ANALYSIS FOR BROWNFIELDS CLEANUP ALTERNATIVES FOR THE FIRST NATIONAL CENTER ABATEMENT PROJECT

First National Center

120 North Robinson

Oklahoma City, Oklahoma

Prepared For:

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and

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1.0 EXECUTIVE SUMMARY

This Analysis of Brownfields Cleanup Alternatives (ABCA) addresses the removal of asbestos containing materials (ACM) and removal/stabilization of lead-based paint (LBP) at the First National Center (Property) located at 120 North Robinson in downtown Oklahoma City, Oklahoma. The Property consists of three independently built and interconnected structures: the West Building constructed in 1931, the Center Building constructed in 1957 and the East Building constructed in 1972. The ABCA has been prepared as the City of Oklahoma City, Oklahoma (City) is planning to provide United States Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) funding for the proposed abatement. The scope of the proposed abatement focuses on supporting the future redevelopment of the Property. In an effort to protect the environment and human health and safety, all friable asbestos and Category II Non-Friable asbestos will be removed from the buildings prior to the planned redevelopment activities. The overall goal of the removal action is to mitigate the threats to human health and the environment presented by the Property in its current condition. Therefore, the removal action alternative selected for the Property must address specific contaminant exposure pathways, and at the same time, allow for the planned renovation of the FNC Property buildings.

Three Removal Action Alternatives (RAAs) are presented in this document. The No Action alternative is presented for comparison purposes. The alternatives are:

Alternative 1: No Action.
Alternative 2: Abatement of all the Asbestos-Containing Materials (ACM) and removal or stabilization of LBP.
Alternative 3: Abatement of only accessible ACM and removal or stabilization of LBP.

The RAAs were evaluated independently using three broad criteria including: effectiveness, implementability and cost. Following the independent evaluation of the alternatives against the three criteria, the alternatives were compared to evaluate their relative performance and to identify advantages and disadvantages that may affect removal action selection.

The proposed action, Alternative 3, meets all the comparison criteria, protects human health and the environment and will allow for the redevelopment of the Property. The estimated time required to implement Alternative 3 is eleven months. Estimated costs for abatement of only accessible ACM for portions of the Property and removal or stabilization of LBP is estimated between $10.25 million to $11.3 million.

2.0 SITE DESCRIPTION AND HISTORY

2.1 INTRODUCTION

This Analysis of Brownfields Cleanup Alternatives (ABCA) has been completed for the removal of asbestos containing materials (ACM) and removal/stabilization of lead-based paint (LBP) for the First National Center (Property), 120 North Robinson located in downtown Oklahoma City, Oklahoma. The ABCA has been prepared as the City of Oklahoma City, Oklahoma (City) is planning to provide United States Environmental Protection Agency (EPA) Brownfields Revolving Loan Fund (RLF) funding in the amount of $900,000.00 to $2.5 million (as available) for the planned abatement.

The Removal Action Objectives (RAOs) for the Property were established under the broad guidelines of protecting human health and the environment, while remaining within statutory limits, and attaining all applicable or relevant and appropriate requirements (ARARs) to the extent practicable. After identifying potential hazards, threats, and risks for the Property, RAOs were developed that will guide the project and help ensure the reduction or elimination of the identified risks to future workers and visitors. The following general RAOs were specifically developed for the Property:

- Protect the public health from fugitive emissions of asbestos or LBP dust from deteriorating building materials.
- Protect the environment from a release of the contaminants of concern, and
- Protect demolition and construction workers from the release of contaminants of concern during the renovation/restoration of the Property.

2.2 SITE LOCATION AND SITE HISTORY

The First National Center Property is located at 120 North Robinson Avenue in Oklahoma City, Oklahoma (Figure 1). The Property consists of three buildings designated as FNC-East, FNC-Center and FNC-West. The FNC-West Building includes 33 floors with approximately 450,000 square feet built in 1931. The FNC-Center Building has 14 floors with approximately 202,000 square feet (built in 1956) and the FNC-East Building consists of 15 floors with approximately 346,000 square feet (built in 1974).

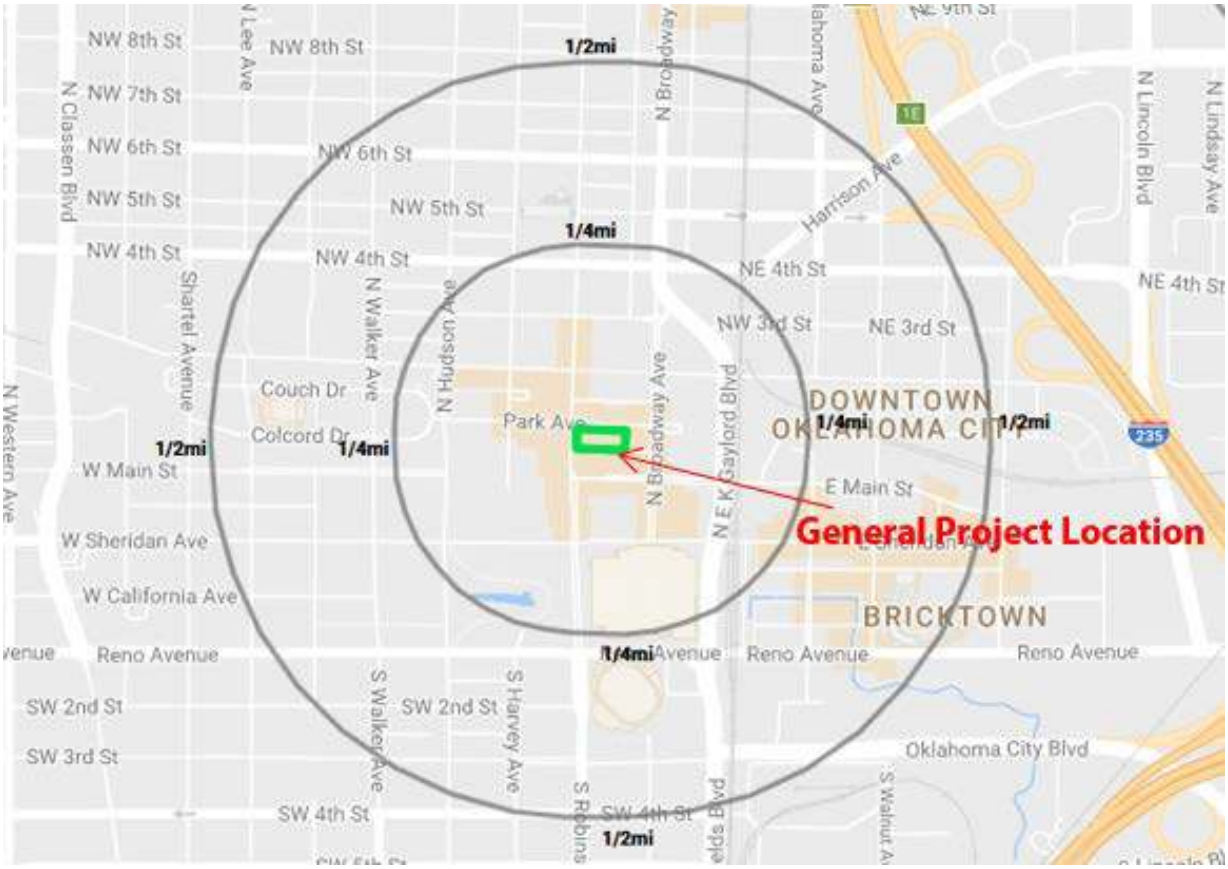
The First National Center Property is situated on approximately 1.33 acres. The Property is described as:

All lots Twenty-one (21) through Thirty-six (36) and part of vacated alley described as beginning in the northeast corner of lot Thirty-four (34) then east 10 feet, south 75 feet, east 10 feet, south 65 feet, west 20 feet, north 140 feet to beginning of Block Twenty-two (22) THE ORIGINAL ADDITION to Oklahoma City, Oklahoma.

The first owner of the building was the First National Bank Corporation for use by the First National Bank and Trust Company of Oklahoma City. Construction of the FNC-West Building was complete in 1931. In 1956, the 14-story *First National Office Building* was completed (FNC-Center Building) on the east side of the FNC-West tower. In 1974 an adjoining 15-story L-shaped annex was added that went east to Broadway Avenue, bringing the First National Center Property to its current configuration.

The FNC Property has been primarily occupied by banking entities and corporate offices. In 2008 and 2009, under previous ownership, the FNC-East Building underwent a partial renovation and asbestos abatement. Limited office and commercial uses remained on the Property until 2016. The Property has been vacant since August 2016.

Figure 1: Site Location



2.3 PLANNED REDEVELOPMENT

The proposed redevelopment of the First National Center Property includes renovating the FNC- West Building for future commercial, hotel and multi-unit residential use. The FNC-East and FNC-Center buildings are planned to be converted into ground-level commercial uses with the remaining floors converted into an above-ground parking structure. Specific to the FNC-East and FNC-Center buildings, interior components will be removed while maintaining the structural exterior for the planned parking structure; however, partial structural demolition of the FNC-East Building will be completed to facilitate the parking structure design.

2.4 SOURCE, NATURE AND EXTENT OF CONTAMINATION

2.4.1 PREVIOUS STUDIES AND SURVEYS

Two asbestos surveys were previously completed at the FNC Property for prospective purchasers. These included surveys completed by Terracon in May 2014 and June 2016 for all three FNC buildings. The 2014 and 2016 surveys provided information on estimated quantities, and general location of ACM. The 2016 Asbestos Survey incorporated results and data from the 2014 survey; however, no building plans or sampling locations were provided. Also in 2016, Terracon conducted an LBP survey exclusively for the FNC- West Building and quantified the regulated "household hazardous wastes" (HHW), including light ballasts, mercury-containing switches, PCBs, batteries and radioactive sources.

Table 1, Table 2 and Table 3 indicate the ACM identified in the 2014 and 2016 Terracon ACM surveys.

Table 1: Asbestos Containing Materials Identified in Previous Surveys- FNC West Building

Material Description	Material Location	NESHAP Classification	Estimated Quantity*
Friable Ceiling Thermal Plaster	Boiler Room Ceiling	RACM	10,500 Sq. Ft.
Acoustical Ceiling	Vault Safe Deposit Area, 4th Floor southeast. 31st Floor, 31st Floor Attic & 32nd Floor	RACM	
Brown Mastic Behind 1'x1' y Ceiling Tile	Behind 1'x1' Ceiling Tiles Throughout	Cat. I Non Friable	52,000 Sq. Ft.
Duct Paper Tape and fiberglass	13th Floor, 31st Floor, and 31st Floor attic	RACM	2500 Sq. Ft. of Paper Tape associated with 8,500 Sq. Ft. of fiberglass insulation
Piping / Fittings (steam, domestic water, drain)	Throughout building	RACM	31,000 Ln. Ft. 3,500 Fittings
Transite ®	16th Floor back of elevator room doors, Radiators, Cooling Tower	Cat II Non Friable	800 Sq. Ft.
Tank Insulation	Drinking water Tank 17th and 33rd	RACM	
Duct Insulation	12th-27th Floors and 31st Floor Attic AHU Rooms, Boiler Duct	RACM	

Hot Water Tanks (3)	Boiler Room	RACM	
DA Tank	Boiler Room	RACM	
Sand Filler Tank	Boiler Room	RACM	
Pump Tank	Boiler Room	RACM	
Joint Compound	Scattered Locations	RACM during renovation	100,000 Sq. Ft.
Floor Tile and Mastic	Throughout Building	Cat. I Non Friable	255,000 Sq. Ft.
2' X 4' Ceiling Tile	7th Floor Room 703, 29th Floor	RACM	2,000 Sq. Ft.
1'X1' Galaxy Ceiling Tile	20th Floor East Center	RACM	
Window Caulk	Windows	Cat. II Non Friable	1,700 Windows
Paper Back on radiator	8th Floor NE Room, 27th Floor W Center, and 27th Floor SW Office Area	RACM	250 Sq. Ft.
Fire Door	Stair Doors and Stairway Restroom Doors	Cat. II Non Friable	100 Doors
Mirror Mastic	Various Tenant Spaces	Cat. I Non Friable	5,000 Sq. Ft.
Roofing Materials	Roof	Cat. I Non Friable	21,000 Sq. Ft.

Table 2: Asbestos Containing Materials Identified in Previous Surveys- FNC Center Building

Material Description	Material Location	NESHAP Classification	Estimated Quantity*
Floor Tile and Mastic	Throughout Building	Cat. I Non Friable	150,000 Sq. Ft.
Duct Tape	14th Floor, 11th Floor, Risers	RACM	4,000 Sq. Ft. on 4,500 Ln. Ft. of Duct
Piping / Fittings (steam, domestic water, chilled water, drain)	Mechanical And AHU Rooms, Pipe Chases Throughout Building	RACM	4,765 Ln. Ft. with 2,360 associated fittings
Gasket	Pump Room 14th Floor	Cat II Non Friable	20 Ln. Ft.
Chillers	Pump Room 14th Floor	RACM	200 Sq. Ft.

Duct Insulation	13th Floor AHU	RACM	700 Sq. Ft.
Joint Compound	1st Floor Hallmark, 5th Floor, 10th Floor, 11th Floor, 12th Floor, 13th Floor, and 14th Floor	RACM during demolition	100,000 Sq. Ft.
Window Caulk	Windows Throughout	Cat. II Non Friable	300 Windows
Transite ®	Peg Board 14th Floor Mechanical Room Bathroom. Ground Floor Driveway	Cat. II Non Friable	1,730 Sq. Ft.
Acoustic Plaster	Basement-West of Vault	RACM	2,030 Sq. Ft.
Fire Doors	Throughout	Cat. II Non Friable	60 Doors
Roofing Materials	Roof	Cat. I Non Friable	14,000 Sq. Ft.

Table 3: Asbestos Containing Materials Identified in Previous Surveys- FNC East Building

Material Description	Material Location	NESHAP Classification	Estimated Quantity*
Floor Tile and Mastic	Throughout	Cat I Non Friable	50,000 Sq. Ft.
Sheet Vinyl Beneath Floor Tile	9th Floor	Cat. I Non Friable	430 Sq. Ft.
Piping / Fittings (steam, Domestic Water, Drain and Chilled Water)	Throughout	RACM	1,300 Ln. Ft. and 2,000 Fittings
Transite ®	Window Panels and Stored Panels	Cat. II Non Friable	10,600 Sq. Ft. 200 Sq. Ft. (stored)
Joint Compound	Basement, 2nd – 15th Floor Original Walls	RACM during demolition	131,250 Sq. Ft.
2' X 2' Ceiling Tile	Basement, 9-11th Floors	RACM	85,000 Sq. Ft.
Fire Door	Stairway Doors	Cat. II Non Friable	42 Doors
Paper Gaskets	14th Floor Boiler	RACM Non Friable	15 Sq. Ft.
Spray Applied Fire Proofing	3rd – 7th, 12th - 14th Floor Perimeter Columns, Sub-basement, Basement-East, 8th-11th Floors Throughout, 14th Floor Boiler Room, & 15th Floor Mechanical Room, Three East Elevator Shafts And Two Freight Elevator Shafts	RACM	480,000 Sq. Ft.

2.4.2 SURVEY VERIFICATION AND SUPPLEMENTAL STUDIES

Following review of previous survey documents and previous limited abatement activities, the SCS Engineers project team conducted a thorough asbestos survey verification of suspect ACM in all three buildings (January 2017). Previous reports for HHW and LBP identified in the FNC-West Building were also evaluated and LBP surveys were completed in the FNC-East and Center Buildings. The objective of the survey verification was to accurately identify the type of ACM and LBP, quantities and locations so that a Project Design and bid documents can be prepared and provided to the Oklahoma Department of Labor.

2.5 EXPOSURE PATHWAYS OF CONCERN

Asbestos is a mineral fiber that naturally occurs in rock and soil. Because of its fiber strength and heat resistance, asbestos has been used in a variety of building construction materials for insulation and as a fire retardant. Asbestos has also been used in a wide range of manufactured goods, mostly in building materials, friction products, heat-resistant fabrics, packaging, gaskets, and coatings.

The inhalation of asbestos is the primary exposure route of concern. The effects on the lung resulting from inhalation of asbestos fibers are the main cause for asbestos related health issues. Chronic inhalation exposure to asbestos can result in a lung disease, scarring of tissue surrounding the lungs, pulmonary hypertension, and immunological effects.

The abatement of asbestos in Oklahoma is stringently regulated by the Oklahoma Department of Labor (ODOL) due to the risk that abatement presents to workers. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) for asbestos relating to demolition and renovations is a work practice standard. ODOL will be notified if fiber counts for adjacent spaces, outside of the abatement area, exceed an actual fiber concentration of >0.01 fibers/cc. If the actual fiber concentration exceeds >0.01 fibers/cc, then work will need to be stopped and procedures changed in order to reduce the fiber count. The standard requires that specific actions be taken to control emissions. The asbestos NESHAP does also specify zero visible emissions to the outside air during the transportation and disposal of asbestos waste. All abated ACM will be properly disposed as special waste at a properly-permitted local landfill. The ODEQ regulates asbestos disposal facilities.

Since the contamination is currently contained inside of the FNC Building, the primary risk of inhalation is limited to those who enter the areas of the Property undergoing remediation.

Lead dust generated from decaying leaded surface coatings acts as a pathway to humans for lead deposited by lead sources such as lead paint, leaded gasoline, and industrial or occupational sources of lead. Since lead does not dissipate, biodegrade, or decay, the lead deposited into dust and soil becomes a long-term source of lead exposure. Remediation and renovation activities have the potential to stir up lead dust, resulting in an inhalation pathway.

2.6 SUMMARY OF AVAILABLE SAMPLE ANALYTICAL RESULTS

The asbestos surveys confirmed that ACM are present within the FNC Property buildings. The materials that contain asbestos will need to be addressed prior to the commencement of renovation and construction activities. The combined surveys identified the following ACM materials:

Table 4 – ACM in First National Center -West Building		
Floor(s)	**Remaining ACM**	**Location(s)**
Boiler RM	Friable Ceiling Thermal Plaster	Boiler Room Ceiling
Varies	Acoustical Ceiling	Vault Safe Deposit Area, 4th Floor southeast. 31st Floor, 31st Floor Attic & 32nd Floor
All	Brown Mastic Behind 1'x1' Ceiling Tile	Behind 1'x1' Ceiling Tiles Throughout
Varies	Duct Paper Tape and fiberglass	13th Floor, 31st Floor, and 31st Floor attic
All	Piping / Fittings (steam, domestic water, drain)	Throughout building
Varies	Transite ®	16th Floor back of elevator room doors, Radiators, Cooling Tower
17, 33	Tank Insulation	Drinking water Tank 17th and 33rd Floor
12	Duct Insulation	12th-27th Floors and 31st Floor Attic AHU Rooms, Boiler Duct
Boiler RM	Hot Water Tanks (3)	Boiler Room
Boiler RM	DA Tank	Boiler Room
Boiler RM	Sand Filler Tank	Boiler Room
Boiler RM	Pump Tank	Boiler Room
All	Joint Compound	Scattered Locations
All	Floor Tile and Mastic	Throughout Building
7, 29	2' X 4' Ceiling Tile	7th Floor Room 703, 29th Floor Kitchen
20	1' X 1' Galaxy Ceiling Tile	20th Floor East Center Room
All	Window Caulk	Windows
8, 27	Paper Back on radiator	8th Floor NE Room, 27th Floor W Center, and 27th Floor SW Office Area
All	Fire Door	Stair Doors and Stairway Restroom Doors

Table 4 – ACM in First National Center -West Building		
Floor(s)	**Remaining ACM**	**Location(s)**
Roof	Roofing Materials	Roof-Assumed
All	Layered wall system-Joint Compound on Drywall	Basement – 32nd Floor
All	Mirror mastic	Nancy F. Rm. 7
1	Fireproofing overspray	Nancy F. Rm. 1, Escalator access, Medicine Cabinet
5	White cement board canter	Suite 560-RM 6A
5	Gray cement board canter	Suite 560-RM 5
All	Black sink undercoating	Under sink basins
17	Wall texture on plaster	Throughout floor
31	Popcorn ceiling texture	3100B

Table 5 – ACM in First National Center- Center Building		
Floor(s)	**Remaining ACM**	**Location(s)**
All	Floor Tile and Mastic	Throughout Building
All	Duct Tape	Throughout Building
All	TSI – Piping/Fittings	Throughout Building
All	Pipe Gaskets	Throughout Building
14	Chillers	Pump Room
All	Duct Insulation	Throughout Building
14-10, 5, 1	Joint Compound	Walls and Ceilings
12	White Wall Texture	North Suite
12	White Ceiling Texture	North Suite
All	Window Caulk	Windows Throughout
14, 4, 1	Transite ® Peg Board	14-Mechanical Room Bathroom, 4-Raised Computer Floor-West Wall, & 1st Floor Driveway
Basement	Acoustic Plaster	West of Vault
All	Fire Doors	Assumed Throughout
Roof	Roofing Materials	Assumed

Table 5 – ACM in First National Center- Center Building		
Floor(s)	**Remaining ACM**	**Location(s)**
All	Electrical Components	Assumed Throughout
All	Elevator Components	Penthouses, Cars, Doors, and Shafts

Table 6 – ACM in First National Center- East Building		
Floor(s)	**Remaining ACM**	**Location(s)**
15	Fireproofing/Overspray	Throughout
	Joint Compound	Throughout original tan drywall walls
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
14	Fireproofing/Overspray	Throughout walls, ceilings, columns and in Boiler Room.
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	TSI – Fittings/Piping	Throughout
	White Surfacing Material	Core air shaft
	Paper Gaskets	Boiler Room
	Fire Doors	Stairwells
13 & 12	Fireproofing/Overspray	Fireproofing and Overspray – Perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
11, 10 & 9	Fireproofing/Overspray	Throughout entire walls, ceilings and columns
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	Black Mastic – 11th Floor only	Various areas throughout floor
	TSI – Fittings/Piping	Fittings throughout
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout
11	Tan 9"x9" Floor Tile/Black Mastic	Floor
	Black glue dot	Ceiling under 12"x12" Ceiling Tile
	Brown glue	Behind wood paneling
8-1	Fireproofing/Overspray	Fireproofing and Overspray – Perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	TSI – Fittings/Piping	Throughout

Table 6 – ACM in First National Center- East Building		
Floor(s)	**Remaining ACM**	**Location(s)**
	Fire Doors	Stairwells
9	Sheet Vinyl Beneath Floor Tile	West side by former kitchen
7	Black Mastic	Under gray floor filler
1	Surfacing Texture on Drywall	Feed the Children-NE Wall
Basement	Fireproofing/Overspray	Throughout entire walls and ceilings
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Black Mastic	Throughout under all floor tile
	TSI – Fittings/Piping	Throughout
	Black Glue	Downtowner-Behind Wood Paneling
	Brown Glue	Downtowner-Behind Wood Paneling
	White Wall Texture	Escalator Area
	White Ceiling Texture	Escalator Area
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout
Sub-Basement	Vermiculite Wall Insulation	Fire Sprinkler Pump Room-Inside Drywall Wall Cavities
	Black Glue	Behind Mirrors in Cafeteria
	Gray with White Streaks 12"x12" Floor Tile and Black Mastic	Vault Floor
	Fireproofing/Overspray	Throughout entire walls and ceilings
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout

Lead-based paint containing materials and components are indicated in the LBP Surveys and noted in the following tables:

Table 7: LBP in First National Center –West Building

Sampling Location	Component	Substrate	Color
Throughout Building	Walls and Ceilings	Plaster	Various
Throughout Building	Window Frames	Metal	Brown, Black or White
Throughout Building	Door Frames	Metal	Black
Stairs	Stair Post	Metal	Black
Restroom	Stall Doors	Metal	Grey or Red
Stairwell	Door and Door Frame	Metal	Brown/Black
Restroom	Doors	Metal	Brown
16th Floor Elevator Rooms	DC Monitor	Metal	Green
Basement Vault	Walls and Ceiling	Metal	Grey and White
Basement Vault	Door Frame	Metal	Silver
Basement Room Main Hallway	Door	Wood	Brown
Basement Room Main Hallway	Door Jamb	Metal	Brown
Basement Room Main Hallway	Door	Wood	White
Basement Mechanical Room	CAT Generator	Metal	Yellow
Basement Mechanical Room	Sliding Barn Door	Metal	Green
Basement Mechanical Room	Sliding Barn Door	Metal	Silver
Basement Mechanical Room	Tank	Metal	White
Basement Main Stairwell Vault Entry	Mural	Plaster	Multi
Basement Outside Machine Room Hall	Door	Metal	Black
1st Floor Southeast Loading Exit	Loading Door	Metal	Brown
14th Floor Mechanical Room	Door	Metal	Tan

*Any components throughout the FNC-West Building described as above or similar should be treated as LBP.

Table 8: LBP in First National Center –Center Building

Sampling Location	Component	Substrate	Color
Sub-Basement Room 1	Door	Wood	Green
Basement Room 1	Tank and Pipes	Metal	Silver
Basement Room 19 (garage)	Pole	Metal	Yellow
Basement Room 19 (garage)	Parking Space Paint	Concrete	Yellow
10th Floor Room 1	Wall	Drywall	Brown
14th Floor Room 1	Vault Door	Metal	White

*Any components throughout the FNC-Center Building described as above or similar should be treated as LBP.

Table 9: LBP in First National Center –East Building

Sampling Location	Component	Substrate	Color
Sub-Basement Room 6	Elevator Shaft Cage	Metal	Orange
Sub-Basement Room 17	Water Pump Motor	Metal	Red
Sub-Basement Room 17	Wall Panel	Metal	Red
14th Floor Room 3	Boiler	Metal	Red
15th Floor Room 2	AHU Duct Cage	Metal	Tan
15th Floor Room 4	AHU Duct Cage	Metal	Tan

*Any components throughout the FNC-East Building described as above or similar should be treated as LBP.

2.7 SCHEDULE OF BROWNFIELDS REVOLVING LOAN SUBMITTALS

A schedule of the Brownfields Revolving Loan Fund submittals associated with this removal action is presented in Table 10.

Table 10: Schedule of Submittals

Task	Schedule
ABCA Submittal	February 2017
ABCA 30 day Public Notice	March 2017
Community Relations Plan	March 2017
QAPP Draft Submittal	March 2017
QAPP Final Submittal	May 2017

2.8 IDENTIFICATION AND ANALYSIS OF REMEDIAL ACTION ALTERNATIVES

This section describes three potential remedial action alternatives for addressing the contaminants at the FNC Property described in the ACM and LBP surveys. Following the description, each alternative is then evaluated in terms of effectiveness, implementability and cost.

The effectiveness of an alternative refers to its ability to meet the objectives of the removal action. Specific criteria used to assess the effectiveness of an alternative include the following:

- Overall protection of public health and the environment;
- Compliance with applicable or relevant and appropriate requirements (ARARs) and other criteria, advisories, and guidance;

- Long-term effectiveness and permanence;
- Reduction of toxicity, mobility, or volume through treatment, and
- Short-term effectiveness.

The implementability criterion addresses the technical and administrative feasibility of implementing an alternative, and the availability of various services and materials required during its implementation. Specific criteria used to assess the implementability of an alternative are:

- Technical feasibility;
- Administrative feasibility;
- Availability of services and materials;
- State acceptance, and
- Community acceptance.

Each alternative will be evaluated to estimate cost to implement. The evaluation will compare each alternative's capital and operation and maintenance (O&M) costs, if applicable.

The proposed alternatives are as follows:

Alternative 1: No Action.
Alternative 2: Abatement of all the Asbestos-Containing Materials (ACM) and removal or stabilization of LBP.
Alternative 3: Abatement of only accessible ACM and removal or stabilization of LBP.

2.8.1 ALTERNATIVE 1: NO ACTION

The No Action alternative was evaluated to provide a baseline to which the other alternatives can be judged. No Action means that no abatement would be performed to minimize or eliminate the potential hazards. The No Action Alternative would consist of leaving the FNC Property buildings in their current condition. In its current state, the Property cannot be used for the planned redevelopment. Although secured, there is the possibility the buildings could potentially be entered by trespassers. Actions from trespassers, such as starting fires for warmth, could release asbestos and possibly expose the public and contaminate the environment. There would be no mitigation of contaminant migration or exposure pathways under this alternative. No long-term monitoring or maintenance would be required under the No Action alternative.

2.8.1.1 EFFECTIVENESS

The No Action alternative does not reduce or address the asbestos or LBP in any manner. If no action is taken, in time the issues related to contamination and the likelihood of exposure would be expected to increase. This alternative does not enhance protection of public health and safety.

- **Overall Protection of Public Health and the Environment-** This alternative would leave all existing asbestos and lead in place, thereby leaving all potential exposure pathways intact. The potential for exposure would expect to increase over time if the building deteriorates. This alternative would provide no additional effective protection to public health or the environment.
- **Compliance with ARARs and Other Criteria, Advisories, and Guidance –** No ARARs or other criteria, advisories, and guidance were identified for the No Action alternative. The presence of asbestos within a building does not trigger a regulatory requirement to remove it.

- **Long-Term Effectiveness and Permanence-** The No Action alternative would provide no long-term effectiveness. Rather, the potential for exposure could increase over time due to the potential deterioration of the buildings.
- **Reduction of Toxicity, Mobility, or Volume through Treatment-** The No Action alternative would not result in a reduction of toxicity, mobility, or volume since there would be no treatment or handling of the building materials. Asbestos and lead in the building material, while not expected to increase in toxicity, could become more mobile over time due to the deterioration of the substrate.
- **Short-Term Effectiveness-** This alternative would have no short-term effectiveness as the regulated wastes would be left in place.

2.8.1.2 IMPLEMENTABILITY

There is no action necessary to implement this alternative.

- **Technical Feasibility-** There are no technical issues associated with the No Action alternative. **Administrative Feasibility-**There are no administrative issues associated with the No Action alternative.
- **Availability of Services and Materials-** There are no services or materials required for this alternative.
- **State Acceptance-** The ODEQ or ODOL has not mandated cleanup of this site, and the No Action alternative could be found acceptable provided no renovation or demolition was planned for the Property. However, future development of this Property would likely result in the State's rejection of the No Action alternative due to unaltered exposure pathways and the potential for those pathways to worsen over time.
- **Community Acceptance-** The No Action alternative would not be likely to gain public acceptance as this option would prevent redevelopment of the Property. In its current state, the Property is a potential attraction for trespassers which could raise concern for the local citizens.

2.8.1.3 COST

The No Action alternative would involve no direct or indirect capital costs, but there would be some expense associated with maintaining the building in a vacant status. However, the planned redevelopment could not proceed.

2.8.2 ALTERNATIVE 2: ABATEMENT OF ALL ACM AND STABILIZATION/REMOVAL OF LBP

Alternative Two would consist of the abatement and offsite disposal at a DEQ permitted landfill of all aforementioned asbestos and LBP. A Licensed Asbestos Supervisor will be required on site during all work hours to identify and segregate all potential ACM at the point of abatement. All ACM would be double bagged, sealed, and subsequently disposed at an offsite permitted landfill. Personnel monitoring and perimeter air monitoring would be required during abatement activities to determine whether airborne asbestos is a potential threat to workers on site or to areas outside of negative containment and downwind of the Property.

Lead-based paint would be stabilized or removed.

2.8.2.1 EFFECTIVENESS

This alternative is the only alternative that completely removes all of the asbestos from the Property. This option will offer protection to the public over time, because it permanently removes the asbestos from the buildings and stabilizes/removes LBP. As this option would be completed utilizing industry standards, the

engineering controls would adequately protect the public health and safety as well as protect the environment. This alternative would allow the prospective developer to renovate the building and meet their redevelopment goals.

- **Overall Protection of Public Health and the Environment-** The physical removal and offsite disposal of the ACM and stabilization/removal of LBP would achieve long-term protection of human health and the environment by eliminating the potential exposure pathways. Protection against worker exposure and potential offsite exposures during the removal action would be ensured through air monitoring, appropriate negative air containment for asbestos abatement, appropriate personal protective equipment for the workers within the building and proper offsite disposal.
- **Compliance with ARARs and other Criteria, Advisories, and Guidance** – ARARs that may be applicable to this alternative are identified in the Appendix.
- **Long-Term Effectiveness and Permanence-** The physical removal and offsite disposal of the ACM and stabilization/removal of LBP would achieve long-term protection of human health and the environment by eliminating the potential exposure pathways. The ACM would be double-bagged prior to disposal off site, thereby protecting human health and the environment during transportation to the disposal facility.
- **Reduction of Toxicity, Mobility, or Volume through Treatment-** No treatment to reduce the volume of waste will occur at this Property. Removal and off-site disposal of the asbestos would eliminate migration of contaminants at the site. Contaminated materials disposed off-site would be transported to landfills that are designed to prevent contaminant migration. The containerization (wrapping and bagging) and disposal of ACM would further reduce the mobility of asbestos fibers. Lead-based paint would be stabilized or removed.
- **Short-Term Effectiveness-** Abatement of ACM has the potential to release fugitive asbestos fibers into the air, which could leave the Property; however, the abatement of asbestos is heavily regulated and monitored. The regulations require that indoor asbestos be abated under negative air pressure ensuring that fibers released to the air do not leave the work area. All of the abatement work is conducted within an enclosure and the negative air pressure is attained through the use of specialized equipment that creates a partial vacuum within the containment area. Special personal protective equipment is necessary for workers within the containment. This alternative would include air sampling on the outside of the abatement area to ensure that no asbestos fibers are released. Dust suppression measures (such as wetting) would also be implemented as necessary to reduce the potential for exposure and off site releases. ODOL will conduct routine inspections during the abatement.

It is estimated that twelve months would be required to fully implement the alternative and achieve site protection.

2.8.2.2 IMPLEMENTABILITY

Asbestos removal must be conducted in accordance with all local, state, and Federal regulations. This includes but is not limited to the Oklahoma Asbestos Statutes and Abatement of Friable Asbestos Materials Rules, (OAC 380:50), State of Oklahoma DOL - Asbestos Division. Contractors performing asbestos abatement must be licensed by the Oklahoma Department of Labor (ODOL) and removal accomplished in

accordance with ODOL rules. Removal activities are under ODOL regulatory oversight and include removal of all friable asbestos containing material. In addition to the ODOL rules the following also apply:

-It is required by NESHAP, that ten business day advance notification to ODEQ for demolition of any structure, or removal of more than 160 square feet or 260 linear feet of Regulated ACM.

-An ODOL licensed asbestos abatement contractor must perform the work using only EPA-accredited and ODOL-licensed asbestos workers, with competent person supervision (5-day EPA accredited asbestos supervisor course).

-An Asbestos Project Design indicating abatement techniques, methods, and safety precautions must be written and approved in advance by the ODOL. An employee exposure assessment, inside area, outside containment barriers and clearance air monitoring are detailed in the Project Design.

-Disposal of Regulated ACM into approved landfill.

- **Technical Feasibility-** This alternative would be technically feasible and the required work is standard practice prior to demolition and renovation. There are many contractors who specialize in the abatement of asbestos and LBP removal/stabilization. No future O&M activities would be required for this alternative since the contaminants would be removed. This alternative would achieve long-term protection, which would allow the Property to be used for future development without land use restrictions.
- **Administrative Feasibility-** This alternative would require the onsite presence of a Licensed Asbestos Supervisor during all asbestos abatement activities and a Licensed Asbestos Inspector to identify and sample all potential ACM prior to processing. The asbestos contractor provides this expertise. All asbestos abatement in the State of Oklahoma is overseen by the ODOL. An asbestos work plan must be submitted to ODOL and approved prior to work commencing. Also, notification must be given to the ODEQ at least 10 days prior to abatement activities commencing.
- **Availability of Services and Materials-** This alternative requires the use of standard abatement equipment such as a negative pressure vacuum, containment walls, personal protective equipment, asbestos bags, hand tools, cutting torch, trucks for disposal, etc. Equipment and operators are readily available through multiple local contractors. All ACM would be transported to a properly permitted local landfill.
- **State Acceptance-** This alternative would likely be accepted by the state because it eliminates all potential exposure pathways and is a permanent remedy that is consistent with the redevelopment plans.
- **Community Acceptance-** Public acceptance of this alternative would be expected since the Property would be mitigated and utilized for redevelopment. Implementation of this alternative will eliminate a potential threat to human health and the environment and ultimately create a positive economic impact for the prospective developer and the surrounding community.

2.8.2.3 COST

The Estimated cost for the abatement of all asbestos and the removal or stabilization of LBP is estimated between $11.9 million and $12.7 million. There are no O&M costs associated with this alternative because all ACM will be removed.

2.8.3 ALTERNATIVE 3: ABATEMENT OF ONLY ACCESSIBLE ACM

Alternative 3 would consist of full abatement of only accessible ACM, encapsulation of inaccessible interior areas and the removal or stabilization of LBP.

A Licensed Asbestos Supervisor would be required on site during all work hours to identify and segregate all potential ACM at the point of encapsulation.

Personnel monitoring and perimeter air monitoring would be required during encapsulation activities to determine whether airborne asbestos is a potential threat to workers on site or to areas outside of negative containment and downwind of the Property.

2.7.3.1 EFFECTIVENESS

- **Overall Protection of Public Health and the Environment-** As with Alternative 2, the physical removal and offsite disposal of accessible ACM and encapsulation of inaccessible interior ACM would achieve protection of human health and the environment by eliminating potential exposure pathways. Protection against worker exposure and potential offsite exposures during the removal and encapsulation action would be ensured through air monitoring, appropriate negative air containment for asbestos abatement, appropriate personal protective equipment for the workers within the building and proper offsite disposal.
- **Compliance with ARARs and other Criteria, Advisories, and Guidance** – ARARs that may be applicable to this alternative are identified in the Appendix.
- **Long-Term Effectiveness and Permanence-** The physical removal and offsite disposal of the ACM would achieve long-term protection of human health and the environment by eliminating the potential exposure pathways. The ACM would be double-bagged prior to disposal off site, thereby protecting human health and the environment during transportation to the disposal facility. A long-term operation and monitoring (O&M) plan would be required for long-term effectiveness for ACM left in place.
- **Reduction of Toxicity, Mobility, or Volume through Treatment-** No treatment to reduce the volume of waste will occur at this site. Removal and off-site disposal of the asbestos would eliminate migration of contaminants at the site. Contaminated materials disposed off-site would be transported to landfills that are designed to prevent contaminant migration. The containerization (wrapping and bagging) and disposal of ACM would further reduce the mobility of asbestos fibers. Encapsulation for remaining ACM would limit mobility.
- **Short-Term Effectiveness-** Abatement of ACM has the potential to release fugitive asbestos fibers into the air, which could leave the site; however, the abatement of asbestos is heavily regulated and monitored. The regulations require that indoor asbestos be abated under negative air pressure ensuring that fibers released to the air do not leave the work area. All of the abatement work is conducted within an enclosure and the negative air pressure is attained through the use of specialized equipment that creates a partial vacuum within the containment area. Special personal protective equipment is necessary for workers within the containment. This alternative would include air sampling on the outside of the abatement area to ensure that no asbestos fibers are released. Dust suppression measures (such as wetting) would also be implemented as necessary to reduce the potential for exposure and off site releases. ODOL will conduct routine inspections during the abatement.

It is estimated that eleven months would be required to fully implement the alternative and achieve site protection.

2.8.3.2 IMPLEMENTABILITY

- **Technical Feasibility-** This alternative would be technically feasible and the required work is standard practice in the restoration/remodeling business. Long-term O&M activities would be required for this alternative since the interior inaccessible asbestos would be left in place. This alternative would achieve long-term protection, which would allow the structure to be used for future development; however, any maintenance work near unabated asbestos would require an ODOL-approved asbestos O&M plan.
- **Administrative Feasibility-** This alternative would require the onsite presence of a Licensed Asbestos Supervisor during all asbestos abatement and encapsulation activities and a licensed asbestos inspector to identify and sample all potential ACM prior to processing. All asbestos abatement in the State of Oklahoma is overseen by the ODOL, which makes the final determination that the site is free of asbestos. An asbestos work plan must be submitted to ODOL and approved prior to work commencing. Also, notification must be given to the OODEQ at least 10 days prior to abatement activities beginning.
- **Availability of Services and Materials-** This alternative requires the use of standard asbestos work equipment such as a negative pressure vacuum, containment walls, personal protective equipment, asbestos bags, hand tools, cutting torch, trucks for disposal, etc. Equipment and operators are readily available through multiple local contractors.
- **State Acceptance-** This alternative would likely be accepted by the State because it eliminates the potential exposure pathways for an extended period of time.
- **Community Acceptance-** Public acceptance of this alternative is likely since the implementation of this alternative will protect human health and the environment from asbestos and will redevelop the currently underutilized building.

2.8.3.3 COST

The total estimated cost for implementing Alternative 3 is approximately $10.25 million and $11.3 million. Partial abatement of asbestos would require on-going expenses related to monitoring and preparation of an asbestos O&M plan.

3.0 RECOMMENDED REMOVAL ACTION ALTERNATIVE

Due to the prohibitive costs associated with the abatement of all ACM throughout the building (Alternative 2); the abatement of all regulated ACM is not a viable option.

'No action' (Alternative 1) is also non-feasible as the potential for exposure continues to exist, and the building cannot be removed or renovated without prior removal of asbestos due to the likelihood asbestos would become airborne during demolition or renovation activities. In addition to creating a health hazard, demolition of the Property building without abating asbestos would be in violation of state and Federal regulations.

Based on all considerations, the selected and only feasible option is Alternative 3: Abatement of accessible ACM and removal or stabilization of LBP.

4.0 FINAL DECISION DOCUMENT

The City will document its determination in a Decision Document. If all requirements are met and the public has no major concerns about the project, the loan can go forward.

This ABCA will be available for public review and comment for 30 days, beginning on the date the notice of availability is published. Written comments may be submitted to the City during this comment period. The City will prepare a responsiveness summary for the comments received and determine whether to move forward in awarding the loan for this project. Any public comments received by the City on the document will be responded to and incorporated into the Final Decision Document for the Property. A copy of the approved Final Decision Document will also be included in the Site's administrative record.

The public notice for the Analysis of Brownfield Cleanup Alternatives (ABCA) will be published in the Daily Oklahoman. The public will have 30 days, from the date of publication, to submit comments to the City. Comments may be submitted to the City of Oklahoma City Brownfields Program, Planning Department (Attention: Amanda Alewine, 420 West Main Street, Oklahoma City, OK 73101; e-mail: Amanda.alewine@okc.gov, fax 405.316.1766)

The Administrative Record for the project is located with the Brownfields Coordinator on the 9th Floor of 420 West Main Street, Oklahoma City, Oklahoma. The ABCA, Community Relations Plan, Quality Assurance Project Plan, decision documents, public notices, summary of responses to public comments, and related plans and specifications can be reviewed from 8:00 a.m. to 5:00 p.m., Monday-Friday with the exception of state recognized holidays. Information may be obtained by contacting: Amanda Alewine, 420 West Main Street, Oklahoma City, OK 73101; e-mail: Amanda.alewine@okc.gov, fax 405.316.1766.

5.0 REFERENCES

Terracon. First National Center Asbestos Survey. 2014.

Terracon. First National Center Asbestos Survey. 2016.

Terracon. First National Center Hazardous Materials Assessment. 2016.

SCS Engineers and Family Environmental, First National Center –West Building Asbestos Verification Survey. January 2017.

SCS Engineers and Family Environmental, First National Center –Center Building Asbestos Verification Survey. January 2017.

SCS Engineers and Family Environmental, First National Center –East Building Asbestos Verification Survey. January 2017.

Marshall Environmental Management, First National Center-West Building LBP Survey. January 2017.

Marshall Environmental Management, First National Center-Center Building LBP Survey. January 2017.

Marshall Environmental Management, First National Center-East Building LBP Survey. January 2017.

APPENDIX A: Potential Applicable or Relevant and Appropriate Requirements

Potential Applicable or Relevant and Appropriate Requirements

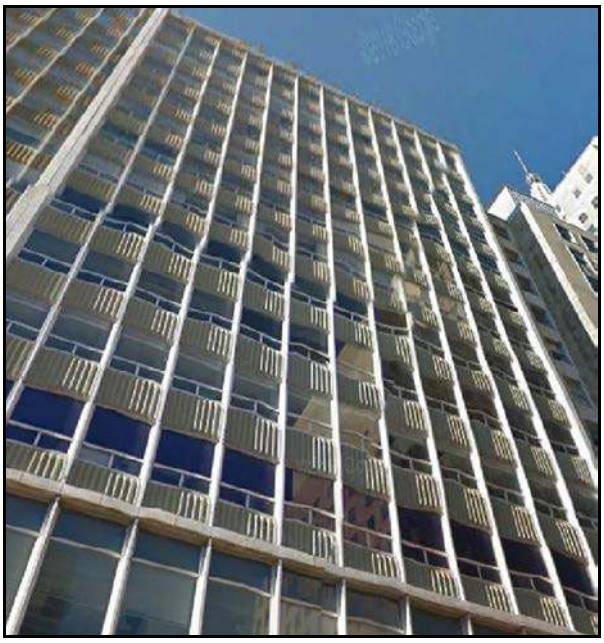
Potential ARARs for the First National Center Project	
ARAR	**Description**
FEDERAL REQUIREMENTS	
40 CFR 260-273	EPA RCRA regulations for identification, generation, treatment/storage/disposal, and transportation of hazardous wastes; state authorized programs
40 CFR 268	EPA RCRA land disposal restrictions
40 CFR 122.21, 122.26	EPA CWA storm water regulations, state programs
40 CFR 257, 258	EPA criteria for solid waste disposal facilities
40 CFR 116, 117	EPA CWA hazardous substances; reportable quantities
40 CFR 61	EPA CAA asbestos national emission standard for hazardous air pollutants (NESHAPs)
Clean Air Act Section 112(r)	EPA CAA hazardous air pollutants designated
40 CFR 68.130	EPA list of CAA hazardous substances
49 CFR 171-177	DOT hazardous materials transportation requirements
STATE OF OKLAHOMA REQUIREMENTS	
OAC 380:50	Oklahoma regulations for asbestos abatement; Department of Labor
OAC 252:100-41-16	Oklahoma emission standards for asbestos; Department of Environmental Quality
OAC 252:100	Oklahoma air pollution control rules; Department of Environmental Quality
OAC 252:100-41	Oklahoma regulations for hazardous air pollutants and toxic air contaminants; Department of Environmental Quality
OAC 252:205	Oklahoma hazardous waste management regulations; Department of Environmental Quality
OAC 165:30	Oklahoma hazardous waste transportation regulations; Oklahoma Corporation Commission
OAC 252:520	Oklahoma solid waste management regulations; Department of Environmental Quality
OAC 252:605	Oklahoma storm water regulations; Department of Environmental Quality

APPENDIX B: ACM Surveys

Asbestos Survey Verification

First National Center
Center Building-1957

120 North Robinson Street
Oklahoma City, Oklahoma 73102



Prepared For:

The City of Oklahoma City

420 W Main Street, Suite 920
Oklahoma City, OK 73102

Date Prepared:
January 16, 2017

Prepared By:

Family Environmental

SCS ENGINEERS

Table of Contents

1.0 INTRODUCTION

SCS Engineers (SCS) was contracted by the City of Oklahoma City, Oklahoma Planning Department to perform an asbestos survey within the First National Center (FNC), 120 North Robinson Avenue, Oklahoma City, Oklahoma (Property). The entire Property consists of three independently built structures: the West Building constructed in 1931, the Center Building constructed in 1957 and the East Building constructed in 1972. The extent of this asbestos survey verification is limited to the Center Building.

The FNC Center Building is planned for commercial and parking redevelopment. The redevelopment is expected to include demolition and renovation activities. As a part of cleanup planning activities prior to redevelopment, the SCS project team completed an Asbestos Survey Verification of previously completed asbestos surveys. Terracon Consultants, Inc. (Terracon) completed asbestos surveys in May 2014 and June 2016. The overall purpose of the asbestos survey verification was to review previously completed asbestos survey data; identify data gaps in the previously prepared asbestos survey reports; and resolve any identified data gaps via bulk sampling of additional building materials and laboratory analysis prior to the anticipated FNC Center Building demolition/renovation. The survey verification design team consisted of SCS and Family Environmental Compliance Services, Inc. (Family Environmental). The FNC Center Building survey verification activities were conducted on November 17, 2016. The findings of this survey did confirm and identify additional building materials containing asbestos at the FNC Center Building.

2.0 PREVIOUS ASBESTOS SURVEYS

2.1 Terracon Asbestos Surveys

Two asbestos surveys were completed for the Center Building at the FNC Property for prior prospective purchasers. These surveys were completed by Terracon in May 2014 and June 2016 for all three FNC Property buildings. The May 2014 Asbestos Survey, for the Center Building, identified the types of asbestos-containing material (ACM) present in the Center Building, but did not include building plans, sampling location drawings or photographs of confirmed ACM in the survey report. Table 1 below presents the ACM identified in the May 2014 survey report. The June 2016 survey, of all three buildings, provided additional information on estimated quantities of ACM, general locations of identified ACM, incorporated results and data from the 2014 survey and provided a revised abatement cost estimate. The 2016 Survey document also did not provide building plans, sampling location drawings or photographs of confirmed ACM. Copies of the previous Terracon asbestos surveys are available upon request. However, due to the size of the overall Terracon survey documents, copies were not appended to this report for review.

TABLE 1 – IDENTIFIED ASBESTOS-CONTAINING MATERIALS

Material Description	Material Location
Floor Tile and Mastic	Throughout Building
Duct Tape	14th Floor, 11th Floor, Risers
TSI-Piping / Fittings (steam, domestic water, chilled water, drain)	Mechanical And AHU Rooms, Pipe Chases Throughout Building
Gasket	Pump Room 14th Floor
Chillers	Pump Room 14th Floor
Duct Insulation	13th Floor AHU
Joint Compound	1st Floor Hallmark, 5th Floor, 10th Floor, 11th Floor, 12th Floor, 13th Floor, and 14th Floor
Window Caulk	Windows Throughout
Transite ®	Peg Board 14th Floor Mechanical Room Bathroom, Ground Floor Driveway
Acoustic Plaster	Basement-West of Vault
Fire Doors	Assumed-Throughout
Roofing Materials	Assumed-Roof

3.0 PREVIOUS ASBESTOS SURVEYS DATA GAPS

3.1 Identified Data Gaps

Following the review of the May 2014 and June 2016 Terracon asbestos survey reports, the SCS survey design team identified the following data gaps:

- No sample location drawings;
- No photographic documentation of positively identified ACM; and
- Missing or assumed building materials not sampled.

3.2 Resolution of Identified Data Gaps

To resolve the identified data gaps listed above, the SCS survey design team completed the following activities:

- Generate and provide sample location drawings for all additional building materials tested, see Figures – Asbestos Sample Location Maps;
- Collect and generate photographic documentation of newly identified ACM, see **Appendix E**; and;
- Compile a list of assumed or missing building materials to be sampled and analyzed for asbestos content.

4.0 VERIFICATION ASBESTOS SURVEY

4.1 Regulatory Overview

This ACM Verification survey was conducted in accordance United States Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA), 40 Code of Federal Regulations (CFR) Part 763; National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61; Occupational Safety and Health Administration (OSHA) Asbestos Standard for the Construction Industry 29 CFR 1910.1101; and OSHA Toxic and Hazardous Substances, Subpart Z – Asbestos 29 CFR 1910.1001. The ACM survey was completed by Mr. Michael Dustman with Family Environmental and Mr. Bryan Ross with SCS Engineers. Both Mr. Dustman and Mr. Ross are EPA AHERA accredited and State of Oklahoma-Certified Asbestos Building Inspectors. A copy of Mr. Dustman's and Mr. Ross's asbestos inspector licenses is presented in **Appendix A**.

NESHAP 40 CFR Part 61 regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, ACMs are classified as either Friable, Category I Non-Friable or Category II Non-Friable. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I Non-Friable ACM includes packings, gaskets, resilient floor coverings and asphaltic roofing products. Category II Non-Friable ACM are any materials other than Category I materials that contain greater than one percent asbestos.

Friable ACM, Category I Non-Friable ACM and Category II Non-Friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities is considered regulated asbestos-containing material (RACM). RACM must be removed prior to renovation or demolition activities regardless of the amount of asbestos materials present.

OSHA 29 CFR 1910.1101 regulates workplace exposure to asbestos. The OSHA Permissible Exposure Limit (PEL) requires that long-term employee exposure to airborne asbestos fibers be maintained below 0.1 fibers per cubic centimeter (f/cc) of air averaged over an eight-hour time period. The OSHA Excursion Limit (EL) requires that short-term employee exposure to airborne asbestos fibers must be below 1.0 f/cc averaged over a 30 minute time period. The OSHA standard classifies construction and maintenance activities which could disturb ACM, and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

4.2 Property Description

The FNC Center Building structure was constructed in 1957 and consists of approximately 170,000 square feet. This structure is a 14-story curtain wall and brick building with a basement. The SCS survey design team was provided generic floor plans for this survey for review and markup; see **Asbestos Sample Location Maps,** following this survey report.

4.3 Homogeneous Materials Assessment

The SCS survey team building inspectors developed an individual homogeneous material sampling list which identifies individual building materials present at the Property, see **Appendix B**. A homogeneous material area consists of building materials which appear similar throughout in terms of color, texture, and date of construction application. A homogeneous material sampling list is utilized during a survey to ensure all identified suspect building materials are sampled. The homogeneous materials list is comprised of friable surfacing materials, friable thermal systems insulation, and miscellaneous materials. Random suspect ACM samples are collected across each individual homogeneous material or in this case, specific materials that will be disturbed during microbial remediation activities. Once the homogeneous material sampling list was complete, a sample number scheme was developed which incorporated acronym descriptions of the building material to be sampled and a numerical value to track each homogeneous material.

4.4 Sample Number Assignment Methodology

The SCS survey team building inspector utilized a methodical, site-specific sampling identification (ID) number for all building material samples collected during the FNC Center Building survey verification. An example of the site-specific sampling ID number is listed below:

57^{A}-1^{B}-1^{C}-1^{D}

A. Building construction date identifier;
B. Floor where the building material was sampled;
C. Building material homogeneous material number;
D. Assigned sequential value identifying the total number of samples collected.

4.5 Friability Assessment

An assessment of each homogeneous building material of suspect ACM was conducted to determine the general condition and friability of each building material. The EPA defines a friable material as one which, when dry, can be crumbled, pulverized or reduced to powder by

hand pressure. Non-friable materials do not meet this criterion. Friability was assessed by the building inspector by physically touching all building materials prior to sampling.

4.6 Bulk Sample Collection

Possible ACMs include nearly all building materials except glass, metal, and wood. An appropriately attired building inspector collected suspected ACM samples using wet methods, as applicable to reduce the potential for fiber release. Collected samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker. The building inspectors identified a total of **24** different homogeneous building materials to be sampled and collected a total of **72** bulk samples across the identified homogeneous building materials at the FNC Center Building. Friable and non-friable samples were collected during survey activities. A sample summary sheet of all samples collected during this ACM Verification survey is presented in **Appendix C** which, details the building materials containing asbestos and the associated asbestos percentage.

4.7 Laboratory Information

Building material samples were submitted under proper chain-of-custody procedures to River North Environmental Testing, Inc. (RNET) of Denver, Colorado, for analysis by polarized light microscopy (PLM) with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). Microscopical visual estimation was used in obtaining the percentage of asbestos in the bulk samples. RNET is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), code 200448-0. **Appendix D** contains these analytical results.

4.8 Newly Identified or Confirmed ACM

As discussed in Section 3.2, Resolution of Identified Data Gaps, additional bulk sampling or confirmation bulk sampling was conducted to fully identify ACM located in the FNC Center Building. Table 2 below, lists newly identified or confirmed ACMs located in the FNC Center Building. The information listed in Table 1 and Table 2 should be utilized to develop an appropriate asbestos abatement design prior to building demolition/renovation activities. Photographic documentation of positive ACM identified during this verification survey is located in **Appendix E**.

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM

Material Description	Area	Floor	Location
Tan 9”x9” floor tile with black mastic	NE Office	14	Floor
Black floor tile mastic	NE Break Room	13	Floor

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM			
Material Description	**Area**	**Floor**	**Location**
White wall texture	North Suite	12	Walls
White ceiling texture	North Suite	12	Ceiling

4.9 Presumed ACM

Presumed ACM (PACM), suspect ACM or assumed ACM are those building materials not sampled during an asbestos survey and assumed to contain asbestos based upon the following criteria:

- Prior knowledge obtained during previous asbestos survey execution which identified like building materials as asbestos-containing with subsequent laboratory analysis confirmation;
- The presumed material is defined as asbestos-containing TSI or surfacing material; and
- The building material is suspected to contain asbestos is based upon the estimated material manufacture and installation date.

The SCS survey team reviewed previous Terracon asbestos surveys for the FNC Center Building which listed all fire doors and roofing materials as assumed ACM. In addition to the assumed ACM listed in the Terracon surveys, the survey team observed the following building materials at the Property and assumed them to contain asbestos: **pipe gaskets, TSI, any/all electrical components and all elevator components**. An attempt was made to survey all areas of the FNC Center Building and collect bulk samples of building materials suspected of containing asbestos. However, building materials located within wall cavities, void spaces or otherwise concealed and inaccessible to the survey team at the time of sampling are assumed to be asbestos-containing until tested and proven otherwise.

5.0 CONFIRMATION OF PREVIOUSLY ABATED AREAS

During on-site survey activities at the FNC Center Building and following an interview conducted with Mr. Brian Taulbee, FNC maintenance supervisor, it was discovered that areas of the adjoining East Building have undergone previous partial asbestos abatement activity. Based on the East Building abatement information, Mr. Taulbee was questioned whether areas of the Center Building were also previously abated. According to Mr. Taulbee's knowledge, no asbestos abatement activity has been conducted within the Center Building.

6.0 REMAINING ASBESTOS ABATEMENT MATERIALS

Floors and areas within the FNC Center Building and designated ACM still requiring asbestos abatement are listed in Table 3-Remaining Asbestos Abatement Areas. The ACM materials listed are those materials identified in the Terracon survey reports and newly identified/confirmed materials discovered during this verification asbestos survey which will require proper asbestos abatement.

TABLE 3 – REMAINING ASBESTOS ABATEMENT AREAS

Floor(s)	Remaining ACM	Location(s)
All	Floor Tile and Mastic	Throughout Building
All	Duct Tape	Throughout Building
All	TSI – Piping/Fittings	Throughout Building
All	Pipe Gaskets	Throughout Building
14	Chillers	Pump Room
All	Duct Insulation	Throughout Building
14-10, 5, 1	Joint Compound	Walls and Ceilings
12	White Wall Texture	North Suite
12	White Ceiling Texture	North Suite
All	Window Caulk	Windows Throughout
14, 4, 1	Transite ® Peg Board	14-Mechanical Room Bathroom, 4-Raised Computer Floor-West Wall, & 1st Floor Driveway
Basement	Acoustic Plaster	West of Vault
All	Fire Doors	Assumed Throughout
Roof	Roofing Materials	Assumed
All	Electrical Components	Assumed Throughout
All	Elevator Components	Penthouses, Cars, Doors, and Shafts

7.0 FINDINGS & CONCLUSIONS

7.1 Survey Findings

The findings of this asbestos verification survey, complied by the SCS survey design team, identified data gaps within the previously prepared asbestos surveys. The identified data gaps were resolved through a comprehensive building walk-through; additional on-site material bulk sampling; photograph collection; preparation of sample location drawings; and on-site interviews with FNC maintenance personnel. Following the collection of additional material samples, this survey identified or confirmed ACM within existing building materials, not listed in the previous surveys. The FNC maintenance personnel interviews were conducted to better understand areas within the Center Building that may have been previously abated. Without knowledge of previous abatement information provided by FNC personnel, the SCS survey design team was not able to eliminate asbestos abatement areas within the Center Building, and all ACM listed in Table 3 should be considered accurate as to the list of materials required for proper asbestos abatement.

7.2 Survey Conclusions

Based on the findings of this verification survey, it is our professional opinion, that prior to building demolition/renovation activities, full abatement of identified ACM should be anticipated for the building materials identified in Table 3.

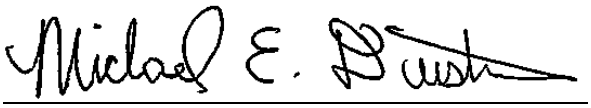
8.0 RECOMMENDATIONS

The SCS project team recommends a State of Oklahoma-Licensed and qualified asbestos abatement contractor conduct proper abatement of the Property structure prior to any building demolition/renovation activities. Additionally, we recommend an asbestos abatement project design be prepared by a State of Oklahoma-licensed project designer prior to conducting any abatement activity. The Oklahoma Department of Labor (ODOL) must approve all asbestos abatement designs prior to commencement of abatement activity.

9.0 LIMITATIONS

This asbestos verification survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. All results, findings, conclusions and recommendations expressed in this report are based on conditions observed during our survey of the Property. The information contained in this report is relevant to the date on which this survey was performed, and should not be relied upon to represent conditions at a later date. This report has been prepared on behalf of and exclusively for use by the Client for specific application to their project as discussed. This report is not a bidding document. All contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. SCS and Family Environmental does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied is made.

This asbestos verification survey report was prepared by:



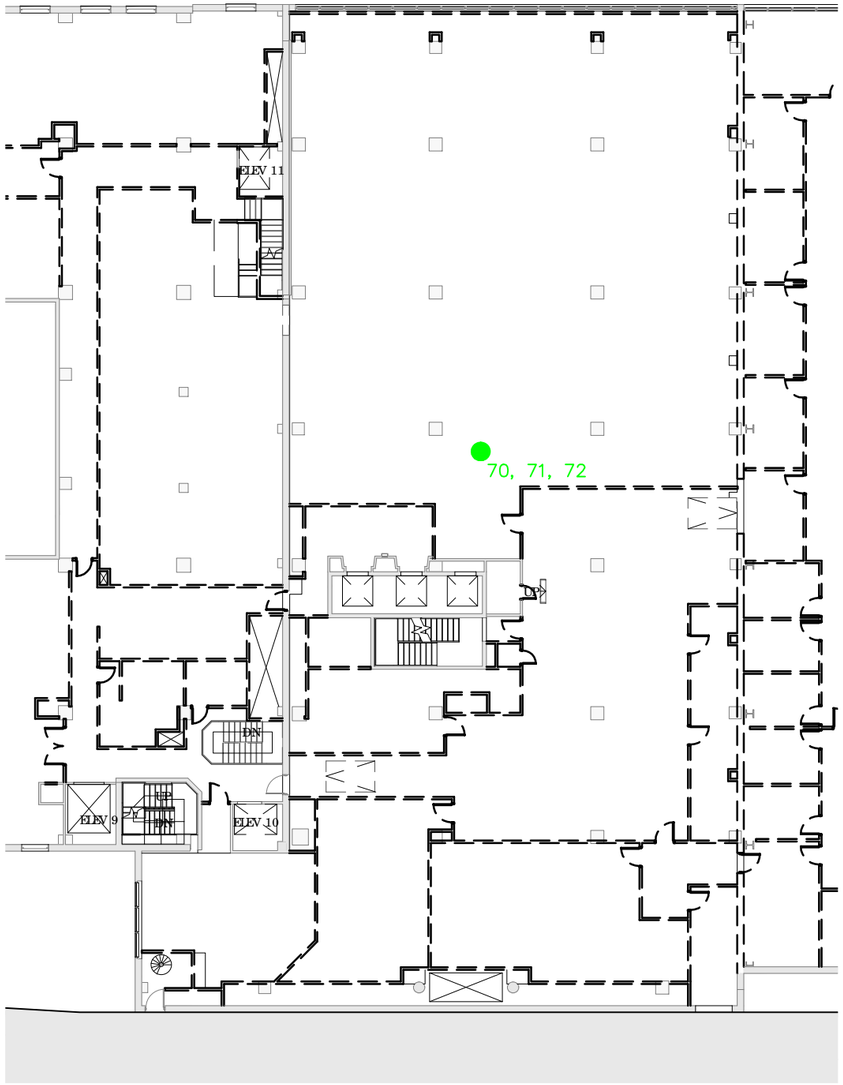
Date: January 16, 2017

Michael E. Dustman

Family Environmental Compliance Services, Inc.
600 East 8th Street, Suite B
Kansas City, Missouri 64106
Phone: (816) 527-0101

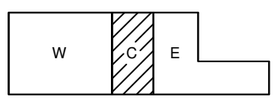
FIGURES

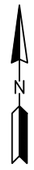
ASBESTOS SAMPLE LOCATION MAPS



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





NOT TO SCALE

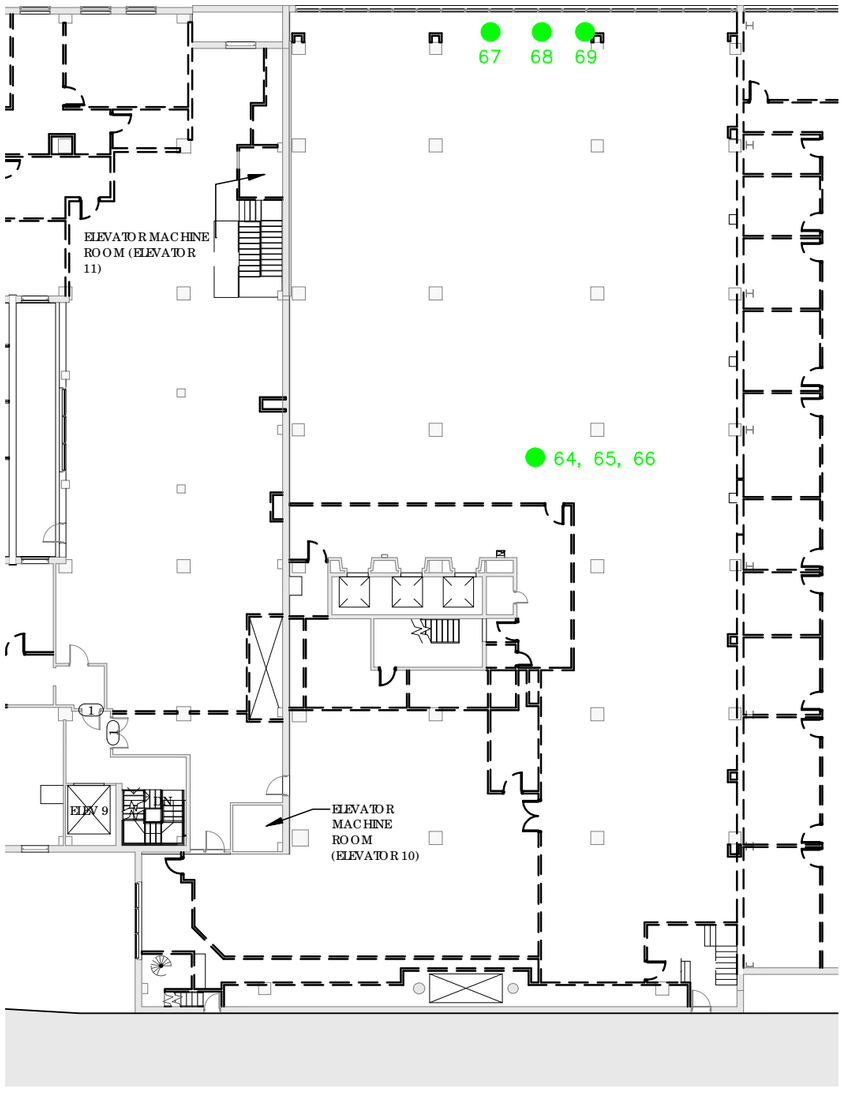
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT
CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

FOURTH FLOOR
ACM SAMPLE LOCATION MAP

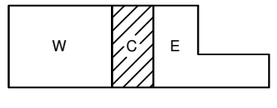
CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\FNC-Center Sample Locations Maps.dwg



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

FIFTH FLOOR
ACM SAMPLE LOCATION MAP

CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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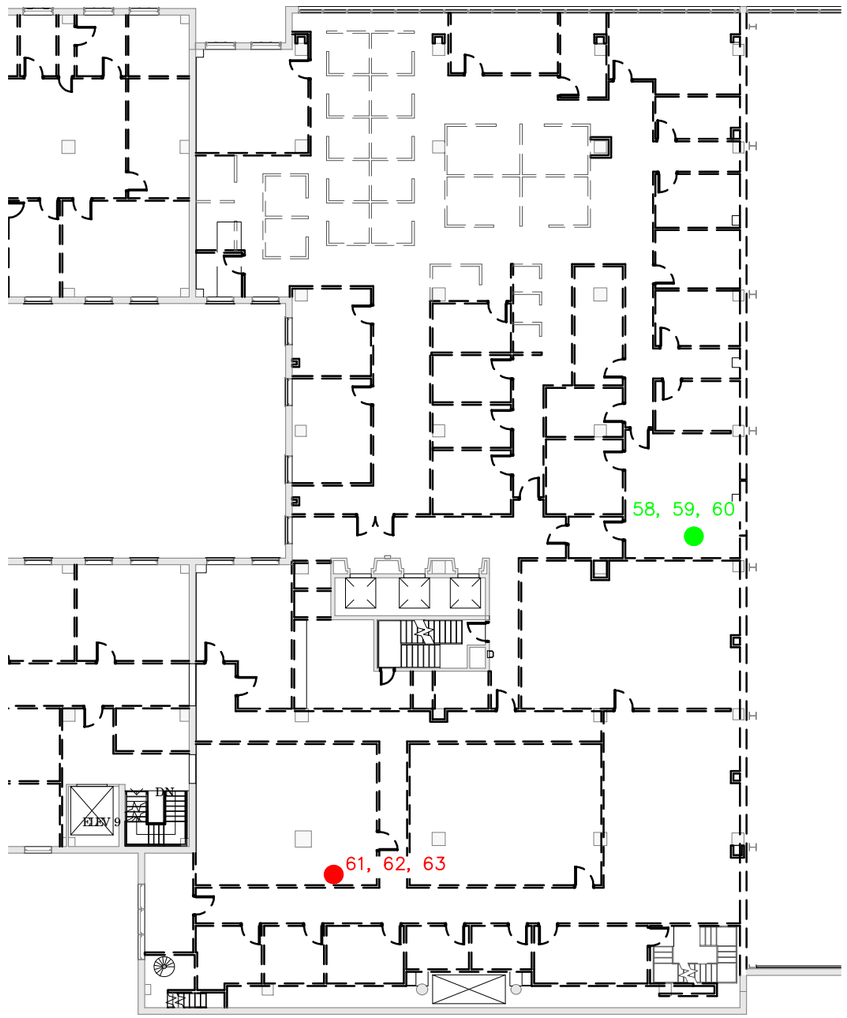
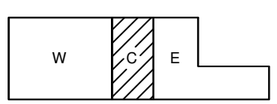
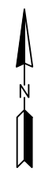


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





NOT TO SCALE

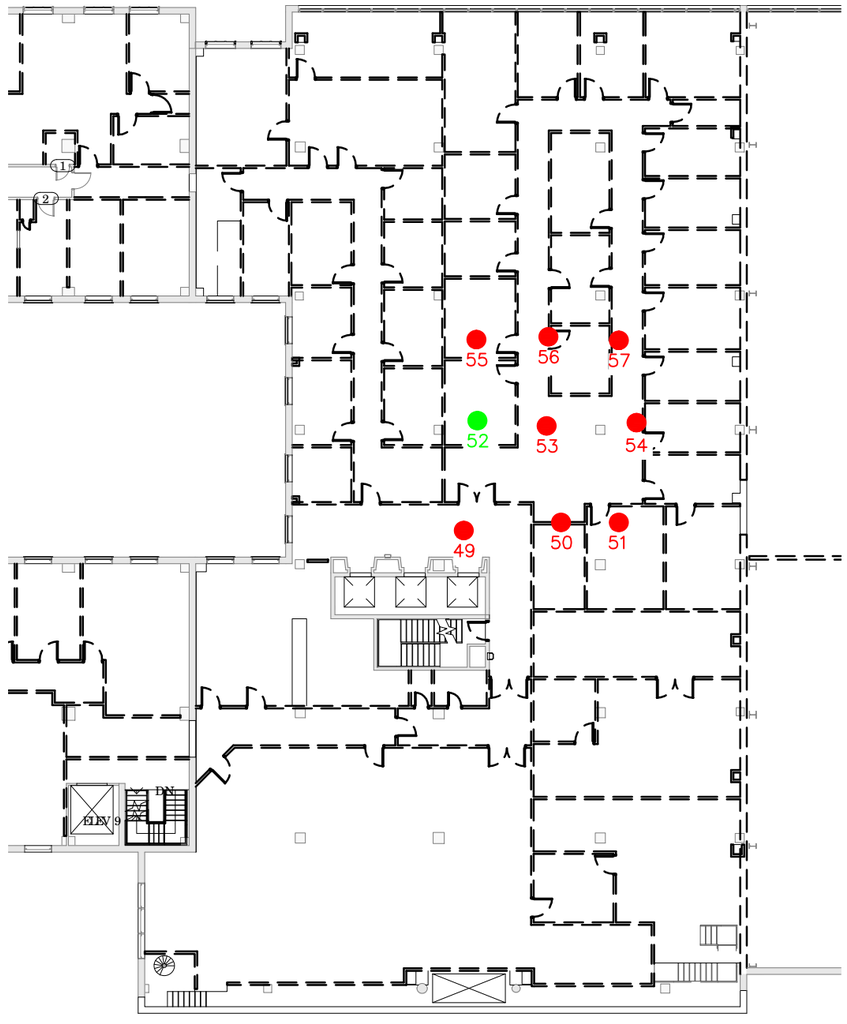
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

SEVENTH FLOOR
ACM SAMPLE LOCATION MAP

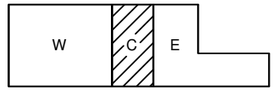
CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\FNC-Center Sample Locations Maps.dwg



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

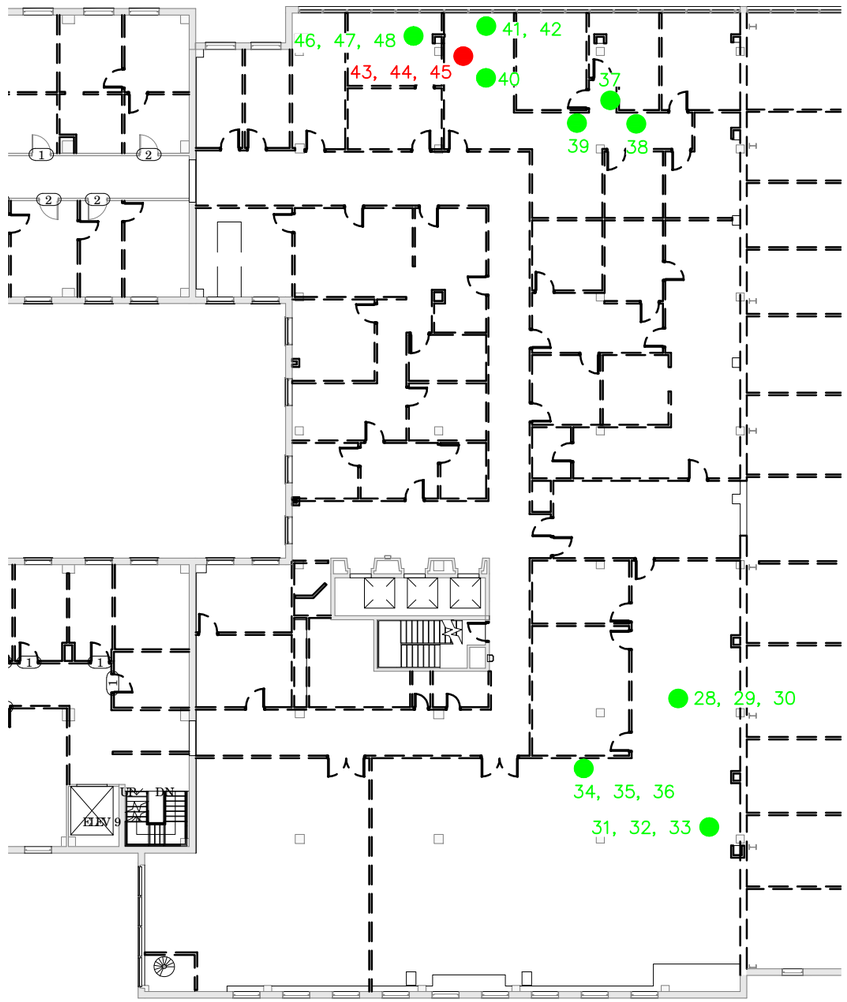
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

TWELFTH FLOOR
ACM SAMPLE LOCATION MAP

CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\FNC-Center Sample Locations Maps.dwg



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**

NOT TO SCALE

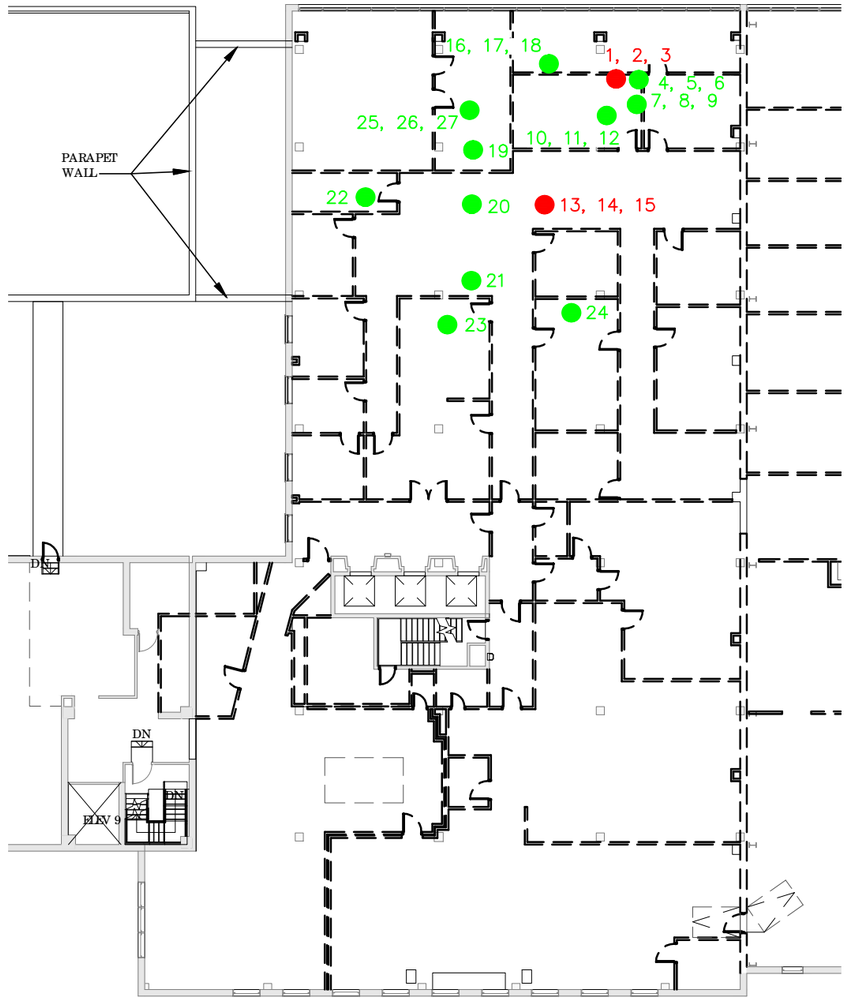
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

THIRTEENTH FLOOR
ACM SAMPLE LOCATION MAP

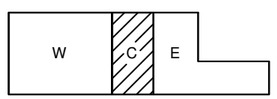
CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

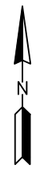
N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\FNC-Center Sample Locations Maps.dwg



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





NOT TO SCALE

SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT
CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

FOURTEENTH FLOOR
ACM SAMPLE LOCATION MAP

CENTER BUILDING (1957)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings--27216166.00\FNC-Center Sample Locations Maps.dwg

APPENDIX A

ASBESTOS INSPECTOR'S LICENSES

Oklahoma Department of Labor

Asbestos License

This certifies that **Michael Dustman**
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:

Project Designer

Melissa M. Houston,
Labor Commissioner

License # : 401745
Expires : 02/10/2017
Issued : 11/17/2016

Not intended for identification purposes

Oklahoma Department of Labor

Asbestos License

This certifies that **Michael Dustman**
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:

Inspector

Melissa M. Houston,
Labor Commissioner

License # : 400894
Expires : 02/11/2017
Issued : 11/14/2016

Not intended for identification purposes

Oklahoma Department of Labor
Asbestos License

This certifies that **Bryan Ross**
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:

Inspector

Melissa M. Houston,
Labor Commissioner

License # :400692
Expires :11/01/2017
Issued :11/14/2016

Not intended for identification purposes

APPENDIX B

HOMOGENEOUS AREAS TABLE

HOMOGENEOUS MATERIALS LIST
FIRST NATIONAL CENTER
(CENTER BUILDING-1957)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

No.	Material Description
1	Tan 9x9 FT-black mastic
2	White floor leveler
3	White 12x12 pencil hole CT-brown glue dot
4	White 2x2 Pinhole/fissure/potmark CT
5	Brown 2" cove base-brown mastic
6	Brown wood pattern 12x12 FT-clear mastic
7	Yellow/black carpet mastic
8	Tan painted DWJC
9	Blue painted column wall plaster
10	White w/blk-red streak 12x12 FT-blk mast.
11	Brown 4" cove base-brown mastic
12	Yellow wall mastic
13	White wall texture
14	White wall texture
15	Tan cove base-yelow mastic
16	Dark gray 4" cove base-yellow/brown mast.
17	White wall texture
18	White ceiling texture
19	Brown 4" cove base-brown mastic
20	Green 4" cove base-yellow/brown mastic
21	White 4" cove base-yellow mastic
22	White 2'x4' pinhole/potmark CT
23	Window glazing
24	White 2'x2' computer floor laminate

Highlight = Positive for asbestos

APPENDIX C

ACM SAMPLE SUMMARY SHEET

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(CENTER BUILDING-1957)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
57-14-1-1	Tan 9x9 FT-black mastic	NE Office	14	Floor	Fair	No	Chrysotile	Floor Tile = 5% Black Mastic = 10%
57-14-1-2	Tan 9x9 FT-black mastic	NE Office	14	Floor	Fair	No		PS-NA
57-14-1-3	Tan 9x9 FT-black mastic	NE Office	14	Floor	Fair	No		PS-NA
57-14-2-4	White floor leveler	NE Office	14	Floor	Fair	Yes	ND	ND
57-14-2-5	White floor leveler	NE Office	14	Floor	Fair	Yes	ND	ND
57-14-2-6	White floor leveler	NE Office	14	Floor	Fair	Yes	ND	ND
57-14-3-7	White 12x12 pencil hole CT-brown glue dot	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-3-8	White 12x12 pencil hole CT-brown glue dot	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-3-9	White 12x12 pencil hole CT-brown glue dot	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-4-10	White 2x2 Pinhole/fissure/potmark CT	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-4-11	White 2x2 Pinhole/fissure/potmark CT	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-4-12	White 2x2 Pinhole/fissure/potmark CT	NE Office	14	Ceiling	Fair	Yes	ND	ND
57-14-5-13	Brown 2" cove base-brown mastic	Open Area	14	Blue wall outside NE Office	Fair	No	ND	ND
57-14-5-14	Brown 2" cove base-brown mastic	Open Area	14	Blue wall outside NE Office	Fair	No	ND	ND
57-14-5-15	Brown 2" cove base-brown mastic	Open Area	14	Blue wall outside NE Office	Fair	No	ND	ND
57-14-6-16	Brown wood pattern 12x12 FT-clear mastic	N. Center Office	14	Bar area floor	Fair	No	ND	ND
57-14-6-17	Brown wood pattern 12x12 FT-clear mastic	N. Center Office	14	Bar area floor	Fair	No	ND	ND
57-14-6-18	Brown wood pattern 12x12 FT-clear mastic	N. Center Office	14	Bar area floor	Fair	No	ND	ND
57-14-7-19	Yellow/black carpet mastic	Open Area	14	Under brown Berber carpet	Fair	No	ND	ND
57-14-7-20	Yellow/black carpet mastic	Open Area	14	Under brown Berber carpet	Fair	No	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(CENTER BUILDING-1957)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
57-14-7-21	Yellow/black carpet mastic	Open Area	14	Under brown Berber carpet	Fair	No	ND	ND
57-14-8-22	Tan painted DWJC	Office Wall	14	Wall	Fair	No	ND	ND
57-14-8-23	Tan painted DWJC	Office Wall	14	Wall	Fair	No	ND	ND
57-14-8-24	Tan painted DWJC	Office Wall	14	Wall	Fair	No	ND	ND
57-14-9-25	Blue painted column wall plaster	Center Office	14	West wall	Fair	No	ND	ND
57-14-9-26	Blue painted column wall plaster	Center Office	14	West wall	Fair	No	ND	ND
57-14-9-27	Blue painted column wall plaster	Center Office	14	West wall	Fair	No	ND	ND
57-13-10-28	White w/blk-red streak 12x12 FT-blk mast.	Floor	13	NE break room	Fair	No	Chrysotile	Floor Tile = ND Black Mastic = 5%
57-13-10-29	White w/blk-red streak 12x12 FT-blk mast.	Floor	13	NE break room	Fair	No		PS-NA
57-13-10-30	White w/blk-red streak 12x12 FT-blk mast.	Floor	13	NE break room	Fair	No		PS-NA
57-13-11-31	Brown 4" cove base-brown mastic	SE Room	13	East wall	Fair	No	ND	ND
57-13-11-32	Brown 4" cove base-brown mastic	SE Room	13	East wall	Fair	No	ND	ND
57-13-11-33	Brown 4" cove base-brown mastic	SE Room	13	East wall	Fair	No	ND	ND
57-13-12-34	Yellow wall mastic	SE Room	13	South wall behind carpet	Fair	No	ND	ND
57-13-12-35	Yellow wall mastic	SE Room	13	South wall behind carpet	Fair	No	ND	ND
57-13-12-36	Yellow wall mastic	SE Room	13	South wall behind carpet	Fair	No	ND	ND
57-13-13-37	White wall texture	Suite 1384	13	Wall	Fair	Yes	ND	ND
57-13-13-38	White wall texture	Suite 1384	13	Wall	Fair	Yes	ND	ND
57-13-13-39	White wall texture	Suite 1384	13	Wall	Fair	Yes	ND	ND
57-13-14-40	White wall texture	Suite 1382	13	Wall	Fair	Yes	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(CENTER BUILDING-1957)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
57-13-14-41	White wall texture	Suite 1382	13	Wall	Fair	Yes	ND	ND
57-13-14-42	White wall texture	Suite 1382	13	Wall	Fair	Yes	ND	ND
57-13-15-43	Tan cove base-yelow mastic	Suite 1382	13	Wall	Good	No	ND	ND
57-13-15-44	Tan cove base-yelow mastic	Suite 1382	13	Wall	Fair	No	ND	ND
57-13-15-45	Tan cove base-yelow mastic	Suite 1382	13	Wall	Fair	No	ND	ND
57-13-16-46	Dark gray 4" cove base-yellow/brown mast.	Suite 1380	13	Wall	Fair	No	ND	ND
57-13-16-47	Dark gray 4" cove base-yellow/brown mast.	Suite 1380	13	Wall	Fair	No	ND	ND
57-13-16-48	Dark gray 4" cove base-yellow/brown mast.	Suite 1380	13	Wall	Fair	No	ND	ND
57-12-17-49	White wall texture	North Suite	12	Walls of suite north of elevator lobby	Fair	Yes	Chrysotile	Trace, verified by point count
57-12-17-50	White wall texture	North Suite	12	Walls of suite north of elevator lobby	Fair	Yes		Trace, verified by point count
57-12-17-51	White wall texture	North Suite	12	Walls of suite north of elevator lobby	Fair	Yes		Trace, verified by point count
57-12-18-52	White ceiling texture	North Suite	12	Ceiling of suite north of elevator lobby	Fair	Yes	Chrysotile	Trace, verified by point count
57-12-18-53	White ceiling texture	North Suite	12	Ceiling of suite north of elevator lobby	Fair	Yes		Trace, verified by point count
57-12-18-54	White ceiling texture	North Suite	12	Ceiling of suite north of elevator lobby	Fair	Yes		Trace, verified by point count
57-12-19-55	Brown 4" cove base-brown mastic	North Suite	12	Wall	Fair	No	ND	ND
57-12-19-56	Brown 4" cove base-brown mastic	North Suite	12	Wall	Fair	No	ND	ND
57-12-19-57	Brown 4" cove base-brown mastic	North Suite	12	Wall	Fair	No	ND	ND
57-7-20-58	Green 4" cove base-yellow/brown mastic	Break Room	7	Wall	Fair	No	ND	ND
57-7-20-59	Green 4" cove base-yellow/brown mastic	Break Room	7	Wall	Fair	No	ND	ND
57-7-20-60	Green 4" cove base-yellow/brown mastic	Break Room	7	Wall	Fair	No	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(CENTER BUILDING-1957)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
57-7-21-61	White 4" cove base-yellow mastic	SW Room	7	Wall	Fair	No	ND	ND
57-7-21-62	White 4" cove base-yellow mastic	SW Room	7	Wall	Fair	No	ND	ND
57-7-21-63	White 4" cove base-yellow mastic	SW Room	7	Wall	Fair	No	ND	ND
57-5-22-64	White 2'x4' pinhole/potmark CT	Center Area	5	Ceiling	Fair	Yes	ND	ND
57-5-22-65	White 2'x4' pinhole/potmark CT	Center Area	5	Ceiling	Fair	Yes	ND	ND
57-5-22-66	White 2'x4' pinhole/potmark CT	Center Area	5	Ceiling	Fair	Yes	ND	ND
57-5-23-67	Window glazing	N. Center Window	5	North window	Fair	No	ND	ND
57-5-23-68	Window glazing	N. Center Window	5	North window	Fair	No	ND	ND
57-5-23-69	Window glazing	N. Center Window	5	North window	Fair	No	ND	ND
57-4-24-70	White 2'x2' computer floor laminate	Raised Floor	4	Middle of floor	Fair	No	ND	ND
57-4-24-71	White 2'x2' computer floor laminate	Raised Floor	4	Middle of floor	Fair	No	ND	ND
57-4-24-72	White 2'x2' computer floor laminate	Raised Floor	4	Middle of floor	Fair	No	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

APPENDIX D

LABORATORY PLM ANALYTICAL DATA

River North Environmental Testing, Inc.
3650 Chestnut Place
Denver, CO 80216
www.rnetesting.com
303-297-0079
Fax: 303-292-1451
info@rnetesting.com

11/21/2016

Family Environmental, K.C.
600 East 8th Street, Suite B
Kansas City, MO 64106

Re: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73101 (1957-Center Building)
PLM16-528

Mr. Dustman,
Attached are the results of Polarized Light Microscopic (PLM) analysis for asbestos contained in the bulk sample materials submitted to this facility on 11/21/2016

Bulk samples are analyzed in accordance with USEPA test method EPA/600/M4-82-020 and EPA/600/R-93/116, which requires that distinctly different materials or layers present within a sample be analyzed and reported separately. (For measurement uncertainty, refer to table 2.1 in EPA/600/R-93/116 method.) Sometimes it is not possible to completely separate thin or strongly adhering layers, such as paint or adhesive, and a combined result is given. For some complex materials, such as drywall/tape/mud joints, a composite or overall asbestos content may be reported in addition to individual layer results. RNET, Inc. is currently accredited for bulk asbestos analysis by the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST). Our NVLAP laboratory code number is 200448-0.

Due to the limitations of the EPA 600 Method, nonfriable organically bound materials (NOBs) such as floor tiles can be difficult to analyze via PLM. EPA recommends that all NOBs reported as non-detect by PLM analysis be further analyzed by Transmission Electron Microscopy for more definitive results. Please note that the PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation.

The analytical results provided in this report apply only to the samples submitted to the laboratory. This report is confidential. Details of this report will not be discussed with any person or agency not associated with you or your organization. This report must be reproduced in its entirety and shall not be copied in part or used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples will be held for a minimum of sixty days unless longer storage is requested. If you have any questions regarding the content of this report please call RNET, Inc. at 303-296-6022.

Marissa Urdiales
Asbestos Analyst
murdiales@familyenvironmental.com
Cell: 719-214-2837

Katie I Shaw
PLM Laboratory Manager/Asbestos Analyst
kshaw@familyenvironmental.com
Cell: 307-631-4020

NVLAP Lab Code 200448-0

River North Environmental Testing, Inc.
3650 Chestnut Place
Denver, CO 80216
www.rnetesting.com
303-297-0079
Fax: 303-292-1451
info@rnetesting.com

REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-01						
57-14-1-1	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 90%	Chrysotile	5%	Resin	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	Chrysotile	10%	Resin	100%
PLM16-528-02						
57-14-1-2	Not Analyzed-First Positive Stop					
PLM16-528-03						
57-14-1-3	Not Analyzed-First Positive Stop					
PLM16-528-04						
57-14-2-4	Cement, Gray, Homogeneous, Hard	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-05						
57-14-2-5	Cement, Gray, Homogeneous, Hard	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-06						
57-14-2-6	Cement, Gray, Homogeneous, Hard	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-07						
57-14-3-7	LAYER 1 Ceiling Tile, White and Brown, Homogeneous, Fibrous	LAYER 1 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	90% 10%
	LAYER 2 Glue Dot, Brown, Homogeneous, Resinous	LAYER 2 20%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-08						
57-14-3-8	LAYER 1 Ceiling Tile, White and Brown, Homogeneous, Fibrous	LAYER 1 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	90% 10%
	LAYER 2 Glue Dot, Brown, Homogeneous, Resinous	LAYER 2 20%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-09						
57-14-3-9	LAYER 1 Ceiling Tile, White and Brown, Homogeneous, Fibrous	LAYER 1 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	90% 10%
	LAYER 2 Glue Dot, Brown, Homogeneous, Resinous	LAYER 2 20%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-10						
57-14-4-10	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-528-11						
57-14-4-11	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-528-12						
57-14-4-12	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-528-13						
57-14-5-13	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-14						
57-14-5-14	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-15						
57-14-5-15	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-16						
57-14-6-16	LAYER 1 Floor Tile, Wood Plank, Homogeneous, Resinous	LAYER 1 98%	None Detected		Resin	100%
	LAYER 2 Mastic, Clear, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-528-17						
57-14-6-17	LAYER 1 Floor Tile, Wood Plank, Homogeneous, Resinous	LAYER 1 98%	None Detected		Resin	100%
	LAYER 2 Mastic, Clear, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-528-18						
57-14-6-18	LAYER 1 Floor Tile, Wood Plank, Homogeneous, Resinous	LAYER 1 98%	None Detected		Resin	100%
	LAYER 2 Mastic, Clear, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-528-19						
57-14-7-19	LAYER 1 Foam, Black, Homogeneous, Spongy	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-20						
57-14-7-20	LAYER 1 Foam, Black, Homogeneous, Spongy	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. / Sample ID	Description	Layer No. / Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-21						
57-14-7-21	LAYER 1 Foam, Black, Homogeneous, Spongy	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-22						
57-14-8-22	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud with Paint, White and Tan, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-23						
57-14-8-23	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud with Paint, White and Tan, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-24						
57-14-8-24	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud with Paint, White and Tan, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-25						
57-14-9-25	LAYER 1 Plaster Base, Gray, Homogeneous, Coarse Grained	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	Trace 100%
	LAYER 2 Plaster Skim Coat with Paint, White and Blue, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-26						
57-14-9-26	LAYER 1 Plaster Base, Gray, Homogeneous, Coarse Grained	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	Trace 100%
	LAYER 2 Plaster Skim Coat with Paint, White and Blue, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-27						
57-14-9-27	LAYER 1 Plaster Base, Gray, Homogeneous, Coarse Grained	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	Trace 100%
	LAYER 2 Plaster Skim Coat with Paint, White and Blue, Non-homogeneous, Fine Grained	LAYER 2 30%	None Detected		Other Non-Fibrous Material	100%
PLM16-528-28						
57-13-10-28	LAYER 1 Mastic, Tan, Homogeneous, Resinous	LAYER 1 70%	Chrysotile	5%	Resin	95%
	LAYER 2 Floor Tile, Black, Homogeneous, Resinous	LAYER 2 30%	None Detected		Resin	100%
PLM16-528-29						
57-13-10-29	Not Analyzed-First Positive Stop					
PLM16-528-30						
57-13-10-30	Not Analyzed-First Positive Stop					
PLM16-528-31						
57-13-11-31	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown and Tan, Non-homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-32						
57-13-11-32	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown and Tan, Non-homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-33						
57-13-11-33	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown and Tan, Non-homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-34						
57-13-12-34	Mastic, Tan, Non-homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%
PLM16-528-35						
57-13-12-35	Mastic, Tan, Non-homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%
PLM16-528-36						
57-13-12-36	Mastic, Tan, Non-homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%
PLM16-528-37						
57-13-13-37	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-38						
57-13-13-38	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-39						
57-13-13-39	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-40						
57-13-14-40	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-41						
57-13-14-41	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-42						
57-13-14-42	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-43						
57-13-15-43	LAYER 1 Cove Base, Tan, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%
PLM16-528-44						
57-13-15-44	LAYER 1 Cove Base, Tan, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%
PLM16-528-45						
57-13-15-45	LAYER 1 Cove Base, Tan, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%
PLM16-528-46						
57-13-16-46	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-47						
57-13-16-47	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%
PLM16-528-48						
57-13-16-48	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Brown, Homogeneous, Rubbery	LAYER 2 10%	None Detected		Binder/Filler	100%
PLM16-528-49						
57-12-17-49	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-528-50						
57-12-17-50	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-528-51						
57-12-17-51	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-528-52						
57-12-18-52	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-528-53						
57-12-18-53	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-528-54						
57-12-18-54	Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-55						
57-12-19-55	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-56						
57-12-19-56	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-57						
57-12-19-57	LAYER 1 Cove Base, Brown, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-58						
57-7-20-58	LAYER 1 Cove Base, Green, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-59						
57-7-20-59	LAYER 1 Cove Base, Green, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-60						
57-7-20-60	LAYER 1 Cove Base, Green, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-61						
57-7-21-61	LAYER 1 Cove Base, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-62						
57-7-21-62	LAYER 1 Cove Base, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-63						
57-7-21-63	LAYER 1 Cove Base, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Brown, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-528-64						
57-5-22-64	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-528-65						
57-5-22-65	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-528

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-528-66						
57-5-22-66	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-528-67						
57-5-23-67	Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-68						
57-5-23-68	Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-69						
57-5-23-69	Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-528-70						
57-4-24-70	Formica, White and Brown, Homogeneous, Hard	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	35% 65%
PLM16-528-71						
57-4-24-71	Formica, White and Brown, Homogeneous, Hard	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	35% 65%
PLM16-528-72						
57-4-24-72	Formica, White and Brown, Homogeneous, Hard	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	35% 65%

ADDITIONAL COMMENTS: All separable parts or layers (except paint) within the same sample are analyzed and reported individually. Composite asbestos percent is reported, if applicable, by visual estimation.

ND = None Detected TR = Trace, less than 1.0%

Analyst: JA Urdiales for Katie Shaw
Katie Shaw

Date: 11/26/2016

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-528

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/17/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1957-Center Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-528-01	57-14-1-1	Tan 9x9 FT-black mastic	PLM	
02	57-14-1-2	Tan 9x9 FT-black mastic	PLM	
03	57-14-1-3	Tan 9x9 FT-black mastic	PLM	
04	57-14-2-4	White floor leveler	PLM	
05	57-14-2-5	White floor leveler	PLM	
06	57-14-2-6	White floor leveler	PLM	
07	57-14-3-7	White 12x12 pencil hole CT-brown glue dot	PLM	
08	57-14-3-8	White 12x12 pencil hole CT-brown glue dot	PLM	
09	57-14-3-9	White 12x12 pencil hole CT-brown glue dot	PLM	
10	57-14-4-10	White 2x2 Pinhole/fissure/potmark CT	PLM	
11	57-14-4-11	White 2x2 Pinhole/fissure/potmark CT	PLM	
12	57-14-4-12	White 2x2 Pinhole/fissure/potmark CT	PLM	
13	57-14-5-13	Brown 2" cove base-brown mastic	PLM	
14	57-14-5-14	Brown 2" cove base-brown mastic	PLM	
15	57-14-5-15	Brown 2" cove base-brown mastic	PLM	
16	57-14-6-16	Brown wood pattern 12x12 FT-clear mastic	PLM	
17	57-14-6-17	Brown wood pattern 12x12 FT-clear mastic	PLM	
18	57-14-6-18	Brown wood pattern 12x12 FT-clear mastic	PLM	
19	57-14-7-19	Yellow/black carpet mastic	PLM	
20	57-14-7-20	Yellow/black carpet mastic	PLM	

1-20 of 72

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/18/2016
Received by: M Underdale Date/Time: 11/21/16 9:30 am
Relinquished by: _____ Date/Time: _____
Received by: _____ Date/Time: _____

PLM16-528

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/17/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1957-Center Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-528-21	57-14-7-21	Yellow/black carpet mastic	PLM	
22	57-14-8-22	Tan painted DWJC	PLM	
23	57-14-8-23	Tan painted DWJC	PLM	
24	57-14-8-24	Tan painted DWJC	PLM	
25	57-14-9-25	Blue painted column wall plaster	PLM	
26	57-14-9-26	Blue painted column wall plaster	PLM	
27	57-14-9-27	Blue painted column wall plaster	PLM	
28	57-13-10-28	White w/blk-red streak 12x12 FT-blk mast.	PLM	
29	57-13-10-29	White w/blk-red streak 12x12 FT-blk mast.	PLM	
30	57-13-10-30	White w/blk-red streak 12x12 FT-blk mast.	PLM	
31	57-13-11-31	Brown 4" cove base-brown mastic	PLM	
32	57-13-11-32	Brown 4" cove base-brown mastic	PLM	
33	57-13-11-33	Brown 4" cove base-brown mastic	PLM	
34	57-13-12-34	Yellow wall mastic	PLM	
35	57-13-12-35	Yellow wall mastic	PLM	
36	57-13-12-36	Yellow wall mastic	PLM	
37	57-13-13-37	White wall texture	PLM	
38	57-13-13-38	White wall texture	PLM	
39	57-13-13-39	White wall texture	PLM	
40	57-13-14-40	White wall texture	PLM	

21-40 of 72

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/18/2016

Received by: M Underdale Date/Time: 11/21/16 9:30am

Relinquished by: _____ Date/Time: _____

Received by: _____ Date/Time: _____

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-528

River North Environmental Testing, Inc.
3650 Chestnut Place • Denver, CO 80216
Ph: 303-297-0079 • Fax: 303-292-1451
www.rnetesting.com • info@rnetesting.com

Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/17/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1957-Center Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-528-41	57-13-14-41	White wall texture	PLM	
42	57-13-14-42	White wall texture	PLM	
43	57-13-15-43	Tan cove base-yelow mastic	PLM	
44	57-13-15-44	Tan cove base-yelow mastic	PLM	
45	57-13-15-45	Tan cove base-yelow mastic	PLM	
46	57-13-16-46	Dark gray 4" cove base-yellow/brown mast.	PLM	
47	57-13-16-47	Dark gray 4" cove base-yellow/brown mast.	PLM	
48	57-13-16-48	Dark gray 4" cove base-yellow/brown mast.	PLM	
49	57-12-17-49	White wall texture	PLM	
50	57-12-17-50	White wall texture	PLM	
51	57-12-17-51	White wall texture	PLM	
52	57-12-18-52	White ceiling texture	PLM	
53	57-12-18-53	White ceiling texture	PLM	
54	57-12-18-54	White ceiling texture	PLM	
55	57-12-19-55	Brown 4" cove base-brown mastic	PLM	
56	57-12-19-56	Brown 4" cove base-brown mastic	PLM	
57	57-12-19-57	Brown 4" cove base-brown mastic	PLM	
58	57-7-20-58	Green 4" cove base-yelow/brown mastic	PLM	
59	57-7-20-59	Green 4" cove base-yelow/brown mastic	PLM	
60	57-7-20-60	Green 4" cove base-yelow/brown mastic	PLM	

Total Number of Samples: 20 41-60 of 72

Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/18/2016

Received by: [signature] Date/Time: 11/21/16 9:30am

Relinquished by: Date/Time:

Received by: Date/Time:

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-528

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
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Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/17/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1957-Center Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-528-61	57-7-21-61	White 4" cove base-yellow mastic	PLM	
62	57-7-21-62	White 4" cove base-yellow mastic	PLM	
63	57-7-21-63	White 4" cove base-yellow mastic	PLM	
64	57-5-22-64	White 2'x4' pinhole/potmark CT	PLM	
65	57-5-22-65	White 2'x4' pinhole/potmark CT	PLM	
66	57-5-22-66	White 2'x4' pinhole/potmark CT	PLM	
67	57-5-23-67	Window glazing	PLM	
68	57-5-23-68	Window glazing	PLM	
69	57-5-23-69	Window glazing	PLM	
70	57-4-24-70	White 2'x2' computer floor laminate	PLM	
71	57-4-24-71	White 2'x2' computer floor laminate	PLM	
72	57-4-24-72	White 2'x2' computer floor laminate	PLM	

Total Number of Samples: 12 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/18/2016
Received by: M Underdue Date/Time: 11/21/16 9:30 am
Relinquished by: _____ Date/Time: _____
Received by: _____ Date/Time: _____

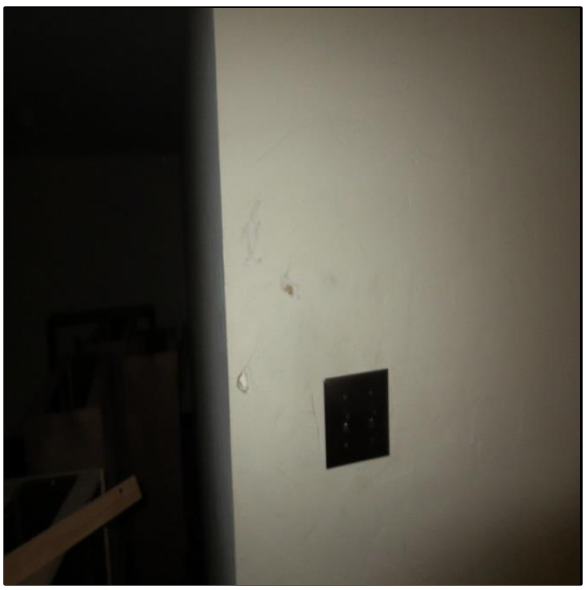
APPENDIX E

POSITIVE ACM PHOTOGRAPHIC DOCUMENTATION

Positive ACM– Center Building-1957, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	1	**Date:**	11/17/2016
Description:	Asbestos-containing tan 9”x9” floor tile with black mastic on the 14th floor. Samples 1, 2, 3.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	2	**Date:**	11/17/2016
Description:	Asbestos-containing white 12”x12” floor tile with black mastic on the 13th floor. Samples 28, 29, 30.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		



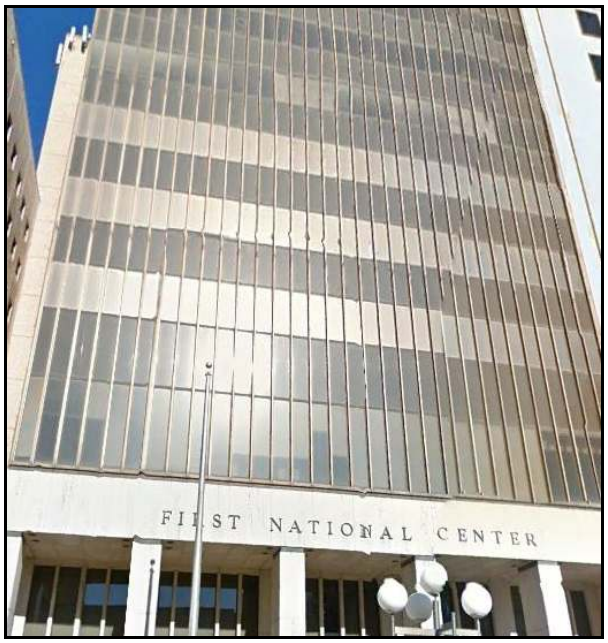
Photograph Number:	3	**Date:**	11/17/2016
Description:	Asbestos-containing white wall texture on the 12th floor. Samples 49, 50, 51.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	4	**Date:**	11/17/2016
Description:	Asbestos-containing white ceiling texture on the 12th floor. Samples 52, 53, 54.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Asbestos Survey Verification

First National Center
East Building-1972

120 North Robinson Street
Oklahoma City, Oklahoma 73102



Prepared For:

The City of Oklahoma City

420 W Main Street, Suite 920
Oklahoma City, OK 73102

Date Prepared:
January 16, 2017

Prepared By:

Family Environmental

SCS ENGINEERS

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FIGURES

APPENDICES

1.0 INTRODUCTION

SCS Engineers (SCS) was contracted by the City of Oklahoma City, Oklahoma Planning Department to perform an asbestos survey within the First National Center (FNC), 120 North Robinson Avenue, Oklahoma City, Oklahoma (Property). The entire Property consists of three independently built structures: the West Building constructed in 1931, the Center Building constructed in 1957 and the East Building constructed in 1972. The extent of this asbestos survey verification is limited to the East Building.

The FNC East Building is planned for parking redevelopment. The redevelopment is expected to include demolition and renovation activities. As a part of cleanup planning activities prior to redevelopment, the SCS project team completed an Asbestos Survey Verification of previously completed asbestos surveys. Terracon Consultants, Inc. (Terracon) completed asbestos surveys in May 2014 and June 2016. The overall purpose of the asbestos survey verification was to review previously completed asbestos survey data; identify data gaps in the previously prepared asbestos survey reports; and resolve any identified data gaps via bulk sampling of additional building materials and laboratory analysis prior to the anticipated FNC East Building demolition/renovation; and confirm areas within the East Building that have been previously abated which will not require asbestos abatement prior to the planned building demolition/renovation activities. The survey verification design team consisted of SCS and Family Environmental Compliance Services, Inc. (Family Environmental). The FNC East Building survey verification activities were conducted on November 14 through November 16, 2016 and November 29, 2016. The findings of this survey did confirm and identify additional building materials containing asbestos at the FNC East Building.

2.0 PREVIOUS ASBESTOS SURVEYS

2.1 Terracon Asbestos Surveys

Two asbestos surveys were completed for the East Building at the FNC Property for prior prospective purchasers. These asbestos surveys were completed by Terracon in May 2014 and June 2016 for all three FNC Property buildings. The May 2014 survey, for the East Building, identified the types of asbestos-containing material (ACM) present in the East Building, but did not include building plans, sampling location drawings or photographs of confirmed ACM in the survey report. Table 1 below presents the ACM identified in the May 2014 survey report. The June 2016 survey, of all three buildings, provided additional information on estimated quantities of ACM, general locations of identified ACM, incorporated results and data from the 2014 survey and provided a revised abatement cost estimate. The 2016 Survey document also did not provide building plans, sampling location drawings or photographs of confirmed ACM. Copies of the previous Terracon asbestos surveys are available upon request. However, due to the size of the overall Terracon survey documents, copies were not appended to this report for review.

TABLE 1 – IDENTIFIED ASBESTOS-CONTAINING MATERIALS

Material Description	Material Location
Floor Tile and Mastic	Throughout
Sheet Vinyl Beneath Floor Tile	9th Floor
Piping / Fittings (steam, Domestic Water, Drain and Chilled Water)	Throughout
Transite ®	Window Panels and Stored Panels
Joint Compound	Basement, 2nd – 15th Floor Original Walls
2' X 2' Ceiling Tile	Basement, 9-11th Floors
Fire Door	Stairway Doors
Paper Gaskets	14th Floor Boiler
Spray Applied Fire Proofing	3rd – 7th, 12th - 14th Floor Perimeter Columns, Sub-basement, Basement-East, 8th-11th Floors Throughout, 14th Floor Boiler Room, & 15th Floor Mechanical Room, Three East Elevator Shafts And Two Freight Elevator Shafts
Caulking	Windows Throughout-Assumed
Roofing Materials	Roof-Assumed

3.0 PREVIOUS ASBESTOS SURVEYS DATA GAPS

3.1 Identified Data Gaps

Following our review of the May 2014 and June 2016 Terracon asbestos survey reports, the survey design team identified the following data gaps:

- No sample location drawings;
- No photographic documentation of positively identified ACM;
- Missing or assumed building materials not sampled; and
- Previously abated areas included in area quantities still requiring abatement.

3.2 Resolution of Identified Data Gaps

To resolve the identified data gaps listed above, the survey design team completed the following activities:

- Generate and provide sample location drawings for all additional building materials tested, see Figures – Asbestos Sample Location Maps;
- Collect and generate photographic documentation of newly identified ACM, see **Appendix E**;
- Compile a list of assumed or missing building materials to be sampled and analyzed for asbestos content; and
- Eliminate areas of the building requiring asbestos abatement following an interview with FNC maintenance supervisor, Mr. Brian Taulbee.

4.0 VERIFICATION ASBESTOS SURVEY

4.1 Regulatory Overview

This ACM Verification survey was conducted in accordance United States Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA), 40 Code of Federal Regulations (CFR) Part 763; National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61; Occupational Safety and Health Administration (OSHA) Asbestos Standard for the Construction Industry 29 CFR 1910.1101; and OSHA Toxic and Hazardous Substances, Subpart Z – Asbestos 29 CFR 1910.1001. The ACM survey was completed by Mr. Michael Dustman with Family Environmental and Mr. Bryan Ross with SCS Engineers. Both Mr. Dustman and Mr. Ross are EPA AHERA accredited and State of Oklahoma-certified Asbestos Building Inspectors. A copy of Mr. Dustman's and Mr. Ross's asbestos inspector licenses is presented in **Appendix A**.

NESHAP 40 CFR Part 61 regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, ACMs are classified as either Friable, Category I Non-Friable or Category II Non-Friable. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I Non-Friable ACM includes packings, gaskets, resilient floor coverings and asphaltic roofing products. Category II Non-Friable ACM are any materials other than Category I materials that contain greater than one percent asbestos.

Friable ACM, Category I Non-Friable ACM and Category II Non-Friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities is considered regulated asbestos-containing material (RACM). RACM must be removed prior to renovation or demolition activities regardless of the amount of asbestos materials present.

OSHA 29 CFR 1910.1101 regulates workplace exposure to asbestos. The OSHA Permissible Exposure Limit (PEL) requires that long-term employee exposure to airborne asbestos fibers be maintained below 0.1 fibers per cubic centimeter (f/cc) of air averaged over an eight-hour time period. The OSHA Excursion Limit (EL) requires that short-term employee exposure to airborne asbestos fibers must be below 1.0 f/cc averaged over a 30 minute time period. The OSHA standard classifies construction and maintenance activities which could disturb ACM, and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

4.2 Property Description

The FNC East Building structure was constructed in 1972 and consists of approximately 285,000 square feet. This structure is a 15-story curtain wall and brick building with a partial basement and sub-basement. The SCS survey design team was provided generic floor plans for this survey for review and markup; see **Asbestos Sample Location Maps,** following this survey report.

4.3 Homogeneous Materials Assessment

The SCS survey team building inspectors developed an individual homogeneous material sampling list which identifies individual building materials present at the Property, see **Appendix B**. A homogeneous material area consists of building materials which appear similar throughout in terms of color, texture, and date of construction application. A homogeneous material sampling list is utilized during a survey to ensure all identified suspect building materials are sampled. The homogeneous materials list is comprised of friable surfacing materials, friable thermal systems insulation, and miscellaneous materials. Random suspect ACM samples are collected across each individual homogeneous material or in this case, specific materials that will be disturbed during microbial remediation activities. Once the homogeneous material sampling list was complete, a sample number scheme was developed which incorporated acronym descriptions of the building material to be sampled and a numerical value to track each homogeneous material.

4.4 Sample Number Assignment Methodology

The SCS survey team building inspector utilized a methodical site specific sampling identification (ID) number for all building material samples collected during the Property survey. An example of the Property specific sampling ID number is listed below:

72^{A}-1^{B}-1^{C}-1^{D}

A. Building construction date identifier;
B. Floor where the building material was sampled;
C. Building material homogeneous material number;
D. Assigned sequential value identifying the total number of samples collected.

4.5 Friability Assessment

An assessment of each homogeneous building material was conducted of suspect ACM to assess the general condition and friability of each building material. The EPA defines a friable material as one which, when dry, can be crumbled, pulverized or reduced to powder by hand pressure.

Non-friable materials do not meet this criterion. Friability was assessed by the building inspector by physically touching all building materials prior to sampling.

4.6 Bulk Sample Collection

ACMs include nearly all building materials except glass, metal, and wood. An appropriately attired building inspector collected suspected ACM samples using wet methods, as applicable to reduce the potential for fiber release. Collected samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker. The building inspectors identified a total of **89** different homogeneous building materials to be sampled and collected a total of **262** bulk samples across the identified homogeneous building materials at the Property. Friable and non-friable samples were collected during survey activities. A sample summary sheet of all samples collected during this ACM survey is presented in **Appendix C** which, details which building materials containing asbestos and the associated asbestos percentage.

4.7 Laboratory Information

Building material samples were submitted under proper chain-of-custody procedures to River North Environmental Testing, Inc. (RNET) of Denver, Colorado, for analysis by polarized light microscopy (PLM) with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). Microscopical visual estimation was used in obtaining the percentage of asbestos in the bulk samples. RNET is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), code 200448-0. **Appendix D** contains these analytical results.

4.8 NEWLY IDENTIFIED OR CONFIRMED ACM

As discussed in Section 3.2, Resolution of Identified Data Gaps, additional bulk sampling or confirmation bulk sampling was conducted to fully identify ACM located in the FNC East Building. Table 2 below, lists newly identified or confirmed ACMs located in the FNC East Building. The information listed in Table 1 and Table 2 should be utilized to develop an appropriate asbestos abatement design prior to building demolition/renovation activities. Photographic documentation of positive ACM identified during this verification survey is located in **Appendix E**.

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM

Material Description	Area	Floor	Location
Joint Compound on Ceiling drywall	Ceiling	Elevator Penthouse	East
Ceiling joint compound	Ceiling	Elevator Penthouse	East

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM			
Material Description	**Area**	**Floor**	**Location**
Joint Compound on Ceiling drywall	Ceiling	Elevator Penthouse	East
Ceiling joint compound	Ceiling	Elevator Penthouse	East
White surfacing material on drywall	Air Duct	14	Exterior Shaft-West wall
Tan w/gray streaks 9x9 FT-black mastic	NW Office	11	Floor
Black Glue Dot	NW Office	11	Under 12”x12” Ceiling Tile
Black Mastic under Gray Floor Filler	Floor	11	Over south walker duct
Brown Glue	South Wall	11	Behind wood paneling
Black Mastic under Gray Floor Leveler	Floor	7	Under carpet throughout
White Wall Texture	Feed the Children	1	NE wall
Black Glue	Downtowner	Basement	Restaurant walls behind wood panels
Brown Glue	Downtowner	Basement	Restaurant walls behind wood panels
Black Mastic	Downtowner	Basement	Restaurant floor
Black Mastic	N. Open Area	Basement	Floor
Black Mastic	Center RM	Basement	Floor
Black Mastic	Server Room	Basement	Floor
Black Mastic	West Vestibule	Basement	Floor
White Wall Texture	Escalator	Basement	Wall
White Ceiling Texture	Escalator	Basement	Ceiling
Gray/ White Streaks 12”x12” Floor Tile with Black Mastic	Vault	Sub-Basement	All floors throughout sub-basement
Vermiculite Wall Insulation	Fire Pump Room	Sub-Basement	Inside drywall walls
Black Mastic	East Area	Sub-Basement	Eastern -most area, behind mirror panel
Fireproofing Overspray above Hall Ceiling	Hall Ceiling	1	Above white 2'x2' ceiling tile in hallway on HVAC duct

4.9 Presumed ACM

An attempt was made to survey all areas of the FNC East Building and collect bulk samples of building materials suspected of containing asbestos. However, building materials located within wall cavities, void spaces or otherwise concealed and inaccessible to the building inspectors at the time of sampling are considered asbestos-containing until tested and proven otherwise. Observed building materials not sampled and assumed to contain asbestos include: **all pipe gaskets, various thermal systems insulation (TSI), any/all cloth wire insulation, roofing, and all elevator components.**

5.0 CONFIRMATION OF PREVIOUSLY ABATED AREAS

During on-site survey activities at the FNC East Building and following an interview conducted with Mr. Brian Taulbee, FNC maintenance supervisor, it was discovered that areas of the East Building have undergone previous partial asbestos abatement activity. According to Mr. Taulbee, not all identified ACM were removed from every floor due to ease of access and/or project limitations. Areas that have received asbestos abatement are listed in Table 3-Previously Abated Areas, below.

TABLE 4 – PREVIOUSLY ABATED AREAS

Floor(s)	Remaining ACM	Location(s)
13 & 12	Fireproofing/Overspray	Main ceiling area with the exception of perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts
8-1	Fireproofing/Overspray	Main ceiling area with the exception of perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts

6.0 REMAINING ASBESTOS ABATEMENT MATERIALS

Floors and areas within the East Building along with their associated designated ACM still requiring asbestos abatement are listed in Table 4-Remaining Asbestos Abatement Areas, below. The ACM materials listed in Table 4 are those materials identified in the Terracon survey reports and newly identified/confirmed materials discovered during this verification asbestos survey which will require proper asbestos abatement.

TABLE 4 – REMAINING ASBESTOS ABATEMENT AREAS

Floor(s)	Remaining ACM	Location(s)
15	Fireproofing/Overspray	Throughout
	Joint Compound	Throughout original tan drywall walls
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
14	Fireproofing/Overspray	Throughout walls, ceilings, columns and in Boiler Room.
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	TSI – Fittings/Piping	Throughout
	White Surfacing Material	Core air shaft
	Paper Gaskets	Boiler Room
	Fire Doors	Stairwells
13 & 12	Fireproofing/Overspray	Fireproofing and Overspray – Perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
11, 10 & 9	Fireproofing/Overspray	Throughout entire walls, ceilings and columns
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows
	Black Mastic – 11th Floor only	Various areas throughout floor
	TSI – Fittings/Piping	Fittings throughout
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout
11	Tan 9"x9" Floor Tile/Black Mastic	Floor
	Black glue dot	Ceiling under 12"x12" Ceiling Tile
	Brown glue	Behind wood paneling
8-1	Fireproofing/Overspray	Fireproofing and Overspray – Perimeter walls and columns, behind east and west stairwell ceiling drywall, SW Freight Elev. Shaft, East Elev. Shaft, East and West Core Air Shafts
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Transite Paneling	East wall, above and below windows

TABLE 4 – REMAINING ASBESTOS ABATEMENT AREAS		
Floor(s)	**Remaining ACM**	**Location(s)**
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
9	Sheet Vinyl Beneath Floor Tile	West side by former kitchen
7	Black Mastic	Under gray floor filler
1	Surfacing Texture on Drywall	Feed the Children-NE Wall
Basement	Fireproofing/Overspray	Throughout entire walls and ceilings
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	Black Mastic	Throughout under all floor tile
	TSI – Fittings/Piping	Throughout
	Black Glue	Downtowner-Behind Wood Paneling
	Brown Glue	Downtowner-Behind Wood Paneling
	White Wall Texture	Escalator Area
	White Ceiling Texture	Escalator Area
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout
Sub-Basement	Vermiculite Wall Insulation	Fire Sprinkler Pump Room-Inside Drywall Wall Cavities
	Black Glue	Behind Mirrors in Cafeteria
	Gray with White Streaks 12"x12" Floor Tile and Black Mastic	Vault Floor
	Fireproofing/Overspray	Throughout entire walls and ceilings
	Joint Compound	Throughout original tan drywall walls
	ACM debris inside floor Walker Duct	Throughout East and West walker ducts
	TSI – Fittings/Piping	Throughout
	Fire Doors	Stairwells
	2'x2' Ceiling Tile	Throughout

7.0 FINDINGS & CONCLUSIONS

7.1 Survey Findings

The findings of this asbestos verification survey, compiled by the SCS survey design team, identified data gaps and misrepresented abatement quantities within the previously prepared asbestos surveys. The identified data gaps were resolved through a comprehensive building walk-through, additional on-site material bulk sampling, photograph collection, sample location drawing generation and on-site interviews with FNC maintenance personnel. Following the collection of additional material samples, this survey identified or confirmed ACM within existing building materials, not listed in the previous surveys. The FNC maintenance personnel interviews were conducted to better understand areas within the East Building that were previously abated. With the knowledge of misrepresented abatement quantities and previous abatement information provided by FNC personnel, the survey design team was able to eliminate asbestos abatement areas within the FNC East Building which were included within other previously prepared survey and abatement estimate information.

7.2 Survey Conclusions

Based on the findings of this verification survey, it is our professional opinion, that prior to building demolition/renovation activities, a lesser level of effort necessary to complete proper asbestos abatement should be anticipated than the estimates stated in the previously prepared asbestos surveys.

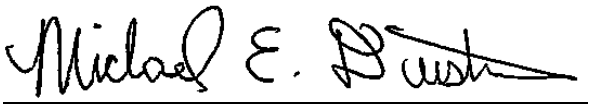
8.0 RECOMMENDATIONS

The SCS project team recommends a State of Oklahoma-licensed and qualified asbestos abatement contractor conduct proper abatement of the Property structure prior to any building demolition/renovation activities. Additionally, we recommend an asbestos abatement project design be prepared by a State of Oklahoma-licensed project designer prior to conducting any abatement activity. The Oklahoma Department of Labor (ODOL) must approve all asbestos abatement designs prior to commencement of abatement activity.

9.0 LIMITATIONS

This asbestos verification survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. All results, findings, conclusions and recommendations expressed in this report are based on conditions observed during our survey of the Property. The information contained in this report is relevant to the date on which this survey was performed, and should not be relied upon to represent conditions at a later date. This report has been prepared on behalf of and exclusively for use by the Client for specific application to their project as discussed. This report is not a bidding document. All contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. SCS and Family Environmental does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied is made.

This asbestos verification survey report was prepared by:



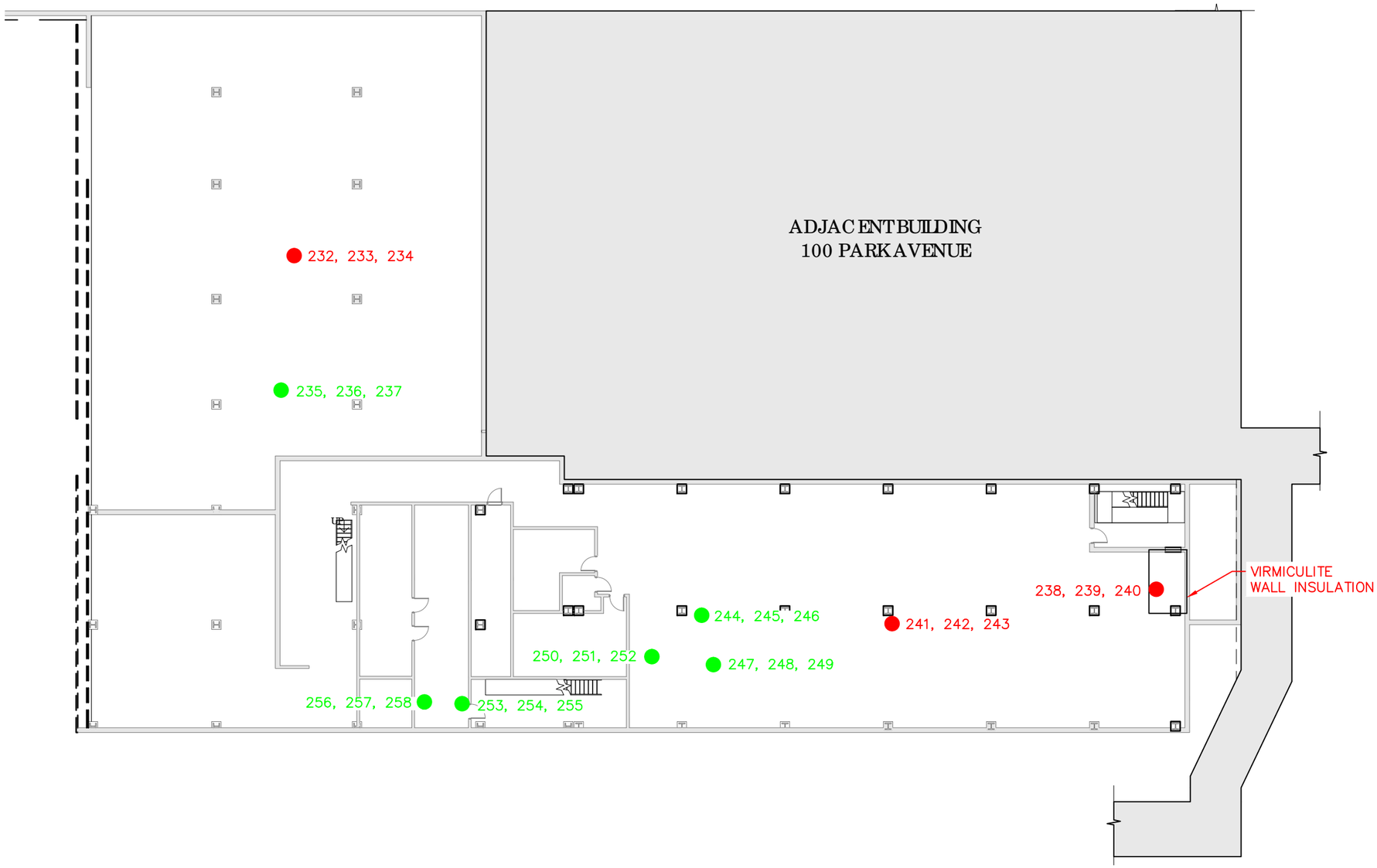
Date: January 16, 2017

Michael E. Dustman

Family Environmental Compliance Services, Inc.
600 East 8th Street, Suite B
Kansas City, Missouri 64106
Phone: (816) 527-0101

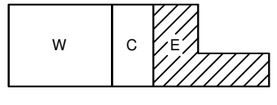
FIGURES

ASBESTOS SAMPLE LOCATION MAPS



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

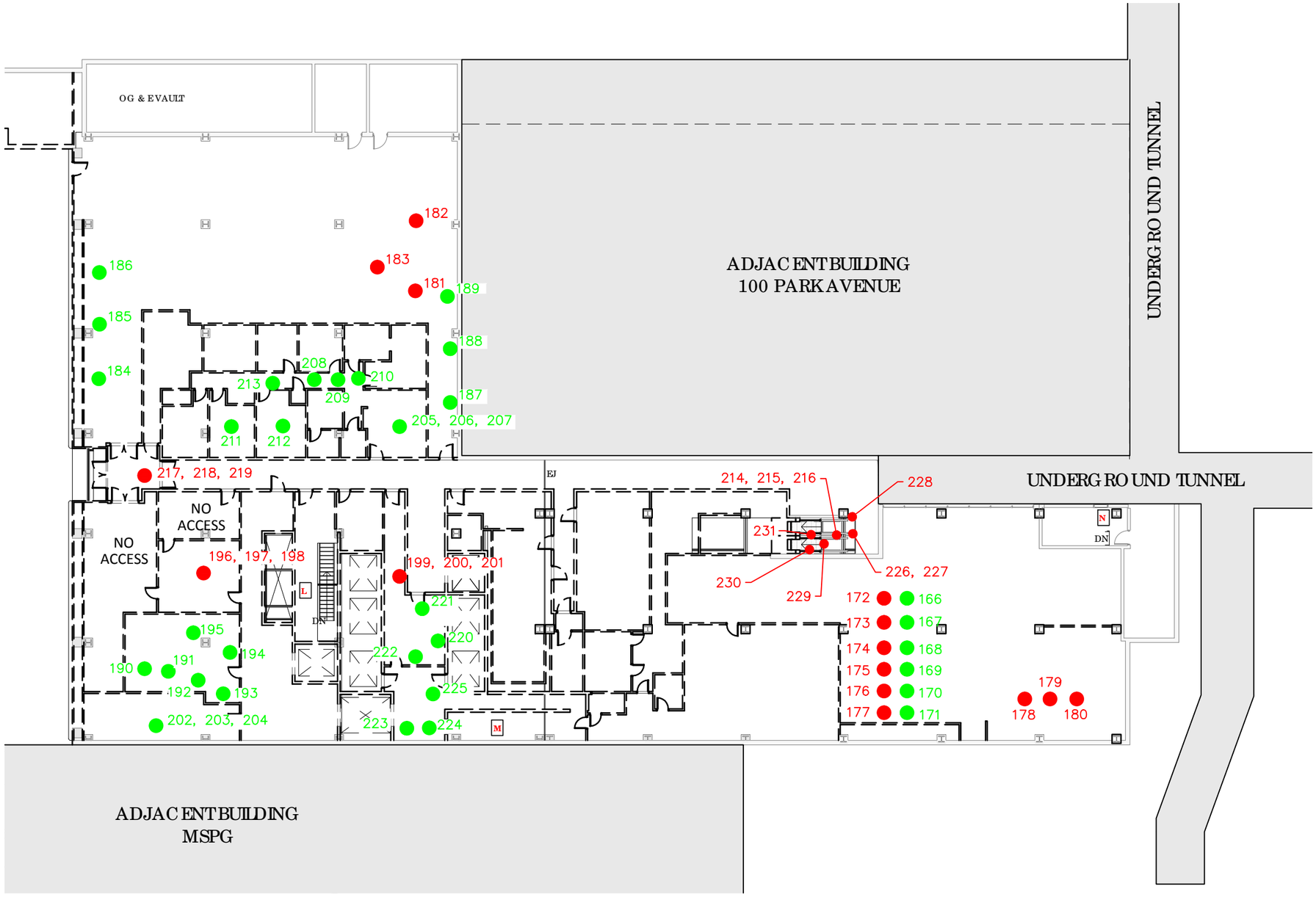
SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT
CONSULTING ENGINEERS, INC.
7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
PH. (913) 681-0030 FAX NO. (913) 681-0012

PROJ. NO.	CADD FILE:	DATE:	SCALE:
27216366.00	--	--	--

SUB-BASEMENT
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

N:\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216366.00-FNC-East Sample Locations Maps.dwg



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**

W C E

N

NOT TO SCALE

SCS ENGINEERS
STEARNS, CONRAD AND SCHMIDT CONSULTING ENGINEERS, INC.
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PH. (913) 681-0030 FAX NO. (913) 681-0012

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BASEMENT
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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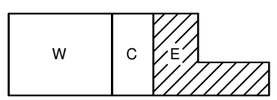
LEGEND

- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION



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FIRST FLOOR
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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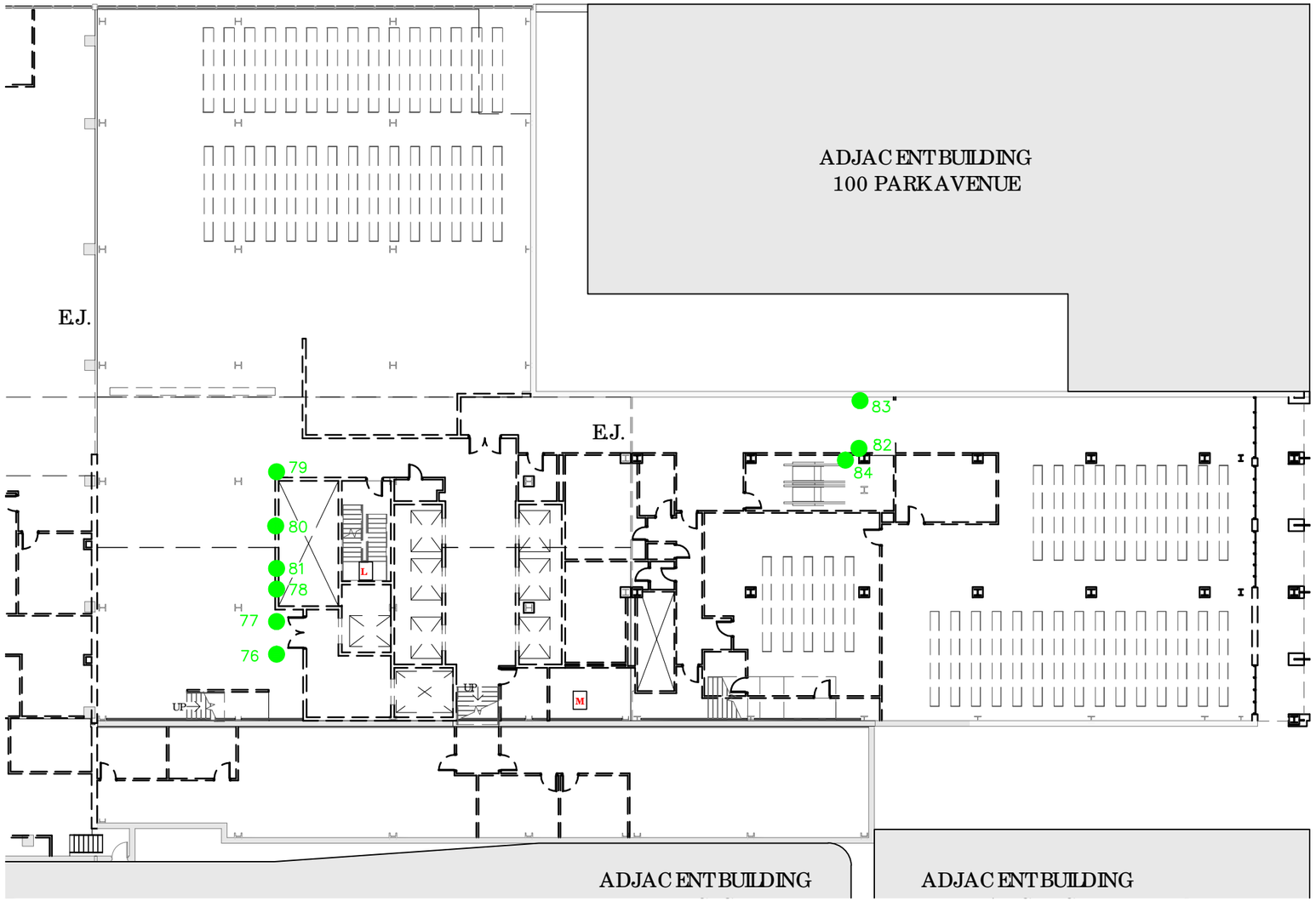

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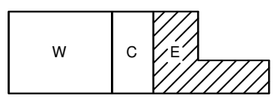
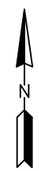
- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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SECOND FLOOR ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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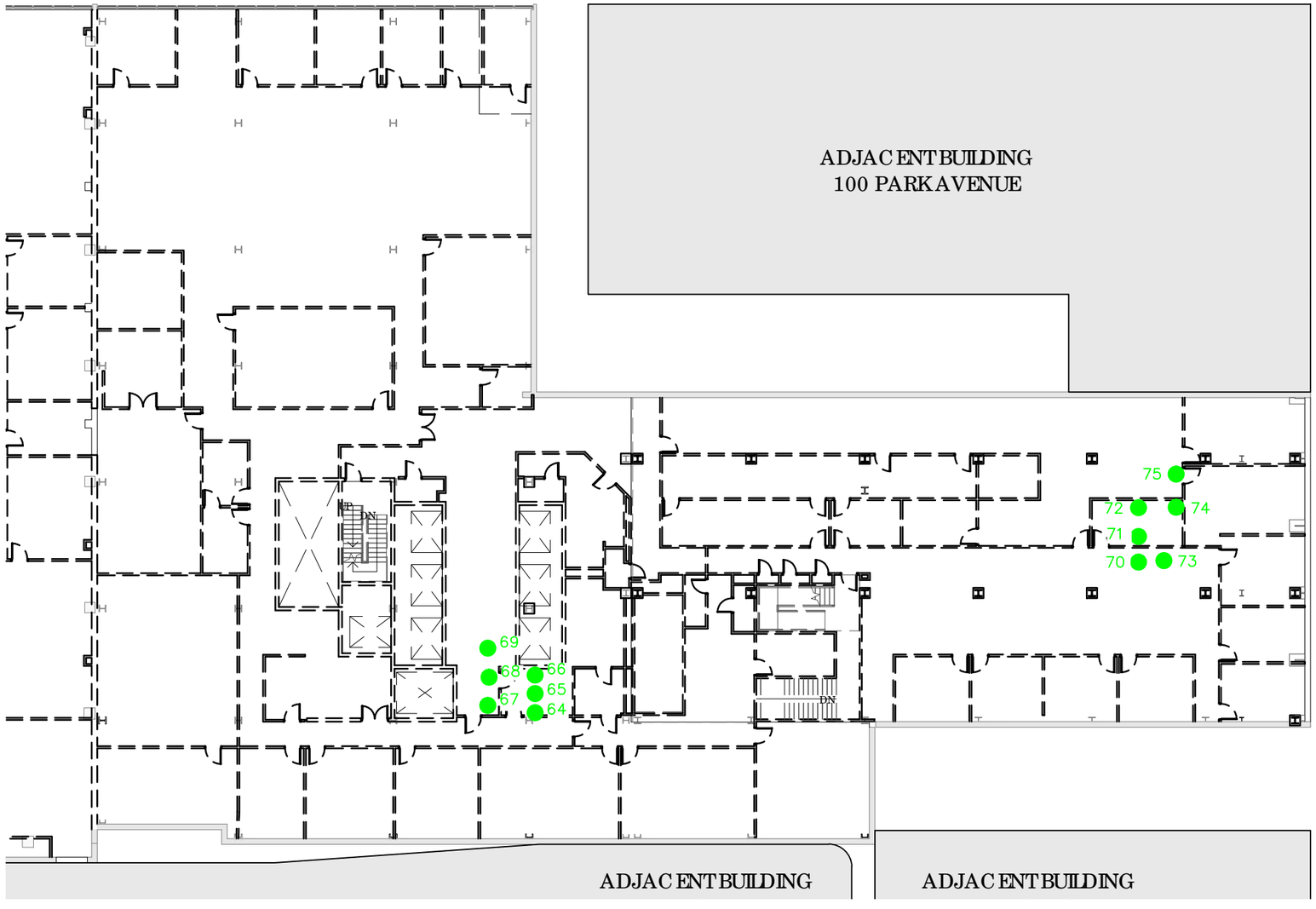
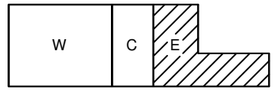


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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THIRD FLOOR
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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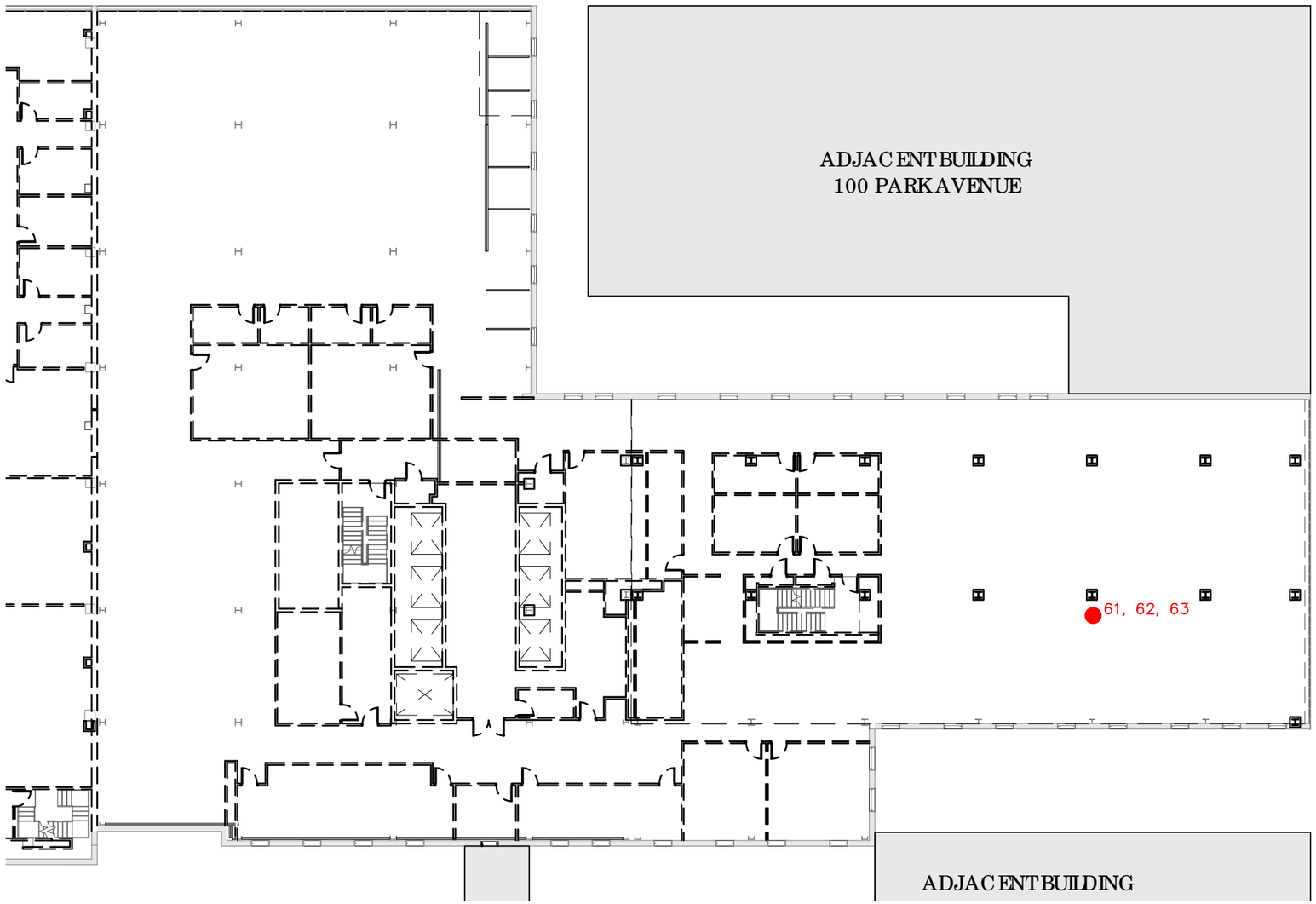
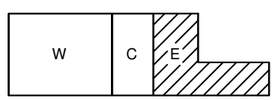


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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SEVENTH FLOOR ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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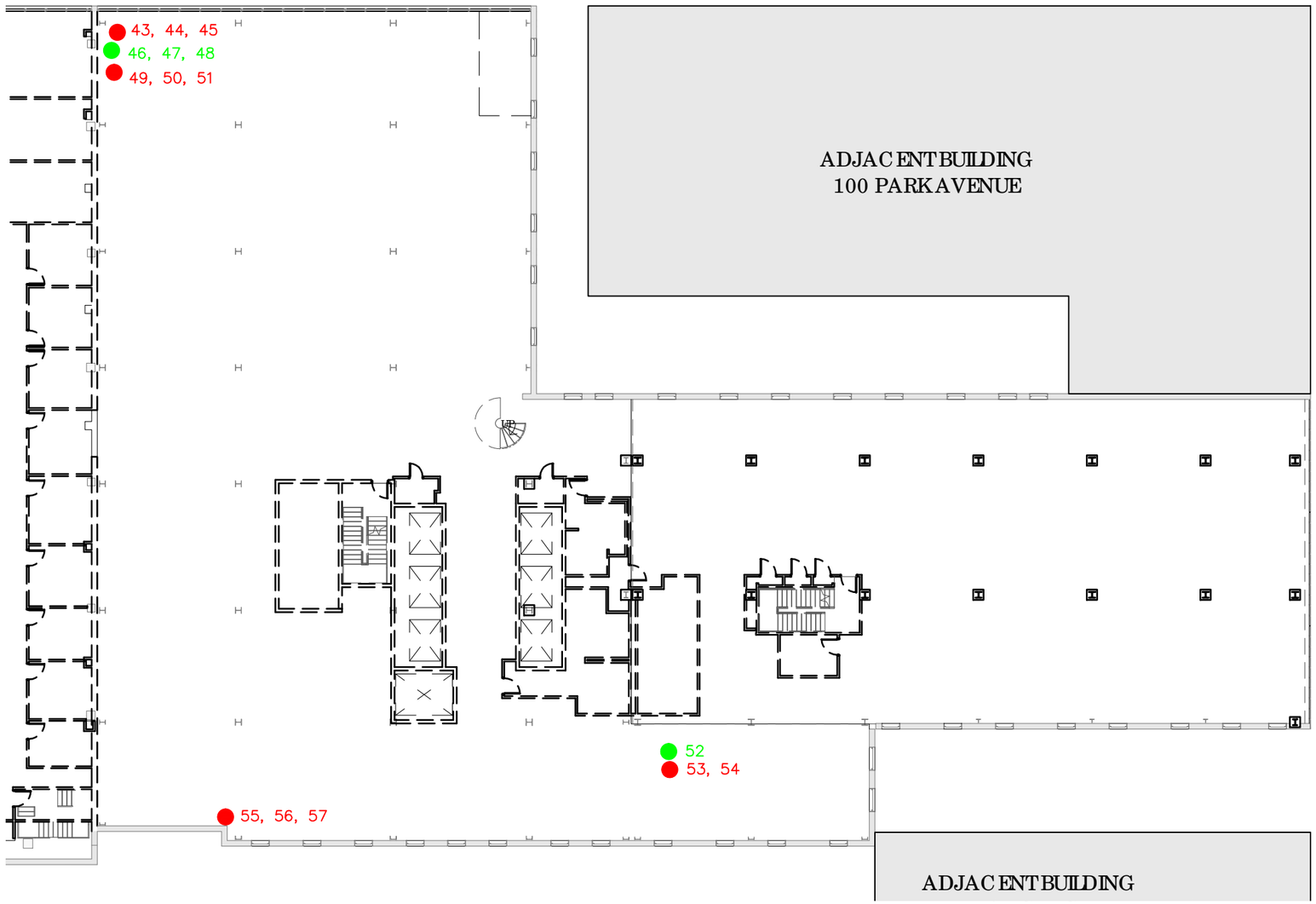
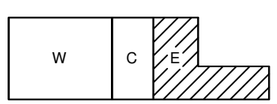


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

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7311 W 130th St., SUITE 100, OVERLAND PARK, KS 66213
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ELEVENTH FLOOR
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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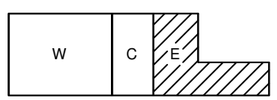
LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

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FOURTEENTH FLOOR
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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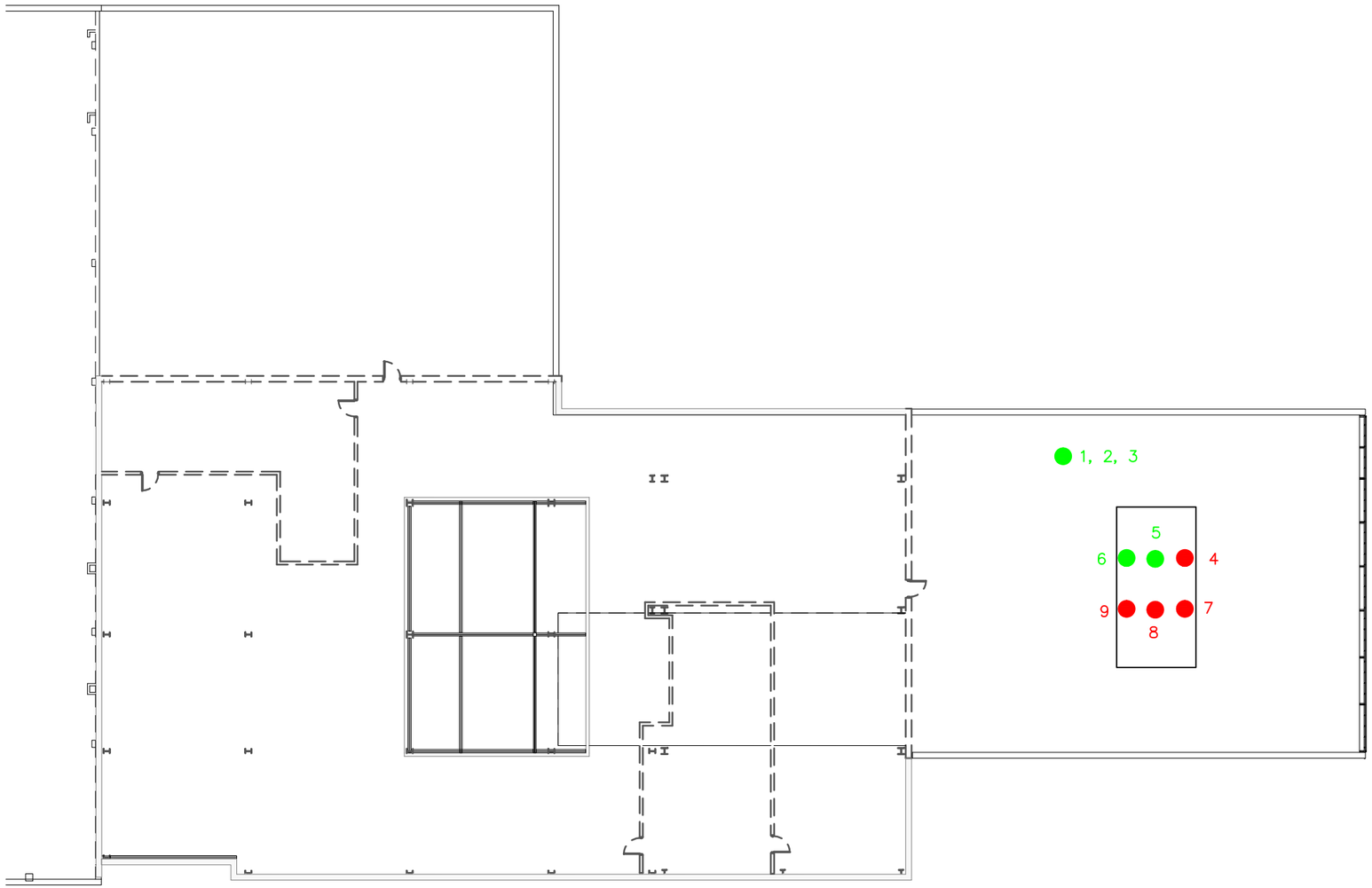
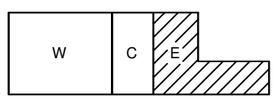
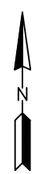


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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FIFTEENTH FLOOR
ACM SAMPLE LOCATION MAP

EAST BUILDING (1972)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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APPENDIX A

ASBESTOS INSPECTOR'S LICENSES

Oklahoma Department of Labor

Asbestos License

This certifies that **Michael Dustman**
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:

Project Designer

Melissa M. Houston,
Labor Commissioner

License # : 401745
Expires : 02/10/2017
Issued : 11/17/2016

Not intended for identification purposes

Oklahoma Department of Labor

Asbestos License

This certifies that **Michael Dustman**
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:

Inspector

Melissa M. Houston,
Labor Commissioner

License # : 400894
Expires : 02/11/2017
Issued : 11/14/2016

Not intended for identification purposes

Oklahoma Department of Labor
Asbestos License

This certifies that **Bryan Ross**
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:

Inspector

Melissa M. Houston,
Labor Commissioner

License # :400692
Expires :11/01/2017
Issued :11/14/2016

Not intended for identification purposes

APPENDIX B

HOMOGENEOUS AREAS TABLE

HOMOGENEOUS MATERIALS LIST
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

No.	Material Description
1	Off white vibration joint cloth
2	Ceiling drywall
3	Ceiling joint compound
4	White surfacing material on drywall
5	White surfacing material on drywall
6	White 2'x4' pinhole and small fissure CT
7	Gray 4" cove base with yellow mastic
8	Green carpet mastic
9	Gray w/gray streaks 12x12 FT-yellow mastic
10	Tan w/tan streaks 12x12 FT-yellow mastic
11	White sink undercoat
12	New drywall
13	New joint compound
14	Tape seam on new DW
15	Tan w/gray streaks 9x9 FT-black mastic
16	White 2'x4' Lg. fissure/small fissure CT
17	White 12x12 Rough Text. CT/black glue/Plas
18	Gray floor filler
19	Brown glue
20	Yellow carpet mastic
21	Gray floor leveler
22	White 12x12 w/gray speck FT-yellow mastic
23	Green carpet mastic
24	Navy 12x12 FT-yellow mastic
25	Light blue 12x12 FT-yellow mastic
26	Gray w/gray streak 12x12 FT-yellow mastic
27	Blue w/blue streaks 12x12 FT-yellow mastic
28	Yellow glue
29	White w/black streak 12x12 FT-yellow mast.
30	Black 12x12 FT-yellow mastic
31	Wall texture
32	Yellow glue
33	Brown cove base w/tan mastic
34	Gray cove base with white mastic
35	White 2x4 pinhole/pot mark CT
36	White 2x4 pinhole/large fissure CT
37	Black floor mastic
38	White 2x4 drywall w/vinyl cover CT
39	White wall texture
40	Yellow carpet mastic
41	Tan painted texture with drywall
42	Green/White joint tape
43	White wall texture
44	Off white w/gray speck 12x12 FT-yellow mastic
45	Brown-brown speck 12x12 FT-yellow mastic

Highlight = Positive for asbestos

HOMOGENEOUS MATERIALS LIST
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

No.	Material Description
46	Yellow carpet mastic
47	Brown 4" cove base with tan mastic
48	Black 4" cove base with yellow mastic
49	White 2'x4' pinhole/potmark CT
50	Navy blue 4" cove base w/yellow mastic
51	White wall texture
52	Yellow carpet mastic
53	Black vinyl tread w/no mastic
54	Blue w/blue specks 12x12 FT-yellow mastic
55	Tan duct glue
56	Yellow glue
57	Brown 4" cove base with brown mastic
58	Black glue
59	Brown glue
60	Brown 12x12 FT-black mastic
61	Off white 12x12 FT-black mastic
62	2" black cove base w/ brown mastic
63	White sandy texture surfacing material
64	White 12x12 pencil hole CT/brown glue dot
65	Yellow carpet mastic
66	Tan w/red streaks 12x12 FT-black mastic
67	Tan w/tan streaks 12x12 FT-black mastic
68	Tan painted wall texture
69	White floor leveler
70	Yellow carpet mastic
71	White 2'x4' pinhole/pot mark CT
72	Black mirror mastic
73	Gray 12x12 FT-black mastic
74	Tan painted 12x12 CT/brown glue dot
75	Green floor covering
76	White wall texture
77	White ceiling texture
78	Gray/ white streaks 12x12 FT-black mastic
79	White 12x12 pinhole/sm. fiss. CT-brown glue
80	Virmiculite wall insulation
81	Black mastic
82	White 2'x4' pinhole CT
83	White 2'x4' pinhole/long fissure CT
84	White 2'x4' small hole CT
85	White CMU block filler
86	White CP-11 sealant on fiberglass joint
87	Fireproofing-feed the children
88	Fireproofing-hall telecom closet
89	Fireproofing overspray above hall ceiling

Highlight = Positive for asbestos

APPENDIX C

ACM SAMPLE SUMMARY SHEET

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-15-1-1	Off white vibration joint cloth	Equip. Rm.	15	North wall	Fair	No	ND	ND
72-15-1-2	Off white vibration joint cloth	Equip. Rm.	15	North wall	Fair	No	ND	ND
72-15-1-3	Off white vibration joint cloth	Equip. Rm.	15	North wall	Fair	No	ND	ND
72-EP-2-4	Ceiling drywall	Ceiling	Elevator Penthouse	East	Fair	No	Chrysotile	Drywall=ND Trace on joint compound
72-EP-2-5	Ceiling drywall	Ceiling	Elevator Penthouse	Center	Fair	No	ND	ND
72-EP-2-6	Ceiling drywall	Ceiling	Elevator Penthouse	West	Fair	No	ND	ND
72-EP-3-7	Ceiling joint compound	Ceiling	Elevator Penthouse	East	Fair	Yes	Chrysotile	Drywall=ND 2% in joint compound
72-EP-3-8	Ceiling joint compound	Ceiling	Elevator Penthouse	Center	Fair	Yes		PS-NA
72-EP-3-9	Ceiling joint compound	Ceiling	Elevator Penthouse	West	Fair	Yes		PS-NA
72-14-4-10	White surfacing material on drywall	Valve Storage	14	South wall	Fair	Yes	ND	ND
72-14-4-11	White surfacing material on drywall	Valve Storage	14	South wall	Fair	Yes	ND	ND
72-14-4-12	White surfacing material on drywall	Valve Storage	14	East wall	Fair	Yes	ND	ND
72-14-5-13	White surfacing material on drywall	Air Duct	14	Exterior Shaft-West wall	Poor	Yes	Chrysotile	Drywall=ND Trace on joint compound
72-14-5-14	White surfacing material on drywall	Air Duct	14	Exterior Shaft-West wall	Poor	Yes		Drywall=ND Trace on joint compound
72-14-5-15	White surfacing material on drywall	Air Duct	14	Exterior Shaft-South wall	Poor	Yes		Drywall=ND Trace on joint compound
72-14-6-16	White 2'x4' pinhole and small fissure CT	14.006	14	Ceiling-NE corner office	Fair	Yes	ND	ND
72-14-6-17	White 2'x4' pinhole and small fissure CT	14.044A	14	Ceiling-NW Column	Fair	Yes	ND	ND
72-14-6-18	White 2'x4' pinhole and small fissure CT	14.031	14	Ceiling at south wall	Fair	Yes	ND	ND
72-14-7-19	Gray 4" cove base with yellow mastic	14.006	14	NE corner office	Good	No	ND	ND
72-14-7-20	Gray 4" cove base with yellow mastic	Hall	14	SW hallway near entrance	Good	No	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-14-7-21	Gray 4" cove base with yellow mastic	14.022	14	NE corner office-south wall	Good	No	ND	ND
72-14-8-22	Green carpet mastic	14.002	14	Under 14th floor carpet squares	Good	No	ND	ND
72-14-8-23	Green carpet mastic	14.007	14	Under 14th floor carpet squares	Good	No	ND	ND
72-14-8-24	Green carpet mastic	14.024	14	Under 14th floor carpet squares	Good	No	ND	ND
72-14-9-25	Gray w/gray streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Good	No	ND	ND
72-14-9-26	Gray w/gray streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Good	No	ND	ND
72-14-9-27	Gray w/gray streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Good	No	ND	ND
72-14-10-28	Tan w/tan streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Fair	No	ND	ND
72-14-10-29	Tan w/tan streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Fair	No	ND	ND
72-14-10-30	Tan w/tan streaks 12x12 FT-yellow mastic	Floor	14	NE break room	Fair	No	ND	ND
72-14-11-31	White sink undercoat	NE Break Room	14	Under sink in NE break room	Fair	No	ND	ND
72-14-11-32	White sink undercoat	NE Break Room	14	Under sink in NE break room	Fair	No	ND	ND
72-14-11-33	White sink undercoat	NE Break Room	14	Under sink in NE break room	Fair	No	ND	ND
72-14-12-34	New drywall	14.049	14	South wall	Fair	No	ND	ND
72-14-12-35	New drywall	14.049	14	North wall	Fair	No	ND	ND
72-14-12-36	New drywall	14.049	14	North wall	Fair	No	ND	ND
72-14-13-37	New joint compound	14.049	14	South wall	Fair	Yes	ND	ND
72-14-13-38	New joint compound	14.049	14	North wall	Fair	Yes	ND	ND
72-14-13-39	New joint compound	14.049	14	North wall	Fair	Yes	ND	ND
72-14-14-40	Tape seam on new DW	14.049	14	South wall	Fair	Yes	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-14-14-41	Tape seam on new DW	14.049	14	North wall	Fair	Yes	ND	ND
72-14-14-42	Tape seam on new DW	14.049	14	North wall	Fair	Yes	ND	ND
72-11-15-43	Tan w/gray streaks 9x9 FT-black mastic	NW Office	11	Floor	Good	No	Chrysotile	Floor tile = 5% Mastic = 10%
72-11-15-44	Tan w/gray streaks 9x9 FT-black mastic	NW Office	11	Floor	Fair	No		PS-NA
72-11-15-45	Tan w/gray streaks 9x9 FT-black mastic	NW Office	11	Floor	Fair	No		PS-NA
72-11-16-46	White 2'x4' Lg. fissure/small fissure CT	NW Office	11	Ceiling	Fair	Yes	ND	ND
72-11-16-47	White 2'x4' Lg. fissure/small fissure CT	NW Office	11	Ceiling	Fair	Yes	ND	ND
72-11-16-48	White 2'x4' Lg. fissure/small fissure CT	NW Office	11	Ceiling	Fair	Yes	ND	ND
72-11-17-49	White 12x12 Rough Text. CT/black glue/Plas	NW Office	11	Ceiling	Fair	Yes	Chrysotile	CT&Plaster = ND Black Glue Dot = 5%
72-11-17-50	White 12x12 Rough Text. CT/black glue/Plas	NW Office	11	Ceiling	Fair	Yes		PS-NA
72-11-17-51	White 12x12 Rough Text. CT/black glue/Plas	NW Office	11	Ceiling	Fair	Yes		PS-NA
72-11-18-52	Gray floor filler	Floor	11	Over south walker duct	Fair	No	ND	ND
72-11-18-53	Gray floor filler	Floor	11	Over south walker duct	Fair	No	Chrysotile	Floor filler = ND Black Mastic = 10%
72-11-18-54	Gray floor filler	Floor	11	Over south walker duct	Fair	No		Floor filler = ND Black Mastic = 10%
72-11-19-55	Brown glue	South Wall	11	Behind wood paneling	Fair	No	Chrysotile	Joint compound = 2% Brown Glue = 7%
72-11-19-56	Brown glue	South Wall	11	Behind wood paneling	Fair	No		PS-NA
72-11-19-57	Brown glue	South Wall	11	Behind wood paneling	Fair	No		PS-NA
72-14-20-58	Yellow carpet mastic	14.049	14	Under 2'x2' carpet tile-throughout	Fair	No	ND	ND
72-14-20-59	Yellow carpet mastic	14.043	14	Under 2'x2' carpet tile-throughout	Fair	No	ND	ND
72-14-20-60	Yellow carpet mastic	14.036	14	Under 2'x2' carpet tile-throughout	Fair	No	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-7-21-61	Gray floor leveler	Floor	7	Under carpet throughout	Fair	No	Chrysotile	Filler mixed with black mastic = 2%
72-7-21-62	Gray floor leveler	Floor	7	Under carpet throughout	Fair	No		PS-NA
72-7-21-63	Gray floor leveler	Floor	7	Under carpet throughout	Fair	No		PS-NA
72-3-22-64	White 12x12 w/gray speck FT-yellow mastic	Elev. Lobby	3	Server room floor	Fair	No	ND	ND
72-3-22-65	White 12x12 w/gray speck FT-yellow mastic	Elev. Lobby	3	Server room floor	Fair	No	ND	ND
72-3-22-66	White 12x12 w/gray speck FT-yellow mastic	Elev. Lobby	3	Server room floor	Fair	No	ND	ND
72-3-23-67	Green carpet mastic	Elev. Lobby	3	Elevator lobby floor	Fair	No	ND	ND
72-3-23-68	Green carpet mastic	Elev. Lobby	3	Elevator lobby floor	Fair	No	ND	ND
72-3-23-69	Green carpet mastic	Elev. Lobby	3	Elevator lobby floor	Fair	No	ND	ND
72-3-24-70	Navy 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-3-24-71	Navy 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-3-24-72	Navy 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-3-25-73	Light blue 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-3-25-74	Light blue 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-3-25-75	Light blue 12x12 FT-yellow mastic	Break Room	3	East center floor	Fair	No	ND	ND
72-2-26-76	Gray w/gray streak 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Fair	No	ND	ND
72-2-26-77	Gray w/gray streak 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Fair	No	ND	ND
72-2-26-78	Gray w/gray streak 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Fair	No	ND	ND
72-2-27-79	Blue w/blue streaks 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Fair	No	ND	ND
72-2-27-80	Blue w/blue streaks 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Fair	No	ND	ND

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72-2-27-81	Blue w/blue streaks 12x12 FT-yellow mastic	Open Area	2	Southwest area on floor	Poor	Yes	ND	ND
72-2-28-83	Yellow glue	Hall	2	East area wall behind plastic wall covering	Poor	Yes	ND	ND
72-2-28-84	Yellow glue	Hall	2	East area wall behind plastic wall covering	Poor	Yes	ND	ND
72-2-28-85	Yellow glue	Hall	2	East area wall behind plastic wall covering	Poor	Yes	ND	ND
72-1-29-85	White w/black streak 12x12 FT-yellow mast.	Golden Dragon	1	Floor	Poor	Yes	ND	ND
72-1-29-86	White w/black streak 12x12 FT-yellow mast.	Golden Dragon	1	Floor	Poor	No	ND	ND
72-1-29-87	White w/black streak 12x12 FT-yellow mast.	Golden Dragon	1	Floor	Poor	No	ND	ND
72-1-30-88	Black 12x12 FT-yellow mastic	Golden Dragon	1	Floor	Poor	No	ND	ND
72-1-30-89	Black 12x12 FT-yellow mastic	Golden Dragon	1	Floor	Fair	No	ND	ND
72-1-30-90	Black 12x12 FT-yellow mastic	Golden Dragon	1	Floor	Fair	No	ND	ND
72-1-31-91	Wall texture	Golden Dragon	1	NW column	Fair	Yes	ND	ND
72-1-31-92	Wall texture	Golden Dragon	1	NW column	Fair	Yes	ND	ND
72-1-31-93	Wall texture	Golden Dragon	1	NW column	Fair	Yes	ND	ND
72-1-32-94	Yellow glue	Golden Dragon	1	South kitchen wall	Fair	No	ND	ND
72-1-32-95	Yellow glue	Golden Dragon	1	South kitchen wall	Fair	No	ND	ND
72-1-32-96	Yellow glue	Golden Dragon	1	South kitchen wall	Fair	No	ND	ND
72-1-33-97	Brown cove base w/tan mastic	Golden Dragon	1	NW column	Fair	No	ND	ND
72-1-33-98	Brown cove base w/tan mastic	Golden Dragon	1	NW column	Fair	No	ND	ND
72-1-33-99	Brown cove base w/tan mastic	Golden Dragon	1	NW column	Fair	No	ND	ND
72-1-34-100	Gray cove base with white mastic	Golden Dragon	1	Kitchen wall	Fair	No	ND	ND

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72-1-34-101	Gray cove base with white mastic	Golden Dragon	1	Kitchen wall	Fair	No	ND	ND
72-1-34-102	Gray cove base with white mastic	Golden Dragon	1	Kitchen wall	Fair	No	ND	ND
72-1-35-103	White 2x4 pinhole/pot mark CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-35-104	White 2x4 pinhole/pot mark CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-35-105	White 2x4 pinhole/pot mark CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-36-106	White 2x4 pinhole/large fissure CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-36-107	White 2x4 pinhole/large fissure CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-36-108	White 2x4 pinhole/large fissure CT	Golden Dragon	1	North ceiling	Fair	Yes	ND	ND
72-1-37-109	Black floor mastic	Golden Dragon	1	North floor	Fair	No	ND	ND
72-1-37-110	Black floor mastic	Golden Dragon	1	North floor	Fair	No	ND	ND
72-1-37-111	Black floor mastic	Golden Dragon	1	North floor	Fair	No	ND	ND
72-1-38-112	White 2x4 drywall w/vinyl cover CT	Golden Dragon	1	Kitchen ceiling	Fair	Yes	ND	ND
72-1-38-113	White 2x4 drywall w/vinyl cover CT	Golden Dragon	1	Kitchen ceiling	Fair	Yes	ND	ND
72-1-38-114	White 2x4 drywall w/vinyl cover CT	Golden Dragon	1	Kitchen ceiling	Fair	Yes	ND	ND
72-1-39-115	White wall texture	Feed the Children	1	NE wall	Fair	Yes	ND	ND
72-1-39-116	White wall texture	Feed the Children	1	NE wall	Fair	Yes	ND	ND
72-1-39-117	White wall texture	Feed the Children	1	NE wall	Fair	Yes	Chrysotile	Trace
72-1-40-118	Yellow carpet mastic	Feed the Children	1	NE corner floor	Fair	No	ND	ND
72-1-40-119	Yellow carpet mastic	Feed the Children	1	NE corner floor	Fair	No	ND	ND
72-1-40-120	Yellow carpet mastic	Feed the Children	1	NE corner floor	Fair	No	ND	ND

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72-1-41-121	Tan painted texture with drywall	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-41-122	Tan painted texture with drywall	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-41-123	Tan painted texture with drywall	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-42-124	Green/White joint tape	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-42-125	Green/White joint tape	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-42-126	Green/White joint tape	Feed the Children	1	North center column	Fair	No	ND	ND
72-1-43-127	White wall texture	Feed the Children	1	Restroom wall	Fair	No	ND	ND
72-1-43-128	White wall texture	Feed the Children	1	Restroom wall	Fair	No	ND	ND
72-1-43-129	White wall texture	Feed the Children	1	Restroom wall	Fair	No	ND	ND
72-1-44-130	Off white w/gray speck 12x12 FT-yellow mastic	LT's	1	Kitchen floor	Fair	Yes	ND	ND
72-1-44-131	Off white w/gray speck 12x12 FT-yellow mastic	LT's	1	Kitchen floor	Fair	Yes	ND	ND
72-1-44-132	Off white w/gray speck 12x12 FT-yellow mastic	LT's	1	Kitchen floor	Fair	Yes	ND	ND
72-1-45-133	Brown-brown speck 12x12 FT-yellow mastic	LT's	1	Dining room floor	Fair	Yes	ND	ND
72-1-45-134	Brown-brown speck 12x12 FT-yellow mastic	LT's	1	Dining room floor	Fair	Yes	ND	ND
72-1-45-135	Brown-brown speck 12x12 FT-yellow mastic	LT's	1	Dining room floor	Fair	Yes	ND	ND
72-1-46-136	Yellow carpet mastic	LT's	1	Dining room floor	Fair	No	ND	ND
72-1-46-137	Yellow carpet mastic	LT's	1	Dining room floor	Fair	No	ND	ND
72-1-46-138	Yellow carpet mastic	LT's	1	Dining room floor	Fair	No	ND	ND
72-1-47-139	Brown 4" cove base with tan mastic	LT's	1	Dining room wall	Fair	No	ND	ND
72-1-47-140	Brown 4" cove base with tan mastic	LT's	1	Dining room wall	Fair	No	ND	ND

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72-1-47-141	Brown 4" cove base with tan mastic	LT's	1	Dining room wall	Fair	No	ND	ND
72-1-48-142	Black 4" cove base with yellow mastic	LT's	1	Kitchen wall	Fair	No	ND	ND
72-1-48-143	Black 4" cove base with yellow mastic	LT's	1	Kitchen wall	Fair	No	ND	ND
72-1-48-144	Black 4" cove base with yellow mastic	LT's	1	Kitchen wall	Fair	No	ND	ND
72-1-49-145	White 2'x4' pinhole/potmark CT	LT's	1	Dining room ceiling	Fair	Yes	ND	ND
72-1-49-146	White 2'x4' pinhole/potmark CT	LT's	1	Dining room ceiling	Fair	Yes	ND	ND
72-1-49-147	White 2'x4' pinhole/potmark CT	LT's	1	Dining room ceiling	Fair	Yes	ND	ND
72-1-50-148	Navy blue 4" cove base w/yellow mastic	Mary F. Office	1	Office wall	Fair	No	ND	ND
72-1-50-149	Navy blue 4" cove base w/yellow mastic	Mary F. Office	1	Office wall	Fair	No	ND	ND
72-1-50-150	Navy blue 4" cove base w/yellow mastic	Mary F. Office	1	Office wall	Fair	No	ND	ND
72-1-51-151	White wall texture	Mary F. Office	1	Office wall	Fair	Yes	ND	ND
72-1-51-152	White wall texture	Mary F. Office	1	Office wall	Fair	Yes	ND	ND
72-1-51-153	White wall texture	Mary F. Office	1	Office wall	Fair	Yes	ND	ND
72-1-52-154	Yellow carpet mastic	Mary F. Office	1	Under carpet throughout	Fair	No	ND	ND
72-1-52-155	Yellow carpet mastic	Mary F. Office	1	Under carpet throughout	Fair	No	ND	ND
72-1-52-156	Yellow carpet mastic	Mary F. Office	1	Under carpet throughout	Fair	No	ND	ND
72-1-53-157	Black vinyl tread w/no mastic	Mary F. Office	1	IT room floor	Fair	No	ND	ND
72-1-53-158	Black vinyl tread w/no mastic	Mary F. Office	1	IT room floor	Fair	No	ND	ND
72-1-53-159	Black vinyl tread w/no mastic	Mary F. Office	1	IT room floor	Fair	No	ND	ND
72-1-54-160	Blue w/blue specks 12x12 FT-yellow mastic	Mary F. Office	1	Restroom floor	Fair	No	ND	ND

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Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-1-54-161	Blue w/blue specks 12x12 FT-yellow mastic	Mary F. Office	1	Restroom floor	Fair	No	ND	ND
72-1-54-162	Blue w/blue specks 12x12 FT-yellow mastic	Mary F. Office	1	Restroom floor	Fair	No	ND	ND
72-1-55-163	Tan duct glue	Mary F. Office	1	HVAC duct above drop ceiling	Fair	No	ND	ND
72-1-55-164	Tan duct glue	Mary F. Office	1	HVAC duct above drop ceiling	Fair	No	ND	ND
72-1-55-165	Tan duct glue	Mary F. Office	1	HVAC duct above drop ceiling	Fair	No	ND	ND
72-B-56-166	Yellow glue	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-56-167	Yellow glue	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-56-168	Yellow glue	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-57-169	Brown 4" cove base with brown mastic	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-57-170	Brown 4" cove base with brown mastic	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-57-171	Brown 4" cove base with brown mastic	Down-towner	Basement	Restaurant walls	Fair	No	ND	ND
72-B-58-172	Black glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No	Chrysotile	Black Glue = 4%
72-B-58-173	Black glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No		PS-NA
72-B-58-174	Black glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No		PS-NA
72-B-59-175	Brown glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No	Chrysotile	Brown Glue = 15%
72-B-59-176	Brown glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No		PS-NA
72-B-59-177	Brown glue	Down-towner	Basement	Restaurant walls behind wood panels	Fair	No		PS-NA
72-B-60-178	Brown 12x12 FT-black mastic	Down-towner	Basement	Restaurant floor	Fair	No	Chrysotile	Floor tile = ND Mastic = 5%
72-B-60-179	Brown 12x12 FT-black mastic	Down-towner	Basement	Restaurant floor	Fair	No		PS-NA
72-B-60-180	Brown 12x12 FT-black mastic	Down-towner	Basement	Restaurant floor	Fair	No		PS-NA

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Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-B-61-181	Off white 12x12 FT-black mastic	N. Open Area	Basement	floor	Fair	No	Chrysotile	Floor tile = ND Mastic = 8%
72-B-61-182	Off white 12x12 FT-black mastic	N. Open Area	Basement	floor	Fair	No		PS-NA
72-B-61-183	Off white 12x12 FT-black mastic	N. Open Area	Basement	floor	Fair	No		PS-NA
72-B-62-184	2" black cove base w/ brown mastic	N. Open Area	Basement	West wall	Fair	No	ND	ND
72-B-62-185	2" black cove base w/ brown mastic	N. Open Area	Basement	West wall	Fair	No	ND	ND
72-B-62-186	2" black cove base w/ brown mastic	N. Open Area	Basement	West wall	Fair	No	ND	ND
72-B-63-187	White sandy texture surfacing material	N. Open Area	Basement	East wall	Fair	No	ND	ND
72-B-63-188	White sandy texture surfacing material	N. Open Area	Basement	East wall	Fair	No	ND	ND
72-B-63-189	White sandy texture surfacing material	N. Open Area	Basement	East wall	Fair	No	ND	ND
72-B-64-190	White 12x12 pencil hole CT/brown glue dot	SW RM	Basement	Ceiling	Fair	Yes	ND	ND
72-B-64-191	White 12x12 pencil hole CT/brown glue dot	SW RM	Basement	Ceiling	Fair	Yes	ND	ND
72-B-64-192	White 12x12 pencil hole CT/brown glue dot	SW RM	Basement	Ceiling	Fair	Yes	ND	ND
72-B-65-193	Yellow carpet mastic	SW RM	Basement	Floor under green carpet	Fair	No	ND	ND
72-B-65-194	Yellow carpet mastic	SW RM	Basement	Floor under green carpet	Fair	No	ND	ND
72-B-65-195	Yellow carpet mastic	SW RM	Basement	Floor under green carpet	Fair	No	ND	ND
72-B-66-196	Tan w/red streaks 12x12 FT-black mastic	Center RM	Basement	Floor	Fair	No	Chrysotile	Floor tile = ND Mastic = 3%
72-B-66-197	Tan w/red streaks 12x12 FT-black mastic	Center RM	Basement	Floor	Fair	No		PS-NA
72-B-66-198	Tan w/red streaks 12x12 FT-black mastic	Center RM	Basement	Floor	Fair	No		PS-NA
72-B-67-199	Tan w/tan streaks 12x12 FT-black mastic	Server Room	Basement	Floor	Fair	No	Chrysotile	Floor tile = ND Mastic = 3%
72-B-67-200	Tan w/tan streaks 12x12 FT-black mastic	Server Room	Basement	Flor	Fair	No		PS-NA

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72-B-67-201	Tan w/tan streaks 12x12 FT-black mastic	Server Room	Basement	Floor	Fair	No	Chrysotile	PS-NA
72-B-68-202	Tan painted wall texture	Dream Studio	Basement	Walls	Fair	Yes	ND	ND
72-B-68-203	Tan painted wall texture	Dream Studio	Basement	Walls	Fair	Yes	ND	ND
72-B-68-204	Tan painted wall texture	Dream Studio	Basement	Walls	Fair	Yes	ND	ND
72-B-69-205	White floor leveler	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-69-206	White floor leveler	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-69-207	White floor leveler	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-70-208	Yellow carpet mastic	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-70-209	Yellow carpet mastic	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-70-210	Yellow carpet mastic	Janitor Area	Basement	Floor	Fair	No	ND	ND
72-B-71-211	White 2'x4' pinhole/pot mark CT	Janitor Area	Basement	Ceiling	Fair	Yes	ND	ND
72-B-71-212	White 2'x4' pinhole/pot mark CT	Janitor Area	Basement	Ceiling	Fair	Yes	ND	ND
72-B-71-213	White 2'x4' pinhole/pot mark CT	Janitor Area	Basement	Ceiling	Fair	Yes	ND	ND
72-B-72-214	Black mirror mastic	Escalator	Basement	Behind mirror panel	Fair	No	ND	ND
72-B-72-215	Black mirror mastic	Escalator	Basement	Behind mirror panel	Fair	No	ND	ND
72-B-72-216	Black mirror mastic	Escalator	Basement	Behind mirror panel	Fair	No	ND	ND
72-B-73-217	Gray 12x12 FT-black mastic	West Vestibule	Basement	Floor	Fair	No	Chrysotile	Floor tile = ND Mastic = 8%
72-B-73-218	Gray 12x12 FT-black mastic	West Vestibule	Basement	Floor	Fair	No		PS-NA
72-B-73-219	Gray 12x12 FT-black mastic	West Vestibule	Basement	Floor	Fair	No		PS-NA
72-B-74-220	Tan painted 12x12 CT/brown glue dot	S. Freight Elev.	Basement	East wall	Fair	Yes	ND	ND

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72-B-74-221	Tan painted 12x12 CT/brown glue dot	S. Freight Elev.	Basement	North wall	Fair	Yes	ND	ND
72-B-74-222	Tan painted 12x12 CT/brown glue dot	S. Freight Elev.	Basement	South wall	Fair	Yes	ND	ND
72-B-75-223	Green floor covering	S. Freight Elev.	Basement	Floor	Fair	No	ND	ND
72-B-75-224	Green floor covering	S. Freight Elev.	Basement	Floor	Fair	No	ND	ND
72-B-75-225	Green floor covering	S. Freight Elev.	Basement	Floor	Fair	No	ND	ND
72-B-76-226	White wall texture	Escalator	Basement	Wall	Fair	Yes	Chrysotile	Trace
72-B-76-227	White wall texture	Escalator	Basement	Wall	Fair	Yes		Trace
72-B-76-228	White wall texture	Escalator	Basement	Wall	Fair	Yes		Trace
72-B-77-229	White ceiling texture	Escalator	Basement	Ceiling	Fair	Yes	Chrysotile	Trace
72-B-77-230	White ceiling texture	Escalator	Basement	Ceiling	Fair	Yes		Texture = 2%
72-B-77-231	White ceiling texture	Escalator	Basement	Ceiling	Fair	Yes		Texture = 2%
72-SB-78-232	Gray/ white streaks 12x12 FT-black mastic	Vault	Sub-Basement	All floors throughout sub-basement	Fair	No	Chrysotile	Floor tile = 5% Mastic = 8%
72-SB-78-233	Gray/ white streaks 12x12 FT-black mastic	Vault	Sub-Basement	All floors throughout sub-basement	Fair	No		PS-NA
72-SB-78-234	Gray/ white streaks 12x12 FT-black mastic	Vault	Sub-Basement	All floors throughout sub-basement	Fair	No		PS-NA
72-SB-79-235	White 12x12 pinhole/sm. fiss. CT-brown glue	Vault	Sub-Basement	Ceiling	Fair	Yes	ND	ND
72-SB-79-236	White 12x12 pinhole/sm. fiss. CT-brown glue	Vault	Sub-Basement	Ceiling	Fair	Yes	ND	ND
72-SB-79-237	White 12x12 pinhole/sm. fiss. CT-brown glue	Vault	Sub-Basement	Ceiling	Fair	Yes	ND	ND
72-SB-80-238	Virmiculite wall insulation	Fire Pump Room	Sub-Basement	Inside drywall walls	Fair	Yes	Tremolite & Actinolite	Trace
72-SB-80-239	Virmiculite wall insulation	Fire Pump Room	Sub-Basement	Inside drywall walls	Fair	Yes		Trace
72-SB-80-240	Virmiculite wall insulation	Fire Pump Room	Sub-Basement	Inside drywall walls	Fair	Yes		Trace

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72-SB-81-241	Black mastic	East Area	Sub-Basement	Eastern -most area, behind mirror panel	Fair	No	Chrysotile	Black Mastic = 10%
72-SB-81-242	Black mastic	East Area	Sub-Basement	Eastern -most area, behind mirror panel	Fair	No		PS-NA
72-SB-81-243	Black mastic	East Area	Sub-Basement	Eastern -most area, behind mirror panel	Fair	No		PS-NA
72-SB-82-244	White 2'x4' pinhole CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-82-245	White 2'x4' pinhole CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-82-246	White 2'x4' pinhole CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-83-247	White 2'x4' pinhole/long fissure CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-83-248	White 2'x4' pinhole/long fissure CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-83-249	White 2'x4' pinhole/long fissure CT	Center Area	Sub-Basement	Kitchen ceiling	Fair	Yes	ND	ND
72-SB-84-250	White 2'x4' small hole CT	Center Area	Sub-Basement	Kitchen and storage room ceiling	Fair	Yes	ND	ND
72-SB-84-251	White 2'x4' small hole CT	Center Area	Sub-Basement	Kitchen and storage room ceiling	Fair	Yes	ND	ND
72-SB-84-252	White 2'x4' small hole CT	Center Area	Sub-Basement	Kitchen and storage room ceiling	Fair	Yes	ND	ND
72-SB-85-253	White CMU block filler	Hall Corridor	Sub-Basement	CMU wall block under stairs	Fair	No	ND	ND
72-SB-85-254	White CMU block filler	Hall Corridor	Sub-Basement	CMU wall block under stairs	Fair	No	ND	ND
72-SB-85-255	White CMU block filler	Hall Corridor	Sub-Basement	CMU wall block under stairs	Fair	No	ND	ND
72-SB-86-256	White CP-11 sealant on fiberglass joint	Hall Corridor	Sub-Basement	On white fiberglass insulation by stairs	Fair	No	ND	ND
72-SB-86-257	White CP-11 sealant on fiberglass joint	Hall Corridor	Sub-Basement	On white fiberglass insulation by stairs	Fair	No	ND	ND
72-SB-86-258	White CP-11 sealant on fiberglass joint	Hall Corridor	Sub-Basement	On white fiberglass insulation by stairs	Fair	No	ND	ND
72-1-87-259	Fireproofing-feed the children	Feed the Children	1	Southeast column-base	Fair	Yes	ND	ND
72-1-87-260	Fireproofing-feed the children	Feed the Children	1	Northeast spandrel beam/column	Fair	Yes	ND	ND

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

ACM SAMPLE SUMMARY SHEET
FIRST NATIONAL CENTER
(EAST BUILDING-1972)
120 NORTH ROBINSON AVENUE
OKLAHOMA CITY, OKLAHOMA 73102

Sample Number	Material Description	Room or Area	Floor	Location	Condition	Friable	Asbestos Type	% Asbestos/Layer
72-1-88-261	Fireproofing-hall telecom closet	Telecom Closet	1	Main hall closet, above drywall wall	Fair	Yes	ND	ND
72-1-89-262	Fireproofing overspray above hall ceiling	Hall Ceiling	1	Above white 2'x2' ceiling tile in hallway on HVAC duct	Fair	Yes	Chrysotile	Fireproofing = 4%

Acronyms: ND = Asbestos Not Detected PS-NA = Positive Stop-Not Analyzed
Highlight = Positive for asbestos

APPENDIX D

LABORATORY PLM ANALYTICAL DATA

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11/16/2016

Family Environmental, K.C.
600 East 8th Street, Suite B
Kansas City, MO 64106

Re: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)
PLM16-519

Mr. Dustman,
Attached are the results of Polarized Light Microscopic (PLM) analysis for asbestos contained in the bulk sample materials submitted to this facility on 11/17/2016

Bulk samples are analyzed in accordance with USEPA test method EPA/600/M4-82-020 and EPA/600/R-93/116, which requires that distinctly different materials or layers present within a sample be analyzed and reported separately. (For measurement uncertainty, refer to table 2.1 in EPA/600/R-93/116 method.) Sometimes it is not possible to completely separate thin or strongly adhering layers, such as paint or adhesive, and a combined result is given. For some complex materials, such as drywall/tape/mud joints, a composite or overall asbestos content may be reported in addition to individual layer results. RNET, Inc. is currently accredited for bulk asbestos analysis by the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST). Our NVLAP laboratory code number is 200448-0.

Due to the limitations of the EPA 600 Method, nonfriable organically bound materials (NOBs) such as floor tiles can be difficult to analyze via PLM. EPA recommends that all NOBs reported as non-detect by PLM analysis be further analyzed by Transmission Electron Microscopy for more definitive results. Please note that the PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation.

The analytical results provided in this report apply only to the samples submitted to the laboratory. This report is confidential. Details of this report will not be discussed with any person or agency not associated with you or your organization. This report must be reproduced in its entirety and shall not be copied in part or used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples will be held for a minimum of sixty days unless longer storage is requested. If you have any questions regarding the content of this report please call RNET, Inc. at 303-296-6022.

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NVLAP Lab Code 200448-0

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-01						
72-15-1-1	Membrane, Black and Tan, Homogeneous, Resinous/Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Resin	50% 50%
PLM16-519-02						
72-15-1-2	Membrane, Black and Tan, Homogeneous, Resinous/Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Resin	50% 50%
PLM16-519-03						
72-15-1-3	Membrane, Black and Tan, Homogeneous, Resinous/Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Resin	50% 50%
PLM16-519-04						
72-EP-2-4	LAYER 1 Drywall, Tan and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud with Paint, White and Off White, Non-homogeneous, Fine Grained	LAYER 2 10%	Chrysotile	Trace	Other Non-Fibrous Material	100%
PLM16-519-05						
72-EP-2-5	Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%
PLM16-519-06						
72-EP-2-6	Drywall, White, Brown, and Tan, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%
PLM16-519-07						
72-EP-3-7	LAYER 1 Drywall, Tan and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud with Paint, White, Non-homogeneous, Fine Grained	LAYER 2 10%	Chrysotile	2%	Other Non-Fibrous Material	98%
PLM16-519-08						
72-EP-3-8	Not Analyzed-First Positive Stop					
PLM16-519-09						
72-EP-3-9	Not Analyzed-First Positive Stop					
PLM16-519-10						
72-14-4-10	Mud with Paint, Tan, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-11						
72-14-4-11	Mud with Paint, Tan, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-12						
72-14-4-12	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	70% 30%
	LAYER 2 Mud with Paint, Tan, Non-homogeneous, Fine Grained	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-13						
72-14-5-13	Mud with Paint, Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-519-14						
72-14-5-14	Mud with Paint, Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-519-15						
72-14-5-15	Mud with Paint, Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-519-16						
72-14-6-16	Ceiling Tile, White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 40% 25%
PLM16-519-17						
72-14-6-17	Ceiling Tile, White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 40% 25%
PLM16-519-18						
72-14-6-18	Ceiling Tile, White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 40% 25%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-19						
72-14-7-19	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 80%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 20%	None Detected		Resin	100%
PLM16-519-20						
72-14-7-20	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 80%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 20%	None Detected		Resin	100%
PLM16-519-21						
72-14-7-21	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 80%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 20%	None Detected		Resin	100%
PLM16-519-22						
72-14-8-22	LAYER 1 Carpet with Rubber Back, Gray and Brown, Non-homogeneous, Resinous/Fibrous	LAYER 1 95%	None Detected		Fibrous Glass Synthetic Fiber Resin	10% 50% 40%
	LAYER 2 Mastic, Green, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-23						
72-14-8-23	LAYER 1 Carpet with Rubber Back, Gray and Brown, Non-homogeneous, Resinous/Fibrous	LAYER 1 95%	None Detected		Fibrous Glass Synthetic Fiber Resin	10% 50% 40%
	LAYER 2 Mastic, Green, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%

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PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-24						
72-14-8-24	LAYER 1 Carpet with Rubber Back, Gray and Brown, Non-homogeneous, Resinous/Fibrous	LAYER 1 95%	None Detected		Fibrous Glass Synthetic Fiber Resin	10% 50% 40%
	LAYER 2 Mastic, Green, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-25						
72-14-9-25	LAYER 1 Floor Tile, Brown, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-26						
72-14-9-26	LAYER 1 Floor Tile, Brown, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-27						
72-14-9-27	LAYER 1 Floor Tile, Brown, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-28						
72-14-10-28	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

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PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-29						
72-14-10-29	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-30						
72-14-10-30	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-31						
72-14-11-31	Coating, Gray, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-32						
72-14-11-32	Coating, Gray, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-33						
72-14-11-33	Coating, Gray, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-34						
72-14-12-34	Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%
PLM16-519-35						
72-14-12-35	Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%
PLM16-519-36						
72-14-12-36	Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-37						
72-14-13-37	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Mud, White, Homogeneous, Fine Grained	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-38						
72-14-13-38	Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	20% 80%
PLM16-519-39						
72-14-13-39	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 70%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Tape, Cream, Homogeneous, Fibrous	LAYER 2 10%	None Detected		Cellulose Fiber Other Non-Fibrous Material	99% 1%
	LAYER 3 Mud, White, Homogeneous, Fine Grained	LAYER 3 20%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-40						
72-14-14-40	Tape, Cream, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	99% 1%
PLM16-519-41						
72-14-14-41	Tape, Cream, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	99% 1%
PLM16-519-42						
72-14-14-42	Tape, Cream, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	99% 1%
PLM16-519-43						
72-11-15-43	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 5%	Chrysotile	10%	Resin	90%
	LAYER 2 Floor Tile, Pink, Homogeneous, Resinous	LAYER 2 90%	Chrysotile	5%	Resin	95%
	LAYER 3 Mastic, Yellow, Homogeneous, Resinous	LAYER 3 5%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-44 72-11-15-44	Not Analyzed-First Positive Stop					
PLM16-519-45 72-11-15-45	Not Analyzed-First Positive Stop					
PLM16-519-46 72-11-16-46	Ceiling Tile, White and Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	30% 30% 40%
PLM16-519-47 72-11-16-47	Ceiling Tile, White and Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	30% 30% 40%
PLM16-519-48 72-11-16-48	Ceiling Tile, White and Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	30% 30% 40%
PLM16-519-49 72-11-17-49	LAYER 1 Ceiling Tile, White, Non-homogeneous, Chalky	LAYER 1 60%	None Detected		Fibrous Glass Other Non-Fibrous Material	50% 50%
	LAYER 2 Glue, Brown, Homogeneous, Resinous	LAYER 2 20%	Chrysotile	5%	Resin	95%
	LAYER 3 Wallboard, White, Homogeneous, Fine Grained	LAYER 3 20%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-50 72-11-17-50	Not Analyzed-First Positive Stop					
PLM16-519-51 72-11-17-51	Not Analyzed-First Positive Stop					
PLM16-519-52 72-11-18-52	Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-53						
72-11-18-53	LAYER 1 Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 90%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	Chrysotile	10%	Resin	90%
PLM16-519-54						
72-11-18-54	LAYER 1 Leveler, Gray, Homogeneous, Coarse Grained	LAYER 1 90%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mastic, Black, Homogeneous, Resinous	LAYER 2 10%	Chrysotile	10%	Resin	90%
PLM16-519-55						
72-11-19-55	LAYER 1 Mud, Tan, Homogeneous, Fine Grained	LAYER 1 40%	Chrysotile	2%	Other Non-Fibrous Material	98%
	LAYER 2 Glue, Brown, Homogeneous, Resinous	LAYER 2 60%	Chrysotile	7%	Resin	93%
PLM16-519-56						
72-11-19-56	Not Analyzed-First Positive Stop					
PLM16-519-57						
72-11-19-57	Not Analyzed-First Positive Stop					
PLM16-519-58						
72-14-20-58	LAYER 1 Carpet Backing, Black and Brown, Homogeneous, Resinous	LAYER 1 95%	None Detected		Synthetic Fiber Resin	50% 50%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Resin	100%
PLM16-519-59						
72-14-20-59	LAYER 1 Carpet Backing, Black and Brown, Homogeneous, Resinous	LAYER 1 95%	None Detected		Synthetic Fiber Resin	50% 50%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-60						
72-14-20-60	LAYER 1 Carpet Backing, Black and Brown, Homogeneous, Resinous	LAYER 1 95%	None Detected		Synthetic Fiber Resin	50% 50%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Resin	100%
PLM16-519-61						
72-7-21-61	Gray Leveler with Inseparable Mastics, Gray, Clear, and Black, Non-homogeneous, Resinous	LAYER 1 100%	Chrysotile	2%	Resin/Other Non-Fibrous Material	98%
PLM16-519-62						
72-7-21-62	Not Analyzed-First Positive Stop					
PLM16-519-63						
72-7-21-63	Not Analyzed-First Positive Stop					
PLM16-519-64						
72-3-22-64	LAYER 1 Floor Tile, White and Gray, Homogeneous, Resinous	LAYER 1 95%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-65						
72-3-22-65	LAYER 1 Floor Tile, White and Gray, Homogeneous, Resinous	LAYER 1 95%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-66						
72-3-22-66	LAYER 1 Floor Tile, White and Gray, Homogeneous, Resinous	LAYER 1 95%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-519-67						
72-3-23-67	Mastic, Green, Homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-68						
72-3-23-68	Mastic, Green, Homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%
PLM16-519-69						
72-3-23-69	Mastic, Green, Homogeneous, Resinous	LAYER 1 100%	None Detected		Resin	100%
PLM16-519-70						
72-3-24-70	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-71						
72-3-24-71	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-72						
72-3-24-72	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-73						
72-3-25-73	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-74						
72-3-25-74	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-75						
72-3-25-75	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-76						
72-2-26-76	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-77						
72-2-26-77	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-78						
72-2-26-78	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-79						
72-2-27-79	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-80						
72-2-27-80	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-81						
72-2-27-81	LAYER 1 Floor Tile, Gray, Homogeneous, Resinous	LAYER 1 98%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 2%	None Detected		Resin	100%
PLM16-519-82						
72-2-28-83	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	15% 85%
PLM16-519-83						
72-2-28-84	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	15% 85%
PLM16-519-84						
72-2-28-85	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	15% 85%
PLM16-519-85						
72-1-29-85	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-86						
72-1-29-86	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-87						
72-1-29-87	LAYER 1 Floor Tile, Tan, Homogeneous, Resinous	LAYER 1 90%	None Detected		Binder/Filler	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-88						
72-1-30-88	Mud with Paint, White and Pink, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-89						
72-1-30-89	Mud with Paint, White and Pink, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-90						
72-1-30-90	Mud with Paint, White and Pink, Non-homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-91						
72-1-31-91	Mud with Paint, White and Pink, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-92						
72-1-31-92	Mud with Paint, White and Pink, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-519-93						
72-1-31-93	Mud with Paint, White and Pink, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-94						
72-1-32-94	LAYER 1 Mastic with Paint, Yellow and White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Paper with Mud, White and Brown, Non-homogeneous, Fine Grained/Fibrous	LAYER 2 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%
PLM16-519-95						
72-1-32-95	LAYER 1 Mastic with Paint, Yellow and White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Paper with Mud, White and Brown, Non-homogeneous, Fine Grained/Fibrous	LAYER 2 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%
PLM16-519-96						
72-1-32-96	LAYER 1 Mastic with Paint, Yellow and White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Paper with Mud, White and Brown, Non-homogeneous, Fine Grained/Fibrous	LAYER 2 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%
PLM16-519-97						
72-1-33-97	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-98						
72-1-33-98	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-99						
72-1-33-99	LAYER 1 Cove Base, Brown, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, Tan, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-100						
72-1-34-100	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, White, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-101						
72-1-34-101	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, White, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-102						
72-1-34-102	LAYER 1 Cove Base, Gray, Homogeneous, Rubbery	LAYER 1 90%	None Detected		Resin	100%
	LAYER 2 Mastic, White, Homogeneous, Resinous	LAYER 2 10%	None Detected		Resin	100%
PLM16-519-103						
72-1-35-103	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-519-104						
72-1-35-104	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-105						
72-1-35-105	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-519-106						
72-1-36-106	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-519-107						
72-1-36-107	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-5191-08						
72-1-36-108	Ceiling Tile, Gray, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	35% 35% 30%
PLM16-519-109						
72-1-37-109	Mastic, Brown, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	Trace 100%
PLM16-519-110						
72-1-37-110	Mastic, Brown, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	Trace 100%
PLM16-519-111						
72-1-37-111	Mastic, Brown, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Resin	Trace 100%
PLM16-519-112						
72-1-38-112	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Wall Covering, Tan, Homogeneous, Resinous/Fibrous	LAYER 2 10%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-519

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-519-113						
72-1-38-113	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Wall Covering, Tan, Homogeneous, Resinous/Fibrous	LAYER 2 10%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%
PLM16-519-114						
72-1-38-114	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	20% 80%
	LAYER 2 Wall Covering, Tan, Homogeneous, Resinous/Fibrous	LAYER 2 10%	None Detected		Cellulose Fiber Other Non-Fibrous Material	50% 50%

ADDITIONAL COMMENTS: All separable parts or layers (except paint) within the same sample are analyzed and reported individually. Composite asbestos percent is reported, if applicable, by visual estimation.

ND = None Detected TR = Trace, less than 1.0%

Analyst: Katie Shaw

Date: 11/21/2016

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-519

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-519-01	72-15-1-1	Off white vibration joint cloth	PLM	
02	72-15-1-2	Off white vibration joint cloth	PLM	
03	72-15-1-3	Off white vibration joint cloth	PLM	
04	72-EP-2-4	Ceiling drywall	PLM	
05	72-EP-2-5	Ceiling drywall	PLM	
06	72-EP-2-6	Ceiling drywall	PLM	
07	72-EP-3-7	Ceiling joint compound	PLM	
08	72-EP-3-8	Ceiling joint compound	PLM	
09	72-EP-3-9	Ceiling joint compound	PLM	
10	72-14-4-10	White surfacing material on drywall	PLM	
11	72-14-4-11	White surfacing material on drywall	PLM	
12	72-14-4-12	White surfacing material on drywall	PLM	
13	72-14-5-13	White surfacing material on drywall	PLM	
14	72-14-5-14	White surfacing material on drywall	PLM	
15	72-14-5-15	White surfacing material on drywall	PLM	
16	72-14-6-16	White 2'x4' pinhole and small fissure CT	PLM	
17	72-14-6-17	White 2'x4' pinhole and small fissure CT	PLM	
18	72-14-6-18	White 2'x4' pinhole and small fissure CT	PLM	
19	72-14-7-19	Gray 4" cove base with yellow mastic	PLM	
20	72-14-7-20	Gray 4" cove base with yellow mastic	PLM	

Total Number of Samples: 1- 20 of 114 Sample Condition (Accept/Reject): Accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016

Received by: M Urdiales Date/Time: 11/17/16 11:00am

Relinquished by: _____ Date/Time: _____

Received by: _____ Date/Time: _____

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Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-519-21	72-14-7-21	Gray 4" cove base with yellow mastic	PLM	
22	72-14-8-22	Green carpet mastic	PLM	
23	72-14-8-23	Green carpet mastic	PLM	
24	72-14-8-24	Green carpet mastic	PLM	
25	72-14-9-25	Gray w/gray streaks 12x12 FT-yellow mastic	PLM	
26	72-14-9-26	Gray w/gray streaks 12x12 FT-yellow mastic	PLM	
27	72-14-9-27	Gray w/gray streaks 12x12 FT-yellow mastic	PLM	
28	72-14-10-28	Tan w/tan streaks 12x12 FT-yellow mastic	PLM	
29	72-14-10-29	Tan w/tan streaks 12x12 FT-yellow mastic	PLM	
30	72-14-10-30	Tan w/tan streaks 12x12 FT-yellow mastic	PLM	
31	72-14-11-31	White sink undercoat	PLM	
32	72-14-11-32	White sink undercoat	PLM	
33	72-14-11-33	White sink undercoat	PLM	
34	72-14-12-34	New drywall	PLM	
35	72-14-12-35	New drywall	PLM	
36	72-14-12-36	New drywall	PLM	
37	72-14-13-37	New joint compound	PLM	
38	72-14-13-38	New joint compound	PLM	
39	72-14-13-39	New joint compound	PLM	
40	72-14-14-40	Tape seam on new DW	PLM	

21-40 of 114

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016

Received by: [signature] Date/Time: 11/17/16 11:00 am

Relinquished by: _____ Date/Time: _____

Received by: _____ Date/Time: _____

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-519

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Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-519-41	72-14-14-41	Tape seam on new DW	PLM	
42	72-14-14-42	Tape seam on new DW	PLM	
43	72-11-15-43	Tan w/gray streaks 9x9 FT-black mastic	PLM	
44	72-11-15-44	Tan w/gray streaks 9x9 FT-black mastic	PLM	
45	72-11-15-45	Tan w/gray streaks 9x9 FT-black mastic	PLM	
46	72-11-16-46	White 2'x4' Lg. fissure/small fissure CT	PLM	
47	72-11-16-47	White 2'x4' Lg. fissure/small fissure CT	PLM	
48	72-11-16-48	White 2'x4' Lg. fissure/small fissure CT	PLM	
49	72-11-17-49	White 12x12 Rough Text. CT/black glue/Plas	PLM	
50	72-11-17-50	White 12x12 Rough Text. CT/black glue/Plas	PLM	
51	72-11-17-51	White 12x12 Rough Text. CT/black glue/Plas	PLM	
52	72-11-18-52	Gray floor filler	PLM	
53	72-11-18-53	Gray floor filler	PLM	
54	72-11-18-54	Gray floor filler	PLM	
55	72-11-19-55	Brown glue	PLM	
56	72-11-19-56	Brown glue	PLM	
57	72-11-19-57	Brown glue	PLM	
58	72-14-20-58	Yellow carpet mastic	PLM	
59	72-14-20-59	Yellow carpet mastic	PLM	
60	72-14-20-60	Yellow carpet mastic	PLM	

41-60 of 114

Total Number of Samples: 20 Sample Condition (Accept/Reject): Accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

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Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016
Received by: [signature] Date/Time: 11/17/16 11:00am
Relinquished by: _____ Date/Time: _____
Received by: _____ Date/Time: _____

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Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-519-61	72-7-21-61	Gray floor leveler	PLM	
62	72-7-21-62	Gray floor leveler	PLM	
63	72-7-21-63	Gray floor leveler	PLM	
64	72-3-22-64	White 12x12 w/gray speck FT-yellow mastic	PLM	
65	72-3-22-65	White 12x12 w/gray speck FT-yellow mastic	PLM	
66	72-3-22-66	White 12x12 w/gray speck FT-yellow mastic	PLM	
67	72-3-23-67	Green carpet mastic	PLM	
68	72-3-23-68	Green carpet mastic	PLM	
69	72-3-23-69	Green carpet mastic	PLM	
70	72-3-24-70	Navy 12x12 FT-yellow mastic	PLM	
71	72-3-24-71	Navy 12x12 FT-yellow mastic	PLM	
72	72-3-24-72	Navy 12x12 FT-yellow mastic	PLM	
73	72-3-25-73	Light blue 12x12 FT-yellow mastic	PLM	
74	72-3-25-74	Light blue 12x12 FT-yellow mastic	PLM	
75	72-3-25-75	Light blue 12x12 FT-yellow mastic	PLM	
76	72-2-26-76	Gray w/gray streak 12x12 FT-yellow mastic	PLM	
77	72-2-26-77	Gray w/gray streak 12x12 FT-yellow mastic	PLM	
78	72-2-26-78	Gray w/gray streak 12x12 FT-yellow mastic	PLM	
79	72-2-27-79	Blue w/blue streaks 12x12 FT-yellow mastic	PLM	
80	72-2-27-80	Blue w/blue streaks 12x12 FT-yellow mastic	PLM	

61-80 of 114

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016
Received by: M Dustman Date/Time: 11/17/16 11:00am
Relinquished by: Date/Time:
Received by: Date/Time:

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Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-519-81	72-2-27-81	Blue w/blue streaks 12x12 FT-yellow mastic	PLM	
82	72-2-28-8382	Yellow glue	PLM	
83	72-2-28-8483	Yellow glue	PLM	
84	72-2-28-8584	Yellow glue	PLM	
85	72-1-29-85	White w/black streak 12x12 FT-yellow mast.	PLM	
86	72-1-29-86	White w/black streak 12x12 FT-yellow mast.	PLM	
87	72-1-29-87	White w/black streak 12x12 FT-yellow mast.	PLM	
88	72-1-30-88	Black 12x12 FT-yellow mastic	PLM	
89	72-1-30-89	Black 12x12 FT-yellow mastic	PLM	
90	72-1-30-90	Black 12x12 FT-yellow mastic	PLM	
91	72-1-31-91	Wall texture	PLM	
92	72-1-31-92	Wall texture	PLM	
93	72-1-31-93	Wall texture	PLM	
94	72-1-32-94	Yellow glue	PLM	
95	72-1-32-95	Yellow glue	PLM	
96	72-1-32-96	Yellow glue	PLM	
97	72-1-33-97	Brown cove base w/tan mastic	PLM	
98	72-1-33-98	Brown cove base w/tan mastic	PLM	
99	72-1-33-99	Brown cove base w/tan mastic	PLM	
100	72-1-34-100	Gray cove base with white mastic	PLM	

81-100 of 114

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016

Received by: Date/Time: 11/17/16 11:00am

Relinquished by: Date/Time:

Received by: Date/Time:

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-S19

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/14/2016-11/15/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-S19-101	72-1-34-101	Gray cove base with white mastic	PLM	
102	72-1-34-102	Gray cove base with white mastic	PLM	
103	72-1-35-103	White 2x4 pinhole/pot mark CT	PLM	
104	72-1-35-104	White 2x4 pinhole/pot mark CT	PLM	
105	72-1-35-105	White 2x4 pinhole/pot mark CT	PLM	
106	72-1-36-106	White 2x4 pinhole/large fissure CT	PLM	
107	72-1-36-107	White 2x4 pinhole/large fissure CT	PLM	
108	72-1-36-108	White 2x4 pinhole/large fissure CT	PLM	
109	72-1-37-109	Black floor mastic	PLM	
110	72-1-37-110	Black floor mastic	PLM	
111	72-1-37-111	Black floor mastic	PLM	
112	72-1-38-112	White 2x4 drywall w/vinyl cover CT	PLM	
113	72-1-38-113	White 2x4 drywall w/vinyl cover CT	PLM	
114	72-1-38-114	White 2x4 drywall w/vinyl cover CT	PLM	

101-114 of 114

Total Number of Samples: 14 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/15/2016
Received by: Date/Time: 11/17/16 11:00am
Relinquished by: Date/Time:
Received by: Date/Time:

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11/18/2016

Family Environmental, K.C.
600 East 8th Street, Suite B
Kansas City, MO 64106

Re: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)
PLM16-524

Mr. Dustman,
Attached are the results of Polarized Light Microscopic (PLM) analysis for asbestos contained in the bulk sample materials submitted to this facility on 11/18/2016

Bulk samples are analyzed in accordance with USEPA test method EPA/600/M4-82-020 and EPA/600/R-93/116, which requires that distinctly different materials or layers present within a sample be analyzed and reported separately. (For measurement uncertainty, refer to table 2.1 in EPA/600/R-93/116 method.) Sometimes it is not possible to completely separate thin or strongly adhering layers, such as paint or adhesive, and a combined result is given. For some complex materials, such as drywall/tape/mud joints, a composite or overall asbestos content may be reported in addition to individual layer results. RNET, Inc. is currently accredited for bulk asbestos analysis by the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST). Our NVLAP laboratory code number is 200448-0.

Due to the limitations of the EPA 600 Method, nonfriable organically bound materials (NOBs) such as floor tiles can be difficult to analyze via PLM. EPA recommends that all NOBs reported as non-detect by PLM analysis be further analyzed by Transmission Electron Microscopy for more definitive results. Please note that the PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation.

The analytical results provided in this report apply only to the samples submitted to the laboratory. This report is confidential. Details of this report will not be discussed with any person or agency not associated with you or your organization. This report must be reproduced in its entirety and shall not be copied in part or used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples will be held for a minimum of sixty days unless longer storage is requested. If you have any questions regarding the content of this report please call RNET, Inc. at 303-296-6022.

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NVLAP
NVLAP Lab Code 200448-0

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-01						
72-1-39-115	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-02						
72-1-39-116	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-03						
72-1-39-117	Mud with Paint, White, Off White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-524-04						
72-1-40-118	LAYER 1 Mastic, Yellow, Non-homogeneous, Resinous	LAYER 1 30%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Compound, White, Homogeneous, Fine Grained	LAYER 2 70%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-05						
72-1-40-119	LAYER 1 Mastic, Yellow, Non-homogeneous, Resinous	LAYER 1 30%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Compound, White, Homogeneous, Fine Grained	LAYER 2 70%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-06						
72-1-40-120	LAYER 1 Mastic, Yellow, Non-homogeneous, Resinous	LAYER 1 30%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Compound, White, Homogeneous, Fine Grained	LAYER 2 70%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-07						
72-1-41-121	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 85%	None Detected		Cellulose Fiber Other Non-Fibrous Material	15% 85%
	LAYER 2 Mud with Paint, White and Blue, Homogeneous, Fine Grained	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 3 10%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-08						
72-1-41-122	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	10% 90%
	LAYER 2 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-09						
72-1-41-123	LAYER 1 Drywall, White and Brown, Homogeneous, Fine Grained/Fibrous	LAYER 1 90%	None Detected		Cellulose Fiber Other Non-Fibrous Material	10% 90%
	LAYER 2 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-10						
72-1-42-124	LAYER 1 Tape, Cream, Homogeneous, Fibrous	LAYER 1 95%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-11						
72-1-42-125	LAYER 1 Tape, Cream, Homogeneous, Fibrous	LAYER 1 95%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-12						
72-1-42-126	LAYER 1 Tape, Cream, Homogeneous, Fibrous	LAYER 1 95%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 2 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-13						
72-1-43-127	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-14						
72-1-43-128	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-15						
72-1-43-129	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-16						
72-1-44-130	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Off White, Homogeneous, Hard	LAYER 2 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-17						
72-1-44-131	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Off White, Homogeneous, Hard	LAYER 2 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-18						
72-1-44-132	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Off White, Homogeneous, Hard	LAYER 2 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-19						
72-1-45-133	LAYER 1 Mastic, Yellow and Brown, Non-homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Brown, Homogeneous, Hard	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-20						
72-1-45-134	LAYER 1 Mastic, Yellow and Brown, Non-homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Brown, Homogeneous, Hard	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-21						
72-1-45-135	LAYER 1 Mastic, Yellow and Brown, Non-homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Brown, Homogeneous, Hard	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-22						
72-1-46-136	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Synthetic Fiber Other Non-Fibrous Material	1% 1% 98%
PLM16-524-23						
72-1-46-137	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Synthetic Fiber Other Non-Fibrous Material	1% 1% 98%
PLM16-524-24						
72-1-46-138	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Synthetic Fiber Other Non-Fibrous Material	1% 1% 98%
PLM16-524-25						
72-1-47-139	LAYER 1 Mud with Paint, White, Tan and Red, Non-homogeneous, Fine Grained	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Baseboard, Brown, Homogeneous, Rubbery	LAYER 3 85%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-26						
72-1-47-140	LAYER 1 Mud with Paint, White, Tan and Red, Non-homogeneous, Fine Grained	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Baseboard, Brown, Homogeneous, Rubbery	LAYER 3 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-27						
72-1-47-141	LAYER 1 Mud with Paint, White, Tan and Red, Non-homogeneous, Fine Grained	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Baseboard, Brown, Homogeneous, Rubbery	LAYER 3 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-28						
72-1-48-142	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-29						
72-1-48-143	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-30						
72-1-48-144	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 10%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-31						
72-1-49-145	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 2% 38%
PLM16-524-32						
72-1-49-146	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 2% 38%
PLM16-524-33						
72-1-49-147	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 2% 38%
PLM16-524-34						
72-1-50-148	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Blue, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-35						
72-1-50-149	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Blue, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-36						
72-1-50-150	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Blue, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-37						
72-1-51-151	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-38						
72-1-51-152	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-39						
72-1-51-153	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-40						
72-1-52-154	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-41						
72-1-52-155	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-42						
72-1-52-156	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-43						
72-1-53-157	Vinyl Tread, Black, Homogeneous, Rubbery	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-44						
72-1-53-158	Vinyl Tread, Black, Homogeneous, Rubbery	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-45						
72-1-53-159	Vinyl Tread, Black, Homogeneous, Rubbery	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-46						
72-1-54-160	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Blue, Homogeneous, Hard	LAYER 2 95%	None Detected		Other Non-Fibrous	100%
PLM16-524-47						
72-1-54-161	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Blue, Homogeneous, Hard	LAYER 2 95%	None Detected		Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-48						
72-1-54-162	LAYER 1 Mastic, Yellow, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Floor Tile, Blue, Homogeneous, Hard	LAYER 2 95%	None Detected		Other Non-Fibrous	100%
PLM16-524-49						
72-1-55-163	Duct Glue, Tan, Homogeneous, Resinous	LAYER 1 100%	None Detected		Synthetic Fiber Other Non-Fibrous	5% 95%
PLM16-524-50						
72-1-55-164	Duct Glue, Tan, Homogeneous, Resinous	LAYER 1 100%	None Detected		Synthetic Fiber Other Non-Fibrous	5% 95%
PLM16-524-51						
72-1-55-165	Duct Glue, Tan, Homogeneous, Resinous	LAYER 1 100%	None Detected		Synthetic Fiber Other Non-Fibrous	5% 95%
PLM16-524-52						
72-B-56-166	LAYER 1 Paper, Brown, Homogeneous, Fibrous	LAYER 1 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-53						
72-B-56-167	LAYER 1 Paper, Brown, Homogeneous, Fibrous	LAYER 1 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-54						
72-B-56-168	LAYER 1 Paper, Brown, Homogeneous, Fibrous	LAYER 1 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mastic, Yellow, Homogeneous, Resinous	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-55						
72-B-57-169	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Mastic, Clear, Homogeneous, Resinous	LAYER 3 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-56						
72-B-57-170	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Mastic, Clear, Homogeneous, Resinous	LAYER 3 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-57						
72-B-57-171	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 80%	None Detected		Other Non-Fibrous Material	100%
	LAYER 3 Mastic, Clear, Homogeneous, Resinous	LAYER 3 5%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-58						
72-B-58-172	LAYER 1 Paper, Brown, Non-homogeneous, Fibrous	LAYER 1 50%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
	LAYER 2 Mastic, Black, Non-homogeneous, Resinous	LAYER 2 50%	Chrysotile	4%	Other Non-Fibrous Material	96%
PLM16-524-59						
72-B-58-173	Not Analyzed-First Positive Stop					

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-60 72-B-58-174	Not Analyzed-First Positive Stop					
PLM16-524-61 72-B-59-175	Mastic, Brown, Homogeneous, Resinous	LAYER 1 100%	Chrysotile	15%	Other Non-Fibrous	85%
PLM16-524-62 72-B-59-176	Not Analyzed-First Positive Stop					
PLM16-524-63 72-B-59-177	Not Analyzed-First Positive Stop					
PLM16-524-64 72-B-60-178	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 10%	Chrysotile	5%	Other Non-Fibrous Material	95%
	LAYER 2 Floor Tile, Brown, Homogeneous, Hard	LAYER 2 90%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-65 72-B-60-179	Not Analyzed-First Positive Stop					
PLM16-524-66 72-B-60-180	Not Analyzed-First Positive Stop					
PLM16-524-67 72-B-61-181	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 5%	Chrysotile	8%	Other Non-Fibrous Material	92%
	LAYER 2 Floor Tile, Off White, Homogeneous, Hard	LAYER 2 95%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-68 72-B-61-182	Not Analyzed-First Positive Stop					
PLM16-524-69 72-B-61-183	Not Analyzed-First Positive Stop					

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-70						
72-B-62-184	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 95%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-71						
72-B-62-185	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 95%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-72						
72-B-62-186	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 5%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Baseboard, Black, Homogeneous, Rubbery	LAYER 2 95%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-73						
72-B-63-187	Surfacing Material with Paint, Gray and Off White, Non-homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-74						
72-B-63-188	Surfacing Material with Paint, Gray and Off White, Non-homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-75						
72-B-63-189	Surfacing Material with Paint, Gray and Off White, Non-homogeneous, Coarse Grained	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-76						
72-B-64-190	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 2 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-77						
72-B-64-191	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 2 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
PLM16-524-78						
72-B-64-192	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 20%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 2 80%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
PLM16-524-79						
72-B-65-193	Mastic, Yellow and Black, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-80						
72-B-65-194	Mastic, Yellow and Black, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-81						
72-B-65-195	Mastic, Yellow and Black, Homogeneous, Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-82						
72-B-66-196	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 10%	Chrysotile	3%	Other Non-Fibrous Material	97%
	LAYER 2 Floor Tile, Tan, Homogeneous, Hard	LAYER 2 90%	None Detected		Other Non-Fibrous	100%
PLM16-524-83						
72-B-66-197	Not Analyzed-First Positive Stop					
PLM16-524-84						
72-B-66-198	Not Analyzed-First Positive Stop					

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-85						
72-B-67-199	LAYER 1 Mastic, Yellow and Black, Non-homogeneous, Resinous	LAYER 1 15%	Chrysotile	3%	Other Non-Fibrous Material	97%
	LAYER 2 Floor Tile, Tan, Homogeneous, Hard	LAYER 2 85%	None Detected		Other Non-Fibrous	100%
PLM16-524-86						
72-B-67-200	Not Analyzed-First Positive Stop					
PLM16-524-87						
72-B-67-201	Not Analyzed-First Positive Stop					
PLM16-524-88						
72-B-68-202	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-89						
72-B-68-203	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-90						
72-B-68-204	Mud with Paint, White and Tan, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-91						
72-B-69-205	Leveler, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-92						
72-B-69-206	Leveler, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-93						
72-B-69-207	Leveler, White, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-94						
72-B-70-208	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	10% 90%
PLM16-524-95						
72-B-70-209	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	10% 90%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-96						
72-B-70-210	Mastic, Yellow, Homogeneous, Resinous	LAYER 1 100%	None Detected		Cellulose Fiber Other Non-Fibrous	10% 90%
PLM16-524-97						
72-B-71-211	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 30% 10%
PLM16-524-98						
72-B-71-212	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 30% 10%
PLM16-524-99						
72-B-71-213	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	60% 30% 10%
PLM16-524-100						
72-B-72-214	Mastic, Black, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-101						
72-B-72-215	Mastic, Black, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-102						
72-B-72-216	Mastic, Black, Homogeneous, Fine Grained	LAYER 1 100%	None Detected		Other Non-Fibrous	100%
PLM16-524-103						
72-B-73-217	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 15%	Chrysotile	8%	Other Non-Fibrous Material	92%
	LAYER 2 Floor Tile, Gray, Homogeneous, Hard	LAYER 2 85%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-104						
72-B-73-218	Not Analyzed-First Positive Stop					
PLM16-524-105						
72-B-73-219	Not Analyzed-First Positive Stop					

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-106						
72-B-74-220	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
PLM16-524-107						
72-B-74-221	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
PLM16-524-108						
72-B-74-222	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, Brown, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Cellulose Fiber Other Non-Fibrous Material	98% 2%
PLM16-524-109						
72-B-75-223	Floor Covering, Green, Homogeneous, Coarse Grained/Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-110						
72-B-75-224	Floor Covering, Green, Homogeneous, Coarse Grained/Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-111						
72-B-75-225	Floor Covering, Green, Homogeneous, Coarse Grained/Resinous	LAYER 1 100%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-112						
72-B-76-226	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-524-113						
72-B-76-227	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-114						
72-B-76-228	Mud with Paint, White, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-524-115						
72-B-77-229	Mud with Paint, White, Off White, and Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	Trace	Other Non-Fibrous	100%
PLM16-524-116						
72-B-77-230	Mud with Paint, White, Off White, and Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	2%	Other Non-Fibrous	98%
PLM16-524-117						
72-B-77-231	Mud with Paint, White, Off White, and Tan, Homogeneous, Fine Grained	LAYER 1 100%	Chrysotile	2%	Other Non-Fibrous	98%
PLM16-524-118						
72-SB-78-232	LAYER 1 Mastic, Black, Homogeneous, Resinous	LAYER 1 15%	Chrysotile	8%	Other Non-Fibrous Material	92%
	LAYER 2 Floor Tile, Gray, Homogeneous, Hard	LAYER 2 85%	Chrysotile	5%	Other Non-Fibrous Material	95%
PLM16-524-119						
72-SB-78-233	Not Analyzed-First Positive Stop					
PLM16-524-120						
72-SB-78-234	Not Analyzed-First Positive Stop					
PLM16-524-121						
72-SB-79-235	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, White, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Fibrous Glass Other Non-Fibrous Material	95% 5%
PLM16-524-122						
72-SB-79-236	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, White, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Fibrous Glass Other Non-Fibrous Material	95% 5%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-123						
72-SB-79-237	LAYER 1 Mastic, Brown, Homogeneous, Resinous	LAYER 1 15%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Ceiling Tile, White, Homogeneous, Fibrous	LAYER 2 85%	None Detected		Fibrous Glass Other Non-Fibrous Material	95% 5%
PLM16-524-124						
72-SB-80-238	Vermiculite Insulation, Gold, Non-homogeneous, Flaky	LAYER 1 100%	Tremolite Actinolite	Trace Trace	Vermiculite	100%
	Unable to differentiate Tremolite/Actinolite.					
PLM16-524-125						
72-SB-80-239	Vermiculite Insulation, Gold, Non-homogeneous, Flaky	LAYER 1 100%	Tremolite Actinolite	Trace Trace	Vermiculite	100%
	Unable to differentiate Tremolite/Actinolite.					
PLM16-524-126						
72-SB-80-240	Vermiculite Insulation, Gold, Non-homogeneous, Flaky	LAYER 1 100%	Tremolite Actinolite	Trace Trace	Vermiculite	100%
	Unable to differentiate Tremolite/Actinolite.					
PLM16-524-127						
72-SB-81-241	Mastic, Black, Homogeneous, Resinous	LAYER 1 100%	Chrysotile	10%	Other Non-Fibrous	90%
PLM16-524-128						
72-SB-81-242	Not Analyzed-First Positive Stop					
PLM16-524-129						
72-SB-81-243	Not Analyzed-First Positive Stop					
PLM16-524-130						
72-SB-82-244	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-131						
72-SB-82-245	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-132 72-SB-82-246	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-133 72-SB-83-247	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-134 72-SB-83-248	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-135 72-SB-83-249	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-136 72-SB-84-250	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-137 72-SB-84-251	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-138 72-SB-84-252	Ceiling Tile, Brown and White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous Material	40% 40% 20%
PLM16-524-139 72-SB-85-253	LAYER 1 Block Filler, Off White, Non-homogeneous, Coarse Grained	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mud, Off White, Non-homogeneous, Fine Grained	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-524-140						
72-SB-85-254	LAYER 1 Block Filler, Off White, Non-homogeneous, Coarse Grained	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mud, Off White, Non-homogeneous, Fine Grained	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-141						
72-SB-85-255	LAYER 1 Block Filler, Off White, Non-homogeneous, Coarse Grained	LAYER 1 50%	None Detected		Other Non-Fibrous Material	100%
	LAYER 2 Mud, Off White, Non-homogeneous, Fine Grained	LAYER 2 50%	None Detected		Other Non-Fibrous Material	100%
PLM16-524-142						
72-SB-86-256	LAYER 1 Sealant, Off White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous	10% 10% 80%
	LAYER 2 Insulation, Yellow, Homogeneous, Fibrous	LAYER 2 50%	None Detected		Fibrous Glass Other Non-Fibrous Material	98% 2%
PLM16-524-143						
72-SB-86-257	LAYER 1 Sealant, Off White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous	10% 10% 80%
	LAYER 2 Insulation, Yellow, Homogeneous, Fibrous	LAYER 2 50%	None Detected		Fibrous Glass Other Non-Fibrous Material	98% 2%
PLM16-524-144						
72-SB-86-258	LAYER 1 Sealant, Off White, Non-homogeneous, Resinous	LAYER 1 50%	None Detected		Cellulose Fiber Fibrous Glass Other Non-Fibrous	10% 10% 80%
	LAYER 2 Insulation, Yellow, Homogeneous, Fibrous	LAYER 2 50%	None Detected		Fibrous Glass Other Non-Fibrous Material	98% 2%

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-524

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)

ADDITIONAL COMMENTS: All separable parts or layers (except paint) within the same sample are analyzed and reported individually. Composite asbestos percent is reported, if applicable, by visual estimation.

ND = None Detected TR = Trace, less than 1.0%

Analyst: Marissa Urdiales

Date: 11/26/2016

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-524

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-01	72-1-39-115	White wall texture	PLM	
02	72-1-39-116	White wall texture	PLM	
03	72-1-39-117	White wall texture	PLM	
04	72-1-40-118	Yellow carpet mastic	PLM	
05	72-1-40-119	Yellow carpet mastic	PLM	
06	72-1-40-120	Yellow carpet mastic	PLM	
07	72-1-41-121	Tan painted texture with drywall	PLM	
08	72-1-41-122	Tan painted texture with drywall	PLM	
09	72-1-41-123	Tan painted texture with drywall	PLM	
10	72-1-42-124	Green/White joint tape	PLM	
11	72-1-42-125	Green/White joint tape	PLM	
12	72-1-42-126	Green/White joint tape	PLM	
13	72-1-43-127	White wall texture	PLM	
14	72-1-43-128	White wall texture	PLM	
15	72-1-43-129	White wall texture	PLM	
16	72-1-44-130	Off white w/gray speck 12x12 FT-yellow mastic	PLM	
17	72-1-44-131	Off white w/gray speck 12x12 FT-yellow mastic	PLM	
18	72-1-44-132	Off white w/gray speck 12x12 FT-yellow mastic	PLM	
19	72-1-45-133	Brown-brown speck 12x12 FT-yellow mastic	PLM	
20	72-1-45-134	Brown-brown speck 12x12 FT-yellow mastic	PLM	

Total Number of Samples: 1 - 20 of 144 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/16/2016

Received by: [signature] Date/Time: 11/18/16 9:30 am

Relinquished by: _____ Date/Time: _____

Received by: _____ Date/Time: _____

PLM16-524

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Client: Family Environmental, KC

Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929

Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-21	72-1-45-135	Brown-brown speck 12x12 FT-yellow mastic	PLM	
22	72-1-46-136	Yellow carpet mastic	PLM	
23	72-1-46-137	Yellow carpet mastic	PLM	
24	72-1-46-138	Yellow carpet mastic	PLM	
25	72-1-47-139	Brown 4" cove base with tan mastic	PLM	
26	72-1-47-140	Brown 4" cove base with tan mastic	PLM	
27	72-1-47-141	Brown 4" cove base with tan mastic	PLM	
28	72-1-48-142	Black 4" cove base with yellow mastic	PLM	
29	72-1-48-143	Black 4" cove base with yellow mastic	PLM	
30	72-1-48-144	Black 4" cove base with yellow mastic	PLM	
31	72-1-49-145	White 2'x4' pinhole/potmark CT	PLM	
32	72-1-49-146	White 2'x4' pinhole/potmark CT	PLM	
33	72-1-49-147	White 2'x4' pinhole/potmark CT	PLM	
34	72-1-50-148	Navy blue 4" cove base w/yellow mastic	PLM	
35	72-1-50-149	Navy blue 4" cove base w/yellow mastic	PLM	
36	72-1-50-150	Navy blue 4" cove base w/yellow mastic	PLM	
37	72-1-51-151	White wall texture	PLM	
38	72-1-51-152	White wall texture	PLM	
39	72-1-51-153	White wall texture	PLM	
40	72-1-52-154	Yellow carpet mastic	PLM	

Total Number of Samples: 20 (21-40 of 144)

Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx — Date/Time: 11/16/2016
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Relinquished by: — Date/Time:
Received by: — Date/Time:

RNET

River North Environmental Testing, Inc.
3650 Chestnut Place • Denver, CO 80216
Ph: 303-297-0079 • Fax: 303-292-1451
www.rnetesting.com • info@rnetesting.com

Client: Family Environmental, KC
Contact: Mike Dustman
Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929
Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016
Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)
Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-S24-41	72-1-52-155	yellow carpet mastic	PLM	
42	72-1-52-156	yellow carpet mastic	PLM	
43	72-1-53-157	Black vinyl tread w/no mastic	PLM	
44	72-1-53-158	Black vinyl tread w/no mastic	PLM	
45	72-1-53-159	Black vinyl tread w/no mastic	PLM	
46	72-1-54-160	Blue w/blue specks 12x12 FT-yellow mastic	PLM	
47	72-1-54-161	Blue w/blue specks 12x12 FT-yellow mastic	PLM	
48	72-1-54-162	Blue w/blue specks 12x12 FT-yellow mastic	PLM	
49	72-1-55-163	Tan duct glue	PLM	
50	72-1-55-164	Tan duct glue	PLM	
51	72-1-55-165	Tan duct glue	PLM	
52	72-B-56-166	Yellow glue	PLM	
53	72-B-56-167	Yellow glue	PLM	
54	72-B-56-168	Yellow glue	PLM	
55	72-B-57-169	Brown 4" cove base with brown mastic	PLM	
56	72-B-57-170	Brown 4" cove base with brown mastic	PLM	
57	72-B-57-171	Brown 4" cove base with brown mastic	PLM	
58	72-B-58-172	Black glue	PLM	
59	72-B-58-173	Black glue	PLM	
60	72-B-58-174	Black glue	PLM	

Total Number of Samples: 20 (41-60 of 144)
Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx — Date/Time: 11/16/2016
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Relinquished by: — Date/Time:
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PLM16-524

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Client: Family Environmental, KC

Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929

Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: *First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)*

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-61	72-B-59-175	Brown glue	PLM	
62	72-B-59-176	Brown glue	PLM	
63	72-B-59-177	Brown glue	PLM	
64	72-B-60-178	Brown 12x12 FT-black mastic	PLM	
65	72-B-60-179	Brown 12x12 FT-black mastic	PLM	
66	72-B-60-180	Brown 12x12 FT-black mastic	PLM	
67	72-B-61-181	Off white 12x12 FT-black mastic	PLM	
68	72-B-61-182	Off white 12x12 FT-black mastic	PLM	
69	72-B-61-183	Off white 12x12 FT-black mastic	PLM	
70	72-B-62-184	2" black cove base w/ brown mastic	PLM	
71	72-B-62-185	2" black cove base w/ brown mastic	PLM	
72	72-B-62-186	2" black cove base w/ brown mastic	PLM	
73	72-B-63-187	White sandy texture surfacing material	PLM	
74	72-B-63-188	White sandy texture surfacing material	PLM	
75	72-B-63-189	White sandy texture surfacing material	PLM	
76	72-B-64-190	White 12x12 pencil hole CT/brown glue dot	PLM	
77	72-B-64-191	White 12x12 pencil hole CT/brown glue dot	PLM	
78	72-B-64-192	White 12x12 pencil hole CT/brown glue dot	PLM	
79	72-B-65-193	Yellow carpet mastic	PLM	
80	72-B-65-194	Yellow carpet mastic	PLM	

61-80 of 144

Total Number of Samples: 20

Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx — Date/Time: 11/16/2016
Received by: [signature] — Date/Time: 11/18/16 9:30am
Relinquished by: — Date/Time:
Received by: — Date/Time:

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PLM16-524

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-81	72-B-65-195	Yellow carpet mastic	PLM	
82	72-B-66-196	Tan w/red streaks 12x12 FT-black mastic	PLM	
83	72-B-66-197	Tan w/red streaks 12x12 FT-black mastic	PLM	
84	72-B-66-198	Tan w/red streaks 12x12 FT-black mastic	PLM	
85	72-B-67-199	Tan w/tan streaks 12x12 FT-black mastic	PLM	
86	72-B-67-200	Tan w/tan streaks 12x12 FT-black mastic	PLM	
87	72-B-67-201	Tan w/tan streaks 12x12 FT-black mastic	PLM	
88	72-B-68-202	Tan painted wall texture	PLM	
89	72-B-68-203	Tan painted wall texture	PLM	
90	72-B-68-204	Tan painted wall texture	PLM	
91	72-B-69-205	White floor leveler	PLM	
92	72-B-69-206	White floor leveler	PLM	
93	72-B-69-207	White floor leveler	PLM	
94	72-B-70-208	Yellow carpet mastic	PLM	
95	72-B-70-209	Yellow carpet mastic	PLM	
96	72-B-70-210	Yellow carpet mastic	PLM	
97	72-B-71-211	White 2'x4' pinhole/pot mark CT	PLM	
98	72-B-71-212	White 2'x4' pinhole/pot mark CT	PLM	
99	72-B-71-213	White 2'x4' pinhole/pot mark CT	PLM	
100	72-B-72-214	Black mirror mastic	PLM	

81-100 of 144

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

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Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/16/2016
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PLM16-524

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Client: Family Environmental, KC
Contact: Mike Dustman
Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929
Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016
Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)
Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-101	72-B-72-215	Black mirror mastic	PLM	
102	72-B-72-216	Black mirror mastic	PLM	
103	72-B-73-217	Gray 12x12 FT-black mastic	PLM	
104	72-B-73-218	Gray 12x12 FT-black mastic	PLM	
105	72-B-73-219	Gray 12x12 FT-black mastic	PLM	
106	72-B-74-220	Tan painted 12x12 CT/brown glue dot	PLM	
107	72-B-74-221	Tan painted 12x12 CT/brown glue dot	PLM	
108	72-B-74-222	Tan painted 12x12 CT/brown glue dot	PLM	
109	72-B-75-223	Green floor covering	PLM	
110	72-B-75-224	Green floor covering	PLM	
111	72-B-75-225	Green floor covering	PLM	
112	72-B-76-226	White wall texture	PLM	
113	72-B-76-227	White wall texture	PLM	
114	72-B-76-228	White wall texture	PLM	
115	72-B-77-229	White ceiling texture	PLM	
116	72-B-77-230	White ceiling texture	PLM	
117	72-B-77-231	White ceiling texture	PLM	
118	72-SB-78-232	Gray/ white streaks 12x12 FT-black mastic	PLM	
119	72-SB-78-233	Gray/ white streaks 12x12 FT-black mastic	PLM	
120	72-SB-78-234	Gray/ white streaks 12x12 FT-black mastic	PLM	

Total Number of Samples: 20 (101-120 of 144)
Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx — Date/Time: 11/16/2016
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Relinquished by: — Date/Time:
Received by: — Date/Time:

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-121	72-SB-79-235	White 12x12 pinhole/sm. fiss. CT-brown glue	PLM	
122	72-SB-79-236	White 12x12 pinhole/sm. fiss. CT-brown glue	PLM	
123	72-SB-79-237	White 12x12 pinhole/sm. fiss. CT-brown glue	PLM	
124	72-SB-80-238	Virmiculite wall insulation	PLM	
125	72-SB-80-239	Virmiculite wall insulation	PLM	
126	72-SB-80-240	Virmiculite wall insulation	PLM	
127	72-SB-81-241	Balck mastic	PLM	
128	72-SB-81-242	Balck mastic	PLM	
129	72-SB-81-243	Balck mastic	PLM	
130	72-SB-82-244	White 2'x4' pinhole CT	PLM	
131	72-SB-82-245	White 2'x4' pinhole CT	PLM	
132	72-SB-82-246	White 2'x4' pinhole CT	PLM	
133	72-SB-83-247	White 2'x4' pinhole/long fissure CT	PLM	
134	72-SB-83-248	White 2'x4' pinhole/long fissure CT	PLM	
135	72-SB-83-249	White 2'x4' pinhole/long fissure CT	PLM	
136	72-SB-84-250	White 2'x4' small hole CT	PLM	
137	72-SB-84-251	White 2'x4' small hole CT	PLM	
138	72-SB-84-252	White 2'x4' small hole CT	PLM	
139	72-SB-85-253	White CMU block filler	PLM	
140	72-SB-85-254	White CMU block filler	PLM	

121-140 of 144

Total Number of Samples: 20 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

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Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/16/2016
Received by: M Underhill Date/Time: 11/18/16 9:30a.
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Received by: Date/Time:

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Effective Date: 10/17/2013

PLM16-524

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Client: Family Environmental, KC

Contact: Mike Dustman

Address: 600 East 8th Street, Suite B
Kansas City, Missouri 64106

Phone #: (816) 935-2929

Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/16/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-524-141	72-SB-85-255	White CMU block filler	PLM	
142	72-SB-86-256	White CP-11 sealant on fiberglass joint	PLM	
143	72-SB-86-257	White CP-11 sealant on fiberglass joint	PLM	
144	72-SB-86-258	White CP-11 sealant on fiberglass joint	PLM	

Total Number of Samples: 4 141-144 of 144

Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx — Date/Time: 11/16/2016
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Received by: — Date/Time:

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12/2/2016

Family Environmental, K.C.
600 East 8th Street, Suite B
Kansas City, MO 64106

Re: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)
PLM16-536

Mr. Dustman,
Attached are the results of Polarized Light Microscopic (PLM) analysis for asbestos contained in the bulk sample materials submitted to this facility on 12/1/2016

Bulk samples are analyzed in accordance with USEPA test method EPA/600/M4-82-020 and EPA/600/R-93/116, which requires that distinctly different materials or layers present within a sample be analyzed and reported separately. (For measurement uncertainty, refer to table 2.1 in EPA/600/R-93/116 method.) Sometimes it is not possible to completely separate thin or strongly adhering layers, such as paint or adhesive, and a combined result is given. For some complex materials, such as drywall/tape/mud joints, a composite or overall asbestos content may be reported in addition to individual layer results. RNET, Inc. is currently accredited for bulk asbestos analysis by the National Voluntary Laboratory Accreditation Program (NVLAP) of the National Institute of Standards and Technology (NIST). Our NVLAP laboratory code number is 200448-0.

Due to the limitations of the EPA 600 Method, nonfriable organically bound materials (NOBs) such as floor tiles can be difficult to analyze via PLM. EPA recommends that all NOBs reported as non-detect by PLM analysis be further analyzed by Transmission Electron Microscopy for more definitive results. Please note that the PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation.

The analytical results provided in this report apply only to the samples submitted to the laboratory. This report is confidential. Details of this report will not be discussed with any person or agency not associated with you or your organization. This report must be reproduced in its entirety and shall not be copied in part or used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. Samples will be held for a minimum of sixty days unless longer storage is requested. If you have any questions regarding the content of this report please call RNET, Inc. at 303-296-6022.

Marissa Urdiales
Asbestos Analyst
murdiales@familyenvironmental.com
Cell: 719-214-2837

NVLAP Lab Code 200448-0

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REPORT OF TEST RESULTS

PLM Bulk Asbestos Analysis

NVLAP Lab Code 200448-0

CLIENT: Family Environmental Compliance Services

PROJECT: PLM16-536

Lab-ID No. Sample ID	Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
PLM16-536-01 72-1-87-259	Fireproofing, Off White, Non-homogeneous, Semi-Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Vermiculite Other Non-Fibrous	5% 5% 90%
PLM16-536-02 72-1-87-260	Fireproofing, Off White, Non-homogeneous, Semi-Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Vermiculite Other Non-Fibrous	5% 5% 90%
PLM16-536-03 72-1-88-261	Insulation, Off White, Homogeneous, Fibrous	LAYER 1 100%	None Detected		Fibrous Glass Other Non-Fibrous	98% 2%
PLM16-536-04 72-1-89-262	*Fireproofing Overspray, Off White,* Non-homogeneous, Semi-Fibrous	LAYER 1 100%	*Chrysotile*	4%	Vermiculite Other Non-Fibrous	10% 86%

ADDITIONAL COMMENTS: All separable parts or layers (except paint) within the same sample are analyzed and reported individually. Composite asbestos percent is reported, if applicable, by visual estimation.

ND = None Detected TR = Trace, less than 1.0%

Analyst: Marissa Urdiales

Date: 12/02/2016

Document No: FCF-04.00
Effective Date: 10/17/2013

PLM16-536

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Client: Family Environmental, KC Contact: Mike Dustman

Address: 600 East 8th Street, Suite B

Kansas City, Missouri 64106

Phone #: (816) 935-2929 Fax #/Email: mdustman@familyenvironmental.com

Date Sampled: 11/29/2016

Sample Location: First National Center-120 N. Robinson Avenue, Oklahoma City, OK 73102 (1972-East Building)

Special Instructions: Positive Stop Analysis. Family Project Number: 110816-1

Lab ID (for lab use only)	Client ID	Description	Type of Analysis	Volume/Other
PLM16-536-01	72-1-87-259	Fireproofing-feed the children	PLM	
02	72-1-87-260	Fireproofing-feed the children-N. Spandrel	PLM	
03	72-1-88-261	Fireproofing-hall telecom closet	PLM	
04	72-1-89-262	Fireproofing overspray above hall ceiling	PLM	

Total Number of Samples: 4 Sample Condition (Accept/Reject): accept

Requested Turnaround Time: ( ) RUSH *** ( ) Next Day (X) 2 Day

*** RUSH Turnaround times required prior notification. Additional fees may apply. Call lab for more details.

Relinquished by: Michael E. Dustman via FedEx Date/Time: 11/29/2016

Received by: [signature] Date/Time: 12/1/16 14:00

Relinquished by: _____ Date/Time: _____

Received by: _____ Date/Time: _____

APPENDIX E

POSITIVE ACM PHOTOGRAPHIC DOCUMENTATION

Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	1	**Date:**	11/15/2016
Description:	Asbestos-containing joint compound on drywall in elevator penthouse. Samples #4, 7, 8, 9.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	2	**Date:**	11/15/2016
Description:	Asbestos-containing surfacing material on air duct drywall on 14th floor. Samples #13, 14, 15.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	3	**Date:**	11/15/2016
Description:	Asbestos-containing tan 9”x9” floor tile with black mastic on the 11th floor. Samples 43, 44, 45.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	4	**Date:**	11/15/2016
Description:	Asbestos-containing black glue dots on the 11th floor. Samples 49, 50, 51.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	5	**Date:**	11/15/2016
Description:	Asbestos-containing black mastic under gray floor filler on the 11th floor. Samples 52, 53, 54.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

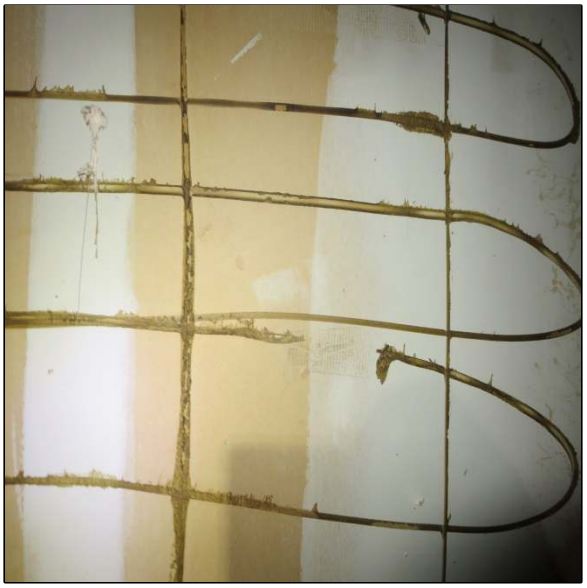
Photograph Number:	6	**Date:**	11/15/2016
Description:	Asbestos-containing brown mastic behind wood paneling on the 11th floor. Samples 55, 56, 57.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	7	**Date:**	11/15/2016
Description:	Asbestos-containing black mastic under gray floor filler on the 7th floor. Samples 61, 62, 63.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	8	**Date:**	11/16/2016
Description:	Asbestos-containing texture on a wall in Feed the Children on the 1st floor. Sample 117.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	9	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic behind wood paneling in the basement. Samples 172, 173, 174.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

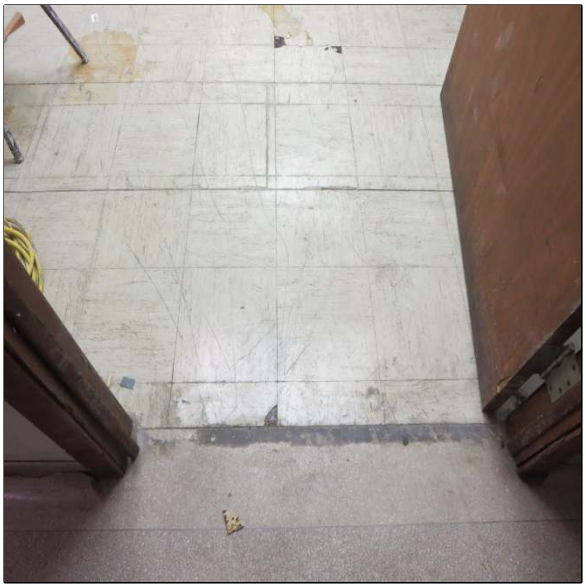


Photograph Number:	10	**Date:**	11/16/2016
Description:	Asbestos-containing brown mastic behind wood paneling in the basement. Samples 175, 176, 177.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	11	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic under brown floor tile in the basement. Samples 178, 179, 180.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	12	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic under off-white floor tile in the basement. Samples 181, 182, 183.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

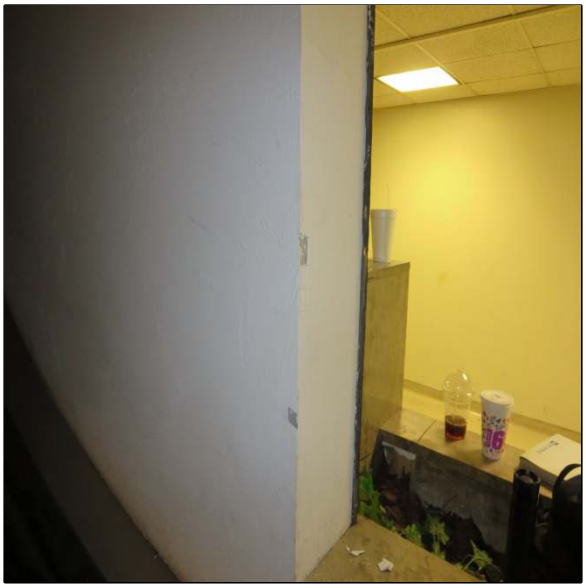
Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102



Photograph Number:	13	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic under tan with red streaked floor tile in the basement. Samples 196, 197, 198.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	14	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic under tan with tan streaked floor tile in the basement. Samples 199, 200, 201.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	15	**Date:**	11/16/2016
Description:	Asbestos-containing black mastic under gray floor tile in the basement. Samples 217, 218, 219.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		



Photograph Number:	16	**Date:**	11/16/2016
Description:	Asbestos-containing texture on a wall by the basement escalator. Samples 226, 227, 228.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	17	**Date:**	11/16/2016
Description:	Asbestos-containing texture on a ceiling by the basement escalator. Samples 229, 230, 231.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	18	**Date:**	11/16/2016
Description:	Asbestos-containing gray floor tile with black mastic in the sub-basement. Samples 232, 233, 234.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	19	**Date:**	11/16/2016
Description:	Asbestos-containing vermiculite insulation in drywall in the sub-basement. Samples 238, 239, 240.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Photograph Number:	20	**Date:**	11/16/2016
Description:	Asbestos-containing black glue dots behind mirror panels in the sub-basement. Samples 241, 242, 243.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

Positive ACM– East Building-1972, 120 N. Robinson Avenue, Oklahoma City, Oklahoma 73102

Photograph Number:	21	**Date:**	11/16/2016
Description:	Asbestos-containing fireproofing on ducting above drop ceiling on the 1st floor in hallway. Sample 262.		
Client:	City of Oklahoma City, OK		
Photographer:	Michael Dustman		

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Photograph Number:		**Date:**	
Description:			
Client:			
Photographer:			

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Photograph Number:		**Date:**	
Description:			
Client:			
Photographer:			

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Asbestos Survey Verification

First National Center
West Building-1931

120 North Robinson Street
Oklahoma City, Oklahoma 73102

Prepared For:
The City of Oklahoma City

420 W Main Street, Suite 920
Oklahoma City, OK 73102

Date Prepared:
January 23, 2017

Prepared By:

Family Environmental
MEM
SCS ENGINEERS

TABLE OF CONTENTS

1.0 INTRODUCTION

SCS Engineers (SCS) was contracted by the City of Oklahoma City, Oklahoma Planning Department to perform an asbestos survey within the First National Center (FNC), 120 North Robinson Avenue, Oklahoma City, Oklahoma (Property). The entire Property consists of three independently built structures: the West Building constructed in 1931, the Center Building constructed in 1957 and the East Building constructed in 1972. The extent of this asbestos survey verification is limited to the West Building.

The FNC West Building is planned for commercial and residential redevelopment. The redevelopment is expected to include demolition and renovation activities. As a part of cleanup planning activities prior to redevelopment, the SCS project team completed an Asbestos Survey Verification of previously completed asbestos surveys. Terracon Consultants, Inc. (Terracon) completed asbestos surveys in May 2014 and June 2016. The overall purpose of the asbestos survey verification was to review previously completed asbestos survey data; identify data gaps in the previously prepared asbestos survey reports; and resolve any identified data gaps via bulk sampling of additional building materials and laboratory analysis prior to the anticipated FNC Center Building demolition/renovation. The survey verification design team consisted of SCS, Family Environmental Compliance Services, Inc. (Family Environmental) and Marshall Environmental Management (Marshall). The FNC West Building survey verification activities were conducted on November 17, 2016 and November 29, 2016. The findings of this survey did confirm and identify additional building materials containing asbestos at the FNC Center Building.

2.0 PREVIOUS ASBESTOS SURVEYS

2.1 Terracon Asbestos Surveys

Two asbestos surveys were completed for the West Building at the FNC Property for prior prospective purchasers. These surveys were completed by Terracon in May 2014 and June 2016 for all three FNC Property buildings. The May 2014 Asbestos Survey, for the West Building, identified the types of asbestos-containing material (ACM) present in the West Building, but did not include building plans, sampling location drawings or photographs of confirmed ACM in the survey report. Table 1 below presents the ACM identified in the May 2014 survey report. The June 2016 survey, of all three buildings, provided additional information on estimated quantities of ACM, general locations of identified ACM, incorporated results and data from the 2014 survey and provided a revised abatement cost estimate. The 2016 Survey document also did not provide building plans, sampling location drawings or photographs of confirmed ACM. Copies of the previous Terracon asbestos surveys are available upon request. However, due to the size of the overall Terracon survey documents, copies were not appended to this report for review.

TABLE 1 – IDENTIFIED ASBESTOS-CONTAINING MATERIALS

Material Description	Material Location
Friable Ceiling Thermal Plaster	Boiler Room Ceiling
Acoustical Ceiling	Vault Safe Deposit Area, 4th Floor southeast. 31st Floor, 31st Floor Attic & 32nd Floor
Brown Mastic Behind 1'x1' Ceiling Tile	Behind 1'x1' Ceiling Tiles Throughout
Duct Paper Tape and fiberglass	13th Floor, 31st Floor, and 31st Floor attic
Piping / Fittings (steam, domestic water, drain)	Throughout building
Transite ®	16th Floor back of elevator room doors, Radiators, Cooling Tower
Tank Insulation	Drinking water Tank 17th and 33rd Floor
Duct Insulation	12th-27th Floors and 31st Floor Attic AHU Rooms, Boiler Duct
Hot Water Tanks (3)	Boiler Room
DA Tank	Boiler Room
Sand Filler Tank	Boiler Room
Pump Tank	Boiler Room
Joint Compound	Scattered Locations

TABLE 1 – IDENTIFIED ASBESTOS-CONTAINING MATERIALS	
Material Description	**Material Location**
Floor Tile and Mastic	Throughout Building
2' X 4' Ceiling Tile	7th Floor Room 703, 29th Floor Kitchen
1' X 1' Galaxy Ceiling Tile	20th Floor East Center Room
Window Caulk	Windows
Paper Back on radiator	8th Floor NE Room, 27th Floor W Center, and 27th Floor SW Office Area
Fire Door	Stair Doors and Stairway Restroom Doors
Mirror Mastic	Various Tenant Spaces-Assumed
Roofing Materials	Roof-Assumed

3.0 PREVIOUS ASBESTOS SURVEYS DATA GAPS

3.1 Identified Data Gaps

Following the review of the May 2014 and June 2016 Terracon asbestos survey reports, the SCS survey design team identified the following data gaps:

- No sample location drawings;
- No photographic documentation of positively identified ACM; and
- Missing or assumed building materials not sampled.

3.2 Resolution of Identified Data Gaps

To resolve the identified data gaps listed above, the SCS survey design team completed the following activities:

- Generate and provide sample location drawings for all additional building materials tested, see Figures – Asbestos Sample Location Maps;
- Collect and generate photographic documentation of newly identified ACM, see **Appendix E**; and;
- Compile a list of assumed or missing building materials to be sampled and analyzed for asbestos content.

4.0 VERIFICATION ASBESTOS SURVEY

4.1 Regulatory Overview

This ACM survey was conducted in accordance United States Environmental Protection Agency (EPA) Asbestos Hazard Emergency Response Act (AHERA), 40 Code of Federal Regulations (CFR) Part 763; National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61; Occupational Safety and Health Administration (OSHA) Asbestos Standard for the Construction Industry 29 CFR 1910.1101; and OSHA Toxic and Hazardous Substances, Subpart Z – Asbestos 29 CFR 1910.1001. The ACM survey was completed by Mr. Jamie Marshall with Marshall. Mr. Marshall is an EPA AHERA accredited and State of Oklahoma-Certified Asbestos Project Designer/Management Planner. A copy of Mr. Marshall's asbestos licenses is presented in **Appendix A**.

NESHAP 40 CFR Part 61 regulates asbestos fiber emissions and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activity. Under NESHAP, ACMs are classified as either Friable, Category I Non-Friable or Category II Non-Friable. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure. Category I Non-Friable ACM includes packings, gaskets, resilient floor coverings and asphaltic roofing products. Category II Non-Friable ACM are any materials other than Category I materials that contain greater than one percent asbestos.

Friable ACM, Category I Non-Friable ACM and Category II Non-Friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities is considered regulated asbestos-containing material (RACM). RACM must be removed prior to renovation or demolition activities regardless of the amount of asbestos materials present.

OSHA 29 CFR 1910.1101 regulates workplace exposure to asbestos. The OSHA Permissible Exposure Limit (PEL) requires that long-term employee exposure to airborne asbestos fibers be maintained below 0.1 fibers per cubic centimeter (f/cc) of air averaged over an eight-hour time period. The OSHA Excursion Limit (EL) requires that short-term employee exposure to airborne asbestos fibers must be below 1.0 f/cc averaged over a 30 minute time period. The OSHA standard classifies construction and maintenance activities which could disturb ACM, and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

4.2 Property Description

The West Building structure was constructed in 1931 and consists of approximately 451,086 square feet. This structure is a 33-story concrete and steel structure with a basement and sub-basement. The Client provided generic floor plans for this survey to SCS, Family Environmental and Marshall for review and markup; see **Asbestos Sample Location Maps,** following this survey report.

4.3 Homogeneous Materials Assessment

The SCS survey team building inspectors developed an individual homogeneous material sampling list which identifies individual building materials present at the Property, see **Appendix B**. A homogeneous material area consists of building materials which appear similar throughout in terms of color, texture, and date of construction application. A homogeneous material sampling list is utilized during a survey to ensure all identified suspect building materials are sampled. The homogeneous materials list is comprised of friable surfacing materials, friable thermal systems insulation, and miscellaneous materials. Random suspect ACM samples are collected across each individual homogeneous material or in this case, specific materials that will be disturbed during microbial remediation activities. Once the homogeneous material sampling list was complete, a sample number scheme was developed which incorporated acronym descriptions of the building material to be sampled and a numerical value to track each homogeneous material.

4.4 Sample Number Assignment Methodology

The SCS survey team building inspector utilized a methodical, site-specific sampling identification (ID) number for all building material samples collected during the FNC Center Building survey verification. An example of the site-specific sampling ID number is listed below:

57^{A}-1^{B}-1^{C}-1^{D}

A. Building construction date identifier;
B. Floor where the building material was sampled;
C. Building material homogeneous material number;
D. Assigned sequential value identifying the total number of samples collected.

4.5 Friability Assessment

An assessment of each homogeneous building material of suspect ACM was conducted to determine the general condition and friability of each building material. The EPA defines a

friable material as one which, when dry, can be crumbled, pulverized or reduced to powder by hand pressure. Non-friable materials do not meet this criterion. Friability was assessed by the building inspector by physically touching all building materials prior to sampling.

4.6 Bulk Sample Collection

ACMs include nearly all building materials except glass, metal, and wood. An appropriately attired building inspector collected suspected ACM samples using wet methods, as applicable to reduce the potential for fiber release. Collected samples were placed in sealable containers and labeled with unique sample numbers using an indelible marker. The survey team identified a total of **109** different homogeneous building materials to be sampled and collected a total of **322** bulk samples across the identified homogeneous building materials at the Property. Friable and non-friable samples were collected during survey activities. A sample summary sheet of all samples collected during this ACM survey is presented in **Appendix C** which, details which building materials containing asbestos and the associated asbestos percentage.

4.7 Laboratory Information

Building material samples were submitted under proper chain-of-custody procedures to River North Environmental Testing, Inc. (RNET) of Denver, Colorado, for analysis by polarized light microscopy (PLM) with dispersion staining techniques per EPA methodology (40 CFR 763, Subpart F). Microscopical visual estimation was used in obtaining the percentage of asbestos in the bulk samples. RNET is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), code 200448-0. **Appendix D** contains these analytical results.

4.8 Newly Identified or Confirmed ACM

As discussed in Section 3.2, Resolution of Identified Data Gaps, additional bulk sampling or confirmation bulk sampling was conducted to fully identify ACM located in the West Building. Table 2 below, lists newly identified or confirmed ACMs located in the West Building. The information listed in Table 1 and Table 2 should be utilized to develop an appropriate asbestos abatement design prior to building demolition/renovation activities. Photographic documentation of positive ACM identified during this verification survey is located in **Appendix E**.

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM

Material Description	Area	Floor	Location
Red floor tile with mastic	NE Vault Room	Basement	East
Floor tile with mastic	NE Vault Door	Basement	East

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM			
Material Description	**Area**	**Floor**	**Location**
Black floor tile with mastic	Deposit Box	Basement	Floor
Floor tile with mastic	Deposit Box	Basement	Floor
Tan 12"x12" floor tile with black mastic	30	Basement	Floor
Gray 9"x9" floor tile with black mastic	Maintenance Office	Basement	Floor
Layered wall system	35	Basement	Wall
Layered wall system	Nancy F. Rm. 9	1	North wall
Black mastic/carpet glue	Nancy F. Rm. 1	1	Floor
Mirror mastic	Nancy F. Rm. 7	1	North wall
Fireproofing overspray	Nancy F. Rm. 1	1	Ceiling
Black mastic/carpet glue	Laser Therapy 1	1	Floor
Beige floor tile with mastic	Workshop	1	Floor under carpet
Pink floor tile with mastic	Gina Taylor 2	1	Floor
Beige 12x12 floor tile with mastic	Gina Taylor 2	1	Floor
Beige 12x12 floor tile with mastic	SE Corridor	1	Floor
White marbled floor tile with mastic	Café 7	1	Floor
Green speckle floor tile with mastic	N. Hallway	1	Floor
Layered wall system	1	4	SE wall
Layered wall system	Suite 560-RM 8	5	North wall
Cement board canter	Suite 560-RM 6A	5	South wall
Cement board canter	Suite 560-RM 5	5	South wall
Layered wall system	RM 1200	12	SE corner
Sink undercoating	RM 1200	12	Under sink basin
Layered wall system	RM 1362	13	SE corner

TABLE 2 – NEWLY IDENTIFIED OR CONFIRMED ACM			
Material Description	**Area**	**Floor**	**Location**
Layered wall system	RM 1506	15	East wall
Wall texture on plaster	RM 1713D	17	North wall
Layered wall system	RM 1822A	18	West wall
Layered wall system	2720A	27	NW closet corner
Layered wall system	3000B	30	South wall
Popcorn ceiling texture	3100B	31	Center ceiling

4.9 Presumed ACM

Presumed ACM (PACM), suspect ACM or assumed ACM are those building materials not sampled during an asbestos survey and assumed to contain asbestos based upon the following criteria:

- Prior knowledge obtained during previous asbestos survey execution which identified like building materials as asbestos-containing with subsequent laboratory analysis confirmation;
- The presumed material is defined as asbestos-containing TSI or surfacing material; and
- The building material is suspected to contain asbestos is based upon the estimated material manufacture and installation date.

As discussed earlier, the survey team reviewed previous Terracon asbestos surveys for the Property which listed all mirror mastic and roofing materials as assumed ACM. In addition to the assumed ACM listed in the Terracon surveys, the survey team observed the following building materials at the Property and assumed them to contain asbestos: pipe gaskets, TSI, any/all electrical components, buss duct paper, and all elevator components. An attempt was made to survey all areas of the Property and collect bulk samples of building materials suspected of containing asbestos. However, building materials located within wall cavities, void spaces or otherwise concealed and inaccessible to the survey team at the time of sampling are assumed to be asbestos-containing until tested and proven otherwise.

5.0 CONFIRMATION OF PREVIOUSLY ABATED AREAS

During on-site survey activities at the Property and following an interview conducted with Mr. Brian Taulbee, FNC maintenance supervisor, it was discovered that areas of the adjacent East Building have undergone previous partial asbestos abatement activity. Based on the East Building abatement information, Mr. Taulbee was questioned whether areas of the West Building were previously abated. According to Mr. Taulbee's knowledge, no asbestos abatement activity has been conducted within the West Building.

6.0 REMAINING ASBESTOS ABATEMENT MATERIALS

Floors and areas within the West Building along with their associated designated ACM still requiring asbestos abatement are listed in Table 3-Remaining Asbestos Abatement Areas, below. The ACM materials listed in Table 3 are those materials identified in the Terracon survey reports and newly identified/confirmed materials discovered during this verification asbestos survey which will require proper asbestos abatement.

TABLE 3 – REMAINING ASBESTOS ABATEMENT AREAS		
Floor(s)	**Remaining ACM**	**Location(s)**
Boiler RM	Friable Ceiling Thermal Plaster	Boiler Room Ceiling
Varies	Acoustical Ceiling	Vault Safe Deposit Area, 4th Floor southeast. 31st Floor, 31st Floor Attic & 32nd Floor
All	Brown Mastic Behind 1'x1' Ceiling Tile	Behind 1'x1' Ceiling Tiles Throughout
Varies	Duct Paper Tape and fiberglass	13th Floor, 31st Floor, and 31st Floor attic
All	Piping / Fittings (steam, domestic water, drain)	Throughout building
Varies	Transite ®	16th Floor back of elevator room doors, Radiators, Cooling Tower
17, 33	Tank Insulation	Drinking water Tank 17th and 33rd Floor
12	Duct Insulation	12th-27th Floors and 31st Floor Attic AHU Rooms, Boiler Duct
Boiler RM	Hot Water Tanks (3)	Boiler Room
Boiler RM	DA Tank	Boiler Room
Boiler RM	Sand Filler Tank	Boiler Room
Boiler RM	Pump Tank	Boiler Room
All	Joint Compound	Scattered Locations
All	Floor Tile and Mastic	Throughout Building
7, 29	2' X 4' Ceiling Tile	7th Floor Room 703, 29th Floor Kitchen
20	1' X 1' Galaxy Ceiling Tile	20th Floor East Center Room
All	Window Caulk	Windows
8, 27	Paper Back on radiator	8th Floor NE Room, 27th Floor W Center, and 27th Floor SW Office Area
All	Fire Door	Stair Doors and Stairway Restroom Doors

TABLE 3 – REMAINING ASBESTOS ABATEMENT AREAS		
Floor(s)	**Remaining ACM**	**Location(s)**
Roof	Roofing Materials	Roof-Assumed
All	Layered wall system-Joint Compound on Drywall	Basement – 32nd Floor
All	Mirror mastic	Nancy F. Rm. 7
1	Fireproofing overspray	Nancy F. Rm. 1, Escalator access, Medicine Cabinet
5	White cement board canter	Suite 560-RM 6A
5	Gray cement board canter	Suite 560-RM 5
All	Black sink undercoating	Under sink basins
17	Wall texture on plaster	Throughout floor
31	Popcorn ceiling texture	3100B

7.0 FINDINGS & CONCLUSIONS

7.1 Survey Findings

The findings of this asbestos survey verification, compiled by the survey design team, identified data gaps within the previously prepared asbestos surveys. The identified data gaps were resolved through a comprehensive building walk-through; additional on-site material bulk sampling; photograph collection; sample location drawing generation; and on-site interviews with FNC maintenance personnel. Following the collection of additional material samples, this survey identified or confirmed ACM within existing building materials, not listed in the previous surveys. The FNC maintenance personnel interviews were conducted to better understand areas within the West Building that may have been previously abated. Without knowledge of previous abatement information provided by FNC personnel, the survey design team was not able to eliminate asbestos abatement areas within the West Building and all ACM listed in Table 3 should be considered accurate as to the list of materials required for proper asbestos abatement.

7.2 Survey Conclusions

Based on the findings of this verification survey, it is our professional opinion, that prior to building renovation activities, full abatement of identified ACM should be anticipated for the building materials identified in Table 3, listed above.

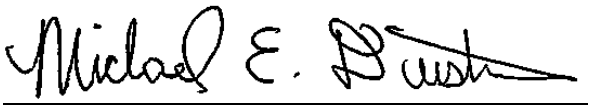
8.0 RECOMMENDATIONS

The SCS project team recommends a State of Oklahoma-Licensed and qualified asbestos abatement contractor conduct proper abatement of the Property structure prior to any building demolition/renovation activities. Additionally, we recommend an asbestos abatement project design be prepared by a State of Oklahoma-licensed project designer prior to conducting any abatement activity. The Oklahoma Department of Labor (ODOL) must approve all asbestos abatement designs prior to commencement of abatement activity.

9.0 LIMITATIONS

This asbestos verification survey was conducted in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing under similar conditions in the same locale. All results, findings, conclusions and recommendations expressed in this report are based on conditions observed during our survey of the Property. The information contained in this report is relevant to the date on which this survey was performed, and should not be relied upon to represent conditions at a later date. This report has been prepared on behalf of and exclusively for use by the Client for specific application to their project as discussed. This report is not a bidding document. All contractors or consultants reviewing this report must draw their own conclusions regarding further investigation or remediation deemed necessary. Family Environmental does not warrant the work of regulatory agencies, laboratories or other third parties supplying information which may have been used in the preparation of this report. No warranty, express or implied is made.

This asbestos verification survey report was prepared by:



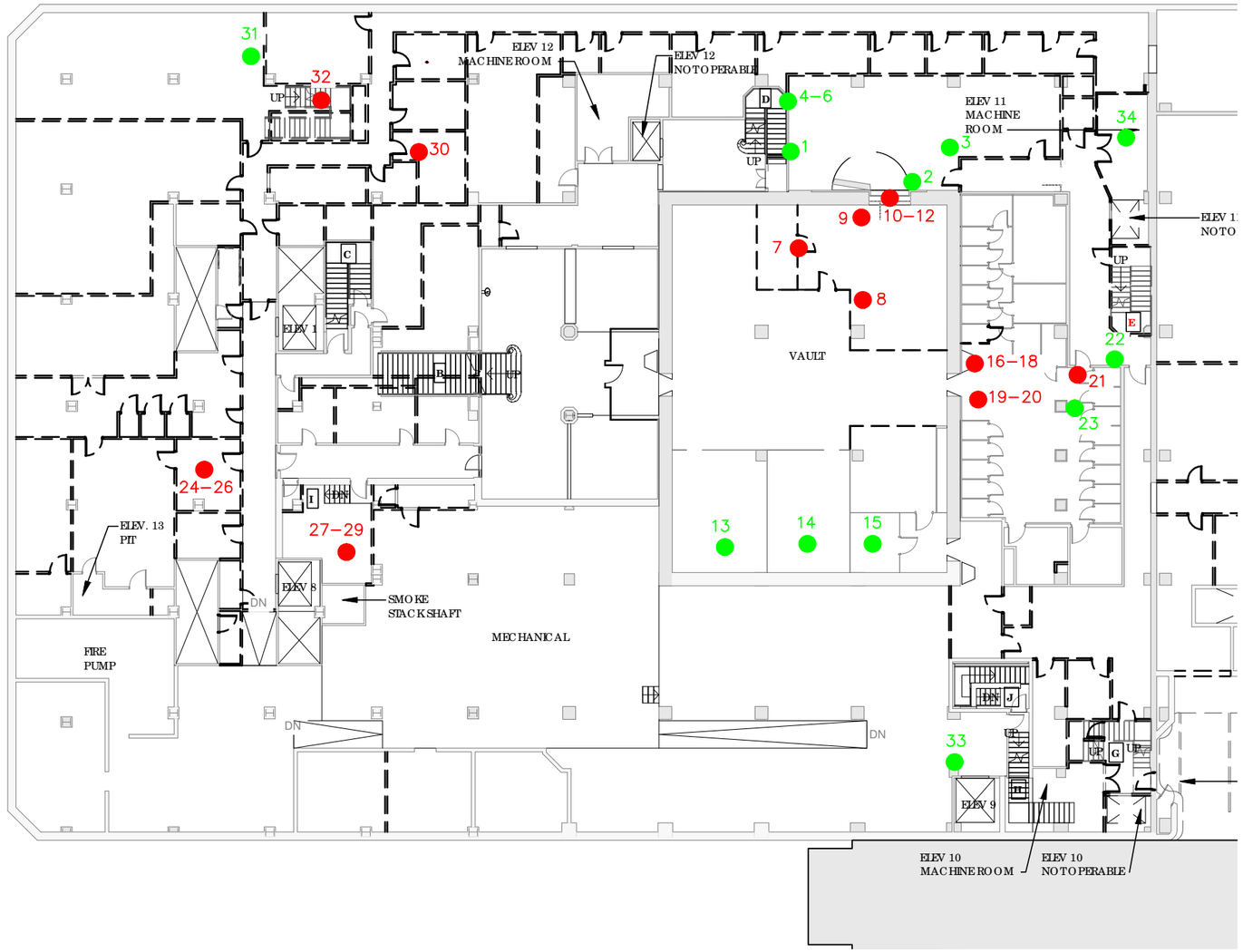
Date: January 20, 2017

Michael E. Dustman

Family Environmental Compliance Services, Inc.
600 East 8th Street, Suite B
Kansas City, Missouri 64106
Phone: (816) 527-0101

FIGURES

ASBESTOS SAMPLE LOCATION MAPS



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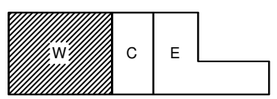
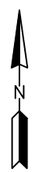
- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION





NOT TO SCALE

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PH. (913) 681-0030 FAX NO. (913) 681-0012

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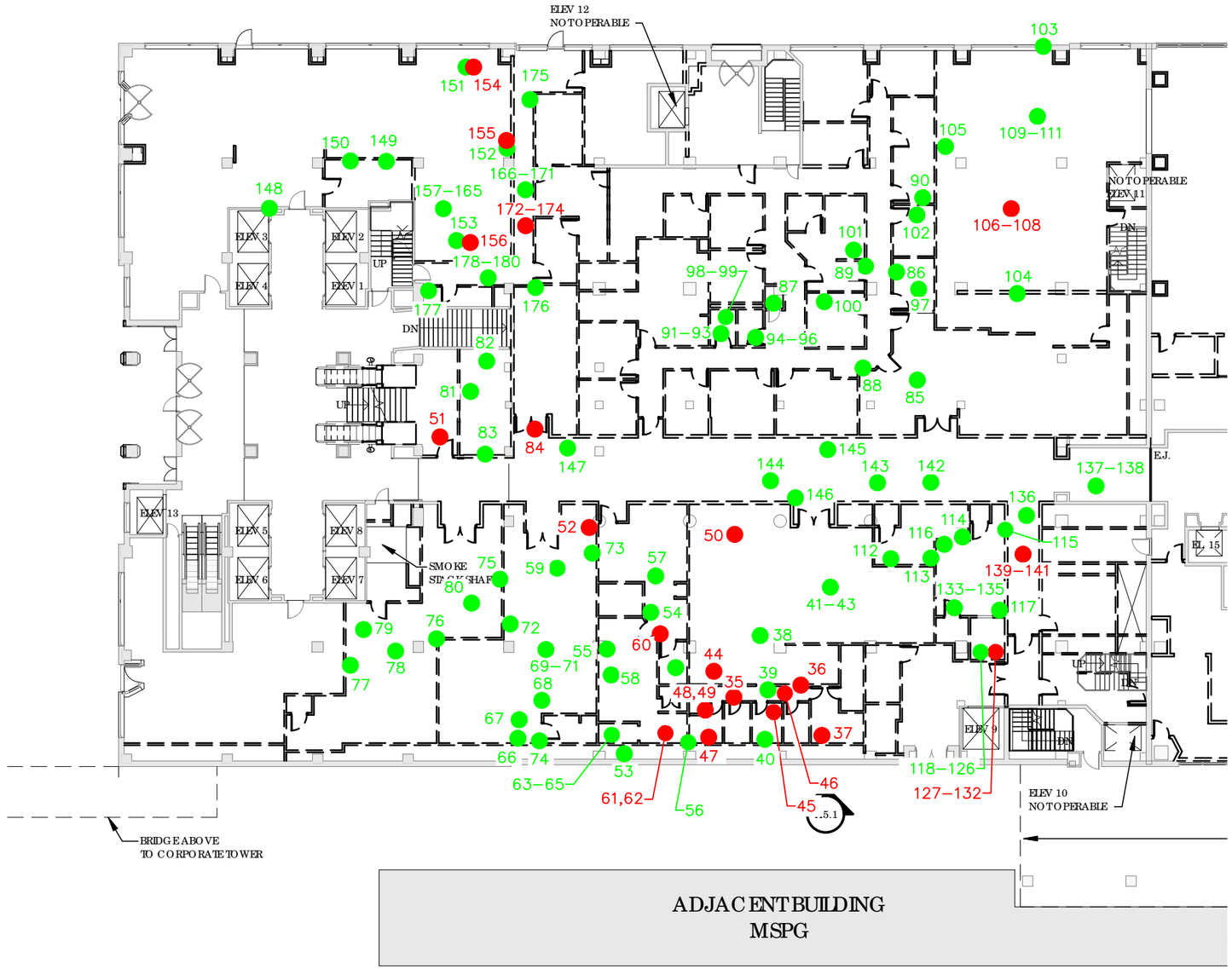
BASEMENT
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**

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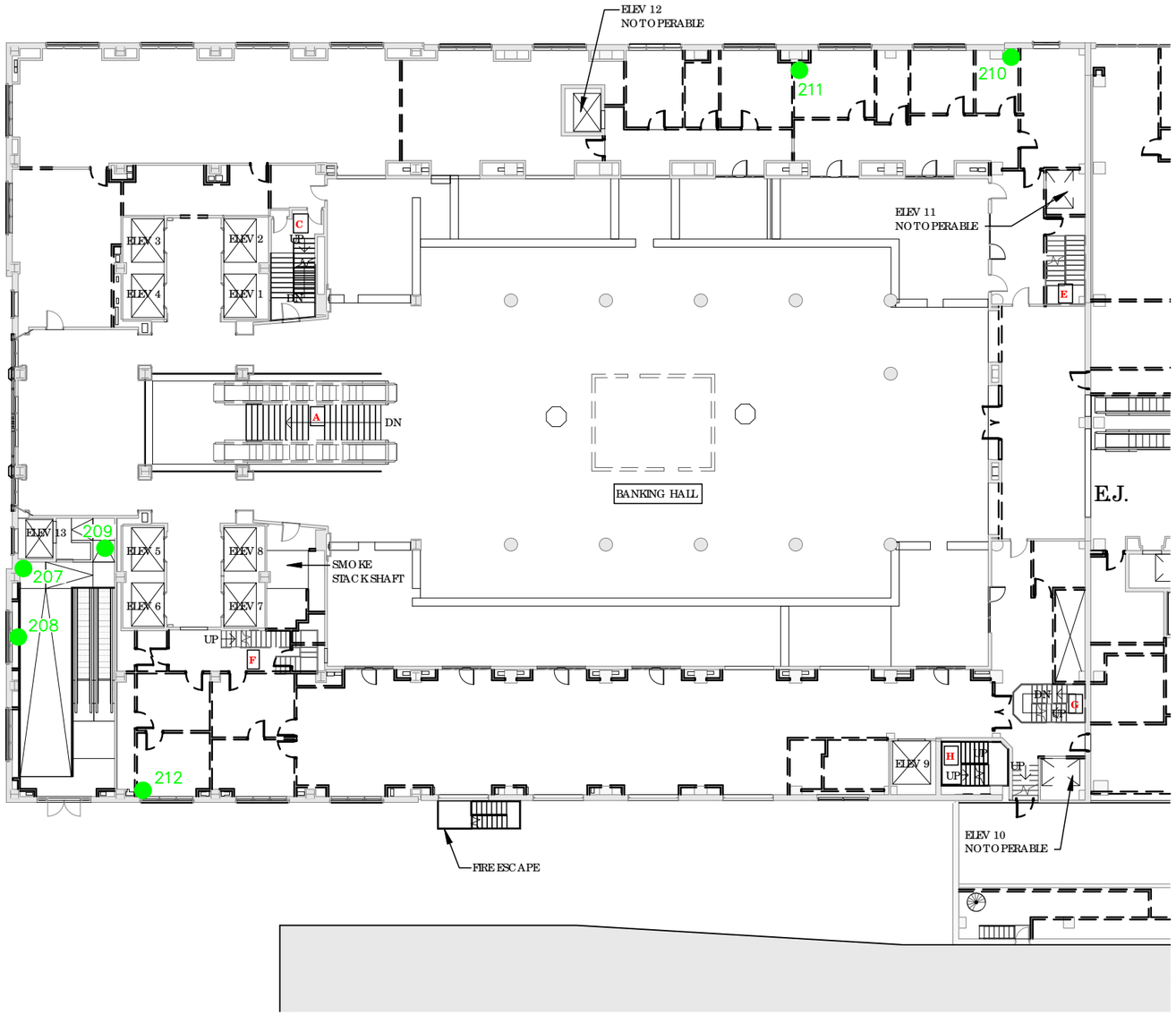
FIRST FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

\\KAN-FS01\clients\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\



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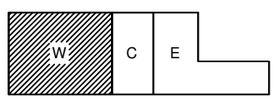
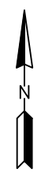
- **NEGATIVE ACM SAMPLE LOCATION**





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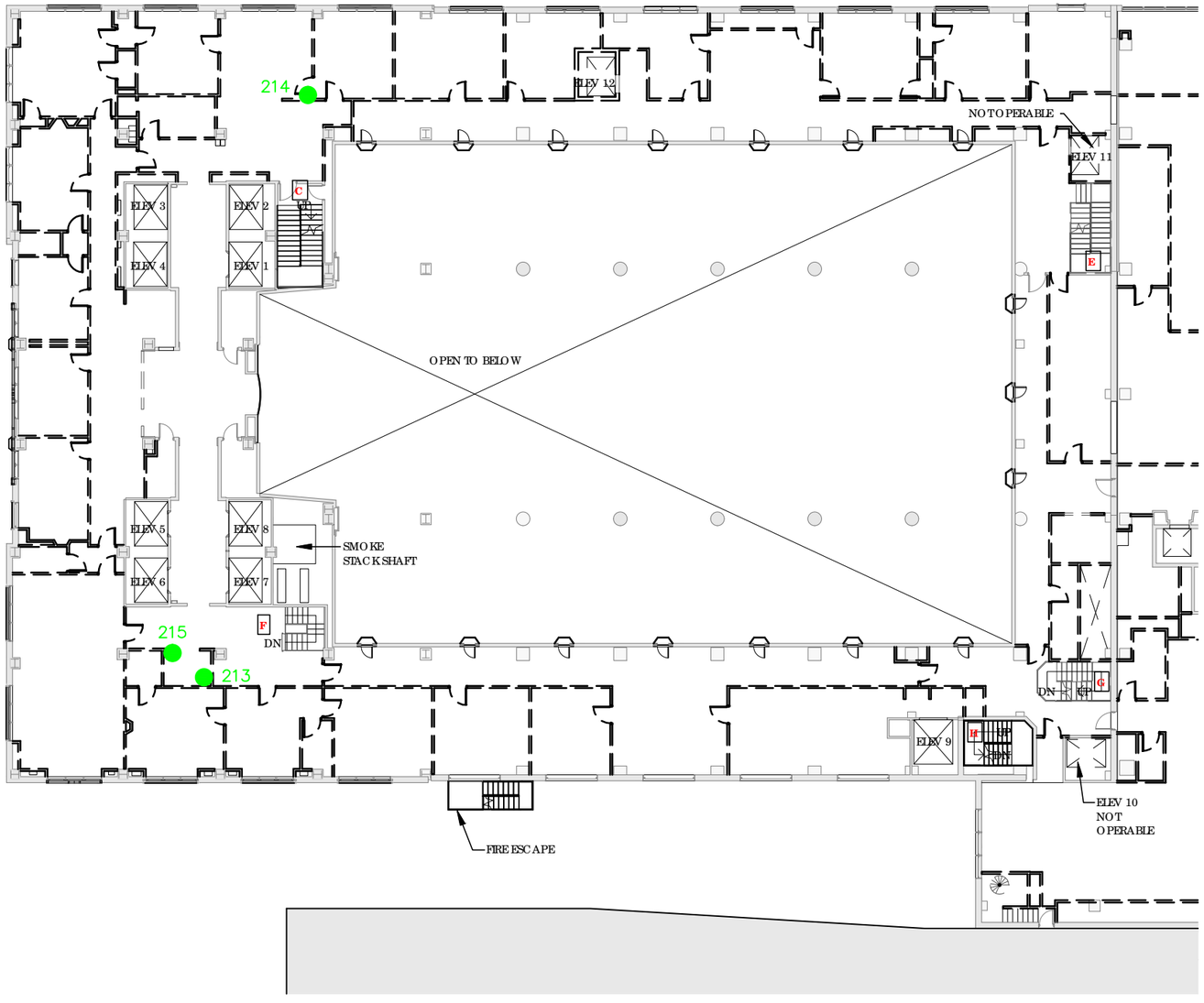
SECOND FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



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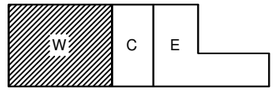
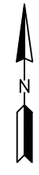
- NEGATIVE ACM SAMPLE LOCATION





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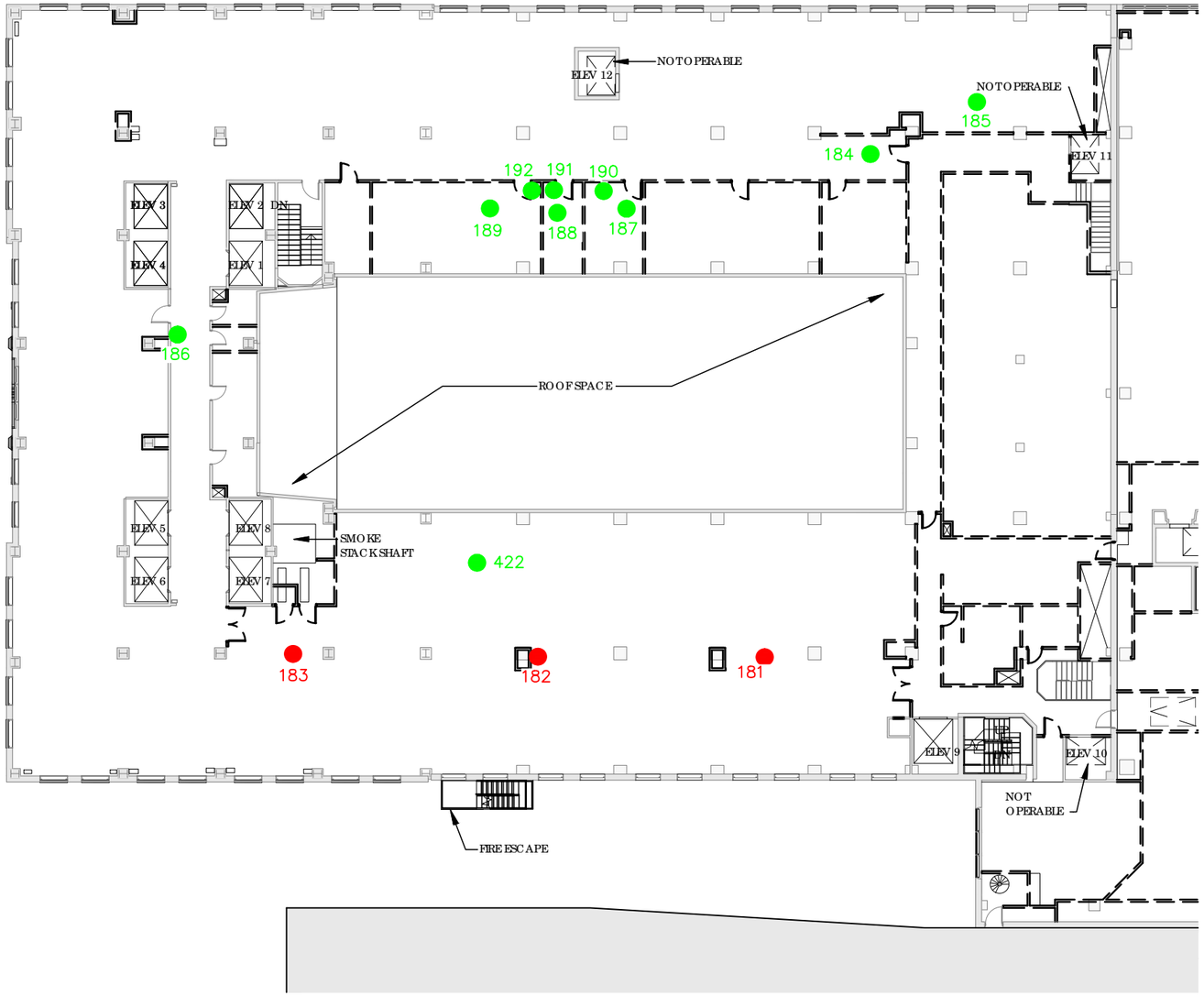
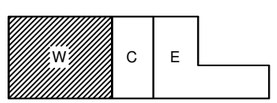
THIRD FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



LEGEND

- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION



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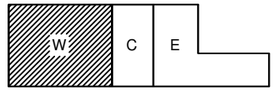
FOURTH FLOOR ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

LEGEND

- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION



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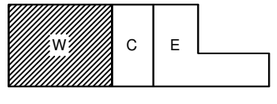
FIFTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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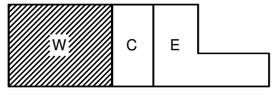
SIXTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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SEVENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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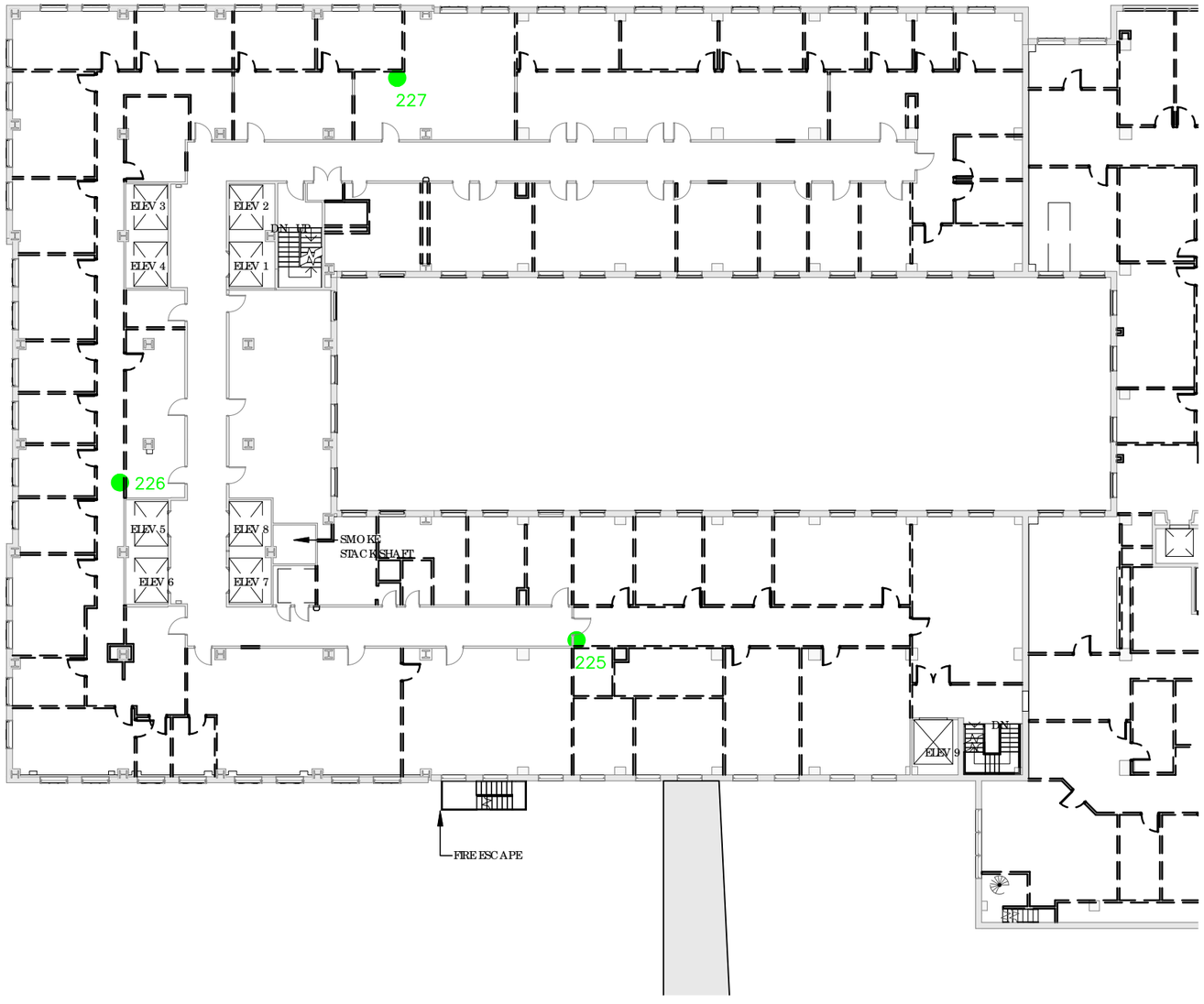
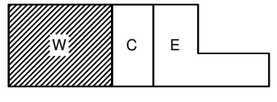


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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EIGHTH FLOOR
ACM SAMPLE LOCATION MAP

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OKLAHOMA CITY, OKLAHOMA

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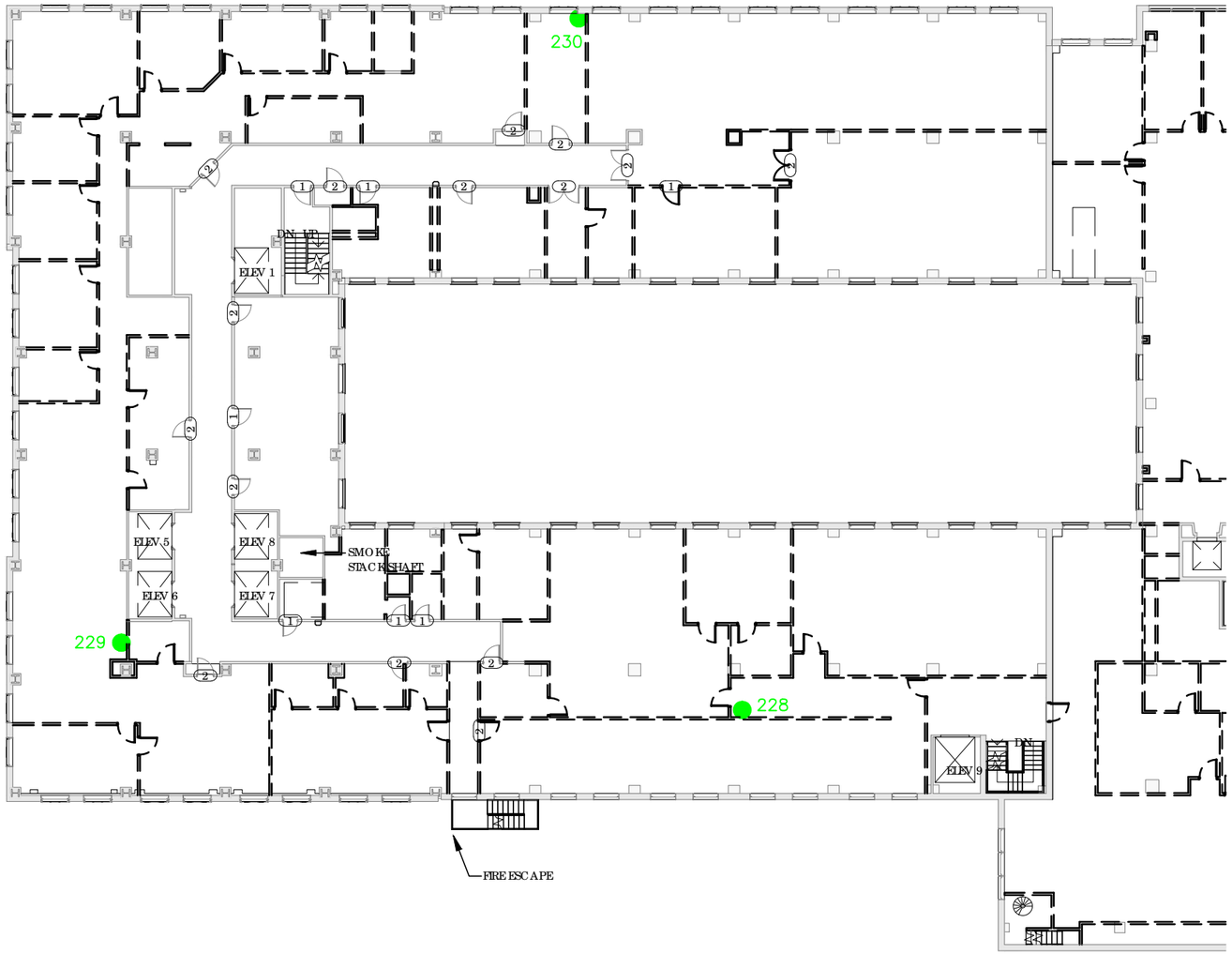
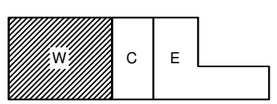


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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NINTH FLOOR
ACM SAMPLE LOCATION MAP

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FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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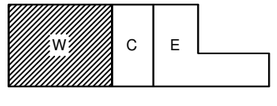
LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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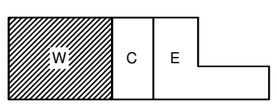
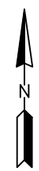
TENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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ELEVENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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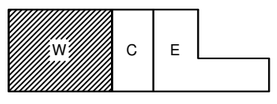
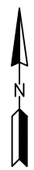
LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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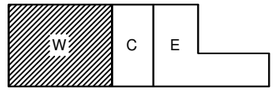
TWELFTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

LEGEND

- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION



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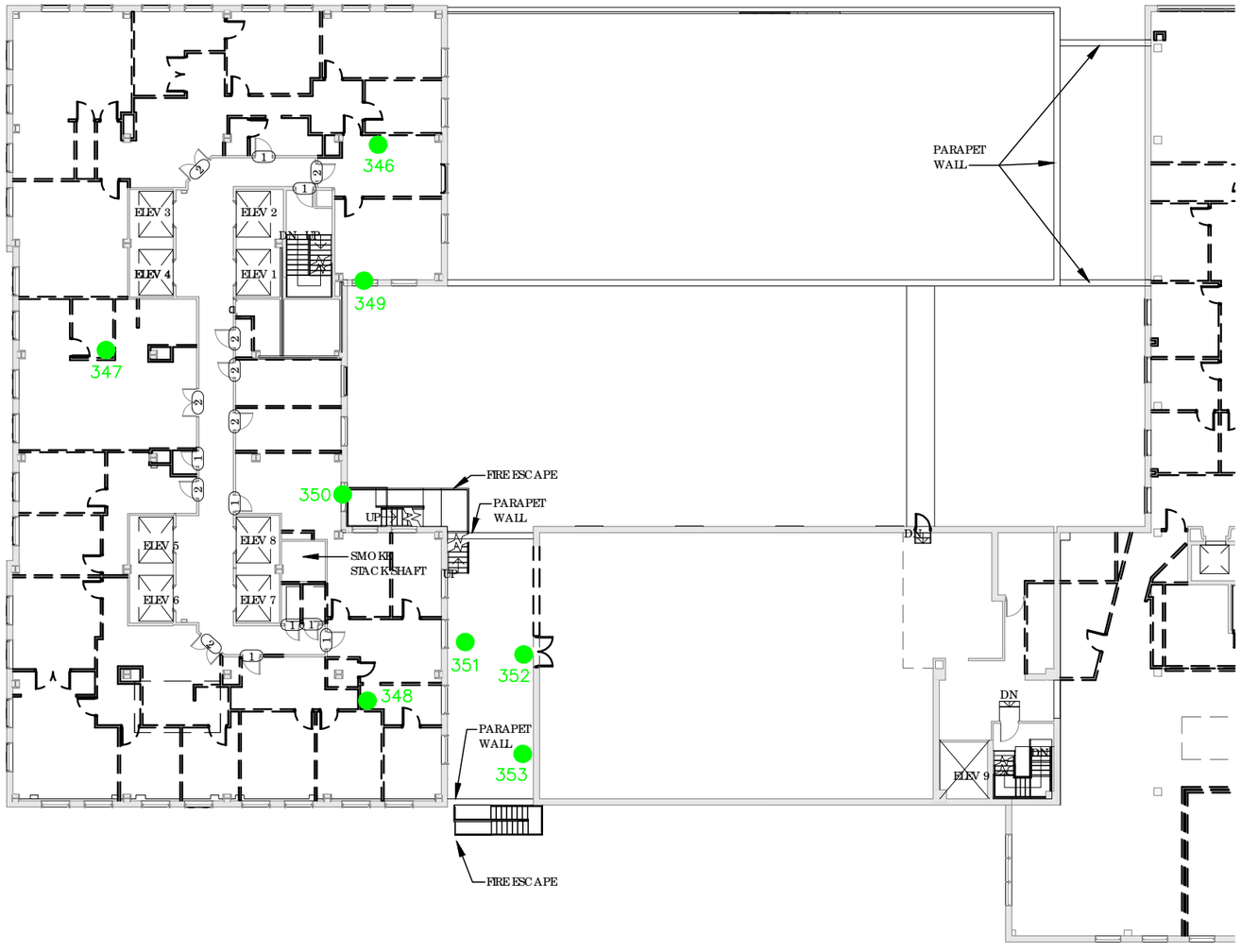
THIRTEENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**

W C E

N

NOT TO SCALE

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FOURTEENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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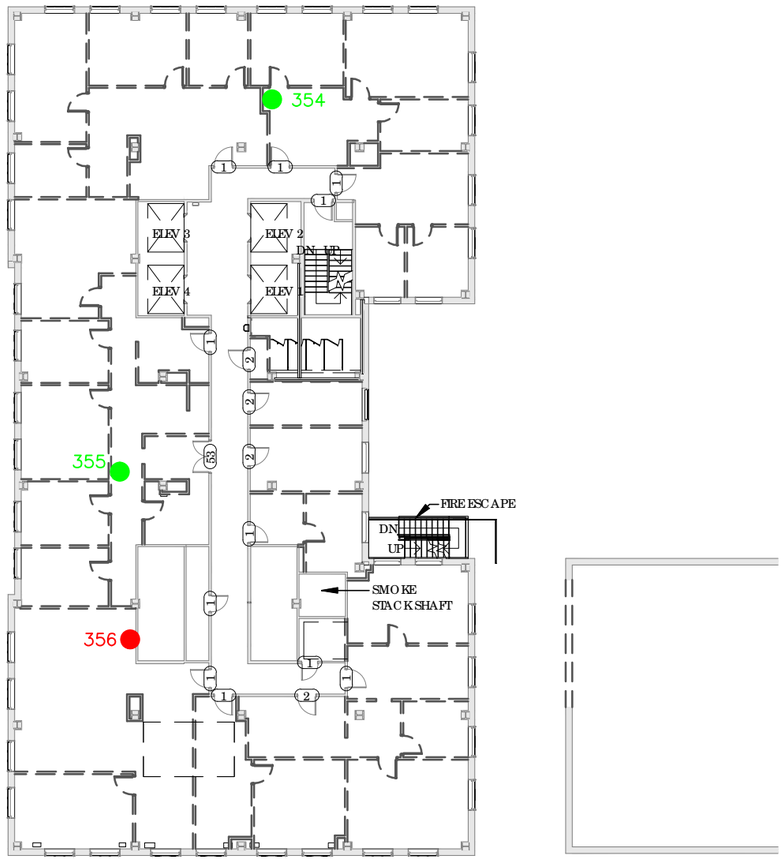
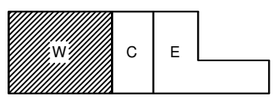
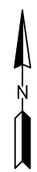


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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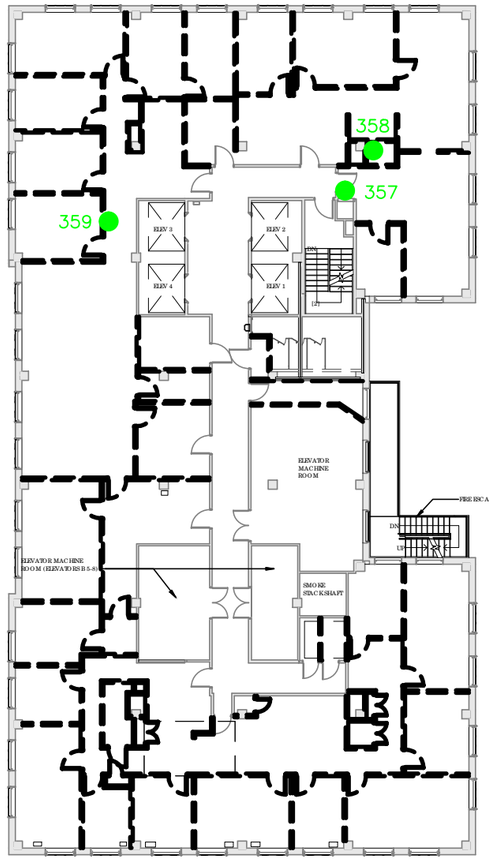
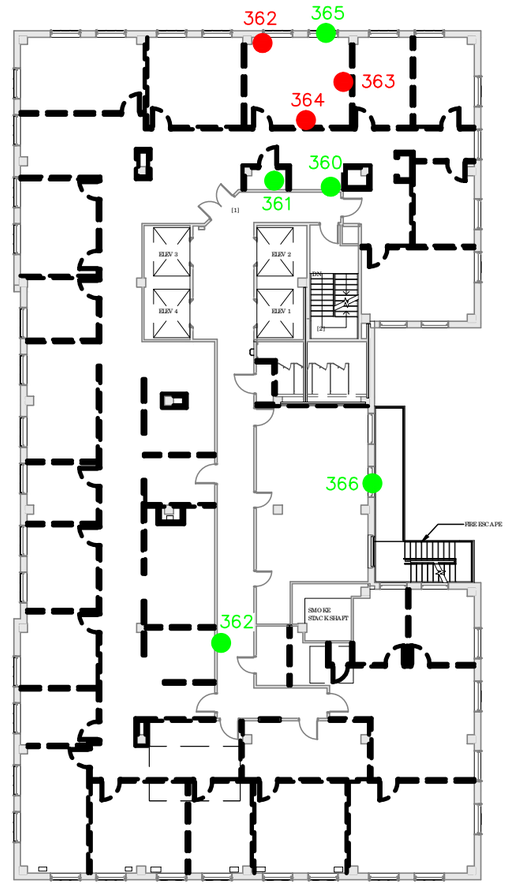
FIFTEENTH FLOOR
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



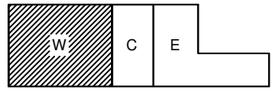
SIXTEENTH FLOOR



SEVENTEENTH FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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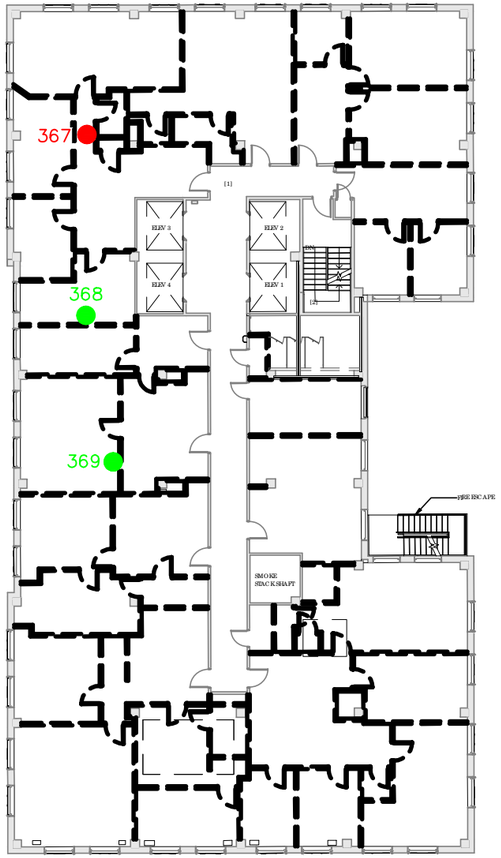
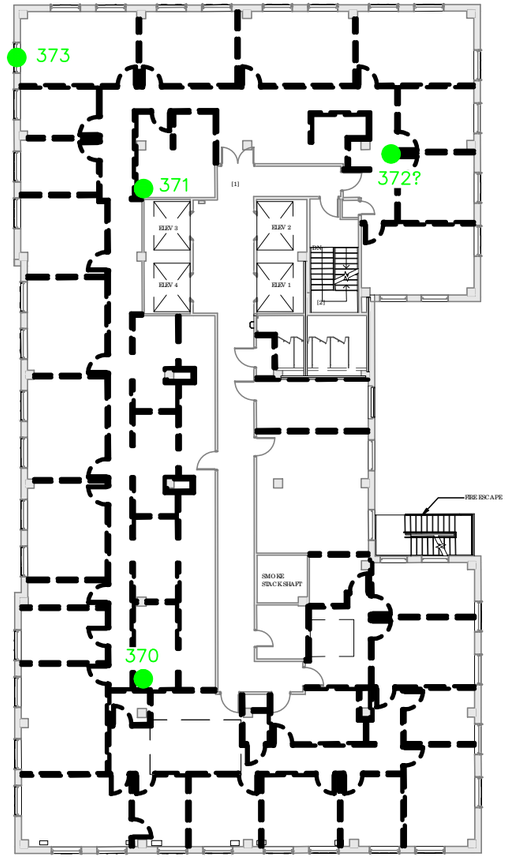
SIXTEENTH AND SEVENTEENTH FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



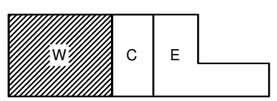
EIGHTEENTH FLOOR



NINETEENTH FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



NOT TO SCALE

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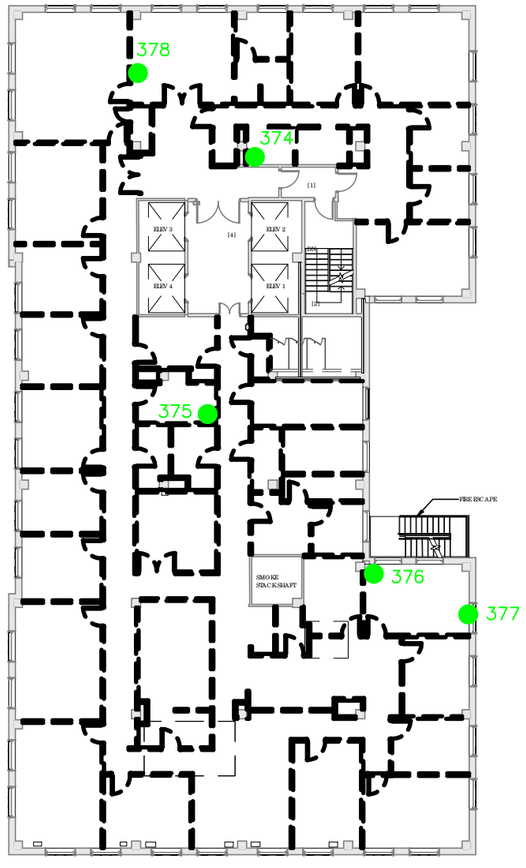
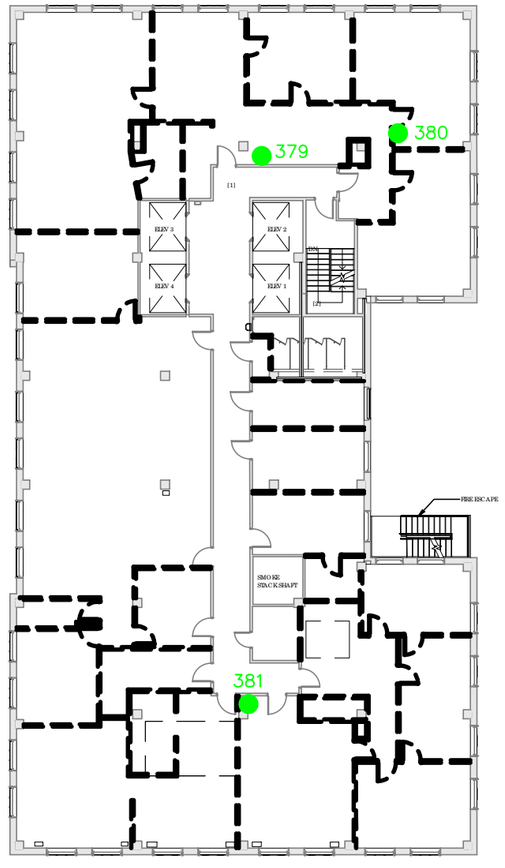
EIGHTEENTH AND NINETEENTH FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



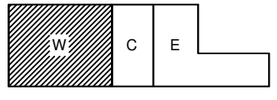
TWENTIETH FLOOR



TWENTY–FIRST FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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TWENTIETH AND TWENTY–FIRST FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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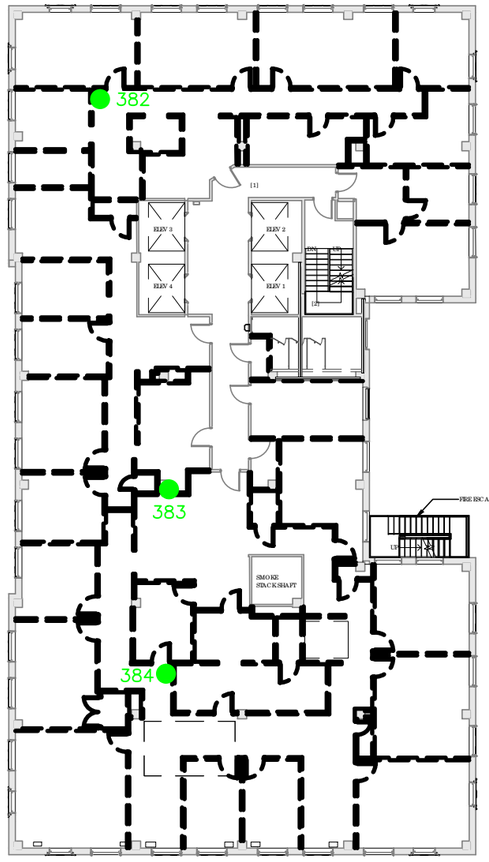
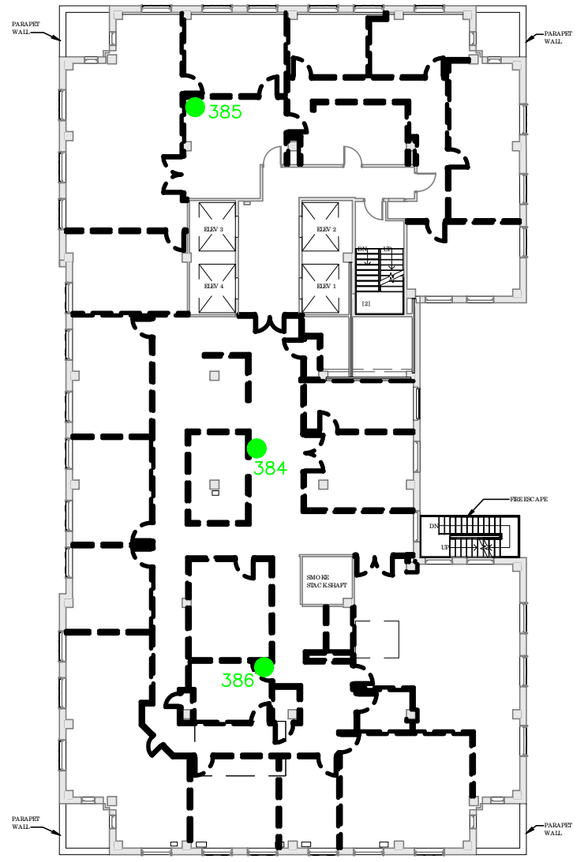


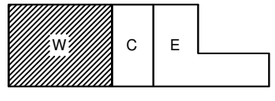
TWENTY–SECOND FLOOR



TWENTY–THIRD FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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TWENTY–SECOND AND TWENTY–THIRD FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
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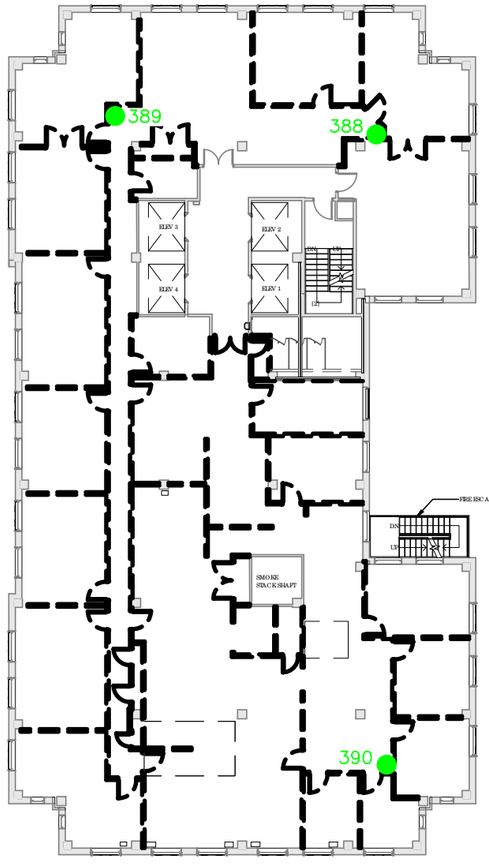
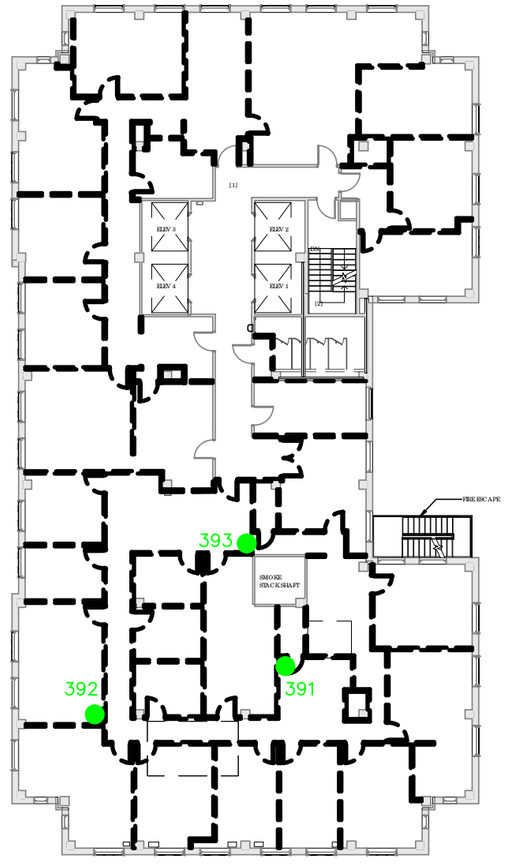


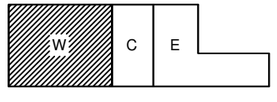
TWENTY–FOURTH FLOOR



TWENTY–FIFTH FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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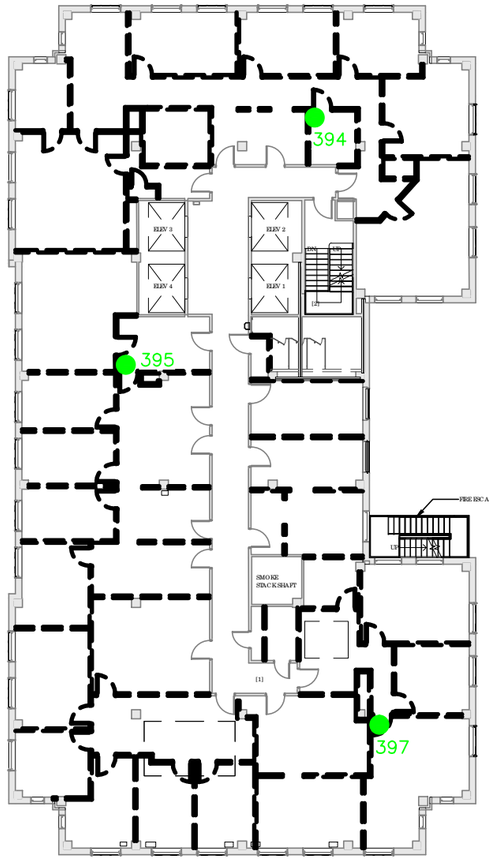
27216366.00	--	--	--

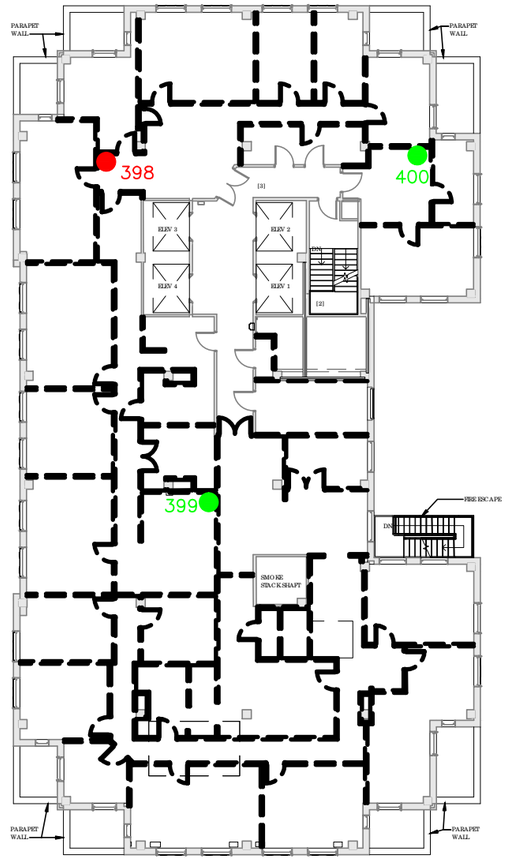
TWENTY–FOURTH AND TWENTY–FIFTH FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

\\KAN-FS01\clients\City Of Oklahoma City\First National 27216366.00\80 Percent Demo CAD For East And Center\Drawings-27216166.00\FNC-West Sample Locations Maps.dwg



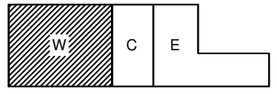
TWENTY–SIXTH FLOOR

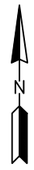


TWENTY–SEVENTH FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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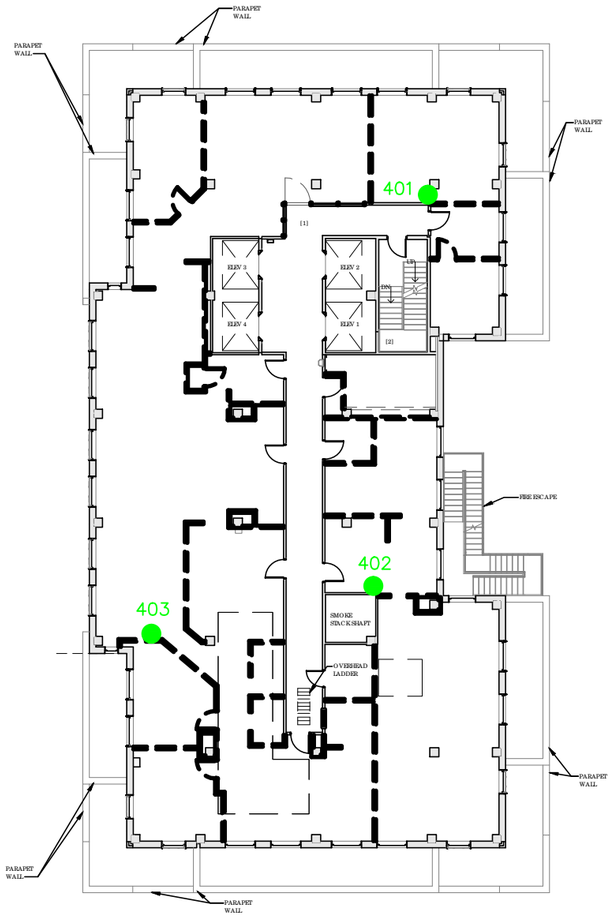
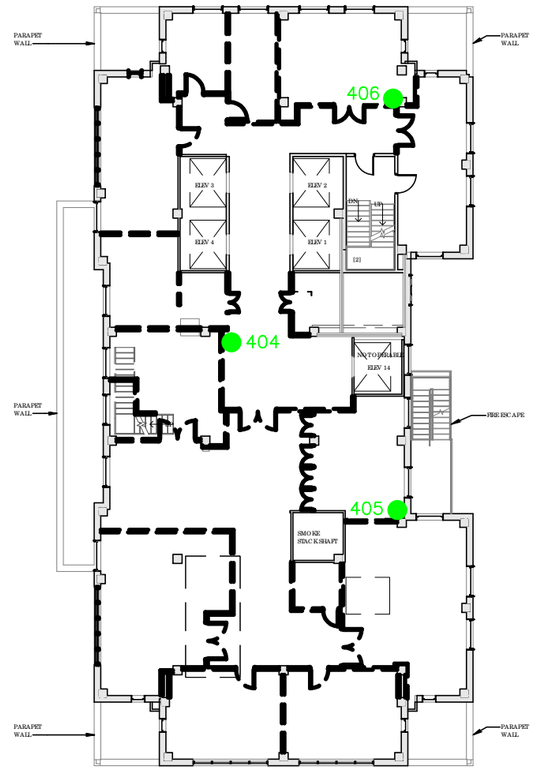
27216366.00	--	--	--

TWENTY–SIXTH AND TWENTY–SEVENTH FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



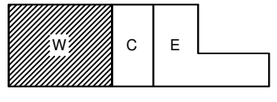
TWENTY–EIGHTH FLOOR



TWENTY–NINTH FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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TWENTY–EIGHTH AND TWENTY–NINTH FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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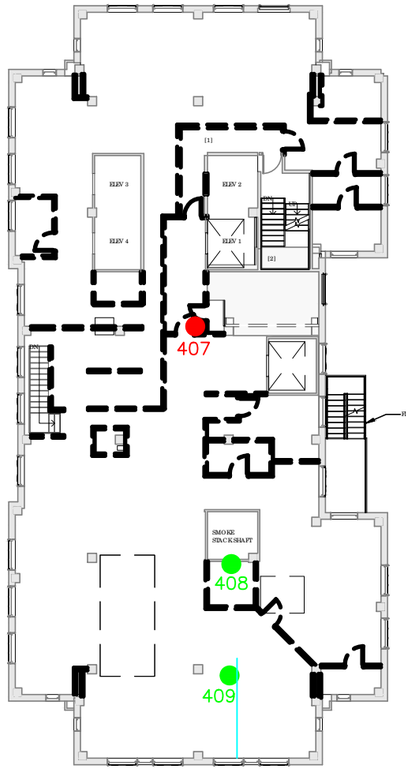
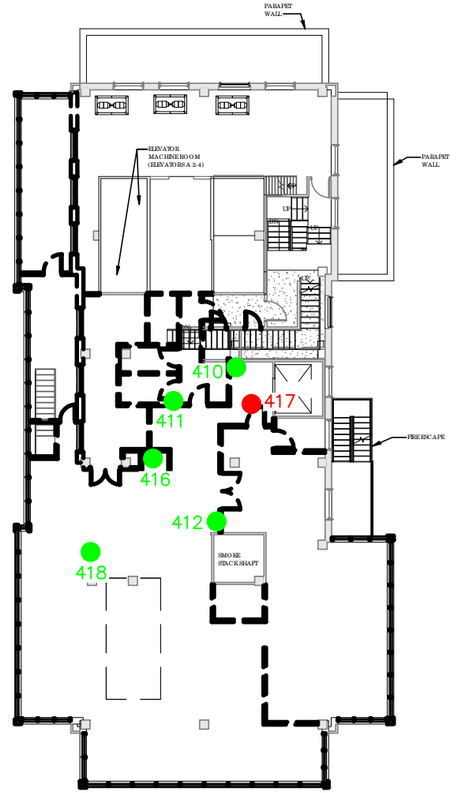


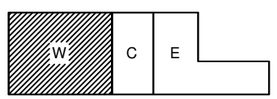
THIRTIETH FLOOR

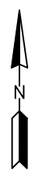


THIRTY–FIRST FLOOR

LEGEND

- POSITIVE ACM SAMPLE LOCATION
- NEGATIVE ACM SAMPLE LOCATION





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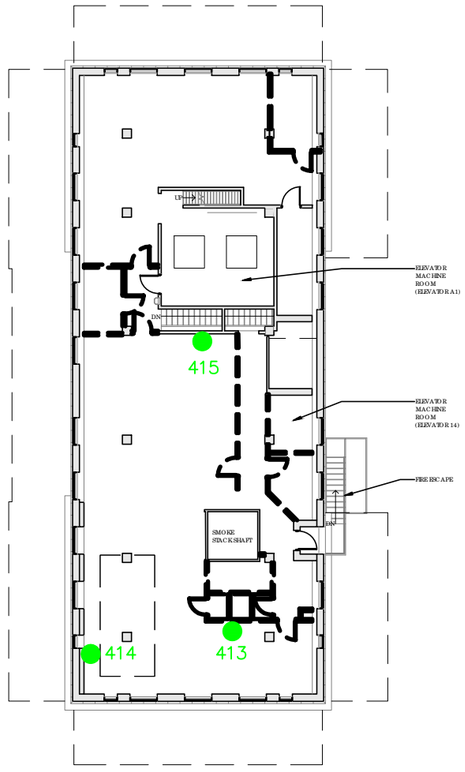
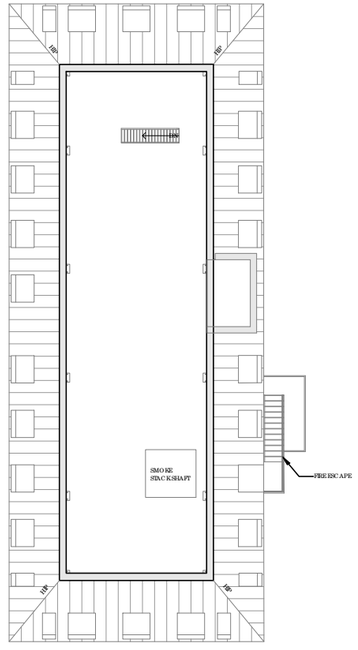
THIRTIETH AND THIRTY–FIRST FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA



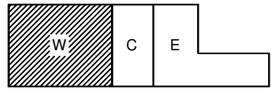
THIRTY–SECOND FLOOR

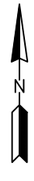


THIRTY–THIRD FLOOR

LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**





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THIRTY–SECOND AND THIRTY–THIRD FLOORS ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
FIRST NATIONAL CENTER
120 N. ROBINSON
OKLAHOMA CITY, OKLAHOMA

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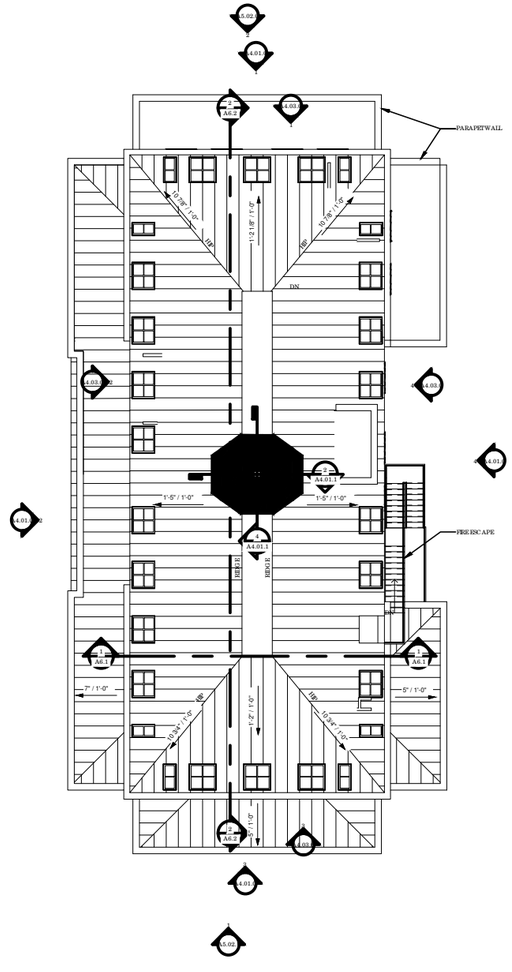
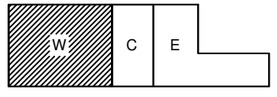


LEGEND

- **POSITIVE ACM SAMPLE LOCATION**
- **NEGATIVE ACM SAMPLE LOCATION**



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ROOF
ACM SAMPLE LOCATION MAP

WEST BUILDING (1931)
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OKLAHOMA CITY, OKLAHOMA