

STATE OF NEW YORK
DEPARTMENT OF LABOR
STATE OFFICE BUILDING CAMPUS
ALBANY, NEW YORK 12226-0100

Variance Petition

of

LaBella Associates
Petitioner's Agent

On Behalf of

Rochester Housing Authority
Petitioner

in re

Premises: 56 Holland Street
Rochester, NY 14605

Apartment Incidental Disturbance Cleanup

File No. SH-63B1G

DECISION

Cases 1- 4

ICR 56

The Petitioner, pursuant to Section 30 of the Labor Law, having filed Petition No. SH-63B1G on August 23, 2024 with the Commissioner of Labor for a variance from the provisions of Industrial Code Rule 56 as hereinafter cited on the grounds that there are practical difficulties or unnecessary hardship in carrying out the provisions of said Rule; and the Commissioner of Labor having reviewed the submission of the petitioner dated August 23, 2024; and

Upon considering the merits of the alleged practical difficulties or unnecessary hardship and upon the record herein, the Commissioner of Labor does hereby take the following actions:

Case No. 1	ICR 56-6.2
Case No. 2	ICR 56-7.10
Case No. 3	ICR 56-7.11(e)
Case No. 4	ICR 56-11.2(f)(4)

VARIANCE GRANTED. The Petitioner's proposal for removal and proper disposal of ACM (5,000 SF) and contaminated components in the partially burnt apartment at the subject premises in accordance with the attached 40-page stamped copy of the Petitioner's submittal is accepted; subject to the Conditions noted below:

THE CONDITIONS

Full-Time Project Monitor:

1. A full-time independent project monitor (PM) shall be on site and is responsible for oversight of the abatement contractor during all abatement activities to ensure compliance with ICR 56 requirements including but not limited to ICR 56-3.2(d)(8) and variance conditions.
2. In addition, the PM shall ensure that no visible emissions are generated during abatement activities. If visible emissions are observed, work practices shall be altered according to the PM's recommendations.
3. The PM shall perform the following functions during asbestos abatement projects in addition to functions already required by ICR-56:
 - a. Inspection of the interior of the asbestos project work area made at least twice every work shift accompanied by the Asbestos Supervisor.
 - b. Observe and monitor the activities of the asbestos abatement contractor to determine that proper work practices are used comply all applicable asbestos laws and regulations.
 - c. Inform the asbestos abatement contractor of work practices that, in the PM's opinion, pose a threat to public health or the environment, and are not in compliance with ICR-56 and/or approved variances or other applicable asbestos rules and/or regulations.
 - d. Document in the Project Monitor Log observations and recommendations made to the Asbestos Supervisor based upon the interior/exterior observations of the asbestos project made by the PM.
 - e. Duties specified in variances issued for the project.
4. The PM shall alert the local District Office of the NYSDOL Asbestos Control Bureau whenever, after the PM has provided recommendations to the Asbestos Supervisor, unresolved conditions remain at the asbestos project site which present a significant potential to adversely affect human health or the environment.
5. The PM is not onsite to direct the abatement workers in their work. That is the responsibly of the Contractor's designated Supervisor. The ultimate caliber of work performance and quality of the completed project is the responsibility of the contractor who performs the work.

6. The PM is not responsible for enforcing Local, State, Industry, or Federal regulations, rules or codes which are not directly applicable to the contracted asbestos abatement activities. These would include, but not limited to, fire codes, electrical codes, building codes, wage rates schedules, etc. While the PM is not responsible for enforcement of these items, the Contractor is still responsible for compliance with such requirements as applicable.
7. The PM is responsible for any duties specified in his/her contract with the Owner.
8. All generated waste removed from the site must be documented, accounted for, and disposed of in compliance with the requirements of NESHAPS and NYSDEC.

Establishment of Restricted Area:

9. The regulated abatement work areas, decontamination units, airlocks, and dumpster areas shall be cordoned off at a distance of twenty-five (25) feet and shall remain vacated except for certified workers until satisfactory clearance air monitoring results have been achieved or the abatement project is complete.
10. For areas where compliance with the twenty-five feet barrier/fence requirement isn't possible, the areas shall be cordoned off to the maximum distance possible, and a daily abatement air sample shall be included at the reduced barrier.

Debris Cleanup and Friable Removals:

11. Once the regulated abatement work area is occupied by the abatement contractor, the asbestos project begins and PPE shall be worn at all times even during Preparation.
12. A personal decontamination enclosure system that complies with Subpart 56-7.5 shall be utilized. A waste decontamination enclosure system that fully complies with Subpart 56-7.5 shall be utilized. These enclosure systems **must be attached (contiguous)** to the regulated abatement work area and shall be removed only after satisfactory clearance air monitoring results have been achieved for the regulated abatement work area.
13. The floors, walls, ceilings, fixtures, and movable and fixed objects contaminated with asbestos debris shall be cleaned as part of this abatement project.
14. Prior to removal of ACM debris, installation of critical barriers as per ICR 56-7.11 (a) and establishment of negative air as per ICR 56-7.8 shall be completed. All visible accumulations of ACM in the area of the critical

barriers shall be cleaned as per ICR 56-7.10 (c)(1) prior to installation of the barriers.

15. A minimum of 8 air changes per hour must be observed once the negative air has been established. A minimum four-hour pre-abatement settling period as per 56-8.2(b) shall elapse once the negative air has been established.
16. One layer of 6-mil fire retardant plastic sheeting shall be used as a dropcloth below ACM removal locations. The dropcloth may be limited to beneath the immediate removal locations and the surrounding ten (10) feet.
17. Installation of wall and ceiling plastic sheeting is not required where existing non-porous cleanable wall and ceiling surfaces are located within the work area, and not required for surfaces that are potentially contaminated and shall be cleaned as part of the asbestos project.
18. Potentially contaminated personal items that the tenants wish to keep must be HEPA vacuumed and wet wiped prior to being placed in 6-mil transparent bags. The Contractor shall inform the tenants of the potential asbestos exposure from the items and possible health implications. The Contractor shall record in the project log which items the tenant decided to retain, and the tenant shall sign the log confirming the items they chose to keep.
19. Encapsulation of any asbestos removal surfaces shall not be performed until satisfactory clearance air sample results have been obtained.
20. The contractor shall observe, at a minimum, eight-hour waiting (settling/drying) periods.
21. When relief is granted to not plasticize or when a tent/enclosure unit is used, one thorough cleaning as described in ICR 56-9.1(e) and one settling, waiting period shall suffice, except when an air test fails.
22. After a minimum waiting/drying period has elapsed, the Project Monitor shall determine if the area is dry and free of visible asbestos debris as per 56-9.1(d1). If the area is determined to be acceptable, the Project Monitor may authorize clearance air sampling to be performed in accordance with ICR 56-9.2(d).
23. After abatement of the asbestos and asbestos debris, all plastic sheeting and tape will be treated as contaminated material and properly disposed of as asbestos waste at the end of the project.
24. Usage of this variance is limited to those asbestos removals identified in this variance or as outlined in the Petitioner's proposal.

In addition to the conditions required by the above specific variances, the Petitioner shall also comply with the following general conditions:

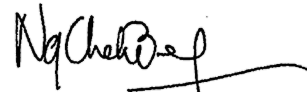
GENERAL CONDITIONS

1. A copy of this DECISION and the Petitioner's proposals shall be conspicuously displayed at the entrance to the personal decontamination enclosure.
2. This DECISION shall apply only to the removal of asbestos-containing materials from the aforementioned areas of the subject premises.
3. The Petitioner shall comply with all other applicable provisions of Industrial Code Rule 56-1 through 56-12.
4. The NYS Department of Labor Engineering Service Unit retains full authority to interpret this variance for compliance herewith and for compliance with Labor Law Article 30. Any deviation to the conditions leading to this variance shall render this variance Null and Void pursuant to 12NYCRR 56-12.2. Any questions regarding the conditions supporting the need for this variance and/or regarding compliance hereto must be directed to the Engineering Services Unit for clarification.
5. This DECISION shall terminate on August 31, 2025.

Date: August 26, 2024

ROBERTA REARDON
COMMISSIONER OF LABOR

By



Chek Beng Ng, P.E.
Professional Engineer 2 (Industrial)

PREPARED BY: Chek Beng Ng, P.E.
Professional Engineer 2 (Industrial)

REVIEWED BY: Demissie Woyecha, P.E.
Professional Engineer 1 (Industrial)

Location: 56 Holland Street, Rochester, New York

Work Area: Apartment

Pertinent Site/Work Area Information

Rochester Housing Authority (RHA) is planning on renovating a vacant apartment unit at 56 Holland Street in Rochester, New York. The unit had a fire break out on the upper level, which affected gypsum board systems in an upper level bedroom, the upper level hallway, and the living room. In preparation for the renovations, LaBella Associates, D.P.C. (LaBella) performed a regulated building materials (RBM) inspection and identified asbestos-containing materials (ACM) throughout the unit. The sampling conducted by LaBella was limited to those materials understood to be impacted by the upcoming renovations, as identified by RHA. The basement of the unit was not included in this inspection as it was not impacted by the fire and will not be included in renovation efforts. All of the ACMs identified as part of this inspection are non-friable, but may be rendered friable during the planned renovations. The following table is not meant to represent all of the ACMs present within the structure, only those understood to be impacted by the renovations. The following ACMs are present:

56 Holland Street				
Type of Material	General Location	Category	Condition	Estimated Quantity
White Joint Compound and White Ceiling Stucco Debris	Living Room, Upper Level Hallway, and Bedroom	Category I Friable	Poor	2,350 SF
White Joint Compound	Walls and Ceilings Throughout Apartment Unit	Category II Non-Friable*	Fair	3,950 SF
White Ceiling Stucco	Ceilings Throughout Apartment Unit	Category II Non-Friable*	Fair	950 SF

*This material is considered to be non-friable in its current, intact condition. However, this material has the potential to become friable during any renovation activities that will disturb the material.

LaBella, on behalf of RHA, is petitioning to remove all friable ACM debris and portions of the non-friable ACM prior to cleaning all cleanable surfaces within the unit. For clean-up purposes, all areas within the unit shall be considered contaminated with ACM debris (approximately 5,000 SF). Any and all contents within this space shall be decontaminated and cleaned prior to removal from the work area or disposed of as asbestos-containing waste. Additionally, since the entire work area will be under negative pressure, the petitioner is proposing to remove portions of the remaining intact ACMs within the space to prepare the unit for new construction. This will result in the abatement of approximately 360 SF of gypsum board ceiling systems, 330 SF of gypsum board wall systems, and the associated asbestos-containing joint compound and stucco. We are requesting the following procedures for this work:

ICR 56 Relief Sought

Code Rule 56 Section	Title	Hardship
56-6.2	Number and Location of Background Air Samples	See Below
56-7.10	Regulated Abatement Work Area Pre-Cleaning	
56-7.11(e)	Regulated Abatement Work Area Enclosure – Floor, Wall, and Ceiling Plasticizing and Sealing	
56-11.2(f)(4)	Emergency Projects – Corrective Actions for Incidental Disturbance of Asbestos Containing Materials	

56-6.2: As this work involves the clean-up of asbestos-containing debris throughout the unit, background air sampling shall not be required.

56-7.10: Pre-cleaning the work area is impractical due to the fact that all surfaces within the work area are considered contaminated and will be cleaned prior to final aggressive air clearance testing.

56-7.11(e): Plasticizing and sealing all surfaces shall not be required. All surfaces are considered contaminated and shall be decontaminated as part of the clean-up/abatement project.

56-11.2(f)(4): New gypsum board systems are being installed in the areas with the worst fire damage, and the existing damaged gypsum board systems need to be removed. Since the entire space will be under negative pressure, it would be an inefficient use of the owner's resources not to abate the materials necessary for the planned renovations.

Proposed Abatement Method Description

Removal and handling of the ACM shall be performed in accordance with this approved variance and all other applicable provisions of ICR 56. These procedures are as follows:

Full-Time Project Monitor

1. A full time New York State asbestos-certified project monitor (PM) shall be on site and responsible for the oversight of the abatement contractor during all abatement activities to ensure compliance with ICR 56 requirements including but not limited to ICR 56-3.2(d)(8) and variance conditions.
2. In addition, the PM shall ensure that no visible emissions are generated during abatement activities. If visible emissions are observed, work practices shall be altered according to the PM's recommendations.
3. The project monitor shall perform the following functions during asbestos abatement projects in addition to functions already required by ICR-56:
 - a. Inspection of the interior of the asbestos project work area made at least twice every work shift accompanied by the Asbestos Supervisor;
 - b. Observe and monitor the activities of the asbestos abatement contractor to determine that proper work practices are used and are in compliance with all asbestos laws and regulations;
 - c. Inform the asbestos abatement contractor of work practices that, in the Project Monitor's opinion, pose a threat to public health or the environment, and are not in compliance with ICR 56 and/or approved variances or other applicable rules and/or regulations;
 - d. Document in the Project Monitor Log observations and recommendations made to the Asbestos Supervisor based upon the inter/exterior observations of the asbestos project made by the PM.
4. The PM shall alert the nearest District Office of the NYSDOL Asbestos Control Bureau whenever, after the PM has provided recommendations to the Asbestos Supervisor, unresolved conditions remain at the asbestos project which present a significant potential to adversely affect human health or the environment.
5. The PM is not onsite to direct the abatement workers in their work. That is the responsibility of the Contractor's designated Supervisor. The ultimate caliber of work performance and quality of the completed project is the responsibility of the contractor who performs the work.
6. The PM is not responsible for enforcing Local, State, Industry, or Federal regulations, rules, or codes which are not directly applicable to the contracted asbestos abatement activities. These would include, but not be limited to, fire codes, electrical codes, building codes, wage rates, schedules, etc. While the PM is not responsible for the enforcement of these items, the Contractor is still responsible for compliance with such requirements as applicable.
7. The PM is responsible for any duties specified in his/her contract with the Owner.

8. All generated waste removed from the site must be documented, accounted for, and disposed of in compliance with the requirements of NESHAPS and NYSDEC.
9. Usage of this variance is limited to those asbestos removals identified in this variance or as outlined in the Petitioner's proposal.

Establishment of Regulated Areas

10. The regulated work areas, decontamination units, airlocks, and dumpster areas shall be cordoned off at a distance of twenty-five feet (25') where possible and shall remain vacated except for certified workers until satisfactory clearance air monitoring results have been achieved or the abatement project is complete. These areas shall have Signage posted in accordance with Subpart 56-7.4(c) of Code Rule. For areas where twenty-five feet isn't possible, the areas shall be cordoned off as practical, and a daily abatement air sample shall be taken at the barrier.

Unit Debris Cleanup

11. Air sampling and analysis shall be conducted in accordance with the requirements of Subpart 56-4, except no background air samples shall be required as per 56-11.2(f)(3).
12. Decontamination system enclosures and areas shall be constructed and utilized as per the requirements of 56-7.5(d).
13. Once the regulated abatement work is occupied by the abatement contractor, personal protective equipment (PPE) shall be worn as part of the Supervisor's instructions in accordance with OSHA asbestos regulations. The Supervisor shall assess the need for the type of PPE required.
14. A personal decontamination unit that complies with Subpart 56-7.5 shall be utilized. A waste decontamination enclosure system that fully complies with Subpart 56-7.5 shall be utilized. These enclosure systems **must be attached (contiguous)** to the regulated abatement work area and shall be removed only after satisfactory clearance air monitoring results have been achieved for the regulated abatement work. Where physical spaces restrictions limit the decontamination enclosure systems, a small decontamination enclosure system may be utilized in compliance with ICR 56-7.5 (c) & 56-7.5(e)(9).
15. Prior to removal of ACM debris, installation of critical barriers as per ICR 56-7.11 (a) and establishment of negative air as per ICR 56-7.8 shall be completed. All visible accumulations of ACM in the area of the critical barriers shall be cleaned as per ICR 56-7.10(c)(1) prior to the installation of the barriers.
16. Two-layer six-mil fire retardant plastic sheeting may be used as critical barriers/isolation barriers in lieu of temporary hard wall barriers normally required as per ICR 56-7.11(b). These plastic sheeting isolation barriers shall be adequately supported for the duration of the asbestos project. All critical barriers and isolation barriers shall remain in place until receipt of satisfactory clearance air results for the regulated abatement work area.

17. Installation of wall and ceiling plastic sheeting is not required where existing non-porous cleanable wall and ceiling surfaces are located within the work area, and not required for surfaces that are potentially contaminated and shall be cleaned as part of the asbestos project.
18. A minimum of 8 air changes per hour must be observed once the negative air has been established. A minimum of four-hour pre-abatement settling period as per ICR 56-8.2(b) shall elapse once the negative air has been established.
19. The floors, walls, ceilings, fixtures, movable, and fixed objects contaminated with asbestos debris shall be cleaned as part of this asbestos project. All potentially contaminated porous materials shall be removed from the work area and disposed of as contaminated waste.
20. Once all movable objects within the work area have been decontaminated and removed, or disposed of as an RACM, a thorough clean of the work area shall be conducted prior to the abatement of the remaining, intact ACMs. The abatement contractor shall refer to the construction documents and coordinate with the general contractor (GC) for any items to be salvaged within the work area.
21. For the removal of the remaining ACM, one layer of 6-mil fire-retardant plastic sheeting shall be used as a drop cloth below ACM removal locations. The drop cloth may be limited to beneath the immediate removal locations and the surrounding ten feet.

Cleaning and Clearance

22. Encapsulation of any asbestos removal surfaces shall not be performed until satisfactory clearance air sample results have been obtained.
23. The contractor shall observe, at a minimum, twelve-hour waiting (settling/drying) periods.
24. After removal and cleanings are complete and a minimum drying period has elapsed, an authorized and qualified Project Monitor shall determine if the area is dry, the scope of work complete, and the work area free of visible asbestos debris/residue. If the area is determined to be acceptable and the final clearance air samples results meet 56-4.11 clearance criteria, the final dismantling of the site may begin.
25. As full plasticization is not required, one thorough cleaning as per 56-11.2(f)(8) and one twelve-hour settling/waiting period shall suffice, except if clearance air sampling is unsatisfactory, then a re-cleaning of the area and another settling/waiting period is required.
26. After abatement of the asbestos and asbestos debris, all plastic sheeting and tape will be treated as contaminated material and properly disposed of as asbestos waste at the end of the project.
27. Usage of this variance is limited to those asbestos removals identified in this variance or as outlined in the Petitioner's proposal.

Comprehensive Regulated Building Materials Inspection

Location:

Holland Townhouses – Unit 56
56 Holland Street
Rochester, New York 14605

Prepared for:

Rochester Housing Authority
495 Upper Falls Boulevard
Rochester, New York 14605

LaBella Project No.

2242439

June 18, 2024

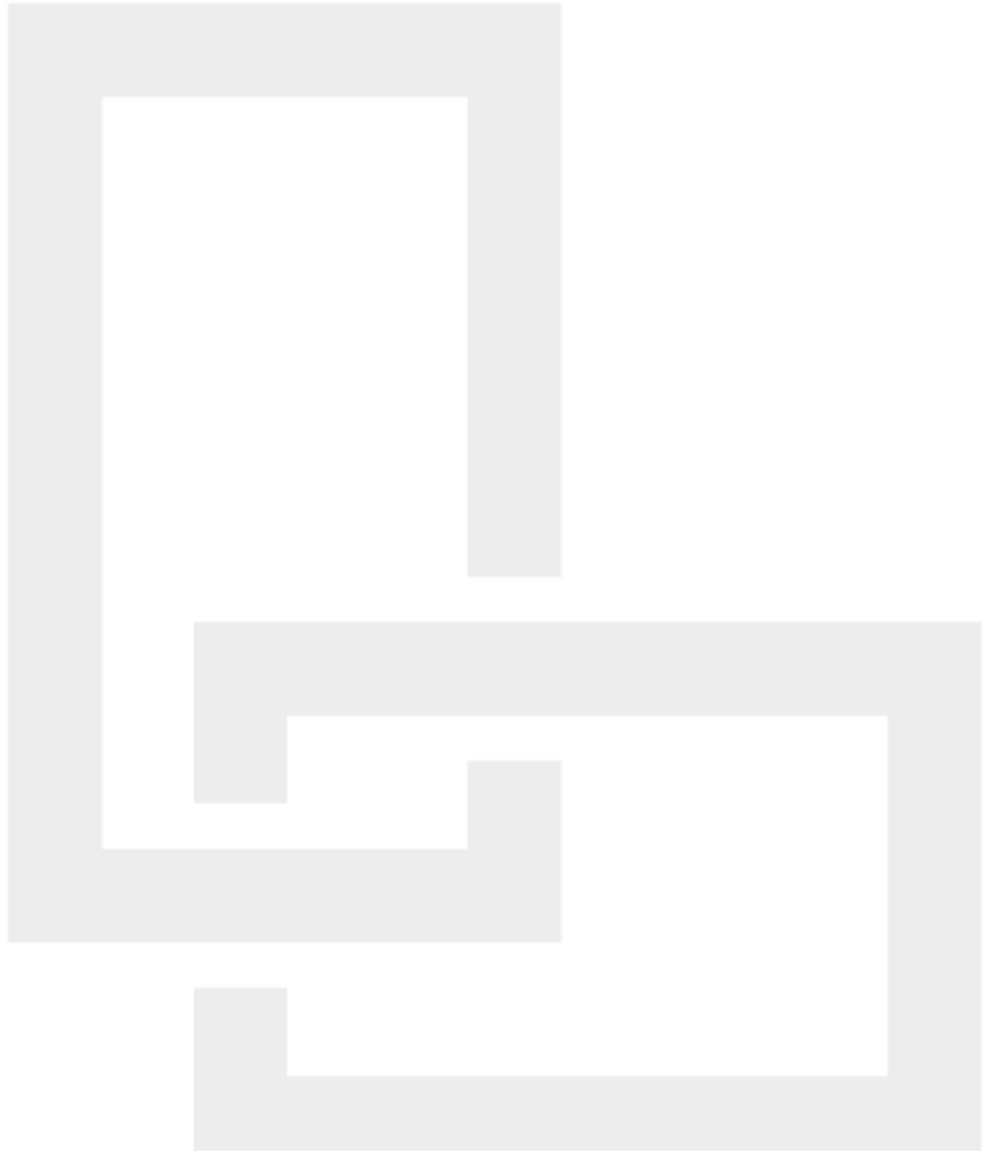


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1.0 PROJECT DESCRIPTION

In accordance with current regulations, LaBella Associates, D.P.C. (LaBella) conducted a Limited Pre-Renovation Regulated Building Materials (RBM) Inspection in Unit 56 of the Holland Townhouses located in Rochester, New York. The objective was to identify suspect RBMs, such as Asbestos-Containing Materials (ACM), Lead-Based Paint (LBP), PCB-containing materials and equipment, and Mercury-containing equipment (MCE) that may require abatement or removal prior to or during renovation activities due to applicable regulations.

The areas inspected were limited to the interior spaces of Unit 56 that are expected to be impacted during an upcoming renovation project. Materials and locations understood to be impacted by this project were determined from information provided by Rochester Housing Authority.

2.0 INSPECTION PROCEDURES

The following procedures were used to obtain the data for this Report:

- A. Existing documentation was requested for review. No record drawings or documentation of previously completed inspections were made available.
- B. A visual inspection of the interior spaces of Unit 56 was conducted to identify visible and accessible sources of suspect RBMs. Photographs captured during this inspection are attached in Appendix C.
- C. Bulk samples of accessible suspect materials were collected and submitted for laboratory analysis.
- D. Asbestos samples were submitted for laboratory analysis. Preliminary Polarized Light Microscopy analyses were performed by LaBella Laboratories, a NYSDOH accredited laboratory, to determine the presence and percentage of asbestos in each sample. Transmission electron microscopy analyses of NOB materials, if necessary, were performed by AMA Laboratories.
- E. Suspect painted or glazed materials were spot checked in the field using X-Ray Fluorescence (XRF) testing procedures for the presence of lead.
- F. Results of the laboratory analyses, field testing and the visual on-site inspection were compiled and summarized.

3.0 INSPECTION LIMITATIONS

This inspection was conducted in accordance with generally accepted environmental engineering practices for this region. Collection of bulk samples of suspect RBMs was limited to those materials readily accessible using hand tools or hand-held power tools. Homogeneous materials were identified and located based on visual observation from readily accessible points. The data derived from representative samples of any given homogeneous material represent conditions that apply only at that particular location. Inspection protocol and methodology requires that sample data be used to draw conclusions about the entire homogeneous area, but such conclusions may not necessarily apply to the general Site as a whole.

No sub-surface investigations were performed to determine the possible presence of regulated materials on or in the immediate vicinity of the Site. No record drawings of the building were available for review as part of this investigation.

LaBella makes no other warranty or representation, either expressed or implied, nor is one intended to be included as part of its services, proposals, contracts, or reports. N inspection can wholly eliminate the

uncertainty regarding the potential for undiscovered RBMs. The Work performed by LaBella is intended to reduce, but not eliminate, uncertainty regarding the potential for RBMs at the Site. This inspection report is not intended to be a bid document for an abatement scope of work. This report is intended to satisfy the requirements of NYS Code Rule 56-5 for inspections.

4.0 INSPECTION RESULTS

4.1 Asbestos-Containing Materials (ACMs)

Based on laboratory analyses of bulk samples collected, the following materials were determined to contain greater than 1% asbestos. However, the following table does not include all of the materials sampled during this inspection; for a full list of materials sampled see the *Asbestos Bulk Sample Summary Table* immediately following this report.

Type of Material	Typical Location	Estimated Amount ¹	Friability	Condition
White Joint Compound	Walls and Ceilings Throughout Apartment Unit ~ See Additional Details Below ~	3,950 SF	Non-Friable*	Fair
White Ceiling Stucco	Ceilings Throughout Apartment Unit ~ See Additional Details Below ~	950 SF	Non-Friable*	Fair

*This material is considered to be non-friable in its current, intact condition. However, this material has the potential to become friable during any renovation/demolition activities that will disturb the material.

ACM Project Specific Details

Joint Compound

White asbestos-containing joint compound is located on the walls and ceilings throughout the inspected unit. Since these surfaces are painted, it is not possible to determine the exact extent and locations of the joint compound. Joint compound is typically used for both taping joints and filling nail indentations in drywall construction.

Therefore, for removal estimating purposes, it is assumed that the joint compound would be removed along with the underlying drywall, which covers an area of approximately 3,950 square feet. This estimate is based on field measurements taken at the time of the site visit.

Additionally, the majority of joint compound within the inspected spaces was observed to be in good condition. However, Rooms 1, 4 and 8 had extensive damage to the wall and ceiling systems caused by a recent fire within the unit. As such, drywall/joint compound debris was observed throughout the impacted spaces.

Special Note: New York State Regulations currently consider this condition to represent an “Incidental Asbestos Disturbance”. See “Section 5.0, Observations and Cautionary Statements” for additional information.

Ceiling Stucco

White asbestos-containing stucco is located on the ceilings throughout the inspected unit. The majority of ceiling stucco within the inspected spaces was observed to be in good condition. However, Rooms 1, 4 and 8 had extensive damage to the wall and ceiling systems caused by a recent fire within the unit. As such, ceiling stucco debris was observed throughout the impacted spaces.

¹ For general reference only: Estimated amounts of confirmed ACM listed above were obtained through field observations made during site visits. Quantities are approximations and LaBella assumes no responsibility if used for bidding.

Special Note: New York State Regulations currently consider this condition to represent an “Incidental Asbestos Disturbance”. See “Section 5.0, Observations and Cautionary Statements” for additional information.

4.2 PCB-Containing Materials and Equipment

Capacitors in Fluorescent Light Fixture Ballasts

Ceiling mounted fluorescent light fixtures were observed in various spaces of the inspected units. Older vintage fluorescent light fixtures manufactured prior to 1980 typically contained a capacitor filled with PCB fluid. A representative number of light fixtures were dismantled and all had ballasts labeled “No PCBs”. Based on these observations made at the time of the site visit, to the extent feasible, the ballasts within the inspection area can be considered to be non-PCB-containing. If non-labeled ballasts are encountered during renovation activities, contractors shall ensure that all components are properly managed and disposed of in accordance with 40 CFR 761.

Caulking and Glazing Compounds

According to the Environmental Protection Agency (EPA), PCB-containing building materials were commonly used in buildings built or renovated between circa 1950 and 1979. Caulking and glazing compounds were often used around windows, door frames, building joints, masonry columns and other masonry building materials. PCBs from manufactured sources (caulk), may also contaminate adjoining materials, such as masonry or wood, through direct contact and create secondary sources.

As such, prior to removal, the EPA recommends testing caulk and other building materials to determine what protections are needed during removal, and to determine proper disposal requirements. Building materials (caulking, sealants, etc.) containing equal to or greater than 50 ppm PCB must be disposed of as PCB-contaminated hazardous waste in accordance with 40 CFR part 761, subpart D.

However, during the site inspection, no suspect PCB-containing materials impacted by the project scope were observed.

4.3 Mercury-Containing Equipment (MCE)

During the inspection, four (4) fluorescent light bulbs were observed in ceiling mounted fluorescent light fixtures in the following locations throughout the inspected unit:

Location	Material Description	Quantity
Kitchen	Fluorescent Light Bulbs	2
Bathroom	Fluorescent Light Bulbs	2

These light bulbs contain varying amounts of mercury vapor. To prevent breakage and the release of mercury, bulbs should be removed and sent to a mercury recycling facility prior to any renovation activities.

No other mercury-containing equipment was identified in the inspected areas.

4.4 Lead – Based Paint (LBP)

Several representative interior painted and glazed surfaces were observed and tested for the presence of lead-based paint using XRF testing procedures. In accordance with Environmental Protection Agency (EPA) protocols, none of the tested surfaces were determined to contain lead above the action level threshold of 1.0 mg/cm². However, additional lead-based materials may exist within the building. Therefore, Contractors shall be responsible for determining the quantity, location and condition of materials not tested during this inspection.

The unit inspected for this project includes spaces applicable to the requirements of EPA 40 Code of Federal Regulations (CFR) 745: Lead-Based Paint Renovation, Repair and Painting (RRP) Program

Rule. The RRP Rule affects any contractor who disturbs known or presumed lead-based paint during any renovation, repair or painting projects in housing, child care facilities, and preschools built before 1978. Any contractor performing renovation work in applicable areas throughout the building must be certified, assign a “certified renovator” to each job where lead-based paint will likely be disturbed, train its renovation workers, distribute the EPA’s Renovate Right lead hazard pamphlet before starting work, and use lead safe work practices.

Additionally, lead was detected at low concentrations in a variety of building materials (i.e., walls, vinyl wall bases, door components, I-Beams). Renovation and demolition contractors should be informed of the presence of lead for OSHA compliance considerations.

For purposes of reading this report, and understanding which wall or component in a particular space was sampled, walls were assigned the letters A, B, C, or D. The wall labeled as “A” is the address side of the building; walls B, C, and D will follow clockwise in succession.

5.0 OBSERVATIONS AND CAUTIONARY STATEMENTS

Incidental Disturbances

As stated earlier, the presence of damaged asbestos-containing materials were noted in several locations throughout the unit. These conditions represent an “Incidental Asbestos Disturbance” as defined by New York State Asbestos Regulations, (i.e., Industrial Code Rule 56). According to these regulations, personnel access to the areas affected shall be restricted until such time as the materials are cleaned up by a licensed asbestos abatement contractor. The clean-up of these materials shall take place as soon as possible.

For contamination cleanup scenarios, the notifiable quantity is the square footage of potentially contaminated surfaces. In addition, any cleanup scenario over a minor size (10 SF), requires a site-specific variance. The following disturbances were noted during the inspection:

- White Joint Compound and White Ceiling Stucco
 - Room 1 – approximately 925 square feet
 - Room 4 – approximately 725 square feet
 - Room 8 – approximately 700 square feet

While on site, the extent of contamination was quantified and assessed in accordance with all New York State Regulations. The certified asbestos inspector used his professional experience, as well as bulk sampling/analysis of the debris/residue, to define the limits of the contamination that must be cleaned up. The data collected during the inspection may be incorporated into a site-specific emergency variance application.

Vermiculite

Vermiculite has been used as loose insulation in attics, walls, CMU block, and as a component of plaster, fireproofing and other building materials. The NYS Department of Health considers loose-fill Vermiculite to be an asbestos-containing material, and that building materials containing Vermiculite should be treated as asbestos-containing until sent for additional analysis and proven negative in accordance with NYS DOH guidelines.

Vermiculite was **not** observed in spaces and materials inspected for this project. However, destructive investigation of wall cavities was not conducted, and therefore the presence or extent of this material’s application throughout the building was not determined. Cautionary measures should be taken during construction, renovation, and demolition to ensure that proper steps are taken if Vermiculite is discovered in previously inaccessible locations. If Vermiculite is discovered, work should be stopped immediately to

address the issue and prevent the uncontrolled release and distribution of an asbestos-containing material.

Potentially Hidden/Inaccessible RBMs

Although this inspection was conducted in a manner consistent with recognized professional practices, the potential does exist for additional RBMs to be located in the following inaccessible areas because of the operational constraints mentioned above:

- Inside wall and/or ceiling cavities
- Exterior of the building
- Electrical components

If future building renovations are to take place, it is recommended that the above areas/materials be re-investigated using destructive sampling techniques as necessary, in order to identify and sample currently hidden/inaccessible suspect RBMs that could potentially be discovered during building renovations.

Asbestos Bulk Sample Summary Table

Asbestos Bulk Sample Summary Table

Comprehensive Regulated Building Materials Inspection
Holland Townhouses
56 Holland Street
Rochester, New York 14605

Items in Bold are Confirmed ACM

Sample #	Type of Material	Sample Location	Results % Asbestos
1A	Brown/Gray Flooring	Room 1, Floor 1 st Layer	None Detected
1B	Brown/Gray Flooring	Room 5, Floor 1 st Layer	None Detected
2A	Tan Streaked 12" Floor Tile	Room 2, Floor 2 nd Layer	None Detected
2B	Tan Streaked 12" Floor Tile	Room 5, Floor 2 nd Layer	None Detected
3A	Tan Floor Tile Mastic	Room 5, Floor 2 nd Layer	None Detected
3B	Tan Floor Tile Mastic	Room 6, Floor 2 nd Layer	None Detected
4A	Beige Mottled 12" Floor Tile	Room 6, Floor 2 nd Layer	None Detected
4B	Beige Mottled 12" Floor Tile	Room 6, Floor 2 nd Layer	None Detected
5A	Tan Stair Tread Mastic	Room 1, Stair Tread	None Detected
5B	Tan Stair Tread Mastic	Room 1, Stair Tread	None Detected
6A	Cream Cove Molding Mastic	Room 2, Wall Base	None Detected
6B	Cream Cove Molding Mastic	Room 4, Wall Base	None Detected
7A	Gray Drywall	Basement Stairwell, Wall	None Detected
7B	Gray Drywall	Room 1, Ceiling	None Detected
8A	White Joint Compound	Basement Stairwell, Wall	Chrysotile 2.3%
8B	White Joint Compound	Room 3, Wall	Chrysotile 2.3%
8C	White Joint Compound	Room 2, Wall	Chrysotile 2.6%
8D	White Joint Compound	Room 4, Wall	Chrysotile 3.1%
8E	White Joint Compound	Room 6, Wall	Chrysotile 2.8%
9A	White Ceiling Stucco	Room 1, Ceiling	Chrysotile 2.4%
9B	White Ceiling Stucco	Room 4, Ceiling	Chrysotile 3.6%
9C	White Ceiling Stucco	Room 8, Ceiling	Chrysotile 2.2%
10A	White Sink Coating	Room 3, Under Sink	None Detected
10B	White Sink Coating	Room 3, Under Sink	None Detected

Asbestos Bulk Sample Summary Table

Comprehensive Regulated Building Materials Inspection
Holland Townhouses
56 Holland Street
Rochester, New York 14605

Items in Bold are Confirmed ACM

<i>Sample #</i>	<i>Type of Material</i>	<i>Sample Location</i>	<i>Results % Asbestos</i>
11A	Brown Insulation	Attic, Ceiling Plenum	None Detected
11B	Brown Insulation	Attic, Ceiling Plenum	None Detected
11C	Brown Insulation	Attic, Ceiling Plenum	None Detected



APPENDIX A:
INSPECTION FACT SHEET

Inspection Fact Sheet

Name and Address of Building/Structure

Holland Townhouses _____

56 Holland Street _____

Rochester, New York 14605 _____

Name and Address of Building/Structure Owner

Rochester Housing Authority _____

495 Upper Falls Boulevard _____

Rochester, New York 14605 _____

Name and Address of Owner's Agent

LaBella Associates, D.P.C. _____

300 State Street, Suite 201 _____

Rochester, New York 14614 _____

Name of the Firm & Person Conducting the Inspection

LaBella Associates, D.P.C. _____

Chris Enright (NYSDOL Cert. #24-6130A-SHAB) _____

Date the Inspection Was Conducted

May 17, 2024 _____

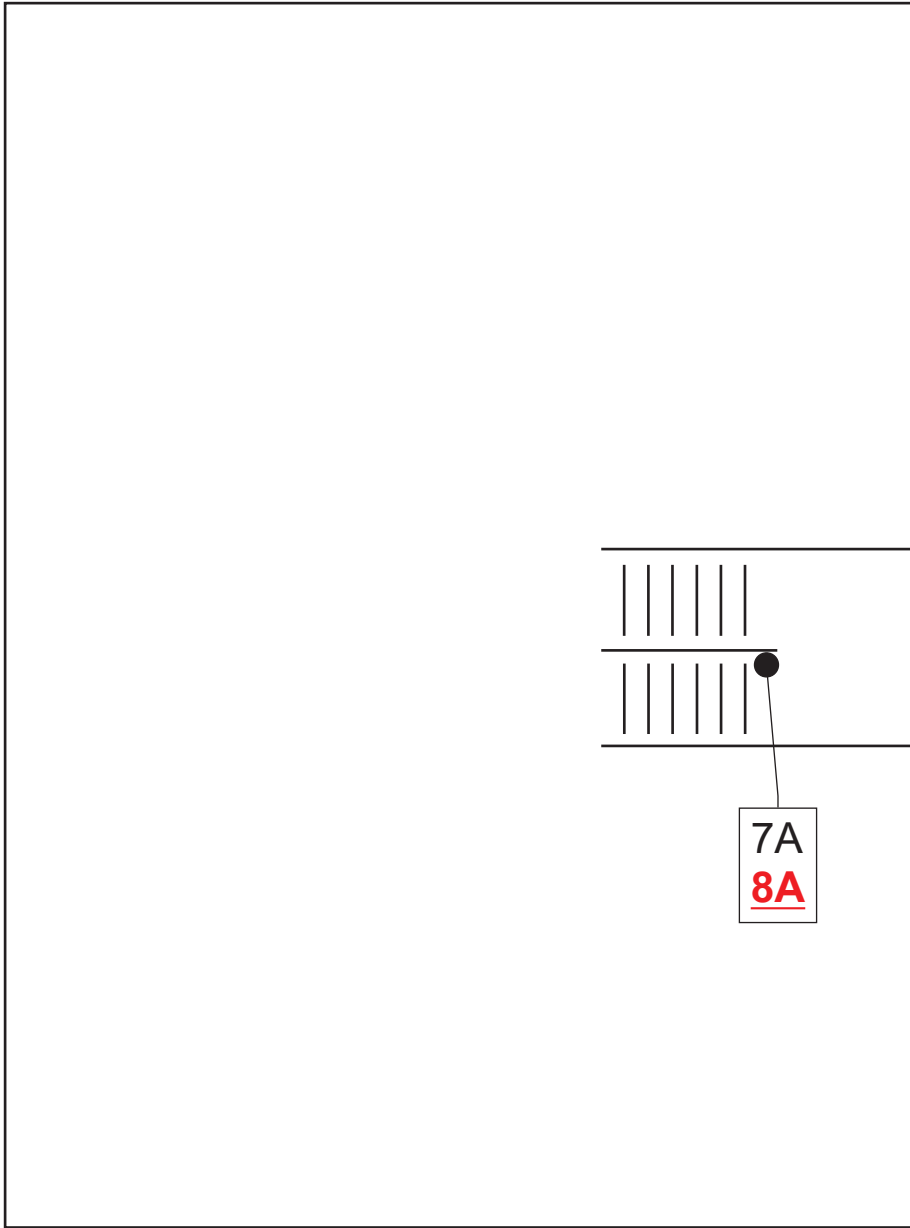


**APPENDIX B:
SAMPLE LOCATION DRAWINGS**

A

56 Holland Street
Rochester, New York 14605

Basement Bulk Samples



D

B

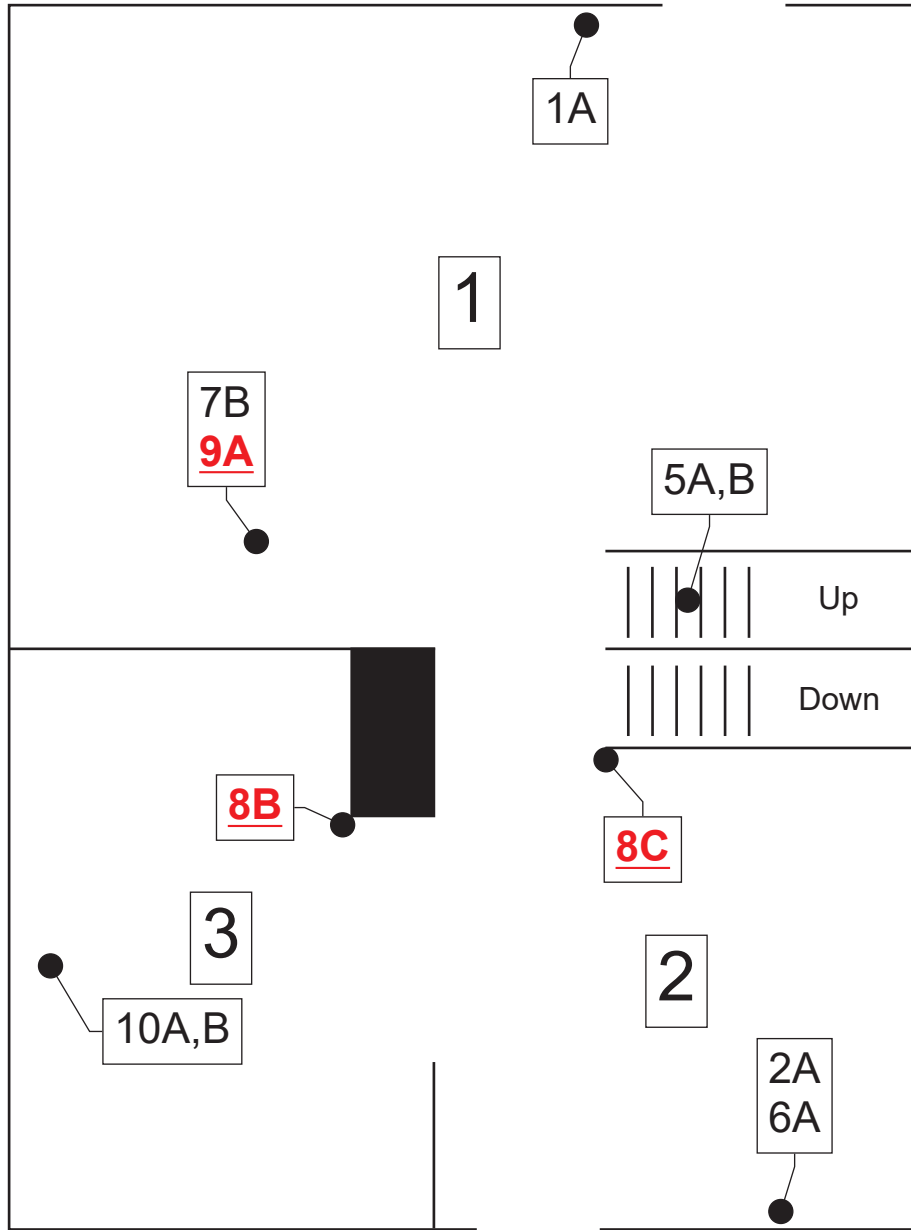
C

Confirmed ACM **8A**

A

56 Holland Street
Rochester, New York 14605

First Floor Bulk Samples

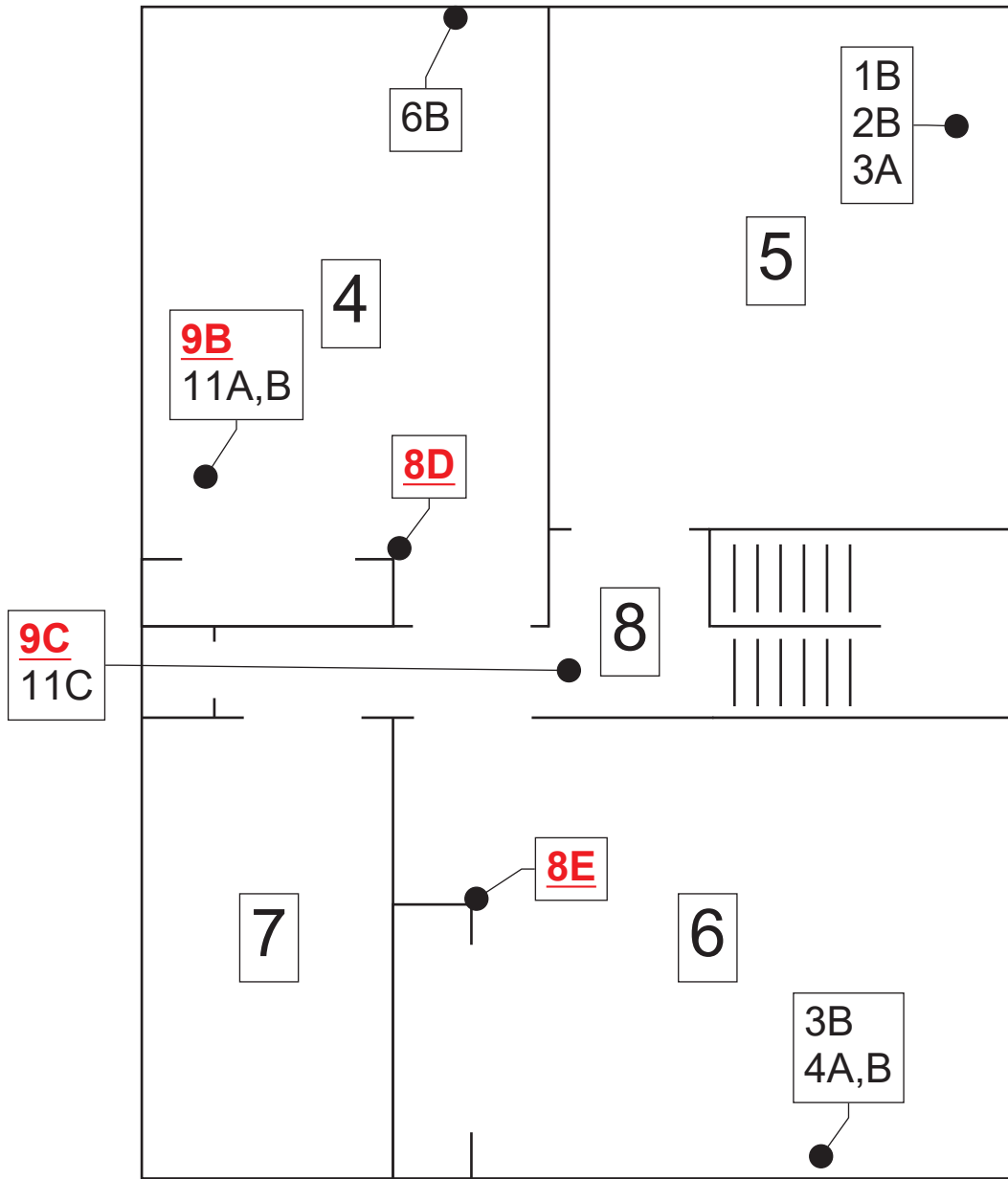


Confirmed ACM **Bold and Underlined**

A

56 Holland Street
Rochester, New York 14605

Second Floor Bulk Samples



Confirmed ACM **Bold and Underlined**



APPENDIX C: INSPECTION PHOTOS



Photo 1

View of White Asbestos-Containing Joint Compound on Walls and Ceilings Throughout

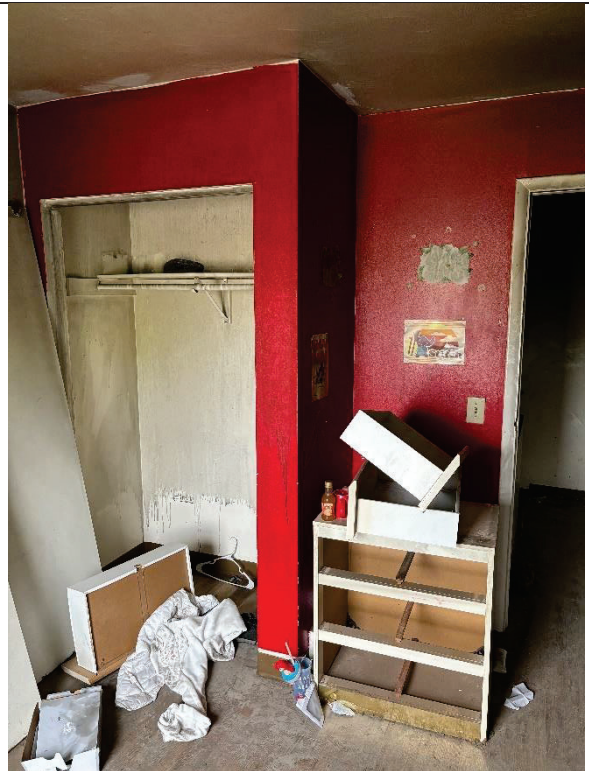


Photo 2

View of White Asbestos-Containing Joint Compound on Walls and Ceilings Throughout



Photo 3

View of White Asbestos-Containing Stucco on Ceilings Throughout



Photo 4

View of Damaged Asbestos-Containing Joint Compound and Ceiling Stucco in Room 1



Photo 5

View of Damaged Asbestos-Containing Joint Compound and Ceiling Stucco in Room 4



Photo 6

View of Damaged Asbestos-Containing Joint Compound and Ceiling Stucco in Room 4



**APPENDIX D:
LABORATORY ANALYTICAL
REPORTS**

Bulk Sample Asbestos Analytical Report

LABELLA ASSOCIATES, DPC
ANALYTICAL LABORATORY
300 STATE STREET
ROCHESTER, NY 14614
585.454.6110 FAX 585.454.3066

LBL ELAP # 11184
All TEM analysis by AMA Lab, ELAP # 10920
PLM Methods: 198.1, 198.4 & 198.6
RSD: 18.3

LBL JOB # 35024

Page 1 of 2

Client Code:

CLIENT: Labella Associates

Project Number: 2242218

ADDRESS: 300 State Street

Rochester, NY 14614

Sample Type: PLM Bulk

Sample Date: 5/17/2024

PROJECT LOCATION: 56 Holland Street, Rochester, NY

Field ID	LBL ID	Method	Asbestos Type	%	Other Fibers	%	Matrix	%	Color/Description
1A	35024-1	T	ND		ND		MIN/VINYL	100	BROWN/GRAY FLOORING
1B	35024-2	T	ND		ND		MIN/VINYL	100	BROWN/GRAY FLOORING
2A	35024-3	T	ND		ND		MIN/VINYL	100	TAN FLOOR TILE
2B	35024-4	T	ND		ND		MIN/VINYL	100	TAN FLOOR TILE
3A	35024-5	T	ND		ND		MIN/BINDER	100	TAN MASTIC
3B	35024-6	T	ND		ND		MIN/BINDER	100	TAN MASTIC
4A	35024-7	G	ND		ND		MIN/VINYL	100	BEIGE FLOOR TILE
4B	35024-8	G	ND		ND		MIN/VINYL	100	BEIGE FLOOR TILE
5A	35024-9	T	ND		ND		MIN/BINDER	100	TAN MASTIC
5B	35024-10	T	ND		ND		MIN/BINDER	100	TAN MASTIC
6A	35024-11	T	ND		ND		MIN/BINDER	100	CREAM MASTIC
6B	35024-12	T	ND		ND		MIN/BINDER	100	CREAM MASTIC
7A	35024-13	P	ND		CELL	1	MIN	99	GRAY DRYWALL
7B	35024-14	P	ND		CELL	1	MIN	99	GRAY DRYWALL
8A	35024-15	P	CHRYSOTILE	2.3	CELL	0.7	MIN	97	WHITE JOINT COMPOUND
8B	35024-16	P	CHRYSOTILE	2.3	CELL	0.7	MIN	97	WHITE JOINT COMPOUND
8C	35024-17	P	CHRYSOTILE	2.6	CELL	0.4	MIN	97	WHITE JOINT COMPOUND
8D	35024-18	P	CHRYSOTILE	3.1	CELL	0.9	MIN	96	WHITE JOINT COMPOUND
8E	35024-19	P	CHRYSOTILE	2.8	CELL	0.2	MIN	97	WHITE JOINT COMPOUND
9A	35024-20	P	CHRYSOTILE	2.4	CELL	0.6	MIN	97	WHITE CEILING STUCCO
9B	35024-21	P	CHRYSOTILE	3.6	CELL	0.4	MIN	96	WHITE CEILING STUCCO

LAB DIRECTOR: Matthew Smith

Date: 5/21/24

Method Code: P - Friable PLM result N - NOB PLM result T - TEM result IN* - Inconclusive G - Gravimetric Matrix Reduction where sample residue weight is less than 1% of original sample weight, TEM not required.

Terms: ND** - None Detected CELL - Cellulose JC - Joint Compound MIN - Mineral GLASS - Fiberglass <1** - Trace PLAS - Plaster Vermiculite - Vermiculite is reported as an asbestos-containing mineral in accordance with NYSDOH determinations and requirements. See NYSDOH guidance, available upon request.

* "Polarized-light microscopy (PLM) is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can be used to determine if this material can be considered to be non-asbestos containing."

** Please note: Due to interference from sample matrix components results reported via PLM method ELAP 198.1 as negative (ND) or less than 1% (Trace) may be inaccurate and reported as a False Negative. It is recommended that additional analytical techniques such as gravimetric reduction, TEM and others be used to reduce obscuring effects of some matrix components yielding more accurate results.

LaBella Lab Bulk Sample Asbestos Analytical Report

LBL JOB # 35024

Client Code:

CLIENT: Labella Associates

Project Number: 2242218

PROJECT LOCATION: 56 Holland Street, Rochester, NY

Field ID	LBL ID	Method	Asbestos Type	%	Other Fibers	%	Matrix	%	Color/Description
9C	35024-22	P	CHRYSOTILE	2.2	CELL	0.8	MIN	97	WHITE CEILING STUCCO
10A	35024-23	P	ND		CELL	15	MIN	85	WHITE SINK COATING
10B	35024-24	P	ND		CELL	15	MIN	85	WHITE SINK COATING
11A	35024-25	P	ND		CELL	100	ND		BROWN INSULATION
11B	35024-26	P	ND		CELL	100	ND		BROWN INSULATION
11C	35024-27	P	ND		CELL	100	ND		BROWN INSULATION

LAB DIRECTOR: Matthew Smith Date: 5/21/24

Method Code: P - Friable PLM result N - NOB PLM result T - TEM result IN* - Inconclusive G - Gravimetric Matrix Reduction where sample residue weight is less than 1% of original sample weight, TEM not required.
Terms: ND** - None Detected CELL - Cellulose JC - Joint Compound MIN - Mineral GLASS - Fiberglass <1** - Trace PLAS - Plaster Vermiculite - Vermiculite is reported as an asbestos-containing mineral in accordance with NYSDOH determinations and requirements. See NYSDOH guidance, available upon request.

* "Polarized-light microscopy (PLM) is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can be used to determine if this material can be considered to be non-asbestos containing."
** Please note: Due to interference from sample matrix components results reported via PLM method ELAP 198.1 as negative (ND) or less than 1% (Trace) may be inaccurate and reported as a False Negative. It is recommended that additional analytical techniques such as gravimetric reduction, TEM and others be used to reduce obscuring effects of some matrix components yielding more accurate results.

Location: 56 Holland Street, Rochester NY

Client: Rochester Housing Authority

Job No.: 2242218

Rates: 16/24/40

Date: 5/17/2024

Relinquished by: Chris Enright

Sampled By: Chris Enright

Received by: Matt Smith 5/20/24

LaBella Lab No.: 35024

Number of Samples: _____

STOP Positive: YES NO

Field ID #	Sample Location	Type of Suspect ACM to be Analyzed	Approx. Amount
T 1	1A Room 1, Floor 1 st Layer	Brown/Gray Flooring	
T 2	1B Room 5, Floor 1 st Layer	Brown/Gray Flooring	
T 3	2A Room 2, Floor 2 nd Layer	Tan Streaked 12" Floor Tile	
T 4	2B Room 5, Floor 2 nd Layer	Tan Streaked 12" Floor Tile	
T 5	3A Room 5, Floor 2 nd Layer	Tan Floor Tile Mastic	
T 6	3B Room 6, Floor 2 nd Layer	Tan Floor Tile Mastic	
T 7	4A Room 6, Floor 2 nd Layer	Beige Mottled 12" Floor Tile	
T 8	4B Room 6, Floor 2 nd Layer	Beige Mottled 12" Floor Tile	
T 9	5A Room 1, Stair Tread	Tan Stair Tread Mastic	
T 10	5B Room 1, Stair Tread	Tan Stair Tread Mastic	
T 11	6A Room 2, Wall Base	Cream Cove Molding Mastic	
T 12	6B Room 4, Wall Base	Cream Cove Molding Mastic	
P 13	7A Basement Stairwell, Wall	Gray Drywall	
P 14	7B Room 1, Ceiling	Gray Drywall	
+ P 15	8A Basement Stairwell, Wall	White Joint Compound	
+ P 16	8B Room 3, Wall	White Joint Compound	
+ P 17	8C Room 2, Wall	White Joint Compound	
+ P 18	8D Room 4, Wall	White Joint Compound	
+ P 19	8E Room 6, Wall	White Joint Compound	
+ P 20	9A Room 1, Ceiling	White Ceiling Stucco	
+ P 21	9B Room 4, Ceiling	White Ceiling Stucco	
+ P 22	9C Room 8, Ceiling	White Ceiling Stucco	

ASBESTOS SAMPLING SURVEY
BULK SAMPLE LOG
AND CHAIN OF CUSTODY

Location: 56 Holland Street, Rochester NY

Client: Rochester Housing Authority

Job No.: 2242218

Rates: 16/24/40

Date: 5/17/2024

Relinquished by: Chris Enright

Sampled By: Chris Enright

Received by: Matt Smith 5/20/24

LaBella Lab No.: 35024

Number of Samples: _____

STOP Positive: YES NO

P 23
P 24
P 25
P 26
P 27

Field ID #	Sample Location	Type of Suspect ACM to be Analyzed	Approx. Amount
10A	Room 3, Under Sink	White Sink Coating	
10B	Room 3, Under Sink	White Sink Coating	
11A	Attic, Ceiling Plenum	Brown Insulation	
11B	Attic, Ceiling Plenum	Brown Insulation	
11C	Attic, Ceiling Plenum	Brown Insulation	

XRF Lead Sampling Summary Table
Holland Townhouses
56 Holland Street
Rochester, New York 14605
LaBella Project No. 2242439

Reading #	Conc. (mg/cm ²)	Result	Room	Wall	Structure	Substrate	Color	Condition	Cause
1	1.1	P	Calibration	-	-	-	-	-	-
2	1.1	P	Calibration	-	-	-	-	-	-
3	1.2	P	Calibration	-	-	-	-	-	-
4	0.0	N	Calibration	-	-	-	-	-	-
5	0.0	N	Calibration	-	-	-	-	-	-
6	0.0	N	Calibration	-	-	-	-	-	-
7	0.1	N	Basement	-	I-Beam	Metal	Brown	-	-
8	0.0	N	Basement	-	Support Post	Metal	Brown	-	-
9	0.1	N	Basement	B	Wall	CMU	White	-	-
10	0.0	N	Basement	-	Handrail	Wood	Brown	-	-
11	0.0	N	Basement	-	Tread	Wood	Brown	-	-
12	0.0	N	Basement	-	Stringer	Wood	Brown	-	-
13	0.0	N	Basement	-	Floor	Concrete	Gray	-	-
14	0.0	N	Room 1	A	Wall	Drywall	White	-	-
15	0.0	N	Room 1	A	Wall Base	Vinyl	Brown	-	-
16	0.0	N	Room 1	A	Door Case	Wood	White	-	-
17	0.1	N	Room 1	A	Door	Metal	White	-	-
18	0.0	N	Room 1	A	Windowsill	Wood	White	-	-
19	0.0	N	Room 1	-	Ceiling	Drywall	White	-	-

Reading #	Conc. (mg/cm ²)	Result	Room	Wall	Structure	Substrate	Color	Condition	Cause
20	0.0	N	Room 1	-	Riser	Wood	Brown	-	-
21	0.0	N	Room 1	-	Stringer	Wood	Brown	-	-
22	0.0	N	Room 1	-	Handrail	Wood	Brown	-	-
23	0.0	N	Room 2	B	Wall	Drywall	Yellow	-	-
24	0.0	N	Room 2	B	Door Case	Wood	White	-	-
25	0.0	N	Room 2	B	Door	Metal	White	-	-
26	0.0	N	Room 3	-	Ceiling	Drywall	White	-	-
27	0.0	N	Room 5	C	Wall	Drywall	Red	-	-
28	0.1	N	Room 5	D	Wall	Drywall	Gray	-	-
29	0.1	N	Room 6	A	Wall	Drywall	White	-	-
30	0.1	N	Room 6	A	Wall Base	Vinyl	Brown	-	-
31	0.0	N	Room 6	A	Door Case	Wood	White	-	-
32	0.0	N	Room 6	A	Door	Wood	White	-	-
33	0.0	N	Room 6	C	Windowsill 2	Wood	White	-	-
34	0.0	N	Room 6	D	Closet Door	Wood	White	-	-
35	0.1	N	Room 7	D	Wall	Drywall	Blue	-	-
36	0.0	N	Room 7	-	Ceiling	Drywall	White	-	-
37	0.0	N	Room 7	D	Toilet	Porcelain	White	-	-
38	0.0	N	Room 7	C	Tub	Porcelain	White	-	-
39	0.0	N	Room 8	A	Door Case 1	Wood	White	-	-
40	0.1	N	Room 8	A	Door 1	Wood	White	-	-
41	0.0	N	Room 8	-	Ceiling	Drywall	White	-	-
42	0.1	N	Room 8	D	Wall	Drywall	White	-	-

Reading #	Conc. (mg/cm2)	Result	Room	Wall	Structure	Substrate	Color	Condition	Cause
43	1.1	P	Calibration	-	-	-	-	-	-
44	1.1	P	Calibration	-	-	-	-	-	-
45	1.2	P	Calibration	-	-	-	-	-	-
46	0.0	N	Calibration	-	-	-	-	-	-
47	0.0	N	Calibration	-	-	-	-	-	-
48	0.0	N	Calibration	-	-	-	-	-	-



APPENDIX E: LICENSES AND CERTIFICATIONS

WE ARE YOUR DOL



DIVISION OF SAFETY & HEALTH LICENSE AND CERTIFICATE UNIT, STATE OFFICE CAMPUS, BLDG. 12, ALBANY, NY 12226

ASBESTOS HANDLING LICENSE

LaBella Associates, D.P.C.
300 State Street, Suite 201, Rochester, NY, 14614

License Number: 29278

License Class: RESTRICTED

Date of Issue: 03/25/2024

Expiration Date: 03/31/2025

Duly Authorized Representative: Greg Senecal

This license has been issued in accordance with applicable provisions of Article 30 of the Labor Law of New York State and of the New York State Codes, Rules and Regulations (12 NYCRR Part 56). It is subject to suspension or revocation for a (1) serious violation of state, federal or local laws with regard to the conduct of an asbestos project, or (2) demonstrated lack of responsibility in the conduct of any job involving asbestos or asbestos material.

This license is valid only for the contractor named above and this license or a photocopy must be prominently displayed at the asbestos project worksite. This license verifies that all persons employed by the licensee on an asbestos project in New York State have been issued an Asbestos Certificate, appropriate for the type of work they perform, by the New York State Department of Labor.

Amy Phillips, Director
For the Commissioner of Labor

EXCELSIOR

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER



Expires 12:01 AM April 01, 2025
Issued April 01, 2024

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

*MR. MATTHEW SMITH
LABELLA ASSOCIATES
300 STATE STREET SUITE 200
ROCHESTER, NY 14614*

NY Lab Id No: 11184

*is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:*

Miscellaneous

Asbestos in Friable Material Item 198.1 of Manual
Asbestos in Non-Friable Material-PLM Item 198.6 of Manual (NOB by PLM)

Serial No.: 68695

Property of the New York State Department of Health. Certificates are valid only at the address shown and must be conspicuously posted by the laboratory. Continued accreditation depends on the laboratory's successful ongoing participation in the Program. Consumers may verify a laboratory's accreditation status online at <https://apps.health.ny.gov/pubdoh/applinks/wc/elappublicweb/>, by phone (518) 485-5570 or by email to elap@health.ny.gov.

NEW YORK STATE DEPARTMENT OF HEALTH
WADSWORTH CENTER



Expires 12:01 AM April 01, 2024
Issued April 01, 2022
Revised March 30, 2023

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

MICHAEL GREENBERG
AMA ANALYTICAL SERVICES INC
4475 FORBES BLVD
LANHAM, MD 20706

NY Lab Id No: 10920

is hereby APPROVED as an Environmental Laboratory for the category
ENVIRONMENTAL ANALYSES SOLID AND HAZARDOUS WASTE
All approved subcategories and/or analytes are listed below:

Metals I

Lead, Total EPA 7000B

Miscellaneous

Asbestos in Friable Material Item 198.1 of Manual
EPA 600/M4/82/020
Asbestos in Non-Friable Material-PLM Item 198.6 of Manual (NOB by PLM)
Asbestos in Non-Friable Material-TEM Item 198.4 of Manual
Lead in Dust Wipes EPA 7000B
Lead in Paint EPA 7000B

Sample Preparation Methods

ASTM E-1979-17

Serial No.: 66247

Property of the New York State Department of Health. Certificates are valid only at the address shown and must be conspicuously posted by the laboratory. Continued accreditation depends on the laboratory's successful ongoing participation in the Program. Consumers may verify a laboratory's accreditation status online at <https://apps.health.ny.gov/pubdoh/applinks/wc/elappublicweb/>, by phone (518) 485-5570 or by email to elap@health.ny.gov.

United States Environmental Protection Agency

This is to certify that



LaBella Associates, D.P.C.

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires September 26, 2024

LBP-22226-2

Certification #

August 24, 2021

Issued On

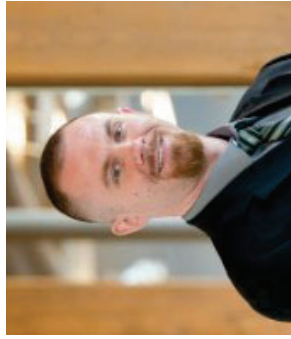
Michelle Price, Chief

Lead, Heavy Metals, and Inorganics Branch



United States Environmental Protection Agency

This is to certify that



Chris Enright

has fulfilled the requirements of the Toxic Substances Control Act (TSCA) Section 402, and has received certification to conduct lead-based paint activities pursuant to 40 CFR Part 745.226 as:

Risk Assessor

In the Jurisdiction of:

All EPA Administered Lead-based Paint Activities Program States, Tribes and Territories

This certification is valid from the date of issuance and expires October 24, 2025

LBP-R-22573-2

Certification #

August 02, 2022

Issued On

Ben Conetta, Chief

Chemicals and Multimedia Programs Branch





IF FOUND, RETURN TO:
NYS DOL - L&C UNIT
ROOM 161A BUILDING 12
STATE OFFICE CAMPUS
ALBANY NY 12226

ASBESTOS GENERAL NOTES:

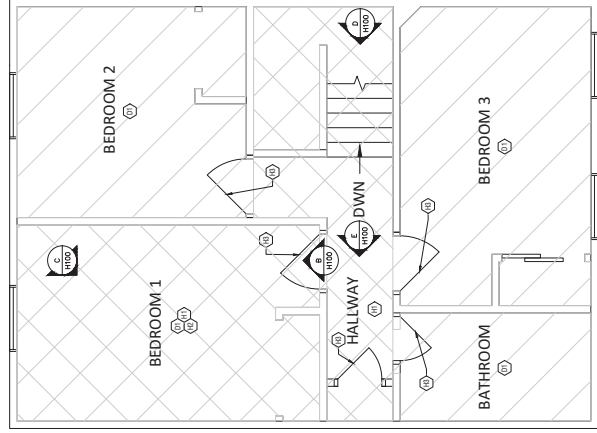
1. CONTRACTOR SHALL VERIFY THE LOCATION OF ALL ASBESTOS CONTAINING MATERIALS IN CONCORDANCE WITH FEDERAL, STATE AND LOCAL REGULATIONS AND ALL OTHER APPLICABLE FEDERAL, STATE AND LOCAL REGULATIONS.
2. IN THE EVENT OF ANY DISCREPANCY BETWEEN THE CONTRACTOR'S FIELD OBSERVATIONS AND THE INFORMATION PROVIDED BY THE OWNER, THE CONTRACTOR SHALL NOTIFY THE OWNER IMMEDIATELY BY TELEPHONE AND IN WRITING. THE CONTRACTOR SHALL NOT BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS OR FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE. ALL COSTS ASSOCIATED WITH THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS SHALL BE BORNE BY THE CONTRACTOR. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
3. THE IDENTIFICATION OF ANY ASBESTOS CONTAINING MATERIAL OR SUSPECT MATERIAL SHALL BE PERFORMED BY A LICENSED ASBESTOS ABATEMENT CONTRACTOR.
4. CONTRACTORS RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
5. CONTRACTORS RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
6. CONTRACTORS SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
7. THE LOCATION OF ANY ASBESTOS CONTAINING MATERIAL, SUSPECT MATERIAL, OR ASBESTOS CONTAINING MATERIAL SHALL BE IDENTIFIED AND APPROVED BY THE OWNER OR THE OWNER'S REPRESENTATIVE.
8. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
9. HAZARDOUS MATERIALS SHALL BE IDENTIFIED AND APPROVED BY THE OWNER OR THE OWNER'S REPRESENTATIVE.
10. CONTRACTORS SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
11. IF ADDITIONAL SUSPECT ASBESTOS IS DISCOVERED DURING THE COURSE OF THE WORK, THE CONTRACTOR SHALL STOP WORK AND NOTIFY THE CONSULTANT IMMEDIATELY.
12. IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO DETERMINE CURRENT WASTE HANDLING, TRANSPORTATION AND DISPOSAL REGULATIONS FOR THE WORK. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS WITH ALL APPLICABLE FEDERAL, STATE AND LOCAL REGULATIONS.
13. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
14. CONTRACTORS SHOULD FIELD LOCATE WATER AND ELECTRICAL UTILITY CONNECTIONS AND RECORD THEM ON THE PROJECT MANUAL.
15. NOT NOTES CENTERED THROUGH APPLICABLE TO THE ROOM.

ASBESTOS INCIDENTAL DISTURBANCE ABATEMENT NOTES:

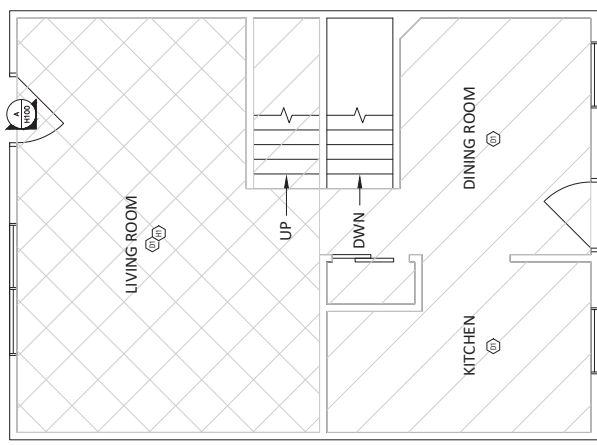
1. REMOVE FROM THE AREAS INDICATED ALL GYPSUM BOARD CEILING SYSTEMS, ASSOCIATED ASBESTOS CONTAINING JOINT COMPOUND, AND ASSOCIATED MATERIALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
2. REMOVE FROM THE AREAS INDICATED ALL GYPSUM BOARD WALL SYSTEMS, ASSOCIATED ASBESTOS CONTAINING JOINT COMPOUND, AND ASSOCIATED MATERIALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.
3. REMOVE FROM THE AREAS INDICATED ALL GYPSUM BOARD FLOOR SYSTEMS, ASSOCIATED ASBESTOS CONTAINING JOINT COMPOUND, AND ASSOCIATED MATERIALS. THE CONTRACTOR SHALL BE RESPONSIBLE FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS AND FOR THE IDENTIFICATION OF ASBESTOS CONTAINING MATERIALS BY THE OWNER'S REPRESENTATIVE.

ASBESTOS REMOVAL NOTES:

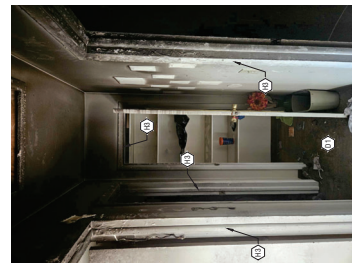
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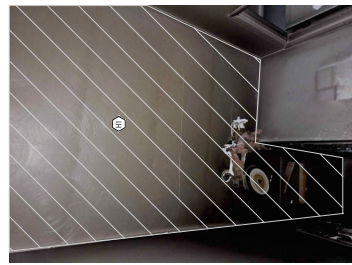
2 UNIT 56 UPPER LEVEL ABATEMENT PLAN
 3'0" x 11'0"



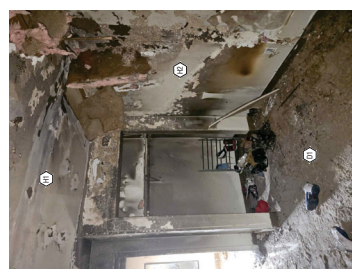
1 UNIT 56 LOWER LEVEL ABATEMENT PLAN
 3'0" x 11'0"



E VIEW OF DOOR CASINGS - HALLWAY



D VIEW OF CEILING GYPSUM BOARD - HALLWAY



C VIEW OF GYPSUM BOARD - BEDROOM 1



B VIEW OF GYPSUM BOARD - BEDROOM 1



A VIEW OF GYPSUM BOARD/DEBRIS - LIVING ROOM