Former Luther Town Hall

Luther, Oklahoma

Final Remediation Report

SITE CLEANUP ASSISTANCE PROGRAM

The Oklahoma Department of Environmental Quality is pleased to present the Town of Luther with the Final Remediation Report for the former Luther Town Hall.

Targeted Brownfields Assessment

In June 2020, DEQ's Brownfields Program provided the Town of Luther with Asbestos and Lead Based Paint/Lead Dust Inspections. No Lead Based Paint was found. Lead Dust and Asbestos were identified.

Lead Dust Remediation

In February 2021, DEQ and its contractors completed the following activities:

- Lead Dust Remediation, including:
- Cleaning and sealing the floors with acrylic sealant in the upstairs Room #3 shown in the attached project documents.
- Note: the lead dust identified in the Machine Shop was not remediated as part of this project.

Asbestos Remediation

In February 2021, DEQ and its contractors completed the following activities:

- Asbestos abatement, including:
- 1320ft^2 of asbestos containing joint compound and ceiling texture removal
- 24ft^2 of asbestos containing floor tile mastic removal

DEQ OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY

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Deeds and Legal Documents

OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY

Environmental Access Permit

THIS PERMIT made and entered into by and between the Town of Luther, hereinafter called the PERMITOR, and the **Oklahoma Department of Environmental Quality**, hereinafter called the PERMITTEE.

WITNESSETH, PERMITTEE is hereby granted permission and authority to enter upon the following described property, situated the Town of Luther, Oklahoma, hereinafter referred to as the "Property":

119 South Main Street, Luther, OK 73054

Lot Ten in Block Seven, of the Original Townsite to Luther, Oklahoma. This also includes an undivided one half interest in the North wall of said lot.

Attached and incorporated by reference as **Exhibit "A"**, Property Deed and Map.

TERMS AND CONDITIONS OF PERMIT:

1. **TERM**: This Permit shall be for a period of (1) year beginning September 1, 2020, and ending August 31, 2021 and may be renewed annually until cancelled by either party.

2. **USE OF PROPERTY**: PERMITTEE and its consults or contractors may enter upon said property for the purposes of sampling of groundwater, surface water, soil or sediment, taking of photos and videos of sampling locations, collection of GPS and or survey data, performance of remedial activities as outlined in Statement of Work attached hereto as **Exhibit "B"**, install, erect, operate, maintain, remove, and perform all work associated with said testing or remedial activities, including inspections as needed. PERMITTEE and its consults and contractors shall have the right of ingress and egress, to and from said site across adjoining lands of the PERMITOR. PERMITOR shall provide utility services as needed during the occupancy of said premises. PERMITOR and PERMITTEE acknowledge that all equipment and improvements of PERMITTEE to support the said operations shall be deemed personal property of PERMITTEE.

3. **MAINTENANCE**: PERMITTEE agrees that no other changes shall be made to the Property without prior written permission of the PERMITOR, other than what is necessary for the purpose of the Permit.

4. **INDEMNIFICATION**: PERMITOR agrees on its behalf and that of any successors or assigns to hold harmless, defend and indemnify the PERMITTEE, its officers, agents, employees, representatives, successors, and assigns, from and against any and all losses, liabilities, expenses, claims, demands, injuries, damages, fines, penalties, costs or judgments, including, without limitation, attorney's fees and costs of any kind. Without waiving any defense or immunity, and subject to the Oklahoma Governmental Tort Claims Act, such indemnification shall exclude any such liability to the extent caused by the negligence or willful misconduct of the PERMITTEE, its officers, agents, employees, representatives, successors, and assigns while acting within the scope of their employment.

5. **NO WARRANTIES**: The PERMITTEE makes no representations or warranties of any kind in connection with this Permit. This Permit is subject to all existing conditions, restrictions, reservations, easements, servitudes and right of ways of record.

6. **ASSIGNMENT**: This Permit cannot be assigned in whole or in part without the written approval of the PERMITTEE.

7. **TERMINATION**: Either party may terminate this Permit, or any renewals of this Permit, by giving written notice at least sixty (60) days prior to the desired date of cancellation.

8. **APPLICABLE LAW**: This Permit shall supersede any and all previous agreements whether oral or written and shall be governed by the laws of the State of Oklahoma.

9. **NON-WAIVER**: Failure of either the PERMITOR or PERMITTEE to exercise any right given hereunder or to insist upon strict compliance with regard to any term, condition or covenant specified herein, shall not constitute a waiver of the PERMITOR or PERMITTEE'S right to exercise such right or to demand strict compliance with any term, condition or covenant under this Agreement.

10. **ENTIRE AGREEMENT**: This Permit constitutes the sole and entire agreement of the parties and is binding upon the PERMITOR and the PERMITTEE, their heirs successors, legal representatives and assigns.

PERMITOR: Town of Luther
(Type or Print)

By: Scherrie Pidcock
(Signature)

Scherrie Pidcock, Town Manager
(Print Name and Title)

Date: 8-24-2020

PERMITTEE: OKLAHOMA DEQ
(Type or Print)

By: CM Sharp
(Signature)

Catherine Sharp, Director, Admin. Services
(Print Name and Title)

Date: 10-19-2020

This Intergovernmental Agreement (Agreement) between the Oklahoma Department of Environmental Quality (DEQ) and the Town of Luther (City) is for environmental cleanup services provided by DEQ for the Property located at 119 South Main Street, Luther, OK 73054 (Lot Ten in Block Seven, of the Original Townsite to Luther, Oklahoma. This also includes an undivided one half interest in the North wall of said lot). The areas of responsibility and relationships presented herein provide the conceptual framework under which the project will be executed.

I. **STATUTORY AUTHORITY AND EFFECTIVE DATE:** This Agreement is authorized pursuant to and in accordance with the provisions of Title 27A Okla. Stat. (O.S.) § 2-3-201, 27A O.S. § 2-3-202, 74 O.S. § 581, and 74 O.S. § 1008. This Agreement shall begin on September 1, 2020 or when executed by all parties whichever date occurs of the later and will continue through August 31, 2021 or until completion of project or through an amendment whichever occurs first. This Agreement does not automatically renew and can be renewed for a period of four (4) additional years by agreement of the parties.

II. **ENVIRONMENTAL CLEANUP SERVICES:** The City has requested environmental cleanup assistance from DEQ. DEQ agrees to provide the environmental cleanup services outlined in the attached Statement of Work (Exhibit A) and the City agrees to these services.

III. **RESPONSIBILITIES OF ALL PARTIES:** The City and DEQ mutually agree that the responsibilities shall be as stated below:

1) City's Responsibilities: The City shall be responsible for the duties listed below and shall not hold DEQ responsible for any of the duties. Those duties shall include:
   a) Appoint a representative to serve as the central point of contact on matters relating to this Agreement and submit said representatives name and contact information to DEQ within ten (10) days of the effective date of this Agreement;
   b) Restrict occupant's use/presence in the facility during remediation, as requested. This could include but is not limited to removing equipment, vehicles and other items that may be in the way of cleanup activities;
   c) Accept responsibility for damages listed below that are required to perform the environmental cleanup work;
      i. Ceiling drywall and/or drop tiles that must be removed in order to access and remove asbestos containing joint compound and texture will not be replaced. See Exhibit A for exact locations.
   d) Attend routine update calls with DEQ during the remediation process; and
   e) Perform any continued operations and maintenance required to keep remedy protective if needed.
2) DEQ's Responsibilities: DEQ shall be responsible for the duties listed below and shall not hold the City responsible for any of the duties. Those duties shall include:
   a) Appoint a representative to serve as the central point of contact on matters relating to this Agreement and submit said representatives name and contact information to the City within 10 days of the effective date of this Agreement;

b) Provide regular verbal progress reports via calls with the City;
c) Manage work and cover costs associated with the environmental cleanup work outlined in the attached Statement of Work (Exhibit A);
d) Supply the City with a final report of all DEQ activities within 90 days of completion of work;
e) Provide the City with an Operations & Maintenance (O&M) plan if O&M is required.

IV. **ACCESS TO PROPERTY:** All access to property shall be enforced by the executed Environmental Access Permit that shall accompany this Agreement upon execution.

V. **PUBLIC INFORMATION:** The City is generally responsible for all public information. The City shall acknowledge the DEQ cleanup services outlined in this Agreement when making public statements regarding this building. The City will allow DEQ to place signs on the property during the environmental cleanup work. DEQ may make public announcements and respond to all inquiries relating to the environmental cleanup work in this Agreement. DEQ reserves the right to approve all press releases and publications where the agency is mentioned or included before publication. The agency shall provide a contact for publicity approval within ten (10) days of execution of the Agreement. The City shall have the agency's approval before using the DEQ logo or moving any DEQ signs the agency has placed. The City and DEQ shall give the other party advance notice before making any public statement regarding work contemplated, undertaken, or completed pursuant to this Agreement.

VI. **TERMINATION:** This Agreement is expressly contingent upon funding and shall terminate without penalty either in whole or in part if funds are not made available to DEQ. Either party may terminate this Agreement by giving written notice at least sixty (60) days prior to the desired date of cancellation.

VII. **ACCEPTANCE OF AGREEMENT**: The parties acknowledge and agree that they have read the Agreement and that they accept the responsibilities with which they are charged. The City agrees to comply with the building use restrictions during cleanup and understands that failure to comply with said restrictions or failure to adhere to the responsibilities enumerated in this Agreement may result in delayed remediation. This Agreement shall not affect any pre-existing or independent relationships or obligations between the parties. The City's Acceptance of this Agreement from DEQ constitutes acceptance of all current DEQ Purchasing terms and conditions. Terms and conditions are subject to change and may be found at https://www.deq.ok.gov/wp-content/uploads/deqmainresources/DEQ-Terms-and-Conditions.pdf

VIII. **UNAUTHORIZED OBLIGATION:** At no time during the performance of this Agreement shall the City have the authority to obligate DEQ for payment of any goods or services.

In witness whereof, this Agreement, consisting of three (3) pages has been executed and delivered effective as of the date first above written.

Town of Luther
108 S. Main Street
PO Box 56
Luther, OK 73054

Scherrie Pidcock 8-24-2020
Authorized Representative Signature Date

Scherrie Pidcock, Town Manager
Authorized Representative Name, Title

Oklahoma Department of Environmental Quality
707 N. Robinson, P.O. Box 1677,
Oklahoma City, Oklahoma 73101-1677

Authorized Representative Signature Date

Authorized Representative Name, Title

"MANLY LEGAL BLANKS" FORM NO. 290-AF MANLY OFFICE SUPPLY CO.—PRINTERS—OKLA. CITY

(Order by Number) 69969

BOOK 3431 PAGE 663

This Space Reserved for Filing Stamp

WARRANTY DEED

Statutory Form---Individual

Know All Men by These Presents:

That E.J.Canada and Opal Canada, his wife

of Oklahoma County, State of Oklahoma, parties of the first part, in consideration of the sum of Ten and more DOLLARS in hand paid, the receipt of which is hereby acknowledged, does hereby Grant, Bargain, Sell and Convey unto The Town or City of Luther, of Oklahoma County, State of Oklahoma, parties of the second part, the following described real property and premises situate in Oklahoma County, State of Oklahoma, to-wit:

Lot Ten in Block Seven, of the Original Townsite to Luther, Oklahoma.
This includes an undivided one half interest in the North Wall of said Lot.

together with all the improvements thereon and the appurtenances thereunto belonging, and warrant the title to the same.

TO HAVE AND TO HOLD said described premises unto the said parties of the second part, their heirs and assigns forever, free, clear and discharged of and from all former grants, charges, taxes, judgments, mortgages and other liens and incumbrances of whatsoever nature.

This is a gift to the City and requires no Revenue Stamps.

Signed and delivered this 9th day of December, 19 66

E.J.Canada
E.J.Canada

Opal Canada
Opal Canada

STATE OF OKLAHOMA }
COUNTY OF Oklahoma } SS:

INDIVIDUAL ACKNOWLEDGMENT
Oklahoma Form

Before me, the undersigned, a Notary Public in and for said County and State on this 9th day of December, 19 66, personnally appeared E.J.Canada and Opal Canada, his wife

to me known to be the identical person s who executed the within and foregoing instrument and acknowledged to me that they executed the same as their free and voluntary act and deed for the uses and purposes therein set forth.

Given under my hand and seal the day and year last above written.

My commission expires Feb. 17, 1968 Curtis Fowler Notary Public.

MANLY OFFICE SUPPLY CO.—PRINTERS—OKLA. CITY

INDIVIDUAL ACKNOWLEDGMENT (Oklahoma Form)

STATE OF ______________ County of ______________, ss:

Before me the undersigned, a Notary Public, in and for said County and State, on this ______ day of ______________, 19____,

personally appeared ______________

to me known to be the identical person______ who executed the within and foregoing instrument and acknowledged to me that ________ executed the same as ________ free and voluntary act and deed for the uses and purposes therein set forth.

Given under my hand and seal the day and year last above written.

My commission expires ______________ ______________ Notary Public

INDIVIDUAL ACKNOWLEDGMENT (Oklahoma Form)

STATE OF ______________ County of ______________, ss:

Before me the undersigned, a Notary Public, in and for said County and State, on this ______ day of ______________, 19____,

personally appeared ______________

to me known to be the identical person______ who executed the within and foregoing instrument and acknowledged to me that ________ executed the same as ________ free and voluntary act and deed for the uses and purposes therein set forth.

Given under my hand and seal the day and year last above written.

My commission expires ______________ ______________ Notary Public

FORM NO. 290-AF (ORDER BY NUMBER)

69969

WARRANTY DEED

Statutory Form Individual

FROM

Ej + apal Carpenter

TO

City of Luther

STATE OF OKLAHOMA } ss. OKLAHOMA COUNTY } ss

RECORDED OR FILED

This instrument was filed for record on the DEC 15 9 38 AM '66 day of ______ at ______ o'clock ______ and duly recorded in Book 3443 at page 63

Fee $1.50

JOE MATTOX COUNTY CLERK

By ______ DEPUTY

County Clerk.

By ______ Deputy.

RETURN TO

City of Luther
Box 127
Luther, Okla. 73054
236
Luther

HARLY OFFICE SUPPLY CO.—OKLA. CITY

NOTARY ACKNOWLEDGMENT of SIGNATURE BY MARK (Oklahoma Form)

STATE OF ______________ County of ______________, ss:

Before me, ______________, a Notary Public in and for said County and State on this ______

day of ______________, 19____, personally appeared ______________

____

to me known to be the identical person____ who executed the within and foregoing instrument by ______________ mark in my presence and in the presence of ______________

as witnesses and acknowledged to me that ______________ executed the same as ______________ free and voluntary act and deed for the uses and purposes therein set forth.

In Witness Whereof, I have hereunto set my hand and official seal the day and year last above written.

My commission expires ______________ ______________ Notary Public

NOTE—The signature by mark of a lessor who cannot write his name must be witnessed by two witnesses, one of whom must write lessor's name.

Inspection Reports

FORMER CITY OF LUTHER TOWN HALL

119 SOUTH MAIN STREET
LUTHER, OK 73054

JUNE 19, 2020	*ASBESTOS INSPECTION*

SERVICES PROVIDED FOR:

ODEQ Land Protection Division
Attention: Alisha Grayson| Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alisha.grayson@deq.ok.gov

SERVICES PROVIDED BY:

Marshall Environmental Management, Incorporated
Attention: Jamie Marshall | President
1301 North Martin Luther King Avenue
Oklahoma City, OK 73117
405.616.0401 | mem@marshallenvironmental.com

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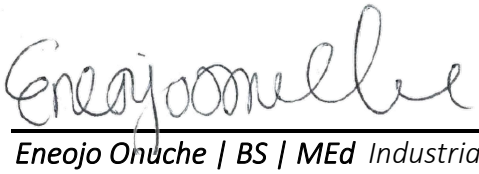
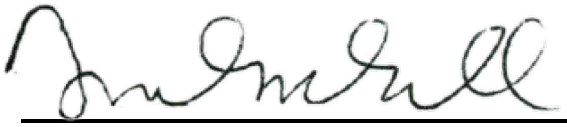
CERTIFICATION

This is to certify that Marshall Environmental Management, Incorporated (MEM) was contracted by Alisha Grayson on behalf of Oklahoma Department of Environmental Quality Land Protection Division, to conduct an Asbestos Inspection within the former City of Luther Town Hall building located at 119 South Main Street in Luther, Oklahoma. This inspection was performed on February 19th of 2020 by an Asbestos Hazard Emergency Response Act (AHERA) Inspector, certified by the Environmental Protection Agency (EPA) and licensed by the Oklahoma Department of Labor (ODOL). The findings and analytical data resulting from this inspection are believed to accurately depict the condition and location of material(s) that contain asbestos on the date this inspection was conducted. Applicable certifications and licensure are included in the appendix to this report.



June 19, 2020

Eneojo Onuche | BS | MEd *Industrial Hygienist* ***Report Date***
EPA AHERA Asbestos Inspector Certification #: 803959
ODOL Asbestos Inspector License #: OK401505



June 19, 2020

Jamie Marshall | MS | CIH ***Report Date***
President
EPA AHERA Asbestos Inspector/Management Planner | Certification #: 703804
ODOL Asbestos Inspector/Management Planner | License #: 400477
EPA AHERA Asbestos Project Designer | Certification #: 600739
ODOL Asbestos Project Designer | License #: OK-PD400478

LABORATORY ANALYSIS PERFORMED BY:

Marshall Environmental Management, Inc.
1301 North Martin Luther King Avenue
Oklahoma City, Oklahoma 73117
Laboratory Accreditation: AIHA PAT ID #: 102334

FORMER CITY OF LUTHER TOWN HALL
ASBESTOS INSPECTION

EXECUTIVE SUMMARY

On February 19th of 2020, MEM conducted an asbestos inspection within the Former City of Luther Town Hall located at 119 South Main Street in Luther, Oklahoma so that a strategy that follows the regulations set forth by the EPA may be prepared for the management and/or abatement (i.e. the removal and disposal) of material(s) that contain asbestos. The EPA and the ODOL define an Asbestos-Containing Material (ACM) as any material that contains asbestos in concentrations greater than one percent (>1%). Materials that contain asbestos can exist in a structure as long as they remain undisturbed and in good condition, though specific ACM must be abated prior to the commencement of certain renovation and demolition activities. As such, laboratory analysis confirmed ***asbestos-containing floor tile, ceiling texture and ceiling joint compound*** were identified throughout the first floor of the building as a result of this inspection. The sampling location, condition, type and quantity of material(s) identified as asbestos containing, during this inspection, are summarized in the Observations and Findings portion of this report.

While on site, most of the building materials that were inspected appeared to be good condition. In accordance with the EPA, the asbestos-containing floor tile are considered ***non-friable,*** which cannot be rendered to a powder via hand pressure. As a result, the floor tile is categorized as ***Category I Non-Friable ACM***. In addition, the asbestos-containing ceiling texture and joint compound are considered friable, that which can be rendered to a powder via hand pressure; and therefore, is categorized as a Regulated ACM (i.e. the abatement is regulated by the ODOL). Subsequently, the asbestos-containing ceiling joint compound and ceiling texture must be abated prior to the commencement of certain renovation/demolition activities. However, it should be noted that floor tile can remain in place during demolition.

Accordingly, the abatement of the texture, joint compound and floor tile must be carried out as ***Class II Work*** in accordance with the Occupational Safety and Health Administration (OSHA). Adequate training and the appropriate certifications and licensure must be in place prior to the commencement of abatement activities. Though the abatement of the floor tile is not regulated by the ODOL, an Asbestos-Abatement Contractor, licensed by the ODOL, is recommended to perform the abatement to ensure that EPA and OSHA-compliant methods are utilized. An ***EPA National Emission Standard for Hazardous Air Pollutants (NESHAP) Notification*** must be submitted to and approved by the Oklahoma Department of Environmental Quality (ODEQ) ten business days prior to the commencement of certain abatement/renovation and any demolition activities. The remainder of this Report is comprised of the Sampling Strategy and Methodology, Observations and Findings, Response Actions, Regulatory Review, Limitations of the Survey and the Appendix to this Report.

SAMPLING STRATEGY & METHODOLOGY

In order to collect materials suspected of containing asbestos, each accessible area, limited to the scope of work was systematically inspected. The sample collection process included documenting the location, condition, classification and estimated quantity of material(s) that contain asbestos. A specified number of samples were collected from material(s) that are uniform in color and texture and believed to be applied during the same period (i.e. homogenous material). If laboratory analyses determine that the sample(s) contain asbestos, the entirety of the homogenous material(s) is considered asbestos-containing. This Asbestos Inspection was conducted in accordance with NESHAP 40-Code of Federal Regulation (CFR) 61 Subpart M. Additionally, each sample collected was submitted for analysis in accordance with the EPA authorized method 600 49-CFR Part 61 § M Asbestos NESHAP Rules. The following are examples of the types of materials that were visually inspected and/or sampled during this inspection:

SURFACING MATERIAL

- Examples include, but are not limited to, blown or troweled on surfacing material commonly observed on ceilings, walls or structural steel.

THERMAL SYSTEM INSULATION (TSI)

- Examples include, but are not limited to, insulation on piping, thermal process or Heating Ventilation and Air Conditioning (HVAC) equipment and components.

MISCELLANEOUS MATERIAL

- Examples include, but are not limited to, floor and ceiling tiles, mastics, vinyl sheet-flooring, wallboard, wallboard-tape, and mud or joint compounds.

OBSERVATIONS & FINDINGS

The Former City of Luther Town Hall is a two-story loft located at 119 South Main Street in Luther, Oklahoma. It was constructed circa 1928. The first floor of the building consists of concrete/carpeted flooring with vinyl floor tile in a small portion of Room 3. The interior consists of plaster walls, drywalls and particle board siding. The second floor consists of drywalls, concrete walls and wooden/carpeted flooring. The building exterior is comprised of a brick façade. Four homogenous areas were identified within the building (i.e. first floor offices area, Machine Shop and the second floor). The Machine Shop walls are mostly comprised of plaster and particle board. The office within the shop office consist of drywalls, wood, and floor tiles.

While on site, no suspect surfacing or TSI materials were identified. Alternatively, suspect wall systems, ceiling tiles and floor tile was present onsite and sampled as part of this inspection. Subsequently, asbestos-containing *ceiling texture, ceiling joint compound and floor tile* were identified on the first floor of the building. It should be noted that because the samples collected of the first-floor ceiling texture and ceiling joint compound were positive, with the exception of the Machine Shop, the entire ceiling system within the first floor is considered as ACM. The ACM floor tile was identified within a small portion of first floor Room 3 (See attached floor plan for location). It should be noted that historical records on prior renovations within the building was not provided for review, though it was reported that the second floor was previously renovated. The following tables summarize the homogenous location, condition, type, percent and quantity of the ACM that was identified during this inspection. The correlating analytical data, area diagram and photographs (illustrating sampling locations) are included in the appendix to this report.

ASBESTOS-CONTAINING MATERIALS

The tables below shows the locations, descriptions and the quantity of the ACM identified throughout the building.

TABLE I: FORMER CITY OF LUTHER FORMER TOWN HALL - ACM IDENTIFIED

SAMPLE NUMBERS	ACM DESCRIPTION	HOMOGENOUS LOCATIONS	CONDITION	TYPE	% ASBESTOS/TYPE	NESHAP CLASSIFICATION	TOTAL QUANTITY	ESTIMATED COST	NOTES
PLM 23-25	9x9 Dark Red Floor Tile	1st Floor Room 3	Good	Misc.	3% Chrysotile	Category I Non-Friable	24-FT^2	$1000	It is limited to the northeast corner of Room 3 as shown on the floor plan
PLM 32-40	Texture and Joint Compound	1st Floor Room 1-7 – Ceilings	Good	Misc.	2% Chrysotile	Friable ACM	1,320-FT^2	$9,550	Located on the ceilings only throughout the entire 1st floor, excluding the Machine Shop
TOTAL ESTIMATED PRICE FOR ABATEMENT								$10,550	
TOTAL ESTIMATED COST OF PROJECT DESIGN & THIRD-PARTY AIR MONITORING								$1,750	
TOTAL ESTIMATED COST OF ABATEMENT TO INCLUDE THIRD-PARTY AIR MONITORING								**$12,300**	

REGULATED ASBESTOS-RESPONSE ACTIONS

- The Friable ACM (i.e. ceiling joint compound and ceiling texture) must be abated prior to the commencement of certain renovation and demolition activities.
- The abatement of the asbestos-containing ceiling joint compound, ceiling texture and floor tile must be carried out as ***Class II Work*** in accordance with OSHA.
- According to the ODOL, an Asbestos-Abatement Contractor, licensed by the ODOL, is required to perform the abatement of the Friable ACM (i.e. ceiling joint compound/texture).
- Adequate training and the appropriate certifications and licensure must be in place prior to the commencement of friable-abatement activities.
- An Asbestos-Abatement Project Design must be prepared and approved by the ODOL prior to the abatement of the Friable ACM with Third-Party Asbestos Abatement Air Monitoring while the abatement is taking place.
- An EPA NESHAP Notification must be submitted to and approved by the ODEQ ten business days prior to the commencement of certain abatement and/or renovation and any demolition activities.

REGULATORY REVIEW

Asbestos Containing Materials are any materials which consist of >1% asbestos, as defined by the EPA-Approved Analytical Method 40 CFR Chapter I, Part 763, Subpart F, Appendix C, referred to as *Interim Method for determination of Asbestos in Bulk Insulation Samples*, using Polarized Light Microscopy (PLM), US EPA 600/M4-82-020 1982. Prior to 1980, asbestos was commonly utilized during construction in addition to being found in various building materials. In 1994, OSHA required employers to identify ACM in pre-1980 construction as part of its Standard for Occupational Exposure to Asbestos in Construction (29 CFR 1926.1101). This OSHA standard covers maintenance, repair, and removal functions involving ACM or Presumed ACM (PACM). In addition, the OSHA General Industry Standard (29 CFR 1910.1001) also requires employers to notify employees who would be performing housekeeping activities in public and commercial buildings around ACM or PACM. Without asbestos inspections, owners and/or operators must treat suspected ACM as asbestos-containing.

As part of the ODOL Public Employees Occupational Safety and Health (PEOSH) Program, the Oklahoma Occupational Health and Safety Standards Act and Administrative Rules (OAC 380:40) adopts most of the Federal OSHA Standards. In accordance with 29 CRF 1910.1001, the OSHA Asbestos Standard, when a building owner or employer identifies previously installed ACM and/or PACM, labels or signs shall be affixed or posted so that employees will be notified of what materials contain ACM and/or PACM. Warning signs shall be provided and displayed at all approaches to and inside regulated areas so that an employee may read the signs and take necessary protective steps before entering the area. The asbestos warning labels are to be readily visible and include the following warning:

DANGER
ASBESTOS

MAY CAUSE CANCER
ASBESTOS CAUSES DAMAGE TO LUNGS
AUTHORIZED PERSONNEL ONLY

The EPA requires asbestos inspections in school buildings in grades Kindergarten through 12 as part of the Asbestos Hazard Emergency Response Act (AHERA), which is authorized in 40 CFR 763.6. The AHERA sampling protocol addresses the systematic sample collection of all forms of ACM in addition to categorizing ACM materials as friable Category I or II non-friable. An AHERA Inspection must also evaluate the condition and the potential for disturbance of ACM. If asbestos is present within school facilities grades K-12, an Asbestos Management Plan is required by the Local Educational Authority (LEA) to be in place.

Along with AHERA, the EPA also regulates commercial asbestos abatement activities. A NESHAP notification must be submitted to the Oklahoma Department of Environmental Quality (ODEQ) ten-business days prior to the initiation of certain abatement/renovation and any demolition activities where ACM are present in quantities that meet or exceed 160-square feet ($ft.^2$), 260-linear ft. or 35-cubic ft. ($ft.^3$). Instructions regarding NESHAP notification requirements and ODEQ compliance are provided on the DEQ website: *http://www.deq.state.ok.us/aqdnew/asbestos/index.htm.* Land disposal requirements are also regulated by the EPA through State Landfill Permits. These efforts are now administered by the ODEQ Air Quality and Land Protection regulations. The ODEQ requires the advance filing of a NESHAP notification when any demolition or renovation activities take place. The NESHAP notification process tracks abated ACM to an ODEQ approved landfill on a project-by-project basis.

The ODOL Asbestos Division regulates asbestos abatement by implementing the rules that govern the abatement of friable ACM. Under the ODOL asbestos rule, OAC 380:50, only adequately licensed contractors can perform asbestos abatement, develop management plans and project designs. All abatement supervisors, abatement workers and asbestos inspectors must be licensed by the ODOL. The ODOL Rules are available on the ODOL web site: *http://www.ok.gov/odol/*.

LIMITATIONS OF SURVEY

This asbestos inspection was limited to certain aspects of the building construction. Certain limitations can restrict and/or prevent the complete inspection of hidden or inaccessible building materials. Furthermore, locations presenting a hazard to bystanders or the inspector were not assessed. The findings resulting from this inspection are valid as of the date this inspection was performed. However, changes in the condition of a structure may certainly occur with the passage of time, whether due to natural processes or the works of man. Additionally, changes in applicable or appropriate standards may also occur possibly resulting from legislation or the expansion of knowledge.

Our investigation was conducted using the degree of care and skill ordinarily exercised by professional consultants under similar circumstances practicing in this or similar localities. Professional services have been performed; results associated with this inspection were obtained and reported in accordance with generally accepted principles and practices. No other representations, either expressed or implied, are made. Marshall Environmental Management, Incorporated is not responsible for independent conclusions, opinions or

recommendations made by others. It should also be noted that as-built plans were not available for review or use in the planning of this asbestos inspection.

ATTACHMENTS

CHAIN OF CUSTODY & LABORATORY ANALYSES

AREA DIAGRAM & PHOTOGRAPHS

ILLUSTRATING ACM LOCATIONS

CERTIFICATION/LICENSURE

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.
1301 N MARTIN LUTHER KING AVENUE
OKLAHOMA CITY, OK 73117
405.616.0401 | FAX: 405.681.6753 | MEM@marshallenvironmental.com
www.marshallenvironmental.com

CHAIN OF CUSTODY

PROJECT INFORMATION

PROJECT ID. NO.	0010-EN-010820-30
PROJECT NAME	City of Luther Town Hall
ADDRESS	119 S Main Street
CITY| STATE| ZIP	Luther, OK 73054
CONTACT	Scherrie Pidcock
PHONE NUMBER	405-277-3833
EMAIL ADDRESS	

CONTACT INFORMATION

COMPANY	Oklahoma DEQ Land Protection Division
ATTENTION	Alisha Grayson, Environmental Project Specialist
ADDRESS	PO Box 1677
CITY| STATE| ZIP	Oklahoma City, OK 73101
PHONE NUMBER	405.702.5113
ALTERNATE NO.	405.436.0953
EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE TURN-AROUND-TIME

X STANDARD (5-7 business) | NEXT DAY | SAME DAY

SAMPLE MATRIX / MEDIA

MP MOLD PLATE | ST SPORE TRAP | TL TAPE LIFT | X BULK | O OTHER

SAMPLE IDENTIFICATION NUMBER LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.	SAMPLE LOCATION / DESCRIPTION	TIME / UNITS / CONDITION	FUNGI: TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	ASBESTOS: AIRBORNE FIBER COUNT (NIOSH 7400)	ASBESTOS: BULK MATERIAL (EPA METHOD 600/R-93-116)	OTHER
0030	02/19/20	PLM	01	Rm-3 Ceiling Wall System East Floor 2	~~Intact~~ Damaged					X	
			02	West							
			03	North							
			04	Rm-3 Floor 2 Ceiling Insulation West							
			05	East							
			06	North							
			07	Floor 2 room 3 Wall System South	Intact						
			08	East							
			09	West							
			10	North							

COLLECTED BY	Jacob Bartels	DATE	2/19/20	RELINQUISHED BY	DATE 2/19/20
		TIME	11:00 AM		TIME 1:00 PM
RECEIVED BY IN LABORATORY		DATE	02/19/20	LABORATORY NOTES	acceptable
		TIME	1300		

FIELD NOTES

METHOD OF SHIPMENT: Hand Delivery

PAGE NUMBER 1 OF 5

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.
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OKLAHOMA CITY, OK 73117
405.616.0401 | FAX: 405.681.6753 | MEM@marshallenvironmental.com
www.marshallenvironmental.com

CHAIN OF CUSTODY

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.		COMPANY	
PROJECT NAME		ATTENTION	
ADDRESS	See Page 1	ADDRESS	See Page 1
CITY| STATE| ZIP		CITY| STATE| ZIP	
CONTACT		PHONE NUMBER	
PHONE NUMBER		ALTERNATE NO.	
EMAIL ADDRESS		EMAIL ADDRESS	

SAMPLE TURN-AROUND-TIME

	STANDARD (5-7 business)		NEXT DAY		SAME DAY
X					

SAMPLE MATRIX / MEDIA

MP	MOLD PLATE	ST	SPORE TRAP	TL	TAPE LIFT	B	BULK	O	OTHER
						X			

SAMPLE IDENTIFICATION NUMBER				SAMPLE LOCATION / DESCRIPTION				TIME / UNITS / CONDITION	FUNGI			ASBESTOS		OTHER
LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.						TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	AIRBORNE FIBER COUNT (NIOSH 7400)	BULK MATERIAL (EPA METHOD 600/R-93-116)	
0030	02/19/20	PLM	11	Floor 2	Room 2	Wall Ceiling System	NE	Intact					X	
			12		Room 4		N							
			13		Room 4	Wall System	E							
			14		Room 1	Ceiling System	W							
			15				E							
			16				N							
			17			Behind Wood Panel Wall System	E							
			18				W							
			19				N							
			20	Floor 1	Room 2		E							

COLLECTED BY	Jacob Bartels	DATE	02/19/20	RELINQUISHED BY		DATE	2/19/20
		TIME	11:00 AM			TIME	1:00pm
RECEIVED BY IN LABORATORY		DATE	02/19/20	LABORATORY NOTES	acceptable		
		TIME	1300				

FIELD NOTES		METHOD OF SHIPMENT	Hand Delivery	PAGE NUMBER	2	OF	5

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CHAIN OF CUSTODY

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.		COMPANY	
PROJECT NAME		ATTENTION	
ADDRESS	See Page 1	ADDRESS	See Page 1
CITY| STATE| ZIP		CITY| STATE| ZIP	
CONTACT		PHONE NUMBER	
PHONE NUMBER		ALTERNATE NO.	
EMAIL ADDRESS		EMAIL ADDRESS	

SAMPLE TURN-AROUND-TIME

	STANDARD (5-7 business		NEXT DAY		SAME DAY
X					

SAMPLE MATRIX / MEDIA

MP	MOLD PLATE	ST	SPORE TRAP	TL	TAPE LIFT	B	BULK	O	OTHER
						X			

SAMPLE IDENTIFICATION NUMBER LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.	SAMPLE LOCATION / DESCRIPTION	TIME / UNITS / CONDITION	TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	AIRBORNE FIBER COUNT (NIOSH 7400)	BULK MATERIAL (EPA METHOD 600/R-93-116)	OTHER
0030	02/19/20	PLM	21	Floor 1 Room 3 Wall System behind wood panel S	Intact					X	
			22	W							
			23	Vinyl Floor Tile - E							
			24	N							
			25	S							
			26	Bathroom Vinyl Floor Tile W							
			27	Room 6 E							
			28	Room 3 Vinyl Floor Tile SW corner							
			29	Room 5 Wall System W							
			30	S							

COLLECTED BY	Jacob Bartels	DATE	2/19/20	RELINQUISHED BY		DATE	2/19/20
		TIME	11:00 Am			TIME	1:00pm
RECEIVED BY IN LABORATORY		DATE	02/19/20	LABORATORY NOTES	acceptable		
		TIME	1300				

FIELD NOTES		METHOD OF SHIPMENT	Hand Delivery	PAGE NUMBER	3	OF	5

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CHAIN OF CUSTODY

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.		COMPANY	
PROJECT NAME		ATTENTION	
ADDRESS	See Page 1	ADDRESS	See Page 1
CITY| STATE| ZIP		CITY| STATE| ZIP	
CONTACT		PHONE NUMBER	
PHONE NUMBER		ALTERNATE NO.	
EMAIL ADDRESS		EMAIL ADDRESS	

SAMPLE TURN-AROUND-TIME

X STANDARD (5-7 business)		NEXT DAY		SAME DAY

SAMPLE MATRIX / MEDIA

MP	MOLD PLATE	ST	SPORE TRAP	TL	TAPE LIFT	X B	BULK

O OTHER _____

SAMPLE IDENTIFICATION NUMBER LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.	SAMPLE LOCATION / DESCRIPTION	TIME / UNITS / CONDITION	FUNGI: TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	ASBESTOS: AIRBORNE FIBER COUNT (NIOSH 7400)	ASBESTOS: BULK MATERIAL (EPA METHOD 600/R-93-116)	OTHER
0030	02/19/20	PLM	31	Floor 1 Room 5 Wall System E	Intact					X	
			32	Room 3 Ceiling System S							
			33	Room 4 Ceiling System S							
			34	Room 1 ↓ NE							
			35	Room 7 Lower Ceiling System NE							
			36	↓ SE							
			37	↓ NW							
			38	Upper Ceiling System NE							
			39	↓ SE							
↓	↓	↓	40	↓ NW	↓					↓	

COLLECTED BY	Jacob Barzels	DATE	2/19/20	RELINQUISHED BY		DATE	2/19/20
		TIME	11:00 AM			TIME	1:00 PM
RECEIVED BY IN LABORATORY		DATE	02/19/20	LABORATORY NOTES	acceptable		
		TIME	1300				

FIELD NOTES		METHOD OF SHIPMENT	Hand Delivery	PAGE NUMBER	4	OF 5

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CHAIN OF CUSTODY

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.		COMPANY	
PROJECT NAME		ATTENTION	
ADDRESS	See Page 1	ADDRESS	See Page 1
CITY| STATE| ZIP		CITY| STATE| ZIP	
CONTACT		PHONE NUMBER	
PHONE NUMBER		ALTERNATE NO.	
EMAIL ADDRESS		EMAIL ADDRESS	

SAMPLE TURN-AROUND-TIME

X	STANDARD (5-7 business		NEXT DAY		SAME DAY

SAMPLE MATRIX / MEDIA

MP	MOLD PLATE	ST	SPORE TRAP	TL	TAPE LIFT	X	BULK	O	OTHER

SAMPLE IDENTIFICATION NUMBER LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.	SAMPLE LOCATION / DESCRIPTION	TIME / UNITS / CONDITION	FUNGI: TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	FUNGI: TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	ASBESTOS: AIRBORNE FIBER COUNT (NIOSH 7400)	ASBESTOS: BULK MATERIAL (EPA METHOD 600/R-93-116)	OTHER
0030	2/19/20	PLM	41	Machine Shop — Vinyl Floor Tile — Bathroom S	Intact					X	
			42	N							
			43	E							
			44	Store Room — Wall System SE							
			45	Office SE							
			46	Bathroom SE							
			47	Floor 1 - under stairs to main building - Ceiling System S							
			48	W							
			49	N							

COLLECTED BY	Jacob Bartels	DATE	2/19/20	RELINQUISHED BY	DATE 2/19/20
		TIME	11:00 Am		TIME 11:00PM
RECEIVED BY IN LABORATORY		DATE	02/19/20	LABORATORY NOTES	acceptable
		TIME	1300		

FIELD NOTES

METHOD OF SHIPMENT: Hand Delivery

PAGE NUMBER 5 OF 5

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BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-01	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-02	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-03	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-04A	Insulation	Brown	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-04B	Backing	Black	NO ASBESTOS DETECTED	90% Cellulose 10% Tar
0030-021920-PLM-05A	Insulation	Brown	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-05B	Backing	Black	NO ASBESTOS DETECTED	90% Cellulose 10% Tar
0030-021920-PLM-06A	Insulation	Brown	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-06B	Backing	Black	NO ASBESTOS DETECTED	90% Cellulose 10% Tar
0030-021920-PLM-07A	Texture	White	NO ASBESTOS DETECTED	100% Calcium Carbonate

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-07B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-08A	Texture	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-08B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-09	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-10A	Texture	White	NO ASBESTOS DETECTED	90% Foam 10% Paint
0030-021920-PLM-10B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-10C	Joint Compound	White	NO ASBESTOS DETECTED	100% Foam
0030-021920-PLM-10D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-11A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-11B	Tape	White	NO ASBESTOS DETECTED	100% Fibrous Glass

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-11C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-11D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-12A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-12B	Tape	White	NO ASBESTOS DETECTED	100% Fibrous Glass
0030-021920-PLM-12C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-12D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-13A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-13B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-14A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-14B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

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PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-14C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-14D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-15A	Texture	White	NO ASBESTOS DETECTED	70% Calcium Carbonate 10% Paint 20% Vermiculite
0030-021920-PLM-15B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-15C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-15D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-16A	Texture	White	NO ASBESTOS DETECTED	70% Calcium Carbonate 10% Paint 20% Vermiculite
0030-021920-PLM-16B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-16C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-16D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-17A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-17B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-17C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-17D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-18A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-18B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-18C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-18D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-19A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-19B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

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PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS		% MATRIX	
0030-021920-PLM-20	Drywall	White	NO ASBESTOS DETECTED		85%	Gypsum
					15%	Cellulose
0030-021920-PLM-21A	Texture	White	NO ASBESTOS DETECTED		90%	Calcium Carbonate
					10%	Paint
0030-021920-PLM-21B	Drywall	White	NO ASBESTOS DETECTED		85%	Gypsum
					15%	Cellulose
0030-021920-PLM-22	Drywall	White	NO ASBESTOS DETECTED		85%	Gypsum
					15%	Cellulose
0030-021920-PLM-23A	Floor Tile	Dark Red	3%	Chrysotile	97%	Vinyl Aggregate
0030-021920-PLM-23B	Mastic	Yellow	NO ASBESTOS DETECTED		90%	Adhesive
					10%	Aggregate
0030-021920-PLM-24A	Floor Tile	Dark Red	3%	Chrysotile	97%	Vinyl Aggregate
0030-021920-PLM-24B	Mastic	Yellow	NO ASBESTOS DETECTED		90%	Adhesive
					10%	Aggregate
0030-021920-PLM-25A	Floor Tile	Dark Red	3%	Chrysotile	97%	Vinyl Aggregate
0030-021920-PLM-25B	Mastic	Yellow	NO ASBESTOS DETECTED		90%	Adhesive
					10%	Aggregate

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.
1301 N MARTIN LUTHER KING AVENUE
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405.616.0401 | FAX: 405.681.6753 | MEM@marshallenvironmental.com
www.marshallenvironmental.com

BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-26A	Sheet Vinyl	Beige	NO ASBESTOS DETECTED	60% Vinyl 40% Cellulose
0030-021920-PLM-26B	Mastic	Yellow	NO ASBESTOS DETECTED	100% Adhesive
0030-021920-PLM-27A	Sheet Vinyl	Beige	NO ASBESTOS DETECTED	60% Vinyl 40% Cellulose
0030-021920-PLM-27B	Mastic	Yellow	NO ASBESTOS DETECTED	100% Adhesive
0030-021920-PLM-28A	Sheet Vinyl	Beige	NO ASBESTOS DETECTED	60% Vinyl 40% Cellulose
0030-021920-PLM-28B	Mastic	Yellow	NO ASBESTOS DETECTED	100% Adhesive
0030-021920-PLM-29A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-29B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-30A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-30B	Tape	White	NO ASBESTOS DETECTED	100% Fibrous Glass

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-30C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-30D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-31A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-31B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-31C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-31D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-32A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-32B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-32C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-32D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS		% MATRIX	
0030-021920-PLM-33A	Texture	White	2%	Chrysotile	88%	Calcium Carbonate
					10%	Paint
0030-021920-PLM-33B	Tape	White		NO ASBESTOS DETECTED	100%	Cellulose
0030-021920-PLM-33C	Joint Compound	White	2%	Chrysotile	98%	Calcium Carbonate
0030-021920-PLM-33D	Drywall	White		NO ASBESTOS DETECTED	85%	Gypsum
					15%	Cellulose
0030-021920-PLM-34A	Texture	White	2%	Chrysotile	88%	Calcium Carbonate
					10%	Paint
0030-021920-PLM-34B	Tape	White		NO ASBESTOS DETECTED	100%	Cellulose
0030-021920-PLM-34C	Joint Compound	White	2%	Chrysotile	98%	Calcium Carbonate
0030-021920-PLM-34D	Drywall	White		NO ASBESTOS DETECTED	85%	Gypsum
					15%	Cellulose
0030-021920-PLM-35	Ceiling Tile	White		NO ASBESTOS DETECTED	90%	Cellulose
					10%	Paint
0030-021920-PLM-36	Ceiling Tile	White		NO ASBESTOS DETECTED	90%	Cellulose
					10%	Paint

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-37	Ceiling Tile	White	NO ASBESTOS DETECTED	90% Cellulose 10% Paint
0030-021920-PLM-38A	Texture	White	NO ASBESTOS DETECTED	90% Calcium Carbonate 10% Paint
0030-021920-PLM-38B	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-39	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-40	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose
0030-021920-PLM-41A	Floor Tile	Tan	NO ASBESTOS DETECTED	100% Vinyl Aggregate
0030-021920-PLM-41B	Mastic	Pale Yellow	NO ASBESTOS DETECTED	100% Adhesive
0030-021920-PLM-42A	Floor Tile	Tan	NO ASBESTOS DETECTED	100% Vinyl Aggregate
0030-021920-PLM-42B	Mastic	Pale Yellow	NO ASBESTOS DETECTED	100% Adhesive
0030-021920-PLM-43A	Floor Tile	Tan	NO ASBESTOS DETECTED	100% Vinyl Aggregate

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
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SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX			
0030-021920-PLM-43B	Mastic	Pale Yellow	NO ASBESTOS DETECTED	100%	Adhesive		
0030-021920-PLM-44A	Texture	White	NO ASBESTOS DETECTED	90%			
				10%			
0030-021920-PLM-44B	Drywall	White	NO ASBESTOS DETECTED	85%	Gypsum		
				15%	Cellulose		
0030-021920-PLM-45A	Texture	White	NO ASBESTOS DETECTED	70%	Calcium Carbonate	10%	Paint
				20%	Vermiculite		
0030-021920-PLM-45B	Tape	White	NO ASBESTOS DETECTED	100%	Cellulose		
0030-021920-PLM-45C	Joint Compound	White	NO ASBESTOS DETECTED	100%	Calcium Carbonate		
0030-021920-PLM-45D	Drywall	White	NO ASBESTOS DETECTED	85%	Gypsum		
				15%	Cellulose		
0030-021920-PLM-46A	Texture	White	NO ASBESTOS DETECTED	70%	Calcium Carbonate	10%	Paint
				20%	Vermiculite		
0030-021920-PLM-46B	Tape	White	NO ASBESTOS DETECTED	100%	Cellulose		
0030-021920-PLM-46C	Joint Compound	White	NO ASBESTOS DETECTED	100%	Calcium Carbonate		

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX					
0030-021920-PLM-46D	Drywall	White	NO ASBESTOS DETECTED	85%	Gypsum				
				15%	Cellulose				
0030-021920-PLM-47A	Texture	White	NO ASBESTOS DETECTED	70%	Calcium Carbonate	10%	Paint		
				20%	Vermiculite				
0030-021920-PLM-47B	Tape	White	NO ASBESTOS DETECTED	100%	Cellulose				
0030-021920-PLM-47C	Joint Compound	White	NO ASBESTOS DETECTED	100%	Calcium Carbonate				
0030-021920-PLM-47D	Drywall	White	NO ASBESTOS DETECTED	85%	Gypsum				
				15%	Cellulose				
0030-021920-PLM-48A	Texture	White	NO ASBESTOS DETECTED	70%	Calcium Carbonate	10%	Paint		
				20%	Vermiculite				
0030-021920-PLM-48B	Tape	White	NO ASBESTOS DETECTED	100%	Cellulose				
0030-021920-PLM-48C	Joint Compound	White	NO ASBESTOS DETECTED	100%	Calcium Carbonate				
0030-021920-PLM-48D	Drywall	White	NO ASBESTOS DETECTED	85%	Gypsum				
				15%	Cellulose				
0030-021920-PLM-49A	Texture	White	NO ASBESTOS DETECTED	70%	Calcium Carbonate	10%	Paint		
				20%	Vermiculite				

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX
0030-021920-PLM-49B	Tape	White	NO ASBESTOS DETECTED	100% Cellulose
0030-021920-PLM-49C	Joint Compound	White	NO ASBESTOS DETECTED	100% Calcium Carbonate
0030-021920-PLM-49D	Drywall	White	NO ASBESTOS DETECTED	85% Gypsum 15% Cellulose

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

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CHAIN OF CUSTODY

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010 - EN - 010820 - JO	COMPANY	Oklahoma DEQ
PROJECT NAME	City of Luther Townhall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main St.	ADDRESS	P.O Box 1677
CITY| STATE| ZIP	Luther OK 73054	CITY| STATE| ZIP	OKC OK 73101
CONTACT	Sherrie Pidlock	PHONE NUMBER	405-702-5113
PHONE NUMBER	405-277-3833	ALTERNATE NO.	405-436-0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha-grayson@deq.OK.gov

SAMPLE TURN-AROUND-TIME

	STANDARD (5-7 business		NEXT DAY	X	SAME DAY

SAMPLE MATRIX / MEDIA

MP	MOLD PLATE	ST	SPORE TRAP	TL	TAPE LIFT	B	BULK	O	OTHER_____

SAMPLE IDENTIFICATION NUMBER				SAMPLE LOCATION / DESCRIPTION	TIME / UNITS / CONDITION	FUNGI			ASBESTOS		OTHER
LAB ID.	DATE COLLECTED	MATRIX/MEDIA	FIELD ID.			TOTAL-AIRBORNE FUNGI (ENUMERATION & GENUS ID)	CULTURABLE AIRBORNE FUNGI (ENUMERATION & GENUS ID)	TOTAL-SURFACE FUNGI (SEMI-QUANTITATIVE ENUMERATION & GENUS ID)	AIRBORNE FIBER COUNT (NIOSH 7400)	BULK MATERIAL (EPA METHOD 600/R-93-116)	
0078	6/17/20	PLM	01	Machine Plaster wall system - N	Damaged					X	
↓	↓	↓	02	↓ ↓ ↓ - E	↓					↓	
↓	↓	↓	03	↓ ↓ ↓ - W	↓					↓	

COLLECTED BY	Gregg Onuche	DATE	6/19/20	RELINQUISHED BY		DATE	6/19/20
		TIME	800			TIME	800
RECEIVED BY IN LABORATORY		DATE	06/19/20	LABORATORY NOTES	acceptable		
		TIME	0900				

FIELD NOTES		METHOD OF SHIPMENT	Hand Delivery	PAGE NUMBER	1	OF	1

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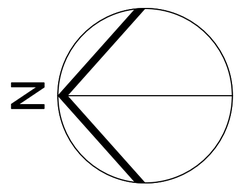
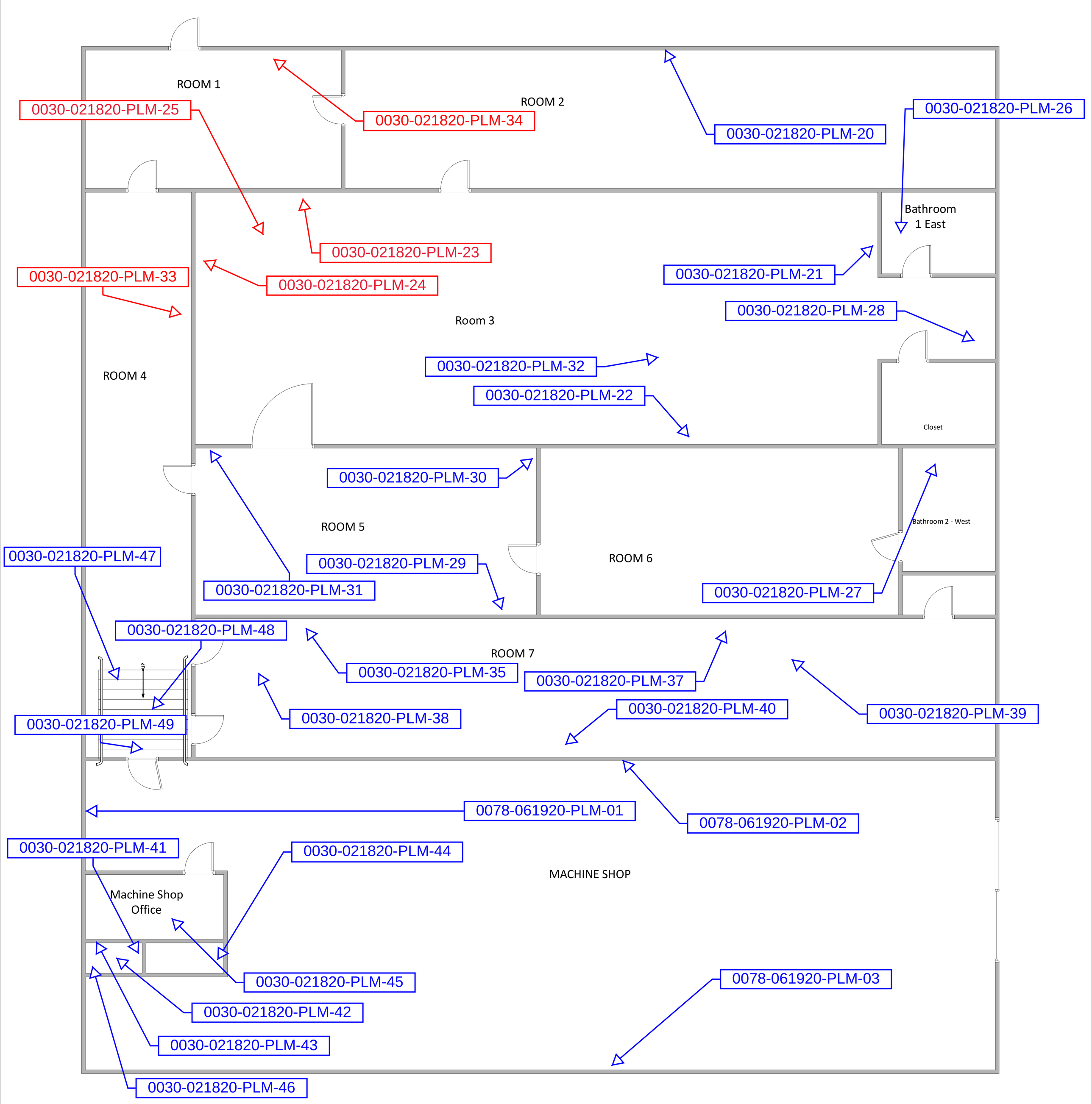
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Sherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS	% MATRIX			
0078-061720-PLM-01	Plaster	Tan	NO ASBESTOS DETECTED	40% Sand	20% Quartz		
				30% Silica	10% Paint		
0078-061720-PLM-02	Plaster	Tan	NO ASBESTOS DETECTED	40% Sand	20% Quartz		
				30% Silica	10% Paint		
0078-061720-PLM-03	Plaster	Tan	NO ASBESTOS DETECTED	40% Sand	20% Quartz		
				30% Silica	10% Paint		

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	6/19/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

FIRST FLOOR



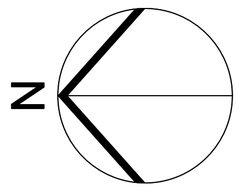


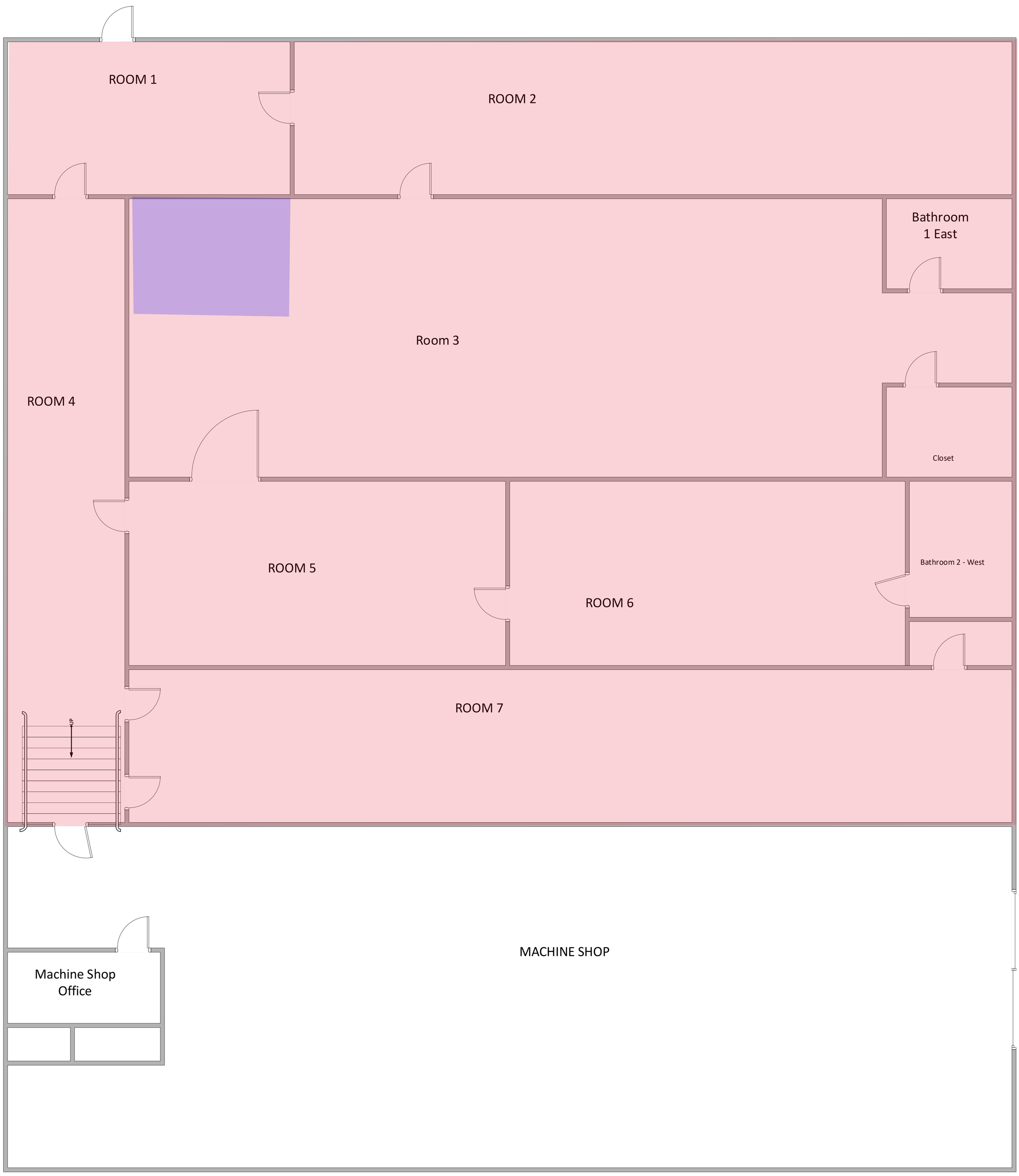
SAMPLE LOCATIONS

MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT	**FLOOR PLAN – FIRST FLOOR** CITY OF LUTHER FORMER TOWN HALL 119 SOUTH MAIN STREET LUTHER, OK 73054	1 FIGURE

FIRST FLOOR





Asbestos-containing floor tile location

Asbestos-containing ceiling texture/joint compound location

MAP IS NOT TO SCALE

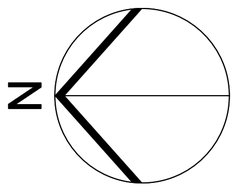
MARSHALL ENVIRONMENTAL MANAGEMENT

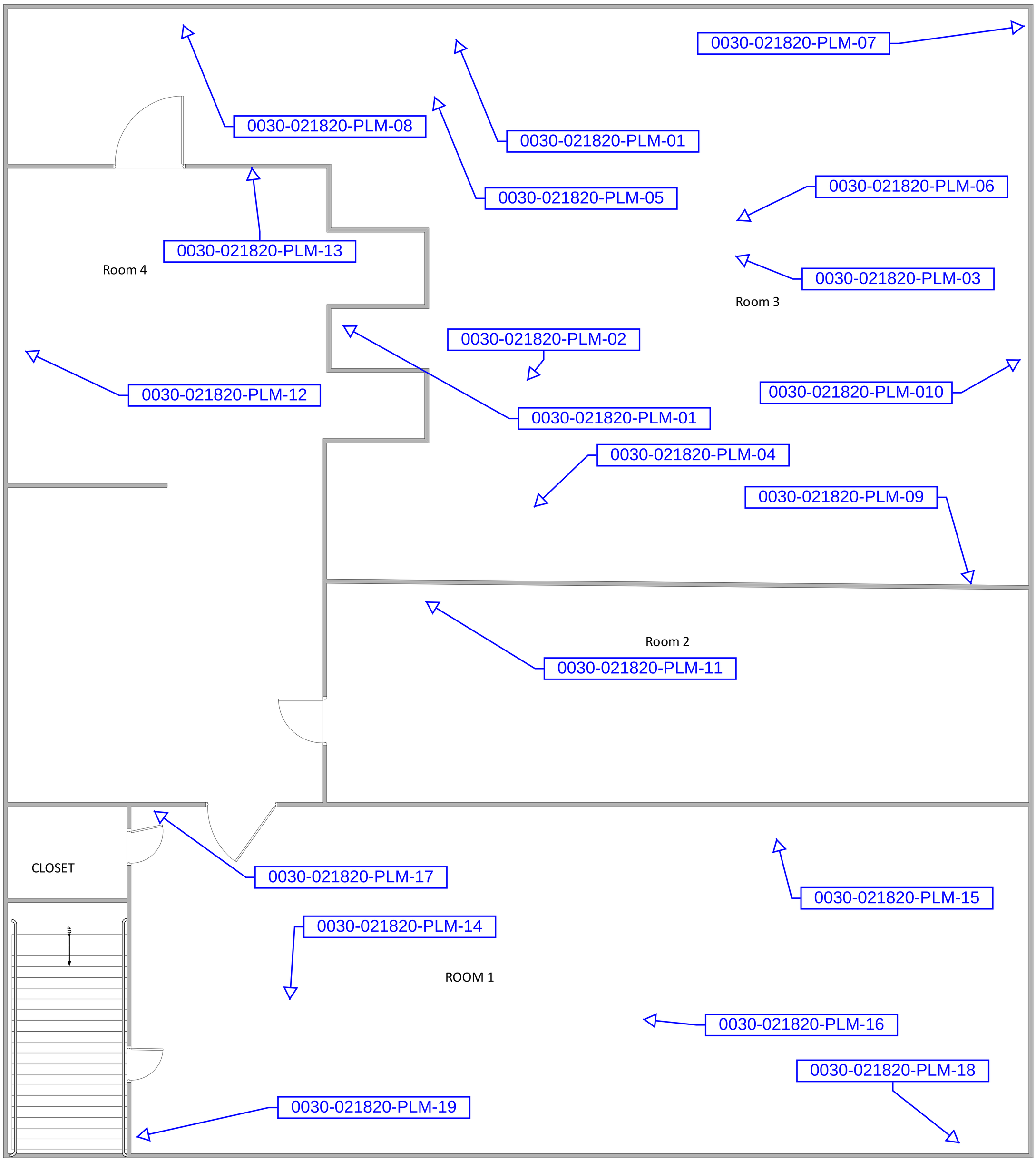
FIRST FLOOR ACM LOCATION

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

2
FIGURE

City of Luther
Former Town Hall
Floor 2





SAMPLE LOCATIONS

MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT	**FLOOR PLAN – SECOND FLOOR - SAMPLE LOCATIONS** CITY OF LUTHER FORMER TOWN HALL 119 SOUTH MAIN STREET LUTHER, OK 73054	3 FIGURE

BUILDING EXTERIOR - MAIN ENTRANCE

ACM CEILING SYSTEM - SAME CEILING THROUGHOUT FIRST FLOOR

MEM MARSHALL ENVIRONMENTAL MANAGEMENT	**CITY OF LUTHER TOWN HALL – PHOTO ALBUM**	4 FIGURE
	119 S MAIN STREET LUTHER, OKLAHOMA	

ROOM 3 - ACM VINYL FLOOR TILE

MACHINE SHOP/OFFICE - PARTICLE BOARD CEILING, WALL SIDING & PLASTER WALLS

MEM MARSHALL ENVIRONMENTAL MANAGEMENT	**CITY OF LUTHER TOWN HALL – PHOTO ALBUM**	5 FIGURE
	119 S MAIN STREET LUTHER, OKLAHOMA	

MACHINE SHOP OFFICE - COMPRISED OF WOOD & DRYWALLS

FORMER CITY OF LUTHER TOWN HALL

119 SOUTH MAIN STREET
LUTHER, OK 73054

JUNE 12, 2020

LEAD-BASED PAINT INSPECTION
SETTLED LEAD DUST SURVEY

SERVICES PROVIDED FOR:

ODEQ Land Protection Division
Attention: Alisha Grayson | Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alisha.grayson@deq.ok.gov

SERVICES PROVIDED BY:

Marshall Environmental Management, Incorporated
Attention: Jamie Marshall | President
1301 North Martin Luther King Avenue
Oklahoma City, OK 73117
405.616.0401 | mem@marshallenvironmental.com

TABLE OF CONTENTS

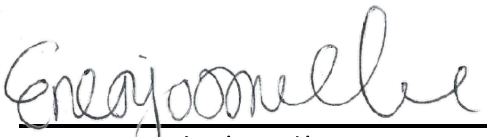
FORMER CITY OF LUTHER TOWN HALL

LEAD-BASED PAINT INSPECTION AND SETTLE LEAD DUST SURVEY

CERTIFICATION

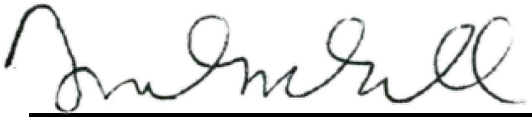
This is to certify that Marshall Environmental Management, Incorporated (MEM) was contracted by Rachel Franks on behalf of Oklahoma Department of Environmental Quality Land Protection Division, to conduct a Lead-Based Paint (LBP) Inspection and Settled Lead Dust Survey (SLD) of the Former City of Luther Town Hall building located at 119 South Main Street in Luther, Oklahoma. This inspection was performed on February 19th of 2020, by an LBP Inspector and Risk Assessor certified by the Oklahoma Department of Environmental Quality (ODEQ). Painted surfaces were analyzed for lead content utilizing an X-Ray Fluorescence (XRF) direct-reading, data-logging instrument (Heuresis Pb200i XRF Lead Paint Analyzer). Training for the instrument was provided by an ODEQ/EPA-approved course as required prior to obtaining the ODEQ LBP Inspector/Risk Assessor Certification. The instrumentation utilized was calibrated in accordance with manufacture specifications; therefore, the analytical data resulting from this inspection event is believed to reflect the concentrations of lead in paint that were present at the time this inspection was performed.

CERTIFIED LEAD-BASED PAINT INSPECTOR/RISK ASSESSORS



June 12, 2020

Eneojo Onuche | MEd| BS — Report Date
Industrial Hygienist
ODEQ Lead-Based Certification: OKRASR13853



June 12, 2020

Jamie Marshall | MS| CIH — Report Date
President
ODEQ Lead-Based Certification: OKRASR13418

SUMMARY

On February 19th of 2020, MEM conducted a LBP Inspection and SLD Survey of the Former City of Luther Town Hall located at 119 South Main Street in Luther, Oklahoma. According to the EPA, *Lead-Based Paint* (LBP) is characterized as paint that contains lead in concentrations greater than or equal to 1-milligram per square centimeter (≥1-mg/cm^2). As a result of this lead-based paint inspection event, no LBP was identified within the areas assessed throughout the building. Subsequently, the lead concentrations detected in the dust wipes samples collected from the floors with Room 3 of the second floor and the Machine Shop exceeded the Environmental Protection Agency (EPA) Lead Action Level for interior floors of target housing. The analytical data resulting from the LBP inspection and SLD survey are believed to reflect the concentration of LBP and lead dust that were present at the time of these inspections. The correlating analytical data, floorplan diagrams and photographs and applicable certifications/licensures are included as an attachment to this report. The remainder of this report includes the Analytical Findings, Disclosure Statement, Legal Obligation as well as information regarding LBP.

HISTORICAL OVERVIEW OF PROPERTY & LEAD-BASED PAINT ACTIVITIES

The Former City Luther Town Hall is a two-story loft located at 119 South Main Street in Luther, Oklahoma was constructed circa 1928. Historical records on prior renovations were not provided for review nor was there evidence or information that would suggest that a prior LBP Inspection or Risk Assessment occurred at said building.

SCOPE OF SERVICE

LBP INSPECTION

This LBP Inspection was accomplished so that the location(s) of paint that contain lead in concentrations ≥1-mg/cm^2, if present, could be identified. As part of this LBP Inspection, various painted surfaces, excluding non-fixed and factory-painted items, were representatively sampled and analyzed for lead content. Readings were taken from each of the combinations listed below for each accessible area of the building.

- Color: Lead is added to paints for pigmentation and corrosion resistance. MEM assumes that paints of similar color contains similar amounts of lead and, therefore, each color observed was tested.
- Substrate: Lead is used as a primer for various substrates. However, similar to topcoats, the undercoat primer and other paint layers could be different. It is assumed that, on each substrate type in the building (e.g., metal, wood, wallboard, and stucco), primer and undercoat paint are consistently applied and contain similar quantities of lead, if any. Thus, each substrate observed was tested.
- Building Components: Building components (e.g., walls, floor, and ceiling) could have been painted with different colors of paint throughout the history of the building. It is assumed that the different components had different primers and undercoats applied even though the topcoat colors appeared similar. It is also assumed that similar primer and paint had been applied underneath the top layer on similar building components. Thus, each building component observed was tested.

This LBP Inspection, however, was limited to certain aspects of the building construction that can restrict and/or prevent the complete inspection of hidden or inaccessible building components. Painted surfaces were analyzed for lead content utilizing an X-Ray Fluorescence (XRF), direct reading data-logging instrument *Heuresis Pb200i Lead Analyzer.* The street-facing side of the structure(s) was identified as side *A*, and going in a clockwise direction, the

remaining sides were categorized as side *B*, *C* and *D* respectively. Lastly, the client and/or owner representative were expected to provide access to the structure(s) in addition to notifying and providing, if necessary, an explanation of the LBP Inspection to the occupants. At the time this inspection was performed, no deviations from the scope of service occurred.

SURFACE LEAD DUST SURVEY

In addition to the LBP Inspection, samples were also collected of settled dust throughout the building. These samples were collected with a Lead Wipe that meets ASTM E1792 specifications utilizing a template. Utilizing disposable gloves, the wipe was used to sample the floor firmly at an upper corner of the template to make "S"-like motions across the entire one square-foot (1-ft^2) template. The wipe was folded in half, keeping the dirty side in, and the wiping procedure was repeated in the original direction in a forward and back motion. The wipe filter was folded again, and the wiping procedure was repeated, concentrating on collecting dust from the edges and corners of the sample area. The wipe filter was folded and placed inside the polyethylene capped tube for laboratory analysis. According to the EPA, settled dust collected from interior floor surfaces that contains lead in concentrations greater than 10-micrograms per-square-foot (>10-µg/ft2), >100-µg/ft2 for interior windowsills and >400-µg/ft^2 for window troughs and all other exterior surfaces, are defined as LBP hazards.

DISCLAIMER & STANDARD OF CARE

Although paint on various surfaces may not contain lead in concentrations that exceed the federal standard, a hazard could be presented if painted surfaces are disturbed. Occupational Safety and Health Administration (OSHA) regulations covering worker safety and health may apply when painted surfaces, lead-based paint or not, are disturbed The EPA pre-renovation rule requires that the contractor provide a copy of the booklet Protect Your Family from Lead in Your Home or Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools for any renovation that disturbs more than 2-square feet (2-ft2) of painted surface in a facility built before 1978. Furthermore, if renovation of any kind takes place the contractor should provide a copy of Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools. This Report was generated utilizing the EPA protocol referenced in the Certification portion of this Report. The analytical results associated with this inspection are only applicable on the date(s) indicated. Future activities may alter the results.

OBSERVATIONS AND ANALYTICAL FINDINGS

LBP INSPECTION

The analytical data associated with this inspection **did not detect LBP** in various interior and exterior building components tested. Upon arrival, the building appeared vacant and the paints on most surfaces were observed intact, though the paint on the plaster walls and drywalls within the Machine Shop. In addition, the wooded slab floor in Room 3 on the second floor appeared dusty and deteriorated. The Machine Shop was occupied and in use at the time of this inspection. In addition, it was reported that the second floor was previous renovated, though Room 3 within the second floor was excluded from the renovation.

LBP SETTLED LEAD DUST SURVEY

To determine the extent of the LBP contamination, SLD survey was conducted throughout the interior floors of building. Subsequently, the lead dust concentrations detected within the Machine Shop on the first floor and the Room 3 on the second floor exceeded the EPA Lead Dust Action Level for target housing. The elevated surface lead dust concentrations detected within the Machine Shop of the building is mostly due to the painting or mechanical operations that previously occurred within the shop. The concentrations of surface dust within the Machine Shop and second Floor Room 3 are indicative of lead dust contamination. Lastly, the analytical data for the LBP inspection and SDS survey are included in the Appendix to this Report. The results for all the sampled locations and the concentrations detected are reported below in Table I.

TABLE I: SURFACE LEAD DUST ANALYTICAL SUMMARY

LAB ID	ROOM EQUIVALENT	BUILDING COMPONENT/LOCATION	RESULTS	ACTION LEVEL
001	FIRST FLOOR – ROOM 1	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
002	FIRST FLOOR – ROOM 2	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
003	FIRST FLOOR – ROOM 3	FLOOR - CENTER	6.7-µg/ft	10-µg/ft
004	FIRST FLOOR - ROOM 4	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
005	FIRST FLOOR – ROOM 5	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
006	FIRST FLOOR – ROOM 6	FLOOR – NORTH	<5.0-µg/ft	10-µg/ft
007	FIRST FLOOR – ROOM 7	FLOOR - EAST	<5.0-µg/ft	10-µg/ft
008	MACHINE SHOP	FLOOR – WEST SIDE	8.8-µg/ft	10-µg/ft
009	MACHINE SHOP	FLOOR – EAST SIDE	**27-µg/ft**	**10-µg/ft**
010	MACHINE SHOP OFFICE ROOM	FLOOR - CENTER	9.8-µg/ft	**10-µg/ft**
011	SECOND FLOOR – ROOM 1	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
012	SECOND FLOOR – ROOM 2	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
013	SECOND FLOOR – ROOM 3	FLOOR - CENTER	**110-µg/ft**	**10-µg/ft**
014	SECOND FLOOR – ROOM 4	FLOOR - CENTER	<5.0-µg/ft	10-µg/ft
			ESTIMATED LEAD SURFACE CLEAN-UP COST (2ND FLOOR ROOM 3 & MACHINE SHOP TOTAL SIZE: 3,570-FT²)	$5,000
			ESTIMATED CLEARANCE SAMPLING COST	$1,500
			ESTIMATED TOTAL COST	$6,500

µg/ft.² MICROGRAMS PER SQUARE FOOT

DISCLOSURE STATEMENT AND OWNERS LEGAL OBLIGATION

Under Federal law (24 CFR Part 35 and 40 CFR Part 745), this LBP Inspection Report must be disclosed and made available to prospective tenants before becoming obligated under a lease or sales contract where LBP is present. If an Inspection finds that LBP is not present in certain multifamily dwelling units, which are to be leased, the dwelling unit(s) is exempt from disclosure requirements. However, under federal law even if no LBP is identified the owner is still required to fulfill certain legal responsibilities when the property is sold, not leased. Property owners and sellers are also required to distribute an educational pamphlet and include standard warning language in their leases or sales contracts to ensure that information is provided in order to protect children from LBP hazards.

Information regarding the legal obligation to disclose results associated with LBP inspections and/or risk assessments to tenants and/or purchasers can be obtained from the National Lead Information Center Clearinghouse (1-800-424-LEAD). This information is specified in 24 CFR Part 35 and 40 CFR Part 745 (published in the *Federal Register*, Volume 61, Number 45, April 6, 1996, beginning on p. 9064).

LEAD-BASED PAINT INFORMATION

You may contact the National Lead Information Center Clearinghouse (1-800-424-LEAD) to obtain United States Department of Housing and Urban Development (HUD) and EPA brochures, question and answer booklets, regulations, mentioned in this Report, and other information regarding LBP disclosure.

PART I: IDENTIFYING INFORMATION

OCCUPANT INFORMATION

Vacant

PROPERTY OWNER INFORMATION

City of Luther, Oklahoma

CERTIFIED LBP INSPECTOR/RISK ASSESSOR

Eneojo Onuche
ODEQ Certification – OKRASR13853

CERTIFIED LBP FIRM

Marshall Environmental Management, Inc.
1301 N Martin Luther King Ave.
Oklahoma City, OK 73117
405.616.0401| mem@marshallenvironmental.com
ODEQ Certification – OKFIRM11160

LABORATORY ANALYSES PERFORMED BY:

Quantem Laboratories
2033 Heritage Park Drive
Oklahoma City, OK 73120-7502
800.822.1650 | www.quantem.com

LABORATORY ANALYSES PERFORMED BY:

Environmental Testing, Incorporated
4619 N Santa Fe Avenue
Oklahoma City, OK 73118
Phone: 405.488.2400|www.etilab.com

X-RAY FLUORESCE ANALYZER

Heuresis Pb200i Lead Analyzer
Serial Number: Q8-131

APPENDIX

XRF ANALYTICAL DATA

AREA DIAGRAM & PHOTO ALBUM

CERTIFICATION/LICENSURE

FORMER LUTHER TOWN HALL
119 SOUTH MAIN STREET
LUTHER OK 73054

MARSHALL ENVIRONMENTAL MANAGEMENT INC.
1301 NORTH MARTIN LUTHER KING AVENUE
OKLAHOMA CITY OK 73117

EQUIPMENT
Type XRF Lead Paint Analyzer
Serial Num. 1966
App Version Pb200i-4.1-11

Job Id	Reading #	Concentration	Units	Result	Date	Room	Structure	Substrate	Wall	Color	Condition
0010-EN-010820-JO	747	1	mg/cm2	Positive	2/19/2020	Calibrate					
0010-EN-010820-JO	748	0	mg/cm2	Positive	2/19/2020	Calibrate					
0010-EN-010820-JO	749	0.1	mg/cm2	Positive	2/19/2020	Calibrate					
0010-EN-010820-JO	750	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Wall	Wood	A	Beige	Intact
0010-EN-010820-JO	751	0.4	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Wall	Wood	B	Beige	Intact
0010-EN-010820-JO	752	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Wall	Wood	C	Beige	Intact
0010-EN-010820-JO	753	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Wall	Wood	D	Beige	Intact
0010-EN-010820-JO	754	-0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Ceiling	Drywall		White	Intact
0010-EN-010820-JO	755	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Window Frame	Wood	B	Brown	Intact
0010-EN-010820-JO	756	-0.2	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Baseboard	Wood	B	Brown	Intact
0010-EN-010820-JO	757	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Door	Wood	B	Brown	Intact
0010-EN-010820-JO	758	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Door Frame	Wood	B	Brown	Intact
0010-EN-010820-JO	759	0	mg/cm2	Negative	2/19/2020	1st Floor Room 1	Wall	Wood	A	Beige	Intact
0010-EN-010820-JO	760	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Wall	Wood	B	Beige	Intact
0010-EN-010820-JO	761	0	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Wall	Wood	C	Beige	Intact
0010-EN-010820-JO	762	0	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Wall	Wood	D	Beige	Intact
0010-EN-010820-JO	763	-0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Ceiling	Drywall		White	Intact
0010-EN-010820-JO	764	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Door Frame	Wood	C	Brown	Intact
0010-EN-010820-JO	765	-0.4	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Door Trim	Wood	C	White	Intact
0010-EN-010820-JO	766	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Door	Wood	D	Brown	Intact
0010-EN-010820-JO	767	0	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Baseboard	Wood	D	Brown	Intact
0010-EN-010820-JO	768	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 2	Cabinet	Metal	B	Black	Intact
0010-EN-010820-JO	769	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Wall	Wood	A	Beige	Intact
0010-EN-010820-JO	770	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Wall	Wood	B	Beige	Intact
0010-EN-010820-JO	771	0	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Wall	Wood	C	Beige	Intact
0010-EN-010820-JO	772	0	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Wall	Wood	D	Beige	Intact
0010-EN-010820-JO	773	0	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Ceiling	Drywall		White	Intact
0010-EN-010820-JO	774	-0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Baseboard	Wood	B	White	Intact
0010-EN-010820-JO	775	0	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Door	Wood	C	Brown	Intact
0010-EN-010820-JO	776	0.7	mg/cm2	Negative	2/19/2020	1st Floor Room 3	Door Trim	Wood	C	White	Intact
0010-EN-010820-JO	777	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 4	Wall	Wood	B	Beige	Intact
0010-EN-010820-JO	778	0	mg/cm2	Negative	2/19/2020	1st Floor Room 4	Wall	Wood	D	Beige	Intact

0010-EN-010820-JO	779	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 4	Ceiling	Drywall		White	Intact
0010-EN-010820-JO	780	0	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Wall	Drywall	A	Beige	Intact
0010-EN-010820-JO	781	0	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Wall	Drywall	B	Beige	Intact
0010-EN-010820-JO	782	-0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Wall	Drywall	C	Beige	Intact
0010-EN-010820-JO	783	-0.3	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Wall	Drywall	D	Beige	Intact
0010-EN-010820-JO	784	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Ceiling	Drywall		Beige	Intact
0010-EN-010820-JO	785	-0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 5	Door	Wood	D	Brown	Intact
0010-EN-010820-JO	786	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 6	Wall	Wood	A	Brown	Intact
0010-EN-010820-JO	787	0	mg/cm2	Negative	2/19/2020	1st Floor Room 6	Wall	Wood	C	Brown	Intact
0010-EN-010820-JO	788	0.1	mg/cm2	Negative	2/19/2020	1st Floor Room 6	Wall	Wood	D	Brown	Intact
0010-EN-010820-JO	789	0	mg/cm2	Negative	2/19/2020	1st Floor Room 7	Wall	Wood	A	Brown	Intact
0010-EN-010820-JO	790	0	mg/cm2	Negative	2/19/2020	1st Floor Room 7	Wall	Wood	B	Brown	Intact
0010-EN-010820-JO	791	-0.2	mg/cm2	Negative	2/19/2020	1st Floor Room 7	Wall	Wood	D	Brown	Intact
0010-EN-010820-JO	792	-0.3	mg/cm2	Negative	2/19/2020	1st Floor Room 7	Door	Wood	D	Brown	Intact
0010-EN-010820-JO	793	-0.2	mg/cm2	Negative	2/19/2020	1st Floor Room 7	Court Seats	Wood	C	Beige	Intact
0010-EN-010820-JO	794	-0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 1	Wall	Wood	A	Brown	Intact
0010-EN-010820-JO	795	0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 1	Wall	Wood	C	Brown	Intact
0010-EN-010820-JO	796	-0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 1	Ceiling	Drywall		White	Intact
0010-EN-010820-JO	797	0	mg/cm2	Negative	2/19/2020	2nd Floor Room 1	Cabinet	Wood	C	Brown	Intact
0010-EN-010820-JO	798	0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 1	Door	Wood	D	Brown	Intact
0010-EN-010820-JO	799	0	mg/cm2	Negative	2/19/2020	2nd Floor Room 2	Wall	Drywall	A	Beige	Intact
0010-EN-010820-JO	800	0	mg/cm2	Negative	2/19/2020	2nd Floor Room 2	Wall	Drywall	C	Beige	Intact
0010-EN-010820-JO	801	0	mg/cm2	Negative	2/19/2020	2nd Floor Room 2	Wall	Drywall	D	Beige	Intact
0010-EN-010820-JO	802	0.2	mg/cm2	Negative	2/19/2020	2nd Floor Room 2	Ceiling	Drywall		Beige	Intact
0010-EN-010820-JO	803	0.2	mg/cm2	Negative	2/19/2020	2nd Floor Room 2	Door	Wood	D	Brown	Intact
0010-EN-010820-JO	804	-0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 3	Window Frame	Metal	D	Beige	Intact
0010-EN-010820-JO	805	-0.1	mg/cm2	Negative	2/19/2020	Exterior	Wall	Brick	A	White	Intact
0010-EN-010820-JO	806	-0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 4	Wall	Drywall	A	Beige	Intact
0010-EN-010820-JO	807	-0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 4	Wall	Drywall	B	Beige	Intact
0010-EN-010820-JO	808	0.3	mg/cm2	Negative	2/19/2020	2nd Floor Room 4	Wall	Drywall	D	Beige	Intact
0010-EN-010820-JO	809	0.1	mg/cm2	Negative	2/19/2020	2nd Floor Room 4	Ceiling	Drywall		Beige	Intact
0010-EN-010820-JO	810	0	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Plaster	D	Green	Intact
0010-EN-010820-JO	811	0	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Plaster	B	Green	Intact
0010-EN-010820-JO	812	0.1	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Wood	C	White	Intact
0010-EN-010820-JO	813	0	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Drywall	A	White	Intact
0010-EN-010820-JO	814	0	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Drywall	B	White	Intact
0010-EN-010820-JO	815	-0.1	mg/cm2	Negative	2/19/2020	Machine Shop	Wall	Drywall	D	White	Intact
0010-EN-010820-JO	816	0	mg/cm2	Negative	2/19/2020	Machine Shop	Door	Wood	A	White	Intact
0010-EN-010820-JO	817	0.3	mg/cm2	Negative	2/19/2020	Machine Shop	Door Trim	Wood	A	White	Intact
0010-EN-010820-JO	818	0.2	mg/cm2	Negative	2/19/2020	Exterior	Garage Door	Metal	C	White	Intact
0010-EN-010820-JO	819	0.2	mg/cm2	Negative	2/19/2020	Exterior	Garage door Frame	Metal	C	White	Intact
0010-EN-010820-JO	820	0.2	mg/cm2	Negative	2/19/2020	Exterior	Wall	Brick	A	White	Deteriorated

0010-EN-010820-JO	821	1	mg/cm2	Positive	2/19/2020	Calibrate
0010-EN-010820-JO	822	1	mg/cm2	Positive	2/19/2020	Calibrate
0010-EN-010820-JO	824	1	mg/cm2	Positive	2/19/2020	Calibrate

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

Environmental Chemistry Analysis Report

QuanTEM Set ID: 320131
Date Received: 02/20/20
Received By: Christiana Younge
Date Sampled:
Time Sampled:
Analyst: CR
Date of Report: 02/26/20

AIHA-LAP, LLC: 101352

Client: Marshall Environmental Management, Inc.
1301 N. MLK Ave
Oklahoma City, OK 73117

Acct. No.: A331

Project: 0010-EN-010820-JO
Location: N/A
Project No.: N/A

QuanTEM ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
001	Floor 1 Room 1	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
002	Floor 1 Room 2	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
003	Floor 1 Room 3	Wipe	Lead	6.7	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
004	Floor 1 Room 4	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
005	Floor 1 Room 5	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
006	Floor 1 Room 6	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
007	Floor 1 Room 7	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
008	Machine Shop West	Wipe	Lead	8.8	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
009	Machine Shop East	Wipe	Lead	27	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082

Note: Sample results have not been corrected for blank values.

This report applies only to the standards or procedures indicated and to the specific samples tested. It is not indicative of the qualities of apparently identical or similar products or procedures, nor does it represent an ongoing assurance program unless so noted. These reports are for the exclusive use of the client and are not to be reproduced without specific written permission. QuanTEM is not responsible for user-supplied data used in calculations. Customer provided data such as volumes, areas, etc., cannot be verified by QuanTEM Laboratories, LLC.

Unless otherwise noted, upon receipt the condition of the sample was acceptable for analysis.

Wipe materials must meet ASTM E1792 criteria. Method detection limits and resultant reporting limits may not be valid for non-ASTM E1792 wipe material.

EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

Environmental Chemistry Analysis Report

QuanTEM Set ID: 320131
Date Received: 02/20/20
Received By: Christiana Younge
Date Sampled:
Time Sampled:
Analyst: CR
Date of Report: 02/26/20

AIHA-LAP, LLC: 101352

Client: Marshall Environmental Management, Inc.
1301 N. MLK Ave
Oklahoma City, OK 73117

Acct. No.: A331

Project: 0010-EN-010820-JO
Location: N/A
Project No.: N/A

QuanTEM ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
010	Machine Shop Office	Wipe	Lead	9.8	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
011	Floor 2 Room 1	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
012	Floor 2 Room 2	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
013	Floor 2 Room 3	Wipe	Lead	110	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082
014	Floor 2 Room 4	Wipe	Lead	<5.0	5	ug/sq. Ft.	02/26/20 11:44	NIOSH 7082

Authorized Signature: _____
Cherry Rossen, Technical Manager

Note: Sample results have not been corrected for blank values.

This report applies only to the standards or procedures indicated and to the specific samples tested. It is not indicative of the qualities of apparently identical or similar products or procedures, nor does it represent an ongoing assurance program unless so noted. These reports are for the exclusive use of the client and are not to be reproduced without specific written permission. QuanTEM is not responsible for user-supplied data used in calculations. Customer provided data such as volumes, areas, etc., cannot be verified by QuanTEM Laboratories, LLC.

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EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified

Supplemental Report
QAQC Results

QA ID: 18328
Test: Lead
Date: 2/26/2020
Matrix: Wipe
Lab Number: 320131
Approved By: Cherry Rossen
Date Approved: 2/26/2020

Notes:

Blank Data:

Type of Blank	Blank Value
FCB	0
ICB	0
Matrix Blank	0

Standards Data:

Standard	Low Limit	Obtained	High Limit
CCV	4.5	5	5.5
FCV	4.5	4.8	5.5
ICV	0.9	1.1	1.1
RLVS	0.05	0.11	0.15

Duplicate Data:

Recovery Data:

Sample Number	Result	Spike Level	Result + Spike	% Recovery	Dup. Result + Spike	% Dup. Recovery	% Spike RPD
MS-W1	0.000	2.431	2.567	105.6	2.474	101.8	3.7

Authorized Signature: _____

Cherry Rossen, Technical Manager

LEAD CHAIN OF CUSTODY

QUANTEM LABORATORIES
www.QuanTEM.com
2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only
Lab No. 320131
(Accept) Reject

Report Results (☑ one box)	
	QuanTEM Website
	Other _____

Contact Information		Project Information	
Company: Marshall Environmental Management	Phone: 405-616-0401	Project Name: 0010-EN-610820-30	
Contact: Jamie Marshall	Cell Phone:	Project Location:	
Account #:	E-mail:	Project ID:	

Sampled By:	Name: Jacob Bartels	Date: 2/19/2020

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
	2/19/2020		Christiana Youngs	2-19-2020 15:30

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

No.	Sample ID (10 Characters Max)	Sample Description	Volume (Liters)	Volume Area (Length x Width)	Sample Matrix (see matrix code box)	Analysis: Pb	Units (☑ ONE box only): PPM	Wt %	mg / l	µg /ft²	µg / m³	mg / cm²
1	Floor1 room1	Room 1 Floor - center	N/A	1x1 ft	C	X				X		
2	room2	Room 2 Floor - Center	↓	↓	↓	↓				↓		
3	room3	Room 3 Floor - Center										
4	room4	Room 4 Floor - Center										
5	room5	Room 5 Floor - center										
6	room6	Room 6 Floor - North										
7	room7	Room 7 Floor - East										
8	Machine Shop west	Machine Shop Floor - west										
9	East	Machine Shop Floor - East										
10	Office	Machine Shop Floor - office										
11	Floor2 room1	Floor2 - room1 Floor - Center										
12	room2	Floor2 - room2 Floor - Center	↓	↓	↓	↓				↓		

Sample Matrix Codes	
A	Soil
B	Paint Chips
C	Surface / Dust Wipes
D	Bulk Miscellaneous
E	Air Cassette

TURNAROUND TIME	
	Same Day
	24 - Hour
	3 - Day
X	5 - Day

SATURDAY SAMPLE DELIVERY - CALL TO SCHEDULE • Use this address for Saturday Delivery only: 4220 N. Santa Fe Ave., Oklahoma City, OK 73105-8517 • Mark Package "Hold for Saturday Pickup"

LEAD CHAIN OF CUSTODY

QUANTEM LABORATORIES
www.QuanTEM.com
2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only
Lab No. 320131
Accept Reject

Project Information

Company: Marshall Environmental Management | Project Name: 0010 - EN - 010820 - JO | Project Location:

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

No.	Sample ID (10 Characters Max)	Sample Description	Volume (Liters)	Volume Area (Length x Width)	Sample Matrix (see matrix code box)	Analysis: Pb	Analysis:	Analysis:	Units (☑ ONE box only): PPM	Wt %	mg / l	µg / ft²	µg / m³	mg / cm²
13	Floor 2 room 3	Floor 2 - room 4 floor - center	N/A	1 x 1 ft	C	X						X		
14	Floor 2 room 4	Floor 2 - room 4 floor - center	N/A	1 x 1 ft	C	X						X		
15														
16														
17														
18														
19														
20														
21														
22														
23														
24														
25														
26														
27														
28														
29														
30														

Sample Matrix Codes	
A	Soil
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E	Air Cassette

SATURDAY SAMPLE DELIVERY - CALL TO SCHEDULE • Use this address for Saturday Delivery only: 4220 N. Santa Fe Ave., Oklahoma City, OK 73105-8517 • Mark Package "Hold for Saturday Pickup"

N

ROOM 1

ROOM 2

1 - FLOOR 1 ROOM 1

2 - FLOOR 1 ROOM 2

Bathroom
1 East

Room 3

3 - FLOOR 1 ROOM 3

ROOM 4

Closet

4 - FLOOR 1 ROOM 4

6 - FLOOR 1 ROOM 6

ROOM 5

Bathroom 2 - West

ROOM 6

5 - FLOOR 1 ROOM 5

ROOM 7

7 - FLOOR 1 ROOM 7

UP

10 - MACHINE SHOP OFFICE

Machine Shop
Office

MACHINE SHOP

8 - MACHINE SHOP WEST

9 - MACHINE SHOP EAST

MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT

FIRST FLOOR – SETTLED LEAD DUST WIPE SAMPLE LOCATIONS

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

1
FIGURE

N

ROOM 1

ROOM 2

Bathroom
1 East

Room 3

ROOM 4

Closet

ROOM 5

Bathroom 2 - West

ROOM 6

ROOM 7

UP

MACHINE SHOP

Machine Shop
Office

Surface lead-dust contamination location

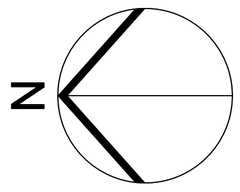
MAP IS NOT TO SCALE

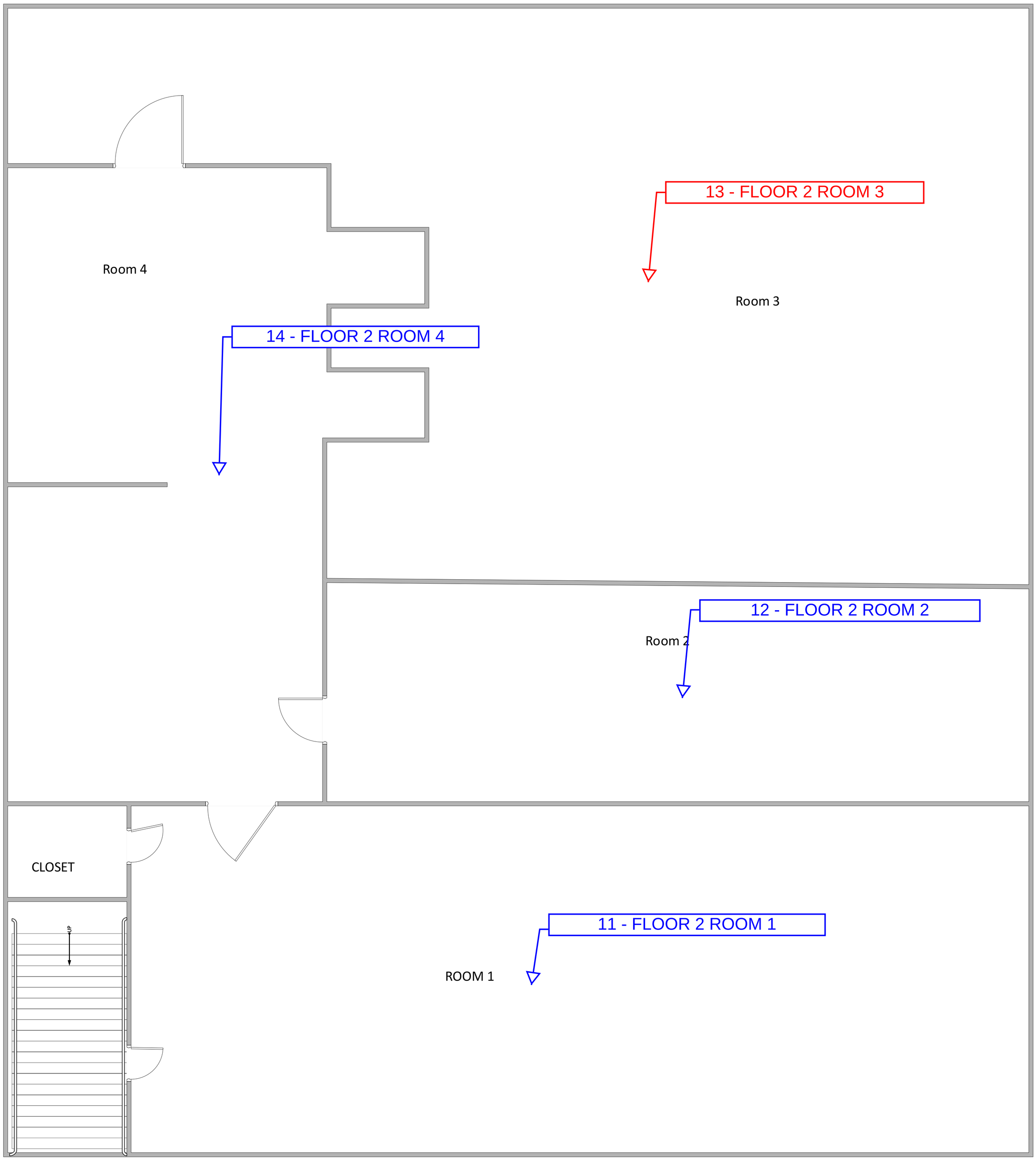
MARSHALL ENVIRONMENTAL MANAGEMENT

FIRST FLOOR – LEAD DUST CONTAMINATION LOCATION

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

2
FIGURE





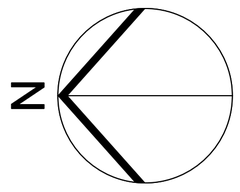
MAP IS NOT TO SCALE

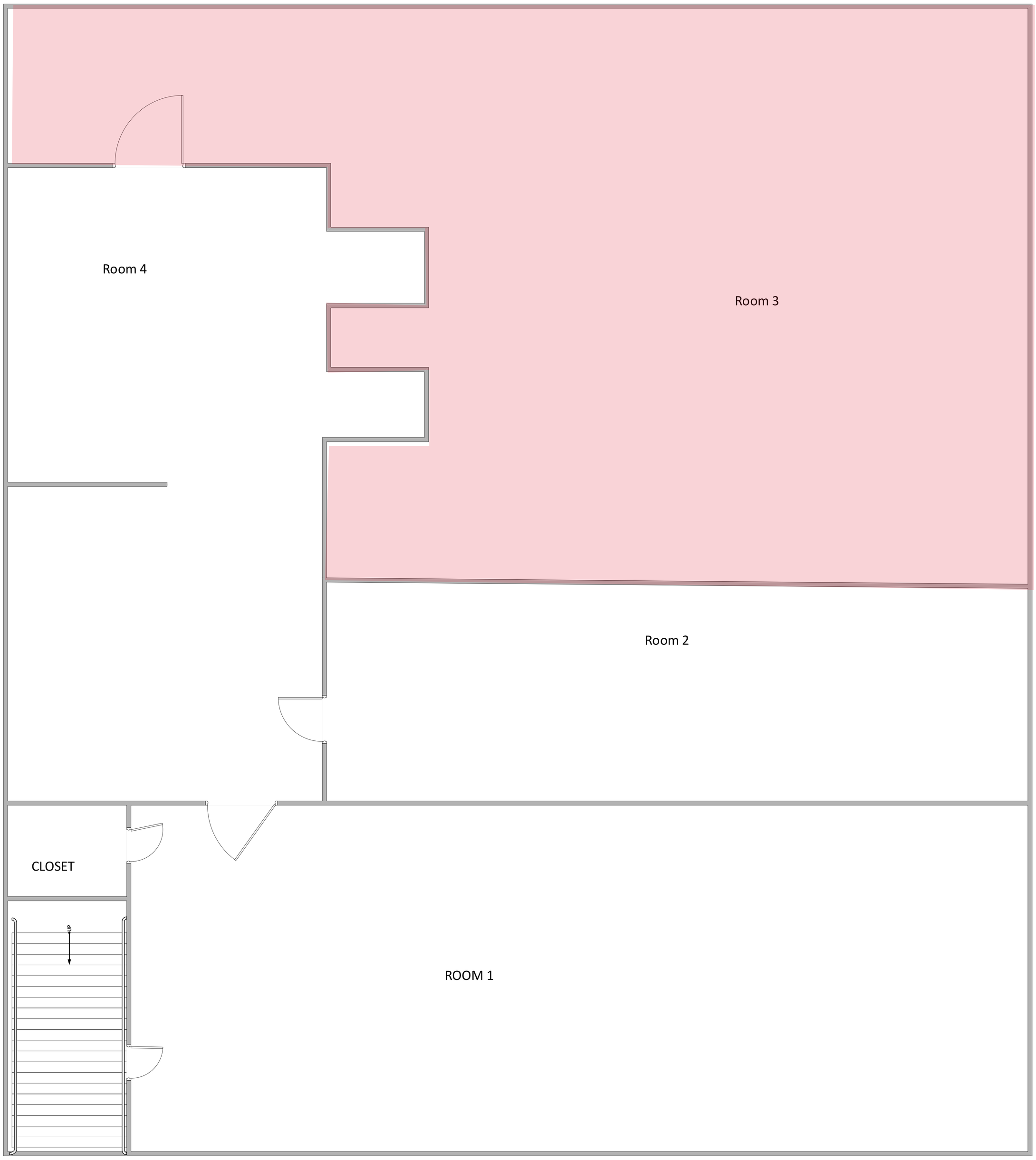
MARSHALL ENVIRONMENTAL MANAGEMENT

SECOND FLOOR -SETTLED LEAD DUST WIPE SAMPLE LOCATIONS

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

3
FIGURE





Surface lead-dust contamination location

MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT

SECOND FLOOR – LEAD-DUST CONTAMINATION LOCATION

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

4
FIGURE

Scope of Work

STATEMENT OF WORK
For
Remediation of Lead and Asbestos Contamination at The Former Luther Town Hall

The Oklahoma Department of Environmental Quality (DEQ) is requesting a work plan and cost estimate for remediation services at the Former Luther Town Hall located in Luther, Oklahoma. This statement of work (SOW) describes the remediation of lead contaminated dust and removal and proper disposal of asbestos-containing material (ACM). This work shall be performed to provide for safe re-use of the facility. A mandatory pre-bid site visit and walk through will be held at the site to give a better understanding of the project. The site assessments and project design are attached (**Attachments 1-3**).

The building is located at 119 S. Main Street, Luther, Oklahoma 73054. The building will have available water and electricity to use during remediation.

SPECIAL PROVISIONS:

1. Work Schedule: The contractor shall schedule all work to be completed within 60 calendar days after date of the written "Notice to Proceed." Coordination of work shall be scheduled with DEQ.
    a. A pre-construction meeting shall be held at the site after the Notice to Proceed date to review Statement of Work and answer any questions the contractor may have.
    b. All on-site work shall be completed by the contractor five (5) days prior to the scheduled contract completion date, with the remaining five (5) days utilized for final inspection and correction of all deficiencies.

2. Conditions of Work: The following conditions of work will apply in accomplishment of this contract:
    a. All work shall be performed in accordance with all applicable State and Federal regulations.
    b. Contractor shall not cause damage to building structures, property, walls, and fixtures during remediation/abatement process. If damage is caused to these items, contractor is responsible for repairing the damage at no cost to DEQ.
    c. Coordination of work areas shall be scheduled with DEQ.
    d. All work shall be performed in such a manner that it does not put workers' health and safety at risk. Contractor shall develop and maintain a Health and Safety Plan (HASP) and follow all applicable OSHA and ODOL safety regulations.
    e. Disposal of Removed Materials: All materials removed by the Contractor under this contract shall be disposed of in accordance with State and Federal regulations. DEQ will sign as generator, if necessary.

CONTRACTOR SHALL:

- Attend mandatory pre-bid meeting and site walk through;
- Follow all appropriate OSHA requirements;
- Follow OSHA Lead in Construction Interim Final Standard (29 CFR 1926.62) for lead-based paint abatement and lead dust remediation.

Submit With Bid:

- Copy of ODOL Asbestos Abatement Contractor License;
- Three references with name, type of project, phone number, and location of similar work in the last three years;

Submit After Notice to Proceed:

- A Work Plan with planned activities and schedule to DEQ for approval;

SEQUENCE OF EVENTS

1) Any debris and/or furniture left in the rooms where asbestos abatement is occurring shall be removed and discarded.
2) The asbestos abatement shall be completed;
3) DEQ shall be contacted to confirm all ACM has been appropriately removed and ODOL shall be contacted to perform final inspection;
4) Room 3 of the second floor shall be cleaned to remediate lead dust;
5) DEQ's Consultant shall be contacted to perform confirmation sampling to confirm floors and surfaces have been appropriately remediated.

ASBESTOS ABATEMENT INSTRUCTIONS

- Non-friable and/or non-regulated Asbestos Containing Material (ACM) shall be removed as described in the instructions listed below. For more details see the attached Former Luther Town Hall Asbestos Inspection Report with floor plan map showing locations of non-friable ACM (**Attachment 1**).
    - Remove floor tile from the NE corner of first floor Room 3 as seen in Attachment 2.
        - Approximately 24 ft^2 of floor tile shall be removed.

- Friable asbestos shall be removed as described in the attached approved asbestos Project Design (**Attachment 2**).
    - Remove and properly dispose of asbestos containing ceiling texture and joint compound located on the 1st Floor, Rooms 1-7. See the Project Design provided.
        - A total of 1320 ft^2 of ceiling texture and joint compound shall be removed.

- Once Asbestos Abatement is complete, ODOL shall be contacted to perform final inspection and DEQ shall be contacted to confirm abatement has been appropriately performed.

LEAD DUST REMEDIATION INSTRUCTIONS

Lead Dust Remediation (See Attachment 3)

- Room 3 of the second floor requires lead dust remediation;
    - Surfaces above the floors such as walls and shelves may have accumulated dust that has settled. This accumulation shall be removed prior to the cleaning of the floors. This shall be done to prevent recontamination of the floors after they are cleaned.
        - Dispose of any materials, determined by the DEQ to be trash, as non-hazardous waste;
        - HEPA vacuum and wet wash floors of the second floor Room 3 where lead levels were found to be elevated.
    - Lead levels on the floor of these rooms are elevated and lead contaminated dust may be ground into the pores and cracks of the concrete and wood. It may be necessary to clean floors several times or use alternate cleaning methods after HEPA vacuuming and wet washing to remove the lead dust from the floors and get the lead levels down to 10 micrograms per square foot (µg/SF).
    - Contact DEQ's consultant to perform post remediation wipe sampling to confirm that room floors with lead contamination have been appropriately remediated to 10 µg/SF.
    - Areas above 10 µg/SF shall be re-cleaned and re-tested until results are at or below 10 µg/SF.
- If the wipe samples after the initial floor cleaning show that lead levels are still above 10 µg/SF, DEQ may decide to seal the floors rather than continue attempting to vacuum and wet wash.
    - If the floors of Room 3 cannot be cleaned to 10 µg/SF, a sealant designed for wood shall be applied to surfaces according to manufactures specifications.
        - Use KM-669 Acrylic Sealer or equivalent (**Attachment 4**)..
    - Areas above 10 µg/SF shall be cleaned to remove lead dust from sealed surface. Once cleaned, the area shall be retested to confirm the area has been remediated to 10 µg/SF.

Disposal of Materials

Hazardous Waste

- Wash water filters shall be disposed of as hazardous waste.

Other

- Lead dust and appropriate cleaning materials from cleaning of rooms shall be disposed of as appropriate.
- Wash Water Disposal

    - All wash water from the building shall be filtered through a 1 micron filter and stored on site in containers;
    - The wash water will be sampled for total lead and total phosphorus; Total lead shall be run by ICP and total phosphorus shall be run by EPA Method 365.3;
    - Wash water shall be disposed of appropriately.
    - Sample results and disposal documentation shall be submitted to DEQ
- Poly sheeting shall be disposed of as appropriate. If contractor plans to dispose of as non-hazardous waste, best management practices such as vacuuming, washing, wiping down, or cleaning poly sheeting prior to disposal shall be implemented.
- Mop heads, towels, brushes, wipes, and other cleaning supplies shall be disposed as appropriate.
- Personal protective equipment (gloves, Tyvek, face masks, etc.) shall be disposed as appropriate.

Confirmation and Clearance Sampling

- Contractor may use his own lab to check progress of remediation, however all DEQ decisions shall be based on analytical data from samples taken by DEQ or DEQ consultant.
- All post remediation sampling will be performed after all initial abatement, remediation, and cleaning are complete.
- All lead wipe samples shall be at or below 10 µg/SF in order for these areas to be considered clean.

FINAL REPORT

- Write final report and submit to DEQ;

- Final report shall include:
    - A detailed summary of work including any warranties and data;
    - Copy of post remediation sampling report;
    - Waste manifests (if any); and
    - Photo documentation of work
        - Photo documentation of work will have color digital photos with captions describing photo;

- Final report will be submitted electronically.

OWNER REPRESTATIVE

Owner's Representative: Katrina Pollard
Oklahoma Department of Environmental Quality
Land Protection Division
707 N. Robinson
P.O. Box 1677
Oklahoma City, OK 73101-1677

Phone Numbers:
(405) 702-5112(Office)
(405) 702-5101 (Fax)
E-Mail: katrina.pollard@deq.ok.gov

CITY OF LUTHER
FORMER TOWNHALL

119 SOUTH MAIN STREET
LUTHER, OK 73054

JUNE 8, 2020	*ASBESTOS PROJECT DESIGN*

Prepared For:

ODEQ Land Protection Division
Attention: Alisha Grayson | Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alisha.grayson@deq.ok.gov

Prepared By:

Marshall Environmental Management, Incorporated
Attention: Jamie Marshall, President
1301 North Martin Luther King Avenue
Oklahoma City, Oklahoma 73117
405.616.0401 | mem@marshallenvironmental.com

TABLE OF CONTENTS

FORMER CITY OF LUTHER TOWNHALL

ASBESTOS PROJECT DESIGN

SCOPE OF WORK

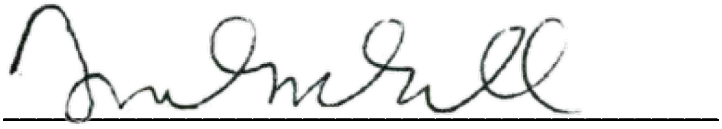
This Asbestos Project Design has been prepared to allow for the safe and economical removal of 1,320-square feet (ft^2) of ceiling texture/joint compounds throughout the first floor and approximately 24 ft^2 of floor tiles within Room 3 of the first floor of the Former City of Luther Townhall building located at 119 South Main Street in Luther, Oklahoma. Asbestos removal will be conducted in accordance with Oklahoma Asbestos Control (OAC) Act 380:50-23-4, ceiling texturing procedures.

RESPONSIBLE PARTIES & CONSULTANTS

LICENSED ASBESTOS ABATEMENT CONTRACTOR:

TBD

LICENSED ASBESTOS PROJECT DESIGNER:



Jamie Marshall, MS, CIH - President
Marshall Environmental Management, Inc.
1301 North Martin Luther King Avenue
Oklahoma City, Oklahoma 73117
405.616.0401 | mem@marshallenvironmental.com

OWNER REPRESENTATIVE:

ODEQ Land Protection Division
Attention: Alisha Grayson | Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alsiha.grayson@deq.ok.gov

AGENCY STATEMENT

For the duration of this abatement project all local, state and federal regulations will apply. The regulations include, but are not limited to, the OAC Act, Abatement of Friable Asbestos Materials Rules 380:50-1-1 through 380:50-29-1.

SEQUENCING OF WORK, QUANTITY, TYPE & PERCENTAGE OF RACM

The abatement project will consist of one phase. The Licensed Asbestos Abatement Contractor shall file the notification of the intended start date based upon the schedule to be determined by the Owner. The abatement project duration is estimated to take approximately one (1) week to complete. Listed below is the location of the Regulated Asbestos-Containing Material (RACM) to be abated, including total quantity, type of material and percentage of asbestos as a result of polarized light microscopy (PLM) or point count testing. The sequencing of the abatement will be at the discretion of the abatement contractor, with approval from the owner and project design representative:

1) OAC Act 380:50-23-4, Ceiling Texture Procedures
    - Work Area 1:
        i. ~1,320-Ft^2 of ceiling texture and joint compound throughout the first floor of the building (2% Chrysotile)

EGRESS, EMERGENCY ESCAPE ROUTES & FIRE EXTINGUISHER PLACEMENT

The abatement work area will be clearly illuminated by droplights, light stands or equivalent lighting. Emergency lights will be in place where necessary, in all areas that are not properly illuminated to assist in the identification of the exit locations. Power to the area is to be supplied by the ground-fault circuit interrupter (GFCI) power source. All work will be performed using a buddy system. Exit routes from the containment work area will be clearly marked with signs and highly visible arrows designating the exit path.

Fire extinguishers shall meet the requirements of the OAC Act 380:50-15-14. A minimum of 1 A:B:C fire extinguisher shall be provided for each 3,000-ft^2 of the work area, or major fraction thereof travel distance from any point of the work area to the nearest fire. A minimum of two (2) fire extinguishers will be inside the work area. Additionally, a minimum of 1 fire extinguisher shall be placed in the clean room of the decontamination facility.

Prior to beginning the prep and abatement work, all licensed asbestos workers will be given a briefing on the emergency egress procedures by the asbestos supervisor.

DETAILS OF ABATEMENT PROJECT

Asbestos removal will be conducted in accordance with OAC Act 380:50-23-4, ceiling texture procedure abatement standards. Oklahoma Department of Labor (ODOL) and Oklahoma Department of Environmental Quality (ODEQ) National Emission Standards for Hazardous Air Pollutants (NESHAP) notices must be filed with the appropriate agencies for this Asbestos Project Design. Copies of the notifications are to be provided to the Project Designer and Owner Representative. The licensed Asbestos Abatement Contractor will mobilize to begin prep work based upon the notice to proceed and after coordination is confirmed with the Owner Representative. Moving of the containments will require that a written project design amendment be submitted to the ODOL. Following the completion of the project, all required project documents and waste manifests must be submitted to the ODOL and provided to the Project Design Representative.

The initial job site setup shall include the establishment of GFCIs for use with all portable electric equipment, lighting and the power used by the decontamination unit equipment, high efficiency particulate air (HEPA) vacuums and negative air machines. Electrical within the containment or work areas will be locked out and tagged out prior to any workers coming within arm's reach of any energized electric or systems prior to the commencement of prep

work. The contractor will prep all asbestos waste dumpsters in accordance with section 380:50-17-9 of the OAC Act. The following sequencing of events shall be used for each specified method:

WORK AREA 1: CEILING TEXTURE/JOINT COMPOUND

1) Due to the occupied space, an ***attached decontamination*** unit that will be utilized and constructed in accordance with Subchapter 15 of the OAC Act 380:50-15-7, 15-8 and 15-12 and will be set up as soon as feasible for use in the work areas.
2) During prep, critical barriers must be erected with a single layer of 6-mil poly covering the floors in compliance with the requirements of Section 380:50-23-4 of these Rules.
3) Within the work area, there will **one containment with 1 externally vented negative pressure air machine. The negative pressure machine will be functioning** at 1,200 cubic feet per minute (cfm) to provide a minimum of ***2 air exchanges per hour***. A manometer will not be required onsite and visual negative pressure at the entry flaps is sufficient for this project.
4) When prep is completed, scheduling of an ODOL Prep Inspection will occur.
5) Once the Prep Inspection is approved, the contractor may begin removal. Only asbestos workers wearing the appropriate PPE will be allowed within the asbestos barrier tape.
6) During the abatement process, asbestos containing materials will be continuously wetted down until asbestos removal is complete. Any water escaping from the work area shall be considered to have created a breach of containment.
7) After completion of the final cleaning, the contractor may apply lockdown sealant where applicable and 3rd party clearance air monitoring may be conducted.
8) Conduct a final inspection to verify the completion of the Scope of Work with the Project Design Representative.
9) Lastly, schedule an ODOL Final Inspection.
10) Tear down any prep work and demobilize after approval by the ODOL and Project Design Representative

AIR MONITORING REQUIREMENTS

Air monitoring samples will be collected and analyzed by a technician that is National Institute for Occupational Safety and Health (NIOSH) 582e-trained. The air monitoring samples will be collected in accordance with NIOSH 7400 method for the duration of the workday. Air monitoring samples will be analyzed by Phase Contrast Microscopy (PCM), in conjunction with a laboratory proficient with the American Industrial Hygiene Association's (AIHA's) Proficiency in Analytical Testing (PAT) Program.

PREP MONITORING

Pre-abatement air monitoring will not be required on this project.

ABATEMENT MONITORING

PERSONAL AIR MONITORING

- A minimum of two or 25% (whichever is greater) of the workers will be monitored during the abatement activities. Personal monitoring is required during abatement to assure adequate respirator protection factors are applied in respirator selection.
- At least one, 30-minute excursion sample will be collected during the abatement of the RACM. The excursion sample is to be representative of the work conducted for each activity that may generate a potential for worker exposure in excess of the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) for the 30-minute excursion limit of 1.0-fiber per cubic centimeter (f/cc) as specified in OSHA'S Asbestos Standard for the Construction Industry (29 CFR 1926.1101).
- The contractor may use prior air monitoring for compliance with the requirement to collect an excursion sample if the representative sampling was conducted for work in the previous 12 months as specified in 29 CFR 1926.1101(f)(2)(iii)(B). ODOL has no excursion limit requirement; therefore, it is the contractor's responsibility to see that appropriate excursion sampling is conducted. This sampling work can be coordinated with the Industrial Hygiene (IH) technician provided by the Third-Party Air Monitoring firm.

AREA AIR MONITORING

In accordance with OAC:50-11-1-3, inside and outside air monitoring will be conducted during the asbestos abatement. Area air samples will be collected and analyzed as specified in the Air Monitoring Requirements section above. Listed below are the locations of the area samples to be collected during the asbestos abatement.

- Inside the work area
- Inside the loadout area (during load-out activities)
- Outside the Clean Room
- Outside the Containment (if adjacent area is occupied)
- Outside independent exit

CLEARANCE MONITORING

A minimum of Five (5) air samples will be collected within the work area containment for clearance purposes. The air samples will be collected with a minimum volume of 1,200 liters. The clearance air samples will be analyzed by PCM in conjunction with a laboratory that is currently proficient with the AIHA's PAT Program. Should clearance levels exceed the upper confidence level of 0.01-f/cc in accordance with OAC Act 380:50-11-2, the work area will be recleaned and clearance sampled will be recollected until clearance criteria is met.

GENERAL REQUIREMENTS

CODES & REGULATIONS

Wherever conflicts arise within the Project Design General Requirements or Procedures and/or among the applicable Rules and Regulations, the most stringent rules shall apply. This is subject to approval by ODOL or other authorities having jurisdiction (e.g. DEQ). If allowed by the authority with jurisdiction, a request for a variance can be submitted, provided it is acceptable to the Project Designer and Project Manager.

The Asbestos Abatement Contractor shall abide by this Project Design and the requirements, which govern friable asbestos removal in OAC Act 380:50, and require notification, worker training, and applicable transportation and disposal requirements for asbestos waste materials to include, but not limited to, the following:

- 29 CFR 1910, OSHA General Industry Standards
- 29 CFR 1926, OSHA Construction Industry Standard
- 29 CFR 1926, 1101 OSHA Asbestos Construction Standard
- 40 CFR 61, Subpart M (NESHAP) enforced by ODEQ
- ANSI Z88.2 latest edition (Respiratory Protection)
- Oklahoma Asbestos Control Act Title 40 Sections 450-456
- OAC 380:50 (All-inclusive), Oklahoma Rules for Abatement of Friable Asbestos Materials
- The Asbestos Hazard Emergency Response Act (AHERA) of 9186 PL (99-519) and rules and regulations adopted by EPA for its implementation, latest edition.
- 49 CFR (USDOT) Hazardous Material Transportation Regulations
- OAC 252:100-40, Air Pollution Control Rules, Control of Emission of Friable Asbestos during Demolition and Renovation Operations (replaces OAC 252:100-41-16)
- OAC 252:515-19, Management of Solid Wastes (DEQ Asbestos Land Protection Division Asbestos Disposal Requirements)
- All Applicable State Statutes, County and City Codes/Ordinances

SOIL SAMPLING

This project does not require the removal of any soils contaminated with RACM.

REQUEST FOR VARIANCES

None

APPENDIX

LABORATORY ANALYSIS

EXAMPLE CONTAINMENT DRAWING

ASBESTOS PROJECT DESIGNER LICENSE

Work Area Boundary

Escape Route

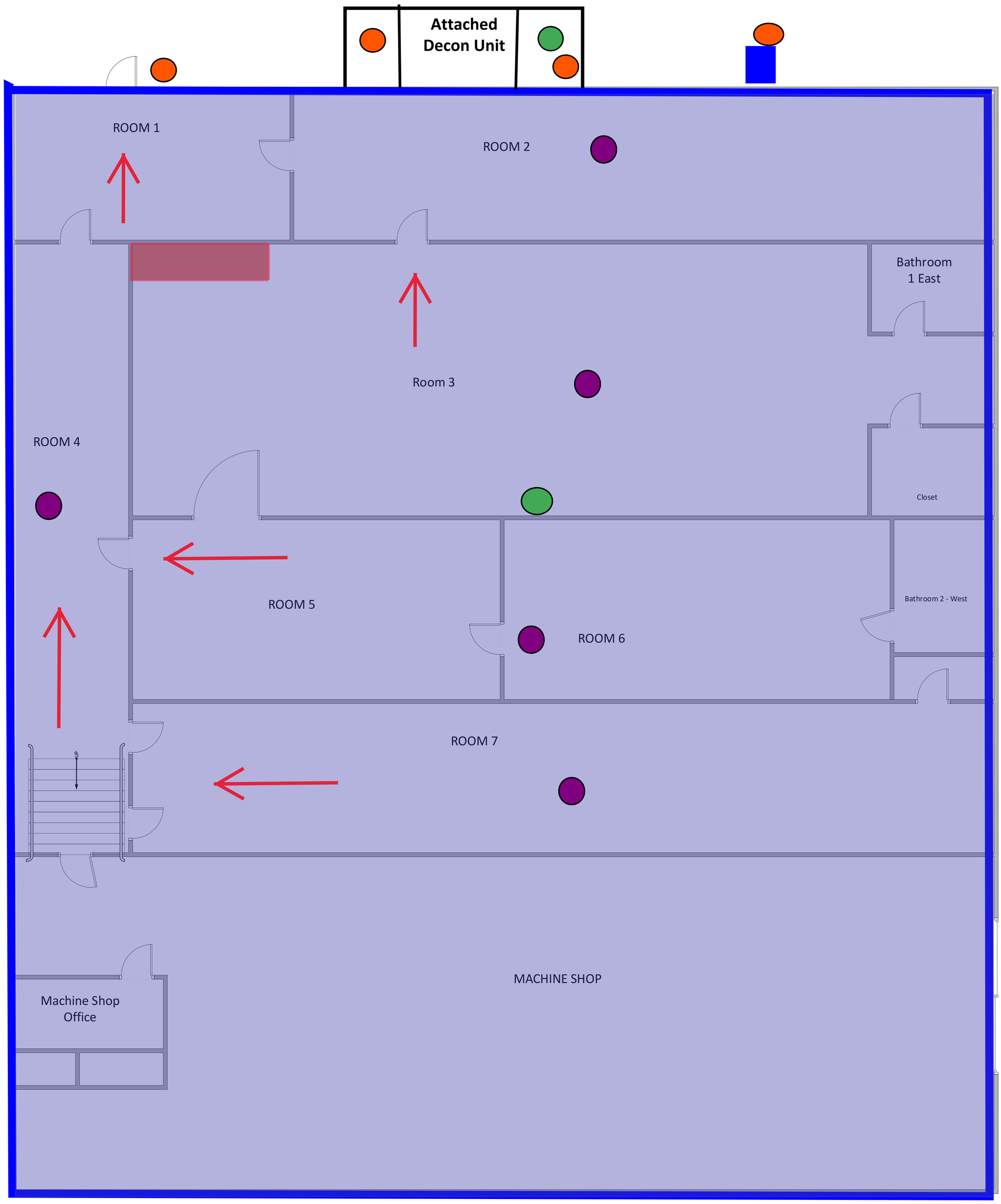
Negative Pressure Machines

Fire Extinguisher

Clearance Samples

Area Samples

N



ACM Ceiling Texture/Joint Compound

ACM Sheet Flooring

MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT

FLOOR PLAN – FIRST FLOOR

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

1
FIGURE

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.
1301 N MARTIN LUTHER KING AVENUE
OKLAHOMA CITY, OK 73117
405.616.0401 | FAX: 405.681.6753 | MEM@marshallenvironmental.com
www.marshallenvironmental.com

BULK ASBESTOS ANALYSIS

PROJECT INFORMATION		CONTACT INFORMATION	
PROJECT ID. NO.	0010-EN-010820-JO	COMPANY	Oklahoma DEQ Land Protection Division
PROJECT NAME	City of Luther Town Hall	ATTENTION	Alisha Grayson
ADDRESS	119 S Main Street	ADDRESS	PO Box 1677
CITY| STATE| ZIP	Luther, OK 73054	CITY| STATE| ZIP	Oklahoma City, OK 73101
SITE CONTACT	Scherrie Pidcock	PHONE NO.	405.702.5113
PHONE NO.	405.277.3833	ALTERNATE NO.	405.436.0953
EMAIL ADDRESS		EMAIL ADDRESS	alisha.grayson@deq.ok.gov

SAMPLE ID. NO.	SAMPLE DESCRIPTION	COLOR	% ASBESTOS		% MATRIX	
0030-021920-PLM-33A	Texture	White	2%	Chrysotile	88%	Calcium Carbonate
					10%	Paint
0030-021920-PLM-33B	Tape	White		NO ASBESTOS DETECTED	100%	Cellulose
0030-021920-PLM-33C	Joint Compound	White	2%	Chrysotile	98%	Calcium Carbonate
0030-021920-PLM-33D	Drywall	White		NO ASBESTOS DETECTED	85%	Gypsum
					15%	Cellulose
0030-021920-PLM-34A	Texture	White	2%	Chrysotile	88%	Calcium Carbonate
					10%	Paint
0030-021920-PLM-34B	Tape	White		NO ASBESTOS DETECTED	100%	Cellulose
0030-021920-PLM-34C	Joint Compound	White	2%	Chrysotile	98%	Calcium Carbonate
0030-021920-PLM-34D	Drywall	White		NO ASBESTOS DETECTED	85%	Gypsum
					15%	Cellulose
0030-021920-PLM-35	Ceiling Tile	White		NO ASBESTOS DETECTED	90%	Cellulose
					10%	Paint
0030-021920-PLM-36	Ceiling Tile	White		NO ASBESTOS DETECTED	90%	Cellulose
					10%	Paint

ANALYST NAME	Sandy West	ANALYST SIGNATURE	Sandy West	DATE ANALYZED	2/20/2020
ANALYTICAL METHODOLOGY	Test Methods: EPA/600/M4-82-020 as amended in 40 CFR, Part 763, Subpart E, Appendix E "Interim Method for determination of Asbestos in Bulk Insulation Samples", referred to as the US EPA 600/R-93/116 Method for the Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).			LAB ACCREDITATION	American Industrial Hygiene Association (AIHA) Bulk Asbestos Proficiency Analytical Testing (BPAT) Programs: Participant # 102334

Oklahoma Department of Labor

Jamie Marshall

has filed in the office of the Commissioner of Labor of the State of Oklahoma
an application for a Limited Asbestos Contractor's license for

AHERA MANAGEMENT PLANNER

Now, therefore, The Commissioner of Labor of the State of Oklahoma, by virtue of
the power vested in her by law hereby issues to the applicant license
No. OK-MP400477.

Leslie Osborn

Leslie Osborn

Commissioner of Labor

March 23, 2020

Date of Issuance

EXPIRES: March 11, 2021

Oklahoma Department of Labor

Asbestos License

This certifies that **Jamie Marshall**
has successfully met the certification requirements under the Oklahoma Asbestos Control Act 40 O.S. § 450, et seq. Abatement of Friable Asbestos Materials Rules OAC 380:50 in the following:

Management Planner

Leslie Osborn
Labor Commissioner

License # : 400477

Expires : 03/11/2021

Issued : 03/23/2020

Not intended for identification purposes

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.

ESTABLISHED IN 1987

Certified Industrial Hygiene
Asbestos & Lead-Based Paint
Environmental Science
Indoor Air Quality
Occupational Health & Safety
Research & Consultation
Training & Education

November 17, 2020

Clark Boswell
Oklahoma Department of Labor
3017 N Stile
Oklahoma City, OK 73105

RE: LUTHER TOWN HALL – PROJECT DESIGN AMENDMENT

Dear Mr. Horner:

This letter is to serve requesting an amendment to the Luther Town Hall Project. This letter is to clarify that there is no asbestos scope of work within the machine shop or machine shop offices and will not be part of the containment. Additionally, the contractor will be using internally vented negative air machines instead of externally vented and have an attached decontamination unit versus detached. The decontamination unit will be required to be under negative pressure while in use as well as 15 min before and after use.

If you have any questions, please do not hesitate to give us a call.

Sincerely,
Marshall Environmental Management, Incorporated

Jamie Marshall |MS|CIH
President

Remediation Reports

Tec-An, Inc.
Technical Environmental Consulting & Analysis

March31, 2021
DEQ
707 N Robinson
OKC, OK 73102
Attn: Katrina Pollard
Re: Summary of Work Former Luther Town Hall

The following is a summary of work that took place at the former Luther Town Hall (CAP Project # EN19004-11 / PO # 2929024011). This letter certifies that all asbestos/lead cleaning/disposal has been completed according to the work scope. All applicable test reports and other documentation is included in the letter.

Asbestos

Approximately 1,320 ft^2 of asbestos containing sheetrock ceilings were removed from the property. The removal followed the procedures and regulations laid out in the provided project design (attached).

Approximately 24 ft^2 of asbestos containing floor tile and mastic were removed from the area outlined in the provided asbestos inspection. The removal followed OSHA Class II procedures.

All friable and non-friable asbestos was disposed properly at the Waste Connections OKC Landfill. Manifests and disposal tickets are attached to this letter.

Lead

Lead dust cleaning in room #3 of the second floor. HEPA vacuum/wash the wood floor in room 3 upstairs. All floor cleaning was performed with TSP water mixture, mops and buckets. All wash water was collected, analyzed and disposed of properly.

After 2 attempts at cleaning the floors, the floors were sealed with Gulf Coast CS-669 Acrylic Sealer.

A TCLP test was performed on the wash water and lead waste separately and disposed of accordingly. The test results and waste tickets can be found in this letter.

Thank you for the opportunity to conduct the stated project. Please contact us when our services are needed again.

Respectfully

Grayson Cook

Tec-An, Inc. 2517 South Purdue Ave, Oklahoma City, OK 73128
Office: (405) 681-7076
Website: www.Tec-An.com or Facebook: www.facebook.com/TecAnInc/

Purchase Order

Dispatch via Print

Purchase Order	Date	Revision	Page
2929024011	10/09/2020		1
Payment Terms	**Freight Terms**		**Ship Via**
45 Days	Free on board at Destination		Common
Buyer	**Phone**		**Currency**
Tammi Frederick	405/702-0165		USD

Dept of Environmental Quality
OK DEPT OF ENVIRONMENTAL QUALITY
SHIPPING & RECEIVING
707 N ROBINSON
OKLAHOMA CITY OK 73102

Ship To: OK DEPT OF ENVIRONMENTAL QUALITY
SHIPPING & RECEIVING
707 N ROBINSON
OKLAHOMA CITY OK 73102

Supplier: 0000074805
TEC-AN INC
2517 PURDUE DR
OKLAHOMA CITY OK 73128-1830

Bill To: OK DEPT OF ENVIRONMENTAL QUALITY
ADMINISTRATIVE SERVICES
PO BOX 1677
OKLAHOMA CITY OK 73101-1677

Tax Exempt? Y **Tax Exempt ID:** 736017987

Line-Sch	Cat CD / Item Id	Description	Quantity	UOM	PO Price	Extended Amt	Due Date
1- 1	77101700 /	SERVICE: CAP, IDIQ, Environmental	1.0000	JA	23,990.0000	23,990.00	10/09/2020

CONSTRUCTION and PROPERTIES
NOTICE TO PROCEED
OCT 23, 2020
Work periods setforth in the Contract
begins upon receipt of this Purchase Order
CAPITAL ASSETS MANAGEMENT

Total PO Amount 23,990.00

COMMENTS:
INDEFINITE QUANTITY CONTRACT: This contract is for an indefinite quantity and the State may, or may not, buy the quantity mentioned in this contract. Vendor must clear all shipments with agency prior to shipping any portion of this contract.

ENTIRE CONTRACT: The entire contract the Purchasing Division awards pursuant to a solicitation shall consist of the invitation to bid, request for proposal, or request for quotation, Purchasing Division attachments, the supplier¿s bid or quotation with attachments and the purchase order the Purchasing Director issues. A contract the Purchasing Division awards shall incorporate by reference all provisions of the Oklahoma Central Purchasing Act and rules of the Purchasing Division. All Contracts with the State of Oklahoma are governed by the laws of Oklahoma. Venue for any action or claim shall be Oklahoma County, Oklahoma. The terms submitted by the vendor which serve to limit the liability of the vendor that are not in accordance with Oklahoma law are rejected and do not become a part of this contract.

Terms and Conditions: Acceptance of a purchase order from the Oklahoma Department of Environmental Quality constitutes acceptance of all current DEQ Purchasing terms and conditions. Terms and conditions are subject to change and may be found at https://www.deq.ok.gov/wp-content/uploads/deqmainresources/DEQ-Terms-and-Conditions.pdf

DEQ IS AN EQUAL OPPORTUNITY EMPLOYER

LPD CONTACT: SUZIE STILES/ SUZIE.STILES@DEQ.OK.GOV / 405-702-5214

PROJECT: Former Luther Town Hall

DIVISIONAL: Katrina Pollard: 405-702-5112| Katrina.Pollard@DEQ.OK.GOV

PROCUREMENT: TAMMI FREDERICK: 405-702-0165 | TAMMI.FREDERICK@DEQ.OK.GOV

ACCOUNTS PAYABLE: 405-702-1081 | ACCOUNTSPAYABLE@DEQ.OK.GOV

FOR AGENCY USE ONLY
JUSTIFICATION:
Under the Site Cleanup Assistance Program, DEQ will hire Tec-An, Inc. via the OMES IDIQ Environmental

Authorized Signature

Digitally signed by Stacey Tucker
DN: cn=Stacey Tucker, o=Oklahoma Department of Environmental Quality, ou=Administrative Services, email=Stacey.Tucker@deq.ok.gov, c=US
Date: 2020.10.12 10:58:03 -05'00'

Purchase Order

Dispatch via Print

Purchase Order	Date	Revision	Page
2929024011	10/09/2020		2
Payment Terms	**Freight Terms**		**Ship Via**
45 Days	Free on board at Destination		Common
Buyer	**Phone**		**Currency**
Tammi Frederick	405/702-0165		USD

Dept of Environmental Quality
OK DEPT OF ENVIRONMENTAL QUALITY
SHIPPING & RECEIVING
707 N ROBINSON
OKLAHOMA CITY OK 73102

Supplier: 0000074805
TEC-AN INC
2517 PURDUE DR
OKLAHOMA CITY OK 73128-1830

Ship To: OK DEPT OF ENVIRONMENTAL QUALITY
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707 N ROBINSON
OKLAHOMA CITY OK 73102

Bill To: OK DEPT OF ENVIRONMENTAL QUALITY
ADMINISTRATIVE SERVICES
PO BOX 1677
OKLAHOMA CITY OK 73101-1677

Tax Exempt? Y **Tax Exempt ID:** 736017987

Line-Sch	Cat CD / Item Id	Description	Quantity	UOM	PO Price	Extended Amt	Due Date

Abatement contract to perform the asbestos abatement and settled lead dust cleanup at the former Luther Town Hall in Luther, OK. All contaminated waste will be considered asbestos containing waste material and disposed of appropriately. The project will take approximately one month to complete.

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The Statement of Work, M302, M701, and cost proposal are attached.

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The attached cost estimate is for $23,990.00

CAP PROJECT # EN19004-11

CHARGE TO: OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

SEND INVOICES TO: CAP@OMES.OK.GOV, ATTN: LAURIE RYAN

Authorized Signature

CITY OF LUTHER
FORMER TOWNHALL

119 SOUTH MAIN STREET
LUTHER, OK 73054

JUNE 8, 2020 | ASBESTOS PROJECT DESIGN

Prepared For:

ODEQ Land Protection Division
Attention: Alisha Grayson | Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alisha.grayson@deq.ok.gov

Prepared By:

Marshall Environmental Management, Incorporated
Attention: Jamie Marshall, President
1301 North Martin Luther King Avenue
Oklahoma City, Oklahoma 73117
405.616.0401 | mem@marshallenvironmental.com

TABLE OF CONTENTS

FORMER CITY OF LUTHER TOWNHALL

ASBESTOS PROJECT DESIGN

SCOPE OF WORK

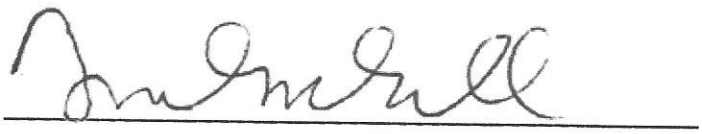
This Asbestos Project Design has been prepared to allow for the safe and economical removal of 1,320-square feet (ft^2) of ceiling texture/joint compounds throughout the first floor and approximately 24 ft^2 of floor tiles within Room 3 of the first floor of the Former City of Luther Townhall building located at 119 South Main Street in Luther, Oklahoma. Asbestos removal will be conducted in accordance with Oklahoma Asbestos Control (OAC) Act 380:50-23-4, ceiling texturing procedures.

RESPONSIBLE PARTIES & CONSULTANTS

LICENSED ASBESTOS ABATEMENT CONTRACTOR:

TBD

LICENSED ASBESTOS PROJECT DESIGNER:



Jamie Marshall, MS, CIH - President
Marshall Environmental Management, Inc.
1301 North Martin Luther King Avenue
Oklahoma City, Oklahoma 73117
405.616.0401 | mem@marshallenvironmental.com

OWNER REPRESENTATIVE:

ODEQ Land Protection Division
Attention: Alisha Grayson | Environmental Project Specialist
PO Box 1677
Oklahoma City, OK 73101
405.702.5113 | alsiha.grayson@deq.ok.gov

AGENCY STATEMENT

For the duration of this abatement project all local, state and federal regulations will apply. The regulations include, but are not limited to, the OAC Act, Abatement of Friable Asbestos Materials Rules 380:50-1-1 through 380:50-29-1.

SEQUENCING OF WORK, QUANTITY, TYPE & PERCENTAGE OF RACM

The abatement project will consist of one phase. The Licensed Asbestos Abatement Contractor shall file the notification of the intended start date based upon the schedule to be determined by the Owner. The abatement project duration is estimated to take approximately one (1) week to complete. Listed below is the location of the Regulated Asbestos-Containing Material (RACM) to be abated, including total quantity, type of material and percentage of asbestos as a result of polarized light microscopy (PLM) or point count testing. The sequencing of the abatement will be at the discretion of the abatement contractor, with approval from the owner and project design representative:

1) OAC Act 380:50-23-4, Ceiling Texture Procedures
    - **Work Area 1**:
        i. ~1,320-Ft^2 of ceiling texture and joint compound throughout the first floor of the building (2% Chrysotile)

EGRESS, EMERGENCY ESCAPE ROUTES & FIRE EXTINGUISHER PLACEMENT

The abatement work area will be clearly illuminated by droplights, light stands or equivalent lighting. Emergency lights will be in place where necessary, in all areas that are not properly illuminated to assist in the identification of the exit locations. Power to the area is to be supplied by the ground-fault circuit interrupter (GFCI) power source. All work will be performed using a buddy system. Exit routes from the containment work area will be clearly marked with signs and highly visible arrows designating the exit path.

Fire extinguishers shall meet the requirements of the OAC Act 380:50-15-14. A minimum of 1 A:B:C fire extinguisher shall be provided for each 3,000-ft^2 of the work area, or major fraction thereof travel distance from any point of the work area to the nearest fire. A minimum of two (2) fire extinguishers will be inside the work area. Additionally, a minimum of 1 fire extinguisher shall be placed in the clean room of the decontamination facility.

Prior to beginning the prep and abatement work, all licensed asbestos workers will be given a briefing on the emergency egress procedures by the asbestos supervisor.

DETAILS OF ABATEMENT PROJECT

Asbestos removal will be conducted in accordance with OAC Act 380:50-23-4, ceiling texture procedure abatement standards. Oklahoma Department of Labor (ODOL) and Oklahoma Department of Environmental Quality (ODEQ) National Emission Standards for Hazardous Air Pollutants (NESHAP) notices must be filed with the appropriate agencies for this Asbestos Project Design. Copies of the notifications are to be provided to the Project Designer and Owner Representative. The licensed Asbestos Abatement Contractor will mobilize to begin prep work based upon the notice to proceed and after coordination is confirmed with the Owner Representative. Moving of the containments will require that a written project design amendment be submitted to the ODOL. Following the completion of the project, all required project documents and waste manifests must be submitted to the ODOL and provided to the Project Design Representative.

The initial job site setup shall include the establishment of GFCIs for use with all portable electric equipment, lighting and the power used by the decontamination unit equipment, high efficiency particulate air (HEPA) vacuums and negative air machines. Electrical within the containment or work areas will be locked out and tagged out prior to any workers coming within arm's reach of any energized electric or systems prior to the commencement of prep

work. The contractor will prep all asbestos waste dumpsters in accordance with section 380:50-17-9 of the OAC Act. The following sequencing of events shall be used for each specified method:

WORK AREA 1: CEILING TEXTURE/JOINT COMPOUND

1) Due to the occupied space, an ***attached decontamination*** unit that will be utilized and constructed in accordance with Subchapter 15 of the OAC Act 380:50-15-7, 15-8 and 15-12 and will be set up as soon as feasible for use in the work areas.

2) During prep, critical barriers must be erected with a single layer of 6-mil poly covering the floors in compliance with the requirements of Section 380:50-23-4 of these Rules.

3) Within the work area, there will **one containment with 1 externally vented negative pressure air machine. The negative pressure machine will be functioning** at 1,200 cubic feet per minute (cfm) to provide a minimum of ***2 air exchanges per hour***. A manometer will not be required onsite and visual negative pressure at the entry flaps is sufficient for this project.

4) When prep is completed, scheduling of an ODOL Prep Inspection will occur.

5) Once the Prep Inspection is approved, the contractor may begin removal. Only asbestos workers wearing the appropriate PPE will be allowed within the asbestos barrier tape.

6) During the abatement process, asbestos containing materials will be continuously wetted down until asbestos removal is complete. Any water escaping from the work area shall be considered to have created a breach of containment.

7) After completion of the final cleaning, the contractor may apply lockdown sealant where applicable and 3rd party clearance air monitoring may be conducted.

8) Conduct a final inspection to verify the completion of the Scope of Work with the Project Design Representative.

9) Lastly, schedule an ODOL Final Inspection.

10) Tear down any prep work and demobilize after approval by the ODOL and Project Design Representative

AIR MONITORING REQUIREMENTS

Air monitoring samples will be collected and analyzed by a technician that is National Institute for Occupational Safety and Health (NIOSH) 582e-trained. The air monitoring samples will be collected in accordance with NIOSH 7400 method for the duration of the workday. Air monitoring samples will be analyzed by Phase Contrast Microscopy (PCM), in conjunction with a laboratory proficient with the American Industrial Hygiene Association's (AIHA's) Proficiency in Analytical Testing (PAT) Program.

PREP MONITORING

Pre-abatement air monitoring will not be required on this project.

ABATEMENT MONITORING

PERSONAL AIR MONITORING

- A minimum of two or 25% (whichever is greater) of the workers will be monitored during the abatement activities. Personal monitoring is required during abatement to assure adequate respirator protection factors are applied in respirator selection.
- At least one, 30-minute excursion sample will be collected during the abatement of the RACM. The excursion sample is to be representative of the work conducted for each activity that may generate a potential for worker exposure in excess of the Occupational Safety and Health Administration (OSHA) Permissible Exposure Limit (PEL) for the 30-minute excursion limit of 1.0-fiber per cubic centimeter (f/cc) as specified in OSHA'S Asbestos Standard for the Construction Industry (29 CFR 1926.1101).
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In accordance with OAC:50-11-1-3, inside and outside air monitoring will be conducted during the asbestos abatement. Area air samples will be collected and analyzed as specified in the Air Monitoring Requirements section above. Listed below are the locations of the area samples to be collected during the asbestos abatement.

- Inside the work area
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CODES & REGULATIONS

Wherever conflicts arise within the Project Design General Requirements or Procedures and/or among the applicable Rules and Regulations, the most stringent rules shall apply. This is subject to approval by ODOL or other authorities having jurisdiction (e.g. DEQ). If allowed by the authority with jurisdiction, a request for a variance can be submitted, provided it is acceptable to the Project Designer and Project Manager.

The Asbestos Abatement Contractor shall abide by this Project Design and the requirements, which govern friable asbestos removal in OAC Act 380:50, and require notification, worker training, and applicable transportation and disposal requirements for asbestos waste materials to include, but not limited to, the following:

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- 29 CFR 1926, OSHA Construction Industry Standard
- 29 CFR 1926, 1101 OSHA Asbestos Construction Standard
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- OAC 380:50 (All-inclusive), Oklahoma Rules for Abatement of Friable Asbestos Materials
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- OAC 252:515-19, Management of Solid Wastes (DEQ Asbestos Land Protection Division Asbestos Disposal Requirements)
- All Applicable State Statutes, County and City Codes/Ordinances

SOIL SAMPLING

This project does not require the removal of any soils contaminated with RACM.

REQUEST FOR VARIANCES

None

APPENDIX

LABORATORY ANALYSIS

EXAMPLE CONTAINMENT DRAWING

ASBESTOS PROJECT DESIGNER LICENSE

Oklahoma Department of Labor

Jamie Marshall

has filed in the office of the Commissioner of Labor of the State of Oklahoma
an application for a Limited Asbestos Contractor's license for

AHERA MANAGEMENT PLANNER

Now, therefore, The Commissioner of Labor of the State of Oklahoma, by virtue of
the power vested in her by law hereby issues to the applicant license
No. OK-MP400477.

Leslie Osborn

Leslie Osborn
Commissioner of Labor

March 23, 2020
Date of Issuance

EXPIRES: March 11, 2021

Marshall - 361-8138

Work Area Boundary

Escape Route

Negative Pressure Machines

Fire Extinguisher

Clearance Samples

Area Samples

N

loadout maybe

Front ?

ACM Ceiling Texture/Joint Compound

ACM Sheet Flooring

MAP IS NOT TO SCALE

MEM MARSHALL ENVIRONMENTAL MANAGEMENT	FLOOR PLAN – FIRST FLOOR CITY OF LUTHER FORMER TOWN HALL 119 SOUTH MAIN STREET LUTHER, OK 73054	1 FIGURE

Project Design Review Form

Oklahoma Department of Labor

Asbestos Division

Project Name: Former Luther Town Hall

Project No: 20-9609

Date: 6/08/20

3017 N. Stiles, Oklahoma City, OK 73105

Project Designer: Jamie Marshall

Phone – (405) 550-5743

Approved: ___X___

Disapproved: _____

	ITEM	ACCEPTED	REJECTED	COMMENTS
1.	**A statement that DOL Abatement of Friable Materials Rules apply.**	X		This project to be performed according to DOL Abatement of Friable Asbestos Rules OAC 380:50
2	**Sequencing and phasing of work.**	X		One Phase
3.	**Identification of means of egress and a fire protection plan and a diagram for emergency escape routes, and fire extinguisher placements.**	X		**Workers briefed on emergency egress procedures. 10 lb ABC fire extinguisher placed inside work area and outside.**
4.	**The quantity, type, percentage with bulk analysis unless presumed and a diagramed location of asbestos materials to be abated.**	X		1,320 SF of ceiling texture / joint compound containing 2% chrysotile.
5.	**Abatement methods, and techniques, and numbers of containments, glove bags or mini-containments.**	X		Per DOL OAC 380:50-23-4.
6.	**Details of personal and area air monitoring samples.**	X		**25% of the work force (minimum of 2 samples), work area, outside work area, load out, outside decon clean room, neg air exhaust.**
7.	**Numbers and locations of Clean Test samples and type of analysis to be employed.**	X		(5) PCM clearance samples achieving a minimum of 1200 L each sample.
8.	**Numbers, capacities, a diagram to identify locations, and discharge points, if any, of negative air machines.**	X		One externally vented neg air achieving a minimum of (2) air changes per hour.
	Details of project containment(s), glove bag or mini-containments, including drawings. Details shall include all applicable subchapters, including but not limited to scaffolding and live electric isolation.	X		Electric and HVAC locked out / tagged out, 6-mil poly criticals and floor, (material to remain must have a minimum of one layer of 4-mil poly unless cleaned and locked down), attached decon and load out.
10.	**Details of decontamination system(s).**	X		Attached three stage decon adhering to DOL OAC 380:50-15-7,8 and 12.
11.	**The extent to which asbestos-contaminated soils, if any, must be removed and the sampling methods of determining the efficacy of such removal.**	N/A		
12.	**Special materials or methods required to protect objects in the work area should be detailed, (plywood over carpeting or hardwood floors to prevent damage from scaffolds and/or falling materials.**	N/A		
13.	**Any variances from the Abatement of Friable Asbestos Materials Rules.**	**N/A**		

The Department of Labor reserves the right to require additional engineering or environmental controls consistent with the Abatement of Friable Asbestos Materials Rules which may be necessary because of discrepancies between this Project Design and field conditions or from unanticipated changes in field conditions.

REVIEWED BY: Clark Boswell DATE: 6.9.2020

DATE: 6/08/20 REVIEWED BY: Bernita Hall

PCM Asbestos Analysis Report

1235 Sovereign Row
Oklahoma City, OK 73108
(405) 286-5417 | www.StrongholdEnv.com

STRONGHOLD ENVIRONMENTAL

2010-09

Client:	Tec-An	Sample Date:	11/18/2020	Date Recivieved:	11/18/2020
Address:	2517 S Purdue Ave, OKC	Sampled By:	L. Pack	Analytical Method:	NIOSH 7400 Rev. #3
Name:	Tec-An	Lab Log #:	L20-021	Microscope Field	0.00785
Location:	119 S. Main St., Luther	Date Analyzed:	11/18/2020	Microscope	Olympus
Pro #:	20-09-0120	Lab Technician:	L. Pack	Cassette Lot #:	20200302

Sample ID #	Location / Worker # or Soc. #	Pump #	Sampling Time								Flow Rate		Total Vol	Fibers / Field	Fibers/ mm2	Det. Limit f/cc	Fiber Conc. f/cc	L.C.L	U.C.L	Results (f/cc)
			Start Hr	Start Min	Stop Hr	Stop Min	Start Hr	Start Min	Stop Hr	Stop Min	Start	Stop	L							
1	C. Gregory 401776 (3M FF)	L-01	13	34	17	55					2.5	2.4		VOID						
2	L. Wahpekeche 273095 (3M FF)	L-02	13	35	17	57					2.5	2.4		VOID						
3	OWA	W.M. Easy Air 1	12	56	17	48					2.5	2.5		VOID						
4	CR	W.M. Easy Air 2	12	56	17	48					2.5	2.5	730	1.5	1.91	0.0067	0.0010	0.0010	0.0091	BDL
5	NEG AIR (DR MD)	W.M. Easy Air 3	12	56	17	48					2.5	2.5	730	0.5	0.64	0.0067	0.0003	0.0003	0.0091	BDL
6	OWA (REAR OF BUILDING)	L-08	12	49	17	52					2.5	2.5	758	3.5	4.46	0.0065	0.0023	0.0022	0.0088	BDL
7	IWA	L-07	12	53	17	58					2.5	2.5		VOID						
8	BLANK													0						
9	BLANK													0						

Authorized Signature: Lori Pack

Date: 11/18/2020

Definitions: BDL = Below Detectable Limit
IWA = Inside Work Area, OWA = Outside Work Area, CR = Clean Room, NA = Negative Air

Notes: Samples from inside containment appered to have gotten wet and the portions that were not wet were overloaded with dirt. I was not able to read them. The OWA (outside work area) may have been contaminated.

PCM Asbestos Analysis Report

1235 Sovereign Row
Oklahoma City, OK 73108
(405) 286-5417 | www.StrongholdEnv.com

STRONGHOLD ENVIRONMENTAL

Client:	Tec-An	Sample Date:	11/19/2020	Date Recivieved:	11/19/2020
Address:	2517 S Purdue Ave, OKC	Sampled By:	L. Pack	Analytical Method:	NIOSH 7400 Rev. #3
Name:	Tec-An	Lab Log #:	L20-022	Microscope Field	0.00785
Location:	119 S. Main St., Luther	Date Analyzed:	11/19/2020	Microscope	Olympus
Pro #:	20-09-0120	Lab Technician:	L. Pack	Cassette Lot #:	20200302

Sample ID #	Location / Worker # or Soc. #	Pump #	Sampling Time								Flow Rate		Total Vol	Fibers / Field	Fibers/ mm2	Det. Limit f/cc	Fiber Conc. f/cc	L.C.L	U.C.L	Results (f/cc)
			Start Hr	Start Min	Stop Hr	Stop Min	Start Hr	Start Min	Stop Hr	Stop Min	Start	Stop	L							
10	B. Lowe 274493 (3M FF)	L-01	7	56	17	55					2.5	2.4	1468	100	127.39	0.0033	0.0334	0.0162	0.0138	0.0334
11	C. Gregory 401776 (3M FF)	L-02	8	13	17	57					2.5	2.3	1402	100	127.39	0.0035	0.0350	0.0170	0.0144	0.0350
12	OWA	W.M. Easy Air 1	8	2	17	48					2.5	2.5	1465	3.5	4.46	0.0033	0.0012	0.0011	0.0045	BDL
13	CR	W.M. Easy Air 2	8	2	17	48					2.5	2.5	1465	3	3.82	0.0033	0.0010	0.0010	0.0045	BDL
14	NEG AIR (DR MD)	W.M. Easy Air 3	8	2	17	48					2.5	2.5	1465	6	7.64	0.0033	0.0020	0.0019	0.0045	BDL
15	OWA (REAR OF BUILDING)	L-08	7	23	17	52					2.5	2.4	1541	2.5	3.18	0.0032	0.0008	0.0008	0.0043	BDL
16	IWA	L-07	8	56	17	58					2.5	2.5	763	100	127.39	0.0064	0.0643	0.0312	0.0266	0.0643
17	BLANK													0						
18	BLANK													0						
19	LOAD OUT	W.M. Easy Air 4	9	56	10	20					2.5	2.5	60	0	0.00	0.0817	0.0000	0.0000	0.1109	BDL
20	L. Wahpekeche 273095 (EXCURSION)	L-02	7	42	8	13					2.5	2.5	78	10	12.74	0.063283	0.06328	0.0606	0.0859	0.063283337

Authorized Signature: Lavi Pack

Date: 11/19/2020

Definitions: BDL = Below Detectable Limit

IWA = Inside Work Area, OWA = Outside Work Area, CR = Clean Room, NA = Negative Air

Notes:

PCM Asbestos Analysis Report

1235 Sovereign Row
Oklahoma City, OK 73108
(405) 286-5417 | www.StrongholdEnv.com

STRONGHOLD ENVIRONMENTAL

Client:	Tec-An	Sample Date:	11/23/2020	Date Recivieved:	11/23/2020
Address:	2517 S Purdue Ave, OKC	Sampled By:	L. Pack	Analytical Method:	NIOSH 7400 Rev. #3
Name:	Tec-An	Lab Log #:	L20-023	Microscope Field	0.00785
Location:	119 S. Main St., Luther	Date Analyzed:	11/24/2020	Microscope	Olympus
Pro #:	20-09-0120	Lab Technician:	L. Pack	Cassette Lot #:	20200302

Sample ID #	Location / Worker # or Soc. #	Pump #	Sampling Time								Flow Rate		Total Vol	Fibers / Field	Fibers/ mm2	Det. Limit f/cc	Fiber Conc. f/cc	L.C.L	U.C.L	Results (f/cc)
			Start Hr	Start Min	Stop Hr	Stop Min	Start Hr	Start Min	Stop Hr	Stop Min	Start	Stop	L							
21	L. Wahpekeche 273095 (3M FF)	L-01	8	5	15	5					2.5	2.5	1050	10	12.74	0.0047	0.0047	0.0045	0.0063	0.0047
22	B. Lowe 274493 (3M FF)	L-02	8	5	15	5					2.5	2.4	1029	15	19.11	0.0048	0.0071	0.0068	0.0065	0.0071
23	OWA	W.M. Easy Air 1	8	10	15	6					2.5	2.5	1040	1	1.27	0.0047	0.0005	0.0005	0.0064	BDL
24	CR	W.M. Easy Air 2	8	10	15	6					2.5	2.5	1040	3.5	4.46	0.0047	0.0017	0.0016	0.0064	BDL
25	NEG AIR (DR MD)	W.M. Easy Air 3	8	10	15	6					2.5	2.5	1040	3	3.82	0.0047	0.0014	0.0014	0.0064	BDL
26	OWA (REAR OF BUILDING)	L-08	7	55	15	7					2.5	2.5	1080	5.5	7.01	0.0045	0.0025	0.0024	0.0062	BDL
27	IWA	L-07	8	5	15	5					2.5	2.5	1050	12.5	15.92	0.0047	0.0058	0.0056	0.0063	0.0058
28	BLANK													0						
29	BLANK													0						
30	LOAD OUT	W.M. Easy Air 4	10	15	10	31					2.5	2.5	40	0	0.00	0.1226	0.0000	0.0000	0.1664	BDL

Authorized Signature: Lori Pack

Date: 11/24/2020

Definitions: BDL = Below Detectable Limit

IWA = Inside Work Area, OWA = Outside Work Area, CR = Clean Room, NA = Negative Air

Notes:

PCM Asbestos Analysis Report

1235 Sovereign Row
Oklahoma City, OK 73108
(405) 286-5417 | www.StrongholdEnv.com

STRONGHOLD ENVIRONMENTAL

Client:	Tec-An	Sample Date:	11/24/2020	Date Recivieved:	11/24/2020
Address:	2517 S Purdue Ave, OKC	Sampled By:	L. Pack	Analytical Method:	NIOSH 7400 Rev. #3
Name:	Tec-An	Lab Log #:	L20-024	Microscope Field	0.00785
Location:	119 S. Main St., Luther	Date Analyzed:	11/24/2020	Microscope	Olympus
Pro #:	20-09-0120	Lab Technician:	L. Pack	Cassette Lot #:	20200302

Sample ID #	Location / Worker # or Soc. #	Pump #	Sampling Time								Flow Rate		Total Vol	Fibers / Field	Fibers/ mm2	Det. Limit f/cc	Fiber Conc. f/cc	L.C.L	U.C.L	Results (f/cc)
			Start Hr	Start Min	Stop Hr	Stop Min	Start Hr	Start Min	Stop Hr	Stop Min	Start	Stop	L							
31	CLEARANCE NORTH	W.M. Easy Air 1	7	55	10	25					10	10	1500	3	3.82	0.0033	0.0010	0.0009	0.0044	BDL
32	CLEARANCE SOUTH	W.M. Easy Air 2	7	55	10	25					10	10	1500	6	7.64	0.0033	0.0020	0.0019	0.0044	BDL
33	CLEARANCE EAST	W.M. Easy Air 3	7	55	10	25					10	10	1500	2.5	3.18	0.0033	0.0008	0.0008	0.0044	BDL
34	CLEARANCE WEST	W.M. Easy Air 4	7	55	10	25					10	10	1500	3	3.82	0.0033	0.0010	0.0009	0.0044	BDL
35	CLEARANCE CENTRAL	W.M. Easy Air 5	7	55	10	25					10	10	1500	4	5.10	0.0033	0.0013	0.0013	0.0044	BDL

Authorized Signature: Levi Pack

Date: 11/24/2020

Definitions: BDL = Below Detectable Limit

IWA = Inside Work Area, OWA = Outside Work Area, CR = Clean Room, NA = Negative Air

Notes:

2010-04

NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

WASTE CONNECTIONS INC. *Connect with the Future®*

If waste is asbestos waste, complete Sections I, II, III and IV.
If waste is NOTasbestos waste, complete only Sections I, II and III. Tare, Wt. _____ No. 1020454

Section I GENERATOR (Generator completes all of Section I)

a. Generator Name: City of Luther
b. Generating Location: Former Luther town Hall
c. Address 108 Main Street Luther, Ok
d. Address 119 South Main Street Luther Ok
e. Phone No.: 405-277 3833
f. Phone No.: (405) 277-3833

If owner of the generating facility differs from the generator, provide:

g. Owner's Name: City of Luther
h. Purchase Order No.:

i. WC WASTE CODE: 19-524

j. Description of Waste: ACM Sheet Rock

k. Quantity: 20 | Units: Y³ | Containers No.: 01 | TYPE: BA

TYPE
DM - METAL DRUM
DP - PLASTIC DRUM
B - BAG
BA - 6 MIL. PLASTIC BAG or WRAP
T - TRUCK
O - OTHER

UNITS
P - POUNDS
Y - YARDS
M³ - CUBIC METERS
Y³ - CUBIC YARDS
O - OTHER

GENERATOR'S CERTIFICATION: I hereby certify that the above named material is not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law, has been properly described, classified and packaged, and is in proper condition for transportation according to applicable regulations; **AND, if the waste is a treatment residue of a previously restricted hazardous waste** subject to the Land Disposal Restrictions, I certify and warrant that the waste has been treated in accordance with the requirements of 40 CFR Part 268 and is no longer a hazardous waste as defined by 40 CFR Part 261.

Jose Moreno — Generator Authorized Agent Name
11-25-20 — Signature
11/25/20 — Shipment Date

Section II TRANSPORTER (Generator complete a-d; Transporter I complete e-g) Transporter II complete h-n)

TRANSPORTER I

a. Name: Tec-Am INC
b. Address: 2517 S. Purdue Oklahoma City OK 73128
c. Driver Name/Title: Jose Moreno Supervisor
d. Phone No.: (405) 681 7076
e. Truck No.: Chevy bob
f. Vehicle License No./State: EFC-159 Okla
Acknowledgment of Receipt of Materials:
g. Jose Moreno — Driver Signature
11/25/20 — Shipment Date

TRANSPORTER II

h. Name: SAME
i. Address: SAME
j. Driver Name/Title:
k. Phone No.: SAME
l. Truck No.: SAME
m. Vehicle License No./State: SAME
Acknowledgment of Receipt of Materials:
n. Driver Signature
Shipment Date

Section III DESTINATION (Generator completes a-d; destination site completes e-f.

a. Site Name: **WASTE CONNECTIONS**
b. Physical Address: **Oklahoma City Landfill 7600 S.W. 15th • Oklahoma City, OK 73128**
c. Phone No.: **(405) 745-3091**
d. Fax No.: **(405) 745-3611**
e. Discrepancy Indication Space:

I hereby certify that the above named material has been accepted and to the best of my knowledge the foregoing is true and accurate.

f. _____ — Name of Authorized Agent
Signature
1/28/20 — Receipt Date
02/1695225

Section IV ASBESTOS (Generator completes a-d; f, g, Shipper* completes e.

a. Shipper's* Name: Tec-Am INC
b. Shipper's* Phone No.:
c. Shipper's* Address: 2517 South Purdue
d. Shipper's* Special Handling Instructions and additional information: 1/2 face on disposial suit

CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

e. Shipper's* Name & Title: Jose Moreno SUP.
b. Shipper's* Phone No.: (405) 681-7024
11/25/20 — Date

f. Name and Address of Responsible Agency: City of Luther

g. ☒ Friable; ☐ Non-friable; ☐ Both _____% friable _____% nonfriable

*Shipper refers to the company which owns, leases, operates, controls, or supervises the facility being demolished or renovated, or the demolition or renovation operation, or both.

WC1000 (Rev. 11/17)

White - Destination Retain Green - Return to Generator Canary - Return to Operator Pink - Transporter Retain Goldenrod - Generator Retain

OKLAHOMA CITY LANDFILL/WCI
7600 SW 15TH STREET
OKLAHOMA CITY, OK 73128

INBOUND CHARGE

007583 TEC-AN INC
2517 S. PURDUE
OKLAHOMA CITY OK 73128

SITE	TICKET	GRID	WEIGHMASTER
02	01890388	NEW	SHELLY MELENDEZ

DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
11/17/20	11/17/20	08:40	08:40	TECAN2	

REFERENCE	ORIGIN

Manual Gross Wt.	15000 LB
Stored Tare Wt.	14500 LB
Net Weight	500 LB

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
10.00	CU YD	WASTE/CU YD				

2010-09

Is this load from the OKC limits?__ Yes__ No..I certify this load contains no unauthorized hazardous waste & understand falsification of a waste manifest is a criminal offense & hereby affirm this information is correct.Phone:405-745-3091

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

SIGNATURE_____

OKLAHOMA CITY LANDFILL/WCI
7600 SW 15TH STREET
OKLAHOMA CITY, OK 73128

INBOUND CHARGE

007583 TEC-AN INC
2517 S. PURDUE
OKLAHOMA CITY OK 73128

SITE	TICKET	GRID	WEIGHMASTER
02	01895225		SHELLY MELENDEZ

DATE IN	DATE OUT	TIME IN	TIME OUT	VEHICLE	ROLL OFF
12/01/20	12/01/20	09:14	09:14		

REFERENCE	ORIGIN
19-524	12/1/2020

Manual Gross Wt. 13260 LB
Manual Tare Wt. 10260 LB
Net Weight 3000 LB

QTY.	UNIT	DESCRIPTION	RATE	EXTENSION	FEE	TOTAL
5.00	CU YD	Special Waste(YD)				

1 - 2011-10
2 - 2011-06
1 - 2010-09

Is this load from the OKC limits?__ Yes__ No..I certify this load contains no unauthorized hazardous waste & understand falsification of a waste manifest is a criminal offense & hereby affirm this information is correct.Phone:405-745-3091
Source: VARIOUS LOCATIONS
Location: SHAWNEE, OK
Manifest#: 1020455,1020454,102453

NET AMOUNT
TENDERED
CHANGE
CHECK NO.

SIGNATURE_____

Oklahoma Department of Labor
www.ok.gov/odol/

3017 North Stiles, Suite 100
Oklahoma City, OK 73105
405-521-6464 ▪ 888-269-5353
Fax: 405-521-6025

Abatement Preparation Inspection Form

Abatement Project: Former Luther Town Hall Date: 11-12-20 Time: 11:10
Project No.: 20-7609 Phase: 1 - Drywall/popcorn texture removal
Project Address/Location: 119 S Main Street City: Luther Zip: _____
Contractor: Tec Air Contact Person: Joe Moreno

A = Acceptable
D = Denied; must be correct and re-inspected before asbestos removal is begun
N/A = Not applicable to this project

X = Deficiencies which must be corrected before asbestos removal begins. If the only deficiencies are the "X" type, after correction, asbestos abatement may begin.
Beginning asbestos removal before the deficiencies are correct shall constitute a Serious Violation.

	A	D	N/A	X
(1) Work site barriers and warning signs	☒	☐	☐	☐
(2) Toilet facilities provided	☒	☐	☐	☐
(3) Worker licenses	☒	☐	☐	☐
(4) Emergency telephone #s	☒	☐	☐	☐
(5) OSHA forms, poster (min. wage, workers comp, equal opportunity)	☒	☐	☐	☐
(6) Air mon., results from prior phases, if applicable	☐	☐	☒	☐
(7) Respirator program and and project design on-site	☒	☐	☐	☐
(8) Current Fit Test	☒	☐	☐	☐
(9) NIOSH approved respirators, clean, parts in working order	☒	☐	☐	☐
(10) Electrical panel outside work area	☒	☐	☐	☐
(11) Electrical system in abatement area locked out/ tagged out	☒	☐	☐	☐
(12) Temporary wiring installed by licensed electrician LIC #:	☐	☐	☒	☐
(13) Temporary panel boards properly grounded	☒	☐	☐	☐
(14) Ground fault interruption provided from outside work area	☒	☐	☐	☐
(15) Live electrical requirement met	☐	☐	☒	☐
(16) Extension cords in acceptable condition	☒	☐	☐	☐
(17) Equipment properly grounded	☒	☐	☐	☐
(18) De-con firmly constructed, opaque, with triple flaps	☒	☐	☐	☐
(19) Storage lockers for workers and ODOL inspectors' street clothes	☒	☐	☐	☐
(20) Shower with hot water supply, stable nonskid surface, lights	☒	☐	☐	☐
(21) Shower drains, filter, proper water disposal	☒	☐	☐	☐
(22) Soap from dispenser, and towels provided	☒	☐	☐	☐
(23) Hearing protection provided if required	☒	☐	☐	☐
(24) Hard hats provided, if required	☒	☐	☐	☐
(25) Appropriate footwear/safety shoes provided, if required	☒	☐	☐	☐
(26) Ventilation serving or passing through the abatement area deactivated	☒	☐	☐	☐
(27) Critical barriers in place	☒	☐	☐	☐
(28) Neg. air quantity and pressure drop, confirmed on-site with recording manometer	☐	☐	☒	☐
(29) Neg. air machine(s) have properly installed filters, clean pre-filters	☒	☐	☐	☐
(30) Prep. work secure with negative air on	☒	☐	☐	☐
(31) Make-up air sources provide adequate circulation and air cleaning	☒	☐	☐	☐
(32) Access controlled	☒	☐	☐	☐
(33) Scaffolding over 10' high has 42" side rails and 4" toe boards	☐	☐	☒	☐
(34) Scaffolding from 4' to 10' high, but less than 42" wide, has side rails	☐	☐	☒	☐
(35) Scaffolding with people working under has mesh or solid barrier on platform	☐	☐	☑	☐
(36) Scaffolding floorboards in good condition and secured	☐	☐	☒	☐
(37) Aerial lifts have full-body harness with shock lanyards	☐	☐	☒	☐
(38) Ladders are non-conducting and stable	☑	☐	☐	☐
(39) Heat stress monitors in place	☑	☐	☐	☐
(40) HEPA vacuum is clean with filters properly installed	☑	☐	☐	☐
(41) Temporary lighting is adequate and properly wired and grounded	☒	☐	☐	☐
(42) 10 # ABC fire extinguishers inspected	☑	☐	☐	☐
(43) Adequate escape routes are properly marked and illuminated with emergency lighting and battery back-up.	☒	☐	☐	☐
(44) Acceptable amended water sprayers and chemicals provided	☒	☐	☐	☐
(45) Load-out sealed unless needed for make-up air	☒	☐	☐	☐
(46) Disposal bags and/or barrels provided and properly labelled	☒	☐	☐	☐
(47) Disposal vehicle properly lined	☒	☐	☐	☐
(48) Area monitoring locations identified	☑	☐	☐	☐
(49) Other	☐	☐	☐	☐

OF GLOVEBAGS # OF FULL CONTAINMENTS # OF MINI CONTAINMENTS

Recommendations & Remarks:

Prep accepted for popcorn texture ceiling scrape/substrate removal.

Orders:

☐ Imminent Danger

Inspector's Signature

Contractor's or Representative's Signature

Oklahoma Department of Labor

3017 North Stiles, Suite 100
Oklahoma City, OK 73105
(405-521-6464) FAX (405-521-6025)

Asbestos Division

Visual/Final Inspection Form

DOL Project #:	20-9609	11	25	20	9:00
Facility:	Former Luther Town Hall	Month	Day	Year	Time
Contractor #:		County #:		FY #:	2021
Address/Location:	119 S Main Street	Address City:	Luther		
Owner/Occupant:	City of Luther	Contractor:	TecAir		
Contact Name:		Contractor's Rep.:	Joe Moreno		
Facility Phone #:	(405) 277-3533	Contractor's Phone #:	(405) 350-4383		

1. Description of Area: Vacant former Luther Town Hall requiring the removal 1,320 SF of drywall ceiling texture and joint compound.

2. Areas requiring further cleaning: None

3. Air Counts (PCM/TEM) On-Site?: Yes. All clearances acceptable.

4. DOL Recommendations: Remove all poly and tape and dispose of as ACM.

5. Will a FINAL inspection be required?: This is the final.

6. Notes: Visual and Final Accepted
(This Project is Complete)

7. Note any violations cited: 380:50-

8. Contractor's Comments:

Inspector's Signature

Contractor's Signature

Oklahoma Department of Labor

12/7/2020

Leslie Osborn
COMMISSIONER OF LABOR

04-Dec-20

TEC-AN Inc
2517 South Purdue
Oklahoma City, OK 73128

NOTICE OF PROJECT DEFICIENCIES

Abatement Project #: 20209609
Location: Former City of Luther
Start Date: 11/18/2020
End Date: 11/25/2020
Owned by City of Luther

20209

DEFICIENCIES FOR CLOSING ABATEMENT PROJECT FILE:

1.	**380:50-9-3(2)**	**Daily Air Monitoring and Clearance Samples**
2.	**380:50-9-7**	**Waste Manifest**

PLEASE SUBMIT THESE DOCUMENTS SO WE MAY CLOSE THE FILE.

If documents have been submitted disregard notice or contact us.

Laboratory Analytical Report

ENVIRONMENTAL TESTING, INC.
4619 N. Santa Fe Ave
Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

08 February 2021

Mr. Grayson Cook

Tec-An Inc.
2517 S. Purdue Ave.
Oklahoma City, OK 73128

WO: E1B0016
RE: Luther Town Hall

Enclosed are the results of analyses for samples received by the laboratory on 2/1/2021. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Russell Britten
President

Original (P)

E1B0016

ENVIRONMENTAL TESTING, INC.

4619 N. Santa Fe Ave
Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

Tec-An Inc.	Project: Luther Town Hall	
2517 S. Purdue Ave.	Project Number: [none]	**Reported:**
Oklahoma City OK, 73128	Project Manager: Mr. Grayson Cook	02/08/21 13:22

01

E1B0016-01 (Solid) - Sampled: 01/20/21 10:00

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Qualifiers
TCLP Extraction by EPA 1311									
TCLP Extraction	Completed		N/A		EJB0037	LT	02/01/21 16:45	EPA 1311 1992	T-02, U-03, U-04
TCLP Metals by 6000/7000 Series Methods									
Lead	<0.100	0.100	mg/L	1	EJB0126	LSB	02/05/21 15:00	EPA 6010C 2007	
Metals Digestion	Completed		N/A		EJB0126	LSB	02/04/21 19:00	EPA 3010A 1992	

Environmental Testing, Inc.

Russell Britten, President

The results in this report apply to the samples analyzed in accordance with the chain of custody document and meet all laboratory accreditation requirements unless noted otherwise. This analytical report must be reproduced in its entirety.

E1B0016

ENVIRONMENTAL TESTING, INC.

4619 N. Santa Fe Ave
Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

Tec-An Inc.	Project: Luther Town Hall	
2517 S. Purdue Ave.	Project Number: [none]	**Reported:**
Oklahoma City OK, 73128	Project Manager: Mr. Grayson Cook	02/08/21 13:22

02

E1B0016-02 (Aqueous) - Sampled: 01/20/21 10:05

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Qualifiers
Metals by EPA 6000/7000 Series Methods									
Lead	**0.104**	0.0100	mg/L	1	EJB0124	LSB	02/05/21 12:30	EPA 6010D 2018	
Metals Digestion	Completed		N/A		EJB0124	LSB	02/04/21 19:00	EPA 3005A 1992	

Environmental Testing, Inc.

Russell Britten, President

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Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

Tec-An Inc.	Project: Luther Town Hall	
2517 S. Purdue Ave.	Project Number: [none]	**Reported:**
Oklahoma City OK, 73128	Project Manager: Mr. Grayson Cook	02/08/21 13:22

QUALITY CONTROL

Metals by EPA 6000/7000 Series Methods
Environmental Testing, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifiers
Batch EJB0124 - EPA 3005										
Blank (EJB0124-BLK1)				**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	<0.0100	0.0100	mg/L							
Metals Digestion	Completed		N/A							
LCS (EJB0124-BS1)				**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	0.524	0.0100	mg/L	0.5000		105	80-120			
Metals Digestion	Completed		N/A							
Duplicate (EJB0124-DUP1)		**Source: E1B0051-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	<0.0100	0.0100	mg/L		ND				20	
Metals Digestion	Completed		N/A							
Matrix Spike (EJB0124-MS1)		**Source: E1B0051-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	0.508	0.0100	mg/L	0.5000	ND	102	75-125			
Metals Digestion	Completed		N/A							
Matrix Spike Dup (EJB0124-MSD1)		**Source: E1B0051-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	0.500	0.0100	mg/L	0.5000	ND	100	75-125	2	20	
Metals Digestion	Completed		N/A							

Environmental Testing, Inc.

Russell Britten, President

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E1B0016

ENVIRONMENTAL TESTING, INC.

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Oklahoma City, OK 73118
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www.etilab.com

Tec-An Inc.	Project: Luther Town Hall	
2517 S. Purdue Ave.	Project Number: [none]	**Reported:**
Oklahoma City OK, 73128	Project Manager: Mr. Grayson Cook	02/08/21 13:22

QUALITY CONTROL

TCLP Extraction by EPA 1311
Environmental Testing, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifiers
Batch EJB0037 - EPA 1311										
Blank (EJB0037-BLK1)				**Prepared & Analyzed: 02/01/21**						
TCLP Extraction	Completed		N/A							T-02

Environmental Testing, Inc.

Russell Britten, President

The results in this report apply to the samples analyzed in accordance with the chain of custody document and meet all laboratory accreditation requirements unless noted otherwise. This analytical report must be reproduced in its entirety.

E1B0016

E1B0016
Original
ETI_OKC_RPT.MRL_rev20.0.rpt

ENVIRONMENTAL TESTING, INC.

4619 N. Santa Fe Ave
Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

Tec-An Inc.	Project: Luther Town Hall	
2517 S. Purdue Ave.	Project Number: [none]	**Reported:**
Oklahoma City OK, 73128	Project Manager: Mr. Grayson Cook	02/08/21 13:22

QUALITY CONTROL

TCLP Metals by 6000/7000 Series Methods
Environmental Testing, Inc.

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifiers
Batch EJB0126 - EPA 3005 TCLP										
Blank (EJB0126-BLK1)				**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	<0.100	0.100	mg/L							
Metals Digestion	Completed		N/A							
LCS (EJB0126-BS1)				**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	5.28	0.100	mg/L	5.000		106	80-120			
Metals Digestion	Completed		N/A							
Duplicate (EJB0126-DUP1)		**Source: E1B0016-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	0.0960	0.100	mg/L		0.0930			3	20	
Metals Digestion	Completed		N/A							
Matrix Spike (EJB0126-MS1)		**Source: E1B0016-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	5.40	0.100	mg/L	5.000	0.0930	106	75-125			
Metals Digestion	Completed		N/A							
Matrix Spike Dup (EJB0126-MSD1)		**Source: E1B0016-01**		**Prepared: 02/04/21 Analyzed: 02/05/21**						
Lead	5.46	0.100	mg/L	5.000	0.0930	107	75-125	1	20	
Metals Digestion	Completed		N/A							

Environmental Testing, Inc.

Russell Britten, President

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E1B0016

ENVIRONMENTAL TESTING, INC.

4619 N. Santa Fe Ave
Oklahoma City, OK 73118
405.488.2400 Phone
405.488.2404 Fax
www.etilab.com

Tec-An Inc. 2517 S. Purdue Ave. Oklahoma City OK, 73128	Project: Luther Town Hall Project Number: [none] Project Manager: Mr. Grayson Cook	**Reported:** 02/08/21 13:22

Certifications

Code	Description	Number	Expires
NELAP/OK	NELAP Accredited (ODEQ)	2020-069	08/31/2021
TCEQ	Texas Accedited (TCEQ)	T104704498-20-10	03/31/2021

Qualifiers and Definitions

Abbreviation	Description
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
RPD	Relative Percent Difference
x	Non-Certified analyte
NA	Not Applicable

Qualifier	Description
COM	Completed
T-02	The sample was tumbled outside the method requirement of 21-25°C
U-03	Due to limited sample material, less than 100g of sample was used for the TCLP extraction.
U-04	Insufficient sample to do TCLP pre-test for extraction fluid evaluation. Sample was extracted with TCLP fluid #2

ENVIRONMENTAL TESTING, INC.

Sample Receipt Form: E1B0016

Environmental Testing, Inc.

Printed: 2/1/2021 11:51:25AM

E-1-B-0016

Client:	**Tec-An Inc.**	**Project Manager:**	**Mr. Grayson Cook**
Project:	**Luther Town Hall**	**Project Number:**	**[none]**

Report To:
Tec-An Inc.
Mr. Grayson Cook
2517 S. Purdue Ave.
Oklahoma City, OK 73128
Phone: (405) 681-2076
Fax: (405) 681-7256

Invoice To:
Tec-An Inc.
Ms. Leslie Ingle
2517 S. Purdue Ave.
Oklahoma City, OK 73128
Phone: (405) 681-2076
Fax: (405) 681-7256

Date Due:	02/08/21 17:00 (5 day TAT)		
Received By:	Stephanie Saul	Date Received:	02/01/21 11:23
Logged In By:	Andra Hoot	Date Logged In:	02/01/21 11:49

Samples Received at: **22.3°C**

Custody seals	No	Received on ice	No	Sufficient sample	Yes
Containers intact	Yes	Sample or temp blank frozen	No		
COC/Labels agree	Yes	Headspace in VOA vials	No		
Preservation confirmed	No	Correct containers	Yes		

Notes:

Preservation Confirmation

Container ID	Container Type	pH	Date/Time	Lot #
E1B0016-02 B	Poly HNO3 - 250mL Prepared in Lab	<2	2.1.21 11:50	245675

Steph Saul
Preservation Confirmed By

2.1.21
Date

Reviewed By

Date

wko_EOC_wpres_rev6.0.rpt

ENVIRONMENTAL TESTING, INC.

Environmental Testing Inc.
4619 N. Santa Fe
Oklahoma City, OK 73118

CHAIN OF CUSTODY
Phone: (405) 488-2400
Fax: (405) 488-2404

Page 1 of 1

COC Number
Lab Work Order Number 2101016

Client Name: Tec-An, Inc		Project Name: Luther Town Hall	
Client Contact: Grayson Cook		Project Number:	
Address: 2517 S Purdue Ave.		Project Description: Lead Remediation	
City: Oklahoma City		PO Number: 2010-09	
State/Zip: Oklahoma / 73128		Shipped By:	
Phone: 405-681-7076	Fax:	Tracking Number:	
Sampler: Grayson Cook		Sampler Signature:	

Requested Analyses: Total (SS) Lead TCLP; Total Lead

Requested Turn Around: Rush requests subject to additional charge. Rush requests subject to lab approval. Standard (days) ✓; Expedited (days); Due Date

Sample Name or Field ID	Sampled Date	Sampled Time	Sample Type Code	Matrix Code	Container Count	Preservation Code										Sample Comments
1 01	1/20/2021	10:00	S		P	✓										
2 02	1/20/2021	10:05	T		P		✓									

Relinquished By: [signature]	Date/Time: 2.1.21 11:23	Received By: [signature]	Date/Time: 2.1.21	11:23
Relinquished By:	Date/Time:	Received By:	Date/Time:	Comments: 21.0+1.3 = 22.3 T1000043 NO ILE
Relinquished By:	Date/Time:	Received By:	Date/Time:	
Cooler Numbers and Temperatures:				

Matrix Codes:

Preserv. Codes:

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.

ESTABLISHED IN 1987

Certified Industrial Hygiene
Asbestos & Lead-Based Paint
Environmental Science
Indoor Air Quality
Occupational Health & Safety
Research & Consultation
Training & Education

April 26, 2021

Oklahoma Department of Environmental Quality
Site Cleanup Assistance Program, Land Protection Division
Attention: Katrina Pollard
707 N Robinson Avenue
Oklahoma City, OK 73102

RE: CITY OF LUTHER TOWN HALL – ASBESTOS ABATEMENT OVERSIGHT

Ms. Pollard:

Marshall Environmental Management, Incorporated (MEM) has completed the oversight of the asbestos abatement within the City of Luther Town Hall located at 119 South Main Street in Luther, Oklahoma. As part of the initial inspection conducted in February 2020, asbestos containing ceiling texture/joint compound and floor tile was identified. As part of the Regulated ACM removal (i.e., the abatement is regulated by the Oklahoma Department of Labor) of the Friable ceiling texture/joint compound, MEM provided an asbestos abatement project design in which one amendment was requested by the asbestos abatement contractor, Tec An. On November 20, 2020, MEM conducted a site visit of the City of Luther Town Hall following the completion of the Category I Non-Friable asbestos abatement of the floor tile, in which work was completed and satisfactory.

A site visit was once again completed on November 25, 2020, of the 1st floor following the completions of the ODOL regulated Friable ACM removal of the ceilings located throughout the 1st floor. Following the abatement, the clearance air sampling results were acceptable, and the abatement activities were considered satisfactory.

In conclusion, the determination of compliance was carried out in accordance with Good Industrial Hygiene Practices by Jamie Marshall, Certified Industrial Hygienist (CIH) and President of MEM. Once you have had a chance to review, feel free to call or email with any questions. Thank you for allowing MEM the opportunity to be of service.

Sincerely,
Marshall Environmental Management, Incorporated

Jamie Marshall, MS, CIH
President
ABIH Comprehensive Practice Certificate #10595CP

MARSHALL ENVIRONMENTAL MANAGEMENT, INC.

ESTABLISHED IN 1987

Certified Industrial Hygiene
Asbestos & Lead-Based Paint
Environmental Science
Indoor Air Quality
Occupational Health & Safety
Research & Consultation
Training & Education

November 17, 2020

Clark Boswell
Oklahoma Department of Labor
3017 N Stile
Oklahoma City, OK 73105

RE: LUTHER TOWN HALL – PROJECT DESIGN AMENDMENT

Dear Mr. Horner:

This letter is to serve requesting an amendment to the Luther Town Hall Project. This letter is to clarify that there is no asbestos scope of work within the machine shop or machine shop offices and will not be part of the containment. Additionally, the contractor will be using internally vented negative air machines instead of externally vented and have an attached decontamination unit versus detached. The decontamination unit will be required to be under negative pressure while in use as well as 15 min before and after use.

If you have any questions, please do not hesitate to give us a call.

Sincerely,
Marshall Environmental Management, Incorporated

Jamie Marshall |MS|CIH
President

MEM
MARSHALL ENVIRONMENTAL MANAGEMENT

Oversite Daily Log

Project ID 0268-AB/LBP-111620-JM Location 119 S. Main St. Luther, OK 73054 Date 11/25/20

Contractor OKDEQ-Tec-An Type of Work Activity AB Abatement oversight

Time	Daily Log
0950	Arrived on site.
1010	Inspection
1020	Off site

Industrial Hygienist's Signature

11/25/20 @ 10:30
Date/Time

Contractor/Supervisor	License/ID #
Joey Moreno	402331

Worker Name	License/ID #

Field Notes

- Very clean job site;
- Clearances Okay;
- OK DoL inspection-passed.


EXIT

FORMER CITY OF LUTHER TOWN HALL

119 SOUTH MAIN STREET
LUTHER, OK 73054

APRIL 27, 2021 | *LEAD DUST CLEANUP OVERSIGHT*

SERVICES PROVIDED FOR:

ODEQ Land Protection Division
Attention: Katrina Pollard
707 N Robinson Avenue
Oklahoma City, OK 73101
405.702.5112 | katrina.pollard@deq.ok.gov

SERVICES PROVIDED BY:

Marshall Environmental Management, Incorporated
Attention: Jamie Marshall | President
1301 North Martin Luther King Avenue
Oklahoma City, OK 73117
405.616.0401 | mem@marshallenvironmental.com

TABLE OF CONTENTS

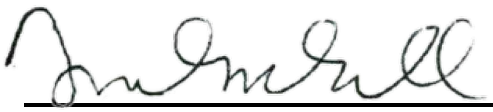
FORMER CITY OF LUTHER TOWN HALL

LEAD DUST CLEANUP OVERSIGHT

CERTIFICATION

This is to certify that Marshall Environmental Management, Incorporated (MEM) was contracted by Katrina Pollard on behalf of Oklahoma Department of Environmental Quality Land Protection Division, to conduct a Lead Dust Cleanup Oversight of the Former City of Luther Town Hall building located at 119 South Main Street in Luther, Oklahoma. These inspections were performed on December 3, 2020 and January 15, 2021, by an LBP Inspector and Risk Assessor certified by the Oklahoma Department of Environmental Quality (ODEQ).

CERTIFIED LEAD-BASED PAINT INSPECTOR/RISK ASSESSORS



April 27, 2021

Jamie Marshall | MS| CIH
President
ODEQ Lead-Based Certification: OKRASR13418

Report Date

CERTIFIED LBP FIRM

Marshall Environmental Management, Inc.
1301 N Martin Luther King Ave.
Oklahoma City, OK 73117
405.616.0401| mem@marshallenvironmental.com
ODEQ Certification – OKFIRM11160

LABORATORY ANALYSES PERFORMED BY:

QuanTEM Laboratories
2033 Heritage Park Drive
Oklahoma City, OK 73120-7502
800.822.1650 | www.quantem.com

SUMMARY

On December 3, 2020 and January 15, 2021, MEM conducted a lead dust clearance inspection associated with the lead dust cleanup of the 2nd Floor Room 3 of the Former City of Luther Town Hall located at 119 South Main Street in Luther, Oklahoma. Subsequently, the lead concentrations detected in the dust wipes samples collected from the floors with Room 3 of the second floor exceeded the Environmental Protection Agency (EPA) Lead Action Level for interior floors of target housing. Due to the elevated readings, the wood floor was sealed by the abatement contractor. The analytical data resulting from the survey are believed to reflect the concentration of lead dust that were present at the time of these inspections. The correlating analytical data, floorplan diagrams and photographs and applicable certifications/licensures are included as an attachment to this report. The remainder of this report includes the Analytical Findings, Disclosure Statement, Legal Obligation as well as information regarding LBP.

HISTORICAL OVERVIEW OF PROPERTY & LEAD-BASED PAINT ACTIVITIES

The Former City Luther Town Hall is a two-story loft located at 119 South Main Street in Luther, Oklahoma was constructed circa 1928. The LBP and Settled Dust Survey (SDS) conducted in 2020 revealed no LBP was detected in various interior and exterior building components tested. Alternatively, the lead dust concentrations detected within the Machine Shop on the first floor and the Room 3 on the second floor exceeded the EPA Lead Dust Action Level for target housing. The elevated surface lead dust concentrations detected within the Machine Shop of the building is mostly due to the painting or mechanical operations that previously occurred within the shop. The concentrations of surface dust within the Machine Shop and second Floor Room 3 are indicative of lead dust contamination.

LEAD DUST SURFACE CLEARANCE SAMPLING

Following the completion of the settled dust cleanup, clearance samples were also collected of settled dust throughout the building. These samples were collected with a Lead Wipe that meets ASTM E1792 specifications utilizing a template. Utilizing disposable gloves, the wipe was used to sample the floor firmly at an upper corner of the template to make "S"-like motions across the entire one square-foot (1-ft^2) template. The wipe was folded in half, keeping the dirty side in, and the wiping procedure was repeated in the original direction in a forward and back motion. The wipe filter was folded again, and the wiping procedure was repeated, concentrating on collecting dust from the edges and corners of the sample area. The wipe filter was folded and placed inside the polyethylene capped tube for laboratory analysis. According to the EPA, settled dust collected from interior floor surfaces that contains lead in concentrations greater than 10-micrograms per-square-foot (>10-µg/ft^2), >100-µg/ft^2 for interior windowsills and >400-µg/ft^2 for window troughs and all other exterior surfaces, are defined as LBP hazards.

OBSERVATIONS AND ANALYTICAL FINDINGS

To determine if the room was adequately cleaned of lead-laden dust, clearance samples were collected within the area of concern, 2nd Floor Room 3. Samples were initially collected following the first cleaning within the area of concern on December 3, 2020. Due to the elevated concentrations detected on the floors, recleaning occurred with supplemental sampling on January 15, 2021. Again, the lead-dust concentrations on the floor still exceeded the guidance levels of 10-µg/ft^2, therefore the wood floors were sealed to alleviate and remaining lead-laden dust. The analytical data for the samples collected are included in the Appendix to this Report. The results for all the sampled locations and the concentrations detected are reported in Table I-Table II below.

TABLE I: 01/15/2021 SURFACE LEAD DUST ANALYTICAL SUMMARY

LAB ID	ROOM EQUIVALENT	BUILDING COMPONENT/LOCATION	RESULTS	ACTION LEVEL
001	2nd FLOOR – ROOM 3	FLOOR - NORTH	180-µg/ft^2	10-µg/ft^2
002	2nd FLOOR – ROOM 3	FLOOR - CENTER	19-µg/ft^2	10-µg/ft^2
003	2nd FLOOR – ROOM 3	FLOOR - SOUTH	13-µg/ft^2	10-µg/ft^2
004	FIELD BLANK	FIELD BLANK	<5.0-µg/ft^2	10-µg/ft^2

µg/ft.^{2} MICROGRAMS PER SQUARE FOOT

TABLE II: 12/03/2020 SURFACE LEAD DUST ANALYTICAL SUMMARY

LAB ID	ROOM EQUIVALENT	BUILDING COMPONENT/LOCATION	RESULTS	ACTION LEVEL
001	2nd FLOOR – ROOM 3	FLOOR - NORTH	35-µg/ft^2	10-µg/ft^2
002	2nd FLOOR – ROOM 3	FLOOR - CENTER	24-µg/ft^2	10-µg/ft^2
003	2nd FLOOR – ROOM 3	FLOOR - SOUTH	35-µg/ft^2	10-µg/ft^2

DISCLAIMER & STANDARD OF CARE

Although paint on various surfaces may not contain lead in concentrations that exceed the federal standard, a hazard could be presented if painted surfaces are disturbed. Occupational Safety and Health Administration (OSHA) regulations covering worker safety and health may apply when painted surfaces, lead-based paint or not, are disturbed The EPA pre-renovation rule requires that the contractor provide a copy of the booklet Protect Your Family from Lead in Your Home or Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools for any renovation that disturbs more than 2-square feet (2-ft2) of painted surface in a facility built before 1978. Furthermore, if renovation of any kind takes place the contractor should provide a copy of Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools. The analytical results associated with this testing are only applicable on the date(s) indicated. Future activities may alter the results.

DISCLOSURE STATEMENT AND OWNERS' LEGAL OBLIGATION

Under Federal law (24 CFR Part 35 and 40 CFR Part 745), this may require disclosure and be made available to prospective tenants before becoming obligated under a lease or sales contract where LBP is present. However, under federal law **even if no LBP is identified** the owner is still required to fulfill certain legal responsibilities when the property is sold, not leased. Property owners and sellers are also required to distribute an educational pamphlet and include standard warning language in their leases or sales contracts to ensure that information is provided in order to protect children from LBP hazards.

Information regarding the legal obligation to disclose results associated with LBP inspections and/or risk assessments to tenants and/or purchasers can be obtained from the National Lead Information Center Clearinghouse (1-800-424-LEAD). This information is specified in 24 CFR Part 35 and 40 CFR Part 745 (published in the *Federal Register*, Volume 61, Number 45, April 6, 1996, beginning on p. 9064).

APPENDIX

LABORATORY ANALYTICAL DATA

AREA DIAGRAM

CERTIFICATION/LICENSURE

LEAD CHAIN OF CUSTODY

QuanTEM LABORATORIES
www.QuanTEM.com
2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only	
Lab No.	330357
	Accept / Reject

Contact Information			
Company: MEM		Phone:	
Contact: Jamie Marshall II		Cell Phone: 405-361-8138	
Account #:		E-mail:	
SAMPLED BY:	Name: Jamie Marshall II	Date: 1/15/21	

Project Information	
Project Name:	0268-LBP-111620
Project Location:	
Project ID:	
P.O. Number:	

Report Results (☑ one box)	
○	QuanTEM Website
✓	Email
○	Other

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
	1/15/21 1220	Hand	M. Hudson	1/15 @ 12:30

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

No.	Sample ID (10 Characters Max)	Sample Description	Volume or Area	Flame Atomic Absorption EPA 7000B: Paint Chips (○ wt% ○ ppm ○ mg/cm²)	Bulk (mg/kg)	Soil (mg/kg)	NIOSH 7082: Wipes (ug/ft²)	Air (µg /m³)	Other Analysis: TCLP - Pb	TCLP - RCRA 8	RCRA 8	Other
1	1	Room 3 2nd Floor Floor East	144 in²				/					
2	2	Floor Center	↓				↓					
3	3	Floor West	↓				↓					
4	4	Blank	N/A				↓					
5												
6												
7												
8												
9												
10												
11												

TURNAROUND TIME	
○	Same Day
○	24 - Hour
○	3 - Day
✓	5 - Day

SATURDAY FEDEX SAMPLE DELIVERY - CALL TO SCHEDULE • Use this address for Saturday Delivery only: 4220 N. Santa Fe Ave., Oklahoma City, OK 73105-8517 • Mark Package "Hold for Saturday Pickup"
Please Note - UPS and USPS are NOT available for Saturday Delivery

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

Environmental Chemistry Analysis Report

QuanTEM Set ID: 330357
Date Received: 01/15/21
Received By: Courtney Holman
Date Sampled:
Time Sampled:
Analyst: CR
Date of Report: 01/21/21

AIHA-LAP, LLC: 101352

Client: Marshall Environmental Management, Inc.
1301 N. MLK Ave
Oklahoma City, OK 73117

Acct. No.: A331

Project: 0268-LBP-111620
Location: N/A
Project No.: N/A

QuanTEM ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
001	1	Wipe	Lead	180	5	ug/sq. Ft.	01/21/21 12:14	NIOSH 7082
002	2	Wipe	Lead	19	5	ug/sq. Ft.	01/21/21 12:14	NIOSH 7082
003	3	Wipe	Lead	13	5	ug/sq. Ft.	01/21/21 12:14	NIOSH 7082
004	4	Wipe	Lead	<5.0	5	ug/sq. Ft.	01/21/21 12:14	NIOSH 7082

Authorized Signature: Cherry Rossen

Cherry Rossen, Technical Manager

Note: Sample results have not been corrected for blank values.

This report applies only to the standards or procedures indicated and to the specific samples tested. It is not indicative of the qualities of apparently identical or similar products or procedures, nor does it represent an ongoing assurance program unless so noted. These reports are for the exclusive use of the client and are not to be reproduced without specific written permission. QuanTEM is not responsible for user-supplied data used in calculations. Customer provided data such as volumes, areas, etc., cannot be verified by QuanTEM Laboratories, LLC.

Unless otherwise noted, upon receipt the condition of the sample was acceptable for analysis.

Wipe materials must meet ASTM E1792 criteria. Method detection limits and resultant reporting limits may not be valid for non-ASTM E1792 wipe material.

EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified

LEAD CHAIN OF CUSTODY

QuanTEM LABORATORIES
www.QuanTEM.com
2033 Heritage Park Drive, Oklahoma City, OK 73120-7502
(800) 822-1650 • (405) 755-7272 • Fax: (405) 755-2058

LEGAL DOCUMENT - PLEASE PRINT LEGIBLY

For Lab Use Only
Lab No. 329695
(Accept) Reject

Contact Information		Project Information	Report Results (☑ one box)
Company: Marshall Environmental	Phone:	Project Name: Luther Town Hall	○ QuanTEM Website
Contact: Jamie Marshall	Cell Phone: 405361/8138	Project Location:	◉ Email _____
Account #:	E-mail:	Project ID:	○ Other _____
SAMPLED BY: Name:	Date:	P.O. Number:	

RELINQUISHED BY	DATE & TIME	VIA	RECEIVED BY	DATE & TIME
Jon Marshall	12/15/20	Hand	Chase Collins	12/15/20 2:00pm

REQUESTED SERVICES (Please ☑ the Appropriate Boxes)

No.	Sample ID (10 Characters Max)	Sample Description	Volume or Area	Flame Atomic Absorption EPA 7000B: Paint Chips (○ wt% ○ ppm ○ mg/cm²)	Bulk (mg/kg)	Soil (mg/kg)	NIOSH 7082: Wipes (ug/ft²)	Air (µg/m³)	Other Analysis: TCLP - Pb	TCLP - RCRA 8	RCRA 8	Other
1	1	Rm 3 2nd Floor - North	144in²				✓					
2	2	- Center	↓				↓					
3	3	- South	↓				↓					
4												
5												
6												
7												
8												
9												
10												
11												

TURNAROUND TIME
○ Same Day
◉ 24 - Hour
○ 3 - Day
○ 5 - Day

SATURDAY FEDEX SAMPLE DELIVERY - CALL TO SCHEDULE • Use this address for Saturday Delivery only: 4220 N. Santa Fe Ave., Oklahoma City, OK 73105-8517 • Mark Package "Hold for Saturday Pickup"
Please Note - UPS and USPS are NOT available for Saturday Delivery

QUANTEM LABORATORIES
2033 HERITAGE PARK DR, OKLAHOMA CITY, OK 73120 | 1.800.822.1650

Environmental Chemistry Analysis Report

QuanTEM Set ID: 329695
Date Received: 12/15/20
Received By: Chloe Collins
Date Sampled:
Time Sampled:
Analyst: CR
Date of Report: 12/16/20

AIHA-LAP, LLC: 101352

Client: Marshall Environmental Management, Inc.
1301 N. MLK Ave
Oklahoma City, OK 73117

Acct. No.: A331

Project: Luther Town Hall
Location: N/A
Project No.: N/A

QuanTEM ID	Client ID	Matrix	Parameter	Results	Reporting Limits	Units	Date/Time Analyzed	Method
001	1	Wipe	Lead	35	5	ug/sq. Ft.	12/16/20 13:39	NIOSH 7082
002	2	Wipe	Lead	24	5	ug/sq. Ft.	12/16/20 13:39	NIOSH 7082
003	3	Wipe	Lead	35	5	ug/sq. Ft.	12/16/20 13:39	NIOSH 7082

Authorized Signature: Cherry Rossen

Cherry Rossen, Technical Manager

Note: Sample results have not been corrected for blank values.

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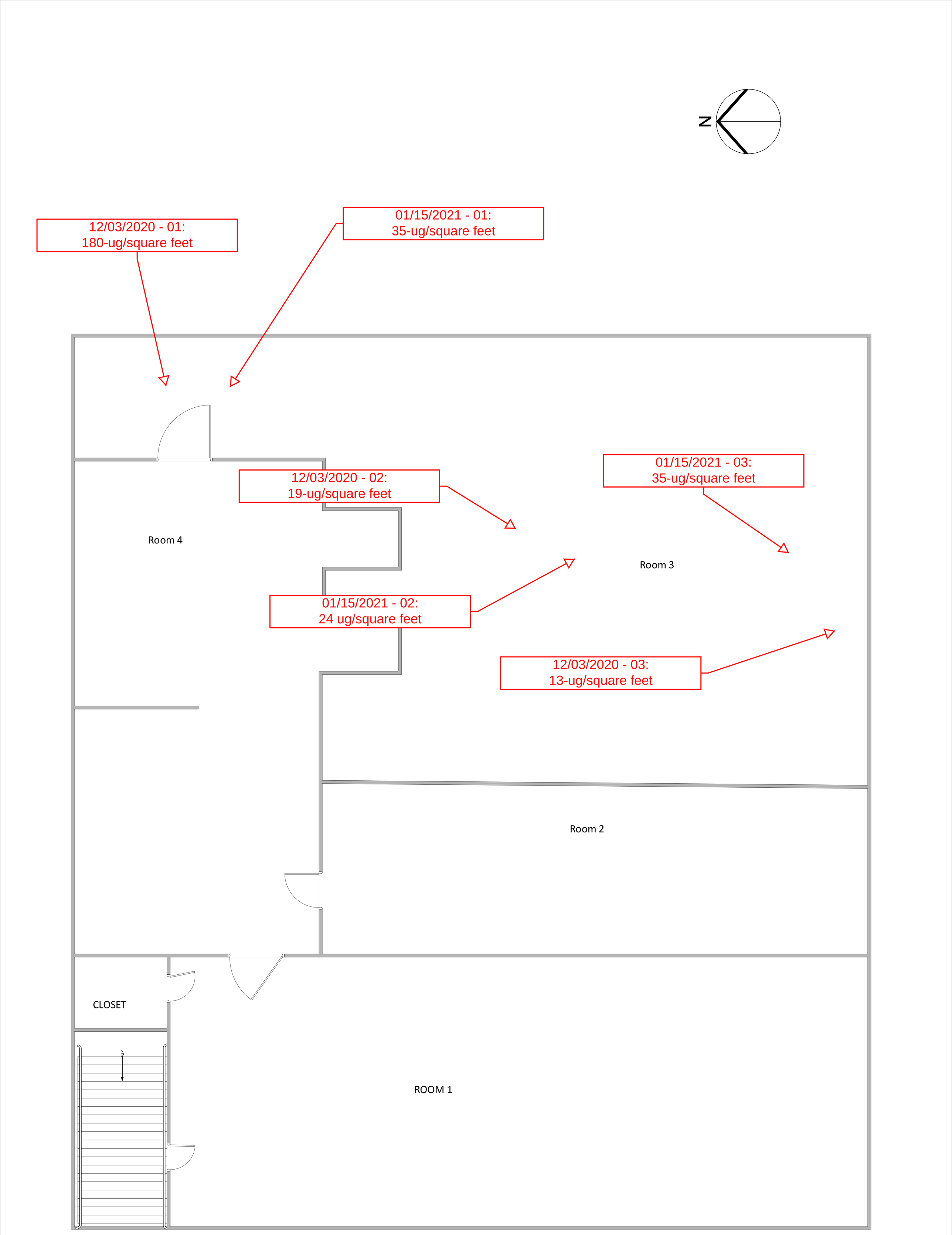
EPA Method 7000B (1) = EPA 600/R-93/200 Preparation Modified. EPA 7000B Analysis Modified

EPA Method 7082 (2) = EPA 600/R-93/200 Preparation Modified. EPA 7082 Analysis Modified



MAP IS NOT TO SCALE

MARSHALL ENVIRONMENTAL MANAGEMENT

SECOND FLOOR – LEAD-DUST CLEARANCE LOCATIONS

CITY OF LUTHER FORMER TOWN HALL
119 SOUTH MAIN STREET
LUTHER, OK 73054

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FIGURE


ENERGYGUIDE