Clean Environments, Inc.
Industrial Hygiene & Environmental Consultants

February 4, 2025

Mr. Nate Solis
Fisher Heck Architects, Inc.
915 S St Mary`s Street
San Antonio, TX 78205

RE: Limited Asbestos Survey- DSHS Notification
Live Oak Courthouse-Flooring only
301 Houston Street, George West, Texas 78022
CEI Project №: 18286.2

A limited asbestos survey was conducted at the above-referenced property on January 30, 2025. The survey was accomplished by Mr. Joesph Ford, Asbestos Inspector, Department of State Health Services (DSHS) License № 60-4129 of Clean Environments, Inc., working with Mr. Craig Nelson, Individual Asbestos Consultant, DSHS License № 10-5726 of Clean Environments, Inc., Asbestos Consultant Agency, DSHS License № 10-0005. The asbestos-containing building material (ACBM) survey was conducted in accordance with the EPA *Guidance for Controlling Asbestos-Containing Materials in Buildings*, EPA 560/5-85-024, June 1985, Texas Asbestos Health Protection Rules (25 TAC 295), March 2003, which requires that an asbestos survey be accomplished prior to demolition, renovation, and/or alterations that include the demolition of interior building materials and/or remodeling for any commercial structure.

The asbestos survey was limited to readily accessible building materials inside the building unless otherwise noted. No destructive sampling was accomplished. Asbestos surveys accomplished for renovation or demolition activities are generally limited to materials identified (by the owner representative) as materials that will be disturbed during renovation or demolition activities. If any suspect asbestos materials not identified in this survey are uncovered during any demolition or renovation activity, please contact Clean Environments, Inc. immediately for further assessment.

BACKGROUND

Construction materials containing asbestos have been used extensively in buildings. Asbestos possesses excellent properties for fireproofing and insulation materials. Asbestos may be found in: (1) cement products; (2) spray-applied or trowel applied materials on the ceiling, walls, and other surfaces; (3) insulation on pipes, boilers, tanks, ducts, and other equipment; (4) vinyl floor tiles; (5) roofing felts; (6) flooring coatings; and (7) other miscellaneous products. Friable asbestos material is any materials that contain more than 1 percent asbestos by weight, which can be crumbled, pulverized, or reduced to powder, when dry, by hand pressure.

Some of these asbestos-containing materials are not considered friable now, but could become friable if not properly managed and maintained under an asbestos management program.

The concern about exposure to asbestos is based on evidence linking various respiratory diseases with occupational exposure in the shipbuilding, mining, milling, and fabricating industries. The presence of asbestos does not mean that there is a significant health risk to the property occupants. As long as asbestos-containing materials remain in good condition and are not disturbed, exposure is unlikely. Through proper control of building operations and maintenance activities, disturbance or damages to asbestos-containing materials in buildings are minimized, thus limiting the occupant's exposure to airborne asbestos fibers. Building alterations and/or demolition require knowledge of what materials contain asbestos and if they will be removed or disturbed during the project. Under the Clean Air Act, the EPA has issued a National Emission Standard for Asbestos (40 CFR 61.140-61.156). This Standard regulates reporting requirements, work practices, waste disposal, and emissions from facility modification and/or demolition operations. The Standard applies only to materials containing more than 1% friable asbestos. Asbestos containing material according to the State of Texas Asbestos Health Rules is any building material containing greater than 1% asbestos.

Initially, a visual walk-thru inspection was conducted on the building. Based on this initial survey, areas were identified for physical assessment and bulk sample analysis. Then a detailed inspection was accomplished together with bulk sampling, as necessary. Material sampling conforms to the requirements in the 40 CFR 763.88. The sampling methods and strategies are outlined below for the three basic classifications of asbestos materials: friable surfacing materials, thermal system insulation, and miscellaneous material. The sampling scheme Clean Environments utilizes for selecting sampling locations in buildings is the EPA method identified in their document, "Asbestos in Buildings: Simplified Sampling Scheme for Friable Materials," EPA 560/5-85-030a, October 1985. Samples are selected according to homogenous areas. "Homogenous area" means an area of surfacing material, thermal system insulation, and miscellaneous asbestos materials that is uniform in color and texture, construction/application date and general appearance. At least three randomly distributed samples are collected from each homogeneous thermal insulation system. Samples are also collected on patched and fitting areas of thermal system insulation. At least one sample is collected in homogeneous miscellaneous materials. The miscellaneous materials, which are most likely sampled in buildings, are ceiling and floor tiles.

Revisions to the asbestos National Emissions Standard for Hazardous Air Pollutants (NESHAP) were promulgated on November 20, 1990. These include a requirement to point count in order to quantify asbestos in samples where the content is below 10%. The intent of the revision is to improve quantitative analysis of asbestos for all applications. Samples where no asbestos is detected do not have to be point counted. If asbestos is detected, but is less than 10%, the owner or operator of the building may elect to (1) assume the amount to be greater than 1% and treat the material as asbestos or (2) require verification of the amount by point counting.

It is a Clean Environments, Inc. policy to treat all samples with detectable levels of asbestos fibers as asbestos-containing material and to recommend a point count, using a mechanical stage and random point reticule, for all samples found to be 1% or less. The owner or operator of the building may elect to conduct further testing of samples that range from greater than 1% to 10% before treating the material as asbestos.

FINDINGS

Clean Environments conducted an inspection of suspect asbestos containing building flooring materials at the Live Oak Courthouse located at 301 Houston Street, George West, Texas, prior to renovations. The flooring was found to have brown vinyl tile with mastic, gray vinyl tile with mastic and felt paper with mastic. Three (3) suspect ACBMs were identified and sampled in triplicate for a total of nine (9) samples. The samples were analyzed at SEEML Labs, Katy, Texas, Asbestos Laboratory, DSHS License Nº 30-0474, using polarized light microscopy (PLM) analysis.

Laboratory analysis indicates that the brown vinyl tile (3%), gray vinyl tile (3%) with mastic (4%) and the felt paper with mastic (2%) are positive for Chrysotile asbestos fibers.

RECOMMENDATIONS

The brownvinyl tile, gray vinyl tile/mastic and the felt paper with mastic **must** be removed prior to any operations that may disturb the asbestos fibers in the material. Abatement must be accomplished according to the guidelines set forth in 40 CFR 61, the National Emission Standard for Hazardous Air Pollutants (NESHAP) and/or DSHS, Texas Asbestos Health Protection Rules, March 2003. This includes removal by a licensed asbestos abatement contractor and project management by a licensed asbestos consultant firm

We will be happy to answer any questions concerning the report. It has been a pleasure to work with you on this project. We look forward to being of continued service to you.

Very truly yours,

Craig Nelson
Individual Asbestos Consultant
DSHS License Nº 10-5726

Attachments:

Laboratory Results with Chain of Custody
Photographic Documentation
Drawing

LABORATORY RESULTS WITH CHAIN OF CUSTODY

SEEML Asbestos Chain-of-Custody Form

SEEML Labs
Analytical Solutions For a Healthy Indoor Environment
102 Edinburgh Court, Greenville, SC. 29607
Ph: (864) 233-3770, Fax: (864) 233-6589
WWW.SEEML.COM
NVLAP Lab ID: 201031-0

SEEML Ref# H-250131017		Lab ID: 100 - 108	
Company:	Clean Environments, Inc.	Date Sample:	01/30/2025
Project Manager:	Craig Nelson/Ray Keeble	Project No:	**18286.2**
Address:	2800 NE Loop 410, Suite 105	Project Name:	Live Oak Courthouse
City, State, Zip:	San Antonio, Texas 78218	Project Location:	301 Houston Street
Phone:	210-349-7242		George West, Texas 78022
Email:	cei@cleanenvironments.com, jbs@cleanenvironments.com & craign@cleanenvironments.com		

PLM TAT: RUSH SAME DAY NEXT DAY 2DAY 3 DAY 4 DAY 5 DAY

PLM-Bulk: **Positive Stop** Yes X No ____

- [X] PLM 600/R-93-116 (<1%)
- [ ] PLM NOB (<1%) Gravimetric

Point Count Positive Stop Yes X No ____

- [ ] 400 w/o Gravimetric (<0.25%)
- [ ] 1000 w/o Gravimetric (0.1%)
- [ ] 400 with Gravimetric (0.25%)
- [ ] 1000 with Gravimetric (<0.1%)

PCM-AIR

- [ ] NIOSH 7400

SOIL/ROCK/VERMICULITE

- [ ] PLM CARB 435- Level A (400 Point Count <0.25%)
- [ ] PLM CARB 435- Level B (1000 Point Count <0.1%)
- [ ] Cincinnati Method EPA 600/R-04/004 by PLM

TEM: SAME DAY NEXT DAY 2DAY 3DAY 5DAY

*TEM Analysis is subcontracted. TAT starts after PLM results have been submitted by SEEML, unless otherwise requested.

Sample ID	Description of Suspect Material/Location of Collection	Analysis Type	Comments
18286.2-JF-VFT-01	12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic – 1st Floor Break Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-VFT-02	12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic – 1st Floor Break Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-VFT-03	12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic – 1st Floor Break Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-VFT-04	9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic – 1st Floor Clerk Records Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-VFT-05	9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic – 1st Floor Clerk Records Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-VFT-06	9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic – 1st Floor Clerk Records Room Floor	PLM 600/R-93-116 (<1%)	
18286.2-JF-FP-07	Felt Paper/ Black Mastic – 2nd Floor Witness Room/ Conference Room	PLM 600/R-93-116 (<1%)	
18286.2-JF-FP-08	Felt Paper/ Black Mastic – 2nd Floor Witness Room/ Conference Room	PLM 600/R-93-116 (<1%)	
18286.2-JF-FP-09	Felt Paper/ Black Mastic – 2nd Floor Witness Room/ Conference Room	PLM 600/R-93-116 (<1%)	

Relinquished by:	Time/Date	Received by:	Time/Date
Joseph Ford	15 13/1-30-25	AJG	11:13am 1/31/25

SEEML Reference Number:
H-250131017
Date Issued: 01/31/2025

Southeast Environmental Microbiology Laboratories
410 W Grand Pkwy S, Suite 250
Katy, TX. 77494
Phone: 832-437-2667

Asbestos Analytical Report By: Polarized Light Microscopy

This report has been prepared for **Clean Environments, Inc.** the information and data has been checked for thoroughness and accuracy. The results reported apply only to the materials as received. The documents(s) contained herein are confidential and privileged information intended for the exclusive use of the individual or entity named above. This report shall not be reproduced except in full without SEEML's approval.

Client Project Name: Live Oak Courthouse
The Following report was prepared using this test method(s) contained within this document.

- [x] EPA 600/R-93/116- Method for the Determination of Asbestos in Bulk Building Materials - - 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
- [ ] PLM 400 Point Count (<0.25%) EPA 600/R-93/116
- [ ] PLM 1000 Point Count (<0.1%) EPA 600/R-93/116
- [ ] PLM Carb 435 Level A Reporting Limit (<0.25%)
- [ ] PLM Carb 435 Level B (Reporting limit <0.1%)
- [ ] PLM by EPA/600/R-93/116 with Milling Prep 400 Point Count
- [ ] PLM Vermiculite Initial Screening EPA 600R-93/116
- [ ] PLM Cincinnati Method 600/R-04/004 (Amphibole Only)
- [ ] PLM Vermiculite Method SOF-V 198.8 (Step 1 Chrysotile & Prep)
- [ ] PLM Vermiculite Method SOF-V 198.8 (Step 2 (Amphibole)

Approved By : *Emily Hancock*

Thank you for choosing SEEML Labs. We strive to provide superior quality testing, analytical data and customer service. SEEML is accredited through the National Institute of Standards and Technology (NIST) National Voluntary Accreditation Program (NVLAP) for bulk asbestos analysis NVLAP # 600385-0. This report must not be used to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the US government.

Southeast Environmental Microbiology Laboratories - Asbestos Division

410 W Grand Pkwy S, Suite 250 , Katy, TX. 77494

Phone: 832-437-2667, www.seeml.com

PLM Asbestos Bulk Sample Summary

Client:	Clean Environments, Inc. 2800 NE Loop 410, Ste.105 San Antonio, TX, 78218 (210) 349-7242/	Date Sampled:	01/30/2025
		Date Received:	01/31/2025
		Date Analyzed:	01/31/2025
		Date Reported:	01/31/2025
		Date Revised:	
		Project Name:	Live Oak Courthouse
		Project No:	18286.2
Analyzed by:	Emily Hancock	Project Address:	301 Houston Street
		City, State. ZIP:	George West, Texas, 78022
Methodology:	EPA 600/R-93/116- Method for the Determination of Asbestos in Bulk Building Materials - - 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples	SEEML Ref#:	H-250131017

Lab No.: / Client No.:	% Asbestos Type	% Fibrous Non-Asbestos Material Type	% Non-Fibrous Material	Description/Location
100A / 18286.2-JF-VFT-01	**3% Chrysotile**	None Detected	97% Organic Matrix	(Brown) Tile/12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic- 1st Floor Break Room Floor
100B / 18286.2-JF-VFT-01	**% None Detected**	20% Cellulose	80% Organic Matrix	(Black) Mastic/12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic- 1st Floor Break Room Floor
101A / 18286.2-JF-VFT-02	**POSITIVE STOP**			() /12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic- 1st Floor Break Room Floor
102A / 18286.2-JF-VFT-03	**POSITIVE STOP**			() /12 x 12 inch Brown Vinyl Floor Tile/ Black Mastic- 1st Floor Break Room Floor
103A / 18286.2-JF-VFT-04	**4% Chrysotile**	2% Cellulose	94% Organic Matrix	(Black) Mastic/9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic- 1st Floor Clerk Records Room Floor
103B / 18286.2-JF-VFT-04	**3% Chrysotile**	None Detected	97% Organic Matrix	(Gray) Tile/9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic- 1st Floor Clerk Records Room Floor
104A / 18286.2-JF-VFT-05	**POSITIVE STOP**			() /9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic- 1st Floor Clerk Records Room Floor
105A / 18286.2-JF-VFT-06	**POSITIVE STOP**			() /9 x 9 inch Grey Vinyl Floor Tile/ Black Mastic- 1st Floor Clerk Records Room Floor
106A / 18286.2-JF-FP-07	**% None Detected**	5% Cellulose	95% Organic Matrix	(Black) Mastic/Felt Paper/ Black Mastic- 2nd Floor Witness Room/ Conference Room

Approved By: Emily Hancock

Disclaimer:

The results in this report only apply to the samples as received.

NOB samples are tested as a preliminary analysis. We highly recommend for Negative NOB samples resulting in less than 1% Asbestos to be verified by TEM or Point Analysis.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. NAD means no asbestos fibers were detected. When detected the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.

Guidelines for Interpretation:

Any opinions/interpretations expressed in this report are outside the scope of this laboratory's accreditation. Interpretation of the data and information within this document is left to the company, consultant, and/or persons who conducted the fieldwork. A material is considered regulated asbestos containing material (ACM) where the asbestos content is determined to be one percent or greater. Several organizations, including the American Conference of Government Industrial Hygienists (ACGIH); the American Industrial Hygiene Association (AIHA); the Indoor Air Quality Association (IAQA); the United States Environmental Protection Agency (USEPA); the Centers for Disease Control (CDC) as well as the California Department of Health Services (CADHS) have published guidelines for assessment and interpretation of analytical data indicating a tested material is ACM.

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		Date Revised:	
		Project Name:	Live Oak Courthouse
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		City, State. ZIP:	George West, Texas, 78022
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Lab No.: / Client No.:	% Asbestos Type	% Fibrous Non-Asbestos Material Type	% Non-Fibrous Material	Description/Location
106B / 18286.2-JF-FP-07	**2% Chrysotile**	50% Cellulose	48% Organic Matrix	(Brown) Felt Paper/Felt Paper/ Black Mastic- 2nd Floor Witness Room/ Conference Room
107A / 18286.2-JF-FP-08	**POSITIVE STOP**			() /Felt Paper/ Black Mastic- 2nd Floor Witness Room/ Conference Room
108A / 18286.2-JF-FP-09	**POSITIVE STOP**			() /Felt Paper/ Black Mastic- 2nd Floor Witness Room/ Conference Room

Approved By: Emily Hancock

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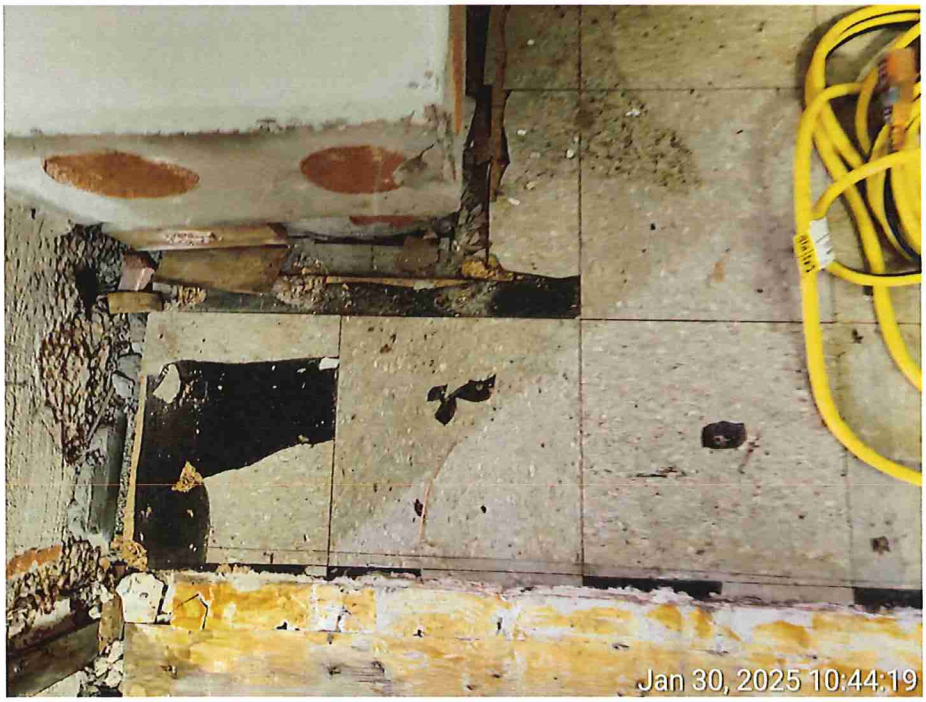
Form 8.0 Rev. 8 04/29/20

Photo Documentation

1. Exterior View of the Live Oak Courthouse located at 301 Houston Street George West, TX

2. View of Vinyl Tile

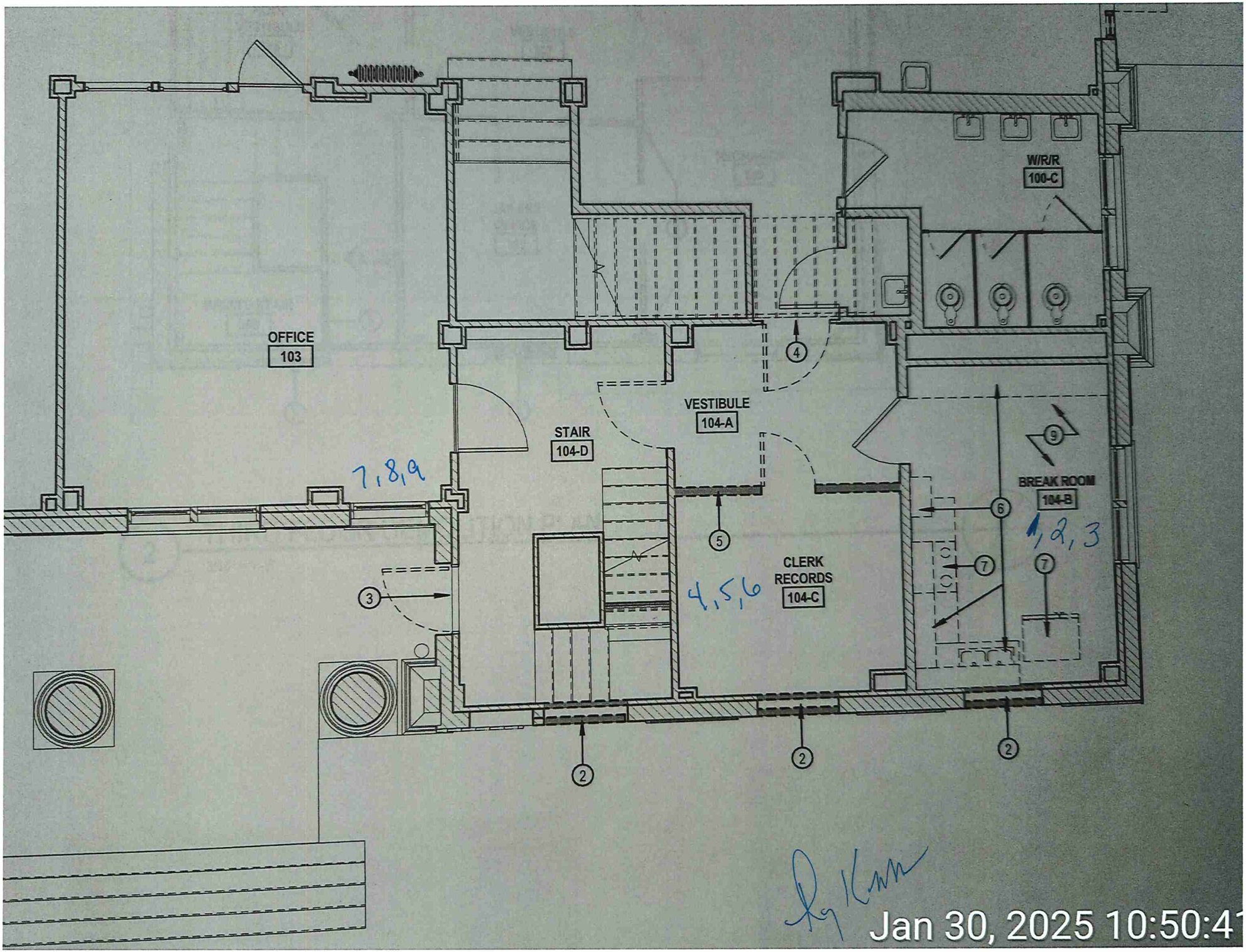
3. View of Vinyl Tile with Black Mastic



4. View of Vinyl Tile with Mastic

5. View of Felt Paper with Black Mastic

DRAWING


OFFICE
103
W/R/R
100-C
VESTIBULE
104-A
STAIR
104-D
BREAK ROOM
104-B
CLERK
RECORDS
104-C
7,8,9
4,5,6
1,2,3
Jan 30, 2025 10:50:41