2-1	22029658-81A	30	Brown/Multicolored Shingle	ND		25 FG	75	Q,T	N
	22029658-81B	25	Red/Multicolored Shingle	ND		20 CELL	80	Q,T	N
	22029658-81C	40	Brown Felt	ND		60 CELL	40	T	N
	22029658-81D	5	Black Tar	ND			100	T	Y
RM2-2	22029658-82A	32	Gray/Multicolored Shingle	ND		25 FG	75	Q,T	N
	22029658-82B	40	Red/Multicolored Shingle	ND		20 CELL	80	Q,T	N

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Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
RM2-2	22029658-82C	28	Brown Felt	ND		60 CELL	40	T	N
RT2-1	22029658-83	100	Black Tar with Black Fibrous Tar	ND		15 CELL,FG	85	T,C	N
RT2-2	22029658-84	100	Black Tar with Black Fibrous Tar	ND		15 CELL,FG	85	T,C	N
ECLK1-1	22029658-85	100	White Caulk with White/Dark Red Paint	ND			100	B,C	N
ECLK1-2	22029658-86	100	White Caulk with White/Dark Red Paint	ND			100	B,C	N
WPA3-1	22029658-87A	15	Black Felt with Orange Resinous Material	ND		60 CELL	40	T	N
	22029658-87B	3	Brown Resinous Material	ND			100	B	Y
	22029658-87C	5	Brown Mastic	ND			100	B	Y
	22029658-87D	77	Pink/Tan Drywall	ND		20 CELL	80	G	N
WPA3-2	22029658-88A	15	Black Felt with Orange Resinous Material	ND		60 CELL	40	T	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

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Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
WPA3-2	22029658-88B	3	Brown Resinous Material	ND			100	B	Y
	22029658-88C	3	Brown Mastic	ND			100	B	Y
	22029658-88D	79	Pink/Tan Drywall	ND		20 CELL	80	G	N

Thomas Harbour
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

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Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	NVLAP Lab Code 200860-0	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/4/2022
Attn:	Chris Lehman		Date Reported:	8/4/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.		Project ID:	22029658

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

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- Any reproduction of this document must include the entire document in order for the report to be valid.

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Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/15/2022
Attn:	Chris Lehman	Date Reported:	8/15/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.	Project ID:	22029658

Test Requested: **3001, Asbestos Point Count in Bulk Samples (400/1000)**
Method: EPA/600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials; EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

Sample Identification		Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Point Count Method (400/1000)
Client	Lab Sample Number				
JC3-2	**22029658-17D**	**Tan Paper**	**CHRY**	**0.75**	**400**
CDW2-1	**22029658-25A**	**Off-White Texture**	**CHRY**	**0.25**	**400**
CDW2-2	**22029658-26A**	**Light Gray/White Texture**	**CHRY**	**0.75**	**400**
CDW3-1	**22029658-27B**	**Black/Brown Compound**	**CHRY**	**<0.25**	**400**
CDW3-2	**22029658-28A**	**Gray/White Compound**	**CHRY**	**<0.25**	**400**

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Laboratory Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite

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Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	NVLAP Lab Code 200860-0	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/15/2022
Attn:	Chris Lehman		Date Reported:	8/15/2022
Client Project Name:	Structure 1 - Aylor Property / NW Corner of 136th & Quebec St.		Project ID:	22029658

Test Requested: **3001, Asbestos Point Count in Bulk Samples (400/1000)**
Method: EPA/600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials; EPA-600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
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Client Name	DS Environmental Consulting	Date Collected:	6/14/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/14/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/19/2024
Attn:	Chris Lehman	Date Reported:	6/21/2024
Client Project Name:	Aylor Property / E. 136th & N. Quebec St., Thornton, CO	Project ID:	24021844

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
SM5-1	24021844-1	100	Off-White/Yellow Granular Texture Paint	ND			100	Q,B	N
SM5-2	24021844-2	100	Off-White/Yellow Granular Texture Paint	ND			100	Q,B	N
SM5-3	24021844-3	100	Off-White/Yellow Granular Texture Paint	ND			100	Q,B	N
JC5-1	24021844-4A	10	Off-White Mesh	ND		100 CELL			Y
	24021844-4B	5	Off-White Mastic	ND			100	B	Y
	24021844-4C	8	Tan Multilayered Wallpaper	ND		85 CELL	15	B	N
	24021844-4D	77	Pink/Tan Drywall	ND		10 CELL	90	G	N
JC5-2	24021844-5A	10	Off-White Mesh	ND		100 CELL			Y
	24021844-5B	5	Off-White Mastic	ND			100	B	Y
	24021844-5C	10	Tan Multilayered Wallpaper	ND		85 CELL	15	B	N

Anita Grigg
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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A Pace Analytical® Laboratory

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Golden, CO, 80401
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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	6/14/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/14/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/19/2024
Attn:	Chris Lehman	Date Reported:	6/21/2024
Client Project Name:	Aylor Property / E. 136th & N. Quebec St., Thornton, CO	Project ID:	24021844

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
JC5-2	24021844-5D	75	Pink/Tan Drywall	ND		10 CELL	90	G	N
GYP2-1	24021844-6	100	White/Tan Drywall	ND		10 CELL	90	G	N
GYP2-2	24021844-7	100	White/Tan Drywall	ND		10 CELL	90	G	N
WPA4-1	24021844-8A	5	Tan/Brown Mastic	ND			100	B	Y
	24021844-8B	95	Pink/Tan Drywall	ND		20 CELL	80	G	N
WPA4-2	24021844-9A	4	Tan/Brown Mastic	ND			100	B	Y
	24021844-9B	96	Pink/Tan Drywall	ND		10 CELL	90	G	N
ECLK2-1	24021844-10A	65	Gray Caulk with Gray/White Paint	ND			100	C,B	N
	24021844-10B	35	Tan Fibrous Material	ND		100 CELL			Y
ECLK2-2	24021844-11A	75	Gray Caulk with Gray/White Paint	ND			100	C,B	N

Anita Grigg
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite

Q = Quartz
T = Tar
V = Vermiculite

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NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	6/14/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/14/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/19/2024
Attn:	Chris Lehman	Date Reported:	6/21/2024
Client Project Name:	Aylor Property / E. 136th & N. Quebec St., Thornton, CO	Project ID:	24021844

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
ECLK2-2	24021844-11B	25	Tan Fibrous Material	ND		100 CELL			Y

Anita Grigg
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Client Name	DS Environmental Consulting		Date Collected: 6/14/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 6/14/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/19/2024
Attn:	Chris Lehman		Date Reported: 6/21/2024
Client Project Name:	Aylor Property / E. 136th & N. Quebec St., Thornton, CO		Project ID: 24021844

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be performed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distinguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

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AZ, CA, CO, FL, GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave., Lakewood CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine [X] / 24 Hour [ ] / Same Day [ ] / 4 Hour [ ] / 2 Hour [ ]	
SAMPLING LOCATION ZIP CODE	

RT TAT per Chris 7/28/22

Collected By/Date:	Relinquished By/Date:
Relinquished By/Date:	Received By/Date: AM 7/28/22 12:18p
Sampler Type	Andersen [ ] SAS [ ] SampleAire [ ] AeroTrap [ ] Other ___ BioCulture [ ]
PO#/Job#:	
Project Name:	Structure 1 - Aylor Property -
Notes:	NW Corner of 136th & Quebec St.
CC Info:	Run Samples Progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	SM1.1	3002	set	
2	1.2	↓		
3	1.3	↓		
4	1.4	↓		
5	1.5	↓		
6	JC 1-1	↓	set	
7	1.2	↓		
8	SM2.1	↓	set	
9	2.2	↓		
10	2.3	↓		
11	JC2.1	↓	set	
12	2-2	↓		
13	SM3-1	↓	set	
14	3-2	↓		
15	3-3	↓		

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY

A: ⊖ TH 1-12 45-56 ✓ AS ✓ 13-32 PK ⊖ 33-44 ✓ 69-78 ⊕ PCM ⊖ 57-68 ERT ✓ 79-88 8/4/22 ⊕

V: ______

Q: AW 8/4/2022

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AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
16	TC3-1	3002	} set	
17	↓ 3-2	↓		
18	SM4-1		} set	
19	↓ 4-2			
20	↓ 4-3			
21	TC4-1		} set	
22	↓ 4-2			
23	CDW1-1		} set	
24	↓ 1-2			
25	CDW2-1		} set	
26	↓ 2-2			
27	CDW3-1		} set	
28	↓ 3-2			
29	CT1-1		} set	
30	↓ 1-2			
31	CT2-1		} set	
32	↓ 2-2			
33	CT3-1		} set	
34	↓ 3-2			
35	INS1-1		} set	
36	↓ 1-2			
37	INS2-1		} set	
38	↓ 2-2			
39	INS3-1	↓	} set	
40	↓ 3-2	—		

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Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
41 16	GYPM	300Z		
42 17	⊥ 1-2			
43 18	CTM-1			
44 19	⊥ 4-2			
45 20	SVF1M			
46 21	⊥ 1-2			
47 22	SVF2-1			
48 23	⊥ 2-2			
49 24	SVF 3-1			
50 25	⊥ 3-2			
51 26	SVF4-1			
52 27	⊥ 4-2			
53 28	WP1-1			
54 29	⊥ 1-2			
55 30	WP2-1			
56 31	⊥ 2-2			
57 32	WP3-1			
58 33	⊥ 3-2			
59 34	WPA1-1			
60 35	⊥ 1-2			
61 36	WPA2-1			
62 37	⊥ 2-2			
63 38	FLU1-1			
64 39	⊥ 1-2			
65 40	CP1-1	⊥		

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AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
66 16	CP1-2	3002	Set w/ CP1-1	
67 17	BV 1-1		7 Set	
68 18	↓ 1-2			
69 19	FS1-1		7 Set	
70 20	↓ 1-2			
71 21	WG1-1		7 Set	
72 22	↓ 1-2			
73 23	CB1-1		7 Set	
74 24	↓ 1-2			
75 25	RCLK1-1		7 Set	
76 26	↓ 1-2			
77 27	RM1-1		7 Set	
78 28	↓ 1-2			
79 29	RT1-1		7 Set	
80 30	↓ 1-2			
81 31	RM2-1		7 Set	
82 32	↓ 2-2			
83 33	RT2-1		7 Set	
84 34	↓ 2-2			
85 35	ECLK1-1		7 Set	
86 36	↓ 1-2			
87 37	WPA 3-1		7 Set	
88 38	3-2	↓		
39				
40				

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Page 1 of 1

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Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date: 6/14/24	Relinquished By/Date: 6/14/24
Reporting Address		Relinquished By/Date:	Received By/Date: AG 6/14/24 @ 1730
Billing Address	7555 W. 10th Ave., Lakewood CO	Sampler Type: Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐ Other ☐ BioCulture ☐
Phone/Fax	720-369-6609	PO#/Job#:	
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group	Project Name: AV for Property E. 136th & N. Quebec St. Thornton, CO	
Routine ☒	24 Hour ☐ Same Day ☐ 4 Hour ☐ 2 Hour ☐	Notes:	
SAMPLING LOCATION ZIP CODE		CC Info:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	SM5-1	3007		
2	5-2			
3	5-3			
4	JC 5-1			
5	5-2			
6	GYP 2-1			
7	2-2			
8	NPA 4-1			
9	4-2			
10	ELLK 2-1			
11	2-2			
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- Swab/Tape
1050	Direct, Qualitative- Bulk
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
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1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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A: pom 6.19.24

V: ———

Q: TH 6/21/24

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PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 2 – Well House

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The well house, is a single-story wood framed constructed building with corrugated metal siding, tar/shingle roofing and concrete floor, the structure is approximately 90 square feet and it house the well and associated pump.

Summary of Findings

The asbestos inspection detailed in this report did not identify ACM(s) that require professional abatement activities prior to the demolition of the structure.

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (2-GYP1)	Painted Unfinished Gypsum Board	· Walls **// No Asbestos Detected //** **// May Remain for Demo //**

Homogeneous Area 2 (2-CP1)	Grey Concrete Patch Material	· Top and sides of well housing cracks **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 3 (2-WG1)	Off-White Window Glazing	· Windows, east and west side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (2-TP1)	Black Tar Felt Paper	· Exterior walls under metal siding **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 5 (2-RM1)	Rolled Roof Shingle with Grey Aggregated over Roof Shingles with Red Aggregate and Associated Tar & Felt Paper	· Roof **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 2-GYP1-1 Sample Location: Interior, south wall Sample ID: 2-GYP1-2 Sample Location: Interior, east wall ***See Appendix B for Sample Location Map*	Description: **Painted Unfinished Gypsum Board** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~96 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 2-CP1-1 Sample Location: Top of well housing Sample ID: 2-C1-2 Sample Location: East side of well housing ***See Appendix B for Sample Location Map*	Description: **Grey Concrete Patch Material** Classification: Miscellaneous Material Condition: Good Quantity: ~1 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 3	Sample ID: 2-WG1-1 Sample Location: East window Sample ID: 2-WG1-2 Sample Location: East window ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~0.25 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: 2-TP1-1 Sample Location: Exterior wall, west side Sample ID: 2-TP1-2 Sample Location: Exterior wall, south side ***See Appendix B for Sample Location Map*	Description: **Black Tar Felt Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~416 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: 2-RM1-1 Sample Location: Roof, NE side Sample ID: 2-RM1-2 Sample Location: Roof, NW side ***See Appendix B for Sample Location Map*	Description: **Rolled Roof Shingle with Grey Aggregated over Roof Shingles with Red Aggregate and Associated Tar & Felt Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~90 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation

- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are a CDPHE certified Building Inspector; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did not identify ACM(s) that will require professional abatement activities prior to the demolition of the structure.

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume

equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air

samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility

or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

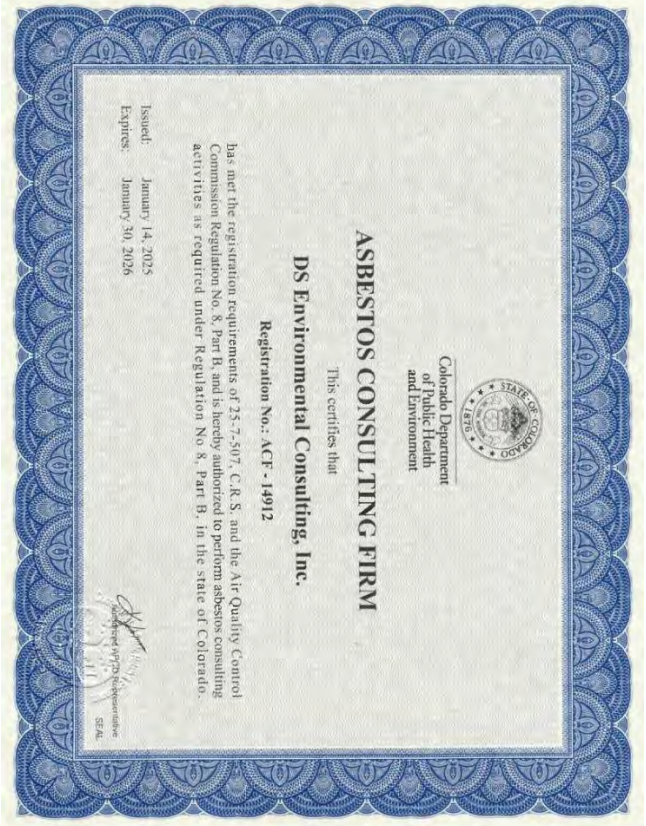
Expires: June 05, 2026

* 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

David Moss Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

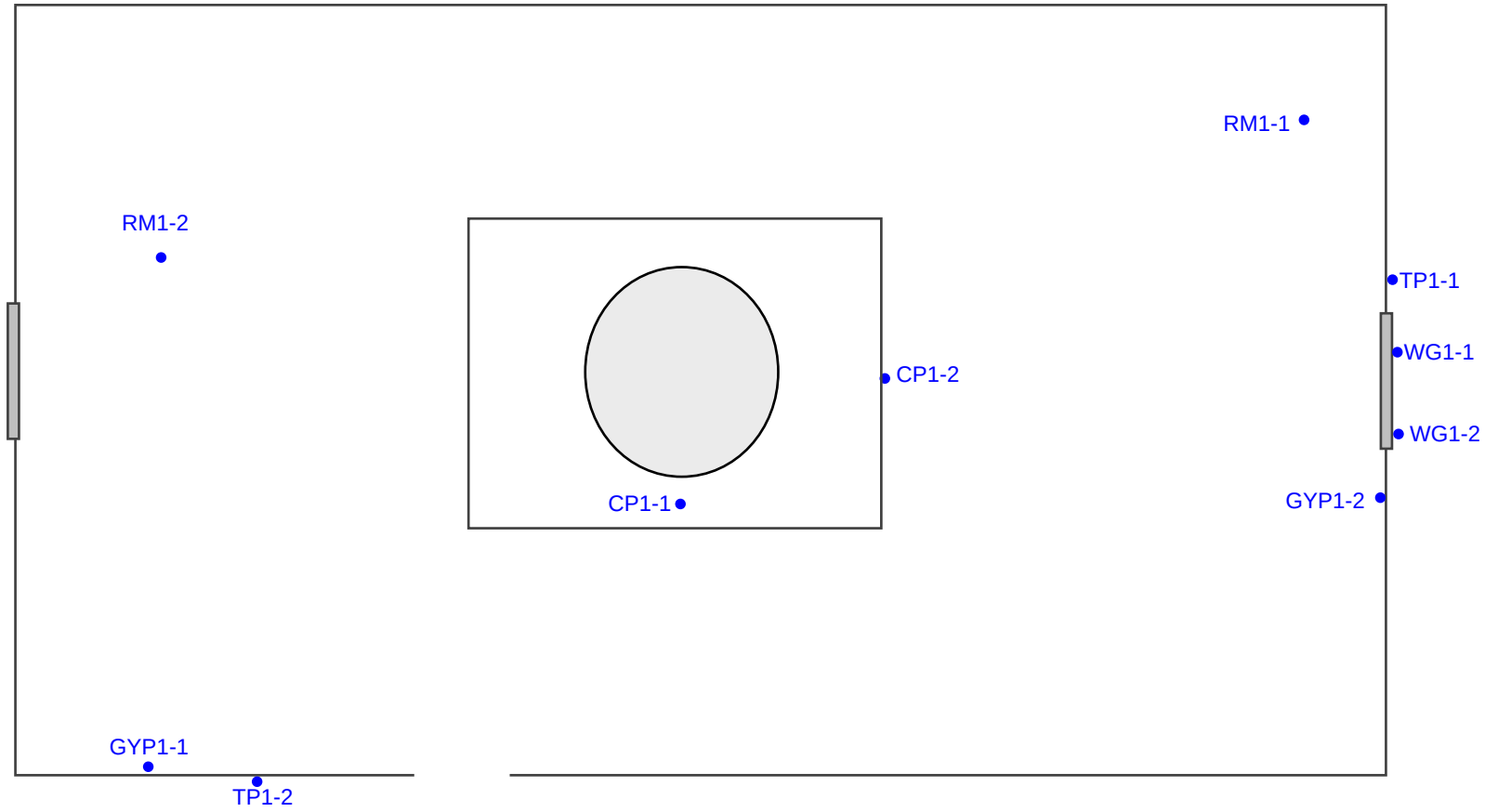
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

N

N.T.S.

Structure 2 - Well House

DS Environmental CONSULTING

APPENDIX C: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 2 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029918

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
2-GYP1-1	22029918-1	100	Pink/Brown Drywall with Gray Paint	ND		25 CELL	75	G	N
2-GYP1-2	22029918-2	100	Pink/Brown Drywall with Gray Paint	ND		15 CELL	85	G	N
2-CP1-1	22029918-3A	10	Off-White Granular Material	ND			100	Q	N
	22029918-3B	90	Gray Plaster	ND			100		N
2-CP1-2	22029918-4		SAMPLE NOT RECEIVED						
2-WG1-1	22029918-5A	Tr	Silver Paint	ND			100		Y
	22029918-5B	100	Off-White Glazing	ND			100		Y
2-WG1-2	22029918-6	100	Off-White Glazing	ND			100		Y
2-TP1-1	22029918-7	100	Black Felt	ND		75 CELL	25	T	N
2-TP1-2	22029918-8	100	Black Felt	ND		75 CELL	25	T	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 2 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029918

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
2-RM1-1	22029918-9A	25	Tan/Brown Shingle	ND		30 CELL	70	G,Q	N
	22029918-9B	25	Brown/Gray Shingle	ND		40 FG	60	Q,T	N
	22029918-9C	50	Black Felt	ND		75 CELL	25	T	N
2-RM1-2	22029918-10A	20	Tan/Brown Shingle	ND		30 CELL	70	G,Q	N
	22029918-10B	25	Brown/Gray Shingle	ND		60 FG	40	Q,T	N
	22029918-10C	55	Black Felt	ND		75 CELL	25	T	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	-
Street Address	7555 W. 10th Ave, Suite A	NVLAP Lab Code 200860-0	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/5/2022
Attn:	Chris Lehman		Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 2 / E. 136th & Quebec St, Thornton, CO		Project ID:	22029918

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

AEROBIOLOGY LABORATORY ASSOCIATES, INCORPORATED
A Pace Analytical® Laboratory

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
2-CP1-1	24020980-1A	90	Gray Cementitious Material	ND			100	C	N
	24020980-1B	10	Off-White Granular Cementitious Material	ND			100	Q,C	N
5-TAR1-1	**24020980-2**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR1-2	**24020980-3**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-1	**24020980-4**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-2	**24020980-5A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-5B	5	Gray Granular Material with White Paint	ND			100	Q	N
5-CMUP2-1	**24020980-6**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-CMUP2-2	**24020980-7A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-7B	5	Gray Granular Material	ND			100	Q	N

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite

Q = Quartz
T = Tar
V = Vermiculite

AEROBIOLOGY LABORATORY ASSOCIATES, INCORPORATED
A Pace Analytical® Laboratory

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
5-WINS1-1	24020980-8	100	Black/Gray Wrap	ND		80 CELL	20	T	N
5-WINS1-2	24020980-9A	80	Black/Gray Wrap	ND		80 CELL	20	T	N
	24020980-9B	20	Black Resinous Material	ND			100	B	N
6-TP1-1	24020980-10A	10	Black Tar	ND			100	T	Y
	24020980-10B	90	Black Felt	ND		60 CELL	40	T	N
6-TP1-2	24020980-11A	20	Black Tar	ND			100	T	Y
	24020980-11B	80	Black Felt	ND		60 CELL	40	T	N
6-TP2-1	24020980-12A	5	Black Tar	ND			100	T	Y
	24020980-12B	95	Black Felt	ND		60 CELL	40	T	N
6-TP2-2	24020980-13A	5	Black Tar	ND			100	T	Y

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite

Q = Quartz
T = Tar
V = Vermiculite

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Certificate of Analysis

Client Name	DS Environmental Consulting	Date Collected:	6/7/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/11/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/12/2024
Attn:	Chris Lehman	Date Reported:	6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO	Project ID:	24020980

NVLAP® TESTING
NVLAP Lab Code 200860-0

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
6-TP2-2	24020980-13B	95	Black Felt	ND		60 CELL	40	T	N
6-RS1-1	24020980-14	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RS1-2	24020980-15	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RP1-1	**24020980-16**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**
6-RP1-2	**24020980-17**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite

Q = Quartz
T = Tar
V = Vermiculite

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be performed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distinguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

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Aerobiology Client	DS Environmental Consulting, Inc.				
Field Contact	Chris Lehman	Collected By/Date:		Relinquished By/Date:	
Reporting Address		Relinquished By/Date:		Received By/Date:	Pam 8.1.22 @ 9am
Billing Address	7555 W. 10th Ave, Lakewood, CO	Sampler Type	Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609	PO#/Job#:			
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group	Project Name:	Aylor Property - Structure 2		
Routine x / 24 Hour ☐ / Same Day ☐ / 4 Hour ☐ / 2 Hour ☐		Notes:	E. 136th & Quebec St, Thornton, CO		
SAMPLING LOCATION ZIP CODE		CC Info:	Analyze sets progressive		

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	2-GYPH	3002	>set	
2	1 1-2			
3	2-CPH		>set	
4	1 1-2		Sample not received AW 8/1/2022	
5	2-WGH		>set	
6	1 1-2			
7	2-TPH		>set	
8	1 1-2			
9	2-RMH		>set	
10	1 1-2	1		
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY ND

A: to 8/5/22

V: ———

Q: AW 8/8/2022

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FL

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PER Chris - mm 6/12/24

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NVLAP AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.						
Field Contact	Chris Lehman				Collected By/Date: 6/7/24	Relinquished By/Date:	
Reporting Address					Relinquished By/Date:	Received By/Date: mm 6/11/24 4:34p	
Billing Address	7555 W. 10th Ave., Lakewood CO				Sampler Type: Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609				PO#/Job#:		
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group				Project Name: Aylor - 136th + Quebec, Thornton, CO		
Routine ☒	24 Hour ☒	Same Day ☐	4 Hour ☐	2 Hour ☐	Notes:		
SAMPLING LOCATION ZIP CODE					CC Info:		

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	2-CP1-1		Structure 2	
2	5-TAR1-1		Structure 5	
3	" 1-2			
4	5-TAR2-1			
5	" 2-2			
6	5-Cmup2-1			
7	" 2-2			
8	5-WINS 1-1			
9	" 1-2			
10	6-TP1-1		Structure 6	
11	1-2			
12	6-TP2-1			
13	2-2			
14	6-RS1-1			
15	1-2			

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- Swab/Tape
1050	Direct, Qualitative- Bulk
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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Q: ERT 6/13/24

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NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
16	6-RP1-1	3007	Structure 6	
17	1 1-2	1	1 1	
18				
19				
20				
21				
22				
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40				

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PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 3 – Poultry Shed

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Front Range 7555 W 10th Ave
Suite A, Lakewood, CO 80214

Mountains PO Box 6864
Avon, CO 81620

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Aspen, CO 81612

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Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The poultry shed, is a single-story wood frame constructed building with metal siding, approximately 1,600 square feet. The structure has a carport on the north side; the south side interior is an unfinished space with corrugated metal walls.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Pink Cement Board Siding Shingle Debris (3-CB1)	Siding pieces on the floor, SW and NE side		~16 SF	**YES** – Friable
Black Tar Sealant (3-RT1)	Perimeter roof flashing and south side electrical pole penetration		~146 SF	**YES** – Friable
Black Tar Patch Sealant (3-FTP1)	Interior slab cracks and perimeter of slab		~264 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (3-CB1)	**Pink Cement Board Siding Shingle Debris**	· Cement board pieces on the floor, SW and NE side **// 10% Asbestos Detected //** **// Non-Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 2 (3-WG1)	Exterior Off-White/Light Grey Window Glazing	· Exterior windows **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 3 (3-INS1)	Yellow Wool Insulation	· Carport wall cavities **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (3-RP1)	Black Fibrous Paper	· Upper south wall of carport, separates carport from interior **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 5 (3-RM1)	Rolled Roofing Shingles with Red Aggregate over Rolled Roofing Shingles with Light Grey Aggregate, Tar Felt Paper and Associated Tar	· Roof **// No Asbestos Detected //** **// May Remain for Demo //**

Homogeneous Area 6 (3-RT1)	**Black Tar Sealant**	· Perimeter roof flashing and south side electrical pole penetration **// 8% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 7 (3-FTP1)	**Black Tar Patch Sealant**	· Interior slab cracks and perimeter of slab **// 12% Asbestos Detected //** **// Friable //** · **// Requires Abatement Prior to Demo //**
· 10/28/2025 Site Revisit		
Homogeneous Area 8 (TB1)	Fiberboard with Black Tar Backing and Facing	· Car Port: north and west exterior walls under siding **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

	ACRONYMS	**ACM ASSESSMENT CATEGORIES**
SUMMARY OF FINDINGS	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Sample Information ****See Appendix B for Sample Location Map**		**Material Information**	**Asbestos Content**
HOMOGENEOUS AREA 1	Sample ID: 3-CB1-1 Sample Location: Sample ID: 3-CB1-2 Sample Location: ***See Appendix B for Sample Location Map*	Description: **Pink Cement Board Siding Shingle Debris** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~16 ft^2 Friability: Friable Assessment Category: 6 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	10% CHRY

HOMOGENEOUS AREA 2	Sample ID: 3-WG1-1 Sample Location: Exterior SE window Sample ID: 3-WG1-2 Sample Location: Exterior NE window ***See Appendix B for Sample Location Map*	Description: **Exterior Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~2 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 3	Sample ID: 3-INS1-1 Sample Location: Carport, west wall, south side Sample ID: 3-INS1-2 Sample Location: Carport, west wall, north side ***See Appendix B for Sample Location Map*	Description: **Yellow Wool Insulation** Classification: Miscellaneous Material Condition: Damaged Quantity: ~40 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: 3-RP1-1 Sample Location: Carport, south upper wall, east side Sample ID: 3-RP1-2 Sample Location: Carport, south upper wall, center ***See Appendix B for Sample Location Map*	Description: **Black Fibrous Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~36 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: 3-RM1-1 Sample Location: Roof, NE side Sample ID: 3-RM1-2 Sample Location: Roof, SW side ***See Appendix B for Sample Location Map*	Description: **Roofing Shingles with Red Aggregate and Associated Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1,206 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 6	Sample ID: 3-RT1-1 Sample Location: Roof perimeter flashing, south side Sample ID: 3-RT1-2 Sample Location: Electrical pole boot flashing ***See Appendix B for Sample Location Map*	Description: **Black Tar Sealant** Classification: Miscellaneous Material Condition: Damaged Quantity: ~146 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	8% CHRY

HOMOGENEOUS AREA 7	Sample ID: 3-FTP1-1 Sample Location: Slab crack, east side center Sample ID: 3-FTP1-2 Sample Location: Perimeter slab, north side ***See Appendix B for Sample Location Map*	Description: **Black Tar Patch Sealant** Classification: Miscellaneous Material Condition: Damaged Quantity: ~264 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	12% CHRY
10/28/2025 Site Revisit			
HOMOGENEOUS AREA 8	Sample ID: TB1-1 Sample Location: Carport: west exterior wall Sample ID: TB1-2 Sample Location: Carport: west exterior wall ***See Appendix B for Sample Location Map*	Description: **Fiberboard with Black Tar Backing and Facing** Classification: Miscellaneous Material Condition: Damaged Quantity: ~336 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman, Mr. Brandon Sinkbeil, and Mr. David Moss certified Building Inspectors with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged friable ACM present below the trigger levels (~16 sq. ft. of cement board shingle pieces & debris), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site; therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove: 1.) cement board siding shingle pieces 2.) perimeter roof flashing and south side electrical pole penetration.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)

- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Brandon Sinkbeil

Certification No.: 13442

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:

Inspector/Management Planner*

Issued: May 05, 2022

Expires: June 10, 2023

* 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

Brandon Sinkbeil 2022 Inspector Certification: 13442

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

Brandon Sinkbeil

Certification No.: 13442

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:

Inspector/Management Planner*

Issued: May 17, 2024

Expires: June 10, 2025

* 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

Brandon Sinkbeil 2024 Inspector Certification: 13442

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

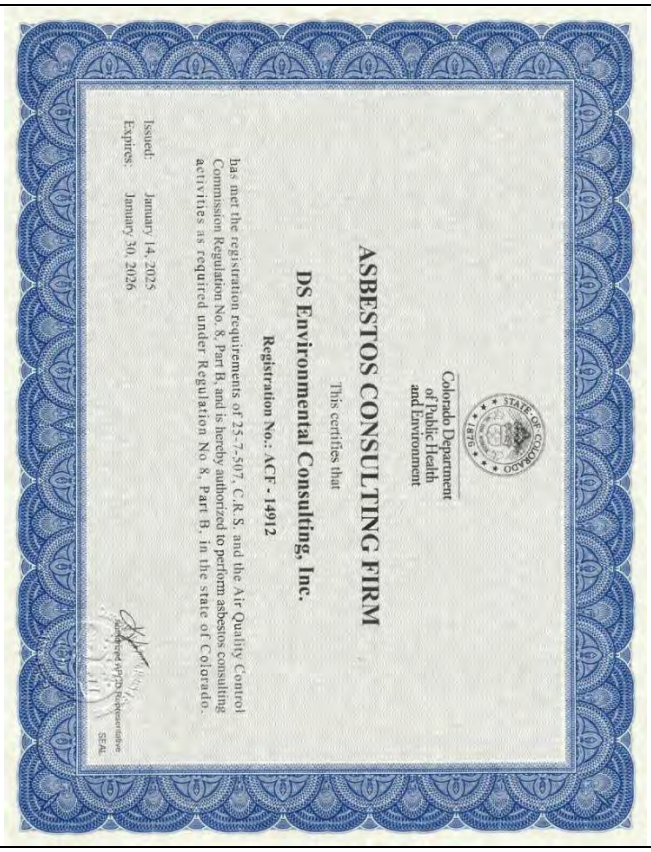
Expires: June 05, 2026

** 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

Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

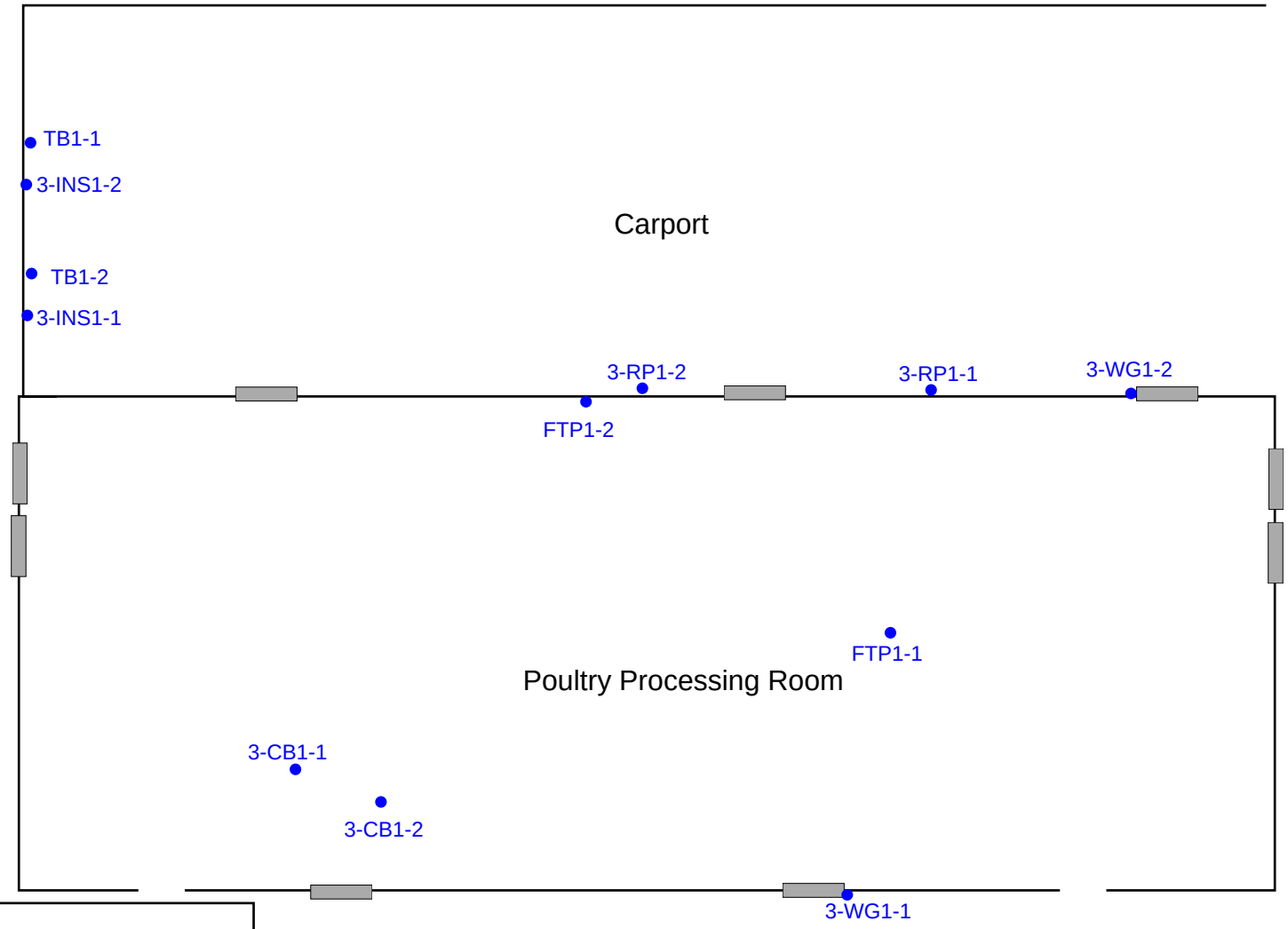
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



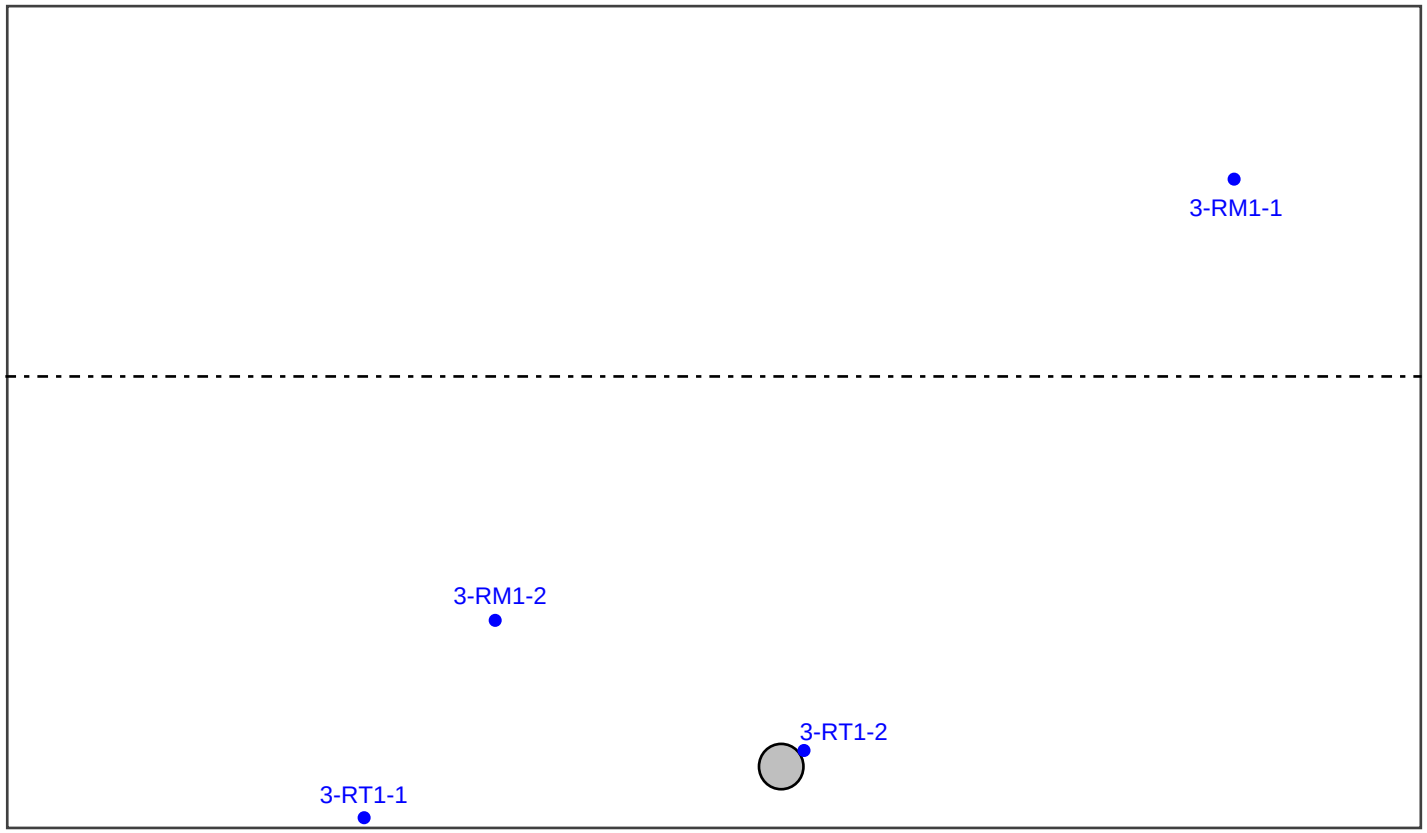
Key:

N

N.T.S.

Aylor Parks & Open Space - Structure 3 - Poultry Shed

DS Environmental CONSULTING



Key:

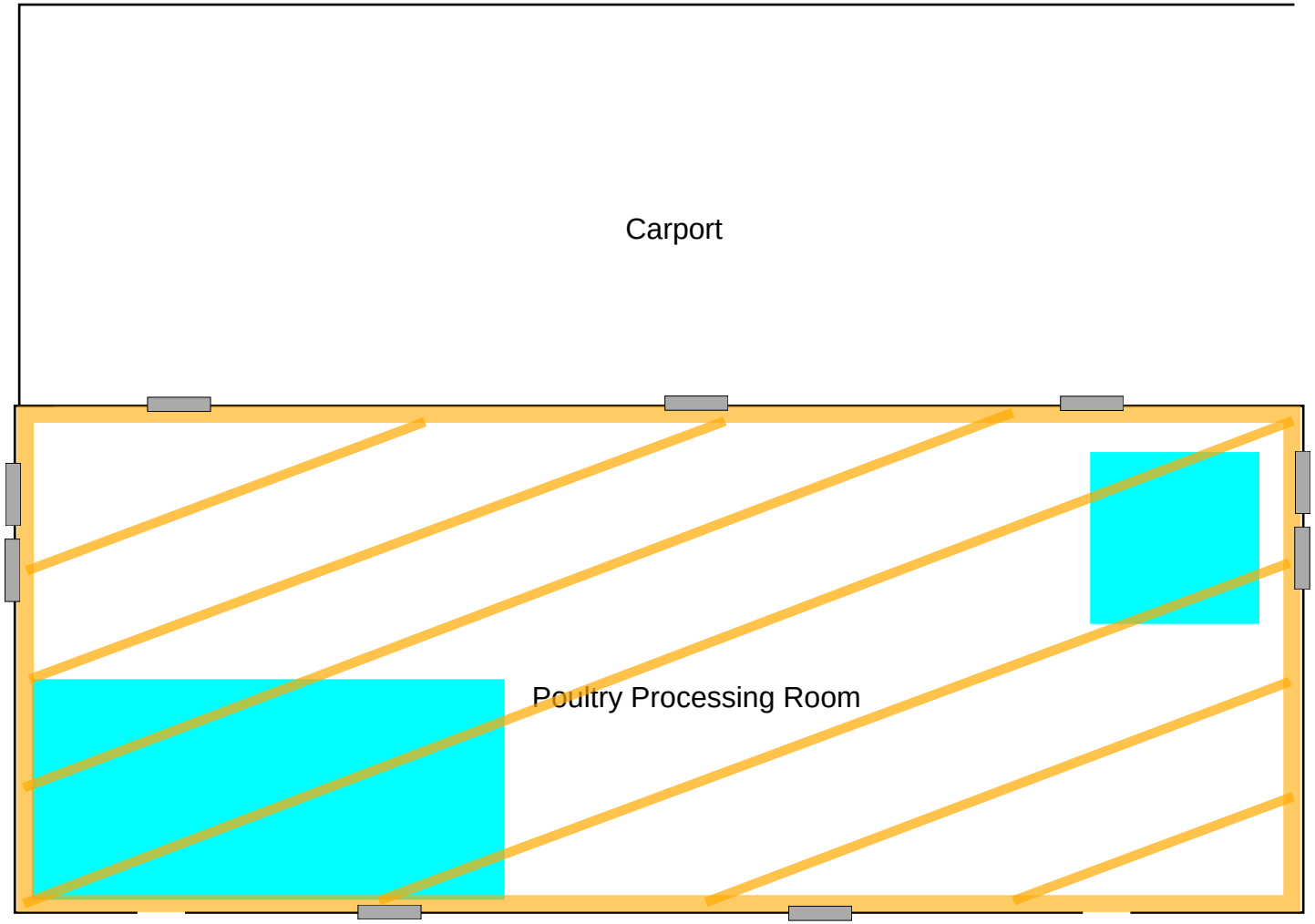
N

N.T.S.

Aylor Parks & Open Space - Structure 3 - Poultry Shed Roof

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Un-Installed Cement Siding (3-CB1)

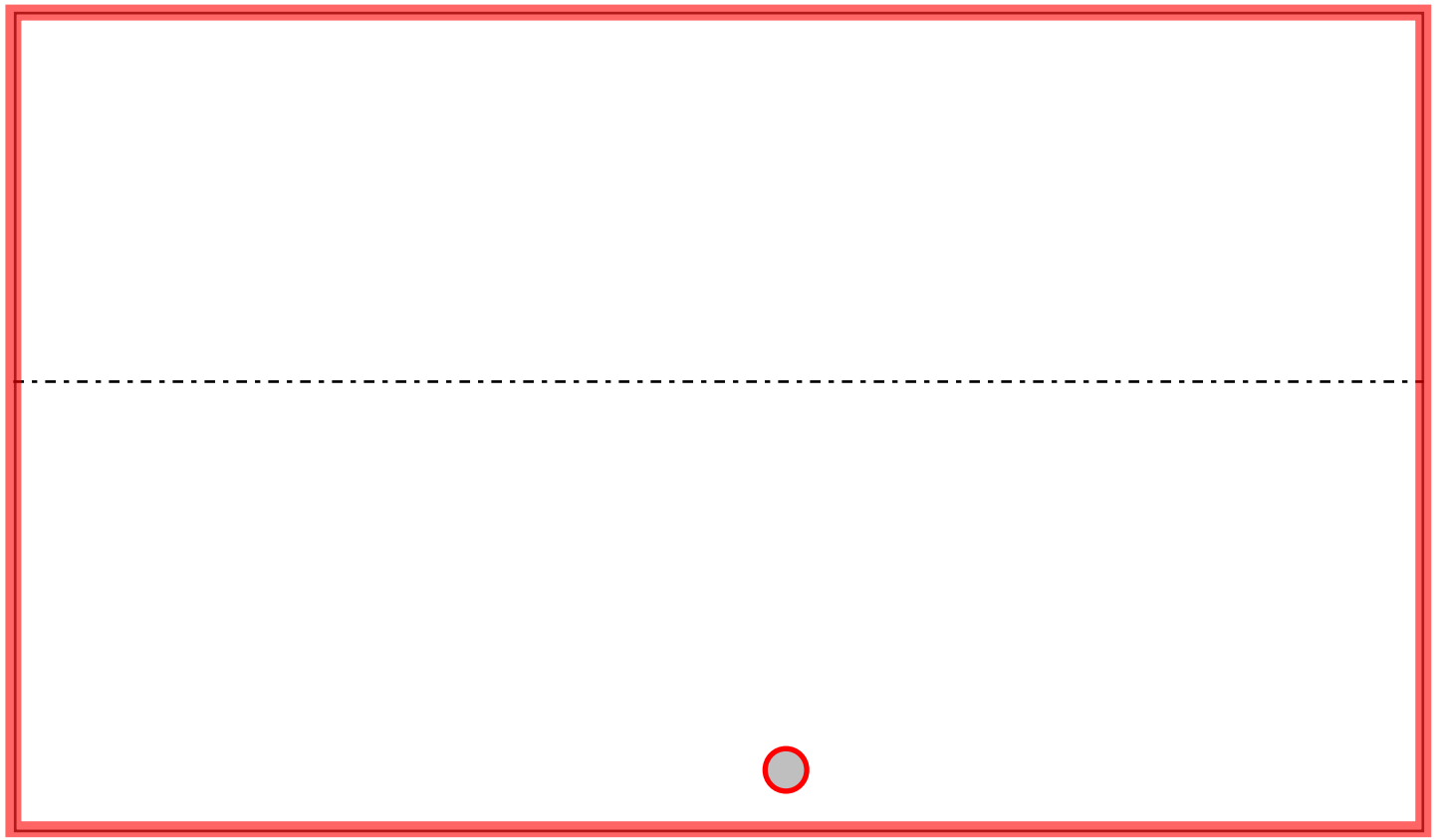
Tar on Concrete Slab Cracks (3-FTP1)

N

N.T.S.

Aylor Parks & Open Space - Structure 3 - Poultry Shed

DS Environmental CONSULTING



Key:

Roofing Tar (3-RT1)

N

N.T.S.

Aylor Parks & Open Space - Structure 3 - Poultry Shed Roof

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

eurofins | Built Environment Testing Reservoirs

October 28, 2025

Subcontractor Number:
Laboratory Report: **RES 701268-1**
Project #/P.O. #: **None Given**
Project Description: **E 136th Ave, &Quebec St,Thornton,CO-3**

David Moss
DS Environmental Consulting, Inc.
7555 W. 10th Ave. Suite A
Lakewood, CO 80214

Dear David,

Eurofins Reservoirs 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 LAP), Lab ID 101533 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Eurofins Reservoirs 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 701268-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Eurofins Reservoirs 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, as received and with the information provided by the customer. 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 Eurofins Reservoirs. 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
by Camryn Baumgartner

Jeanne Spencer
President

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number:	**RES 701268-1**
Client:	**DS Environmental Consulting, Inc.**
Client Project/P.O.:	**None Given**
Client Project Description:	**E 136th Ave, &Quebec St,Thornton,CO-3**
Date Samples Received:	**October 28, 2025**
Analysis Type:	**EPA 600/R-93/116 - Short Report, Bulk**
Turnaround:	**Priority**
Date Samples Analyzed:	**October 28, 2025**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
701268 - Tb1-1	A	Tan fiberboard w/ black tar	100		ND	75	25.0
701268 - Tb1-2	A	Tan fiberboard w/ black tar	100		ND	75	25.0

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

Tyler Hutchinson
Analyst

eurofins | Built Environment Testing Reservoirs

RES Job #: 701268

SUBMITTED BY		INVOICE TO		CONTACT INFORMATION		SERIES
Company:	DS Environmental Consulting, Inc.	Company:	DS Environmental Consulting, Inc.	Contact:	David Moss	-1 PLM Priority
Address:	7555 W. 10th Ave. Suite A	Address:	7555 W. 10th Ave. Suite A	Phone:	(720) 215-7198	
	Lakewood, CO 80214		Lakewood, CO 80214	Fax:		
				Cell:	(720) 215-7198	
Project Number and/or P.O. #:	None Given	Project Zip Code:		Final Data Deliverable Email Address:		
Project Description/Location:	E 136th Ave, &Quebec St,Thornton,CO-3			david@dsconsultinginc.com (+ 9 ADDNL. CONTACTS)		

ASBESTOS LABORATORY

PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD

CHEMISTRY LABORATORY

Dust RUSH PRIORITY STANDARD

Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT

Organics* SAME DAY RUSH PRIORITY STANDARD

MICROBIOLOGY LABORATORY

Viable Analysis** PRIORITY STANDARD

**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH

Medical Device Analysis RUSH STANDARD

Mold Analysis RUSH PRIORITY STANDARD

****Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.****

Special Instructions:

VALID MATRIX CODES

Air = A	Bulk = B
Dust = D	Food = F
Paint = P	Soil = S
Surface = SU	Swab = SW
Tape = T	Wipe = W
Drinking Water = DW	
Waste Water = WW	
ASTM E1792 approved wipe media only	

LAB NOTES

Laboratory Analysis Instructions

Client Sample ID Number (Sample ID's must be unique)	REQUESTED ANALYSIS: ASBESTOS PLM - PLM Short Report (EPA/600/R-93/116)	ASBESTOS TEM	ASBESTOS PCM	ASBESTOS NYS	CHEMISTRY DUST	CHEMISTRY METALS	CHEMISTRY ORGANICS	MICROBIOLOGY VIABLES	MICROBIOLOGY MEDICAL	MICROBIOLOGY MOLD	ICO	Sample Volume (L) / Area	Sample Temperature (°C)	Length(or Aliquots) x Width(or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm
1 Tb1-1	X														B			
2 Tb1-2	X														B			

Eurofins Reservoirs Environmental, Inc establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number.
Eurofins Reservoirs Environmental, Inc 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 NET30. Failure to comply with payment terms may result in a 18% APR finance charge.

Relinquished By:		David Moss	Date/Time: 10/28/2025 14:21:56	Sample Condition: Acceptable
Received By:		Dylan Polier	Date/Time: 10/28/2025 14:30:04	Carrier: Hand

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Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 3 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029928

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
3-CB1-1	**22029928-1**	**100**	**White/Gray Fibrous Cementitious Material with Pink Paint**	**CHRY**	**10**		**90**	**Q**	**N**
3-CB1-2	22029928-2		POSITIVE STOP						
3-WG1-1	22029928-3	100	White/Gray Glazing	ND			100		N
3-WG1-2	22029928-4A	Tr	Silver Paint	ND			100		Y
	22029928-4B	100	White-Gray Glazing	ND			100		N
3-INS1-1	22029928-5	100	Yellow Fibrous Material	ND		95 MW	5		N
3-INS1-2	22029928-6	100	Yellow Fibrous Material	ND		95 MW	5		N
3-RP1-1	22029928-7	100	Gray Fibrous Material	ND		95 CELL	5		N
3-RP1-2	22029928-8	100	Gray Fibrous Material	ND		95 CELL	5		N
3-RM1-1	22029928-9A	20	Red-Brown Shingle	ND		25 FG	75	T,Q	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 3 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029928

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
3-RM1-1	22029928-9B	30	Brown-Gray Shingle	ND		30 CELL	70	T,Q	N
	22029928-9C	25	Black Multilayered Tar	ND			100	T	N
	22029928-9D	25	Black Multilayered Felt with Black Tar	ND		60 CELL	40	T,M	N
3-RM1-2	22029928-10A	20	Red-Brown Shingle	ND		25 FG	75	T,Q	N
	22029928-10B	30	Brown-Gray Shingle	ND		30 CELL	70	T,Q	N
	22029928-10C	25	Black Multilayered Tar	ND			100	T	N
	22029928-10D	25	Black Multilayered Felt with Black Tar	ND		60 CELL	40	T,M	N
3-RT1-1	**22029928-11A**	**65**	**Black Fibrous Tar**	**CHRY**	**8**		**92**	**T**	**N**
	22029928-11B	**15**	**Black Fibrous Tar**	**CHRY**	**8**	**1 FG**	**91**	**T**	**N**
	22029928-11C	15	Black Tar	ND			100	Q	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected
AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite
B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite
Q = Quartz
T = Tar
V = Vermiculite

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780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 3 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029928

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
3-RT1-1	22029928-11D	5	Black Felt	ND		75 CELL,SYN	25	T	N
3-RT1-2	22029928-12		POSITIVE STOP						

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP Lab Code 200860-0	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/8/2022
Attn:	Chris Lehman		Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 3 / E. 136th & Quebec St, Thornton, CO		Project ID:	22029928

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/10/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/10/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	7/11/2024
Attn:	Brandon Sinkbeil	Date Reported:	7/11/2024
Client Project Name:	Aylor Property 136th + Quebec St., Thornton Structure 3	Project ID:	24025152

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
3-FTP1-1	24025152-1A	Tr	Silver/Gray Resinous Material	ND			100		N
	24025152-1B	**100**	**Black Multilayered Felt**	**CHRY**	**12**		**88**	**T**	**N**
3-FTP1-2	24025152-2	POSITIVE STOP							

Anita Grigg
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/10/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 7/10/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 7/11/2024
Attn:	Brandon Sinkbeil		Date Reported: 7/11/2024
Client Project Name:	Aylor Property 136th + Quebec St., Thornton Structure 3		Project ID: 24025152

Test Requested: **3002, Asbestos in Bulk Samples**
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- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
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AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Page 1 of 1

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine [x] / 24 Hour [ ] / Same Day [ ] / 4 Hour [ ] / 2 Hour [ ]	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 MC

Relinquished By/Date: 7/29/22 MC

Relinquished By/Date:

Received By/Date: RM 8-1-22 9am

Sampler Type: Andersen [ ] SAS [ ] SampleAire [ ] AeroTrap [ ] Other [ ] BioCulture [ ]

PO#/Job#:

Project Name: Aylor Property - Structure 3

Notes: E. 136th & Quebec St, Thornton, CO

CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	3-CBL-1	3006	>set	
2	1-2			
3	3-WGL-1		>set	
4	1-2			
5	3-INSL-1		>set	
6	1-2			
7	3RP 1-1		>set	
8	1-2			
9	3-RML-1		>set	
10	1-2			
11	3-RTL-1		>set	
12	1-2			
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY

A: AG 8/8/22

V:

Q: AW 8/9/2022

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Lab Use:
24025152

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Brandon Sinkbeil
Address	7555 W 10th Ave. Suite A
Address	Lakewood, CO 80214
Phone/Fax	970-476-4182
Email	dsc email group

Date / Time: 7/10/24 — Collected By: [signature]

Date / Time: — Received By: MM 7/10/24 5:26p

Sampler Type: Andersen____ SAS____ SampleAire____ AeroTrap____ Other____ BioCulture____

PO#/Job#/Project Name: AM/or Property 136th + Quebec St, Thornton Structure 3

Routine | 24 Hour | Same Day | 4 Hour | 2 Hour | 5 Day (Asbestos Only)

Notes/CC Info: Please call Brandon if Rush or 24-hr is requested. Thanks

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	3FTP1-1	300 T	Analyze progressive	
2	3-FTP1-2	I	↓	
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY

A: AG 7/11/24

V: ERT 7/11/24 2:30p Brandon verbals

Q: ERT 7/11/24

43760 Trade Center Place, Suite 100, Dulles, VA 20166 - (87
4501 Circle 75 Parkway, Ste A1190, Atlanta GA 30339 - (866
13949 W. Colfax Ave, Suite 205, Lakewood, CO 80401 - (866)

DS Environmental CONSULTING

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 4 – Sub-Grade Storage Cellar

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Front Range 7555 W 10th Ave
Suite A, Lakewood, CO 80214

Mountains PO Box 6864
Avon, CO 81620

Western Slope PO Box 3793
Aspen, CO 81612

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Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural sub-grade storage cellar detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The sub-grade storage cellar, is a sub-terranean storage cellar wood framed constructed structure with concrete stairs accessing the east side, the structure is approximately 400 square feet and it was used as a storage cellar/shelter. The cellar was accessible during the initial inspection in 2022, however, the interior was no longer safely accessible due to collapse of a portion of the roof and the entry during a confirmation follow-up inspection in 2024 and 2025.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Black Fibrous Tar Paper & Associated Tar (4-RM1)	Roof vent ducts and debris on ground of interior		~12 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the

suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (4-FB1)	Brown Fiberboard	· Interior ceiling **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (4-RM1)	**Black Fibrous Tar Paper & Associated Tar**	· Roofing vent underlayment and debris on ground of interior **// 20% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
10/28/2025 Site Revisit		
Homogeneous Area 3 (FP1)	Fiberglass Wrapped Pipe	· On ground northwest of structure **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 4-FB1-1 Sample Location: Interior ceiling, SE side Sample ID: 4-FB1-2 Sample Location: Interior ceiling, SW center ***See Appendix B for Sample Location Map*	Description: **Painted Unfinished Gypsum Board** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~400 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 4-RM1-1 Sample Location: Roof deck at vent, east side center Sample ID: 4-RM1-2 Sample Location: Roof deck at vent, east side center ***See Appendix B for Sample Location Map*	Description: **Black Fibrous Tar Paper & Associated Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~26 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	Black Fibrous Tar 20% CHRY

10/28/2025 Site Revisit			
HOMOGENEOUS AREA 3	Sample ID: FP1-1 Sample Location: Pipe Northeast of bunker Sample ID: FP1-2 Sample Location: Pipe Northeast of bunker ***See Appendix B for Sample Location Map*	Description: **Fiberglass Wrapped Pipe** Classification: Miscellaneous Material Condition: Good Quantity: ~10 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the

client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged ACM present below the trigger levels (~12 sq. ft. of black fibrous tar paper & associated tar), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site; therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) friable roofing tar paper on the roof vent penetrations and associated debris on the interior. The interior of the sub-grade structure is currently inaccessible due to collapse of the roof and entry.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume

equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air

samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility

or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

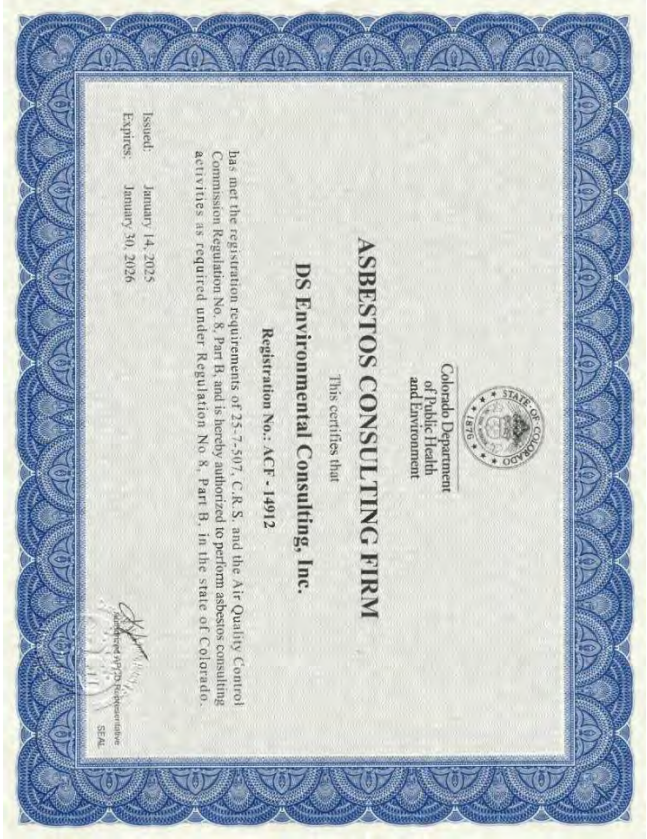
Expires: June 05, 2026

* 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

David Moss Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

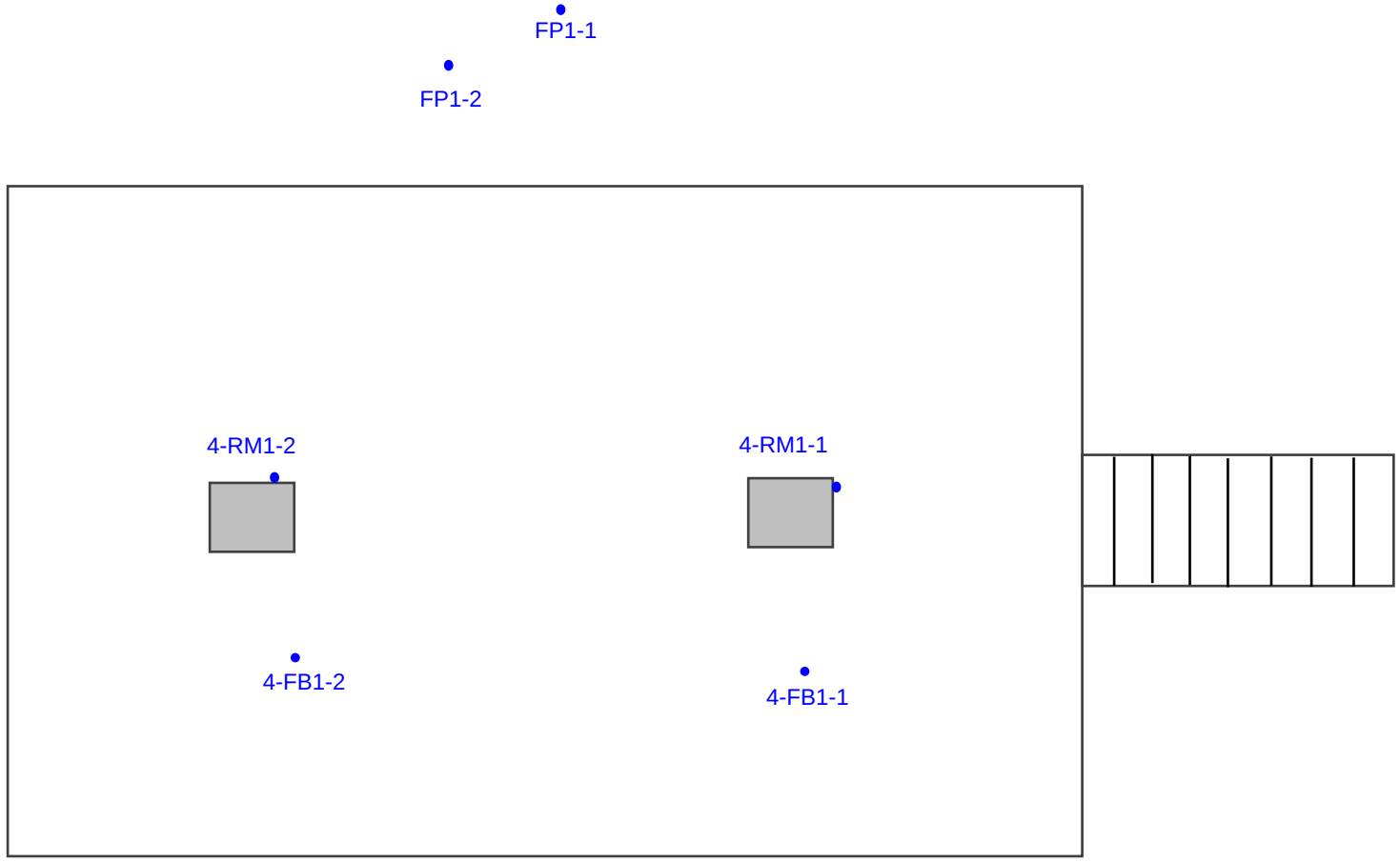
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

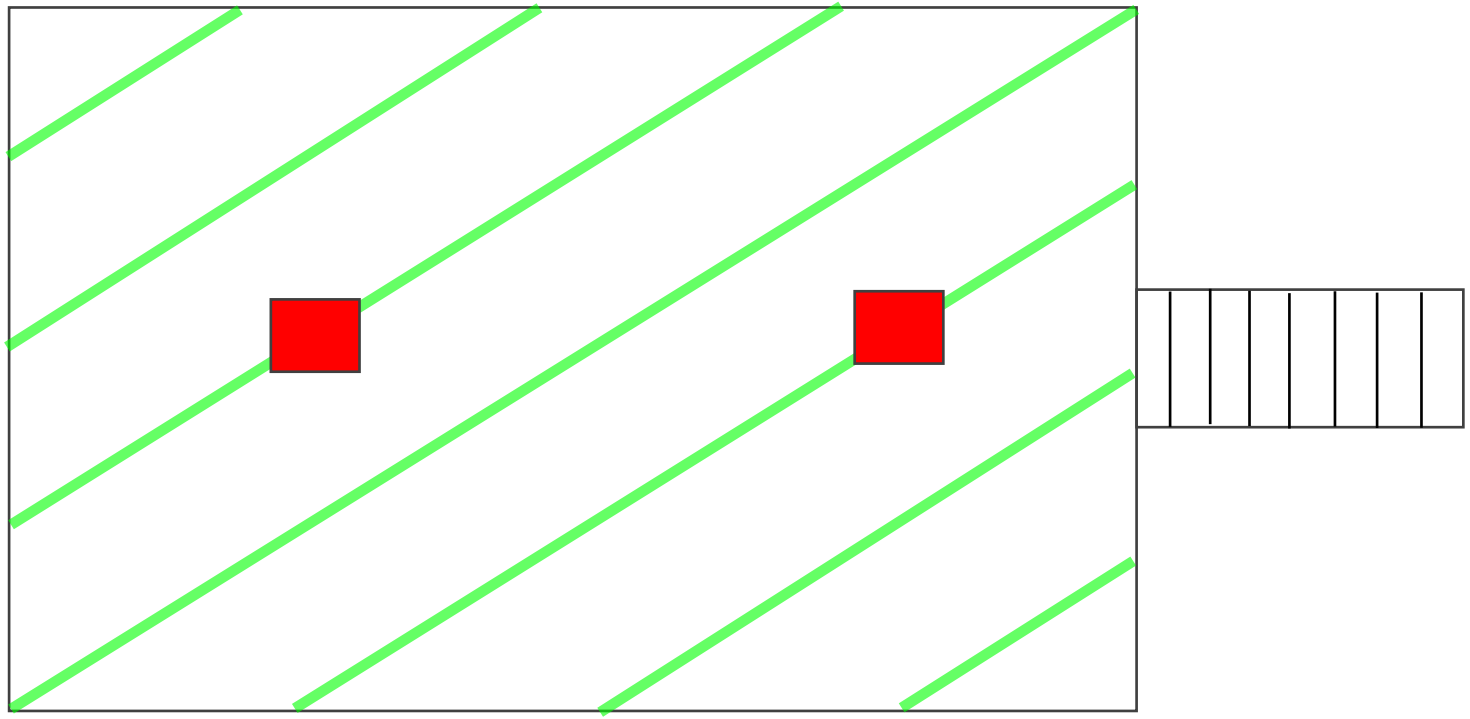
N

N.T.S.

Aylor Parks & Open Space - Structure 4 - Sub-Grade Storage Cellar

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Black Fibrous Tar/Paper (4-RT1)

Black Fibrous Tar/Paper (4-RT1)
(Residual Material/Debris)

N

N.T.S.

Aylor Parks & Open Space - Structure 4 - Sub-Grade Storage Cellar

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

eurofins | Built Environment Testing Reservoirs

October 28, 2025

Subcontractor Number:
Laboratory Report: **RES 701270-1**
Project #/P.O. #: **None Given**
Project Description: **E 136th Ave, &Quebec St,Thornton,CO-4**

David Moss
DS Environmental Consulting, Inc.
7555 W. 10th Ave. Suite A
Lakewood, CO 80214

Dear David,

Eurofins Reservoirs 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 LAP), Lab ID 101533 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Eurofins Reservoirs 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 701270-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Eurofins Reservoirs 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, as received and with the information provided by the customer. 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 Eurofins Reservoirs. 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
by Camryn Baumgartner

Jeanne Spencer
President

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 701270-1**
Client: **DS Environmental Consulting, Inc.**
Client Project/P.O.: **None Given**
Client Project Description: **E 136th Ave, &Quebec St,Thornton,CO-4**
Date Samples Received: **October 28, 2025**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Priority**
Date Samples Analyzed: **October 28, 2025**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
701270 - Fp1-1	A	Black fibrous resinous material	100		ND	85	15.0
701270 - Fp1-2	A	Black fibrous resinous material	100		ND	85	15.0

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

Tyler Hutchinson
Analyst

eurofins | Built Environment Testing Reservoirs

RES Job #: 701270

SUBMITTED BY		INVOICE TO		CONTACT INFORMATION		SERIES
Company:	DS Environmental Consulting, Inc.	Company:	DS Environmental Consulting, Inc.	Contact:	David Moss	-1 PLM Priority
Address:	7555 W. 10th Ave. Suite A	Address:	7555 W. 10th Ave. Suite A	Phone:	(720) 215-7198	
	Lakewood, CO 80214		Lakewood, CO 80214	Fax:		
				Cell:	(720) 215-7198	
Project Number and/or P.O. #:	None Given	Project Zip Code:		Final Data Deliverable Email Address:		
Project Description/Location:	E 136th Ave, &Quebec St,Thornton,CO-4			david@dsconsultinginc.com (+ 9 ADDNL. CONTACTS)		

ASBESTOS LABORATORY

PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD

CHEMISTRY LABORATORY

Dust RUSH PRIORITY STANDARD

Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT

Organics* SAME DAY RUSH PRIORITY STANDARD

MICROBIOLOGY LABORATORY

Viable Analysis** PRIORITY STANDARD

**TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH

Medical Device Analysis RUSH STANDARD

Mold Analysis RUSH PRIORITY STANDARD

****Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.****

Special Instructions:

VALID MATRIX CODES

Air = A	Bulk = B
Dust = D	Food = F
Paint = P	Soil = S
Surface = SU	Swab = SW
Tape = T	Wipe = W
Drinking Water = DW	
Waste Water = WW	
ASTM E1792 approved wipe media only	

LAB NOTES

Laboratory Analysis Instructions

Client Sample ID Number (Sample ID's must be unique)	REQUESTED ANALYSIS: ASBESTOS — PLM - PLM Short Report (EPA/600/R-93/116)	TEM	PCM	NYS	CHEMISTRY — DUST	METALS	ORGANICS	MICROBIOLOGY — VIABLES	MEDICAL	MOLD	ICO	Sample Volume (L) / Area	Sample Temperature (°C)	Length(or Aliquots) x Width(or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm
1 Fp1-1	X														B			
2 Fp1-2	X														B			

Eurofins Reservoirs Environmental, Inc establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number.
Eurofins Reservoirs Environmental, Inc 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 NET30. Failure to comply with payment terms may result in a 18% APR finance charge.

Relinquished By:		David Moss	Date/Time: 10/28/2025 14:23:02	Sample Condition: Acceptable
Received By:		Dylan Polier	Date/Time: 10/28/2025 14:30:54	Carrier: Hand

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780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 4 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029937

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
4-FB1-1	22029937-1	100	Brown Fibrous Material	ND		99 CELL	1		Y
4-FB1-2	22029937-2	100	Brown Fibrous Material	ND		99 CELL	1		Y
4-RM1-1	22029937-3A	30	Black Tar	ND		40 CELL	60	T	Y
	22029937-3B	**70**	**Black Fibrous Tar**	**CHRY**	**20**	**5 FG**	**75**	**T**	**Y**
4-RM1-2	22029937-4		POSITIVE STOP						

Paul Knappe
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Golden, CO, 80401
303.232.3746
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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/8/2022
Attn:	Chris Lehman		Date Reported: 8/9/2022
Client Project Name:	Aylor Property - Structure 4 / E. 136th & Quebec St, Thornton, CO		Project ID: 22029937

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

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Expertise Since 1997

Lab Use: 27079437

Page 1 of 1

AZ, CA, CO, FL, GA, VA, NJ | AZ, CA, CO, VA | AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine x / 24 Hour / Same Day / 4 Hour / 2 Hour	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 MC
Relinquished By/Date: 7/29/22 MC
Relinquished By/Date:
Received By/Date: Rcvd 8-1-22 BMM
Sampler Type: Andersen ☐ SAS ☐ SampleAire ☐ AeroTrap ☐ Other ☐ BioCulture ☐
PO#/Job#:
Project Name: Aylor Property - Structure 4
Notes: E. 136th & Quebec St, Thornton, CO
CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	4-FB H-1	3007	} set	
2	1 1-2			
3	4-RM1-1		} set	
4	1 1-2			
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY

A: Rcvd 8/8/22 +

V:

Q: AW 8/9/2022

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 5 – Chicken Coop Barn

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Front Range 7555 W 10th Ave
Suite A, Lakewood, CO 80214

Mountains PO Box 6864
Avon, CO 81620

Western Slope PO Box 3793
Aspen, CO 81612

Web dsconsultinginc.com

Direct (303) 286-9094

Fax (303) 986-0121

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The chicken coop barn, is a single-story CMU constructed building with a wood framed roof, approximately 1,710 square feet. The west CMU wall of the structure has collapsed and the roof is hanging on the west side of the building.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C. ***This structure is a major asbestos spill, prior to any demolition the spill must be cleaned up following Regulation 8, Section III.T.***

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** *See Appendix C for Material Map*	**Material Photograph**	**Quantity**	**Require Abatement?**
Black/Grey Roofing Tar (5-RT1)	Chimney Flashing East and West Chimneys		~6 SF	**YES** – Friable
Black Tar Sealant (5-CMUP1)	CMU walls, crack patches Sealant around windows		~85 SF	**YES** – Friable
Black Tar Sealant (5-TAR1)	CMU debris in collapsed west wall		~35 SF	**YES** – Friable

Black/Grey Tar Sealant (5-TAR2)	CMU debris in collapsed west wall		~90 SF	**YES** – Friable
Black/Grey Tar Sealant (5-CMUP2)	CMU walls, crack patches Sealant at wood/CMU roof rim		~260 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (5-BF1)	CMU Block Filler	· Interior and exterior walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (5-WG1)	Exterior Off-White Window Glazing	· Exterior windows **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 3 (5-RM1)	Roofing Shingles with Red Aggregate and Associated Tar	· Roof **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (5-RT1)	**Black/Grey Roofing Tar**	· Chimney flashing · Debris on ground west and center rooms **// 10% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 5 (5-CMUP1)	**Black Tar Sealant**	· CMU walls, crack patches · Sealant around windows · Debris on ground east, west and center rooms **// 12% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**

Homogeneous Area 6 (5-TAR1)	**Black Tar Sealant**	· CMU debris in collapsed west wall **// 10% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 7 (5-TAR2)	**Black/Grey Tar Sealant**	· CMU debris in collapsed west wall **// 10% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 8 (5-CMUP2)	**Black/Grey Tar Sealant**	· CMU walls, crack patches · Sealant at wood/CMU roof rim · Debris on ground east, west and center rooms **// 10% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 9 (5-WINS1)	Beige/Black Fibrous Wire Insulation	· Lighting wiring **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 5-BF1-1 Sample Location: Exterior, south wall Sample ID: 5-BF1-2 Sample Location: Interior west room, south wall Sample ID: 5-BF1-3 Sample Location: Interior center room, west wall Sample ID: 5-BF1-4 Sample Location: Interior east room, east wall Sample ID: 5-BF1-5 Sample Location: Exterior, east wall ***See Appendix B for Sample Location Map*	Description: **CMU Block Filler** Classification: Surfacing Material Condition: Significantly Damaged Quantity: ~1,765 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 5-WG1-1 Sample Location: Exterior south center window Sample ID: 5-WG1-2 Sample Location: Exterior SE window ***See Appendix B for Sample Location Map*	Description: **Exterior Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~6 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 3	Sample ID: 5-RM1-1 Sample Location: Roof, west end Sample ID: 5-RM1-2 Sample Location: Roof, east side ***See Appendix B for Sample Location Map*	Description: **Roofing Shingles with Red Aggregate and Associated Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1,710 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: 5-RT1-1 Sample Location: West chimney flashing Sample ID: 5-RT1-2 Sample Location: East chimney flashing ***See Appendix B for Sample Location Map*	Description: **Black/Grey Roofing Tar** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~16 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	10% CHRY
HOMOGENEOUS AREA 5	Sample ID: 5-CMUP1-1 Sample Location: Interior, west room, south wall Sample ID: 5-CMUP1-2 Sample Location: Exterior, south side ***See Appendix B for Sample Location Map*	Description: **Black Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~85 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	12% CHRY
HOMOGENEOUS AREA 6	Sample ID: 5-TAR1-1 Sample Location: West wall debris pile Sample ID: 5-TAR1-2 Sample Location: West wall debris pile ***See Appendix B for Sample Location Map*	Description: **Black Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~35 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	10% CHRY

HOMOGENEOUS AREA 7	Sample ID: 5-TAR2-1 Sample Location: West wall debris pile Sample ID: 5-TAR2-2 Sample Location: West wall debris pile ***See Appendix B for Sample Location Map*	Description: **Black/Grey Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~90 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	10% CHRY
HOMOGENEOUS AREA 8	Sample ID: 5-CMUP2-1 Sample Location: Interior, west room, north wall, top of CMU at wood rim joist Sample ID: 5-CMUP2-2 Sample Location: Interior, west room, NW window frame at CMU ***See Appendix B for Sample Location Map*	Description: **Black/Grey Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~260 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	10% CHRY
HOMOGENEOUS AREA 9	Sample ID: WINS1-1 Sample Location: Interior, west room center Sample ID: WINS1-2 Sample Location: Interior, center room, west side ***See Appendix B for Sample Location Map*	Description: **Beige/Black Fibrous Wire Insulation** Classification: Miscellaneous Material Condition: Damaged Quantity: ~125 lineal ft. Friability: Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. <u>TRACE does not mean it contains less than or equal to 1%.</u>

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-

work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification numbers 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***Multiple tar sealants were found to contain asbestos greater than 1% and the amount of significantly damaged friable ACM (~216 ft²) exceeded the trigger level of 160 ft². This structure is a major asbestos***

spill, prior to any demolition the spill must be cleaned up following Regulation 8, Section III.T, refer to Section 9.0 in this report for more information.

- ***Abatement is required to remove 1.) friable roofing tar on the chimney flashing 2.) friable tar sealant patches on the interior and exterior CMU block walls 3.) friable tar sealant on window/door frames 4.) wood rim cap of roof trusses on CMU block 5.) the significantly damaged debris that created the major spill and associated exterior soils (~2,080 ft²).***

- ***This structure is collapsing on the west end, a structural engineer is recommended to evaluate the structural stability to facilitate abatement.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major

asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8,

assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

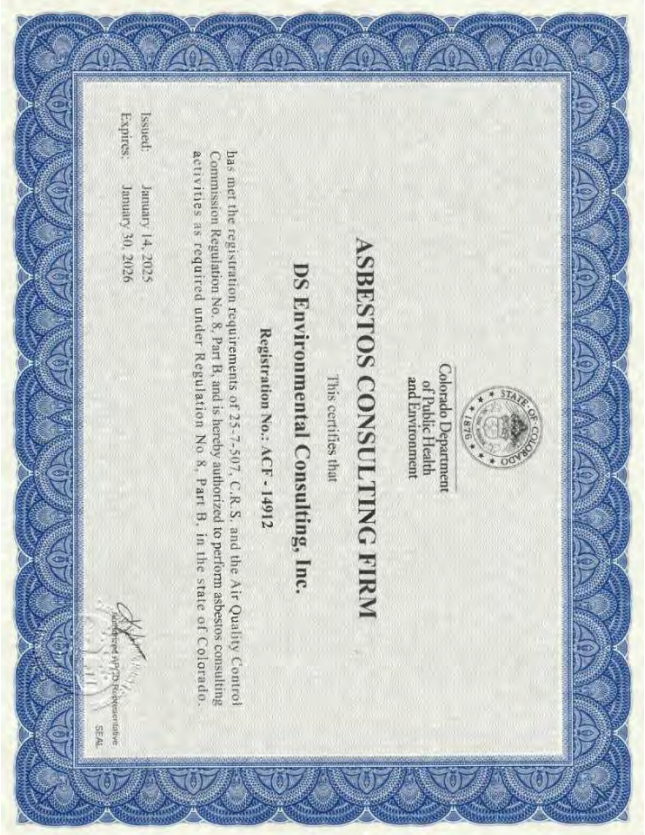
Expires: June 05, 2026

* 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

David Moss Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

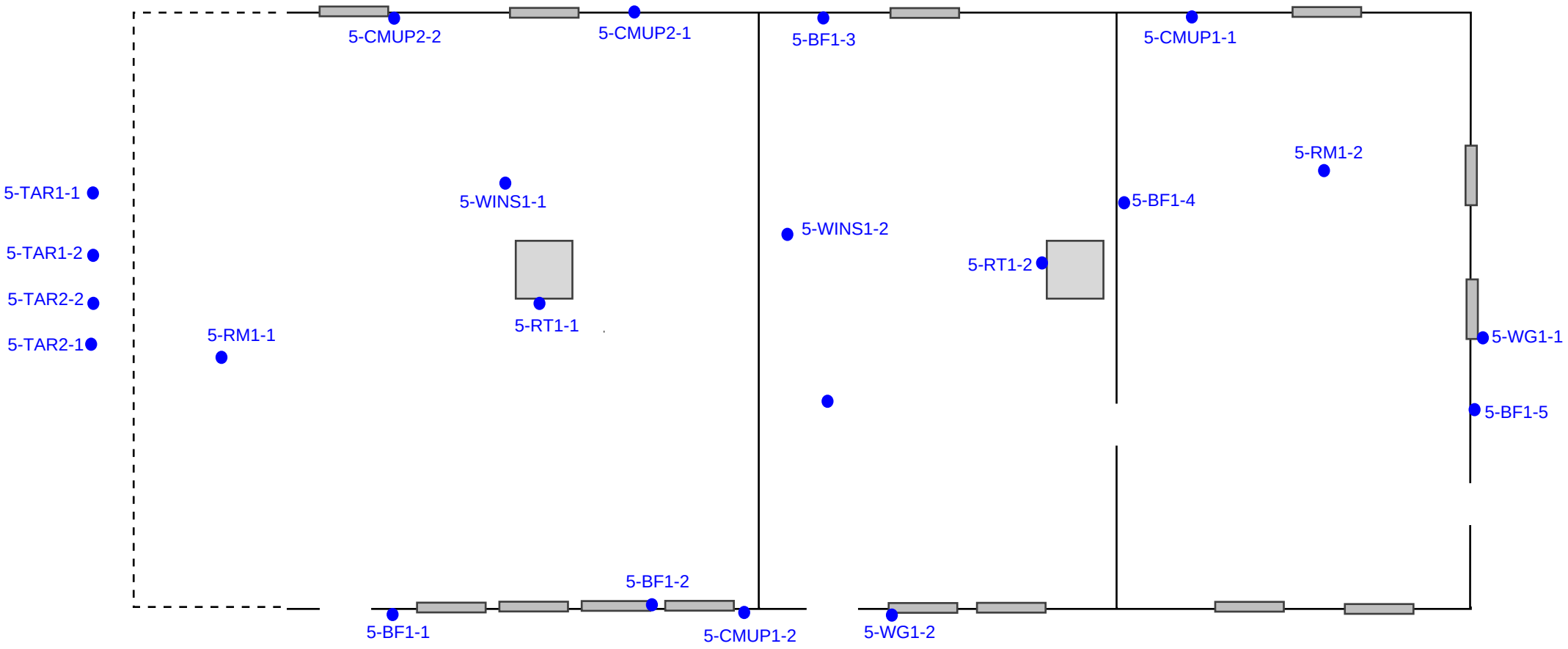
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

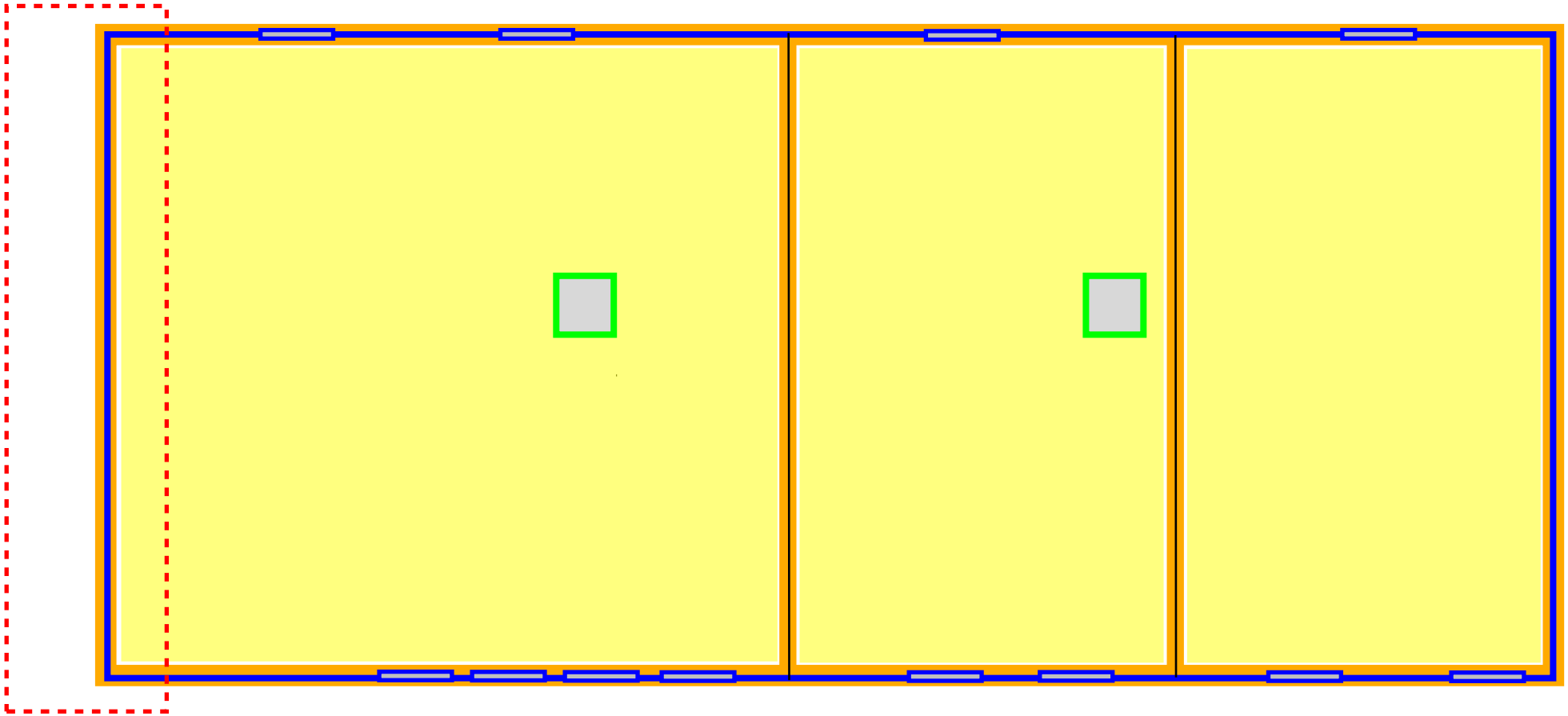
N

N.T.S.

Aylor Parks & Open Space - Structure 5 - Chicken Coop Barn

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

- Roof Flashing Tar (5-RT1)
- Interior/Exterior Tar Patch Material (5-CMUP1)
- Interior/Exterior Tar Sealant (5-CMUP2)
- Collapsed CMU Wall Debris with Tar (TAR1 & TAR2)
- Interior ACM Debris

N

N.T.S.

Aylor Parks & Open Space - Structure 5 - Chicken Coop Barn

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Key:

Exterior ACM Debris & Associated Soil

N

N.T.S.

Aylor Parks & Open Space - Structure 5 - Chicken Coop Barn

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 5 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029951

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
5-BF1-1	22029951-1	100	Gray Cinderblock with White Paint	ND			100	Q	N
5-BF1-2	22029951-2	100	Gray Cinderblock with White Paint	ND			100	Q	N
5-BF1-3	22029951-3	100	Tan Granular Plaster with White Paint	ND			100	Q	N
5-BF1-4	22029951-4	100	Tan Granular Plaster with White Paint	ND			100	Q	N
5-BF1-5	22029951-5	100	Tan Granular Plaster with White Paint	ND			100	Q	N
5-WG1-1	22029951-6A	40	Off-White Glazing with Red Paint	ND			100	C,B	N
	22029951-6B	60	Tan Wood	ND		100 CELL			N
5-WG1-2	22029951-7A	80	Off-White Glazing	ND			100	C,B	Y
	22029951-7B	20	Tan Wood	ND		100 CELL			N
5-RM1-1	22029951-8	100	Red/Black Shingle	ND		20 CELL	80	T,Q	N

Paul Knappe
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 5 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029951

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
5-RM1-2	22029951-9	100	Red/Black Shingle	ND		20 CELL	80	T,Q	N
5-RT1-1	**22029951-10**	**100**	**Black/Gray Fibrous Tar**	**CHRY**	**10**	**8 CELL**	**82**	**T**	**N**
5-RT1-2	22029951-11		POSITIVE STOP						
5-CMUP1-1	22029951-12A	10	Tan Resinous Material	ND			100	C	Y
	22029951-12B	**90**	**Black Fibrous Tar**	**CHRY**	**12**		**88**	**T**	**N**
5-CMUP1-2	22029951-13		POSITIVE STOP						

Paul Knappe
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP Lab Code 200860-0	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/8/2022
Attn:	Chris Lehman		Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 5 / E. 136th & Quebec St, Thornton, CO		Project ID:	22029951

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

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Client Name	DS Environmental Consulting	Date Collected:	6/7/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/11/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/12/2024
Attn:	Chris Lehman	Date Reported:	6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO	Project ID:	24020980

NVLAP® TESTING
NVLAP Lab Code 200860-0

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
2-CP1-1	24020980-1A	90	Gray Cementitious Material	ND			100	C	N
	24020980-1B	10	Off-White Granular Cementitious Material	ND			100	Q,C	N
5-TAR1-1	**24020980-2**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR1-2	**24020980-3**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-1	**24020980-4**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-2	**24020980-5A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-5B	5	Gray Granular Material with White Paint	ND			100	Q	N
5-CMUP2-1	**24020980-6**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-CMUP2-2	**24020980-7A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-7B	5	Gray Granular Material	ND			100	Q	N

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
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Q = Quartz
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Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
5-WINS1-1	24020980-8	100	Black/Gray Wrap	ND		80 CELL	20	T	N
5-WINS1-2	24020980-9A	80	Black/Gray Wrap	ND		80 CELL	20	T	N
	24020980-9B	20	Black Resinous Material	ND			100	B	N
6-TP1-1	24020980-10A	10	Black Tar	ND			100	T	Y
	24020980-10B	90	Black Felt	ND		60 CELL	40	T	N
6-TP1-2	24020980-11A	20	Black Tar	ND			100	T	Y
	24020980-11B	80	Black Felt	ND		60 CELL	40	T	N
6-TP2-1	24020980-12A	5	Black Tar	ND			100	T	Y
	24020980-12B	95	Black Felt	ND		60 CELL	40	T	N
6-TP2-2	24020980-13A	5	Black Tar	ND			100	T	Y

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

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Client Name	DS Environmental Consulting	Date Collected:	6/7/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/11/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/12/2024
Attn:	Chris Lehman	Date Reported:	6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO	Project ID:	24020980

NVLAP® TESTING
NVLAP Lab Code 200860-0

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Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
6-TP2-2	24020980-13B	95	Black Felt	ND		60 CELL	40	T	N
6-RS1-1	24020980-14	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RS1-2	24020980-15	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RP1-1	**24020980-16**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**
6-RP1-2	**24020980-17**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

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Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

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Aerobiology Client	DS Environmental Consulting, Inc.				
Field Contact	Chris Lehman	Collected By/Date: 7/29/22 MC		Relinquished By/Date: 7/29/22 MC	
Reporting Address		Relinquished By/Date:		Received By/Date: Pam 8-1-22 8am	
Billing Address	7555 W. 10th Ave, Lakewood, CO	Sampler Type	Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609	PO#/Job#:			
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group	Project Name: Aylor Property - Structure 5			
Routine x / 24 Hour / Same Day / 4 Hour / 2 Hour		Notes: E. 136th & Quebec St, Thornton, CO			
SAMPLING LOCATION ZIP CODE		CC Info: Analyze sets progressive			

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	5-BF1-1	3002		
2	1-2			
3	1-3		set	
4	1-4			
5	1-5			
6	5-W61-1		> set	
7	1-2			
8	5-RM1-1		> set	
9	1-2			
10	5-RT1-1		> set	
11	1-2			
12	5-CMU P1-1		> set	
13	1-2			
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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V: _____

Q: AW 8/9/2022

PER Chris - mm 6/12/24

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Page 1 of 2

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NVLAP AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.						
Field Contact	Chris Lehman				Collected By/Date: 6/7/24	Relinquished By/Date:	
Reporting Address					Relinquished By/Date:	Received By/Date: mm 6/11/24 4:34p	
Billing Address	7555 W. 10th Ave., Lakewood CO				Sampler Type: Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609				PO#/Job#:		
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group				Project Name: Aylor - 136th + Quebec, Thornton, CO		
Routine ☒	24 Hour ☒	Same Day ☐	4 Hour ☐	2 Hour ☐	Notes:		
SAMPLING LOCATION ZIP CODE					CC Info:		

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	2-CP1-1		Structure 2	
2	5-TAR1-1		Structure 5	
3	" 1-2			
4	5-TAR2-1			
5	" 2-2			
6	5-Cmup2-1			
7	" 2-2			
8	5-WINS 1-1			
9	" 1-2			
10	6-TP1-1		Structure 6	
11	1-2			
12	6-TP2-1			
13	2-2			
14	6-RS1-1			
15	1-2			

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- Swab/Tape
1050	Direct, Qualitative- Bulk
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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V: ———

Q: ERT 6/13/24

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Lab Use: 24020980

ELITE A — AZ, CA, CO, FL, GA, VA, NJ

NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
16	6-RP1-1	3007	Structure 6	
17	1 1-2	1	1 1	
18				
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21				
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"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 6 – Poultry Barn

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Front Range 7555 W 10th Ave
Suite A, Lakewood, CO 80214

Mountains PO Box 6864
Avon, CO 81620

Western Slope PO Box 3793
Aspen, CO 81612

Web dsconsultinginc.com

Direct (303) 286-9094

Fax (303) 986-0121

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The poultry barn, is a partially sub-grade single-story wood framed constructed building with corrugated metal roof/siding and dirt floor, the structure is approximately 6,160 square feet. The wood framing supports of the structure have partially collapsed.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C. ***This structure is a major asbestos spill, prior to any demolition the spill must be cleaned up following Regulation 8, Section III.T.***

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Black/Brown Fibrous Tar Paper (6-RP1) & (layer from 6-RM1)	Roof Under Metal Sheeting and Debris on Ground		~6,160 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the

suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		Material Locations Within Scope of Work **See Appendix B for Sample Location Map
Homogeneous Area 1 (6-CW1)	Red Canvas	· East and west entry doors **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (6-RM1)	**Black/Brown Fibrous Tar Paper and Multi-Layered Black/Brown Tar Felt Paper**	· Roofing underlayment below metal roof **// Black/Brown Fibrous Tar Paper 20% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 3 (6-TP1)	Thick Black Tar Felt Paper	· Roofing underlayment below metal roof (separated layers of RM1) **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (6-TP2)	Thin Black/Brown Tar Felt Paper Debris	· Debris on ground **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 5 (6-RS1)	Uninstalled Roof Shingle with Red/White Aggregate	· Interior, north center **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 6 (6-RP1)	**Black/Brown Fibrous Tar Paper**	· Roofing underlayment below metal roof (separated layers of RM1) · Debris on ground **// 40% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 6-CW1-1 Sample Location: West side entry doorway Sample ID: 6-CW1-2 Sample Location: West side entry doorway ***See Appendix B for Sample Location Map*	Description: **Red Canvas** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~65 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 6-RM1-1 Sample Location: Roof, west side Sample ID: 6-RM1-2 Sample Location: Roof, north side ***See Appendix B for Sample Location Map*	Description: **Black/Brown Fibrous Tar Paper and Multi-Layered Black/Brown Tar Felt Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~6,160 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	Black/Brown Fibrous Tar Paper 20% CHRY Felt Papers ND

HOMOGENEOUS AREA 3	Sample ID: 6-TP1-1 Sample Location: Roof, west side Sample ID: 6-TP1-2 Sample Location: Roof, west side center ***See Appendix B for Sample Location Map*	Description: **Thick Black Tar Felt Paper** Classification: Miscellaneous Material Condition: Damaged Quantity: ~6,160 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: 6-TP2-1 Sample Location: Debris on ground west center Sample ID: 6-TP2-2 Sample Location: Debris on ground west center ***See Appendix B for Sample Location Map*	Description: **Thin Black/Brown Tar Felt Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~120 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: 6-RS1-1 Sample Location: Debris on ground west center Sample ID: 6-RS1-2 Sample Location: Debris on ground west center ***See Appendix B for Sample Location Map*	Description: **Uninstalled Roof Shingle with Red/White Aggregate** Classification: Miscellaneous Material Condition: Damaged Quantity: ~8 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 6	Sample ID: 6-RP1-1 Sample Location: Roof, west side Sample ID: 6-RP1-2 Sample Location: Roof, west side center ***See Appendix B for Sample Location Map*	Description: **Black/Brown Fibrous Tar Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~6,160 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	40% CHRY

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. <u>TRACE does not mean it contains less than or equal to 1%.</u>

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***Black/brown fibrous tar paper was found to contain asbestos greater than 1% and the amount of significantly damaged friable ACM (~1,240 ft²) exceeded the trigger level of 160 ft². This structure is a major asbestos spill, prior to any demolition the spill must be cleaned up following III.T, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) friable roofing tar paper remaining on the roof system 2.) the significantly damaged debris and associated soils (~6,160 ft² of interior soil and ~5,690 ft² of exterior soil) on the ground that created the major spill.***

- ***This structure is partially collapsed and the remaining structure is deteriorating, a structural engineer is recommended to evaluate the structural stability to facilitate abatement.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are

not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which

the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

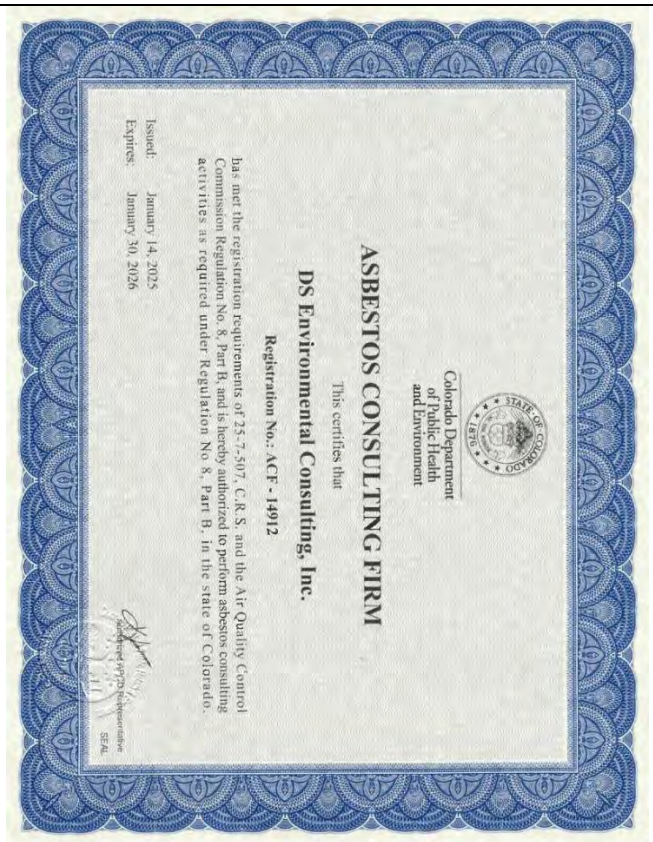
Expires: June 05, 2026

* 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

Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

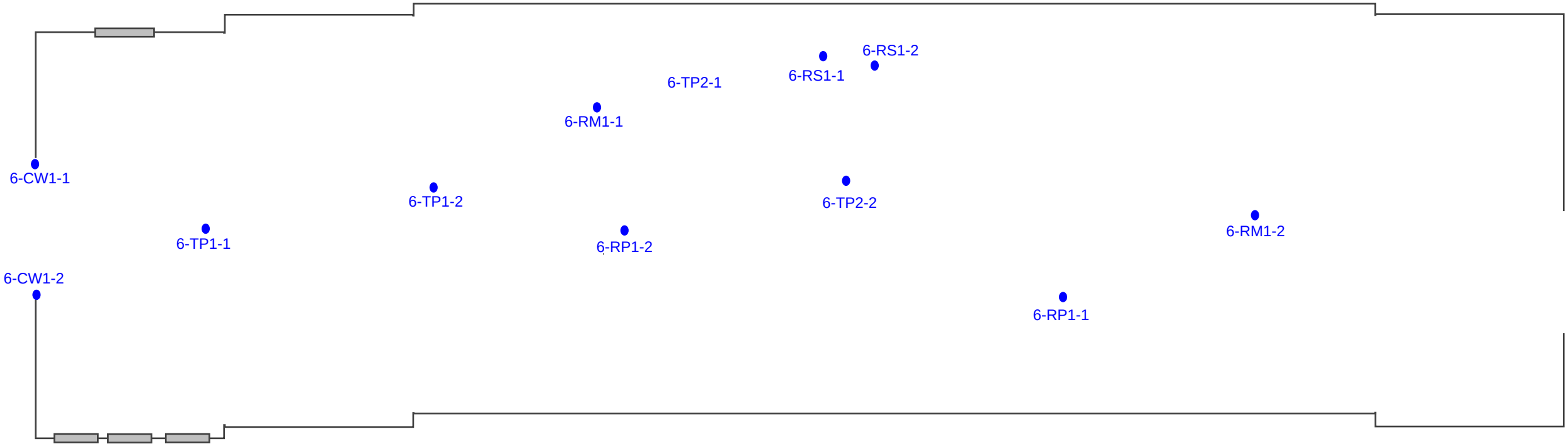
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

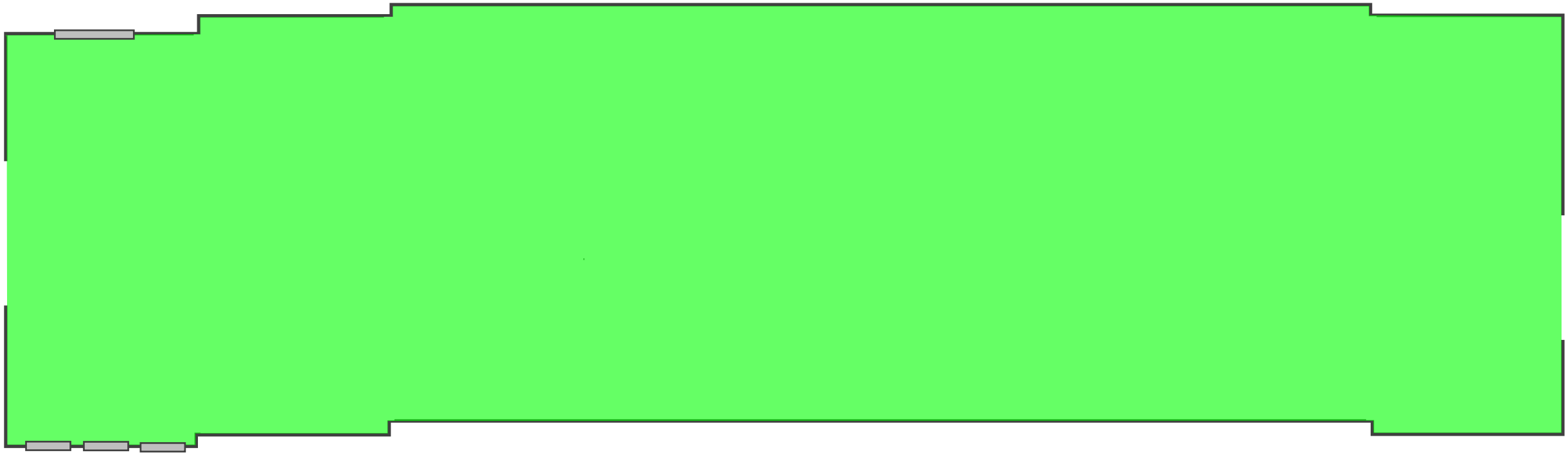
N

N.T.S.

Aylor Parks & Open Space - Structure 6 - Poultry Barn

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

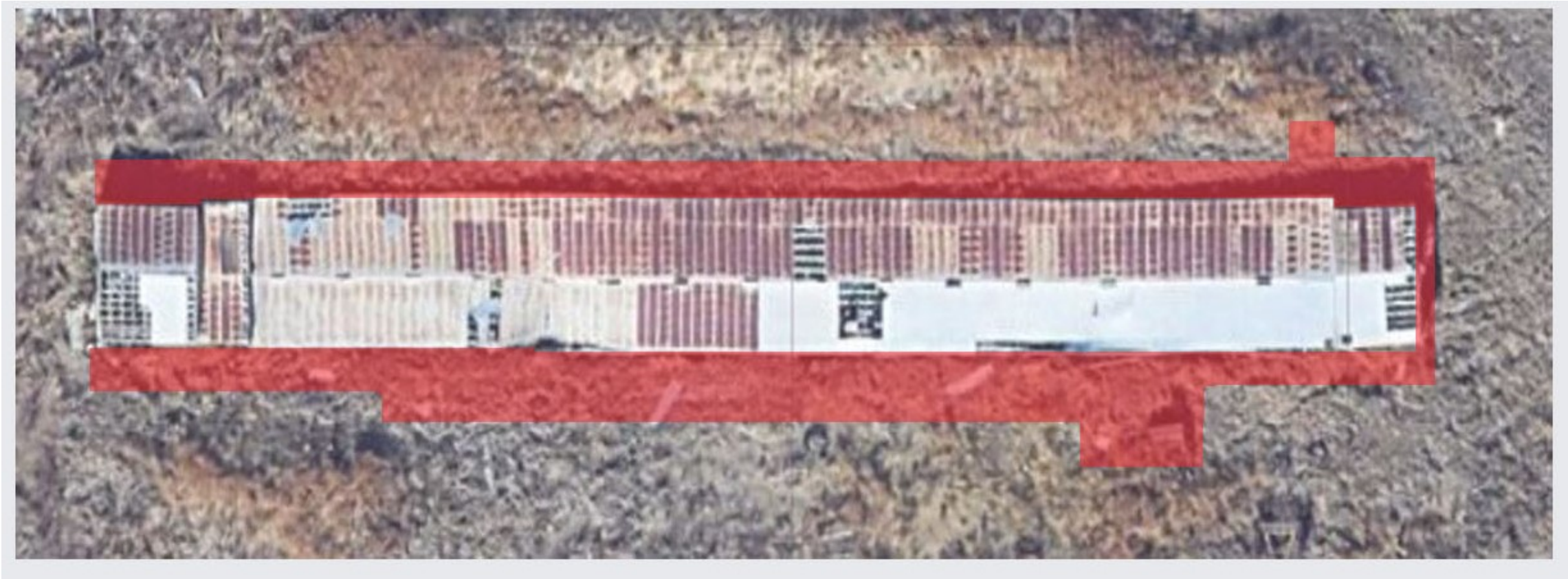
ACM Roof Tar Paper (6-RP1) & (6-RM1) and Interior Debris & Associated Soil

N

N.T.S.

Aylor Parks & Open Space - Structure 6 - Poultry Barn

DS Environmental CONSULTING



Key:

ACM Roof Tar Paper (6-RP1) & (6-RM1)

Exterior ACM Debris & Associated Soil

N

N.T.S.

Aylor Parks & Open Space - Structure 6 - Poultry Barn

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/27/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/4/2022
Attn:	Chris Lehman	Date Reported:	8/4/2022
Client Project Name:	Aylor Property - Structure 6 / NW Corner of 136th Ave & Quebec St.	Project ID:	22029642

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
6-CW1-1	22029642-1	100	Red/White Fibrous Material	ND		95 CELL	5		Y
6-CW1-2	22029642-2	100	Red/White Fibrous Material	ND		95 CELL	5		Y
6-RM1-1	**22029642-3A**	**35**	**Black Felt with Black Fibrous Material**	**CHRY**	**20**	**30 CELL,FG**	**50**	**T**	**N**
	22029642-3B	25	Brown Felt	ND		60 CELL	40	T	Y
	22029642-3C	15	Black Tar	ND			100	T	Y
	22029642-3D	25	Brown Felt	ND		60 CELL	40	T	Y
6-RM1-2	22029642-4		POSITIVE STOP						

Emily Thompson
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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780 Simms Street
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Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	7/27/2022
Street Address	7555 W. 10th Ave, Suite A		Date Received:	7/28/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/4/2022
Attn:	Chris Lehman	NVLAP Lab Code 200860-0	Date Reported:	8/4/2022
Client Project Name:	Aylor Property - Structure 6 / NW Corner of 136th Ave & Quebec St.		Project ID:	22029642

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- Composites are reported at client's request. Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition and sampling location, this ensures that Aerobiology knows that the drywall system can be composited. "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
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Golden, CO, 80401
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Certificate of Analysis

Client Name	DS Environmental Consulting	Date Collected:	6/7/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/11/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/12/2024
Attn:	Chris Lehman	Date Reported:	6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO	Project ID:	24020980

NVLAP® TESTING
NVLAP Lab Code 200860-0

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
2-CP1-1	24020980-1A	90	Gray Cementitious Material	ND			100	C	N
	24020980-1B	10	Off-White Granular Cementitious Material	ND			100	Q,C	N
5-TAR1-1	**24020980-2**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR1-2	**24020980-3**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-1	**24020980-4**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-TAR2-2	**24020980-5A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-5B	5	Gray Granular Material with White Paint	ND			100	Q	N
5-CMUP2-1	**24020980-6**	**100**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
5-CMUP2-2	**24020980-7A**	**95**	**Black Fibrous Tar**	**CHRY**	**10**		**90**	**T**	**N**
	24020980-7B	5	Gray Granular Material	ND			100	Q	N

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected

AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite

Q = Quartz
T = Tar
V = Vermiculite

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
5-WINS1-1	24020980-8	100	Black/Gray Wrap	ND		80 CELL	20	T	N
5-WINS1-2	24020980-9A	80	Black/Gray Wrap	ND		80 CELL	20	T	N
	24020980-9B	20	Black Resinous Material	ND			100	B	N
6-TP1-1	24020980-10A	10	Black Tar	ND			100	T	Y
	24020980-10B	90	Black Felt	ND		60 CELL	40	T	N
6-TP1-2	24020980-11A	20	Black Tar	ND			100	T	Y
	24020980-11B	80	Black Felt	ND		60 CELL	40	T	N
6-TP2-1	24020980-12A	5	Black Tar	ND			100	T	Y
	24020980-12B	95	Black Felt	ND		60 CELL	40	T	N
6-TP2-2	24020980-13A	5	Black Tar	ND			100	T	Y

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

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Certificate of Analysis

Client Name	DS Environmental Consulting	Date Collected:	6/7/2024
Street Address	7555 W. 10th Ave, Suite A	Date Received:	6/11/2024
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	6/12/2024
Attn:	Chris Lehman	Date Reported:	6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO	Project ID:	24020980

NVLAP® TESTING
NVLAP Lab Code 200860-0

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
6-TP2-2	24020980-13B	95	Black Felt	ND		60 CELL	40	T	N
6-RS1-1	24020980-14	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RS1-2	24020980-15	100	Pink/Gray Shingle	ND		25 CELL	75	Q,T	N
6-RP1-1	**24020980-16**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**
6-RP1-2	**24020980-17**	**100**	**Black Felt**	**CHRY**	**40**	**20 CELL,FG**	**40**	**T**	**N**

Nick Kuretich
Laboratory Analyst

Emily Thompson
Asbestos Lab Supervisor

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AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
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ND = None Detected

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CELL = Cellulose
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SYN = Synthetic
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W = Wollastonite

B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
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Q = Quartz
T = Tar
V = Vermiculite

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 6/7/2024
Street Address	7555 W. 10th Ave, Suite A	NVLAP® TESTING	Date Received: 6/11/2024
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 6/12/2024
Attn:	Chris Lehman		Date Reported: 6/13/2024
Client Project Name:	Aylor - 136th & Quebec, Thornton, CO		Project ID: 24020980

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be performed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distinguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

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Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave., Lakewood CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine ☒ / 24 Hour ☐ / Same Day ☐ / 4 Hour ☐ / 2 Hour ☐	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: JM 7/27/22
Relinquished By/Date:
Relinquished By/Date:
Received By/Date: MM 7/28/22
Sampler Type: Andersen ☐ SAS ☐ SampleAire ☐ AeroTrap ☐ Other ☐ BioCulture ☐
PO#/Job#:
Project Name: Aylor Property - NW corner of 136th Ave + Quebec St.
Notes: Structure 6-1
CC Info: Run samples Progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	6-CW1-1	3002	> set	
2	⊥ 1-2	⊥		
3	6-RM1-1	⊥	> set	
4	⊥ 1-2	⊥		
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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V: _____

Q: AW 8/4/2022

+

PER Chris - mm 6/12/24

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Page 1 of 2

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NVLAP AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.						
Field Contact	Chris Lehman				Collected By/Date: 6/7/24	Relinquished By/Date:	
Reporting Address					Relinquished By/Date:	Received By/Date: mm 6/11/24 4:34p	
Billing Address	7555 W. 10th Ave., Lakewood CO				Sampler Type: Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609				PO#/Job#:		
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group				Project Name: Aylor - 136th + Quebec, Thornton, CO		
Routine ☒	24 Hour ☒	Same Day ☐	4 Hour ☐	2 Hour ☐	Notes:		
SAMPLING LOCATION ZIP CODE					CC Info:		

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	2-CP1-1		Structure 2	
2	5-TAR1-1		Structure 5	
3	" 1-2			
4	5-TAR2-1			
5	" 2-2			
6	5-Cmup2-1			
7	" 2-2			
8	5-WINS 1-1			
9	" 1-2			
10	6-TP1-1		Structure 6	
11	1-2			
12	6-TP2-1			
13	2-2			
14	6-RS1-1			
15	1-2			

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- Swab/Tape
1050	Direct, Qualitative- Bulk
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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A: NM 6/12/24

V: ———

Q: ERT 6/13/24

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NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.		
Field Contact	Chris Lehman	Collected By/Date:	Relinquished By/Date:
Phone/Fax	720-369-6609	PO#/Job#:	
Email	chris@dsconsultinginc.com	Project Name:	

	Sample No.	Test Code	Sample Location	Total Volume/Area
16	6-RP1-1	3007	Structure 6	
17	1 1-2	1	1 1	
18				
19				
20				
21				
22				
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39				
40				

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 7 – Livestock Barn

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

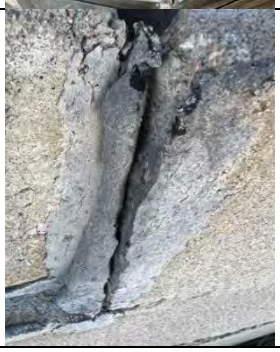
Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The livestock barn, is a single-story CMU constructed building with a wood framed/metal sheeted roof, approximately 1,000 square feet. The north side of the east CMU wall of the structure is collapsing on the west side of the building.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Light Grey/Off-White Window Glazing (7-WG2)	Uninstalled window sashes in the east room		~1 SF	**YES** – Friable
Black CMU Block Filler Patch Material (7-CMUP1)	Patches on CMU walls		~22 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		Material Locations Within Scope of Work **See Appendix B for Sample Location Map
Homogeneous Area 1 (7-WG1)	Off-White Window Glazing	Uninstalled window sashes in the east room, SE side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (7-WG2)	**Light Grey/Off-White Window Glazing**	· Uninstalled window sashes in the east room, NW and SE side **// 2% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 3 (7-TPB1)	Black Tar Roof Felt Debris	· Interior, east room **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (7-WINS1)	Brown/Black Resinous Wire Insulation with Brown Paper Insulation Sheathing	· Lighting supply wiring **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 5 (7-CMUP1)	Grey CMU Block Filler Patch Material	· Patches on CMU walls **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 6 (7-CMUP2)	**Black CMU Block Filler Patch Material**	· Patches on CMU walls **// 12% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**

Homogeneous Area 7 (7-BFD1)	Suspect Block Filler on CUM Debris	· CMU debris on NW side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 8 (7-RT1)	Black Tar Sealant	· Roof, electric pole penetration flashing **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 9 (7-WG3)	Off-White Window Glazing	· Uninstalled window sashes in the east room, SE side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 10 (7-WG4)	Exterior Grey Window Glazing	· Exterior windows **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 7-WG1-1 Sample Location: Interior, north room uninstalled window sashes, SE side Sample ID: 7-WG1-2 Sample Location: Interior, north room uninstalled window sashes, SE side ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 7-WG2-1 Sample Location: Interior, north room uninstalled window sashes, NW side Sample ID: 7-WG2-2 Sample Location: Interior, north room uninstalled window sashes, NW side ***See Appendix B for Sample Location Map*	Description: **Light Grey/Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	2% CHRY

HOMOGENEOUS AREA 3	Sample ID: 7-TPD1-1 Sample Location: Interior, north room floor NE center Sample ID: 7-TPD1-2 Sample Location: Interior, north room floor NE center ***See Appendix B for Sample Location Map*	Description: Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~ 12 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 4	Sample ID: 7-WINS1-1 Sample Location: Interior, north room light supply wiring Sample ID: 7-WINS1-2 Sample Location: Interior, center room light supply wiring ***See Appendix B for Sample Location Map*	Description: Classification: Miscellaneous Material Condition: Damaged Quantity: ~ 150 lineal feet Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: 7-CMUP1-1 Sample Location: Exterior, east side, north center Sample ID: 7-CMUP1-2 Sample Location: Exterior, east side, south center ***See Appendix B for Sample Location Map*	Description: Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~3 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 6	Sample ID: 7-CMUP2-1 Sample Location: Interior, south room, south wall Sample ID: 7-CMUP2-2 Sample Location: Interior, south room, east wall ***See Appendix B for Sample Location Map*	Description: **Black Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~82 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	12% CHRY

HOMOGENEOUS AREA 7	Sample ID: 7-BFD1-1 Sample Location: Exterior, north side debris on ground Sample ID: 7-BFD1-2 Sample Location: Exterior, NW side debris on ground Sample ID: 7-BFD1-3 Sample Location: Exterior, NW side debris on ground ***See Appendix B for Sample Location Map*	Description: Classification: Surfacing Material Condition: Significantly Damaged Quantity: ~63 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 8	Sample ID: 7-RT1-1 Sample Location: Roof NW side, electrical pole flashing boot flashing Sample ID: 7-RT1-2 Sample Location: Roof NW side, electrical pole flashing boot flashing ***See Appendix B for Sample Location Map*	Description: Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~2 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 1	Sample ID: 7-WG3-1 Sample Location: Interior, north room uninstalled window sashes, SE side center Sample ID: 7-WG3-2 Sample Location: Interior, north room uninstalled window sashes, SE side center ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 1	Sample ID: 7-WG4-1 Sample Location: Exterior east side, north window Sample ID: 7-WG4-2 Sample Location: Exterior east side, south window ***See Appendix B for Sample Location Map*	Description: **Exterior Grey Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and

analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. <u>TRACE does not mean it contains less than or equal to 1%.</u>

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged ACM present below the trigger levels (~28 sq. ft. of tar sealant and window glazing debris), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site, therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) friable window glazing and associated uninstalled sashes, and 2). interior and exterior CMU block patches 3.) the significantly damaged debris that created the spill and associated exterior soils (~660 ft²).***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with

subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

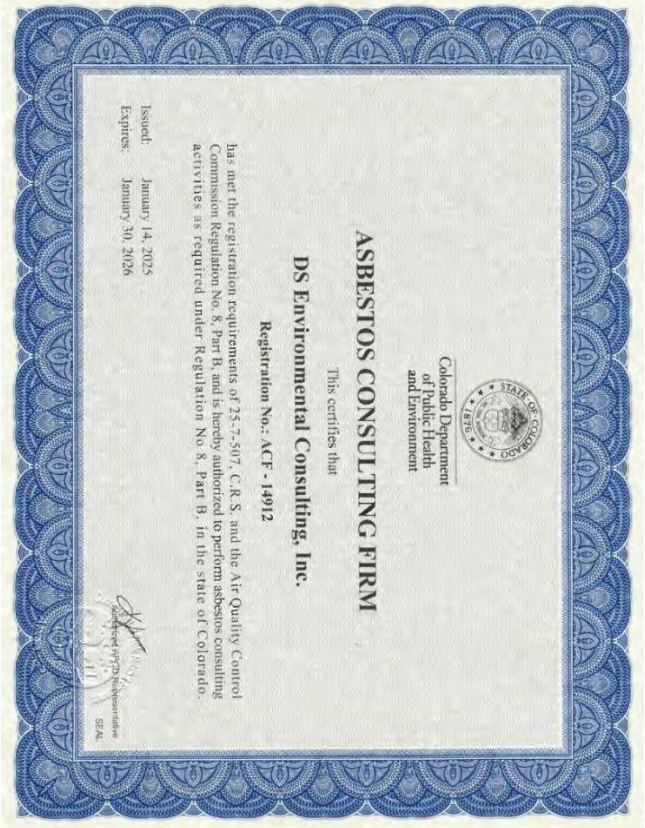
Expires: June 05, 2026

* 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

David Moss Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

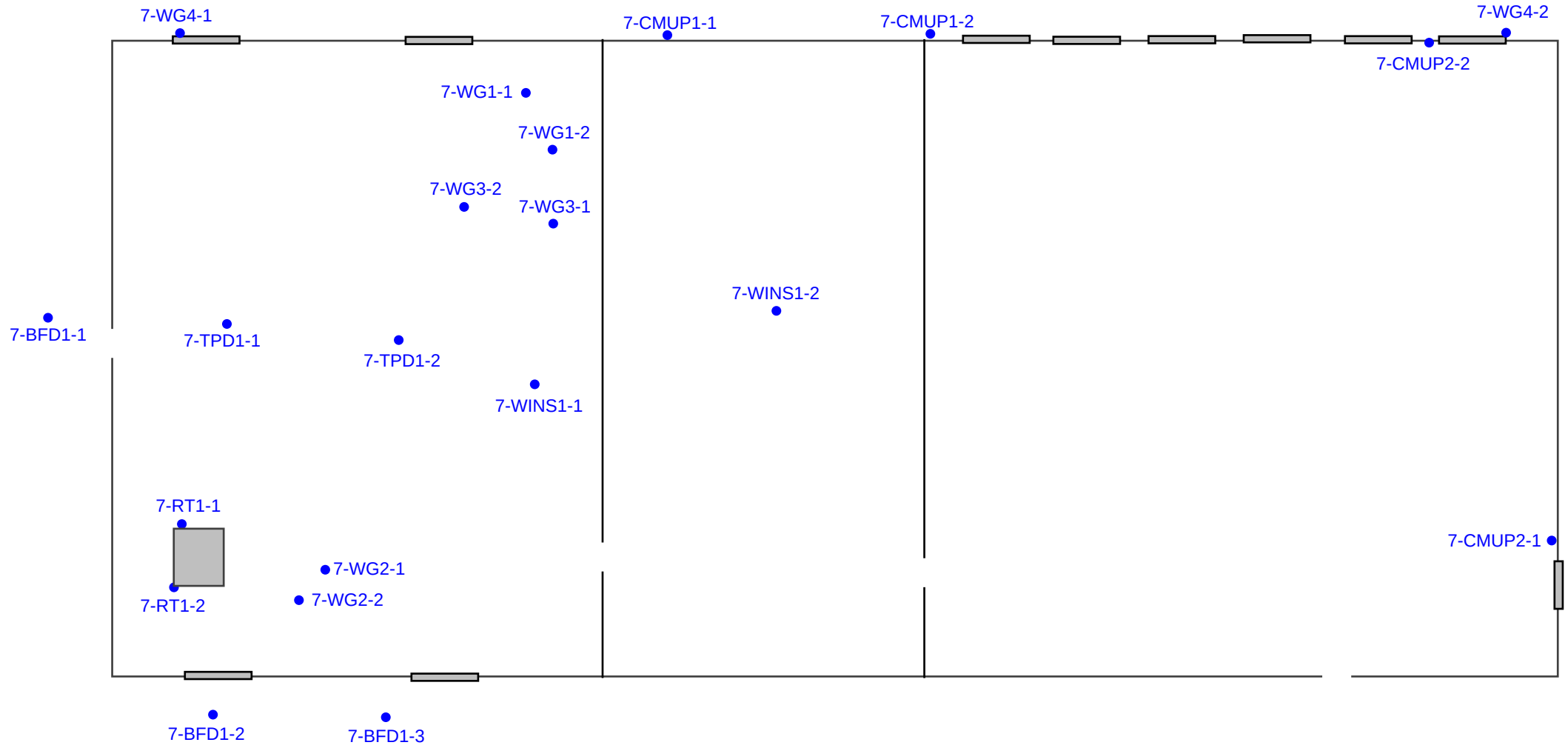
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

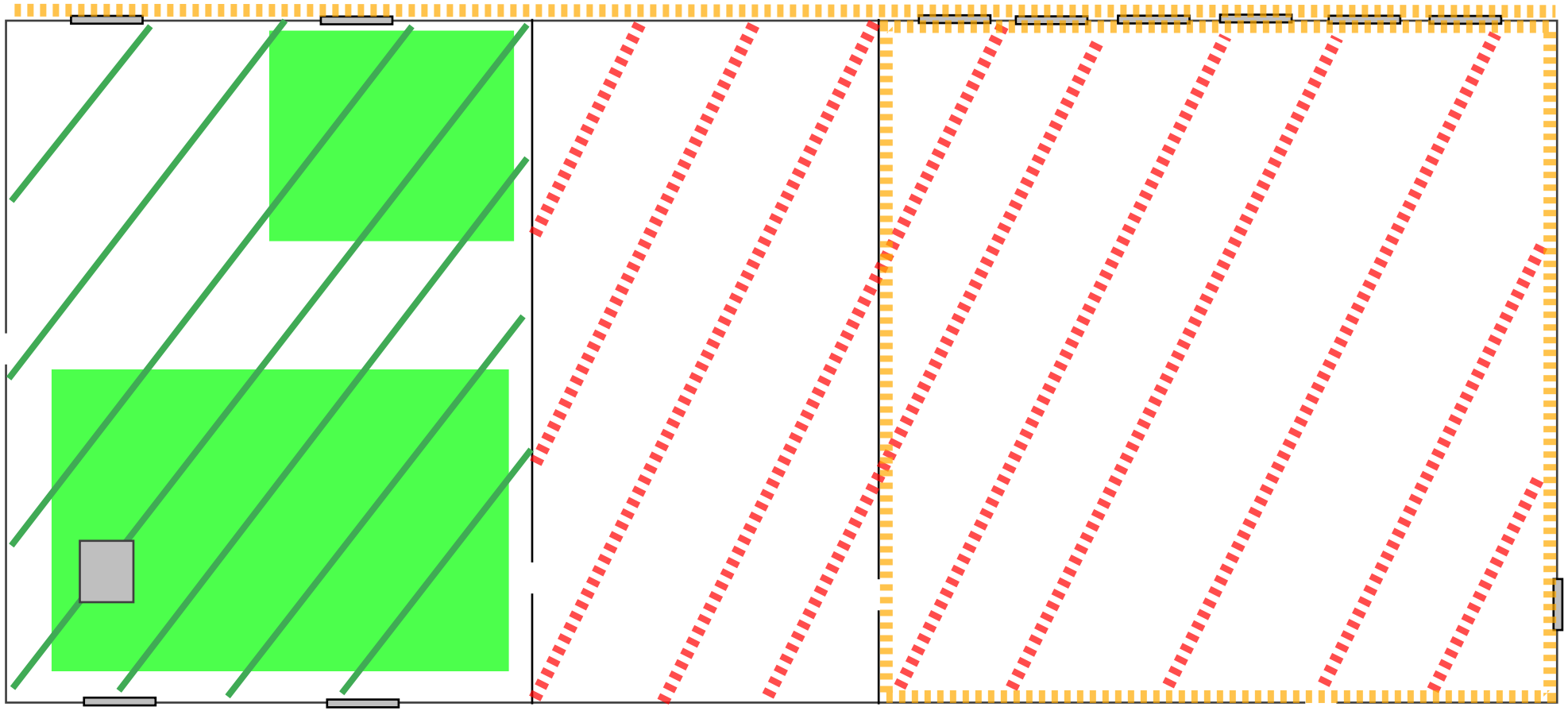
N

N.T.S.

Aylor Parks & Open Space - Structure 7 - Livestock Barn

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

- Grey Window Glazing on Sashes (7-WG2)
- CMU Wall Patch Tar (7-CMUP2)
- Window Glazing Debris (7-WG2)
- Tar Debris (7-CMUP2)

N

N.T.S.

Aylor Parks & Open Space - Structure 7 - Livestock Barn

DS Environmental CONSULTING

Key:

ACM Tar Sealant (7-CMUP2) in Exterior Soils

N

N.T.S.

Aylor Parks & Open Space - Structure 7 - Livestock Barn

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 7 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029977

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
7-WG1-1	22029977-1	100	Off-White/Brown Glazing with Gray Paint	ND			100	C	N
7-WG1-2	22029977-2	100	Off-White/Brown Glazing	ND			100	C	N
7-WG2-1	22029977-3	100	Gray/Brown Glazing	ND			100	C	N
7-WG2-2	**22029977-4**	**100**	**Gray Glazing**	**CHRY**	**2**		**98**	**C**	**Y**
7-TPD1-1	22029977-5	100	Brown Felt with Black Tar	ND		60 CELL	40	T	N
7-TPD1-2	22029977-6	100	Brown Felt with Black Tar	ND		60 CELL	40	T	N
7-WINS1-1	22029977-7A	40	Brown Tar Paper	ND		70 CELL	30	T	N
	22029977-7B	60	Brown Fibrous Material with Black Tar	ND		65 CELL	35	T	N
7-WINS1-2	22029977-8A	40	Brown Tar Paper	ND		70 CELL	30	T	N
	22029977-8B	60	Brown Fibrous Material with Black Tar	ND		65 CELL	35	T	N

Emily Thompson
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/8/2022
Attn:	Chris Lehman	Date Reported:	8/9/2022
Client Project Name:	Aylor Property - Structure 7 / E. 136th & Quebec St, Thornton, CO	Project ID:	22029977

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
7-CMUP1-1	22029977-9A	8	Off-White Granular Cementitious Material	ND			100	Q	N
7-CMUP1-1	22029977-9B	92	Gray Granular Cementitious Material	ND			100	Q	N
7-CMUP1-1 (Labeled as 7-CMUP2-1)	**22029977-10**	**100**	**Black Fibrous Tar with Tan Granular Material**	**CHRY**	**12**		**88**	**T,Q**	**N**
7-CMUP1-2 (Labeled as 7-CMUP2-2)	22029977-11		POSITIVE STOP						
7-BFD1-1	22029977-12A	50	Off-White Granular Cementitious Material with Gray Paint	ND			100	Q	N
	22029977-12B	50	Gray Granular Cementitious Material	ND			100	Q	N
7-BFD1-2	22029977-13A	25	Off-White Granular Cementitious Material with Gray Paint	ND			100	Q	N
	22029977-13B	75	Gray Granular Cementitious Material	ND			100	Q	N
7-BFD1-3	22029977-14A	33	Off-White Granular Cementitious Material with Gray Paint	ND			100	Q	N
	22029977-14B	67	Gray Granular Cementitious Material	ND			100	Q	N

Emily Thompson
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/8/2022
Attn:	Chris Lehman		Date Reported: 8/9/2022
Client Project Name:	Aylor Property - Structure 7 / E. 136th & Quebec St, Thornton, CO		Project ID: 22029977

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
7-RT1-1	22029977-15	100	Black Fibrous Tar	ND		15 CELL	85	T	N
7-RT1-2	22029977-16	100	Black Fibrous Tar	ND		15 CELL	85	T	N

Emily Thompson
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/8/2022
Attn:	Chris Lehman		Date Reported: 8/9/2022
Client Project Name:	Aylor Property - Structure 7 / E. 136th & Quebec St, Thornton, CO		Project ID: 22029977

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- Composites are reported at client's request. Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition and sampling location, this ensures that Aerobiology knows that the drywall system can be composited. "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

Lab Use: 22029477

Page 1 of 1

AZ, CA, CO, FL, GA, VA, NJ | AZ, CA, CO, VA | AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine (x) / 24 Hour / Same Day / 4 Hour / 2 Hour	x / / / /
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 | Relinquished By/Date: 7/29/22

Relinquished By/Date: | Received By/Date: PAM 8-1-22 8AM

Sampler Type: Andersen ☐ SAS ☐ | SampleAire ☐ AeroTrap ☐ | Other ☐ BioCulture ☐

PO#/Job#:

Project Name: Aylor Property - Structure 7

Notes: E. 136th & Quebec St, Thornton, CO

CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	7-WG1-1	3002	} set	
2	1-2	↓		
3	7-WG2-1		} set	
4	2-2			
5	7-TPD1-1		} set	
6	1-2			
7	7-WINS1-1		} set	
8	1-2			
9	7-CMUP1-1		} set	
10	7-CMUP1-1*		} set * Labeled as 7-CMUP2-1	
11	1-2*		" 2-2 ERT	8/8/22
12	7-BFD 1-1		} set	
13	1-2			
14	1-3	↓		
15	7-RT 1-1 / 7-RT 1-2	3002 / 3002	set	
16				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY (+)

A: ERT 1-8 ✓ TH 9-16 ✓ 8/8/22

V: _____

Q: AW 8/9/2022

Washington, D.C. (877) 648-9150 | Atlanta, GA (770) 947-2828 | Denver, CO (303) 232-3746 | Ph (60

eurofins | Built Environment Testing Reservoirs

July 05, 2024

Subcontractor Number:
Laboratory Report: **RES 607916-1**
Project #/P.O. #: **None Given**
Project Description: **Aylor Property - 136th Ave. & Qubec, Thornton, CO**

Chris Lehman
DS Environmental Consulting, Inc.
7555 W. 10th Ave. Suite A
Lakewood CO 80214

Dear Chris,

Eurofins Reservoirs 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 LAP, LLC), Lab ID 101533 for Phase Contrast Microscopy (PCM) analysis. This laboratory is currently proficient in both Proficiency Testing and PAT programs respectively.

Eurofins Reservoirs 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 607916-1 is the job number assigned to this study. This report is considered highly confidential and the sole property of the customer. Eurofins Reservoirs 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, as received and with the information provided by the customer. 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 Eurofins Reservoirs. 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
by Daniel Erhard

Jeanne Spencer
President

DATA QA
07/05/2024

EUROFINS RESERVOIRS ENVIRONMENTAL, INC

NVLAP Lab Code 101896-0
AIHA LAP, LLC. LAB ID 101533

TABLE: I ANALYSIS: PLM BULK ANALYSIS, PERCENTAGE COMPOSITION BY VOLUME

RES Job Number: **RES 607916-1**
Client: **DS Environmental Consulting, Inc.**
Client Project/P.O.: **None Given**
Client Project Description: **Aylor Property - 136th Ave. & Qubec, Thornton, CO**
Date Samples Received: **July 05, 2024**
Analysis Type: **EPA 600/R-93/116 - Short Report, Bulk**
Turnaround: **Rush**
Date Samples Analyzed: **July 05, 2024**

NA = Not Analyzed
NR = Not Received
ND = None Detected
TR = Trace; <1 % Visual Estimate
Trem-Act = Tremolite-Actinolite

Laboratory Sample ID / Client Sample Number	LAYER	Physical Description	Sub Part (%)	Asbestos Content: Mineral	Asbestos Content: Visual Estimate (%)	Non-Asbestos Fibrous Components (%)	Non-Fibrous Components (%)
607916 - 7-WG3-1	A	Off white glazing	100		ND	0	100
607916 - 7-WG3-2	A	Off white glazing w/ black paint	100		ND	0	100
607916 - 7-WG4-1	A	Gray glazing	100		ND	0	100
607916 - 7-WG4-2	A	Gray glazing	100		ND	0	100

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

Daniel Erhard
Analyst

eurofins | Built Environment Testing Reservoirs

RES Job #: 607916

SUBMITTED BY		INVOICE TO		CONTACT INFORMATION		SERIES
Company:	DS Environmental Consulting, Inc.	Company:	DS Environmental Consulting, Inc.	Contact:	Chris Lehman	-1 PLM Rush *NO VERBALS*
Address:	7555 W. 10th Ave. Suite A	Address:	7555 W. 10th Ave. Suite A	Phone:	(720) 369-6609	
				Fax:		
	Lakewood, CO 80214		Lakewood, CO 80214	Cell:	(720) 369-6609	
Project Number and/or P.O. #:	None Given			Final Data Deliverable Email Address:		
Project Description/Location:	Aylor Property - 136th Ave. & Qubec, Thornton, CO			chris@dsconsultinginc.com (+ 8 ADDNL. CONTACTS)		

ASBESTOS LABORATORY HOURS: Weekdays: 7am - 7pm & Sat. 8am - 5pm

PLM / PCM / TEM DTL RUSH PRIORITY STANDARD

CHEMISTRY LABORATORY HOURS: Weekdays: 8am - 5pm

Dust RUSH PRIORITY STANDARD

Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT

Organics* SAME DAY RUSH PRIORITY STANDARD

MICROBIOLOGY LABORATORY HOURS: Weekdays: 8am - 5pm

Viable Analysis** PRIORITY STANDARD **TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH

Medical Device Analysis RUSH STANDARD

Mold Analysis RUSH PRIORITY STANDARD

****Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.****

Special Instructions:

REQUESTED ANALYSIS

VALID MATRIX CODES

Air = A | Bulk = B
Dust = D | Food = F
Paint = P | Soil = S
Surface = SU | Swab = SW
Tape = T | Wipe = W
Drinking Water = DW
Waste Water = WW
ASTM E1792 approved wipe media only

Client Sample ID Number (Sample ID's must be unique)	ASBESTOS: PLM - PLM Short Report (EPA/600/R-93/116)	ASBESTOS: TEM - AHERA (+/- or Quantified), Microvac (+/- or Quantified), Wipe (+/- or Quantified), NIOSH 7402, Yamate Level II, ISO 10312, ISO 13794, Chatfield, Drinking Water, Waste Water, Bulk +/-. CARB Modified Ahera	ASBESTOS: PCM - 7400A, 7400B, OSHA	CHEMISTRY: DUST - Total, Respirable	CHEMISTRY: METALS - Analyte(s) Lead Only (7082, 7420, Waste Water, Foodware), Multi Metals (7303,6020A, 200.8, Waste Water, Foodware, OSHA ID-125G), pH (Liquid or Non-Liquid), TCLP, RCRA 8 Scan, Welding Fume Scan, Full Metals Scan	CHEMISTRY: ORGANICS - Methamphetamine, TSS	MICROBIOLOGY: VIABLES - Campylobacter, Bacillus, Salmonella (Culturable or 1-2), Listeria, E. coli O157:H7, E. coli/Coliforms - Plated, S.aureus, Yeast & Mol, Aerobic Plate Count, Coliforms/E. coli - (State Water, Drinking Water, Non-Drinking Water, +/-, Quantification), Lactic Acid, Viable Microbial Count (w/oID or w/ID), Enterococcus (+/- or Quantification), Legionella (P, NP, C)	MICROBIOLOGY: MEDICAL - Bioburden, LAL	MICROBIOLOGY: MOLD - Spore Trap, Bulk Mold, Particulate Identification	ICO	Sample Volume (L) / Area	Length(or Aliquots) x Width(or Area per Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm	Laboratory Analysis Instructions
1 7-WG3-1	X											B				PROG(A)
2 7-WG3-2	X											B				PROG(A)
3 7-WG4-1	X											B				PROG(B)
4 7-WG4-2	X											B				PROG(B)

EREI establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number.
EREI 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:		Chris Lehman	Date/Time: 07/05/2024 14:03:32	Sample Condition: Acceptable
Received By:		Jessica Parker	Date/Time: 07/05/2024 14:04:27	Carrier: Hand

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 8 – Livestock Lean-To

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural building detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The livestock lean-to, is a 3-sided wind shelter structure constructed of unfinished CMU block. There is a dirt floor, no roof and the structure has a foot-print of approximately 1,280 sq. ft.

Summary of Findings

The asbestos inspection detailed in this report did not identify ACM(s) that require professional abatement activities prior to the demolition of the structure.

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (8-CMU1)	Unfinished CMU Block and Associated Mortar	· North, west and east walls **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

	ACRONYMS	ACM ASSESSMENT CATEGORIES
SUMMARY OF FINDINGS	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information ****See Appendix B for Sample Location Map**	**Material Information**	**Asbestos Content**
HOMOGENEOUS AREA 1	Sample ID: 8-CMU1-1 Sample Location: South wall Sample ID: 8-CMU1-2 Sample Location: North wall ***See Appendix B for Sample Location Map*	Description: **Unfinished CMU Block and Associated Mortar** Classification: Miscellaneous Material Condition: Good Quantity: ~1,180 ft^2 Friability: Non-Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. <u>TRACE does not mean it contains less than or equal to 1%.</u>

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance

of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did not identify ACM(s), therefore no professional abatement activities are required prior to the demolition of the structure.

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)

- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

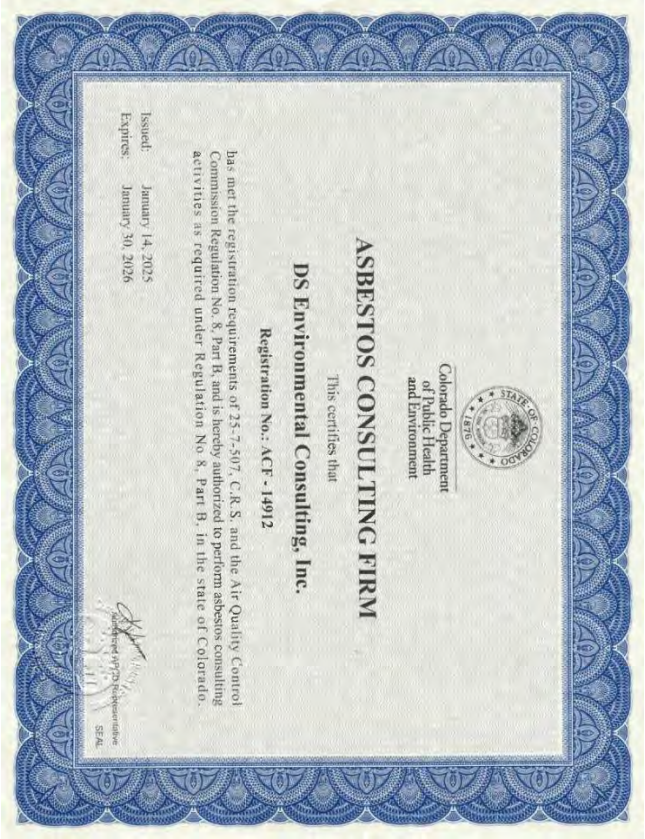
Expires: June 05, 2026

* 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

David Moss 2025 Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS

Key:

N

N.T.S.

Aylor Parks & Open Space - Structure 8 - Livestock Lean-To

DS Environmental CONSULTING

APPENDIX C: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 8 / E. 136th & Quebec St, Thornton, CO	Project ID:	22030309

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
8-CMU1-1	22030309-1A	90	Tan-Gray Cementitious Material	ND			100	Q	N
	22030309-1B	10	Gray Granular Material	ND			100	Q	N
8-CMU1-2	22030309-2A	80	Tan-Gray Cementitious Material	ND			100	Q	N
	22030309-2B	20	Gray Granular Material	ND			100	Q	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/5/2022
Attn:	Chris Lehman		Date Reported: 8/8/2022
Client Project Name:	Aylor Property - Structure 8 / E. 136th & Quebec St, Thornton, CO		Project ID: 22030309

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

Lab Use: 22030309

Page 1 of 1

AZ, CA, CO, FL, GA, VA, NJ | AZ, CA, CO, VA | AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.				
Field Contact	Chris Lehman	Collected By/Date: 7/29/22		Relinquished By/Date: 7/29/22	
Reporting Address		Relinquished By/Date:		Received By/Date: Pam 8-1-22	
Billing Address	7555 W. 10th Ave, Lakewood, CO	Sampler Type	Andersen ☐ SAS ☐	SampleAire ☐ AeroTrap ☐	Other ☐ BioCulture ☐
Phone/Fax	720-369-6609	PO#/Job#:			
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group	Project Name: Aylor Property - Structure 8			
Routine ☒ / 24 Hour ☐ / Same Day ☐ / 4 Hour ☐ / 2 Hour ☐		Notes: E. 136th & Quebec St, Thornton, CO			
SAMPLING LOCATION ZIP CODE		CC Info: Analyze sets progressive			

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	8-CMU1-4	3002	} set	
2	1 1-2	1		
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY ND

A: AG 8/5/22

V: ———

Q: AW 8/8/2022

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PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 9 – Feed Shed

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural sub-grade storage cellar detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The feed shed, is a wood framed constructed structure with metal roofing, the structure is approximately 240 square feet and it was used as a feed storage shed.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Off-White Fibrous Paper (9-DW1)	Bottom of propane burner stands and debris on interior		~4 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		Material Locations Within Scope of Work **See Appendix B for Sample Location Map
Homogeneous Area 1 (9-WG1)	Off-White Window Glazing	· Uninstalled window sashes on interior **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 2 (9-DW1)	**Off-White Fibrous Paper**	· Bottom of propane burner stands and debris on interior **// 75% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 3 (9-RS1)	Uninstalled Roofing Shingles with Red/Green Aggregate	· Interior SE side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 4 (9-TP1)	Uninstalled Tar Felt Paper	· Interior NW side **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 5 (9-RF1)	Roofing Tar Felt Paper	· Roof under wood shingles **// No Asbestos Detected //** **// May Remain for Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 9-WG1-1 Sample Location: Interior, uninstalled window sash, south side center Sample ID: 9-WG1-2 Sample Location: Interior, uninstalled window sash, south side center ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 2	Sample ID: 7-DW1-1 Sample Location: Interior, propane burner pan, south side center Sample ID: 7-DW1-2 Sample Location: Interior, debris, south side center ***See Appendix B for Sample Location Map*	Description: **Off-White Fibrous Paper** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~15 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	75% CHRY
HOMOGENEOUS AREA 3	Sample ID: 9-RS1-1 Sample Location: Interior, uninstalled shingles, SE side Sample ID: 9-RS1-2 Sample Location: Interior, uninstalled shingles, SE side ***See Appendix B for Sample Location Map*	Description: **Uninstalled Roofing Shingles with Red/Green Aggregate** Classification: Miscellaneous Material Condition: Damaged Quantity: ~120 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

HOMOGENEOUS AREA 4	Sample ID: 9-TP1-1 Sample Location: Interior, uninstalled felt paper, NW side Sample ID: 9-TP1-2 Sample Location: Interior, uninstalled felt paper, NW side ***See Appendix B for Sample Location Map*	Description: **Uninstalled Tar Felt Paper** Classification: Miscellaneous Material Condition: Damaged Quantity: ~160 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 5	Sample ID: 9-RF1-1 Sample Location: Roof, west center Sample ID: 9-RF1-2 Sample Location: Roof, east center ***See Appendix B for Sample Location Map*	Description: **Uninstalled Roofing Tar Felt Paper** Classification: Miscellaneous Material Condition: Damaged Quantity: ~210 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each
- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged ACM present below the trigger levels (~15 sq. ft. of off-white fibrous paper), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site, therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) off-white fibrous paper and associated debris throughout the interior.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)

- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager
A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

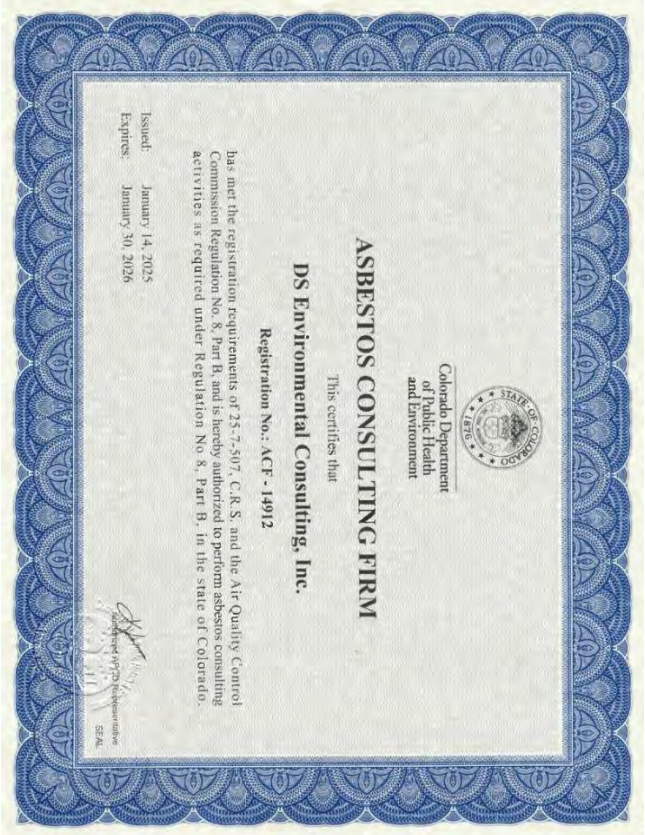
Expires: June 05, 2026

* 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

David Moss 2025 Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

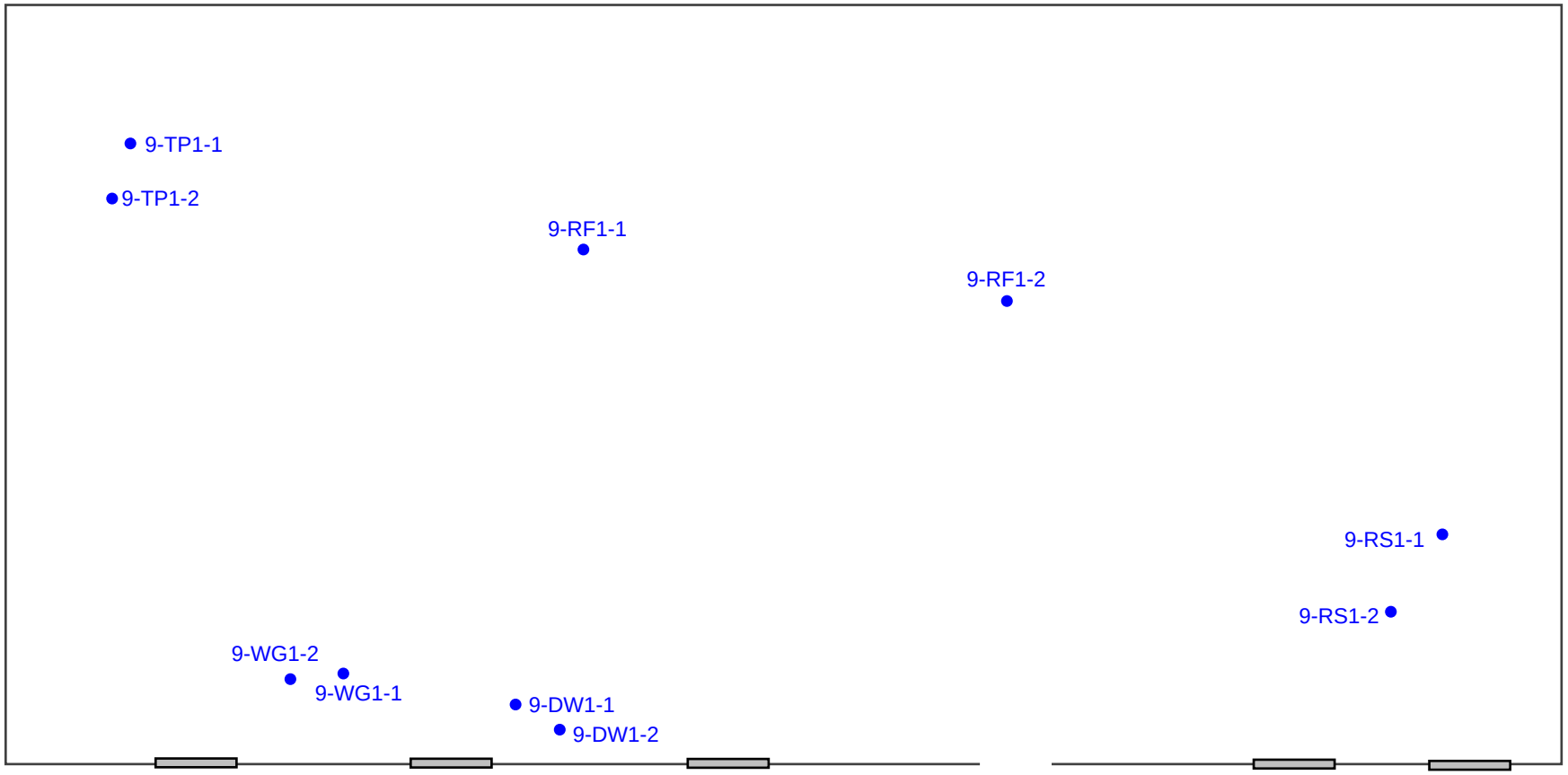
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

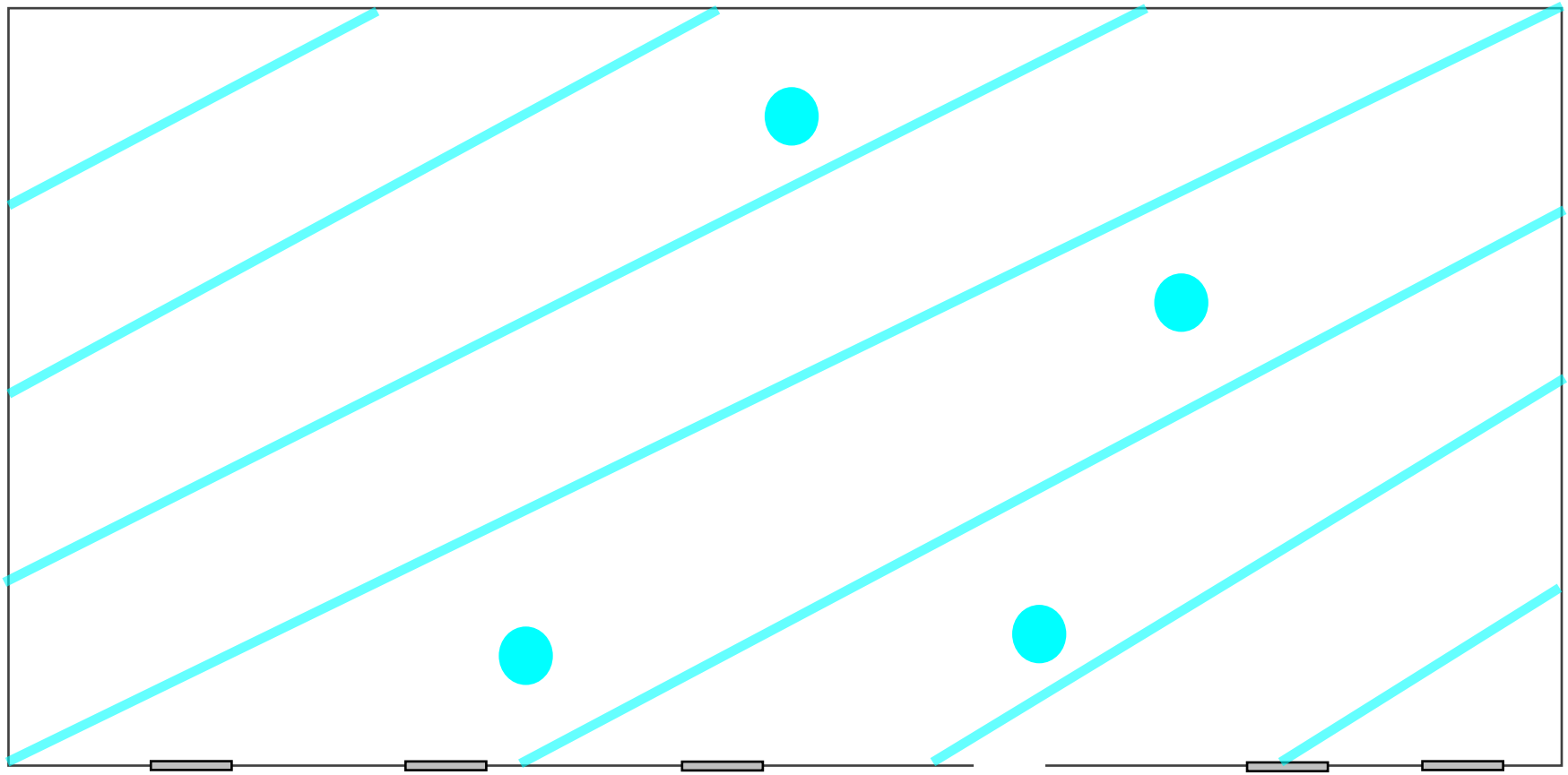
N

N.T.S.

Aylor Parks & Open Space - Structure 9 - Feed Shed

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Fibrous Paper on Burner (9-DW1)

Fibrous Paper Debris (9-DW1)

N

N.T.S.

Aylor Parks & Open Space - Structure 9 - Feed Shed

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 9 / E. 136th & Quebec St, Thornton, CO	Project ID:	22030315

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
9-WG1-1	22030315-1	100	Off-White Glazing	ND			100		Y
9-WG1-2	22030315-2	100	Off-White Glazing	ND			100		Y
9-DW1-1	**22030315-3**	**100**	**Gray Fibrous Material**	**CHRY**	**75**	**10 CELL**	**15**		**N**
9-DW1-2	22030315-4		POSITIVE STOP						
9-RS1-1	22030315-5	100	Brown/Green Shingle	ND		60 CELL	40	T,M	N
9-RS1-2	22030315-6	100	Brown/Green Shingle	ND		60 CELL	40	T,M	N
9-TP1-1	22030315-7	100	Gray Felt	ND		95 CELL,AH	5		N
9-TP1-2	22030315-8	100	Gray Felt	ND		95 CELL	5		N
9-RF1-1	22030315-9	100	Black Felt	ND		80 CELL,AH	20	T	N
9-RF1-2	22030315-10	100	Black Felt	ND		80 CELL,AH	20	T	N

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite
AM = Amosite
AN = Anthophyllite
CHRY = Chrysotile
CR = Crocidolite
TRM = Tremolite
Tr = Trace
ND = None Detected
AH = Animal Hair
CELL = Cellulose
FG = Fibrous Glass
MW = Mineral Wool
OT = Other
SYN = Synthetic
TL = Talc
W = Wollastonite
B = Binder
C = Calcite
D = Diatoms
G = Gypsum
M = Mica
OR = Organic
OP = Opaques
P = Perlite
Q = Quartz
T = Tar
V = Vermiculite

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780 Simms Street
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Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting	NVLAP TESTING	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A		Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214		Date Analyzed:	8/5/2022
Attn:	Chris Lehman	NVLAP Lab Code 200860-0	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 9 / E. 136th & Quebec St, Thornton, CO		Project ID:	22030315

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

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Lab Use: 22030315

Page (of)

ELITE Program — AZ, CA, CO, FL, GA, VA, NJ

NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine [x] / 24 Hour [ ] / Same Day [ ] / 4 Hour [ ] / 2 Hour [ ]	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 MM
Relinquished By/Date: 7/29/22 MM
Relinquished By/Date:
Received By/Date: PDM 8.1.22 8am
Sampler Type: Andersen [ ] SAS [ ] SampleAire [ ] AeroTrap [ ] Other [ ] BioCulture [ ]
PO#/Job#:
Project Name: Aylor Property - Structure 9
Notes: E. 136th & Quebec St, Thornton, CO
CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	9-WGH	3002		
2	L 1-2			
3	9-DWH			
4	1-2			
5	9-RSH			
6	1-2			
7	9-TPH			
8	1-2			
9	9-RFH			
10	1-2			
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

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LAB USE ONLY

A: AG 8/5/22

V: _____

Q: AW 8/8/2022

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 10 – Grain Silo

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural sub-grade storage cellar detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The grain silo, is a sheet metal constructed structure with metal roofing and metal pan floor, the structure is approximately 150 square feet and it was used to store grains.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Black Granular Tar Sealant (10-ASP1)	Seam of metal walls and metal pan around bottom perimeter		~42 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.
- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		Material Locations Within Scope of Work **See Appendix B for Sample Location Map
Homogeneous Area 1 (10-ASP1)	**Black Granular Tar Sealant**	· Seam of metal walls and metal pan around bottom perimeter **// 3% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

	Sample Information **See Appendix B for Sample Location Map	Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 10-ASP1-1 Sample Location: Exterior base seam, east side Sample ID: 10-ASP1-2 Sample Location: Exterior base seam, east side ***See Appendix B for Sample Location Map*	Description: **Black Granular Tar Sealant** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~44 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	3% CHRY

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each

- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged ACM present below the trigger levels (~44 sq. ft. of tar sealant), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site, therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) black granular tar sealant at the base seam of metal walls and metal pan around the bottom perimeter.***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work

practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

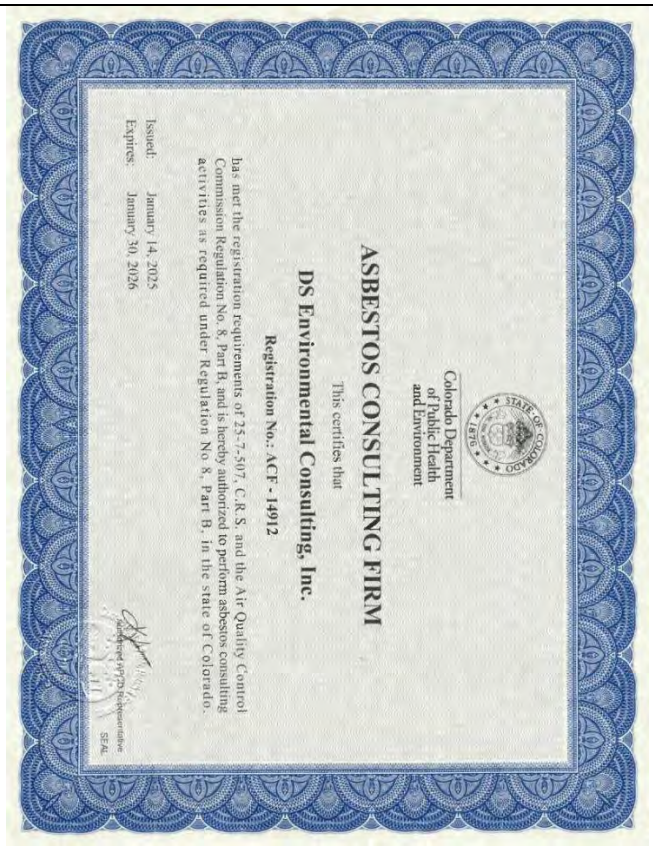
Expires: June 05, 2026

* 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

David Moss 2025 Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

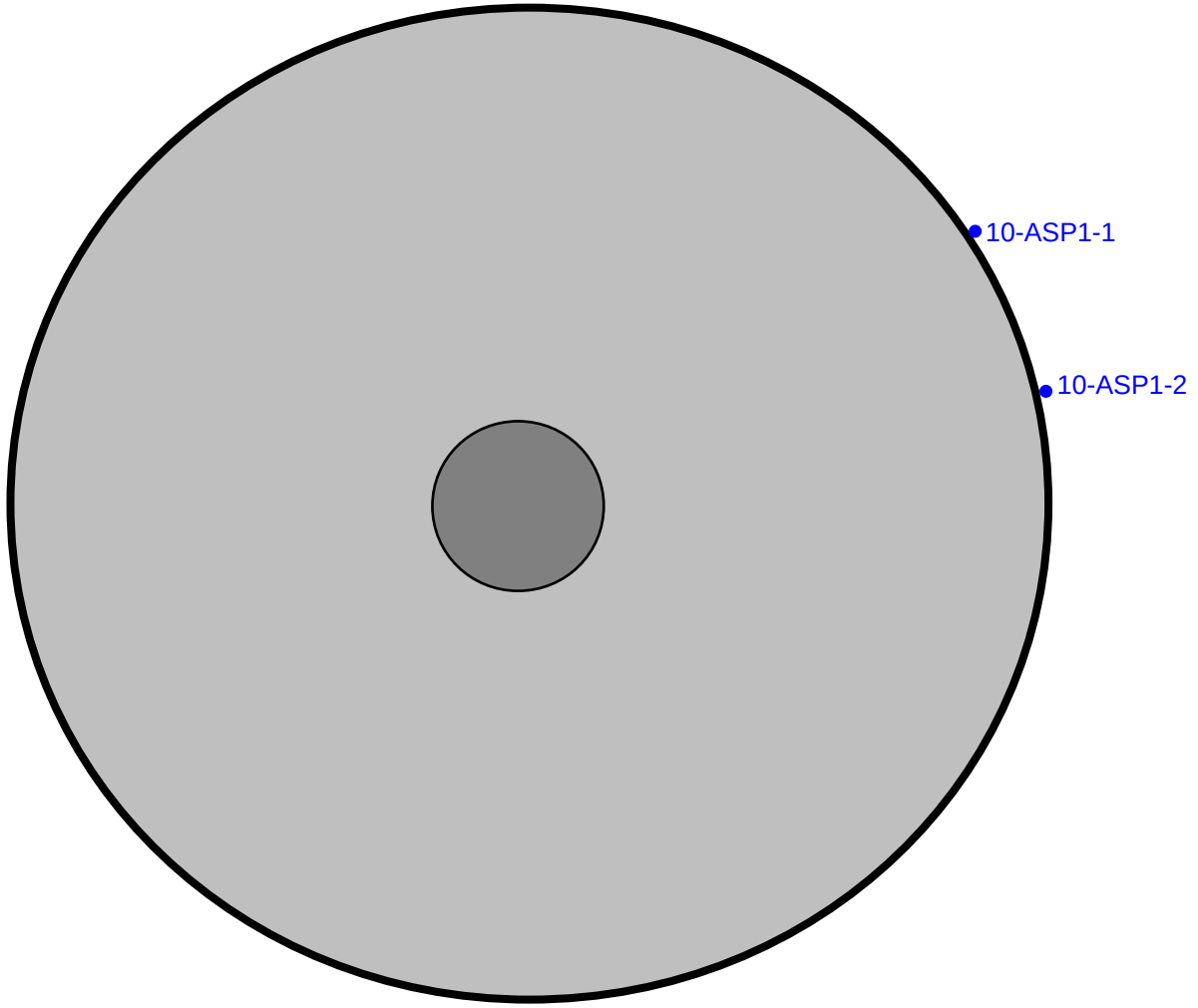
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

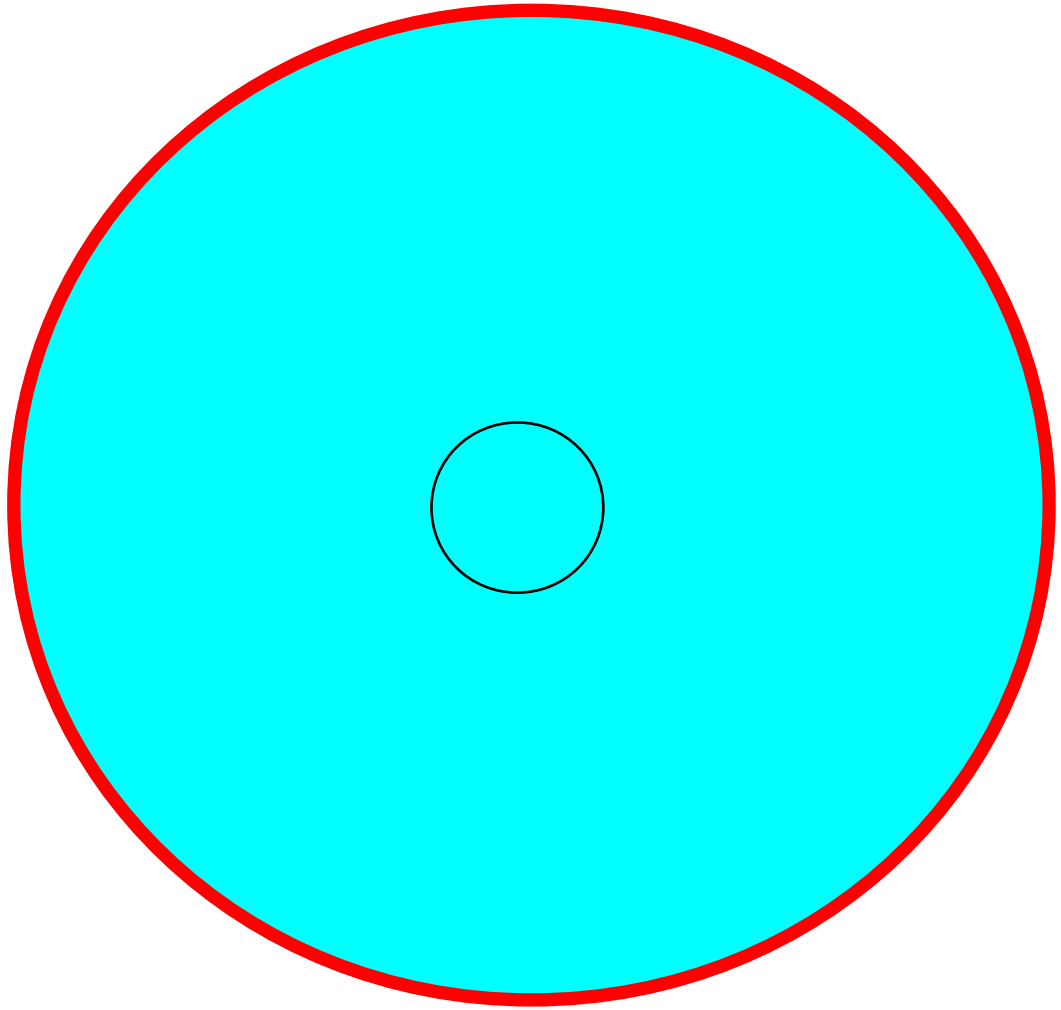
N

N.T.S.

Aylor Parks & Open Space - Structure 10 - Grain Silo

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Black Granular Tar (10-ASP1)

Exterior Tar Debris (10-ASP1)

N

N.T.S.

Aylor Parks & Open Space - Structure 10 - Grain Silo

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 10 / E. 136th & Quebec St, Thornton, CO	Project ID:	22030317

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
10-ASP1-1	**22030317-1**	**100**	**Black Granular Tar**	**CHRY**	**3**		**97**	**Q,T**	**N**
10-ASP1-2	22030317-2		POSITIVE STOP						

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

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Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/5/2022
Attn:	Chris Lehman		Date Reported: 8/8/2022
Client Project Name:	Aylor Property - Structure 10 / E. 136th & Quebec St, Thornton, CO		Project ID: 22030317

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

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Lab Use: 22030317

ELITE Program — AZ, CA, CO, FL, GA, VA, NJ

NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine [x] / 24 Hour [ ] / Same Day [ ] / 4 Hour [ ] / 2 Hour [ ]	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 MC
Relinquished By/Date: 7/29/22 MC
Relinquished By/Date:
Received By/Date: Pam 8-1-22 8 am
Sampler Type: Andersen [ ] SAS [ ] SampleAire [ ] AeroTrap [ ] Other [ ] BioCulture [ ]
PO#/Job#:
Project Name: Aylor Property - Structure 10
Notes: E. 136th & Quebec St, Thornton, CO
CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	10-ASP14	3002	1 set	
2	1 1-7	1		
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

LAB USE ONLY +

A: AG 8/5/22

V: _____

Q: AW 8/8/2022

Washington, D.C. (877) 648-9150 | Atlanta, GA (770) 947-2828 | Denver, CO (303) 232-3746 | Pho (602)

DS Environmental CONSULTING

"The trusted choice for your environmental & industrial hygiene needs."

PRE-DEMOLITION ASBESTOS INSPECTION REPORT

City of Thornton Aylor Park & Open Space – 13981 N. Quebec St, Thornton, CO

Structure 11 – Mobile Camping Trailer

PRESENTED TO:

Mr. Jack Denman,
Geologist/Principal
ERO Resources Corporation
303.903.8693
jdenman@eroresources.com

INSPECTED BY:

Mr. Chris Lehman
DS Environmental
Cell: (720) 369-6609

Mr. David Moss
DS Environmental
Cell: (720) 215-7198

PROJECT DETAILS:

DS Job Number: 27123&28898
Date of Inspection: July 25, 2022
June 7 & 14, 2024
October 28, 2025

Table of Contents

1.0 Introduction

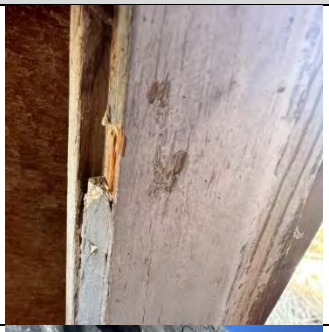
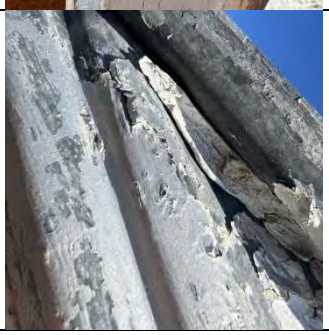
Mr. Chris Lehman and Mr. David Moss with DS Environmental Consulting (DS) conducted a comprehensive interior and exterior pre-demolition, full-building asbestos inspection of the former agricultural sub-grade storage cellar detailed on the cover page of this report and collected bulk-samples of all suspect asbestos-containing building materials (ACMs), both friable and non-friable, in and on the structure.

The purpose of the inspection was to determine if any of the materials in or on the building contain asbestos, and to determine which of those, if any, would require abatement prior to demolition.

The mobile camping trailer, is a metal constructed trailer with wood floor on a single axel, the trailer is approximately 145 square feet.

Summary of Findings

The below tables summarize the findings of the inspection and which materials require abatement prior to demolition. A diagram outlining the locations of the identified ACMs can be identified in Appendix C.

ACMs REQUIRING ABATEMENT				
ACM Description (HA ID)	**ACM Locations** ***See Appendix C for Material Map***	**Material Photograph**	**Quantity**	**Require Abatement?**
Off-White Window Glazing (11-WG1)	Exterior window frames and interior sash debris		~1 SF	**YES** – Friable
White Exterior Caulking (11-ECLK1)	Metal seams of camper shell and window/door frames		~575 SF	**YES** – Friable

2.0 Limitations of Inspection

The inspection was comprehensive in scope and does constitute a full-building inspection and fulfills the asbestos inspection requirements for structures that are to be demolished. The inspection included the interior, exterior, and roof.

- The *interior inspection* included all interior areas.
- The *exterior inspection* included all exterior components.

- The *roof inspection* was comprehensive in scope and included all roofing components and items on the roof.

The table below, (*Table 1.0*), lists the suspect asbestos-containing materials included in the scope of the inspection. It identifies the specific areas that were included in the inspection as well as descriptions of the suspect asbestos-containing materials in those areas that were sampled; or materials that were assumed to contain asbestos.

Table 1.0	Sampled or Assumed Suspect ACM within Scope of Work

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Suspect Asbestos-Containing Materials Sampled		**Material Locations Within Scope of Work** ****See Appendix B for Sample Location Map**
Homogeneous Area 1 (11-WG1)	**Off-White Window Glazing**	· Exterior window frames and interior sash debris **// 3% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**
Homogeneous Area 2 (11-SVF1)	Multi-Colored Sheet Flooring with Black Felt Backing	· Floor and shelfs **// No Asbestos Detected //** **// May Remain for Demo //**
Homogeneous Area 3 (11-ECLK1)	**White Exterior Caulking**	· Metal seams of camper shell and window/door frame **// 5% Asbestos Detected //** **// Friable //** **// Requires Abatement Prior to Demo //**

3.0 Conclusions & Summary of Findings

SUMMARY OF FINDINGS	ACRONYMS	ACM ASSESSMENT CATEGORIES
	CHRY – Chrysotile ACT – Actinolite TR – Trace; Assumed >1% Asbestos ND – None-detected ACM – Asbestos Containing Material (>1% asbestos) BRL – Below Reporting Limit; Assumed >1% Asbestos	1 – damaged/significantly damaged thermal system insulation ACM 2 – damaged friable surfacing material ACM 3 – significantly damaged friable surfacing material ACM 4 – damaged or significantly damaged friable miscellaneous material ACM 5 – ACM with the potential for damage 6 – ACM with the potential for significant damage 7 – any remaining friable ACM or friable suspected ACM

Materials in **RED** are materials that contain >1% asbestos.
Materials in **BLUE** are assumed to contain >1% asbestos.
Materials in **GREEN** contain 1% asbestos or less.
Materials in **BLACK** are none-detected for asbestos.

Sample Information **See Appendix B for Sample Location Map		Material Information	Asbestos Content
HOMOGENEOUS AREA 1	Sample ID: 11-WG1-1 Sample Location: NE window Sample ID: 11-WG1-2 Sample Location: West window ***See Appendix B for Sample Location Map*	Description: **Off-White Window Glazing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~1 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	3% CHRY
HOMOGENEOUS AREA 2	Sample ID: 11-SVF1-1 Sample Location: South wall shelf Sample ID: 11-SVF1-2 Sample Location: Floor, west center ***See Appendix B for Sample Location Map*	Description: **Multi-Colored Sheet Flooring with Black Felt Backing** Classification: Miscellaneous Material Condition: Significantly Damaged Quantity: ~206 ft^2 Friability: Friable Assessment Category: No Category (Non-ACM)	ND
HOMOGENEOUS AREA 3	Sample ID: 11-ECLK1-1 Sample Location: Exterior seam, SE corner Sample ID: 11-ECLK1-2 Sample Location: Exterior seam, NW corner ***See Appendix B for Sample Location Map*	Description: **White Exterior Caulking** Classification: Miscellaneous Material Condition: Damaged Quantity: ~575 ft^2 Friability: Friable Assessment Category: 4 Reason for Assessment: Potential for Contact: High Potential for Vibration: Low Potential for Air Erosion: Low	5% CHRY

4.0 Material Information

A *Homogeneous Area (HA)* means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture. The asbestos content of the bulk-samples collected within a homogeneous area can be applied to the entire homogenous area, if they conform to the above characteristics and the regulated minimum sample quantities of each type of material have been collected and analyzed. An *Asbestos Containing Material (ACM)* is a material that contains more than 1% asbestos. Any material can be assumed to be an ACM, but not the contrary.

4.1 Material Friability

A material can either be *friable* or *non-friable.* A friable material is one that, when dry, can be pulverized, or reduced to powder by hand pressure, a non-friable material cannot. A non-friable material may become friable if its condition had deteriorated or has been impacted by forces that have rendered it friable.

4.2 Material Classifications

Sampled materials are divided into one of the following three categories:

- *Surfacing Material*: sprayed or troweled onto structural building members
- *Thermal System Insulation (TSI)*: any type of pipe, boiler, tank, or duct insulation
- *Miscellaneous Material*: all other materials not classified in the above two categories

4.3 Material Conditions

Sampled materials are placed into one of the following three categories of conditions:

- *Good*: none to very little visible damage or deterioration
- *Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over less than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized
- *Significantly Damaged*: the surface is crumbling, blistered, water-stained, gouged, marred, or otherwise abraded over greater than one-tenth of the surface if the damage is evenly distributed, or one-quarter if the damage is localized

4.4 Sample Quantities

DS collected at least the minimum number of samples from each homogeneous area necessary to meet all regulatory requirements for the quantity of material to be disturbed in the scope of work as defined by the client. The quantities listed in this report are approximate and on-site verification of the exact quantity of each material is required for permitting, estimating, and billing purposes. The following outlines the minimum sample quantities required per homogeneous area for a regulatory compliant inspection; however, in the event of a due diligence inspection, these sample minimums may not have been met:

- *Surfacing Materials*: up to 1,000 ft^2 of material requires a minimum of three (3) samples; between 1,000 ft^2 and 5,000 ft^2 of material requires a minimum of five (5) samples; over 5,000 ft^2 of material requires a minimum of seven (7) samples; one (1) sample of each patch
- *Thermal System Insulation (TSI)*: each homogeneous area requires a minimum of three (3) samples; at least one (1) sample must be collected from each patch; and collect enough samples sufficient to adequately assess the material and determine the asbestos content for TSI fittings such as pipe elbows or T's, which a minimum of two (2) samples of each

- *Miscellaneous Materials*: collect enough samples sufficient to determine the asbestos content with a minimum of two (2) samples of each

4.5 Materials Reporting "TRACE" Results

Any sample reporting a "TRACE" amount of asbestos shall be considered to contain greater than 1% asbestos unless it is further analyzed utilizing the point-count method and verified to be less than or equal to 1% asbestos content, and therefore not an ACM. TRACE does not mean it contains less than or equal to 1%.

4.6 Materials Containing 1% Asbestos or Less

Materials containing less than or equal to 1% asbestos are not regulated by the Colorado Department of Public Health and Environment (CDPHE) Regulation 8, Part B – Asbestos. However, all demolition/abatement activities should be performed following the applicable Occupational Safety and Health Administration (OSHA) regulations. This includes, but is not limited to, the appropriate asbestos training for the type of material being removed/disturbed as well as having a properly trained supervisor onsite, using wet removal methods, wearing adequate personal protective equipment (HEPA-filtered particulate respirators), medical surveillance of workers, personal-exposure air monitoring, area air monitoring in occupied buildings, etc. There may also be landfill disposal requirements for these materials, depending on the facility. DS recommends that all demolition/renovation projects involving the disturbance of any amount of asbestos be subjected to post-work visual inspections and a final clearance air testing by a CDPHE-certified Asbestos Air Monitoring Specialist (AMS) after the work has been completed, but before any containments are dismantled, the contractor demobilizes, and the area is reoccupied.

4.7 Overspray

Any surfacing material indicated in this report also includes any associated overspray of that material, e.g., under carpet, above suspended ceilings, on studs and structural members, etc.

5.0 Inspector & Firm Certifications

The inspection detailed within this report was conducted by Mr. Chris Lehman and Mr. David Moss with DS. DS is a CDPHE certified Asbestos Consulting Firm, Registration No. 14912. Mr. Lehman and Mr. Moss are CDPHE certified Building Inspectors; having certification number 14348 and 28901 (*see Appendix A for certificates*).

6.0 Inspection, Sampling & Analytical Procedures

6.1 Inspection Procedures

The asbestos inspection detailed in this report was conducted by an Environmental Protection Agency (EPA) and CDPHE certified asbestos Building Inspector. The inspection procedures included identifying and sampling suspect ACM within the pre-defined areas that were within the scope of work, submitting samples to an accredited laboratory for analysis, classifying the materials and assessing their condition, and compiling a final report detailing the inspection and the analytical results of the bulk-samples.

6.2 Sampling Procedures

Statistically random bulk-samples representative of the suspect ACM of each homogeneous area were collected according to the guidelines published in the Environmental Protection Agency's October 1985 publication, "Asbestos in Building: Simplified Sampling Scheme for Friable Surfacing Materials", commonly known as the "Pink Book."

DS has collected the appropriate number of bulk-samples to meet all regulatory requirements for the classification and quantity of each homogeneous area. All reasonable efforts were made to identify homogeneous areas and to sample or assume suspect materials. Destructive investigation was conducted whenever feasible, and every effort was made to locate and quantify suspect ACM within the scope of work. Any material not identified and sampled in this report shall be assumed to be an ACM or shall be sampled by an EPA-trained and CDPHE-certified inspector and submitted for analysis.

6.3 Analytical Procedures

All asbestos bulk-samples were analyzed by a third party, National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory via Polarized Light Microscopy (PLM) for asbestos content per CDPHE Regulation 8 (*see Appendix C for laboratory report*).

7.0 Recommendations

The asbestos inspection detailed in this report did identify friable ACM(s) that will require professional abatement activities to remove or disturb prior to the demolition of the structure.

- ***This structure has significantly damaged ACM present below the trigger levels (~119 sq. ft. of exterior caulking and window glazing debris), however, this structure is on a site with a major asbestos spill in other structures. This structure is subject to III.T based on aggregate amounts of impacted asbestos on a multi-structure site, therefore, the spill must be cleaned up prior to any demolition, refer to Section 9.0 for more information.***

- ***Abatement is required to remove 1.) off-white window glazing on the exterior window frames and interior sash debris, and 2.) white exterior caulking used to patch the metal seams of the camper shell and window/door frames 3.) the significantly damaged debris and associated exterior soils (~228 ft²).***

8.0 Asbestos Abatement & Demolition Requirements

If ACM is to be removed or disturbed in a single-family residence, and the total quantity exceeds any of the regulatory trigger levels of 50 linear ft. on pipes, 32 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum, a CDPHE-certified General Abatement Contractor (GAC) is required to perform the work. The regulatory trigger levels within a commercial building are 260 linear ft. on pipes, 160 ft^2 on other surfaces, or the volume equivalent of a 55-gallon drum. In addition, formal notification to CDPHE prior to the abatement of ACM as well as air monitoring, visual inspections, and final air clearances by a CDPHE-certified Asbestos AMS is required. DS can provide the client or building owner with a proposal for project design, abatement oversight and air monitoring upon request.

CDPHE regulations allow for the demolition of a building that contains certain non-friable asbestos-containing materials, such as caulking, tars, and mastics; however, demolition must be completed without causing the non-friable ACM to be rendered friable. Certain other non-friable materials, such as cementitious siding (Transite) and resilient floor tiles must be abated prior to demolition. DS recommends abating all ACM prior to abatement, regardless of friability. Burning a building with any ACM is prohibited. Operations such as sanding, cutting, crushing, grinding, pneumatic jacking, etc. of ACM are not permitted. Recycling of building materials such as concrete, metal, or wood that are bonded or contaminated with ACM, e.g., glue, caulking, or mastic is also prohibited. If any of the non-friable asbestos containing materials are to be recycled and rendered friable after demolition (i.e., crushing mastic-coated concrete), these materials must be abated of all ACM prior to shipping offsite for recycling.

OSHA regulations regarding occupational exposure during demolition activities is still mandatory. OSHA 29 CFR 1926.1101 requires that workers performing construction-related activities be protected from asbestos fibers more than the permissible exposure limit of 0.1 f/cc of air. Contractors must comply with applicable provisions of OSHA 29 CFR 1926.1101 during demolition and renovation activities. These OSHA provisions include, but are not limited to, PPE and respirators, personnel training, personal-exposure air monitoring, employee medical surveillance, wet removal methods, signage for regulated areas, etc.

9.0 Major Asbestos Spills

If ACM is significantly damaged and the total quantity exceeds the regulatory trigger levels, the area is deemed a "Major Asbestos Spill." The area is consequently subject to the requirements in Reg. 8, Section III.T.2. – *Major Asbestos Spills*. Unless the entire facility is to be treated as a major asbestos spill, a Colorado-certified Air Monitoring Specialist (AMS) must determine the extent of the spill area. This may be done using visual examination, air samples, micro-vacuum dust samples, wipe samples or a combination thereof. If visible dust or debris is observed, directly related to or resulting from the known or assumed ACM which created the major asbestos spill, areas where it is observed must be included in the abatement of the spill. Samples must be collected and analyzed quantitatively by Transmission Electron Microscopy (TEM.)
The General Abatement Contractor (GAC) selected to perform the cleanup of the spill must:

- Submit notification in accordance with subsection III.E. (Notifications) or subsection III.G. (Permits), whichever is applicable to the Division for approval.
- Using certified Workers and Supervisors, in accordance with Section II. (Certification Requirements), construct a containment in accordance with the requirements of the regulation.
- HEPA vacuum then steam clean all carpets, drapes upholstery and other non-clothing fabrics in the contaminated area or discard these materials in accordance with subsection III.R. (Waste Handling)
- Launder or discard all contaminated clothing in accordance with subsection III.R. (Waste Handling)
- HEPA vacuum or wet wipe with clean amended water all hard surfaces in the contaminated area.
- Discard all waste in accordance with subsection III.R. (Waste Handling)

All persons must comply with any other measures, provided in writing by the Division, which are deemed necessary to protect public health. Following completion of Sections III.T.2.d.(i) through III.T.2.e., the AMS must comply with air monitoring requirements as described in Section III.P. (Clearing Abatement Projects); air samples must be collected aggressively as described in 40 C.F.R. Part 763, Appendix A to Subpart E (EPA 2010), except that the air stream of the leaf blower must not be directed at any friable ACM that remains in the area. Gross removal of additional ACM may not be conducted under Section III.T.2. Any remaining gross removal of ACM must be abated in accordance with Section III.H. (Abatement Sequence). If additional ACM is to be removed, the final air sampling required in Section III.T.2.f. is not required to be conducted until after the additional removal is completed.

10.0 Project Design & Project Manager Requirements

DS can provide an Asbestos Abatement Project Design as well as fulfill the Colorado Asbestos Abatement Project Manager requirements for any asbestos abatement project, as applicable below.

Project Design
An abatement *Project Design* is an accurate and detailed scope of work, which includes project specifications and procedures, containment design/equipment placement, and descriptions of engineering controls and work

practices for an asbestos abatement project or response action that is required by CDPHE Regulation Number 8, Part B - Asbestos (Reg. 8) on large asbestos abatement projects. Prior to the start of any asbestos abatement project in a non-school building, where the amount of asbestos-containing material (ACM) to be removed or disturbed exceeds 1,000 linear feet on pipes, or 3,000 square feet on surfaces, or in a school building in which the amount of friable ACM to be abated exceeds 3 linear feet on pipes, or 3 square feet on surfaces, a written Project Design must be developed by a State of Colorado certified Project Designer in accordance with subsection IV.G.7 of Regulation 8. A signed copy shall be posted on-site prior to commencing any abatement activities, shall be always available on-site, and shall remain onsite until final air clearances have been completed by a State of Colorado-certified Air Monitoring Specialist (AMS).

Project Manager

A *Project Manager* shall be used on all asbestos abatement projects in which the amount of friable asbestos-containing material to be abated exceeds 1,000 linear feet on pipes, or 3,000 square feet on other surfaces per CDPHE Regulation Number 8, Part B – Section III.B.6. An asbestos Project Manager on an abatement project shall be responsible for assessing that the project is conducted in accordance with Regulation 8, assessing that the Project Design is followed, assessing that the abatement project is cleared in accordance with Regulation 8, assessing that the asbestos waste generated on the project is properly manifested and disposed of in accordance with Regulation 8, and communicating these assessments to the building owner or GAC.

The GAC shall notify the building owner during the bid process as to whether a Project Manager is required. Project Managers shall be independent of the asbestos abatement contractor and work strictly on behalf of the building owner to the extent feasible unless the abatement is being performed in-house. Project Managers must sign the original copy of the abatement permit for the permit to be valid, and before any abatement can take place.

11.0 Disclaimer & Limitations

The activities outlined in this report were conducted in a manner consistent with a level of care and expertise exercised by members of the environmental consulting and industrial hygiene profession. All activities were performed in accordance with all applicable federal, state, and local regulations as well as generally accepted standards and professional practice. No warranty is either expressed or implied. DS assumes no responsibility or liability for errors in public information utilized, statements from sources other than DS, or developments resulting from situations outside the scope of work for this project.

The details provided within this report outline the inspection activities on the date(s) indicated and should not be relied upon to represent conditions later. The laboratory results contained in this report apply specifically to the materials in which bulk-samples were collected. The results do not include or apply to any other materials within the structure that were not sampled but may contain asbestos; including materials that may be hidden or inaccessible. Additional inspection and bulk-sampling activities by a certified inspector would be required to determine whether any other materials contain asbestos.

This report has been prepared on behalf of and exclusively for use by the DS's client, with specific application to their project as discussed in the scope of work. The information contained in this report is intended as supplementary material for abatement design and is not to be used as the sole means to develop the scope of abatement activities, bidding, or billing purposes. Contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. DS can provide a full scope of work for abatement upon request. DS does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report.

12.0 Copyright Notice

APPENDIX A: CERTIFICATIONS

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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: June 02, 2022

Expires: July 13, 2023

* 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

Chris Lehman 2022 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

John C Lehman

Certification No.: 14348

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:

Inspector/Management Planner*

Issued: July 05, 2023

Expires: July 05, 2024

* 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

Chris Lehman 2024 Inspector Certification: 14348

Colorado Department
of Public Health
and Environment

ASBESTOS CERTIFICATION*

This certifies that

David Moss

Certification No.: 28901

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: May 16, 2025

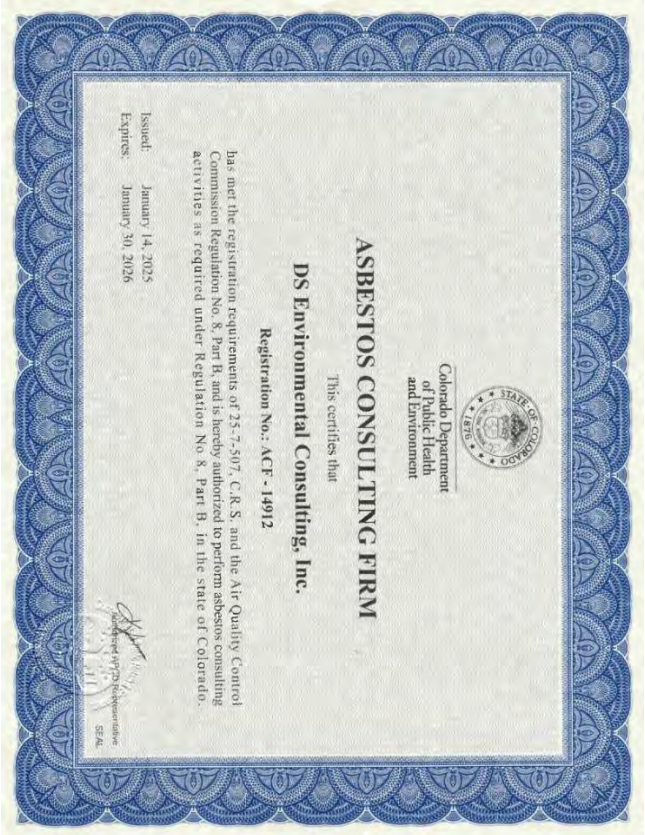
Expires: June 05, 2026

* 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

David Moss 2025 Inspector Certification: 28901



Colorado Department
of Public Health
and Environment

ASBESTOS CONSULTING FIRM

This certifies that

DS Environmental Consulting, Inc.

Registration No.: ACF - 14912

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

Issued: January 14, 2025

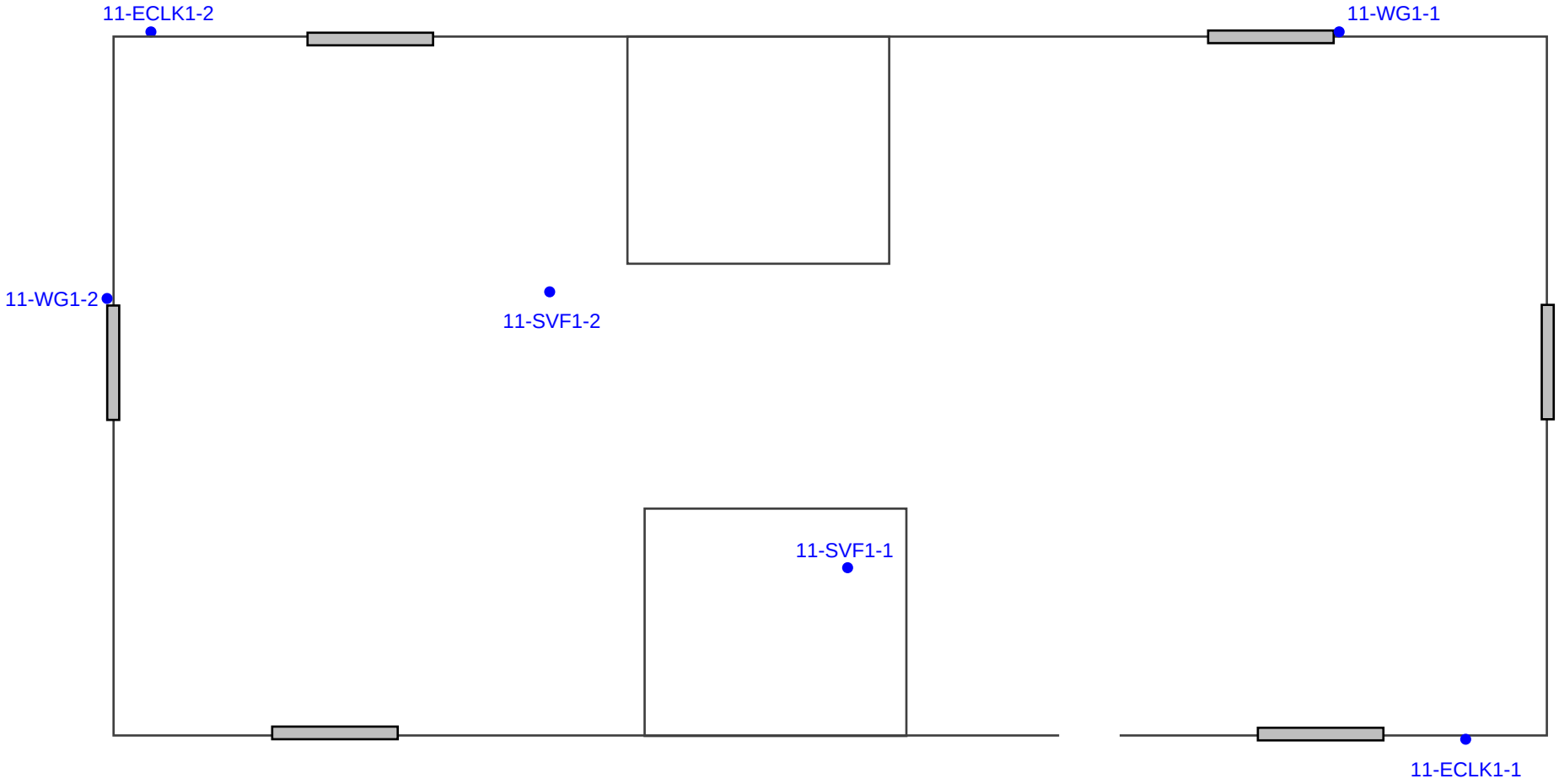
Expires: January 30, 2026

Authorized APCD Representative

SEAL

Firm Certification: 14912

APPENDIX B: SAMPLE LOCATIONS



Key:

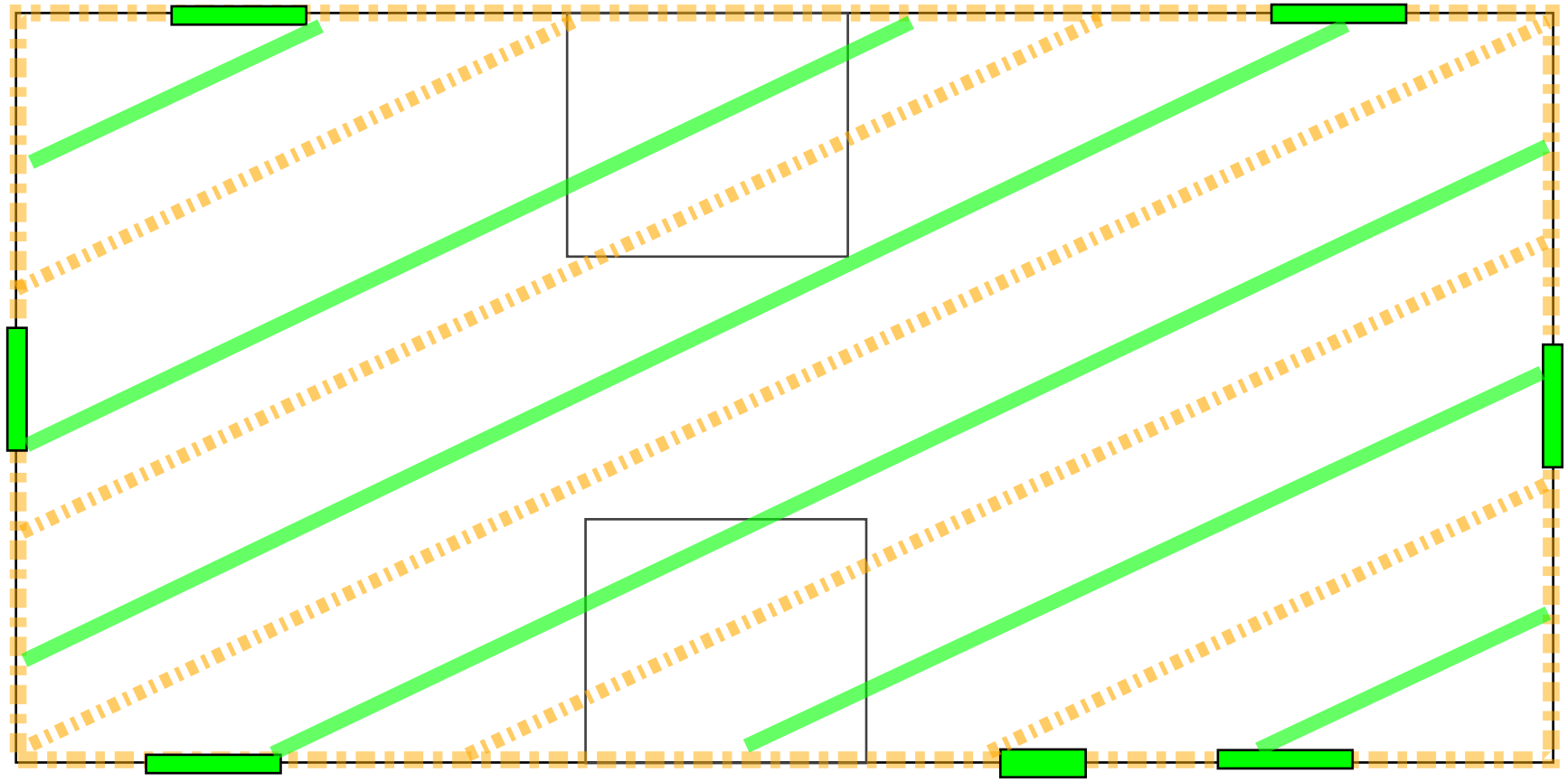
N

N.T.S.

Aylor Parks & Open Space - Structure 11 - Mobile Camping Trailer

DS Environmental CONSULTING

APPENDIX C: ACM LOCATIONS



Key:

Window Glazing and Associated Debris (11-WG1)

Exterior Caulking at Metal Seams Walls and Roof (11-ECLK1)

N

N.T.S.

Aylor Parks & Open Space - Structure 11 - Mobile Camping Trailer

DS Environmental CONSULTING

Key:

ACM Caulking (11-ECLK1) & Window Gazing Debris (11-WG1) and Associated Soils on Exterior

N

N.T.S.

Aylor Parks & Open Space - Structure 11 - Mobile Camping Trailer

DS Environmental CONSULTING

APPENDIX D: LAB REPORTS

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
Golden, CO, 80401
303.232.3746
www.aerobiology.net

Certificate of Analysis

NVLAP TESTING
NVLAP Lab Code 200860-0

Client Name	DS Environmental Consulting	Date Collected:	7/29/2022
Street Address	7555 W. 10th Ave, Suite A	Date Received:	8/1/2022
City, State ZIP	Lakewood, CO 80214	Date Analyzed:	8/5/2022
Attn:	Chris Lehman	Date Reported:	8/8/2022
Client Project Name:	Aylor Property - Structure 11 / E. 136th & Quebec St, Thornton, CO	Project ID:	22030324

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

Sample Identification		Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)
Client	Lab Sample Number								
11-WG1-1	22030324-1A	Tr	Silver Paint	ND			100		N
	22030324-1B	**100**	**Off-White Glazing**	**CHRY**	**3**	**10 TL**	**87**		**N**
11-WG1-2	22030324-2		POSITIVE STOP						
11-SVF1-1	22030324-3	100	Gray/Off-White Sheet Vinyl with Black Fibrous Backing	ND		60 CELL	40	T	N
11-SVF1-2	22030324-4	100	Gray Sheet Vinyl with Black Fibrous Backing	ND		60 CELL	40	T	N
11-ECLK1-1	22030324-5A	2	Silver Paint	ND			100		N
	22030324-5B	**98**	**White/Brown Caulk**	**CHRY**	**5**		**95**		**N**
11-ECLK1-2	22030324-6		POSITIVE STOP						

Anita Grigg
Laboratory Analyst

Shannon Whitmore
Asbestos Lab Supervisor

AC = Actinolite	AH = Animal Hair	B = Binder	Q = Quartz
AM = Amosite	CELL = Cellulose	C = Calcite	T = Tar
AN = Anthophyllite	FG = Fibrous Glass	D = Diatoms	V = Vermiculite
CHRY = Chrysotile	MW = Mineral Wool	G = Gypsum	
CR = Crocidolite	OT = Other	M = Mica	
TRM = Tremolite	SYN = Synthetic	OR = Organic	
Tr = Trace	TL = Talc	OP = Opaques	
ND = None Detected	W = Wollastonite	P = Perlite	

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

780 Simms Street
Suite 104
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www.aerobiology.net

Certificate of Analysis

Client Name	DS Environmental Consulting		Date Collected: 7/29/2022
Street Address	7555 W. 10th Ave, Suite A	NVLAP TESTING	Date Received: 8/1/2022
City, State ZIP	Lakewood, CO 80214	NVLAP Lab Code 200860-0	Date Analyzed: 8/5/2022
Attn:	Chris Lehman		Date Reported: 8/8/2022
Client Project Name:	Aylor Property - Structure 11 / E. 136th & Quebec St, Thornton, CO		Project ID: 22030324

Test Requested: **3002, Asbestos in Bulk Samples**
Method: EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA -- 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- **ND** indicates no asbestos was detected; the method detection limit is 1 %.
- **Trace** or "< 1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.
- All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral riebeckite.
- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be preformed by a TEM. ***A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.***
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distunguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- Any reproduction of this document must include the entire document in order for the report to be valid.

Aerobiology Laboratory Associates, Incorporated
Expertise Since 1997

Lab Use: 22030324

ELITE Program — AZ, CA, CO, FL, GA, VA, NJ

NVLAP — AZ, CA, CO, VA

AZ, CA, CO, FL GA, NJ, VA

Aerobiology Client	DS Environmental Consulting, Inc.
Field Contact	Chris Lehman
Reporting Address	
Billing Address	7555 W. 10th Ave, Lakewood, CO
Phone/Fax	720-369-6609
Reporting Email (s)	chris@dsconsultinginc.com & DS Distribution Group
Routine [x] / 24 Hour [ ] / Same Day [ ] / 4 Hour [ ] / 2 Hour [ ]	
SAMPLING LOCATION ZIP CODE	

Collected By/Date: 7/29/22 MC
Relinquished By/Date: 7/29/22
Relinquished By/Date:
Received By/Date: PAM 8.1.22 9am
Sampler Type: Andersen [ ] SAS [ ] SampleAire [ ] AeroTrap [ ] Other [ ] BioCulture [ ]
PO#/Job#:
Project Name: Aylor Property - Structure 11
Notes: E. 136th & Quebec St, Thornton, CO
CC Info: Analyze sets progressive

	Sample No.	Test Code	Sample Location	Total Volume/Area
1	11-WBL-1	3002	> set	
2	+ 1-2	↓		
3	11-SVFL-1		> set	
4	+ 1-2			
5	11-ECLK1-1		> set	
6	+ 1-2	↓		
7				
8				
9				
10				
11				
12				
13				
14				
15				

1054	Direct, Non-viable Spore Trap
1051	Direct, Qualitative- **Swab/Tape**
1050	Direct, Qualitative- **Bulk**
1005	AIR Culture - Bacterial Count w/ ID's
1030	AIR Culture - Fungal Count w/ ID's
1006	SWAB Culture - Bacterial Count w/ ID's
1031	SWAB Culture - Fungal Count w/ ID's
1008	BULK Culture - Bacterial Count w/ ID's
1033	BULK Culture - Fungal Count w/ ID's
1007	WATER Culture - Bacterial Count w/ID's

Washington, D.C. (877) 648-9150 | Atlanta, GA (770) 947-2828 | Denver, CO (303) 232-3746 | Phoe (602)

LAB USE ONLY +

A: AG 8/5/22

V: _____

Q: AW 8/8/2022

Colorado Department of Public Health and Environment

Regulation No. 8, Part B Variance Request Form

Submit form to:
Permit Coordinator
Colorado Dept. of Public Health and Environment
APCD-IE-B1
4300 Cherry Creek Drive South
Denver, CO 80246-1530
Phone: 303-692-3100
Fax: 303-782-0278
asbestos@state.co.us

Please submit a $50 review fee for each Variance Request Form submitted.
The fee must accompany the Variance Request Form at the time of submission.
The fee will not be refunded if the variance request is denied or withdrawn.

Name of Facility:	Facility Location:	
Aylor Property	13981 Quebec St. Thornton, Colorado 80602	
GAC/Consultant submitting request: DS Environmental Consulting, Inc.	Phone # (720) 369-6609	Fax # ( )
E-mail Address: chris@dsconsultinginc.com	Permit Number (if already issued): 77AD0002A	

For the above referenced location(s) we are requesting a variance from the requirements of the following Section(s) of Regulation No. 8, Part B: PLEASE CITE THE SPECIFIC SECTION NUMBERS.

Section(s)	Title(s) (if any)	Page(s)
III.T.2.d.(ii)(B)	Install Critical Barriers	71
III.T.2.d.(ii)(C)	Air Cleaning & Negative Pressure Requirements	71
III.T.2.f & III.T.2.g	Clearing Abatement Projects & Abatement Sequence	71

Describe your proposed alternative procedures for this particular project. Explain in detail why you believe this section of the regulation is "not practical and feasible" for this project; **OR** explain in detail how the "proposed alternative procedures will provide equivalent control of asbestos". Provide photographs, diagrams, and/or independent reports to substantiate your statement. Supportive digital photographs may be e-mailed to asbestos@state.co.us

Please refer to the vairance request Work Plan/Project Design (WP/PD) prepared by DS Environmental attached to this submission.

APPROVED
By Jeffrey Wolfe at 6:20 pm, Jan 19, 2026

I, the undersigned, hereby certify that the information contained in this request is true and understand that deliberately providing false or misleading information may result in the suspension or revocation of my certification in addition to the imposition of civil and/or criminal penalties:

Signature:	Print Name: Chris Lehman	Date: 11/5/2025

Reviewed by: JWA, CLB, RWJ, ADS, RKS & LAS	**CDPH&E use only** Form of Payment & #	259786102	[Code 199
Date: APPROVED By Jeffrey Wolfe at 6:21 pm, Jan 19, 2026	Additional Provision(s)? YES (see below) NO		

APPROVED
By Jeffrey Wolfe at 6:20 pm, Jan 19, 2026

Note: This variance is null and void if all additional provisions are not met.

ASBESTOS ABATEMENT VARIANCE REQUEST WORK PLAN AND PROJECT DESIGN FOR CONTROLLED DEMOLITION OF ASBESTOS CONTAINING MATERIALS

Project Location:

13981 Quebec St. Thornton, Colorado 80602

Prepared For:

Kendrick Wyman
City of Thornton Project Manager
Parks, Recreation & Community Programs
kendrick.wyman@ThorntonCO.gov

Prepared By:

Chris Lehman
DS Environmental Consulting
7555 W. 10th Ave., Ste. A
Lakewood, Colorado 80214

Date Prepared: October 31, 2025 *Version 1.0*
Date Revised: January 7, 2026 *Version 1.3*

APPROVED
By Jeffrey Wolfe at 6:23 pm, Jan 19, 2026

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EXHIBITS

DS Environmental Consulting, Inc. (DS) has prepared the following work plan in support of a variance request in accordance with Section III.W. *Structurally Unsound Building* of Colorado's Regulation No. 8, Part B. This work will be conducted by a Colorado-licensed General Abatement Contractor (GAC**).**

1.0 INTRODUCTION

The City of Thronton is going to contract a GAC to perform asbestos abatement and cleanup of multiple farm buildings, some which have deteriorated to the point of being structurally unsound and a Major Asbestos Spill is present. A Colorado-licensed structural engineer was retained by the City to fulfil the requirements of III.E.4 since no State or local qualified governmental representative was available. Please refer to *Exhibit F.1, Structurally Unsound Determination Letter* for which structures are unsound and *Exhibit F.2, Structurally Sound Determination Letter* which structures are structurally intact. A structural engineer from local or state government was not utilized for the structurally unsound assessment because the City of Thornton contracts out structural engineering services.

Below is a summary of all buildings onsite, refer to *Exhibit C - Building Site Map,* the buildings included in this variance request/Project Design are highlighted in yellow:

1. **Structure 1 Residence** – single-story wood framed constructed home, ~1,911 sq. ft. This building is structurally sound and will be abated in accordance with Regulation 8 prior to demolition.
2. **Structure 2 Well House** – single-story wood framed constructed building with corrugated metal siding, tar/shingle roofing and concrete floor, the structure is ~90 sq. ft. and it houses the well and associated pump. No asbestos was identified requiring abatement prior to demolition.
3. **Structure 3 Poultry Shed** – single-story wood frame constructed building with metal siding, ~950 sq. ft. The structure has a carport on the north side with gravel floor ~620 sq. ft., the south side interior is an unfinished space with corrugated metal walls and concrete floor ~330 sq. ft. This building is structurally sound and will be abated in accordance with Regulation 8 prior to demolition.
4. **Structure 4 Storage Cellar** – a sub-terranean storage cellar wood framed constructed structure with concrete stairs accessing the east side, the structure is ~400 sq. ft. and it was used as a storage cellar/shelter. The cellar was accessible during the initial inspection in 2022; however, the interior was no longer safely accessible due to collapse of a portion of the roof and the entry during a follow-up inspections in 2024 and 2025. This structure is included in this work plan.
5. **Structure 5 Chicken Coop Barn** – single-story CMU constructed building with a wood framed roof, ~1,710 sq. ft. The west CMU wall of the structure has collapsed and the roof is hanging on the west side of the building. This structure is included in this work plan.
6. **Structure 6 Poultry Barn** – a partially sub-grade single-story wood framed constructed building with corrugated metal roof/siding and dirt floor, the structure is ~6,160 sq. ft. The wood framing supports of the structure have partially collapsed. This structure is included in this work plan.
7. **Structure 7 Livestock Barn** – single-story CMU constructed building with a wood framed/metal sheeted roof, ~885 sq. ft. The north 2 "tack rooms" have concrete floors ~280 sq. ft. and the south stable area has a dirt floor ~605 sq. ft. The east CMU wall of the structure is collapsing on the north half of the building. This structure is included in this work plan.
8. **Structure 8 Livestock Lean-to** – a 3-sided wind shelter structure constructed of unfinished CMU block. There is a dirt floor, no roof and the structure has a foot-print of ~1,280 sq. ft. No asbestos was identified requiring abatement prior to demolition. This structure is located outside

the spill area on the east side between the northeast and southeast entries to the RWA, based on the location the demolition and disposal of this structure will be completed prior to abatement within the work area. Refer to *Section 3 -Site Preparation*, page 7 for full sequencing requirements.

9. **Structure 9 Feed Shed** – a wood framed constructed structure with metal roofing, the structure is ~240 sq. ft. and it was used as a feed storage shed. This structure is unsound but not included in this work plan. This is a small structure that will be abated and demolished by hand in accordance with Regulation 8.
10. **Structure 10 Silo** – a sheet metal constructed structure with metal roofing and metal pan floor, the structure is ~150 sq. ft. and it was used to store grains. This building is structurally sound and will be abated in accordance with Regulation 8 prior to demolition.
11. **Structure 11 Mobile Camping Trailer** – a metal constructed trailer with wood floor on a single axel, the trailer is ~145 sq. ft. This building is structurally sound and will be abated in accordance with Regulation 8 prior to demolition.

A major spill containment cannot be constructed on structures 4, 5, 6 & 7 due to site conditions and safety. The structural integrity of all the buildings are in very poor condition and quickly deteriorating so it is not safe for personnel to enter the footprint of the buildings to safely set a containment according to *III.T.2*. There is an underground storage structure *(Structure 4)* that is an engulfment hazard preventing any person from safely entering, the ACM roofing tar paper is between the remaining roof structure and dirt cover as well as debris in the bottom in the dirt. The poultry barn *(Structure 6) has* tar roofing paper is between roof structural members and metal weather sheathing and the building is collapsing. The chicken coup barn and livestock barn *(Structures 5 & 7)* have collapsing roofs and un-reinforced CMU walls that are collapsing. Portions of roofs are missing, shear walls are unstable, walls are collapsed or compromised and can collapse without warning on personnel if inside these structures. The size of the spill area and structures creates the necessity for heavy equipment to safely demolish the structures and handing the debris appropriately make constructing a containment unfeasible and unsafe. The purpose of this variance request is to perform an open-air, controlled demolition/removal of the debris of the buildings. This variance request includes the necessary alternative procedures provide equivalent control of asbestos engineering controls, work methods and appropriate mitigations to minimize the release of asbestos fibers during open-air abatement (controlled demolition) and prevent the migration of fibers out of the regulated work area (RWA).

Friable asbestos containing building materials (ACM) were identified creating a Major Asbestos Spill. The scope of work includes the controlled removal of the friable asbestos-containing roofing tar, roofing tar paper, CMU patch tar, window glazing, all associated non-asbestos containing asbestos contaminated building materials, and the underlying 2" of soil. Once the gross debris is removed from the surface of the soil, 2" of soil shall be removed. If any additional material or debris is found this process of removing 2" of soils shall be repeated, 2" soil lifts will be removed until there is no more visible debris. All generated waste shall be disposed of as friable asbestos waste. All work on this project shall be performed in strict accordance with this Work Plan and all modifications must be approved by the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) prior to implementation. This Work Plan will serve as the Project Design for the project.

DS Environmental performed an initial asbestos survey inspection on July 25, 2022 which determined regulated asbestos containing materials were present in the structures. On June 7 & 14, 2024, DS revisited the site to refresh the inspection reports with current site conditions as the City was trying to budget cleanup efforts. The buildings had deteriorated to the point they were beginning to collapse; this rendered some previously non-friable ACM friable and also

significantly damaged friable ACM creating a *Major Asbestos Spill.* DS performed a spill delineation on July 15, 2024 and updated on October 28, 2025 on the site for the preparation of this work plan. A copy of the asbestos inspection and spill delineation reports issued can be found in *Exhibit H – Asbestos Inspection Report & Asbestos Spill Delineation Report)* of this Work Plan.

The footprints of the buildings are approximately:

- **Structure 4** ***(Sub-Grade Storage)*** a 400 sq. ft. sub-terranean storage cellar constructed with wood framed roof covered with dirt, dirt walls, dirt floors and concrete stairs. There is no debris around the structure and the interior soil footprint is approximately 400 square feet in surface area where ~12 sq. ft. of debris is to be removed. The concrete stairs are approximately 60 sq. ft. in surface area.
- **Structure 5** ***(Chicken Coup Barn)*** a 1,710 sq. ft. CMU walls and wood framed roof structure that is slab on grade construction, no basement or crawlspace is present. The surface area of interior and exterior is 1,750 sq. ft. of concrete. The debris around the structure and associated underlying soil footprint to be removed is approximately 3,201 square feet in surface area.
- **Structure 6** ***(Poultry Barn)*** ~6,160 sq. ft. of interior contaminated soil to be removed. The exterior debris and associated underlying soil footprint to be removed is approximately 7,890 square feet in surface area.
- **Structure 7** ***(Livestock Barn)*** ~885 sq. ft. CMU walls and wood framed roof structure that is slab on grade construction on the north side and center tack rooms and dirt floor on the south side stable area. The debris around the structure and associated underlying soil footprint to be removed is approximately 1,402 sq. ft. in surface area and the surface area of concrete in the tack rooms are ~280 sq. ft.
- **Remaining RWA –** The remaining surface area of the RWA include enlarged areas around the building to facilitate heavy equipment not tracking on debris and safe handling of debris including roads connecting the buildings and facilitating truck haul routes. The total RWA footprint is approximately 40,283 square feet (~38,252 sq. ft. of soil and (~2,030 sq. ft. of concrete. (Refer to *Exhibit C - Building Site Map*).

The RWA is located on a 139-acre parcel of vacant land currently housing an abandoned farmstead, a telecommunication facility and a Nature Library that is under construction. The RWA boundaries are approximately 1,318 feet west of Quebec St and approximately 2,015 feet from 136th Avenue to the south. There are multiple buildings onsite, only the buildings that are deemed structurally unsound and require heavy equipment to dismantle. There are no structures within 150 feet of the RWA, all structures in the vicinity of the subject property are listed as follows:

1. **West Side:** There is a residential sub-division located to the west of the RWA. The houses that back to the property are 13856-13970 Locust St, ~986-1,090 feet west of the RWA;
2. **North Side:** There is a telecommunications radio tower building located ~224 feet north-west of the RWA, there are no other structures to the north for over 1 mile as there is another former farm parcel;
3. **East Side:** A commercial property with multiple buildings is located at 13955 Quebec St, ~994 feet west of the RWA and a residential property with multiple buildings located at 13941 Quebec St, ~979 feet west of the RWA; and
4. **South Side:** Anythink Nature Library is under construction at 6811 E. Quebec St, ~2,056 feet south of the RWA.

Please refer to *Exhibit A – Site Location Map* to assist in the visualization of this narrative.

The scope of work includes the controlled removal of the debris with friable asbestos containing

various roofing tars and tar sealants, roofing felt paper, window glazing, exterior caulking and all associated remaining building materials/debris. The asbestos inspection reports are attached, please see *Exhibit H – Asbestos Inspection Report*. All debris plus 2" of soil located in the within the regulated area of the buildings with debris shall be abated. All generated waste shall be disposed of as friable asbestos-containing waste material (ACWM). All work on this project shall be performed in strict accordance with this Work Plan, and all modifications must be made by the listed Colorado-certified Asbestos Project Designer and approved by the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) prior to implementation.

The following narrative is to sequence progression of removal/loading debris and is intended so that **vehicles or equipment do not drive or track on debris as that is strictly prohibited in this work plan.** The RWA has been extended around each building to facilitate the excavator starting point that is not on ACM building materials or ACM debris. Controlled demolition will begin from the SW area of the RWA. This starting point will facilitate the excavator the easiest access to begin clearing the path east to Structure 6, north to Structure 7 and NE to structures 5 & 4 in a controlled manner by directly loading building materials into lined waste trailers. The excavator will progress east and north, removing and directly loading the debris. This sequence will facilitate the excavator to methodically progress through the RWA without tracking, refer to *Exhibit E – Excavator Demolition Progression Plan*.

The excavator will conduct the debris removal in a slow, controlled and methodical manner. Debris will be directly loaded into lined truck trailers as it is demolished/removed, debris and stockpiles shall not accumulate to minimize emissions.

This project requires a Project Manager per *Section III.B.6*. or a signed Project Manager Waiver per *Section III.B.6.a,* approved by the CDPHE/APCD. The CDPHE/APCD approved permit must be posted onsite and accompany this Work Plan, if a **Project Manager** is contracted to oversee the project, they **must sign the CDPHE/APCD approved permit for it to be valid**. This Work Plan will also serve as the Asbestos Project Design and shall remain onsite for the duration of abatement until the final visual inspection has been conducted and final visual criteria has been met per *Section 9.0* of this Work Plan. Chris Lehman, CO Project Designer Certification 14348, visited the site on June 12, 2026. Please refer to *Exhibit I – Certifications* for the Project Designer Certificate *(III.c.3.f)*. Any changes to this Work Plan/Project Design must be made by the certified Asbestos Project Designer or CDPHE/APCD. The work area will be recleaned by the GAC if the area fails the visual clearance, this will be repeated until the regulated work area (RWA) meets the visual clearance criteria inspection *(III.c.3.e)*. Refer to *Exhibit G – Asbestos Containing Material Locations Diagram* for types and location of the ACM *(III.C.b.)*.

2.0 TRAINING & PERSONAL PROTECTIVE EQUIPMENT

All personnel allowed within the RWA during active ACM management will be AHERA trained, and State of Colorado certified for asbestos (minimum 1, 40-hour trained supervisor and all other employees 32-hour trained workers) including abatement supervisors, workers, equipment operators, building inspectors (24-hour trained asbestos building inspectors), and air monitoring specialists (32-hour AMS training).

A CDPHE-certified AMS from DS Environmental will be on site at all times during active abatement and will have the authority to stop all work as necessary. The AMS will continuously monitor and record wind-speed readings every 15 minutes, observe abatement operations, and

assess that site cleanup activities are performed in accordance with the procedures outlined in the most current version of the abatement Project Design and this approved Work Plan.

All personnel working within the RWA will be properly trained and certified for the specific tasks they are performing. There will be a Colorado-certified Asbestos Abatement Supervisor onsite at all times while any work is being performed, and the workers and equipment operators will have current Colorado Asbestos Worker or Colorado Asbestos Supervisor certifications. All personnel will be instructed and knowledgeable in the hazards of asbestos exposure, use of personal protective equipment (PPE), decontamination procedures, and all aspects of performing this asbestos abatement work. Workers and Supervisors will have completed annual medical examinations and will be fit-tested for respirators prior to working at the site, in accordance with OSHA requirements.

The GAC will provide workers with the proper PPE necessary to safely perform their specific tasks. PPE will include respirators, disposable protective coveralls, footwear, head protection, eye protection, gloves, etc. The CDPHE-certified work crew shall always wear disposable clothing such as a Tyvek® suits with no street clothing underneath and a minimum of a half-face respirator for respiratory protection with HEPA P-100 filtration inside the RWA.

The GAC will comply with OSHA 29 CFR 1926.1101 and OSHA CFR 1910.134 and the GAC's Respirator Protection Plan/Program. All respirators worn during work activities will be NIOSH certified and accepted by OSHA for use to protect against inhalation of asbestos fibers. Each worker must perform positive- and negative-pressure fit checks every time a respirator is donned.

3.0 SITE PREPARATION

The RWA will be surrounded by a minimum six-foot chain-link fence affixed with a wind screen to maintain a wind break, security, and access control. The RWA will also be surrounded by asbestos warning tape and OSHA-compliant signage will be placed on the perimeter fencing and at each approach to the RWA. There are no permanent structures within 150' of the site for offering critical-barrier installation, refer to *Exhibit A – Site Location Map* for the locations of the closest surrounding structures and approximate distances.

Once the site fencing is installed and asbestos warning signs are posted on the outside of the fencing, the demolition of Structure 8 will be performed to facilitate more room for truck egress on the NE and SE access points. The GAC is required to obtain the CDPHE/APCD demolition permit for Structure 8 when permitting this variance request. The signed demolition permit application will be provided to the GAC by DS Environmental. The demolition of Structure 8 is required prior to any abatement within the RWA, the onsite AMS will perform a post demolition visual inspection once the debris is removed.

The perimeter of the RWA will be surrounded with a 6-mil polyethylene-lined dirt berm constructed at a minimum of 6-inches high with uncontaminated soil just inside the wind fencing to mitigate any asbestos-contaminated water from migrating out of the RWA. The soil for the berms will be sourced from uncontaminated soils onsite; the site is 139 acres facilitating clean native soils to be used for the berm construction. Commercially manufactured berms are not approved for this project. The berm must be lined with one (1) layer of 6-mil polyethylene and sealed in place with soil, the berms will be constructed in as long, continuous pieces as possible, any sectioned pieces of berm will be conjoined together or overlapped to prevent any water migration from the site. A daily inspection shall be performed by the GAC supervisor and the on-

site AMS to verify the berms are structurally intact and functioning as designed, a daily inspection log must be maintained onsite. Water shall not be allowed to pool at the berms, and the soil and polyethylene must be disposed of as friable ACWM at the end of the project. There are no storm inlet drains or storm sewer access covers within the RWA, however, under no circumstances is runoff allowed from site activities leaving the RWA.

A truck/waste-container loading area will be constructed adjacent to each building on uncontaminated soil in the RWA. This truck/waste container loading area will be included within the RWA on a loading/decontamination pad, loading pads will not be installed over 'major spill' areas. The perimeter of the loading area will be surrounded with a 6-inch berm to prevent water from migrating in or out. The loading/decontamination pad will have a minimum of two (2) layers of 10-mil reinforced polyethylene sheeting on the ground which extends up the sides of the 6" berm. The dirt berm and polyethylene sheeting in the truck/waste-container loading pad will be set up in a manner that is effective in preventing the migration of contaminated water & debris outside of the loading area, the berm on the east and west sides shall be movable with the gate. These mitigation measures will be maintained in good working condition, and water will not be allowed to pool in the loading/decontamination pad area. The loading pad polyethylene sheeting will be inspected by the AMS between each load; any torn ground polyethylene sheeting must be replaced immediately; the ground polyethylene sheeting will be disposed of as friable ACWM. It is the responsibility of the supervisor and the on-site AMS to ensure the cleanliness and integrity of all ground polyethylene sheeting. The loading area shall be kept clean, and workers will remove any debris that falls between trucks as necessary to keep the truck fenders and tires clean from contamination. Wastewater collected from the loading area will be filtered down to 5 microns and disposed of in a sanitary sewer. Any asbestos waste water generated will be filtered to a fiber size of 5.0 microns, containerized in a UN rated drums lined with 2 layers of 6-mil polyethylene drum liners and sealed leak-tight, labeled as required by EPA's NESHAPs Standard 40 CFR Part 61, Subpart M, OSHA and DOT regulations for transport and discharged into a sanitary sewer inlet provided by the City of Thornton near 6811 E. Quebec St. (refer to *Exhibit A – Site Location Map* for the location). The loading area, trucks and waster trailers will be visually inspected by the AMS for each load prior to the trucks/trailers exiting the RWA, and no debris will be present on a truck or waste trailer before exiting the RWA. Contaminated trucks/waste trailers will be HEPA vacuumed and wet wiped with amended water, as necessary. The truck loading pads will be regularly inspected for integrity and disposed of as friable ACWM on a regular basis throughout the project.

A fully functioning personnel decontamination unit will be maintained onsite, connected to the RWA, for personnel entering and exiting the RWA. The decon unit must be used at all times, including site prep (not only when debris/soil-disturbing work begins), due to the site being a major asbestos spill. An air sample must be collected daily from inside of the clean room at all times during operation. The three-(3) stage decontamination chamber shall be constructed in a decontamination trailer in accordance with CDPHE Regulation No. 8, Section III.K, including 1 layer of 6-mil polyethylene sheeting on all surfaces in the "Clean Room", which must be adequately sized to accommodate the entire work crew, as well as their clothing and equipment. The clean room must maintain a negative pressure differential of the work area (exterior) to the clean room at all times, achieving a minimum, -0.02 inches of water column. A manometer or negative pressure recorder must be set up on the outside of the containment (exterior) to continuously measure the pressure differential. The differential of the work area (exterior) to the clean room must be recorded using a strip chart recorder or its equivalent. The manometer must be programmed with the current date, time and location, and must have an audible alarm that will sound when pressure drops below the minimum -0.02 inches' water column. The alarm function must be audible during active abatement. The "Equipment/Dirty Room" must be adequality sized

for storage of all the employees clothing, gear, equipment and tools at the end of each work shift. The decontamination unit must be established at the very beginning of the project, prior to entry into the RWA or any soil/debris disturbing activity. All crew members must properly enter and exit the RWA through the decontamination unit at all times. The decontamination unit must be set-up and fully functioning prior to any debris or soil-disturbing work being performed inside the RWA. Hot and cold potable running water shall be available and adjustable at the tap for worker decontamination. A negative air machine will be attached to the "Equipment/Dirty Room" of the decontamination unit and must be in use when workers are onsite and utilizing the decontamination unit. The air flow through the decontamination unit will be smoke-tested at the start of each work shift by the GACs Supervisor and documentation will be kept on-site. These records shall be made available for inspection. An air sample will be collected in the clean room of the decontamination trailer while in use, refer to *Section 6 Air Monitoring* for all air monitoring requirements.

Wastewater collected from the decontamination unit shower will be filtered down to 5 microns and disposed of in a sanitary sewer on the south side of the property. Under no circumstance will wastewater be reused to wet ACM or any material inside the RWA, wastewater (filtered or unfiltered) may not be reused for any purpose.

Entering and exiting the RWA shall be through the 3-chamber decontamination unit adjacent to the RWA, with all abatement workers in the RWA having Colorado Worker/Supervisor certification, including the equipment operators. A Colorado-certified asbestos abatement supervisor must be on site at all times during asbestos abatement work including site setup work and teardown. Upon leaving the RWA, disposable PPE will be removed and placed into an asbestos-waste container in the "Equipment/Dirty Room" of the decontamination unit. After placing the disposable clothing in the waste container (which is to be sealed at the end of each shift and disposed of as friable ACWM), workers will immediately proceed to the shower unit. The decontamination unit must be utilized each time workers enter and exit the RWA.

A diagram detailing the location and configuration of the RWA can be found in (*Exhibit D - Regulated Work Area Setup Plan).*

4.0 REMOVAL & LOADING OF ASBESTOS-CONTAMINATED DEBRIS

Prior to disturbance and loading of any asbestos-containing and asbestos-contaminated material or asbestos-contaminated soil (ACS), the debris/soil shall be adequately wetted with amended water. There are no fire hydrants on the directly adjacent to the RWA, however, there is a functioning well onsite to provide water for the abatement. This well will be utilized for a continuous source of water to fill the water trailer and water storage containers. The water storage containers will be staged around the work area, outside the RWA, equipped with a water pump, and minimum of 2-inch hose with an adjustable nozzle and backflow preventer. A portable water trailer equipped with a water storage tank, water pump, and minimum of 2-inch hose with an adjustable nozzle and backflow preventer will also be utilized to move around the site to provide closer access for wetting with amended water, all hose nozzles will be set to the misting position. The amendment/surfactant will be mixed into the water in the storage tank for controlled application, surfactant must be mixed at a ratio specified by the manufacture for the specific product used.

An air sample must be collected daily from inside of the clean room at all times during operation. The amended water must be applied on a mist setting at a pressure that does not generate fugitive dust, create splattering, or dislodge debris/soil at the point of contact. The debris/soil will be maintained adequately wet at all times during demolition, cleanup and loading activities. The

excavator bucket shall be equipped with a low-pressure water distribution system (also referred to as a "misting bar") that will utilize amended water for general dust suppression while debris is being handled by the excavator bucket, the "misting bar" is not intended to initially wet the material. The low-pressure (low-psi) water mist distribution system is a bar attached to the top of the excavator bucket with misters pointing to the cradle of the bucket to constantly mist points of contact for the bucket and debris that's in the bucket to avoid the release of asbestos fibers as waste is being carefully handled. The misting bar is intended to use amended water mist as general dust suppression while debris is being handled by the excavator bucket, it is not intended to initially wet the material. This device will be referred to as a "misting bar" throughout the remainder of this document and amended water is required to be used at all times. Area water storage containers and hoses must be equipped with back-flow prevention devices. The amended water will be distributed utilizing fire hoses, which are a minimum of 2" in diameter. Care must be taken to ensure that no interruption of the process of adequately wetting the debris will occur during a change in water supply.

The ACM debris will be adequately pre-wetted with amended water prior to removal and will remain adequately wet throughout disturbance and handling. Two (2) hoses will be used at all times during debris removal to wet material at the point of excavation/disturbance and the point of loadout. The two (2) hoses located at the point of excavation and the point of loading shall be set to the misting position at all times to suppress any potential fiber emissions that may be generated during the loading operation and to prevent over-watering of the waste container.

An excavator equipped with a grabbing thumb shall be utilized for debris loading, eliminating as much spillage as possible. The excavator must operate at lowest possible height during removal/loading in order to minimize freefall of debris. The misting-bar shall be attached to the excavator bucket to mist the debris at the point of contact. All debris must remain adequately wet with amended water prior to disturbance and throughout removal/loading. The excavator bucket will have a fill-limit of 2/3 full, and debris will be loaded slowly into the lined waste trailers to minimize spillage. The excavator operator and the on-site AMS will ensure that waste is placed gently into the waste trailers and not dumped or dropped as a measure to control dust emissions generated from the loading process.

The work will be conducted in a slow, controlled and methodical manner. Removal and loading operations shall to be performed in a piece-wise, and the methodical demolition shall occur from the top-down to maintain controlled debris handling. Pieces of debris will be directly loaded into lined truck trailers as it is removed, debris and stockpiles shall not accumulate. The ACM waste/debris will be not be tracked or driven over by any equipment at any time. The excavators will be equipped with a long enough boom and arm to keep the excavator off of the ACM debris during the removal/loading. The excavator will only enter the building footprint or debris areas when enough debris has been removed and loaded out so the excavator does not drive or track over any debris. All excavators and loading equipment will stay off of the building debris during operations. The work methods shall not include munching, sizing, processing or reducing the size of the debris. The lined truck trailers will be loaded in the designated loading area only. Disposal trucks will be placed a safe distance away from the impacted ACM materials to ensure a controlled placement of waste in the trailer is achieved.

Haul trucks shall have their HVAC systems turned off and the windows rolled up when inside the RWA, and the engines will be turned off during loading. The area around the trucks and the excavator swing radius will be protected with 10-mil reinforced polyethylene sheeting. The trucks will first be lined with one (1) layer of 6-mil polyethylene as a slip liner; the slip liner must cover

the entire length and width of the truck bed (not just one small strip down the center). The debris-wrap must consist of the equivalent of 1 layer of 10-mil reinforced polyethylene, then 2 layers of 6-mil polyethylene sheeting. Waste containers/truck bed liners must be constructed with no seams except at the sealing point. To seal the waste trailer, the two 6-mil polyethylene layers will be overlapped over the top of the debris and sealed with tape and spray-glue. The outside layer of 10-mil polyethylene will then be mechanically fastened at the sealing point by rolling the sheeting around wood strips then fastened with screws.

Excavation and loading activities will be conducted in a manner that prevents the rupturing of the leak-tight debris-wrap. At no time will packaging be allowed to rupture while loading or during transportation to the landfill. If a breach occurs, all loading, transportation and disposal will immediately cease and ridged cardboard such as builder board or Masonite® will be implemented to protect the polyethylene lining from punctures or tears. GAC personnel will be in PPE including disposable clothing, gloves and half-face respirators while handling and sealing asbestos waste inside of the RWA.

Once loaded, the sealed waste trailers will be labeled with pre-printed generator labels required by EPA's NESHAPs Standard 40 CFR Part 61, Subpart M, OSHA and DOT regulations. Any debris/soil that falls onto the trucks or the loading pad will be immediately cleaned up. The loading pad must be cleaned after each waste trailer is loaded. Each waste trailer, once sealed, will also be visually inspected by the AMS for dust and debris. Any surfaces with dust or debris will be HEPA vacuumed and wet wiped prior to the truck leaving the loading pad. If there is any dust or debris that is not removed by HEPA vacuuming and wet wiping, the trucks shall be washed down utilizing airless sprayers with amended water then wet wiped prior to the AMS's visual inspection. Airless sprayers shall be utilized to control the amount of water dispensed during washing of the trucks; all waste water shall be collected from the loading area, solidified with soil and disposed of as friable ACM waste. Transportation of ACWM to a CDPHE and EPA-approved landfill can only occur once the on-site AMS performs a visual inspection of the trucks, and no asbestos-related contamination is present. The visual inspection by the on-site AMS will consist of a thorough visual inspection of all surfaces of the waste trailer and associated truck including tires, fenders, mudflaps, truck/trailer tops and ledges. The wrapped and sealed ACWM in the trailer will be inspected to ensure it is sealed and there are no visible breaches caused by the waste or sealing procedure. The loading pad will also be visually inspected around and under the truck/trailer to ensure no dust or debris is present prior to any trucks/trailers leaving the loading area and RWA.

All asbestos waste generated at the site must be disposed of in an EPA- and CDPHE-approved landfill that accepts friable ACWM. Dispose of the wind screen as ACWM at the end of the project. The disposal truck driver or a representative of the landfill will report the integrity of each disposal container placed at the landfill to the GAC and the on-site AMS. A waste-disposal manifest will record the identity of the contractor and transporter, date of departure from the site, the address of the project where the waste originated, and the waste facility acceptance confirmation signature and date.

If the on-site AMS observes visible emissions of fugitive dust leaving the RWA, work will stop immediately and CDPHE will be notified. Demolition and loading will only continue once the work practices and engineering controls have been adequately altered to address and prevent emissions from leaving the RWA and the CDPHE has granted permission to resume work.

Breaching and spilling of ACM debris is a concern for the project and any instance of such will be addressed immediately upon discovery. Breaches in the polyethylene-lined soil berm will be

addressed by repairing and adding to the berm's soil structure if necessary, and a polyethylene-sheeting patch will be applied to any the breached section. Prevention is the first line of defense for liner breach. Waste will be placed in a lined trailer with care not to puncture or breach the lining, any rips or breaches will be immediately patched/repaired by tape and polyethylene sheeting as needed. If debris continues to punctures or breaches the waste lining, builder board or a comparable ridged cardboard will be installed inside the liner to protect the polyethylene sheeting. The debris will not be compressed with the bucket of the excavator once it is placed in the waste trailer. The AMS will monitor the operator as they perform this task. If a breach is discovered, the GAC will move to immediately apply a patch. If a liner cannot be successfully patched it will be off-loaded and the process will start over with a new liner. Breaches occurring during any other time of the process will also have a patch applied to them.

For spills (including fugitive dust emissions) that occur outside of the RWA, the following steps shall be taken:

- For any spills outside of the work area, in addition to the other requirements listed, all work must stop, daily logs, wind logs, and the presumed cause of the release must be submitted to CDPHE;
- All spills including fugitive dusts, regardless of the quantity of material involved, will be treated as a major spill;
- The CDPHE will be notified immediately; and

- A Corrective Action Plan (CAP) will be developed by the project team which must be reviewed and approved by the CDPHE prior to implementation. All CAP will be uniquely tailored to the specific details of the spill and corresponding circumstances.

If any CAP work practices change due to fugitive dust or any other reason, the CDPHE must approve any changes to the CAP prior to implementation.

The GAC will utilize the heavy equipment at the site in the following table:

Equipment Type	**Make/Model**	**Quantity**
Excavator	John Deer 210	1
Water Truck	Freight liner M2	1
500-Gallon Water Trailer with Pump and 2" Hose Couplings	Wylie EXP500SG	1

5.0 EQUIPMENT & SITE DECONTAMINATION

Decontamination of equipment and tools will be conducted on the loading/decontamination pad that controls run-off and prevents further contamination of the surrounding soil. The loading/decontamination pad will have a minimum of two (2) layers of 10-mil reinforced polyethylene sheeting on the ground which extends up the sides of the 6" berm. The dirt berm and polyethylene sheeting in the loading/decontamination pad will be set up in a manner that is effective in preventing the migration of contaminated water & debris outside of the loading area during cleaning of equipment and tools. These mitigation measures will be maintained in good working condition, and water will not be allowed to pool in the loading/decontamination pad area. Cleaning shall be performed with amended water, disposable rags, hand-scrapers, shovels, and HEPA-filtered vacuums. Used rags and vacuum bags must be containerized, sealed, labeled and treated as friable ACWM. Wastewater collected from the loading/decontamination pad will be filtered down to 5 microns and disposed of in a sanitary sewer on the south side of the site.

Water shall not be allowed to pool in the decontamination area. Upon completion of all removal activities, HEPA vacuuming and wet wiping of all cleanable building surfaces that remain, sidewalks and concrete foundations/slabs in the RWA. All equipment used during ACM removal will be decontaminated prior to receiving a visual inspection and sign-off conducted by the onsite AMS. Only certain hardscape materials such as foundation, slabs, and sidewalks may be cleaned (HEPA vacuumed and wet wiped with amended water), visually inspected and left intact. All debris from inside the RWA, including concrete, metal, wood, glass, plastic, polyethylene sheeting etc. will be disposed of as friable ACWM. A Colorado-certified AMS will be responsible for inspecting the RWA for the presence of any remaining asbestos-containing or asbestos-contaminated debris. Only the AMS can visually clear the work area and release decontaminated equipment from the RWA.

6.0 AIR MONITORING

Air sampling must occur during all active abatement activities and shall continue until the project has been visually cleared by the AMS, including the sign-off on all decontaminated equipment.

A. Perimeter/Area Air Samples

Air samples will be collected by a CDPHE-certified AMS to assist in determining the effectiveness of work practices and the adequacy of engineering controls employed during removal and loading of ACM debris and ACS. Perimeter/Area air samples must be collected during **all abatement activities** (including site preparation, removal and cleaning) until final visual inspection is passed and equipment decontamination is complete. Air samples will be collected inside the RWA and wind fence and will be situated to surround the active workface in as close proximity to the work as possible, without causing physical damage to the air sampling pumps, endangering the AMS, or impeding the abatement activities.

Eight (8) Perimeter Air Samples will be Collected Daily:

- Four (4) perimeter air samples shall be collected around the ongoing loading operation, at least 180 degrees surrounding the active portion of the work area (inside the RWA not on the wind fence or outside of it)
- One (1) perimeter air sample will be collected to the south of the work area (inside the RWA, east of Structure 8 and south of the Structure 7).
- One (1) perimeter air sample shall be collected on the east of the work area (inside the RWA, on the south-east end east of Structure 6 of the RWA).
- One (1) perimeter air sample shall be collected on the north-west side of the RWA (inside the RWA, north-west of Structure 7 and north-east of the decontamination trailer).
- One (1) perimeter air sample shall be collected to the north-east of the work area (inside the RWA, south of Structure 4 and south-east of structure 5).

One (1) Area Air Sample will be Collected Daily:

- One (1) area air sample shall be collected from inside the clean room of the decontamination trailer (inside the clean room, on the north-west side of the RWA). The air sample in the clean room of the decontamination unit must be collected at all times when the trailer is being used. Therefore, this air sampling is required during the pre-abatement site preparation portion of the project.

The air sample locations listed above are starting approximations based on the proposed waste-loading plan. Air sample locations will move daily as active work progresses, and placement will be documented by the on-site AMS. Air samples will be collected on 25-mm, 0.45-micron Mixed Cellulose Ester (MCE) filtered cassettes. All perimeter/area air samples and blanks will be analyzed by TEM presence/absence for asbestos by a NIST and NVLAP accredited laboratory.

If at any time the work-area control measures prove to be inadequate due to the presence of visible emissions leaving the RWA, all operations will cease, and work methods and engineering controls shall be evaluated and altered to accomplish confining all visible dust within the RWA.
Detections of asbestos fibers during TEM analysis must be followed by a stoppage of work, immediate notification and submission of the following to the CDPHE Air Pollution Control Division (APCD):

- Photos of current site conditions;
- Map of sample locations (highlighting the sample(s) with detection of fibers)
- Lab data
- Daily field notes
- Wind speed logs
- Letter describing the possible source of detection
- Corrective Action Plan (CAP) submitted to the CDPHE/APCD for approval.

Abatement/demolition work may resume after CDPHE grants written approval of the CAP.

The on-site AMS will maintain daily air-monitoring logs. Daily air monitoring samples will be delivered to the laboratory for rush analysis. Verbal results will be given to the on-site AMS from the laboratory upon completion of analysis. Sample results will be posted on-site as soon as they are made available by the laboratory. An electronic version of the results will be kept onsite at all times for inspection and review. If results are not received by 12:00 pm (MST) the following business day after submission, all abatement activities will pause, and no abatement activities can resume until negative verbal air-sampling results are received from the laboratory.

B. Point-of-Operation Air Samples

Three (3) Point of Operation (POS) Air Samples will be Collected Daily:
Air samples will be collected by a Colorado-certified AMS on 25-mm 0.45-micron Mixed Cellulose Ester (MCE) filtered cassettes. All point of operation air samples will be analyzed by TEM presence/absence analysis for asbestos by a NIST and NVLAP accredited laboratory.

Point-of-operation (POS) air samples will be collected daily on at least three (3) different workers or 25 percent of the workers, **whichever is greater**, who are expected to have the greatest exposure (worst-case) to asbestos fibers during abatement activities, including the equipment operator(s), truck liners, and fire-hose operators. The excavator operator will be required to have 1 of the POS samples on at all times when the excavator is being used in the day's activities. The number of point-of-operation air samples collected daily will be determined by the number of workers in the RWA and types of ongoing activities.

If TEM sample results show the presence of asbestos fibers, all work must stop and CDPHE must be notified immediately. The notification shall include photographs of the current site conditions, a map of the air sample locations highlighting the positive sample(s), laboratory analytical data, daily AMS field notes (including wind logs), and a letter of explanation describing the likely

source of asbestos-fiber detection along with a Corrective Action Plan (CAP). Active abatement activities shall not resume until the CDPHE provides written approval of the CAP.

The on-site AMS will maintain daily air-monitoring logs. Daily air monitoring samples will be delivered to the laboratory for rush analysis. Verbal results will be given to the on-site AMS from the laboratory upon completion of analysis. Sample results will be posted on-site as soon as they are made available by the laboratory. An electronic version of the results will be kept onsite at all times for inspection and review. If results are not received by 12:00 pm (MST) the following business day after submission, all abatement activities will pause, and no abatement activities can resume until negative verbal air-sampling results are received from the laboratory.

Please refer to *Exhibit D – Regulated Work Area Setup Plan* and *Exhibit E – Excavator Demolition Progression Plan* to show beginning locations of active air samples and progression of the air samples following the demolition as described in this section.

7.0 WIND MONITORING & SHUTDOWN CRITERIA

Wind speeds will be measured utilizing a NIST-traceable, handheld anemometer instrument, calibrated by the manufacturer. The AMS will continuously monitor and record wind-speed readings every 15 minutes at a minimum. Wind-reading recordings may be necessary more frequently than every 15 minutes during windy conditions. The on-site AMS will document all wind speeds and prevailing directions in the daily air-monitoring logs. Wind-speed measurements will be taken outside of the windscreens in areas of close proximity to the work being conducted, representative of the conditions inside the RWA where ACM/ACS is being managed.

Demolition and loading operations shall immediately stop when **one (1) or more** of the following conditions are present:

1) A sustained wind speed of 12 mph, averaged over a 10-minute period, as recorded by the AMS with a hand-held anemometer instrument;
2) Wind gusts exceed 20 mph, as recorded by a hand-held anemometer instrument;
3) Winds are producing visible emissions or creating movement of dust in the RWA; or
4) Winds are impacting the ability of the onsite engineering controls to function as designed.

In the event of work stoppage due to excessive wind speed or wind gusts, workers will immediately wet the areas of debris with amended water to prevent migration of any dust or fibers from the RWA. Other onsite work activities not involving the impacting of ACM/ACS may continue when abatement and demolition work is stopped due to any of the above wind conditions.

If work is stopped due to wind-related conditions, demolition and loading activities may continue only after **all four (4)** of the following conditions have been met:

1) All wind-gust readings drop below 20 mph for a period of 20 minutes;
2) Sustained wind speeds are below a 12-mph average, measured over a 20-minute period;
3) Winds no longer produce visible emissions or create movement of dust in the RWA; and
4) Winds are not impacting the ability of onsite engineering controls to function as designed.

8.0 FINAL VISUAL INSPECTION

Once the demolition, loading and removal of all asbestos-containing debris and ACS is complete, final cleaning has been conducted and all elements that remain onsite are completely dry, a Colorado-certified AMS shall perform a Final Visual Inspection throughout the RWA to evaluate whether any suspect ACM debris remains. All polyethylene sheeting from the loading areas and will be removed prior to the final visual inspection. The berms must be left intact until the initial visual inspection is passed. Once this inspection has passed, the berms can be removed, and the area beneath must be visually inspected by the AMS to ensure there is no waste or debris under the berms. Any hardscape such as concrete foundations, asphalt roads, and sidewalks within the RWA will be visually inspected for suspect ACM debris after final cleaning. A minimum of 2-inches of underlying soil must be removed from areas of vegetation or soil within the RWA. If removal of more than 2-inches of soil is necessary to remove all contamination from impacted soil areas within the RWA, this process shall be repeated until no further suspect ACM debris is observed on the surface of the soil. To facilitate visually clearing the RWA, the AMS will divide the work area into grids. Each grid will be walked in a serpentine manner and visually inspected to ensure the exposed soil and hard-scaped surfaces are free of any and all suspect ACM debris. Each grid will be demarcated with pin flags or marking paint and documented once a successful visual clearance has been determined by the AMS.

Under no circumstance shall a piece of equipment (notwithstanding hand tools) be removed from the RWA until it has been visually inspected and signed-off on by the onsite AMS. While still on the decontamination pad the excavator and heavy machinery will be cleaned by hand tools (including non-mechanical chisels, picks and scrapers) to remove any gross debris/dirt/mud then the machinery will be washed down with amended water and wiped free of dust and debris on all exterior surfaces including the tracks and bucket. The interior of the excavator cab will be HEPA vacuumed and wet wiped with amended water as part of the decontamination as well. The cleaning of the excavator, machinery and equipment must be performed on the decontamination pad, and all debris and water generated during the cleaning process be collected and properly disposed of. All equipment, tools and machinery will be visually inspected by the AMS to ensure each piece is free of mud, dust and/or debris following completion of the work and prior to leaving the RWA.

The project will be considered completed when all surface grids have been visually cleared by the AMS, and no visible suspect ACM debris or polyethylene sheeting remains within the RWA. Additionally, the decontamination pad, soil berms, decontamination chamber and perimeter wind fencing will be cleaned and visually cleared of any mud, dust and/or debris by the AMS prior to clearance and teardown of the RWA.

9.0 COLD WEATHER WORK PLAN

Cold Weather Work Plan

This section contains added requirements for conducting asbestos abatement activities in extremely cold, outdoor conditions. This is a common occurrence in Colorado, often presenting significant challenges in protecting the environment and workers. Any work performed when the exterior temperature is 32° Fahrenheit (F) or below triggers the use of this cold weather work plan. This cold weather work plan must be utilized when the exterior temperature is between 17°-32° F. All work must stop if the exterior temperature is below 17° F. When temperatures return to between 17°-32°F, work may resume under this cold weather work plan.

Wetting Procedures & Freeze Prevention

To ensure constant, continuous application of amended water during asbestos abatement activities in cold weather or freezing conditions, water supply or delivery systems shall not be allowed to freeze up. The GAC Shall ensure sufficient water flow through implementing the following:

1. Mix bio-degradable SPLASH Premium RV & Marine Antifreeze -75° with water in the water truck and trailer tanks according to the manufacture's specifications. After the antifreeze and water are mixed and the total volume of liquid is generated, add the surfactant according to the manufacture's recommendations calculated based on the total amount water/antifreeze mixture so it maintains the proper ratio for amended water. Once the amended water is properly mixed in the tanks, immediately prime the hoses and delivery nozzles to prevent freezing during storage and delivery. **Pre-mixed or ready to use surfactants are not approved for this application**;
2. Insulating exposed tanks, hydrants and tap connections;
3. Applying heat tape to exposed water hoses/above-ground supply lines at freeze points;
4. Draining water hoses/supply lines daily after each shift;
5. Storing hoses in a heated area overnight;
6. Heating shower and change areas, both for worker safety and to prevent freezing of the water supply. This includes applying heat tape or heating cables on hoses/supply lines for the shower of the decontamination unit;
7. Increasing hot water storage/delivery to the shower of the decontamination unit to ensure an adequate amount of hot water for all people in the RWA to properly decontaminate;
8. Not allowing amended water to stand for more than a few minutes on the ground during ACS abatement; and
9. Spraying affected surfaces with a consistent application shortly before and during excavation activities, and minimizing water application to only those surfaces being actively worked. Do not pre-wet areas that will not be actively being managed during that shift.

Soil Insulation

Insulate soil areas scheduled to be worked the following day by covering surfaces with polyethylene sheeting. This will provide a few degrees of added warmth as well as reducing overnight frost accumulation. If work must proceed after overnight temperatures of 17° or less, substitute insulated concrete blankets for polyethylene sheeting. Polyethylene sheeting if utilized will be disposed of as ACWM directly after use and if concrete blankets are used for extra ground protection they will be disposed of as ACWM at the conclusion of the project.

Worker Protection

Aside from heating the decontamination area as described above, workers shall use double-suiting to provide a layering effect. If disposable Tyvek® (or comparable brand) suit layers are not sufficient to keep workers warm, or operating temperatures are below 20°F, the GAC shall supply insulated cloth coveralls to provide a further layer of protection. Cloth coveralls used in the RWA shall remain in the Equipment/Dirty Room of the decontamination unit when not in use, handled as asbestos contaminated clothing, and disposed of as ACWM at the conclusion of use or the project.

Provide waterproof ponchos or rain gear for workers applying amended water or working in close proximity to water application. Provide insulated, waterproof gloves to all workers. Gloves, head coverings, and other worker PPE shall remain in the Equipment/Dirty Room of the decontamination unit when not in use, handled as asbestos contaminated clothing, and disposed of as ACWM at the conclusion of use or the project.

APPROVED
By Jeffrey Wolfe at 6:25 pm, Jan 19, 2026

The Equipment/Dirty Room and Clean Room of the decontamination unit shall remain above 40°F at all times during work hours, as this provides workers within the RWA a space to recover body heat. Rotate workers to allow each a 10-minute warming break every 1-1.5 hours, or more frequently as necessary, depending on extremity of cold conditions. The Clean Room must be sized to accommodate warming breaks, cold weather clothes, and cold weather PPE of the work crew. The Equipment/Dirty Room must be sized to accommodate storage of asbestos-contaminated cold-weather clothes and asbestos-contaminated cold-weather PPE of the work crew.

Equipment Protection
Use electric block heaters to prevent solidification of fuel. After warming the engine to operating temperatures, slowly test the range and operation of all mechanical and hydraulic functions.

If temperatures are single digit or below, engine-block heaters may not be sufficient for safe operation of diesel engines. Only attempt performance if operations are critically necessary. Delay any other activities until temperatures are safe for operation.

10.0 SUBMITTALS

Daily logs of work activities will be recorded and maintained by the on-site AMS. The logs shall include air monitoring locations, TEM lab results, wind-speed records, all incidents of visible emissions, equipment utilized, work performed, problems encountered, equipment decontaminate inspections by regulators, and pertinent information regarding the project.

The GAC will also prepare daily logs of all work activities, including employee training and certifications, medical records, applicable permits, notifications, variances, inspections by regulators, work performed, problems encountered, waste-disposal manifests, and any other project-relevant information.

Thank you for your assistance in reviewing and approving this variance request. If you have any comments or questions, please feel free to contact me at your convenience at our office (303) 286-9094 or my cell (720) 369-6609. I can also be reached via email at chris@dsconsultinginc.com.

Chris Lehman
Project Designer / Air Monitoring Specialist - Certification #14348
DS Environmental – Asbestos Consulting Firm registration #14912

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

EXHIBIT A: SITE LOCATION MAP

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

Exhibit A - Site Location Map

Alyor Property Structures
13981 Quebec St.

Radio Tower
~224 ft. NW of RWA

Soil Stockpile from Library Construction

Approximate Location
of the RWA

Fire Hydrant

Residential Structures
13856-13970 Locust St
~986-1,090 ft. West of RWA

Commercial Property
13955 Quebec St.
~994 ft. East of RWA

Residential Property
13941 Quebec St.
~979 ft. East of RWA

Storm Sewer Inlet

Anythink Nature Library
Construction Site
6811 E Quebec St.
~2,056 ft. South of RWA

Sanitary Sewer Access

Fire Hydrant

Storm Sewer Inlet

13970
13948
13936
13918
13902
13892
13884
13874
13866
13856

Quebec St
High Plains Water Association
Quebec St
E. 138th Avenue
Monaco St.
E. 136th Avenue

N

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

DS Environmental CONSULTING

EXHIBIT B: SITE CONDITIONS PHOTO DOCUMENTATION

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

	
Description: Overview of the Buildings onsite looking NW	**Description: Overview of the Buildings onsite looking NW**
	
Description: Telecommunications Radio Tower	**Description: Structure 3, vents and roof of the sub-terranean structure**

Description: Structure 3, center vent area collapse

Description: Structure 3, center vent area collapse

Description: Structure 3, entry stairs blocked by cave-in

Description: Structure 3, center vent area entry stairs wall collapse

Description: Structure 5, west side

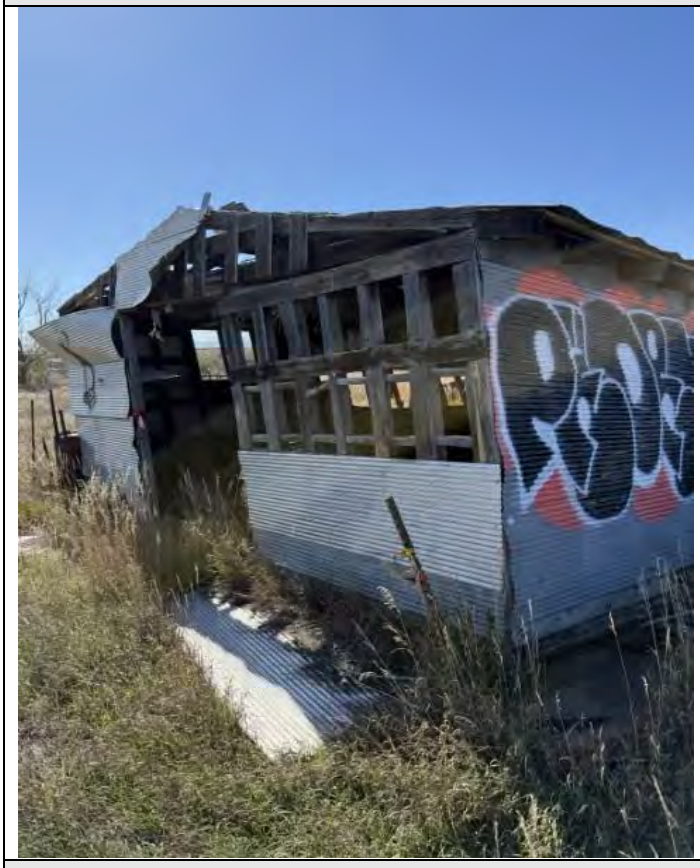
Description: Structure 5, west side collapse & debris

Description: Structure 5, west side collapse & debris

Description: Structure 5, west side collapse & debris

Description: Structure 5, east side

Description: Structure 6, east view, south side, visible lean to the structure

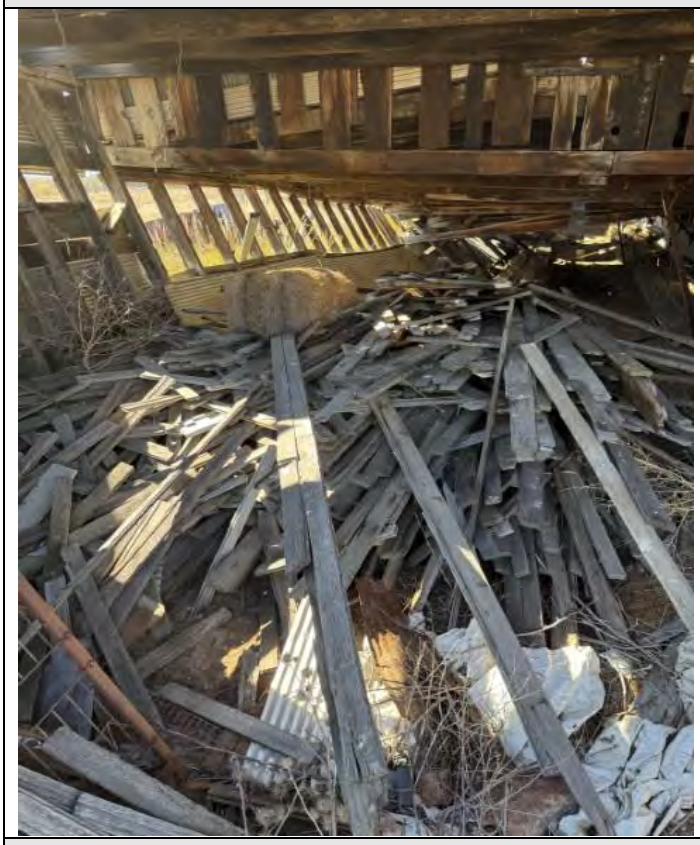


Description: Structure 6 west end

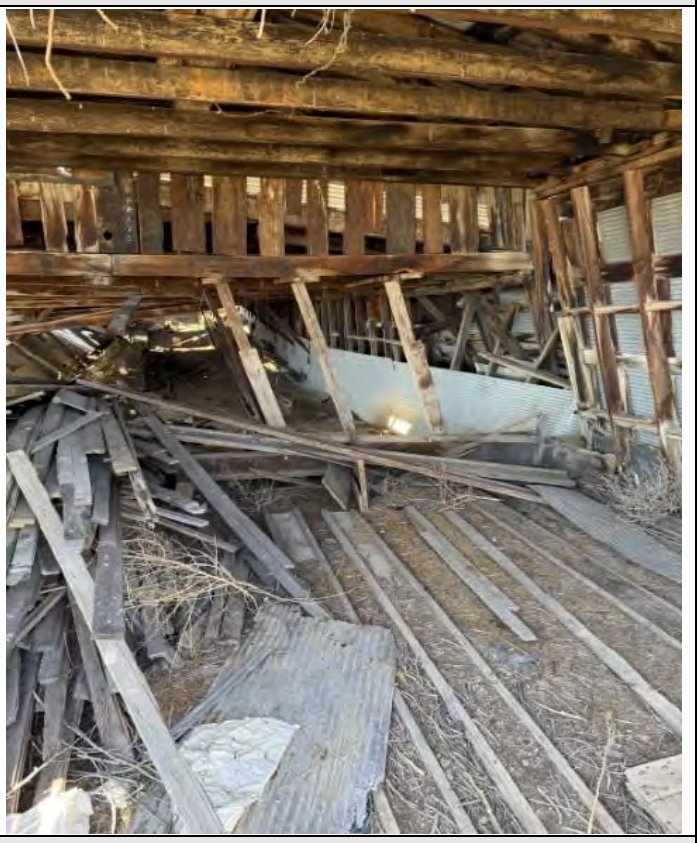
Description: Structure 6, east view, north side, visible lean to the structure

Description: Structure 6, east view, south side, visible lean to the structure, area of slow active collapse

Description: Structure 6, center, area of slow active collapse



Description: Structure 6, east end of inside



Description: Structure 6, east end of inside

Description: Structure 6, west end of inside

Description: Structure 7, NE corner that is collapsing, north view

Description: Structure 7, NE corner that is collapsing, south view

Description: Structure 7, west side

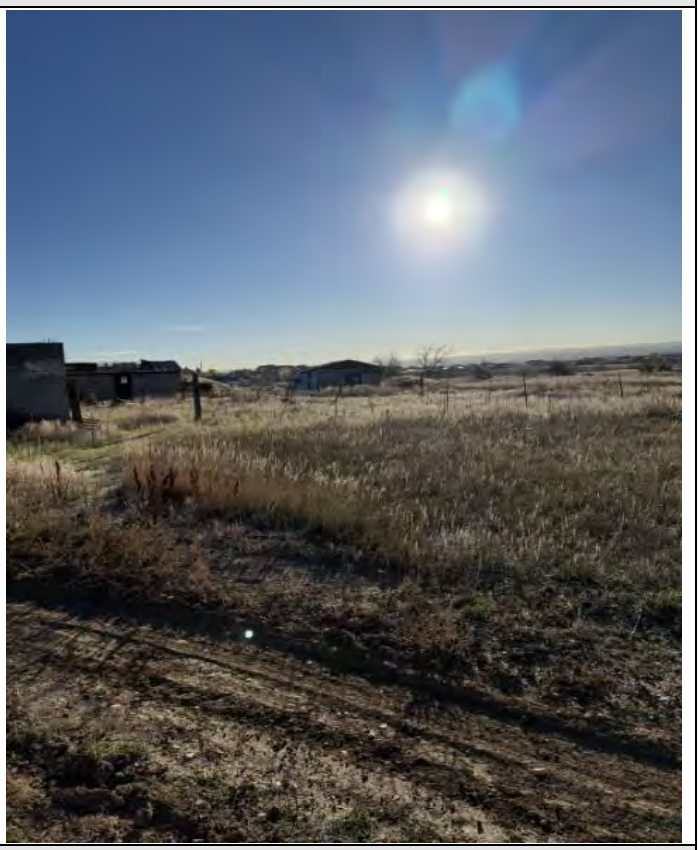
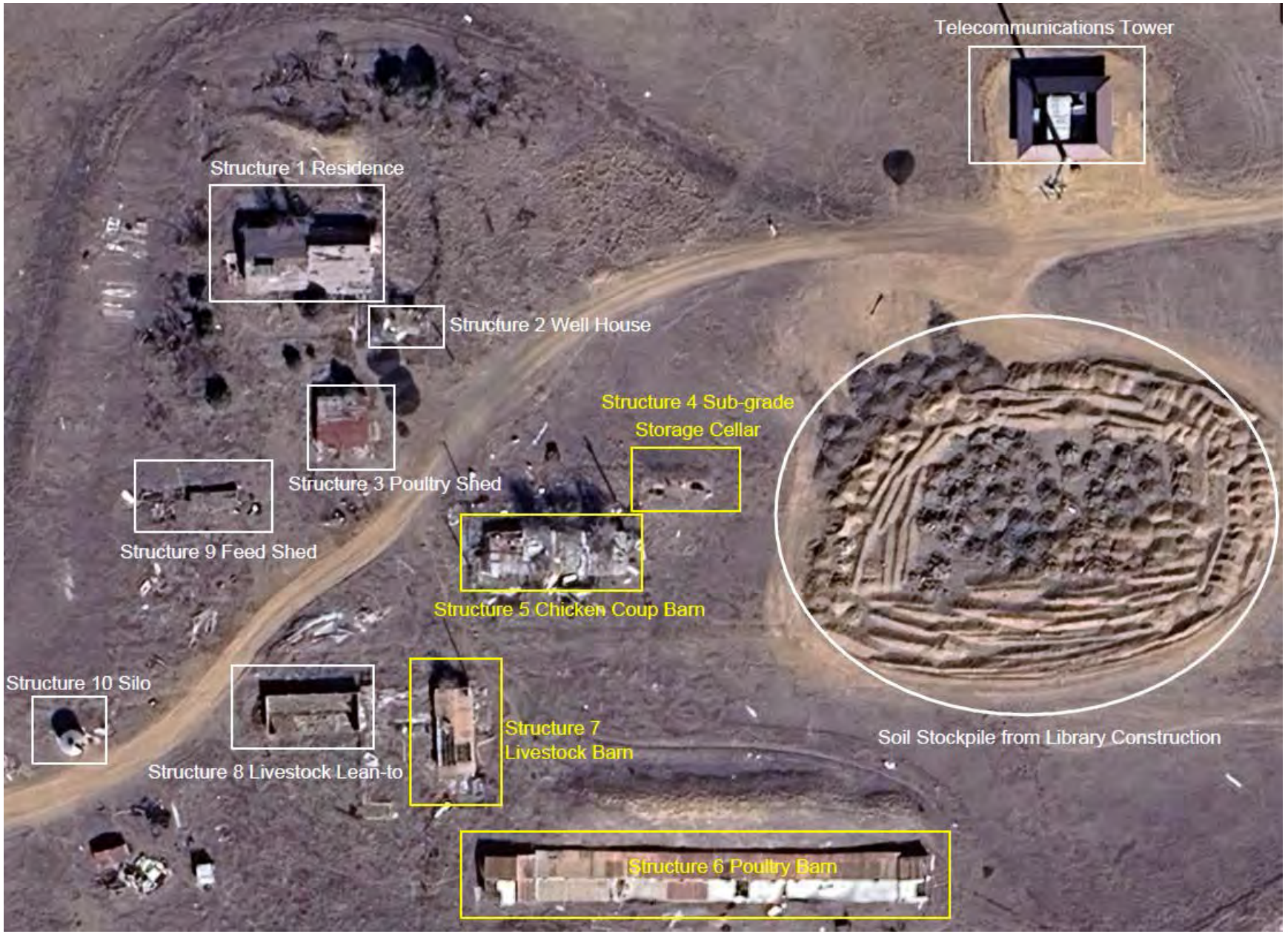
	
Description: Structure 7, north “tack” room interior	**Description: Structure 7, north-center “tack” room interior**
	
Description: Haul road facing west	**Description: Haul road facing east**

EXHIBIT C: BUILDING SITE MAP

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026



APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

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Exhibit C – Building Site Map

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EXHIBIT D: REGULATED WOK AREA SETUP PLAN

APPROVED
By Jeffrey Wolfe at 6:26 pm, Jan 19, 2026

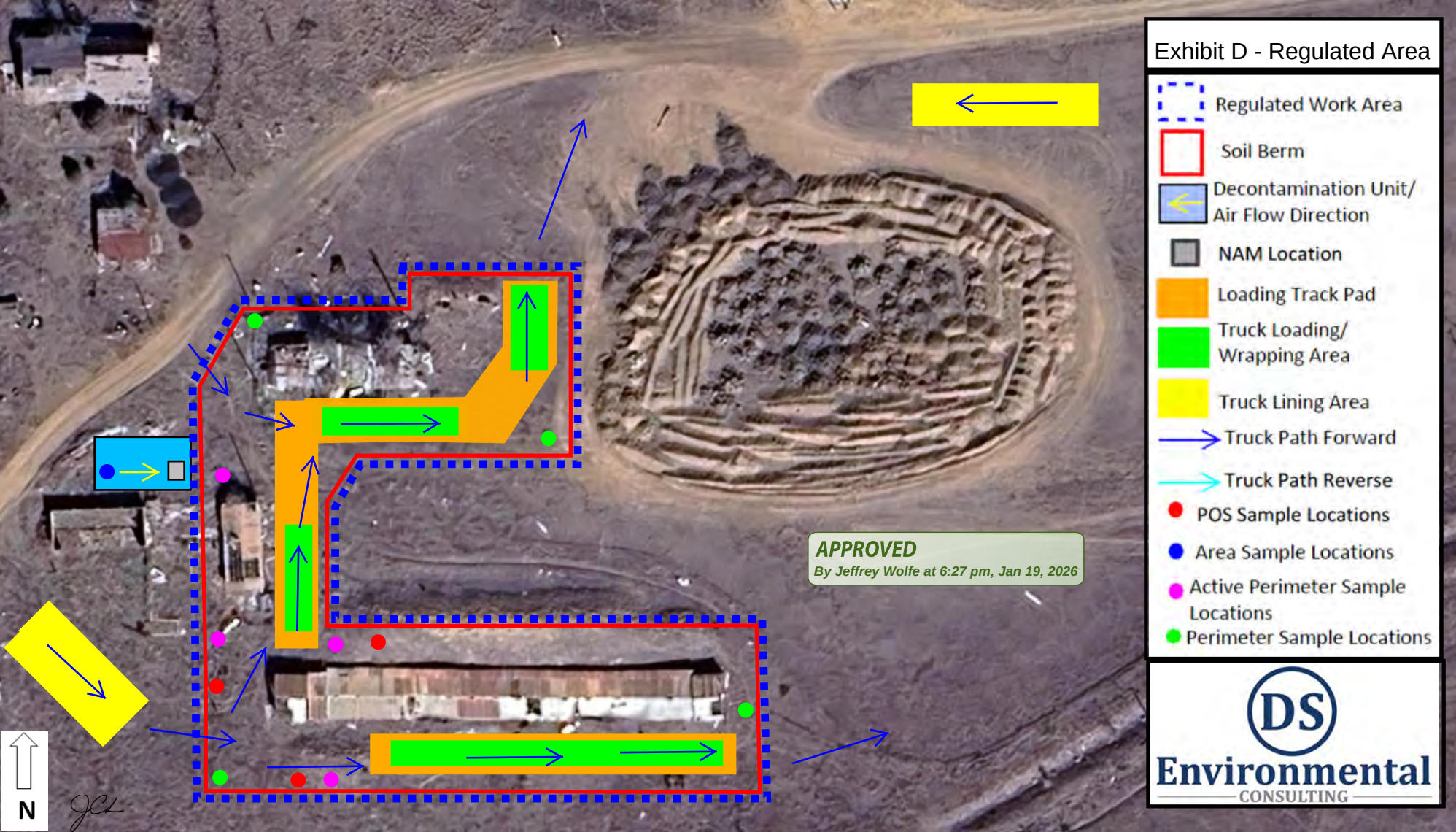
Exhibit D - Regulated Area
Regulated Work Area
Soil Berm
Decontamination Unit/
Air Flow Direction
NAM Location
Loading Track Pad
Truck Loading/
Wrapping Area
Truck Lining Area
Truck Path Forward
Truck Path Reverse
POS Sample Locations
Area Sample Locations
Active Perimeter Sample
Locations
Perimeter Sample Locations
APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026
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EXHIBIT E: EXCAVATOR DEMOLITION PROGRESSION PLAN

APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026

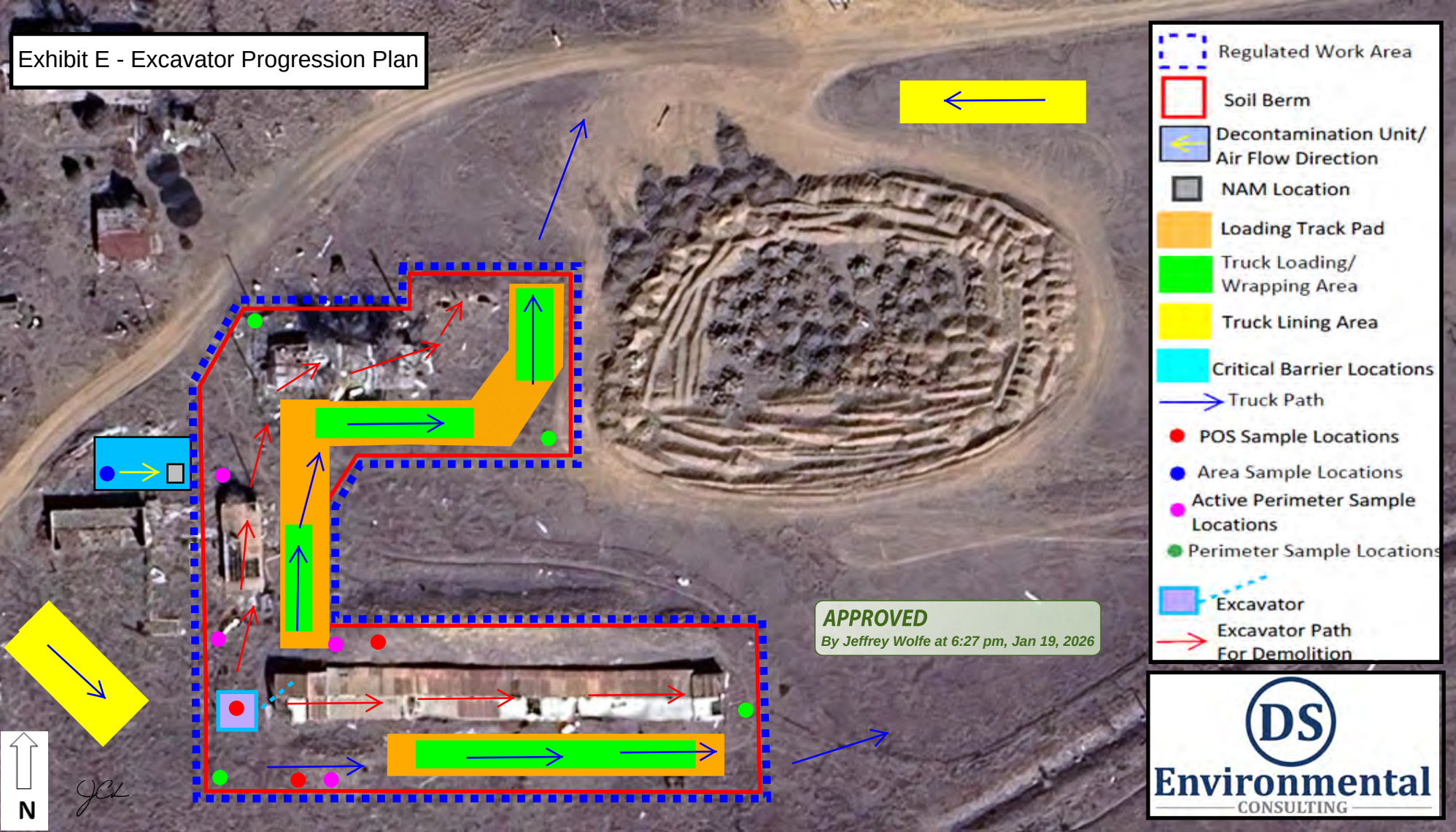
Exhibit E - Excavator Progression Plan
Regulated Work Area
Soil Berm
Decontamination Unit/ Air Flow Direction
NAM Location
Loading Track Pad
Truck Loading/ Wrapping Area
Truck Lining Area
Critical Barrier Locations
Truck Path
POS Sample Locations
Area Sample Locations
Active Perimeter Sample Locations
Perimeter Sample Locations
Excavator
Excavator Path For Demolition
APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026
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DS Environmental CONSULTING

EXHIBIT F.1: STRUCTURALLY UNSOUND DETERMINATION LETTER

APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026

Wiss, Janney, Elstner Associates, Inc.
14123 Denver West Parkway, Suite 200
Golden, Colorado 80401
303.914.4300 tel
www.wje.com

November 25, 2024 (revised September 14, 2025)

Mr. Patrick Hinterberger
Contracts Supervisor
City of Thornton
9500 Civic Center Parkway
Thornton, Colorado 80602

Aylor Open Space

Existing Structures Assessment – Structurally Unsound and in Danger of Imminent Collapse
WJE No. 2024.4958

Dear Mr. Hinterberger:

At your request, and in accordance with our August 29, 2024 proposal, Wiss, Janney, Elstner Associates, Inc. (WJE) has completed a limited structural assessment of the existing structures located on the Aylor Open Space. This letter summarizes our observations and assessments of the structures that we have determined to be *structurally unsound and in danger of imminent collapse*.

BACKGROUND

The City of Thornton (the City) owns the property that is proposed to become the Aylor Open Space, which is located west of Quebec Street and north of East 136th Avenue. Currently, the property features thirteen structures that were formerly part of a working farm prior to the property being deeded to the City. The thirteen structures include twelve above-grade and one underground. The ages of the structures are unknown.

As we understand, the City is planning to demolish the twelve above-grade structures, which have been determined to contain various levels of asbestos, requiring proper abatement before demolition. Given the readily observable varying degrees of distress in the structures, the City requested a structural assessment of each to determine if they are safe to enter to complete the abatement work. Additionally, the City requested a structural assessment of an underground cellar to determine the feasibility of salvaging it for future use.

Each structure was assigned a corresponding name and number for reference in our proposal, dated August 29, 2024. This letter, as well as all subsequent communication, will continue to apply the same name and number references. A map of all structures assessed is provided in Figure 1.

ASSESSMENT

WJE visited the site on October 24, 2024 to complete a general observation and assessment of each structure. The determination of either *safe* or *unsafe for entry* was based solely on the condition of readily visible framing and structural members. Our assessment considered only whether the structure was *safe to enter* or *unsafe to enter* for routine abatement purposes and should not be construed as an opinion regarding habitability, occupancy, or other long-term use due to being structurally unsound and in

danger of imminent collapse. WJE reserves the right to modify or amend our opinions in the case of future loading events such as high winds or heavy snows or if the planned abatement procedures have not proceeded within 12 months of the issuance of this letter.

Of the thirteen structures assessed, six were deemed to be *structurally unsound and in danger of imminent collapse* for asbestos abatement purposes. A list of these structures and relevant observations is provided below.

4 Chicken Coop

The Chicken Coop is located south of the Original Farmhouse (#1), southwest of the Garage (#3), and measures approximately 20-feet by 10-feet in plan (Figure 2). The structure is constructed of typical wood stud-framed walls with dimensional lumber roof rafters. Board sheathing is used for both the walls and roof, although the actual roofing material was missing. Interior finishes were not present, leaving the structural members readily visible.

The structure exhibits an obvious and significant lean to the south, and the middle portion of the north edge of the roof is deflecting noticeably (Figure 3). In addition, some of the structural members show signs of deterioration. Due to the observed lean, deflection, and deterioration, WJE did not enter the structure for further evaluation, and we have deemed it to be structurally unsound and in danger of imminent collapse.

5 Outbuilding #1

Outbuilding #1 is located east of the Chicken Coop across the property's dirt road (Figure 4). It measures approximately 30-feet by 90-feet in plan and is constructed of unreinforced concrete masonry unit (CMU) walls with dimensional lumber roof rafters covered with board sheathing. Interior finishes were not present, leaving the structural members readily visible (Figure 5).

Many wood rafters were broken and/or deflecting noticeably. Additionally, the west wall has collapsed, resulting in a subsequent partial roof collapse in that area (Figure 6). The north and south walls exhibited noticeable leans, while the east wall exhibited some stairstep cracking. The roof on the east half of the structure contains several large holes and is beginning to collapse (Figure 7). Due to the observed lean, partial collapses, and general state of masonry walls, WJE did not enter the structure for further evaluation. The structure is deemed structurally unsound and in danger of imminent collapse.

8 Outbuilding #2

Outbuilding #2 is located south of Outbuilding #1 and measures approximately 20-feet by 40-feet in plan (Figure 8). Like Outbuilding #1, the structure is constructed of unreinforced CMU walls with wood trusses partially clad in metal roof panels. Interior finishes were not present, leaving the structural members readily visible.

The wood roof trusses remain largely intact, although some appeared to be deflecting noticeably and showed signs of deterioration (Figure 9). The north half of the east wall had collapsed, while

the remaining walls exhibited some stairstep cracking (Figure 10). Due to the observed roof deflection and partial wall collapse, WJE did not enter the structure for further evaluation, and the structure is deemed structurally unsound and in danger of imminent collapse. Wires appearing to be either electrical power or telephone service enter the structure on the north side (Figure 11). WJE cannot comment on the safety of these components and recommends that other professionals be contacted for recommendations on safely working around these wires during demolition.

10 Outbuilding #3

Outbuilding #3 is located south of the Camper and measures approximately 10-feet by 10-feet in plan (Figure 12). It was constructed of typical wood framing covered with board sheathing and has almost entirely collapsed towards the northwest corner (Figure 13). Due to the collapse, WJE did not enter the structure for further evaluation. The structure is structurally unsound and has already collapsed.

12 Hen House

The Hen House is the largest structure on the property, measuring approximately 20-feet by 240-feet in plan (Figure 14). It is located south of Outbuilding #2 and is partially inset into the earth. The structure is constructed of typical wood framed walls with wooden trusses used for the roof. Both the walls and roof are clad in corrugated metal panels that were intermittently missing or displaced. Interior finishes were not present, leaving the structural members readily visible.

Many structural members were broken, deflecting noticeably, or were showing signs of deterioration (Figure 15 and Figure 16). The overall structure exhibits a noticeable and significant lean, appearing to only be supported by the adjacent earth in some areas, while the north wall is beginning to bow inwards (Figure 17 and Figure 18). The roof has partially collapsed in multiple locations, resulting in occasional punctures of still-standing vertical members (Figure 19). Due to the noticeable lean, deflection, and partial collapse, WJE did not enter the structure for further evaluation. The structure is structurally unsound and in danger of imminent collapse.

13 Cellar

The Cellar is located northeast of Outbuilding #1 and appears to measure approximately 10-feet by 30-feet in plan (Figure 20). The exact depth of the Cellar is unknown, although observations from grade appear to show the floor of the Cellar is approximately 7 to 8-feet below grade. The main entry faces east and is constructed of what appears to be lightly reinforced concrete walls that have broken into several large pieces, displaced noticeably, and partially collapsed (Figure 21).

To the west, the Cellar roof has partially caved in, resulting in an approximately 4-foot by 4-foot hole at grade. From this hole, the roof structure of the Cellar is partially visible, appearing to be constructed of dimensional lumber beams covered in board sheathing (Figure 22). Photographs taken from the main entry also appear to show dimensional lumber beams and columns supporting the roof and, in addition, appear to show a concrete wall supporting at least one side of the Cellar

(Figure 23). Due to the partial collapse of the entry and the cave in on the west side, WJE did not enter the structure for further evaluation.

To properly evaluate the proposed salvaging of the Cellar for future use, further investigation of the existing structure needs to be completed. In its current state, the Underground Cellar is structurally unsound, in danger of imminent collapse, and not safe for entry, including for investigative purposes. If further investigation is requested by the City, WJE recommends that a qualified contractor install temporary shoring at the entry, around the roof cave in, and throughout the structure where appropriate. In addition, debris from partially collapsed areas of the structure as well as other, non-structural items currently housed in the Underground Cellar should be removed to facilitate entry. WJE is available to assist with access planning, design of shoring, and further investigation if requested.

CLOSING

We appreciate the opportunity to be of service to the City of Thornton and we are available to discuss this letter with you in more detail should you have any questions.

Sincerely,

WISS, JANNEY, ELSTNER ASSOCIATES, INC.

Andrew P. Stam, PE
Senior Associate

FIGURES

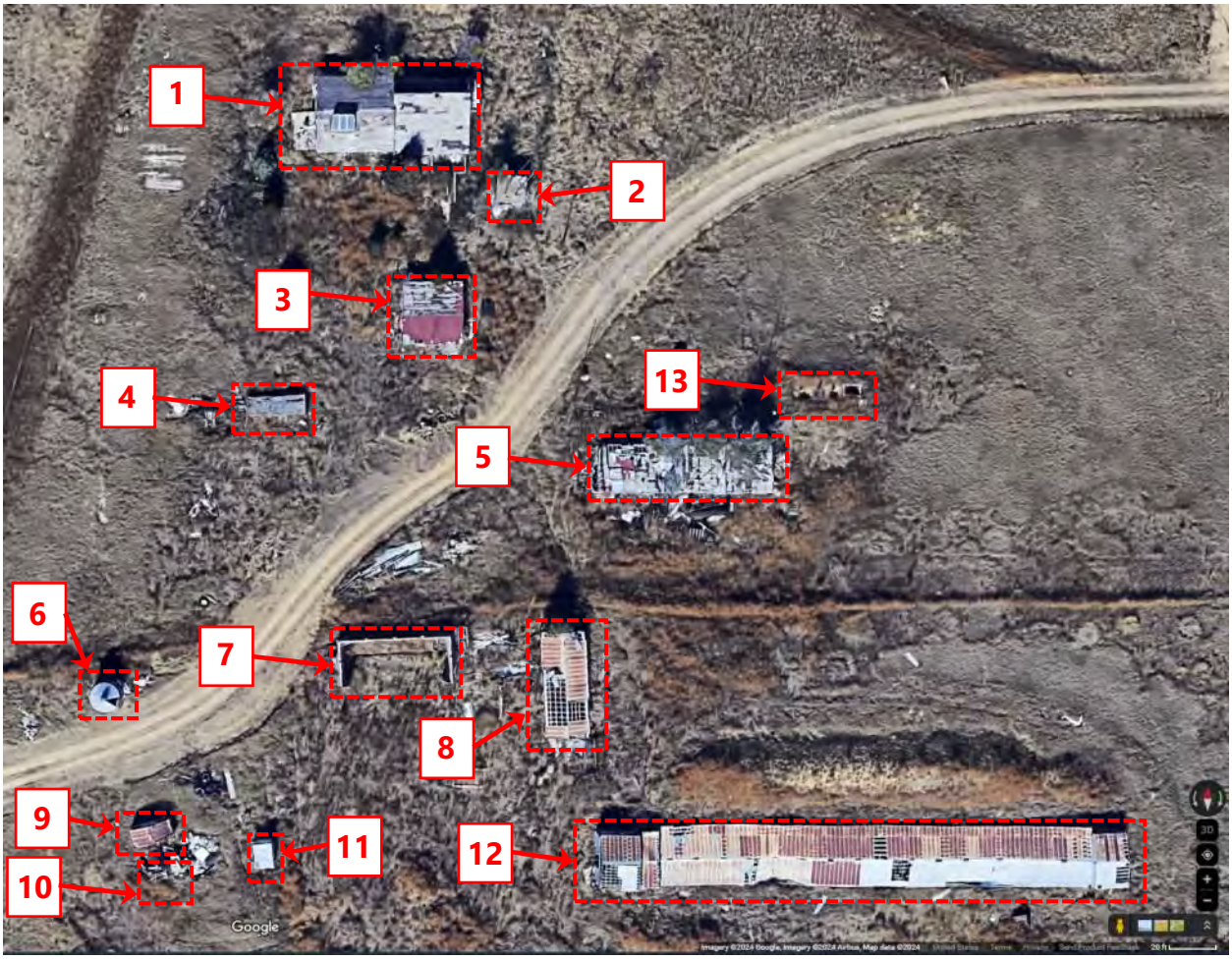


Figure 1. Twelve structures (#1-12) and an underground cellar (#13) on the Aylor Open Space. © Google.
The structures referenced in this letter are 4, 5, 8, 10, 12, and 13.

Figure 2. Overall view of the Chicken Coop from the south.

Figure 3. Interior view of the Chicken Coop showing a noticeable lean.

Figure 4. Overall view of Outbuilding #1 from the southwest corner.

Figure 5. Readily visible structural members of Outbuilding #1.

Figure 6. Collapsed west wall of Outbuilding #1.

Figure 7. The east half of the roof of Outbuilding #1 beginning to collapse.

Figure 8. Overall view of Outbuilding #2 from the southwest corner.

Figure 9. Wood roof trusses of Outbuilding #2 deflecting and showing signs of deterioration.

Figure 10. Collapsed north half of the east wall of Outbuilding #2.

Figure 11. Wires entering on the north side of Outbuilding #2.

Figure 12. Overall view of Outbuilding #3 from the southwest corner.

Figure 13. Collapsed portion of Outbuilding #3.

Figure 14. Overall view of the Hen House from the southeast corner.

Figure 15. Structural members of the Hen House from the east side.

Figure 16. Structural members of the Hen House from the west side.

Figure 17. The south wall of the Hen House exhibiting a noticeable lean.

Figure 18. The north wall of the Hen House beginning to bow inwards.

Figure 19. Multiple partial collapses of the Hen House roof.

Figure 20. Overall view of the main entry of the Cellar from the east.

Figure 21. Broken concrete walls of the main entry of the Cellar.

Figure 22. A cave in of the Cellar on the west side.

Figure 23. Dimensional lumber beams and columns (red arrows) and a concrete wall (yellow arrow) in the Cellar.

END OF REPORT

EXHIBIT F.2: STRUCTURALLY SOUND DETERMINATION LETTER

Wiss, Janney, Elstner Associates, Inc.
14123 Denver West Parkway, Suite 200
Golden, Colorado 80401
303.914.4300 tel
www.wje.com

November 25, 2024

Mr. Patrick Hinterberger
Contracts Supervisor
City of Thornton
9500 Civic Center Parkway
Thornton, Colorado 80602

Aylor Open Space
Existing Structures Assessment – Safe for Entry for Abatement Purposes
WJE No. 2024.4958

Dear Mr. Hinterberger:

At your request, and in accordance with our August 29, 2024 proposal, Wiss, Janney, Elstner Associates, Inc. (WJE) has completed a limited structural assessment of the existing structures located on the Aylor Open Space. This letter summarizes our observations of the structures that we have determined to be *safe to enter for abatement purposes*.

BACKGROUND

The City of Thornton (the City) owns the property that is proposed to become the Aylor Open Space, which is located west of Quebec Street and north of East 136th Avenue. Currently, the property features thirteen structures that were formerly part of a working farm prior to the property being deeded to the City. The thirteen structures include twelve above-grade and one underground. The ages of the structures are unknown.

As we understand, the City is planning to demolish the twelve above-grade structures, which have been determined to contain various levels of asbestos, requiring proper abatement before demolition. Given the readily observable varying degrees of distress in the structures, the City requested a structural assessment of each to determine if they are safe to enter to complete the abatement work. Additionally, the City requested a structural assessment of an underground cellar to determine the feasibility of salvaging it for future use.

Each structure was assigned a corresponding name and number for reference in our proposal, dated August 29, 2024. This letter, as well as all subsequent communication, will continue to apply the same name and number references. A map of all structures assessed is provided in Figure 1.

ASSESSMENT

WJE visited the site on October 24, 2024 to complete a general observation and assessment of each structure. The determination of either *safe* or *unsafe for entry* was based solely on the condition of readily visible framing and structural members. Our assessment considered only whether the structure was *safe* or *unsafe to enter* for routine abatement purposes and should not be construed as an opinion regarding habitability, occupancy, or other long-term use. WJE reserves the right to modify or amend our opinions

in the case of future loading events such as high winds or heavy snows or if the planned abatement procedures have not proceeded within 12 months of the issuance of this letter.

Of the thirteen structures assessed, seven were deemed to be *safe for entry* for asbestos abatement purposes. A list of these structures and relevant observations is provided below.

1 Original Farmhouse

The Original Farmhouse is the northernmost structure on the property and is split into two approximately equally sized halves (Figure 2). The east half appears to have been constructed prior to the west half and, when combined, the entire structure measures approximately 30-feet north-south by 50-feet east-west.

Interior finishes were largely missing and/or damaged, leaving many structural members readily visible. Both halves of the structure were constructed of typical wood-framed walls as well as wood roof trusses with metal truss plates for member connections (Figure 3 and Figure 4). Plywood sheathing covering the roof appeared to be generally intact with few visible holes. No walls appeared appreciably out of plumb. The structural members that were visible from the interior of the structure appeared to be in satisfactory condition suggesting that the Original Farmhouse is safe for entry for abatement purposes.

Below the west half of the structure was an underground basement (Figure 5). One of the basement walls had a wide crack (Figure 6), possibly due to soil movement. The underground basement is also deemed safe to enter for abatement purposes.

Wires appearing to be either electrical power or telephone service enter the structure near the main entry on the south side (Figure 7). WJE cannot comment on the safety of these components and recommends that other professionals be contacted for recommendations on safely working around these wires during the abatement process.

2 Well House

The Well House is located immediately southeast of the Original Farmhouse and measures approximately 10-feet by 10-feet in plan (Figure 8). Interior finishes were largely missing, leaving the structural members readily visible. The structure was constructed of typical wood stud-framed walls as well as dimensional lumber roof rafters (Figure 9). Board sheathing is used to cover the walls while oriented strand board (OSB) sheathing is used for the roof.

The structural members that were visible appeared to be in satisfactory condition, and no walls appeared appreciably out of plumb. The structure is deemed safe for entry for abatement purposes. The roof deck had been penetrated several times by what appeared to be collapsed portions of electrical power or telephone service poles and wires remained attached (Figure 10). WJE cannot comment on the safety of these components and recommends that other professionals be contacted for recommendations on safely working around these wires during the abatement process.

3 Garage

The Garage is located south of the Original Farmhouse and measures approximately 30-feet by 30-feet in plan (Figure 11). It is split approximately equally in half into enclosed and partially enclosed areas. The structure is constructed of typical wood stud-framed walls with dimensional lumber roof rafters and sheathed using OSB panels. The interior finishes in the enclosed area were generally intact, preventing views of the structural members (Figure 12), although no walls appeared appreciably out of plumb.

In the partially enclosed area, interior finishes were not present, leaving the structural members readily visible (Figure 13). The northernmost wall of the partially enclosed area exhibited a slight lean towards the south (Figure 14), however the remaining structure appeared to be standing plumb. The structural members that were visible from the interior appeared to be in satisfactory condition, and the overall structure is deemed safe for entry for abatement purposes. Wires appearing to be either electrical power or telephone service enter the structure near the southeast corner (Figure 15). WJE cannot comment on the safety of these components and recommends that other professionals be contacted for recommendations on safely working around these wires during the abatement process.

6 Silo

The Silo is located to the southwest, adjacent to and north of the dirt road (Figure 16). It measures approximately 10-feet in diameter and is constructed of structurally supported corrugated steel panels. A metal standing seam roof sits on top of the Silo, with one panel displaced (Figure 17). The silo is deemed safe for entry for abatement purposes, although WJE recommends the single displaced roof panel be removed prior to proceeding with abatement.

7 CMU Wall Enclosure

The CMU Wall Enclosure is located east of the Silo across the property's dirt road (Figure 18). It is constructed of concrete masonry units (presumed unreinforced) on three sides, with the fourth side (located on the south edge) remaining open. Two wooden members connected by a metal splice plate and supported by three steel tube columns ran along the south side (Figure 19). No roof was present. The CMU walls exhibited some minor stairstep cracking, although there was no noticeable lean or deflection. This structure is deemed safe for entry for abatement purposes.

9 Camper

The Camper is located south of the Silo across the property's dirt road (Figure 20). It measures approximately 15-feet by 10-feet in plan and is constructed of wood framing with board floors and metal roof panels and cladding. Interior finishes were partially missing, leaving the structure partially visible (Figure 21). The structural members that were visible appeared to be in satisfactory condition, and the structure is deemed safe for entry for abatement purposes.

11 Trailer

The Trailer is located east of the Camper and measures approximately 10-feet by 10-feet in plan (Figure 22). It is constructed of metal framing clad in plywood sheathing with wooden boards as flooring. Interior finishes were not present, leaving the structure readily visible. The structural members that were visible appeared to be in satisfactory condition, and no walls appeared appreciably leaning or out of plumb. This structure is deemed safe for entry for abatement purposes.

CLOSING

We appreciate the opportunity to be of service to the City of Thornton and we are available to discuss this letter with you in more detail should you have any questions.

Sincerely,

WISS, JANNEY, ELSTNER ASSOCIATES, INC.

Andrew P. Stam, PE
Senior Associate

FIGURES

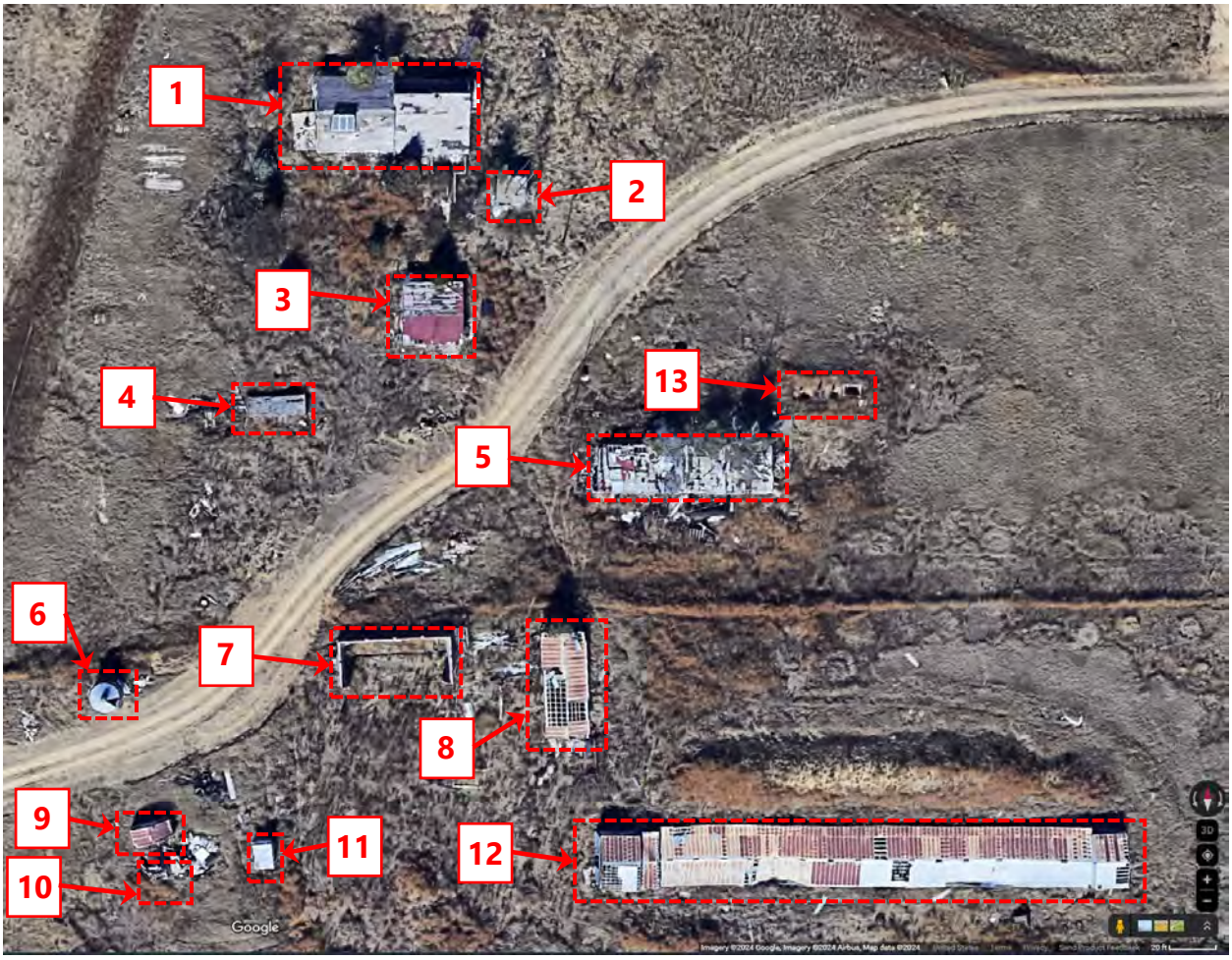


Figure 1. Twelve structures (#1-12) and an underground cellar (#13) on the Aylor Open Space. © Google.
The structures referenced in this letter are 1, 2, 3, 6, 7, 9, and 11.

Figure 2. Overall view of the Original Farmhouse from the southwest corner. The red arrow indicates approximately where the two halves meet.

Figure 3. Wood roof trusses in the west half of the Original Farmhouse.

Figure 4. Wood roof trusses in the east half of the Original Farmhouse.

Figure 5. Underground basement below the west half of the Original Farmhouse.

Figure 6. Large crack in the wall of the underground basement at the Original Farmhouse.

Figure 7. Wires entering the Original Farmhouse on the south side near the main entry.

Figure 8. Overall view of the Well House from the southeast corner.

Figure 9. Interior view of the structural members of the Well House.

Figure 10. Penetrations through roof structure of the Well House .

Figure 11. Overall view of the Garage from the southeast corner.

Figure 12. Structural members partially covered by interior finishes in the enclosed area of the Garage.

Figure 13. Structural members of the partially enclosed area of the Garage.

Figure 14. The northernmost wall of the Garage exhibiting a slight lean towards the south.

Figure 15. Wires entering the Garage in the southeast corner.

Figure 16. Overall view of the Silo from the southeast corner.

Figure 17. Displaced metal roof panel sitting atop the Silo.

Figure 18. Overall view of the CMU Wall Enclosure from the southeast corner.

Figure 19. Wooden members spanning across internment steel tube columns on the south side of the CMU Wall Enclosure.

Figure 20. Overall view of the Camper from the southwest corner.

Figure 21. Structural members partially visible on the interior of the Camper.

Figure 22. Overall view of the Trailer from the south.

END OF REPORT

EXHIBIT G: ASBESTOS CONTAINING MATERIAL & SPILL AREA LOCATIONS DIAGRAM

APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026

NORTH

TITLE: Aylor Parks & Open Space - Major Spill Exterior Locations

DATE: 10/28/25

DS JOB: 28898

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

No Exterior Spill

No Exterior Spill

98'

13'

15'

7'

49'

13'

No Exterior Spill

36'

11'

63'

10'

3'

3'

3'

3'

11'

7'

4'

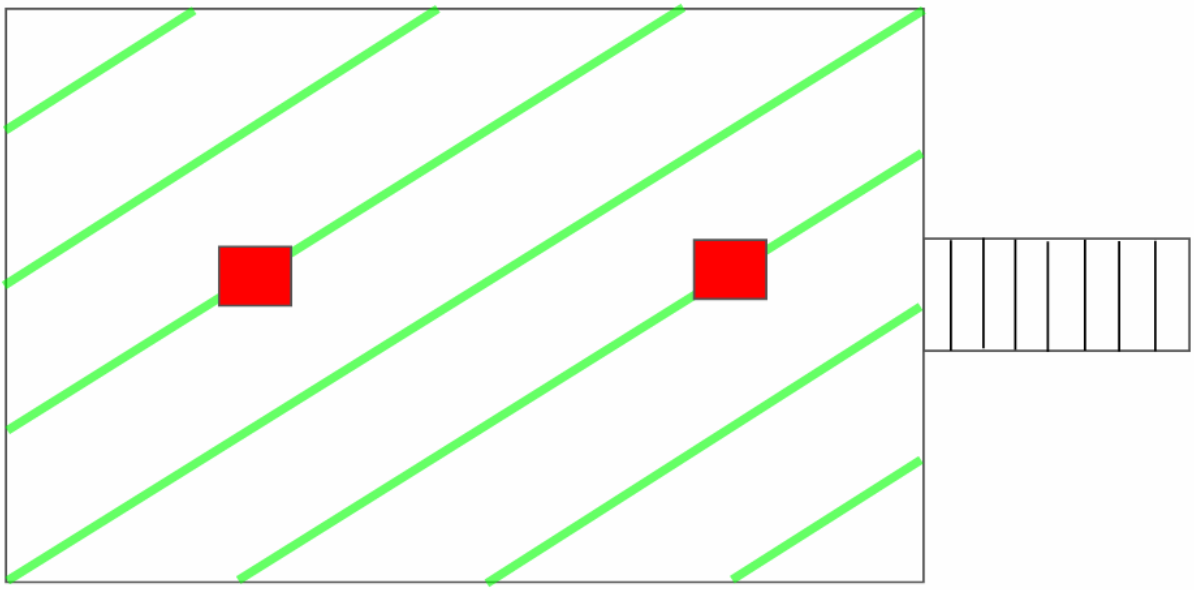
57'

16'

244'

APPROVED

By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026



Key:

Black Fibrous Tar/Paper (4-RT1)

Black Fibrous Tar/Paper (4-RT1)
(Residual Material/Debris)

N.T.S.

APPROVED
By Jeffrey Wolfe at 6:27 pm, Jan 19, 2026

NORTH

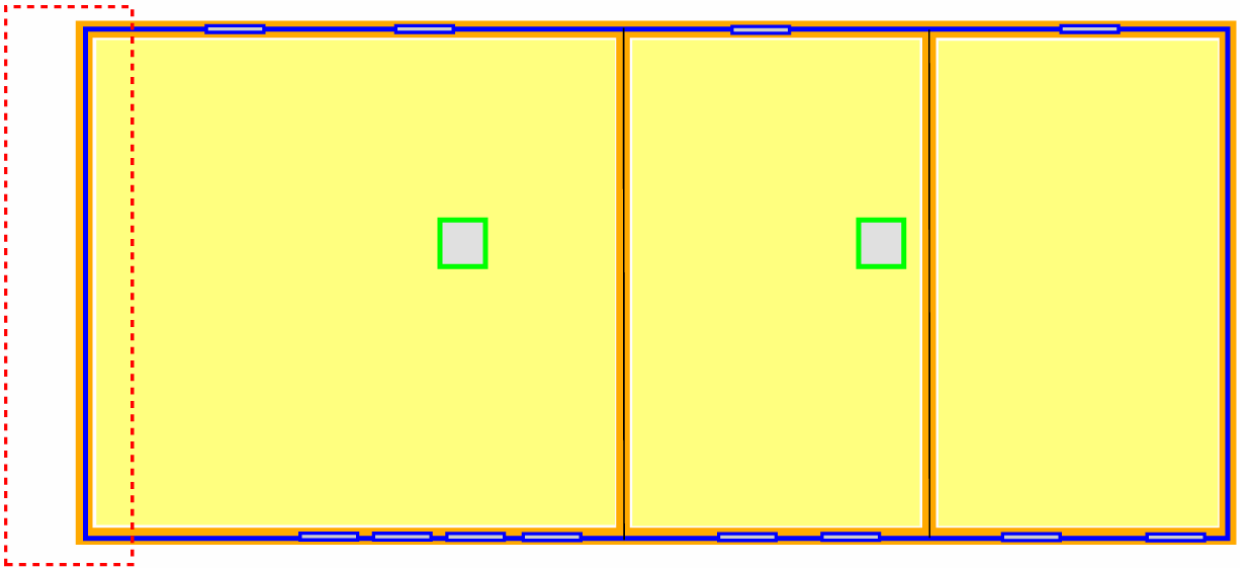
TITLE: Aylor Parks & Open Space - Structure 4 - Sub-Grade Storage Cellar - Major Spill Interior Locations

DATE: 9/9/25

DS JOB: 27123

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

- Roof Flashing Tar (5-RT1)
- Interior/Exterior Tar Patch Material (5-CMUP1)
- Interior/Exterior Tar Sealant (5-CMUP2)
- Collapsed CMU Wall Debris with Tar (TAR1 & TAR2)
- Interior ACM Debris

N.T.S.

APPROVED
By Jeffrey Wolfe at 6:28 pm, Jan 19, 2026

NORTH

TITLE: Aylor Parks & Open Space - Structure 5 - Chicken Coop Barn - Major Spill Interior Locations

DATE: 9/9/25

DS JOB: 27123

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

Key:

ACM Roof Tar Paper (6-RP1) & (6-RM1) and Interior Debris & Associated Soil

N.T.S.

APPROVED

By Jeffrey Wolfe at 6:28 pm, Jan 19, 2026

NORTH

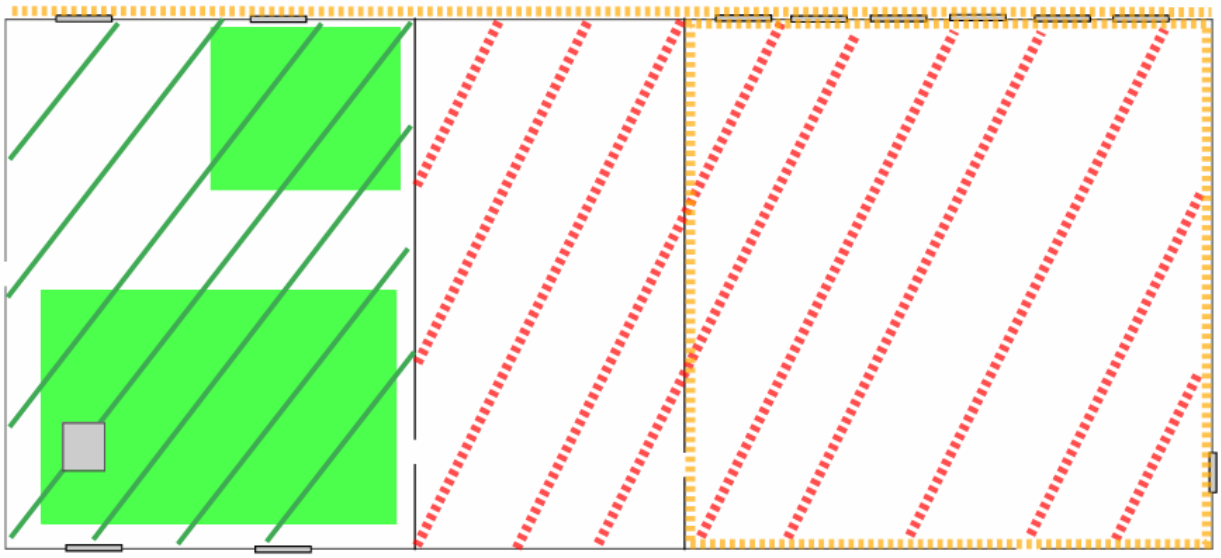
TITLE: Aylor Parks & Open Space - Structure 6 - Poultry Barn - Major Spill Interior Locations

DATE: 9/9/25

DS JOB: 27123

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING



Key:

- Grey Window Glazing on Sashes (7-WG2)
- CMU Wall Patch Tar (7-CMUP2)
- Window Glazing Debris (7-WG2)
- Tar Debris (7-CMUP2)

N.T.S.

APPROVED
By Jeffrey Wolfe at 6:28 pm, Jan 19, 2026

NORTH

TITLE: Aylor Parks & Open Space - Structure 7 - Livestock Barn - Major Spill Interior Locations

DATE: 9/9/25

DS JOB: 27123

LOCATION: 13981 Quebec St, Thornton, Colorado

DS Environmental CONSULTING

EXHIBIT H: ASBESTOS INSPECTION REPORT

Inspection Report performed by DS Environmental, updated October 28, 2025

APPROVED
By Jeffrey Wolfe at 6:28 pm, Jan 19, 2026

ATTACHMENT E INSURANCE REQUIREMENTS

EXHIBIT E

INSURANCE REQUIREMENTS AND CERTIFICATE

A. The Contractor agrees to procure and maintain in force during the term of this Contract, at its own cost, the following coverages:

1. Workers' Compensation Insurance. Workers' Compensation Insurance as required by the Labor Code of the State of Colorado and Employer's Liability Insurance. Evidence of qualified self-insured status may be substituted.

2. Commercial General Liability Insurance **(MINIMUM LIMITS)**

a.	Each Occurrence	$2,000,000.00
b.	Products/Completed Operations Aggregate	$2,000,000.00
c.	Personal and Advertising Injury	$2,000,000.00
d.	General Aggregate	$5,000,000.00

The policy shall include coverage protecting against bodily injury, property damage, and personal injury claims arising from the exposures of (1) premises-operations; (2) products and completed operations including materials designed, furnished and/or modified in any way by Contractor; (3) independent subcontractors; (4) contractual liability risk covering the indemnity obligations set forth in this Contract; and (5) where applicable, liability resulting from explosion, collapse, or underground exposures.

If the above insurance is written on a claims-made form, it shall continue for three (3) years following termination or completion of the Contract. The insurance shall provide for a retroactive date of placement prior to or coinciding with the effective date of the Contract.

3. Automobile Liability Insurance. Automobile Liability Insurance with minimum combined single limits for bodily injury and property damage of not less than one million dollars ($1,000,000) for any one (1) occurrence. This insurance will insure against bodily injury and/or property damage arising out of the Contractor's operation, maintenance, use, loading or unloading of any auto including owned, non-owned, hired and employee autos.

4. Builder's Risk Insurance Policy with minimum limits of not less than the insurable value of the Work to be performed under this Contract at completion, less the value of the Materials and Equipment insured under Installation Floater Insurance. The value shall include the aggregate value of any Thornton-furnished Materials and Equipment to be erected or installed

by the Contractor not otherwise insured under Installation Floater Insurance. The value of Thornton-furnished Materials and Equipment is estimated to be two hundred and fifty thousand dollars ($250,000).

The policy shall protect the Contractor, Subcontractors, ERO, and Thornton from all insurable risks of physical loss or damage to Materials and Equipment not otherwise covered under Installation Floater Insurance, while in warehouses or storage areas, during installation, and during testing. Builder's Risk shall remain in effect until Initial Acceptance of the Project by ERO and Thornton. The policy shall be of the "all risks" type, with coverages designed for the circumstances, which may occur in the particular Work to be performed under this Contract. The policy shall provide for losses to be payable to the Contractor, ERO, and Thornton as their interests may appear. The policy shall contain a provision that in the event of payment for any loss under the coverage provided, the insurance company shall have no rights of recovery against the Contractor, ERO, or Thornton.

Material and Equipment such as pumps, engine-generators, compressors, motors, switch-gear, transformers, panelboards, control equipment, and other similar equipment shall be insured under Installation Floater Insurance when the aggregate value of the Material and Equipment exceeds ten thousand dollars ($10,000). The policy shall provide for losses to be payable to the Contractor, ERO, and Thornton as their interests may appear. The policy shall contain a provision that in the event of payment for any loss under the coverage provided, the insurance company shall have no rights of recovery against the Contractor, ERO, or Thornton.

5. Installation Floater Insurance Policy. The policy shall have and maintain minimum limits of not less than the insurable value of the Work to be performed under this Contract at completion, less the value of the Materials and Equipment insured under Builder's Risk Insurance. The value shall include the aggregate value of any Thornton-furnished Materials and Equipment to be erected or installed by the Contractor not otherwise insured under Builder's Risk Insurance.

The policy shall protect the Contractor, Subcontractor, ERO, and Thornton from all insurable risks of physical loss or damage to Materials and Equipment not otherwise covered under Builder's Risk Insurance, while in warehouses or storage areas, during installation, during testing, and after the Work under this Contract is completed. The policy shall be of the "all risks" type, with coverages designed for the circumstances, which may occur in the particular Work to be performed under this Contract. The policy shall provide for losses to be payable to the Contractor, ERO, and Thornton as their interests may appear. The policy shall contain a provision that in the event of payment for any loss under the coverage provided, the insurance company shall have no rights of recovery against the Contractor, ERO, or Thornton.

6. Products and Completed Operations Liability Insurance. The Contractor shall provide Products and Completed Operations Liability Insurance and name ERO and Thornton as an additional insured for a minimum of one (1) year after the date of Final Acceptance. The Contractor shall continue to provide evidence of such coverage by submission of a Certificate of Insurance to ERO and Thornton no later than thirty (30) Calendar Days prior to the scheduled expiration of such coverage. Additional Insured endorsements shall indicate applicable Products and Completed Operations coverage.

B. **Additional Insured.** The Contractor shall name ERO and Thornton, its officer, agents, and employees as additional insureds with respect to the Commercial General Liability, Auto Liability, Builder's Risk and Installation Floater coverages above. Contractor shall require any Subcontractor to name ERO and Thornton, its officers, agents, and employees as additional insured with respect to Commercial General Liability and Auto Liability coverages.

C. **Certificates of Insurance.**

1. A Certificate of Insurance shall be completed and forwarded, along with the Additional Insured Endorsements, to ERO and Thornton by the Contractor's Insurance Agent(s) as evidence that policies providing the required coverages, conditions, and minimum limits are in full force and effect and shall be subject to review and approval by ERO and Thornton **prior to commencement of any Work under this Contract.** The Contractor shall provide (or cause to be provided) copies of Certificates of Insurance from all subcontractors indicating the City's Additional Insured statuses on their General Liability and Auto Liability policies. The initial completed Certificate(s) of Insurance and Additional Insured Endorsement(s) shall include the Contractor's e-mail address for future inquiries and updates, and shall be sent to:

ERO Resources Corporation
Jack Denman, Project Manager
1626 Cole Boulevard, Suite 100
Lakewood, Colorado 80401

City of Thornton
Andrew Villarreal, Contract Administrator
9500 Civic Center Drive
Thornton, CO 80229-4326

2. Subsequent Certificates of Insurance indicating renewal of coverage(s) shall be sent to the ERO contact and Thornton's Risk Manager at certificatesofinsurance@ThorntonCO.gov no later than thirty (30) Calendar Days prior to the expiration date. Indicate "Renewal COI" and the Project Number in the e-mail subject line.

3. ERO and Thornton reserve the right to request and receive a certified copy of any policy and any endorsement thereto. Contractor agrees to execute any and all documents necessary to allow ERO and/or Thornton access to any and all insurance policies and endorsements pertaining to the Work

D. **Subcontractor Insurance Coverages.**

1. Contractor shall cause any Subcontractor to procure and maintain adequate levels of insurance coverage for Workers' Compensation, Commercial General Liability, Automobile Liability, and other coverages Contractor may require. Contractor shall require Professional Liability insurance for any Subcontractor performing delegated design services with minimum limits of $1,000,000 per claim and $2,000,000 aggregate, and if coverage is written on claims-made coverage form, it shall continue for three (3) years following termination of this agreement.

2. For Commercial General Liability and Automobile Liability insurance of any subcontractor, ERO and Thornton will be named as an additional insured. Contractor shall prepare a schedule of required coverages for each of its Subcontractors and shall submit such schedule to ERO and Thornton prior to any Subcontractor commencing any Work under the Contract. Such coverages for any Subcontractors shall be procured and maintained with forms and insurers acceptable to ERO and Thornton. All coverages shall be continuously maintained to cover all liability, claims, demands, and other obligations assumed by the Contractor.

3. Contractor shall require any Subcontractor to name ERO and Thornton, its officers, agents, and employees as additional insured with respect to Commercial General Liability and Auto Liability coverages.

E. **Other Insurance Requirements**.

1. Minimum Insurance Coverages. Contractor shall procure and maintain the minimum insurance coverages listed herein. Such coverages shall be procured and maintained with forms and insurers acceptable to ERO and Thornton. All coverages shall be continuously maintained to cover all liability, claims, demands, and other obligations assumed by the Contractor. If the above insurance is written on a claims-made form, it shall continue for three (3) years following termination or completion of the Contract. The insurance shall provide for a retroactive date of placement prior to or coinciding with the effective date of the Contract.

2. Supplemental Insurance Coverage. Other insurance, with varying limits, which from time to time, may reasonably be required by the mutual agreement of ERO, Thornton, and Contractor against other insurable hazards relating to the Work to be done, shall be provided.

3. Primary Insurance Coverage. Every policy required above shall be primary insurance, and any insurance carried by ERO or Thornton, its agents, officers, or employees shall be excess and not contributory insurance to that provided by the Contractor. The Contractor shall be solely responsible for

any deductible losses under the required policies and such deductible losses shall not be billed to ERO or Thornton.

4. The Contractor shall not be relieved of any liability, claims, demands or other obligations assumed pursuant to the Contract by reason of its failure to procure and maintain insurance, or by reason of its failure to procure or maintain insurance in sufficient amounts, durations or types.

5. All policies shall include a provision that the coverages afforded under the policies shall not be canceled, terminated, or materially changed prior to the natural termination date until at least thirty (30) Calendar Days prior written notice has been sent to ERO and Thornton. The Certificate(s) shall indicate the form used, if any, under which this provision is included.

F. **Failure to Insure.** Failure on the part of the Contractor or a Subcontractor to procure or maintain policies providing the required coverages, terms, conditions, and minimum limits shall constitute a material breach of Contract upon which ERO may immediately terminate the Contract. At its discretion, ERO may procure or renew any such policy or any extended reporting period and may pay any and all premiums in connection therewith, and all monies paid by ERO shall be repaid by Contractor to ERO upon demand, or ERO may offset the cost of the premiums against any monies due or to become due to Contractor from ERO. In addition to the foregoing, in the event any coverage required by the Contact expires or is cancelled during the term of the Contract, the Contractor shall be required, without further notice from ERO, to suspend the Work at 12:00 a.m. on the date of insurance expiration or cancellation, and may not resume Work until the required insurance coverage is obtained and evidence of such coverage is submitted to and approved in writing by ERO and Thornton. The Contractor shall not be entitled to any compensation therefor, including compensation for delay. The Contract Time shall continue to run during such suspension period and the Contractor shall remain fully responsible for any Liquidated Damages that are assessed as a result of late performance. During such suspension of Work the Contractor remains responsible for all safety and protection of persons and property under the Contact.

G. **Governmental Immunity**. The Parties understand and agree that Thornton, its agents (ERO), officers, and employees, are relying on, and do not waive or intend to waive by any provision of this Contract, the monetary limitations or any other rights, immunities, and protections provided by the Colorado Governmental Immunity Act, C.R.S. 24-10-101 et seq., as may be amended, or otherwise available to Thornton, its agents, officers, or employees.

CERTIFICATES OF INSURANCE

ATTACHMENT F SAMPLE ERO CONTRACT

SERVICES AGREEMENT

AGREEMENT is made this XX day of XXX, 2025 by and between ERO Resources Corporation, a Colorado corporation, hereinafter referred to as "ERO" and [Contractor]. ("NAME") hereinafter referred to as "Contractor," for services described in Section 1 of this Agreement.

ERO, under ERO's the Professional Consulting Service Agreement for On-Call Environmental Services Prime Agreement No. 237-18A ("Prime Agreement") with the City of Thornton ("Client"), has entered into a Contract with Contractor for furnishing services in connection with the Aylor Property Abatement, Demolition, and Removal - City of Thornton Project **XX-XXX**, in Thornton, Colorado, hereinafter referred to as "Project." Contractor shall supply technical and professional services in connection with and in support of the Project under ERO's Prime Agreement with Client.

ERO and Contractor, for and in consideration of the mutual covenants and promises contained herein, hereby agree as follows:

1. *Incorporation of Prime Agreement.* Contractor assumes toward ERO all of the obligations and responsibilities that ERO assumes toward Client in the Prime Agreement as they relate to the Subcontracted Services. The applicable portions of the Prime Agreement are incorporated herein by reference and have been made available to Contractor. In the event of a conflict between the Prime Agreement and this Subcontract, the Prime Agreement controls unless this Subcontract adds additional requirements or remedies.

2. *Work to be Performed*. Contractor shall supply all services, labor, materials, supplies and equipment necessary to perform the work described in Exhibit A, "Scope of Work," attached hereto and incorporated herein by reference (hereinafter referred to as the "Work").

3. *Contractor's Services*. Contractor's services shall be performed, any findings obtained and recommendations prepared in accordance with generally and currently accepted standards, practices, and regulations in the industry and profession. Deliverables associated with the Contractor's services are described in Exhibit A.

4. *Key Personnel.* Contractor's personnel assigned to the Work to be performed hereunder shall be fully competent and trained in the disciplines to which their work relates, and Contractor agrees to replace any individual reasonably deemed by ERO to be unsuitable for the job.

5. *Commencement and Completion*. Contractor agrees to commence the work to be performed hereunder upon receipt of appropriate written notice to proceed, and Contractor shall diligently perform and complete the Work within the time period described in Exhibit A. It is expressly agreed that time is of the essence in this Agreement. If Contractor commences any portion of work prior to receiving such written notice to proceed, Contractor proceeds with such work at its own risk and without the right to claim compensation for such work. No on-site work shall proceed without notice.

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6. *Acceptance of Work Conditions*. By executing this Agreement, Contractor represents that he has, by examination or otherwise, satisfied himself as to the visible nature and extent of conditions to be encountered and the qualifications and number of personnel needed to perform and successfully complete the Work hereunder.

7. *Rejection.* ERO and Client reserve the right to review any work product produced by Contractor and to reject such work product or any portion thereof that, in the reasonable opinion of ERO or Client, shows that the services were not completed in accordance with this Agreement. ERO's failure to timely notify Contractor of a rejection of the work product or its services or to specify with particularity any defect therein after rejection thereof, shall not bar ERO from any remedies for breach that it may otherwise have.

   When Contractor considers the Work to be complete, ERO and/or Client shall conduct inspections to verify and prepare a list of remaining items to be completed or corrected. Should those items be listed as deliverables in the Work Scope, additional compensation shall not be requested. When ERO, on the basis of inspection by ERO and/or Client, determines that the Work is complete, with regard to both the items to be completed or corrected, ERO will approve and pay the Final Invoice in accordance with terms set forth in this Agreement.

8. *Communications*. Contractor shall coordinate project-related communications with ERO. All communications with Client regarding administrative or managerial matters, such as deadlines, budgets, policy interpretation, shall be directed to and handled by ERO. Contractor will not perform work directed solely by Client that is beyond the scope of this Agreement.

9. *Ownership of Plans and Documents*. Field notes, design notes and original tracings of plans and specifications, and all other data and reports developed by the Contractor shall become the property of and delivered to ERO at the completion of the project. Contractor shall be permitted, however, to retain copies of all such documents or data for his records.

10. *Contractor's Compensation*. In consideration of the work performed by Contractor as herein described, ERO shall pay Contractor on a unit-rate basis, based on the schedule of rates included in Exhibit B, not to exceed the base bid of ***[AWARD AMOUNT- BASE BID] ($X.XX)*** ***without prior authorization by ERO. Prices for add-alternates are included and described in Exhibit B.*** Records of Contractor's unit rates, based on those costs in attached Exhibit B, hours worked, compensation due, and reimbursable expenses pertaining to the Contractor's Work shall be kept on a generally recognized accounting basis and be provided to ERO with monthly invoicing.

    Modifications to the compensation will be determined on a case-by-case basis with compensation based on unit rates listed in Exhibit B. Should additional tasks outside of the Work Scope be identified with no established unit rates, ERO will request a Contract Change Order Estimate from the Contractor. The Change Order Estimate must be approved prior to any work performed under the Change Order.

11. *Manner of Payment.* Contractor shall submit monthly invoices for services rendered. Invoices will denote unit quantities, as calculated from Exhibit B, Cost

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Schedule, to be used as the Table of Values. Invoices received by ERO on or before the last day of the month shall be incorporated into ERO's invoice to Client. **Contractor shall receive payment within five business days of ERO's receipt of payment from Client of any invoice in which Contractor's costs were included.** All invoices shall be sent to the address given in Section 21 of this Agreement. Failure to comply with all provisions of this section shall result in return of Contractor's invoice for revision.

An Affidavit of Partial Payment, Lien Waiver and Indemnification will be required to be submitted prior to all payments made on Contractor invoices (Exhibit C).

12. *Retainage.* All invoices are to include a retainage by the Contractor of 5%, the balance of which can be invoiced no sooner than 60 days after substantial completion and acceptance by the Client.

13. *Compliance with Laws*. Contractor shall comply with all applicable laws, rules and regulations, including without limitation the Equal Employment Opportunity provisions contained in 41 CFR 60-1.4(a). Contractor shall, at its own expense, secure all necessary approvals, permits, licenses and consents necessary in the performance of the work hereunder. If ERO advises that it is party to a specific agreement to give preference to a certain category of workers, Contractor shall honor such preference to the extent possible in assigning qualified personnel in its employ to the project.

14. *Taxes*. Contractor agrees to pay when due, and to indemnify ERO against all claims, expense and liability in connection with, all income, franchise, sales, social security, personal property, use, unemployment and other taxes assessed by any federal, state, county, municipal or any other authority by reason of the performance of the Work or the acquisition, ownership, furnishing or use of any materials, equipment, supplies, labor, services or other items for or in connection with the Work. This section shall apply in full to any Contractors hired directly by or teamed with the Contractor.

15. *Claims and Liens*. To the extent Contractor receives proper payment from ERO as required herein, Contractor shall keep ERO's and Client's property free and clear of all claims of lien, stop notices or attachments that may be asserted in connection with the Work, and Contractor agrees that it shall promptly discharge all Contractor's obligations for taxes, wages, equipment, supplies and material. This section or one that is similar in intention shall be inserted in all agreements of Contractor's subcontractors.

1. *Insurance – Contractor*. Contractor shall indemnify, defend and hold harmless ERO and Client, their subcontractors, consultants, agents, officers, directors and employees from and against all claims, damages, losses, expenses, and liabilities of whatever kind or nature, whether direct, or indirect or consequential, including but not limited to reasonable fees and charges of attorneys and court and arbitration costs, to the extent arising from Contractor's errors, negligent acts or omissions or those of its employees, agents or subcontractors. Contractor agrees to maintain in force throughout the term of this Agreement Worker's Compensation and Employer's Liability Insurance. No work under this contract shall be compensated until certificates of insurance conforming with the minimum requirements described

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below are obtained and submitted to ERO. ERO and Thornton shall be included as an additional insured to the extent of the risks and liabilities expressly assumed herein. Insurance companies must be satisfactory to ERO.

Insurance – Sub-Contractors. Contractor shall ensure, and will confirm in writing and provide documentation if requested by ERO, that its sub-contractors maintain adequate insurance to cover the risks associated with each sub-contractor's performance of the Work. Contractor shall indemnify and hold harmless ERO for any and all claims arising from or relating to the adequacy of Contractor' s sub-contractors' performance or insurance.

Minimum Insurance Requirements:

Commercial General Liability	$2,000,000 per occurrence/$5,000,000 general aggregate including: Completed operations for $2,000,000/$2,000,000 $2,000,000 personal and advertising injury
Umbrella/General Aggregate	$5,000,000 per occurrence/aggregate
Professional Liability	$2,000,000 per claim/$2,000,000 aggregate
Automobile Liability including coverage for all owned, non-owned, hired and vehicles.	$1,000,000 combined single limit Form at least as broad as ISO for CA 0002 (12 /93) Symbol 1 CA 9948 Broadened Pollution Endorsement must be added.
Workers Compensation	Statutory Limits
Sub-Contractor's Environmental Liability	$1,000,000 per occurrence/$2,000,000 Aggregate Completed Operations $1,000,000 per occurrence/$2,000,000 aggregate (minimum two years) No exclusion for aquifers No exclusion for natural resource damage Coverage to include: hazardous substances as defined by Federal, State or local statutes and regulations and include any solid, liquid, gaseous or thermal irritant or contaminant, including smoke, vapor, soot, fumes, acids, chemicals, alkalis and waste material

All required policies and the certificates evidencing same shall contain the following endorsement:

> *"No cancellation or non-renewal of this policy or change hereto by endorsement or otherwise shall be effective until the thirtieth (30th) day following the mailing of written notice of such cancellation or endorsement to ERO Resources Corporation"*

All policies must be endorsed to be primary with all policies of ERO being excess and non contributory.

All policies will be endorsed to provide a waiver of subrogation in favor of ERO and Client.

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16. *Contractor not Agent of ERO or Client.* In the performance of the work hereunder, Contractor is acting in the capacity of an independent contractor and not as an agent of ERO or Client. Contractor agrees not to hold itself out as an agent of ERO or Client and further agrees to indemnify and save ERO and Client harmless from any and all claims of whatever kind or nature arising out of any act or representation of Contractor contrary to terms of this article.

17. *Bonding.* Contractor shall submit proof of Materials and Payment (M&P) and Performance bonding for the full contract amount ($XXXXX) prior to the Notice to Proceed. ERO and City of Thornton shall be listed as Obligee on bonding materials.

18. *Full Power and Authority.* Each of ERO and Contractor represent and warrant to the other that they have the full power and authority to execute and deliver this Agreement, and perform their respective obligations hereunder.

19. *Assignment.* Contractor shall not assign this Agreement in whole or in part, nor shall Contractor subcontract any portion of the work to be performed hereunder; provided, however, that Contractor may, subject to ERO's prior written approval, use the services of persons or entities not in Contractor's employ such as Sub-Contractors and independent testing laboratories. This Agreement is independent of any teaming or sub-contracting agreements Contractor may hold.

20. *Events of Default.* An event of default ("Event of Default") shall occur if either party breaches any term, condition, warranty or covenant this Contract or the Contract Documents; and fails to immediately commence and thereafter within seven (7) days from receipt of the non-breaching party's written notice of such default, satisfactorily correct such default. If either party commits a breach under this Agreement, the non-breaching party may terminate this Agreement by giving the breaching party seven (7) days' written notice.

21. *Termination.* ERO may terminate this Agreement without cause or penalty at any time upon five (5) days written notice to Contractor; provided, however, that ERO shall be obligated to pay Contractor pursuant to the terms hereof for all services performed and obligations incurred by Contractor as of the date of termination. Any termination charges shall not exceed 5% of the Contractor's expenditures to date of termination. In such event, Contractor shall deliver its work product completed through the date of termination to ERO as soon as practicable.

22. *Notices.* Any notice to be given pursuant to Section 20 shall be deemed sufficiently given to a party if delivered via email or personally to an officer of said party or if mailed, postage prepaid, registered or certified, and addressed to:

Jack Denman
ERO Resources Corporation
1626 Cole Blvd., Ste 100
Lakewood, Colorado 80401
jdenman@eroresources.com

CONTRACTOR.

23. *Confidentiality*. Contractor agrees to keep confidential and not to disclose to any person or entity without the prior written consent of ERO all data and information of whatsoever kind generated by Contractor or furnished Contractor by ERO in the

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course of Contractor's performance hereunder; provided, however, that this Section 23 shall not apply to data and information acquired by Contractor, which is in the public domain. Contractor shall use its best efforts to provide services that do not infringe on any valid patent or involve the use of confidential information to which the Contractor has no license or rights. Contractor shall indemnify and hold harmless ERO and Client from any claims or actions arising out of Contractor's alleged patent infringement or use of confidential information.

24. *Term of Agreement*. Subject to the provisions of Section 20, this Agreement shall remain in force from the date hereof until the earlier of a) satisfactory completion of the work described in Exhibit A hereto; or b) August 1, 2024, unless extended by written agreement of the parties. All provisions of the Agreement shall survive the completion of the services under this Agreement and the termination of this Agreement for any cause.

25. *Entire Agreement.* This Agreement includes the terms and provisions set forth in Exhibit A attached hereto and incorporated herein by this reference, and reflects the entire agreement of the parties with respect to the subject matter hereof. No prior proposals, quotations, solicitations, negotiations, communications, understandings, or representations shall be of any effect, and no change, addition or amendment shall be effective unless agreed to in writing by both parties.

26. *Waiver.* Failure to enforce any provision hereof in one instance shall not constitute a waiver of the party's rights thereunder with respect to any future claim.

27. *Situs.* The law of the state of Colorado applies to this Agreement.

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ACCEPTED:

ERO Resources Corporation

_____

«ERO_Sign» *Date*

« Contractor»

_____

Date

Exhibit A
Scope of Work

Tasks

Schedule

Work Products

Exhibit B

Schedule of Values

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Exhibit C

Affidavit of Partial Payment, Lien Waiver and Indemnification

I. Affidavit of Payment

The undersigned, being first duly sworn that he is the authorized agent for _____ (the " Contractor ") on the Project commonly referred to as _____ and located at _____and as legally described herein as the Property, in the County of_____, State of Colorado, on which _____ has served as the _____(Type of Work/Subcontractor).

Upon receipt and bank clearance of the payment referenced in Section II below (the "Partial Payment" or "Final Payment"), the Contractor/Supplier will be fully paid for all labor, materials and all other expenses furnished on the Project as of the date of the invoice giving rise to the Partial Payment. Final Payment shall be noted as Final Completion Payment for tasked work. The undersigned, certifies that all such Contractor/Supplier obligations arising out of the Project as of such date have been fully paid and that the Contractor/Supplier has complied with all Federal, State, and local tax laws, including Social Security, Unemployment Compensation, and Worker's Compensation laws in sofar as applicable to the performance of Contractor's/Supplier's work on the Project.

II. Lien Waiver

Upon receipt and bank clearance of Partial Payment in the amount of $ _____ Contractor/Supplier waives it's rights under the applicable state mechanics lien law, Federal, State, and local law, including C.R.S. § 38-22-101, et seq. and the Miller Act for the Contractor/Supplier to file a mechanics lien, bond or administrative claim on the Project or on the Property for all labor, materials and all other expenses and obligations to Contractor/Supplier provided or arising as prior to such date. The undersigned also releases all of the Contractor's/Supplier's rights to make any such claim, whether known or unknown , against the Project, the Property, its sureties, ERO Resources Corporation, the Owner of the Property, and all intermediate subcontractors and suppliers of any tier.

This lien waiver is voluntarily given and the undersigned acknowledges that he has fully reviewed the terms of this lien waiver, and is full y informed of the legal effects of this lien waiver, and has voluntarily chosen to accept the terms of this agreement in return for the Partial/Final Payment.

III. Indemnification

The Sub -Contractor/Supplier hereby indemnifies and agrees to defend the Project, its sureties, the Property, ERO Resources Corporation, and the Owner of the Property, from any other claims arising by or through the Contractor/Supplier from all claims, liens, liabilities, and losses, including reasonable attorney's fees, asserting or alleging that the Contractor/Supplier has not fully paid for all labor, material, and expenses incurred in connection with it s work on the Project. The undersigned agrees that execution of this lien waiver in no way releases the Contractor/Supplier from its continuing obligations in connection with the Project. Moreover, if the Contactor/Supplier has furnished a bond in connection with the performance of the Work, the surety for the Contractor/Supplier agrees to be bound.

CONTRACTOR/SUPPLIER:

By: _____
[signature of authorized agent]

_____
[printed name & title]

STATE OF _____) ss
COUNTYOF _____)

The foregoing instrument was subscribed and sworn to before me this __ day of_____
by _____ *as* _____ *of*_____

Witness my hand and official seal.

My commission expires: _____

_____
Notary Public

ATTACHMENT G BID FORM

This Bid Form shall be used to itemize the total project bid, inclusive of all labor, permits, materials, and equipment to complete the project as described herein. Alternate pricing and unit pricing is required to be submitted and be incorporated into contract for unexpected findings, but not included within evaluation criteria.

Cost Bid Sheet		
Bid Item		Cost
1.0 Base Bid – Asbestos Abatement		
1.1	Mobilization/Demobilization	$
1.2	Regulation 8 Structure Abatement	$
1.3	Open Air Abatement/Demolition	$
Bid Item A Total (1.1 through 1.3)		
2.0 Base Bid – Demolition		
2.1	Mobilization/Demobilization	$
2.2	Stormwater Management Plan	$
2.3	Demolition Structures	$
2.4	Debris Removal	$
2.5	Restoration/revegetation per 500/square yards, basis of 10,000 square yards	$ /500 yd^2
Bid Item B Total (2.1 through 2.5)		$
Total Bid (Bid Items A+B)		***$***
3.0 Option Bid – Soil Removal		
3.1	Mobe/Demobe	$
3.2	Removal (3,500 CY)	$
Bid Item C Total (3.1 through 3.2)		$

All costs are to be provided on Net 60-day payment terms

Authorized
Signature_____Date_____

Company_____