

ADDENDUM No. 1

**TOWN HALL AND FIRE DEPARTMENT DEMOLITION PROJECT
TOWN of CANTON, NC
Addendum Date: May 13, 2026**

Engineer
McGill Associates, PA
5400 Trinity Rd., Suite 107
Raleigh, NC 27607 – (919) 378-9111

BID DUE DATE & TIME: May 22, 2026, 2:00 PM

This Addendum Number ONE includes the following updates to the bid documents:

1. The Bid Solicitation was amended to reflect an updated bid due date of May 22, 2026
2. The Project Description is amended as follows:
 - a. All structure, paving, foundation and utilities shall be removed to at least 3 feet below grade and properly disposed of offsite. The Contractor shall track and provide documentation for the ultimate fate of all materials removed from the site. All remediation and disposal costs shall be included in the Contractor's bid. When complete the site shall be graded level, seeded and mulched. Perimeter erosion control shall remain until grass cover is established and approved by the Town.
3. The following hazardous material investigation reports by BLE dated May 13, 2026 are attached:
 - a. 21 Adams Street
 - i. Asbestos Containing Materials Survey
 - ii. Lead-Based Paint Assessment
 - b. 58 Park Street
 - i. Asbestos Containing Materials Survey
 - ii. Lead-Based Paint Assessment

The contractor shall include the abatement and proper disposal of all identified hazardous materials in the above reports in accordance with OSHA requirements in their bid. Hazardous material abatement must be completed prior to commencement of demolition activities.

4. Project duration – the project shall be fully completed by July 31, 2026.

Questions received as of the date of this addendum are addressed below:

1. Has the Town completed an asbestos survey?
Response: See Item 3 above.
2. Please provide clarification regarding licensing and bonding requirements for bidders.

Response: Bidders shall include evidence of Bidder's authority to do business in NC and Bidder's NC contractor license with their bid. No bonds are required.

This Addendum Number ONE is issued this 14th day of May 2026.

Michael Hanson, PE



**5400 Trinity Road, Suite 107
Raleigh, North Carolina 27607
919.378.9111
Firm License No.: C-0459**



The Town of Canton, NC is seeking solicited bids from three qualified contractors for the TOWN HALL and FIRE DEPARTMENT DEMOLITION PROJECT.

The project generally consists of the demolition of the former Town of Canton Town Hall and its appurtenances located at 58 Park Street as well as the former Town of Canton Fire Department its appurtenances located at 21 Adams Street, Canton, Haywood County, North Carolina, also described as Parcel 8657-70-8943. All structure, paving, foundation and utilities shall be removed to at least 3 feet below grade and properly disposed of offsite. The Contractor shall track and provide documentation for the ultimate fate of all materials removed from the site. All remediation and disposal costs shall be included in the Contractor's bid. When complete the site shall be graded level, seeded and mulched. Perimeter erosion control shall remain until grass cover is established and approved by the Town.

A separate bid for each building an appurtenances is required. Bidders shall comply with all applicable laws regulating the practice of General Contracting as provided in Chapter 87 of the General Statutes of the State of North Carolina and be properly licensed as a contractor. Bidders shall include evidence of Bidder's authority to do business in NC and Bidder's NC contractor license with their bid.

Owner will provide Bidder access to the Site to conduct such additional examinations, investigations, explorations, tests, and studies as Bidder deems necessary for preparing and submitting a Bid.

A Bid shall be received no later than May 22, 2026, 2:00 PM.

A mailed Bid shall be addressed to:

Lisa Stinnett, Town Manager

Canton Town Hall Boardroom

85 Summer Street

Canton, North Carolina 28716

ASBESTOS CONTAINING MATERIALS SURVEY: PRE-DEMOLITION

21 ADAMS STREET
CANTON, NORTH CAROLINA 28716

Prepared For:
Town of Canton
85 Summer Street
Canton, North Carolina 28716

BLE Project Number 26-29858.01

May 13, 2026



6004 Ponders Court | Greenville, SC 29615
☎ 864.288.1265 🖨 864.288.4330 ✉ info@blecorp.com
BLECORP.COM



TABLE OF CONTENTS

1.0 INTRODUCTION..... 1

2.0 SURVEY AREA..... 1

3.0 METHODOLOGY 1

4.0 SURVEY SUMMARY..... 2

4.1 Presumed ACMs 3

5.0 CONCLUSIONS AND RECOMMENDATIONS..... 3

6.0 CERTIFICATIONS AND QUALIFICATIONS..... 3

7.0 QUALIFICATION OF REPORT 4

Tables

Table 1	Suspect ACMs Surveyed
Table 2	Confirmed ACMs

Appendices

Appendix A	Figures
Appendix B	Photographs
Appendix C	Laboratory Analytical Report(s)
Appendix D	Professional Qualifications
Appendix E	Geoenvironmental Report



1.0 INTRODUCTION

Bunnell-Lammons Engineering, Inc. (BLE) performed a Pre-Demolition Asbestos Containing Materials (ACM) Survey of the former fire station building located at 21 Adams Street in Canton, Haywood County, North Carolina (herein referred to as the Site). The building is a two-story structure with an approximate 2,800-square foot footprint. This survey was performed in accordance with our Proposal No. 26-29858 dated April 28, 2026 and authorized by Ms. Lisa Stinnet of the Town of Canton.

On May 6, 2026, Mr. Brian Davis (NC Asbestos Inspector # 13453) performed the field survey of the Site. The location of each sample collected is depicted on Figure 1. The attached Table 1 describes each suspect ACM sampled, and Table 2 lists building materials confirmed to be asbestos containing (i.e., > 1% asbestos) or presumed to be asbestos containing.

2.0 SURVEY AREA

Survey Area	
Property Name / Occupant	Former Fire Station / Vacant
Property Street Address	21 Adams Street
County / City / State / Zip	Haywood County, Canton, North Carolina 28716
Desc. of Survey Area(s)	Interior and exterior of commercial building
Date of Construction	~1970

3.0 METHODOLOGY

The North Carolina Department of Health and Human Service (NCDHHS) administers the Asbestos Hazard Management Program under North Carolina General Statute 130A-444 through 452. Additionally, the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, Subpart M 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, asbestos-containing building materials are classified as either friable, Category I non-friable, or Category II non-friable ACM. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure.

The asbestos NESHAP requires that potentially regulated ACM (RACM) be identified, classified, and quantified prior to planned disturbances or demolition activities. In accordance with EPA’s NESHAPs, the “owner or operator of a demolition or renovation activity and prior to commencement of the demolition or renovation will thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos”.

The Occupational Safety and Health Administration (OSHA) Asbestos Standard for Construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers be maintained below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc). 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.

RACM must be removed prior to demolition activities which will disturb the ACM materials. The owner or operator must provide the NCDHHS with written notification of planned removal activities at least 10 working days prior to the commencement of asbestos abatement activities. Removal of RACM must be conducted by a State of North Carolina licensed asbestos abatement contractor.

The collected asbestos samples were placed into individual sample containers, sealed, and clearly labeled. Samples were submitted under strict Chain-of-Custody to a certified laboratory for analysis. Samples were analyzed by a National Institute of Standards and Technology (NIST) accredited laboratory via Polarized Light Microscopy (PLM) via EPA Method 600/M4-82-020 per 40 CFR 763.

4.0 SURVEY SUMMARY

The Site is improved with a vacant building which formerly operated as a fire station. The building consists of concrete masonry unit (CMU) block and brick masonry exterior walls constructed on a concrete slab-on-grade foundation. Interior features generally consist of CMU block walls, concrete floors and ceiling, vinyl composite (VCT) floor tiles, ceramic floor tiles, carpet, ceiling plaster, and ceiling tile. Roofing consists of thermoplastic polyolefin (TPO) membrane, foam, felt, and tar applied to wood framework on concrete decking.

BLE understands the structure is planned for demolition; therefore, an asbestos survey was performed to determine if ACMs are present.

During the survey, nineteen (19) distinct suspect ACMs were sampled and assessed for their condition and potential for disturbance. The following is a summary of the building materials assessed during this survey:

- Mastic
- Floor Tile
- Plaster Skim Coat
- Plaster Base Coat
- Ceiling Tile
- Paint
- Cove Base
- Caulk
- Membrane
- Tar
- Sealant
- Felt
- Tar Paper
- Insulation

Materials were assessed to be in good condition with a low potential for disturbance.

In addition, BLE observed and documented the presence of non-suspect asbestos containing materials, including, but not limited to: silicone, glass, metals, kiln brick, cement, fiberglass, concrete, pressed wood, cinder block, and rubber.



4.1 Presumed ACMs

No presumed ACMs were identified during this assessment.

5.0 CONCLUSIONS AND RECOMMENDATIONS


A total of forty-nine (49) PLM layers were analyzed by the laboratory during the course of this survey. Table 1 provides a summary of each material analyzed during this survey. **Table 2 summarizes the seven (7) confirmed ACMs identified during this assessment.** No presumed ACMs were identified during this survey.


Prior to renovation and/or demolition of the survey area, abatement of all ACMs is required by an appropriately licensed asbestos abatement contractor.

6.0 CERTIFICATIONS AND QUALIFICATIONS

This Asbestos Survey report describes the conditions of the area of investigation, as observed by the inspector at the time of the field survey. BLE relied upon information provided by the Client to clearly define the area of planned renovation and/or demolition to be inspected during the completion of this survey.

It is possible that additional suspect asbestos containing materials may exist at the Site, which may not have been observed during this investigation due to inaccessibility, safety limitations, or hidden behind or within other structural features. Should suspect ACMs be identified that were not assessed as part of this survey as noted in Table 1, further inspection by a certified asbestos inspector would be warranted prior to disturbing the material(s).

Building Inspector	Signature	Date of Survey	Certification #
Brian Davis		05/06/2026	13453

Senior Review	Signature	Date	Certification #
Daniel R. Matz, P.E.		05/13/2026	13439



ACM Survey: Pre-Demolition
21 Adams Street, Canton, North Carolina

May 13, 2026
BLE Project No. 26-29858.01

7.0 QUALIFICATION OF REPORT

The findings contained herein are based upon the data that was reviewed and documented in this report along with our experience on similar projects. The discovery of any additional information concerning the environmental conditions at the site should be reported to us for our review so that we can reassess potential environmental impacts and modify our recommendations, if necessary.

Sincerely,

BUNNELL LAMMONS ENGINEERING INC.

A handwritten signature in black ink that reads "Brian Davis". The signature is written in a cursive style with a large initial 'B'.

Brian Davis
Environmental Scientist
Certification#: 13453

A handwritten signature in blue ink that reads "Daniel R. Matz". The signature is written in a cursive style with a large initial 'D'.

Daniel R. Matz, P.E.
Senior Environmental Engineer
Certification#: 13439

Table 1: Suspect ACMs Surveyed					
Sample ID:	Material Desc.	Location	Quantity	Condition	% Asbestos
1 A-B	Yellow Mastic	First-floor southern room	110 SF	G	None Detected
2 A-B	Off-white Floor Tile Black Mastic	Second floor hallway and office area	850 SF	G	Off-white Floor Tile: Chrysotile 3% Black Mastic: Chrysotile 2%
3 A-C	White Plaster Skim Coat Gray Plaster Base Coat	Second floor bathroom ceilings	325 SF	G	None Detected
4 A-B	Yellow Mastic	Underneath carpet in sleeping quarters	1,200 SF	G	None Detected
5 A-B	White/beige Ceiling Tile	Second floor hallway	500 SF	G	None Detected
6 A-B	White/beige Ceiling Tile	Second floor office and lounge area	500 SF	G	None Detected
7 A-B	White Caulk	Window frames	180 LF	G	None Detected
8 A-B	Gray Mastic	Second floor vent	20 LF	G	None Detected
9 A-B	Black Cove Base Brown Mastic	Second floor hallway	120 LF	G	None Detected
10 A-B	Tan Mastic	Stairwells	200 SF	G	None Detected
11 A-B	Gray Membrane	Roof parapet	800 SF	G	None Detected
12 A-B	White Caulk	Roof penetrations	2 LF	G	None Detected
13 A-B	Beige Caulk	Exterior door frames	45 LF	G	Chrysotile 5%



Table 1: Suspect ACMs Surveyed					
Sample ID:	Material Desc.	Location	Quantity	Condition	% Asbestos
14 A-B	White/black Tar	Roof parapet wall seams	70 LF	G	Chrysotile 3%
15 A-B	Black Tar	Metal wall base on roof	50 SF	G	Chrysotile 5%
16 A-B	Silver Paint White Sealant	Roof HVAC system	500 SF	G	None Detected
17 A-B	Gray/yellow Felt Black Tar	Roof	2,800	G	None Detected
18 A-B	Black Tar Paper Yellow Mastic	Roof parapet walls	950 SF	G	Black Tar Paper: Chrysotile 15% Yellow Mastic: None Detected
19 A-B	Yellow Mastic Black Tar Brown Insulation	Base of HVAC unit and roof hatch	100 SF	G	Yellow Mastic: None Detected Black Tar: Chrysotile 10% Brown Insulation: None Detected

SF – Square feet

LF – Linear Feet

None Detected – <1% Asbestos



Table 2: Confirmed ACMs						
Sample ID:	Material Desc.	Location	Quantity¹	Condition²	Friable / Non-Friable²	% Asbestos
2 A-B	Off-white Floor Tile Black Mastic	Second floor hallway and office area	850 SF	G	Non-Friable	Off-white Floor Tile: Chrysotile 3% Black Mastic: Chrysotile 2%
13 A-B	Beige Caulk	Exterior door frames	45 LF	G	Non-Friable	Chrysotile 5%
14 A-B	White/black Tar	Roof parapet wall seams	70 LF	G	Non-Friable	Chrysotile 3%
15 A-B	Black Tar	Metal wall base on roof	50 SF	G	Non-Friable	Chrysotile 5%
18 A-B	Black Tar Paper	Roof parapet walls	950 SF	G	Non-Friable	Black Tar Paper: Chrysotile 15%
19 A-B	Black Tar	Base of HVAC unit and roof hatch	100 SF	G	Non-Friable	Black Tar: Chrysotile 10%

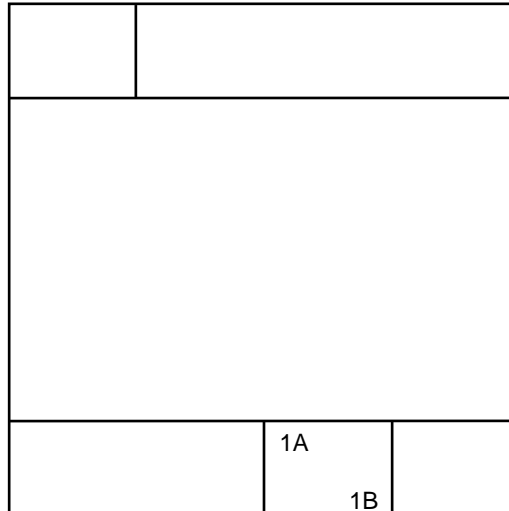
SF – Square feet
G – Good

LF – Linear Feet
D- Damaged

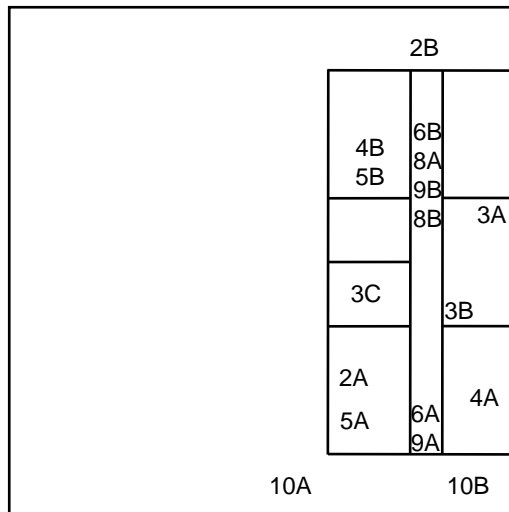
Chry – Chrysotile Asbestos
SD – Significantly Damaged

- Quantity reflects a gross estimate of suspect ACM/ACM present and should be confirmed by a contractor prior to abatement.
- The condition and friable/non-friable characteristics of each ACM is reported as observed by the Building Inspector at the time of the survey. If a non-friable ACM becomes damaged or significantly damaged prior to or during abatement, it would be considered friable and require abatement as a friable ACM, thus influencing the cost of abatement.

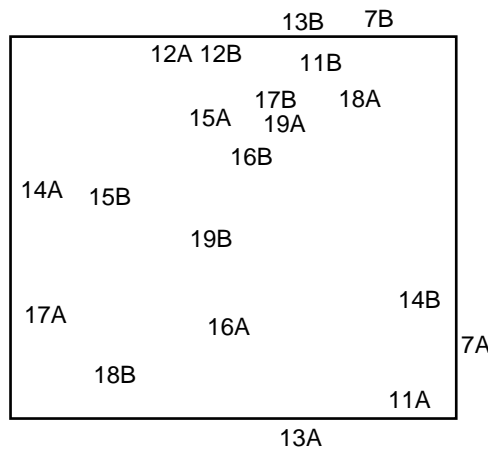
APPENDIX A
Figures



First Floor



Second Floor



Exterior

DRAWN: BPD	DATE: 05/07/2026
CHECKED: DRM	JOB No: 26-29858.01
APPROVED: DRM	

BLE | **BUNNELL
LAMMONS
ENGINEERING**

6004 Ponders Court, Greenville, SC 29615
Phone: (864) 288-1265

Sample Location Map

21 Adams Street
Canton, North Carolina

**FIGURE
1**

APPENDIX B
Photographs



Photo 1: View of the western side of the Site building.



Photo 2: View of the southern side of the Site building.



Photo 3: View of the eastern side of the Site building.



Photo 4: View of the northern side of the Site building.



Photo 5: View of the asbestos containing off-white floor tile and underlying black mastic in the second-floor hallway and office area.



Photo 6: View of the asbestos containing beige caulk on the exterior door frames.



Photo 7: View of asbestos containing white/black tar on the roof parapet wall seams.



Photo 8: View of the asbestos containing black tar on the metal wall base on the roof.



Photo 9: View of the asbestos containing black tar paper on the roof parapet walls.



Photo 10: View of the asbestos containing black tar on the base of the HVAC unit and roof hatch.

APPENDIX C
Laboratory Analytical Report(s)

May 13, 2026

Brian Davis
Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

CLIENT PROJECT: 26-29858.01, Adams Street
LAB CODE: 748732-1R

Dear Brian,

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on 05/08/26. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials and EPA 40 CFR Appendix E to Subpart E of Part 763: Interim Method of the Determination of Asbestos in Bulk Insulation Samples.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% by calibrated visual estimate.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Kamila Reichert,
Laboratory Director

NVLAP 600323-0



Built Environment Testing

ASBESTOS ANALYTICAL REPORT By: Polarized Light Microscopy

Prepared for

Bunnell-Lammons Engineering, Inc (BLE)

CLIENT PROJECT:	26-29858.01, Adams Street
LAB CODE:	748732-1R
TEST METHOD:	EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763
REPORT DATE:	05/13/26
TOTAL SAMPLES ANALYZED:	38
# SAMPLES >1% ASBESTOS:	7
TOTAL LAYERS ANALYZED:	49

Project: 26-29858.01, Adams Street

Lab Code: 748732-1R

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
1A	4420432		Yellow mastic	None Detected
1B	4420433		Yellow mastic	None Detected
2A	4420434		Off-white floor tile	Chrysotile 3%
2A (2)	4432035		Black mastic	Chrysotile 2%
2B	4420435		Sample Not Analyzed per Client Request	
3A	4420436	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
3B	4420437	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
3C	4420438	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
4A	4420439		Yellow mastic	None Detected
4B	4420440		Yellow mastic	None Detected
5A	4420441		White/beige ceiling tile	None Detected
5B	4420442		White/beige ceiling tile	None Detected
6A	4420443		White/beige ceiling tile	None Detected
6B	4420444		White/beige ceiling tile	None Detected
7A	4420445		White caulk	None Detected
7B	4420446		White caulk	None Detected
8A	4420447		Gray mastic	None Detected
8B	4420448		Gray mastic	None Detected
9A	4420449		Black cove base	None Detected
9A (2)	4432377		Brown mastic	None Detected
9B	4420450		Black cove base	None Detected
9B (2)	4432378		Brown mastic	None Detected
10A	4420451		Tan mastic	None Detected

Project: 26-29858.01, Adams Street

Lab Code: 748732-1R

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
10B	4420452		Tan mastic	None Detected
11A	4420453		Gray membrane	None Detected
11B	4420454		Gray membrane	None Detected
12A	4420455		White caulk	None Detected
12B	4420456		White caulk	None Detected
13A	4420457		Beige caulk	Chrysotile 5%
13B	4420458		Sample Not Analyzed per Client Request	
14A	4420459		White/black tar	Chrysotile 3%
14B	4420460		Sample Not Analyzed per Client Request	
15A	4420461		Black tar	Chrysotile 5%
15B	4420462		Sample Not Analyzed per Client Request	
16A	4420463	Layer A	Silver paint	None Detected
		Layer B	White sealant	None Detected
16B	4420464	Layer A	Silver paint	None Detected
		Layer B	White sealant	None Detected
17A	4420465	Layer A	Gray/yellow felt	None Detected
		Layer B	Black tar	None Detected
17B	4420466	Layer A	Gray/yellow felt	None Detected
		Layer B	Black tar	None Detected
18A	4420467	Layer A	Black tar paper	Chrysotile 15%
		Layer B	Yellow mastic	None Detected
18B	4420468	Layer A	Layer Not Analyzed	
		Layer B	Yellow mastic	None Detected
19A	4420469	Layer A	Yellow mastic	None Detected
		Layer B	Black tar	Chrysotile 10%
		Layer C	Brown insulation	None Detected

Project: 26-29858.01, Adams Street

Lab Code: 748732-1R

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
19B	4420470	Layer A	Yellow mastic	None Detected
		Layer B	Layer Not Analyzed	
		Layer C	Brown insulation	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
1A 4420432	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected
1B 4420433	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected
2A 4420434	Floor Tile	Homogeneous Off-white Non-Fibrous Bound	97%	Vinyl	Chrysotile 3%
2A (2) 4432035	Mastic	Homogeneous Black Non-Fibrous Bound	98%	Tar	Chrysotile 2%
2B 4420435	Sample Not Analyzed per Client Request				
3A Layer A 4420436	Plaster Skim Coat	Heterogeneous White Non-Fibrous Bound	60% 35% 5%	Binder Silica Paint	None Detected
Layer B 4420436	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	80% 20%	Binder Perlite	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS			ASBESTOS	
Lab ID	Description	Attributes	Fibrous	Non-Fibrous		%	
3B Layer A 4420437	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected		
		White	35%	Silica			
		Non-Fibrous Bound	5%	Paint			

Layer B 4420437	Plaster Base Coat	Homogeneous	80%	Binder	None Detected		
		Gray	20%	Perlite			
		Non-Fibrous Bound					

3C Layer A 4420438	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected		
		White	35%	Silica			
		Non-Fibrous Bound	5%	Paint			

Layer B 4420438	Plaster Base Coat	Homogeneous	80%	Binder	None Detected		
		Gray	20%	Perlite			
		Non-Fibrous Bound					

4A 4420439	Mastic	Homogeneous	100%	Mastic	None Detected		
		Yellow					
		Non-Fibrous Bound					

4B 4420440	Mastic	Homogeneous	100%	Mastic	None Detected		
		Yellow					
		Non-Fibrous Bound					

5A 4420441	Ceiling Tile	Heterogeneous	60%	Cellulose	15%	Perlite	None Detected
		White/beige	20%	Glass	5%	Paint	
		Fibrous					
		Loosely Bound					

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
5B 4420442	Ceiling Tile	Heterogeneous	60%	Cellulose	15%	None Detected
		White/beige	20%	Glass	5%	
		Fibrous				
		Loosely Bound				
6A 4420443	Ceiling Tile	Heterogeneous	60%	Cellulose	15%	None Detected
		White/beige	20%	Glass	5%	
		Fibrous				
		Loosely Bound				
6B 4420444	Ceiling Tile	Heterogeneous	60%	Cellulose	15%	None Detected
		White/beige	20%	Glass	5%	
		Fibrous				
		Loosely Bound				
7A 4420445	Caulk	Homogeneous			100%	None Detected
		White				
		Non-Fibrous Bound				
7B 4420446	Caulk	Homogeneous			100%	None Detected
		White				
		Non-Fibrous Bound				
8A 4420447	Mastic	Homogeneous			100%	None Detected
		Gray				
		Non-Fibrous Bound				
8B 4420448	Mastic	Homogeneous			100%	None Detected
		Gray				
		Non-Fibrous Bound				

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
9A 4420449	Cove Base	Homogeneous Black Non-Fibrous Bound	100%	Rubber		None Detected
9A (2) 4432377	Mastic	Homogeneous Brown Non-Fibrous Bound	100%	Mastic		None Detected
9B 4420450	Cove Base	Homogeneous Black Non-Fibrous Bound	100%	Rubber		None Detected
9B (2) 4432378	Mastic	Homogeneous Brown Non-Fibrous Bound	100%	Mastic		None Detected
10A 4420451	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic		None Detected
10B 4420452	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic		None Detected
11A 4420453	Membrane	Homogeneous Gray Fibrous Bound	20%	Synthetics	80%	Rubber None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %	
			Fibrous	Non-Fibrous			
11B 4420454	Membrane	Homogeneous Gray Fibrous Bound	20%	Synthetics	80%	Rubber	None Detected
12A 4420455	Caulk	Homogeneous White Non-Fibrous Bound			100%	Caulk	None Detected
12B 4420456	Caulk	Homogeneous White Non-Fibrous Bound			100%	Caulk	None Detected
13A 4420457	Caulk	Heterogeneous Beige Non-Fibrous Bound			90% 5%	Caulk Paint	Chrysotile 5%
13B 4420458		Sample Not Analyzed per Client Request					
14A 4420459	Tar	Heterogeneous White/black Non-Fibrous Bound			92% 5%	Tar Paint	Chrysotile 3%
No caulk present. Sample appears to be tar.							
14B 4420460		Sample Not Analyzed per Client Request					
15A 4420461	Tar	Homogeneous Black Non-Fibrous Bound			95%	Tar	Chrysotile 5%

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
15B 4420462		Sample Not Analyzed per Client Request				
16A Layer A 4420463	Paint	Homogeneous Silver Non-Fibrous Bound	75% 25%	Paint Tar	None Detected	
Layer B 4420463	Sealant	Homogeneous White Non-Fibrous Bound	100%	Caulk	None Detected	
16B Layer A 4420464	Paint	Homogeneous Silver Non-Fibrous Bound	75% 25%	Paint Tar	None Detected	
Layer B 4420464	Sealant	Homogeneous White Non-Fibrous Bound	100%	Caulk	None Detected	
17A Layer A 4420465	Felt	Heterogeneous Gray/yellow Fibrous Bound	10% 5%	Cellulose Glass	85%	Foam None Detected
Layer B 4420465	Tar	Homogeneous Black Fibrous Bound	15%	Cellulose	85%	Tar None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
17B Layer A 4420466	Felt	Heterogeneous	10%	Cellulose	85%	Foam None Detected
		Gray/yellow Fibrous Bound	5%	Glass		
Layer B 4420466	Tar	Homogeneous Black Fibrous Bound	15%	Cellulose	85%	Tar None Detected
18A Layer A 4420467	Tar Paper	Homogeneous	55%	Cellulose	30%	Tar Chrysotile 15%
		Black Fibrous Bound				
Layer B 4420467	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic None Detected
18B Layer A 4420468	Tar Paper	Layer Not Analyzed per Client Request				
Layer B 4420468	Mastic	Homogeneous Yellow Non-Fibrous Bound			100%	Mastic None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748732-1R
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Adams Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %	
			Fibrous	Non-Fibrous			
19A Layer A 4420469	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic		None Detected	
Layer B 4420469	Tar	Homogeneous Black Non-Fibrous Bound	90%	Tar		Chrysotile 10%	
Layer C 4420469	Insulation	Homogeneous Brown Fibrous Loosely Bound	85%	Cellulose	15%	Perlite	None Detected
19B Layer A 4420470	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic		None Detected	
Layer B 4420470	Tar	Layer Not Analyzed per Client Request					
Layer C 4420470	Insulation	Homogeneous Brown Fibrous Loosely Bound	85%	Cellulose	15%	Perlite	None Detected

LEGEND:

Non-Anth = Non-Asbestiform Anthophyllite
Non-Trem = Non-Asbestiform Tremolite
Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

REPORTING LIMIT: 1% by calibrated visual estimation

REGULATORY LIMIT: 1%

Due to the limitations of the EPA 600 / R93 / 116 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. Estimated measurement of uncertainty is available on request.

Eurofins Built Environment Testing East, LLC makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins Built Environment Testing East, LLC. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

Information provided by customer includes customer sample ID and sample description.

This report contains revisions from the previous version, as requested by the client, which may include Project #/P.O. #, Project Description, or Client ID Number. All changes are identified with an ^R next to all modified fields.



Olivia Gardner
Analyst

DATA QA:



Raegan Brown
5/12/2026

APPROVED BY:



Kamila Reichert,
Laboratory Director

Table 1: Suspect ACMs Surveyed

Sample ID:	Material Desc.
1 A-B	Mastic
2 A-B	Floor Tile Mastic
3 A-C	White Plaster Skim Coat Gray Plaster Base Coat
4 A-B	Mastic
5 A-B	Ceiling Tile
6 A-B	Ceiling Tile
7 A-B	Caulk
8 A-B	Mastic
9 A-B	Cove Base and mastic
10 A-B	Mastic
11 A-B	Membrane
12 A-B	Caulk
13 A-B	Caulk
14 A-B	Caulk
15 A-B	Tar
16 A-B	Sealant
17 A-B	Felt Tar
18 A-B	Tar
19 A-C	Tar

APPENDIX D
Professional Qualifications



Brian P Davis
823 S Church St Apt 1530
Greenville, SC 29601

149573

**North Carolina
Asbestos Accreditation**

EXPIRATION			
DOB	SEX	HT	WT
09-22-1992	M	5'6"	145
CLASS	#	EXP	
INSPECTOR	13453	07-26	



Daniel Robert Matz
448 Crepe Myrtle Dr
Greer, SC 29651

North Carolina Asbestos Accreditation			
EXPIRATION			
DOB	SEX	HT	WT
10-29-1984	M	5'10"	150
CLASS	#	EXP	
INSPECTOR	13439	07-26	

149572

APPENDIX E
Geoenvironmental Report

IMPORTANT INFORMATION ABOUT THIS

GEOENVIRONMENTAL REPORT

Geoenvironmental assessments along with the resulting report are commissioned to gain information about environmental conditions in, on, at, and/or beneath the surface of a site. Geoenvironmental reports are commonly prepared during due diligence activities and may be known in the environmental community as, *Phase II Environmental Site Assessments, Limited Soil and/or Groundwater Assessments, etc.*

The more comprehensive the study, the more reliable the assessment is likely to be. However, no matter how much data or information is gathered about a site, risks created by unanticipated conditions will always remain. Work with your geoenvironmental consultant to manage known and unknown risks. Part of that process should already have been accomplished, through the risk allocation provisions you and your geoenvironmental professional discussed and included in your contract's general terms and conditions. This document is intended to explain some of the concepts that may be included in your agreement, and to pass along information and suggestions to help you manage your risk.

Beware of Change; Keep Your Geoenvironmental Professional Advised

The design of a geoenvironmental study considers a variety of factors that are subject to change. Changes can undermine the applicability of a report's findings, conclusions, and recommendations. *It is our responsibility to advise your geoenvironmental professional about any changes you become aware of.* Geoenvironmental professionals cannot accept responsibility or liability for problems that occur because a report fails to consider conditions that did not exist when the study was initiated. Ask your geoenvironmental professional about the types of changes you should be particularly alert to. Some of the most common include:

- modification of the proposed development or ownership group,
- sale or other property transfer,
- replacement of or additions to the financing entity(s),
- amendment of existing regulations or introduction of new ones, or
- changes in the use or condition of adjacent property.

Should you become aware of any change, do not rely on a geoenvironmental report. Advise your geoenvironmental professional immediately; follow the professional's advice.

Recognize the Impact of Time

A geoenvironmental professional's findings, recommendations, and/or conclusions cannot remain valid indefinitely. The more time that passes, the more likely it is that important latent changes will occur. *Do not rely on a geoenvironmental report if too much time has elapsed since it was completed.* Ask your environmental professional to define "too much time."

Prepare to Deal with Unanticipated Conditions

The findings, recommendations, and/or conclusions of a geoenvironmental report typically are based on a review of historical information, interviews, a site "walkover," and other forms of noninvasive research to develop a geoenvironmental scope of work. When site subsurface conditions are not sampled in any way, the risk of unanticipated conditions is higher than it would otherwise be.

While borings, installation of monitoring wells, and similar invasive test methods can help reduce the risk of unanticipated conditions, do not overvalue the effectiveness of testing. Testing provides information about actual conditions only at the precise locations where samples are taken, and only when they are taken. Your geoenvironmental professional has applied that specific information to develop a general opinion about environmental conditions. *Actual conditions in areas not sampled may differ (sometimes sharply) from those predicted in a report.* For example, a site may contain an unregistered underground storage tank that shows no surface trace of its existence. *Even conditions in areas that were tested can change, sometimes suddenly, due to any number of events, not the least of which include occurrences at adjacent sites.* Recognize, too, that *even some conditions in tested areas may go undiscovered,* because the tests or analytical methods used were designed to detect only those conditions assumed to exist.

Do Not Permit Any Other Party to Rely on the Report

Geoenvironmental professionals perform studies and prepare their reports to meet the specific needs and goals of the clients who retain them, in light of the risk management methods that the client and geoenvironmental professional agree to, and the statutory, regulatory, or other requirements that apply. A study prepared to meet one client's goals might not meet the goals for another client or third party. *Unless the report specifically states otherwise, it was developed for you and only you.* Do not unilaterally permit any other party to rely on it. The report and the study underlying it may not be adequate for another party's needs or goals, and you could be held liable for shortcomings your geoenvironmental professional was powerless to prevent or anticipate. Inform your geoenvironmental professional when you know or expect that someone else—a third-party—will want to use or rely on the report. *Do not permit third-party use or reliance until you first confer with the geoenvironmental professional who prepared the report.* Additional testing, analysis, or study may be required and, in any event, appropriate terms and conditions should be agreed to so both you and your geoenvironmental professional are protected from third-party risks. *Any party who relies on a geoenvironmental report without the express written permission of the professional who prepared it and the client for whom it was prepared may be solely liable for any problems that arise.*

Avoid Misinterpretation of the Report

Design professionals and other parties may want to rely on the report in developing plans and specifications. They need to be advised, in writing, that their needs may not have been considered when the study's scope was developed, and, even if their needs were considered, they might misinterpret geoenvironmental findings, conclusions, and/or recommendations. *Your geoenvironmental professional may be further retained to explain pertinent elements of the report to others who are permitted to rely on it, or to review plans, specifications or other instruments of professional service that*

incorporate any of the report's findings, conclusions, or recommendations. Your geoenvironmental professional has the best understanding of the issues involved, including the fundamental assumptions for which the project scope was developed.

Give Contractors Access to the Report

To reduce the risk of delays, claims, and disputes, it may be prudent to give contractors access to the full report, *providing that it is accompanied by a letter of transmittal that can protect you* by making it unquestionably clear that: 1) the study was not conducted and the report was not prepared for purposes of bid development, and 2) the findings, conclusions, and/or recommendations included in the report are based on a variety of opinions, inferences, and assumptions and are subject to interpretation. Use the letter to also advise contractors to consult with your geoenvironmental professional to obtain clarifications, interpretations, and guidance (a fee may be required for this service), and that—in any event—they should conduct additional studies to obtain the specific type and extent of information each prefers for preparing a bid or cost estimate. Providing access to the full report, with the appropriate caveats, helps prevent formation of adversarial attitudes and claims of concealed or differing conditions. If a contractor elects to ignore the warnings and advice in the letter of transmittal, it would do so at its own risk. Your geoenvironmental professional should be able to help you prepare an effective letter.

Do Not Separate Documentation from the Report

Geoenvironmental reports often include supplemental documentation, such as maps and copies of regulatory files, permits, registrations, citations, and/or correspondence with regulatory agencies. If subsurface explorations were performed, the report may contain final boring logs or copies of laboratory data. If remediation activities occurred on site, the report may include: copies of daily field reports; waste manifests; information about the disturbance of subsurface materials, the type and thickness of any fill placed on site, and fill placement practices, laboratory reports, among other types of documentation. It is not advisable to separate supplemental documentation from the report.

Understand the Role of Standards

Unless they are incorporated into statutes or regulations, standard practices and standard guides developed by the American Society for Testing and Materials (ASTM) and other recognized standards-developing organizations (SDOs) are little more than aspirational methods agreed to by a consensus of a committee. The committees that develop standards may not comprise those best-qualified to establish methods and, no matter what, no standard method can possibly consider the infinite client- and project-specific variables that fly in the face of the theoretical “standard conditions” to which standard practices and standard guides apply. In fact, these variables can be so pronounced that geoenvironmental professionals who comply with every directive of an ASTM or other standard procedure could run afoul of local custom and practice, thus violating the standard of care.

Accordingly, when geoenvironmental professionals indicate in their reports that they have performed a service “in general compliance” with one standard or another, it means they have applied professional judgment

in creating and implementing a scope of service designed and performed for the specific client and project involved, and which follows some of the general precepts laid out in a referenced standard. To the extent that a report indicates “general compliance” with a standard, you may wish to speak with your geoenvironmental professional to learn more about what was and was not done.

Realize That Recommendations May Not Be Final

When provided, technical recommendations included in a geoenvironmental report are based on assumptions about actual conditions at the time of the study. The findings, conclusions, and/or recommendations are often as good as the readily available and reasonably ascertainable information, and also based on the geoenvironmental professionals' understanding of the User's needs and goals. Final recommendations can be prepared only by observing actual conditions as they are exposed. For that reason, it may be prudent to retain the geoenvironmental professional of record to observe construction and/or remediation activities on site, or to permit rapid response to unanticipated conditions. *The geoenvironmental professional who prepared the report cannot assume responsibility or liability for the report's recommendations if that professional is not retained to observe relevant site operations.*

Understand That Geotechnical Issues Have Not Been Addressed

Unless geotechnical engineering was specifically included in the scope of professional service, a geoenvironmental report is not likely to relate any pertinent findings, conclusions, or recommendations about the suitability of subsurface materials for construction purposes, especially if site remediation has been accomplished through the removal, replacement, encapsulation, or chemical treatment of on-site media (i.e., soil, groundwater, soil gas). If you plan to build on the subject site but have not yet had a geotechnical engineering study conducted, your geoenvironmental professional should be able to provide guidance about the next steps you should take. The same firm may provide the services you need.

Read Responsibility Provisions Closely

Geoenvironmental studies cannot be exact; they are based on professional judgment and opinion. Nonetheless, some clients, contractors, and others assume geoenvironmental reports are or should be unerringly precise. Such assumptions have created unrealistic expectations that have led to wholly unwarranted claims and disputes. To help prevent such problems, geoenvironmental professionals have developed a number of report provisions and contract terms that explain who is responsible for what, and how risks are to be allocated. Some people mistake these for “exculpatory clauses,” that is, provisions whose purpose is to transfer one party's rightful responsibilities and liabilities to someone else. Read the responsibility provisions included in a report and in the contract you and your geoenvironmental professional agreed to. *Responsibility provisions are not “boilerplate.”* They are important.

May 13, 2026

Town of Canton
C/o: Ms. Lisa Stinnett
85 Summer Street
Canton, North Carolina 28716

Subject: Lead-Based Paint Assessment
21 Adams Street
Canton, North Carolina 28716
BLE Project Number 26-29858.02

Dear Ms. Stinnett,

Bunnell-Lammons Engineering, Inc. (BLE) facilitated the completion of a Lead-Based Paint (LBP) Assessment at the above-referenced property, herein referred to as “Site.” The LBP Assessment was performed in accordance with our Proposal No. 26-29858 dated April 28, 2026. This LBP Assessment was performed for Occupational Safety and Health Administration (OSHA) purposes prior to planned demolition activities on-Site.

On May 6, 2026, BLE representatives facilitated the performance of an LBP Assessment using an X-ray Fluorescence Spectrum Analyzer (XRF) to assess the potential presence of LBPs on painted surfaces associated with the Site building. Painted surfaces were selected based on the color of the topcoat, underlying layers, and substrate on which it was painted. Readings exceeding 1.0-milligrams per centimeter squared (mg/cm^2) are considered lead-based coatings as defined by the North Carolina Department of Health and Human Service (NCDHHS). Readings below the LBP threshold of $1.0 \text{ mg}/\text{cm}^2$ are considered to have lead-containing substrates.

The following provides a summary of LBP identified during this assessment:

- The green metal wind barrier on the roof
- The black metal handrails in both stairways.
- The white metal sinks in the bathrooms.
- The black metal roof access ladder in the stairway.

The complete *Lead-Based Paint Survey* report is attached as part of this letter. The confirmed LBP materials identified during this assessment should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Additionally, OSHA contractor requirements exist, and efforts should be made to prevent the potential spread and exposure of lead to the workers and the public during demolition activities. OSHA Lead Regulations do not recognize a threshold concentration of lead-paint for definition purposes. Rather, OSHA only recognizes the presence or absence of lead in defining lead containing materials. This OSHA regulation also establishes exposure levels to employees of airborne lead. The current OSHA regulations recognize an airborne Action Level of 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and a Permissible Exposure Level (PEL) of $50 \mu\text{g}/\text{m}^3$ per 8-hour work day for employees. The full OSHA lead standard should be referenced for compliance.



Lead-Based Paint Assessment
21 Adams Street, Canton, NC

May 13, 2026
BLE Job Number 26-29858.02

BLE appreciates the opportunity to support your geotechnical, environmental, and construction materials testing needs. Please contact us (864) 288-1265 if you have any questions.

Sincerely,

BUNNELL-LAMMONS ENGINEERING INC.

A handwritten signature in blue ink that reads "Brian Davis".

Brian Davis
Environmental Scientist

A handwritten signature in blue ink that reads "Daniel R. Matz".

Daniel R. Matz, P.E.
Senior Environmental Engineer

Attachments: *Lead-Based Paint Survey – Former Fire Station – 21 Adams Street*, prepared by Oliver Environmental Solutions, dated May 12, 2026

Lead-Based Paint Survey
Former Fire Station



Lead Based Paint Survey

Former Fire Station
21 Adams Street
Canton, North Carolina 28716

Prepared for:
Mr. Brian Davis
BLE Corp
6004 Ponders Court
Greenville, South Carolina 29615

Prepared by:
Oliver Environmental Solutions, LLC
302 Gray Fox Square
Taylors, South Carolina 29687

Project Number: 260451

May 12, 2026

Mr. Brian Davis
BLE Corp.
6004 Ponders Court
Greenville, South Carolina 29615

Reference: Lead Based Paint Survey
Former Fire Station
21 Adams Street
Canton, North Carolina 28716

Dear Mr. Davis:

Oliver Environmental Solutions, LLC has completed a lead-based paint (LBP) survey at the above-referenced property. The survey did not include demolition, such as jack/sledge hammering or cutting into walls, ceilings, floors, or structural members to expose possible Lead-Based Paint (LBP). Included in this report is a summary of our field activities and the results obtained.

PROJECT INFORMATION

The project area includes the former Fire Station located at 21 Adams Street in Canton, North Carolina. The two-story building is approximately 5,600 SF and was originally constructed circa 1970. The former Fire Station referenced above is slated for demolition and is not considered “*target housing*” or “*child occupied facilities*” as per HUD guidelines and EPA and North Carolina Department of Health and Human Services (NCDHHS), Health Hazards Control Unit (HHCU), Lead Based Paint Management Program Renovation, Repair and Painting (RRP) lead regulations. Oliver Environmental Solutions, LLC provided an LBP survey throughout the interior and exterior of the building for demolition and waste stream disposal and OSHA informational purposes. Included in this report is a summary of our field activities and the results obtained.

The objectives of the survey included the following:

- The LBP survey was performed for demolition and waste stream disposal and OSHA informational purposes by an EPA lead certified firm and EPA certified LBP risk assessor in general accordance with the EPA’s RRP Lead Program regulations and HUD guidelines and methodologies for inspection protocols.
- Identification of building components and surfaces that are coated, painted, stained, varnished, shellacked or otherwise coated throughout the interior and exterior areas of the building. Coated surfaces were evaluated based on the color of the topcoat, the underlying layers, age of construction and/or the substrate on which the paint is applied.
- In situ analysis of suspected LBPs using a X-ray Fluorescence Spectrum Analyzer (XRF) technology.
- Presenting the results in a report identifying confirmed LBPs.

METHODS

The LBP survey was completed using a SciAps X-550Pb XRF (S/N 02211) and was performed in accordance with Performance Characteristic Sheet (PCS) specifications and NIST calibration

standards per HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing published in June 1995 (Chapter 7 updated in 2012) and EPA RRP lead regulations.

The LBP survey was performed by Mr. Tom Oliver (EPA LBP Risk Assessor License No. LBP-R-36342-3; Expiration Date 01/04/2027) with Oliver Environmental Solutions, LLC (EPA Lead Firm Certification No. LBP-F312078-1; Expiration Date 10/30/2028) on May 6, 2026. Surfaces that were coated, painted, stained, varnished and shellacked were selected based on estimated age of construction, color of topcoat, underlying layers and substrate on which it was painted.

The building is slated for demolition, therefore, EPA and NCDHHS RRP lead regulations do not apply to this project.

RESULTS

Surfaces were analyzed by XRF throughout the interior and exterior of the building for the presence of LBP. Currently, NCDHHS defines XRF readings on substrates equal to or in excess of 1.0 mg/cm² and 0.5% weight or greater for paint chips are considered to be LBP. Readings below the LBP thresholds are considered to have lead-containing substrates.

LBP should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Similar precautions should be used on substrates with detectable levels of lead. *XRF LBP Data Tables* are included in Appendix I of this report and identifies materials coated with LBP. XRF results indicate the surfaces presented below are considered LBP:

The following surfaces in the structure tested positive for lead in excess of the regulatory definition of 1.0 mg/cm²:

Sample #	Location of LBP	Description of LBP	Photograph #
24	Roof	Green Metal Wind Barrier	2
34	Both Stairways	Black Metal Hand Rails	3
93	Bathrooms	White metal Sinks	4,5
121	Stairway	Black Metal Roof Access Ladder	6

CONCLUSIONS

Several surfaces in the building were identified to be coated with LBP.

The building is a commercial property and will be demolished. Subsequently, it is not considered to be pre-1978 “*target housing*” or a “*child-occupied facility*” as defined by EPA and NCDHHS RRP lead regulations. Subsequently, the RRP lead regulations do not apply to this project. However, OSHA and disposal requirements exist during demolition.

Occupational Safety and Health Administration (OSHA) Lead Regulations apply to actions initiated on LBP and lead containing materials performed by workers as a course of their job duties. This regulation applies to LBP and detectable lead concentrations since OSHA does not

recognize a threshold level of lead for definition purposes, only the presence or absence of lead. This regulation sets exposure levels on airborne lead and does not reference the percent lead in paint. Therefore, initial personal air monitoring should be conducted on workers performing work on surfaces which have a detectable lead concentration to satisfy the OSHA requirements. The current OSHA regulations recognize an airborne action level of thirty micrograms per cubic meter ($30 \mu\text{g}/\text{m}^3$) during an eight-hour workday and a permissible exposure level of fifty micrograms per cubic meter ($50 \mu\text{g}/\text{m}^3$) for employees. If a baseline exposure lower than the OSHA Action Level of $30 \mu\text{g}/\text{m}^3$ is established, personal air monitoring may be terminated. The full OSHA lead standard (29 CFR 1926.62) should be referenced for compliance.

LBP and materials containing LBP should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Additionally, LBP materials should be maintained and kept in good condition to prevent paint deterioration and potential dust exposure. Routine cleaning, proper disposal of visible paint chips and visual monitoring for non-intact LBP should be implemented. Similar precautions should be used on substrates with detectable levels of lead. Prohibited practices on LBP during activities that could disturb LBP or "lead containing" substrates include:

- Open flame burning or torching (includes propane-fueled heat grids).
- Machine sanding or grinding without HEPA local vacuum exhaust tool.
- Abrasive blasting or sandblasting without HEPA local vacuum exhaust tool.
- Heat guns operating above 1100°F or charring the paint.
- Dry scraping.
- Paint stripping in a poorly ventilated space using volatile stripper.

RECOMMENDATIONS

The former Fire Station building is slated for demolition and the EPA and NCDHHS RRP lead regulations do not apply to this project. Demolition may proceed with consideration of Occupational Safety and Health Administration (OSHA) lead regulations and disposal requirements. Oliver Environmental Solutions, LLC recommends the following:

- Follow OSHA regulation 29 CFR 1926.62 during demolition activities.
- Metal sinks and the roof access ladder be disposed of in a North Carolina Construction & Demolition (C&D) Landfill or recycled at a scrap metal recycling facility. However, the landfill and/or recycling facility should be contacted to determine their specific disposal/recycling requirements.

Please note that this document is not a specification for lead removal. It does not contain means and methods for abatement. If you are planning a lead-based paint abatement project, please contact Oliver Environmental Solutions, LLC to discuss the requirements. Use of this document without the express written consent of Oliver Environmental Solutions, LLC is at the sole risk of the user and/or abatement contractor. **Contractors must verify material amounts prior to bidding or removal.** This report summarizes our evaluation of the conditions observed at the site.

The findings prepared by Oliver Environmental Solutions, LLC are based upon testing performed in the project building. Additional LBP may exist (undetected) in other areas due to their inaccessibility or due to the limited nature of our testing. Our survey procedures and recommendations are based on the guidelines presented in EPA, NCDHHS or OSHA regulations.

If you have questions, comments or concerns about this proposal or anything else, please reach out to me at (864) 640-5127 or at tomoliverenv@outlook.com. Thank you for this opportunity to be a part of your project and I look forward to our continued relationship.

Respectfully submitted,
OLIVER ENVIRONMENTAL SOLUTIONS, LLC



Tom Oliver
President

Appendix I	XRF LBP Data Tables
Appendix II	Photographic Log
Appendix III	EPA LBP Firm & Risk Assessor Certification
Appendix IV	XRF PCS Documentation

APPENDIX I
XRF LBP DATA TABLES

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Fire Station LBP Survey

Sampled By: Tom Oliver

Project Location: 21 Adams Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
1		Calibration			1.0
2		Calibration			1.1
3		Calibration			1.1
4	Exterior	Wall/siding	Brown	Brick	0.0
5	Exterior	Roll up door	Silver	Metal	0.0
6	Exterior	Roll up door column	White	Concrete	0.0
7	Exterior	Roll up door lintel	White	Concrete	0.0
8	Exterior	Wall siding	Brown	Brick	0.0
9	Exterior	Wall siding door	Tan	Metal	0.4
10	Exterior	Wall siding frame	Tan	Metal	0.0
11	Exterior	Wall siding awning	Tan	Concrete	0.0
12	Exterior	Wall above door	Tan	Concrete	0.0
13	Exterior	Wall	Tan	Brick	0.0
14	Exterior	Door	Tan	Metal	0.0
15	Exterior	Door frame	Tan	Metal	0.0
16	Exterior	Door awning	Tan	Concrete	0.0
17	Exterior	Wall above door	Tan	Concrete	0.0
18	Exterior	Window	White	Metal	0.0
19	Exterior	Window sill	White	Metal wrap	0.0
20	Exterior	Window sill	White	Metal wrap	0.0
21	Exterior	Window	White	Metal	0.0
22	Exterior	Window	White	Metal	0.0
23	Exterior	Window	White	Metal	0.0
24	Roof	HVAC wind barrier	Green	Metal	1.1
25	Roof	Roof edge	White	Concrete	0.0

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Fire Station LBP Survey

Sampled By: Tom Oliver

Project Location: 21 Adams Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm ²)
26	2nd Floor Stairway	Door	Black	Metal	0.0
27		Door frame	Black	Metal	0.1
28		Upper wall	White	CMU block	0.0
29		Lower wall	Green	CMU block	0.0
30		Floor	Gray	Concrete	0.0
31		Stair tread	Gray	Vinyl	0.0
32		Stair riser	Black	Metal	0.0
33		Stair stringer	Black	Metal	0.0
34		Stair hand rail	Black	Metal	1.8
35		Storage cage	Black	Metal	0.0
36		Ceiling	Black	Metal	0.1
37		Door	Black	Metal	0.0
38		Door frame	Black	Metal	0.1
39		Ceiling trim	Black	Metal	0.2
40		Fire Truck Area	Ceiling	White	Concrete
41	Upper wall		White	CMU block	0.0
42	Lower wall		Blue	CMU block	0.0
43	Lower wall		Green	CMU block	0.0
44	Floor		Gray	Concrete	0.0
45	Floor		White	Concrete	0.0
46	Floor		Orange	Concrete	0.0
47	Roll up door column		White	Concrete	0.0
48	Door		Black	Metal	0.0
49	Door frame		Black	Metal	0.0
50	Door frame		Black	Metal	0.1

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Fire Station LBP Survey

Sampled By: Tom Oliver

Project Location: 21 Adams Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm ²)
51	Fire Truck Area side rooms	Upper wall	White	CMU block	0.0
52		Door	Black	Metal	0.0
53		Door frame	Black	Metal	0.0
54		Wall lower	Blue	CMU block	0.0
55		Floor	Black	Concrete	0.0
56		Wall lower	Green	CMU block	0.0
57	2nd Floor Break Area	Ceiling	White	Concrete	0.0
58		Ceiling grid	White	Metal	0.0
59		Wall	White	CMU block	0.0
60		Floor	White	VCT tile	0.0
61		Wall cabinet	White	Wood	0.0
62		Lower cabinet	Blue	Wood	0.0
63		Counter top	White	Wood	0.0
64		Window	White	Metal	0.0
65		Window	White	Metal	0.0
66		Window sill	White	Concrete	0.0
67		Window sill	White	Concrete	0.0
68		Window apron	White	Concrete	0.1
69		Window apron	White	Concrete	0.1
70		Door	Brown	Concrete	0.0
71		Door frame	Black	Metal	0.1
72		Wall cabinet	Blue	Wood	0.0
73		Water fountain	Silver	Metal	0.0
74		Counter top	Tan	Wood	0.0
75		Beam window	White	Concrete	0.0

FIELD DATA SHEET XRF LBP ANALYSIS

Project Name: BLE Former Fire Station LBP Survey

Sampled By: Tom Oliver

Project Location: 21 Adams Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm ²)
76	2nd Floor Bedroom 1	Ceiling	White	Concrete	0.0
77		Wall	White	CMU block	0.0
78		Window	White	Metal	0.0
79		Window sill	White	Concrete	0.0
80		Window apron	White	Concrete	0.0
81		Floor	Black	Carpet	0.0
82		Door	Brown	Wood	0.0
83		Door frame	Black	Metal	0.1
84		Beam across window	White	Concrete	0.0
85		HVAC duct	White	Metal	0.0
86		2nd Floor Bathroom	Ceiling	White	Concrete/plaster
87	Wall		White	CMU block	0.0
88	Floor		Tan	Ceramic tile	0.0
89	Kickplate		Gray	Ceramic tile	0.4
90	Wall		Gray	Ceramic tile	0.5
91	Closet		Gray	Wood	0.5
92	Stall		Tan	Metal	0.0
93	Sink		White	Metal	6.7
94	Urinal		White	Porcelain	0.0
95	Toilet		White	Porcelain	0.0
96	Door		Brown	Wood	0.0
97	Door frame	Black	Metal	0.1	
98	2nd Floor Bedroom 2	Ceiling	White	Concrete	0.0
99		Wall	White	CMU block	0.0
100		Floor	Black	Carpet	0.0

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Fire Station LBP Survey

Sampled By: Tom Oliver

Project Location: 21 Adams Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
101	2nd Floor Bedroom 2	Window	White	Metal	0.0
102		Window sill	White	Concrete	0.0
103		Window apron	White	Concrete	0.0
104		Beam across window	White	Concrete	0.0
105		HVAC duct	White	Metal	0.0
106		Door	Brown	Wood	0.0
107		Door frame	Black	Metal	0.0
108	2nd Floor Utility Room	Ceiling	White	Plaster	0.0
109		Wall	White	CMU block	0.0
110		Floor	Tan	Ceramic tile	0.0
111		Door	Brown	Wood	0.0
112		Door frame	Black	Metal	0.1
113		Kickplate	Gray	Ceramic tile	0.3
114		Floor drain basin	Tan	Concrete	0.0
115	2nd Floor Hallway	Ceiling	White	Concrete	0.0
116		Ceiling grid	White	Metal	0.0
117		Wall	White	CMU block	0.0
118		Floor	White	Floor tile	0.0
119		Door	Brown	Wood	0.0
120		Door frame	Black	Metal	0.0
121	Stairway	Roof access ladder	Black	Metal	6.2
122	Calibration				1.0
123	Calibration				1.0
124	Calibration				1.1

Bold = LBP

APPENDIX II
PHOTOGRAPHIC LOG



Photo 1 – The former Fire Station located at 21 Adams Street, Canton, NC 28716



Photo 2 – Green metal wind barrier on the roof – LBP

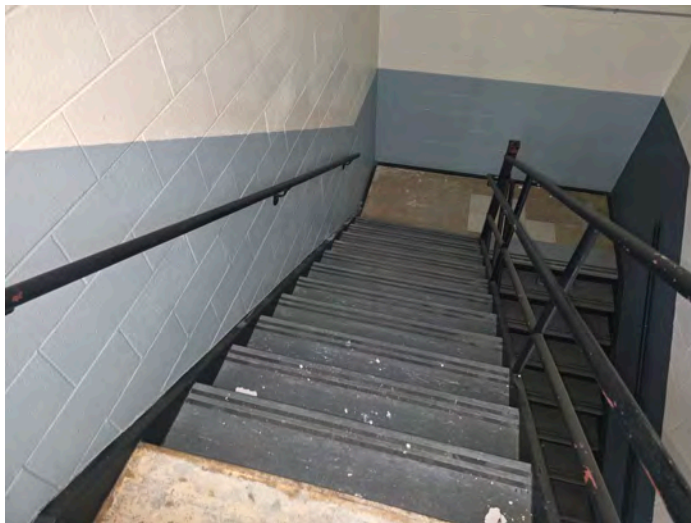


Photo 3 – Black metal handrails in both stairways – LBP



Photo 4 – Typical view of a white metal sink in the bathrooms



Photo 5 – Typical view of a white metal sink in the bathrooms



Photo 6 – Black metal roof access ladder in one of the stairways - LBP

APPENDIX III

EPA LBP FIRM & RISK ASSESSOR CERTIFICATION

United States Environmental Protection Agency

This is to certify that

Oliver Environmental Solutions, LLC

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

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires October 30, 2028

LBP-F312078-1

Certification #

October 16, 2025

Issued On



Marc Edmonds, Supervisor

Existing Chemicals Risk Management Branch 2.

United States Environmental Protection Agency

This is to certify that



Thomas H Oliver

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

Risk Assessor

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires January 04, 2027

LBP-R-36342-3

Certification #

December 21, 2023

Issued On



A handwritten signature in black ink, appearing to read "Adrienne Priselac".

Adrienne Priselac, Manager, Toxics Office

Land Division

APPENDIX IV

XRF PCS DOCUMENTATION

Performance Characteristic Sheet

EFFECTIVE DATE: February 1, 2022

MANUFACTURER AND MODEL:

Make: **SciAps**
 Models: **Model X-550**
 X-Ray Source: **Rhodium (Rh) or Gold (Au) Anode**

FIELD OPERATION GUIDANCE

ACTION LEVEL SETTING IN THE INSTRUMENT: 1.0 mg/cm²

NOTE: This PCS is not applicable at other Action Level settings; the Action Level setting of the instrument must be 1.0 mg/cm² to use this PCS.

OPERATING PARAMETERS:

Timed mode: fixed 10-second reading.
 Quick mode: variable-time reading (approximately 2-6 seconds).

XRF CALIBRATION CHECK LIMITS:

0.8 to 1.2 mg/cm² (inclusive) on NIST SRM 2579 (1.02 mg/cm²)/NIST SRM 2573, or equivalent

SUBSTRATE CORRECTION:

Not applicable

INCONCLUSIVE RANGE OR THRESHOLD:

Rh Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	THRESHOLD (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	0.5
	Concrete	0.5
	Drywall	0.5
	Metal	0.5
	Plaster	0.5
	Wood	0.5
Au Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	INCONCLUSIVE RANGE (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	(0.4-0.6)
	Concrete	(0.4-0.6)
	Drywall	(0.4-0.6)
	Metal	(0.4-0.6)
	Plaster	(0.4-0.6)
	Wood	(0.4-0.6)

BACKGROUND INFORMATION

EVALUATION DATA SOURCE AND DATE:

This sheet is supplemental information to be used in conjunction with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, 2012 Edition ("HUD Guidelines"). Performance parameters shown on this sheet are calculated using test results on building components in the HUD archive. Testing was conducted on 146 test samples in February 2022, with two separate instruments of each Anode type, operated in both Timed and Quick modes.

OPERATING PARAMETERS

Performance parameters shown in this sheet are applicable only when properly operating the instrument using the manufacturer's instructions and procedures described in Chapter 7 of the HUD Guidelines.

XRF CALIBRATION CHECK:

The calibration of the XRF instrument should be checked using the paint film nearest 1.0 mg/cm² in the NIST Standard Reference Material (SRM) used (e.g., for NIST SRM 2579, use the 1.02 mg/cm² film; for NIST SRM 2579a, use film 2573 (1.04 mg/cm²)).

If the average (rounded to 1 decimal place) of three readings is outside the acceptable calibration check range, follow the manufacturer's instructions to bring the instrument into control before XRF testing proceeds.

EVALUATING THE QUALITY OF XRF TESTING:

Randomly select ten testing combinations for retesting from each house or from two randomly selected units in multifamily housing.

Conduct XRF re-testing at the ten testing combinations selected for retesting.

Determine if the XRF testing in the units or house passed or failed the test by applying the steps below. Compute the Retest Tolerance Limit by the following steps:

Determine XRF results for the original and retest XRF readings. In single-family and multi-family housing, a result is defined as a single reading. Therefore, there will be ten original and ten retest XRF results for each house or for the two selected units.

Calculate the average of the original XRF result and the retest XRF result for each testing combination.

Square the average for each testing combination.

Add the ten squared averages together. Call this quantity C.

Multiply the number C by 0.0072. Call this quantity D.

Add the number 0.032 to D. Call this quantity E.

Take the square root of E. Call this quantity F.

Multiply F by 1.645. The result is the Retest Tolerance Limit.

Compute the average of all ten original XRF readings.

Compute the average of all ten re-test XRF readings.

Find the absolute difference of the two averages.

If the difference is less than the Retest Tolerance Limit, the inspection has passed the retest. If the difference of the overall averages equals or exceeds the Retest Tolerance Limit, this

procedure should be repeated with ten new testing combinations. If the difference of the overall averages is equal to or greater than the Retest Tolerance Limit a second time, then the inspection should be considered deficient.

Use of this procedure is estimated to produce a spurious result approximately 1% of the time. That is, results of this procedure will call for further examination when no examination is warranted in approximately 1 out of 100 dwelling units tested.

TESTING TIMES:

The reading time in Archive tests was 10 seconds in Timed mode and from 2-6 seconds in Quick mode, for both the Rh Anode and Au Anode.

CLASSIFICATION OF RESULTS:

XRF results for the Rh Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.5 mg/cm² and **negative** if they are **less than** 0.5 mg/cm².

XRF results for the Au Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.6 mg/cm², **negative** if they are **less than or equal** to 0.4 mg/cm² and **inconclusive** if they are **greater** than 0.4 mg/cm² **AND less than** 0.6 mg/cm².

DOCUMENTATION:

A report titled *Methodology for XRF Performance Characteristic Sheets* (EPA 747-R-95-008) provides an explanation of the statistical methodology used to develop Performance Characteristic Sheets at the Federal standard (Action Level) of 1.0 mg/cm² and provides empirical results from using the recommended inconclusive ranges or thresholds for specific XRF instruments. The report may be downloaded at <http://www2.epa.gov/lead/methodology-xrf-performance-characteristic-sheets-epa-747-r-95-008-september-1997>. The methodology was subsequently generalized by QuanTech for application to other Action Levels.

ASBESTOS CONTAINING MATERIALS SURVEY: PRE-DEMOLITION

58 PARK STREET
CANTON, NORTH CAROLINA 28716

Prepared For:
Town of Canton
85 Summer Street
Canton, North Carolina 28716

BLE Project Number 26-29858.01

May 13, 2026



TABLE OF CONTENTS

1.0 INTRODUCTION..... 1

2.0 SURVEY AREA..... 1

3.0 METHODOLOGY 1

4.0 SURVEY SUMMARY..... 2

4.1 Presumed ACMs 3

5.0 CONCLUSIONS AND RECOMMENDATIONS..... 3

6.0 CERTIFICATIONS AND QUALIFICATIONS..... 3

7.0 QUALIFICATION OF REPORT 4

Tables

Table 1	Suspect ACMs Surveyed
Table 2	Confirmed ACMs

Appendices

Appendix A	Figures
Appendix B	Photographs
Appendix C	Laboratory Analytical Report(s)
Appendix D	Professional Qualifications
Appendix E	Geoenvironmental Report



1.0 INTRODUCTION

Bunnell-Lammons Engineering, Inc. (BLE) performed a Pre-Demolition Asbestos Containing Materials (ACM) Survey of the former town hall building located at 58 Park Street in Canton, Haywood County, North Carolina (herein referred to as the Site). The building is a two-story structure with an approximate 8,000-square foot footprint. This survey was performed in accordance with our Proposal No. 26-29858 dated April 28, 2026 and authorized by Ms. Lisa Stinnet of the Town of Canton.

On May 6, 2026, Mr. Brian Davis (NC Asbestos Inspector # 13453) performed the field survey of the Site. The location of each sample collected is depicted on Figure 1. The attached Table 1 describes each suspect ACM sampled, and Table 2 lists building materials confirmed to be asbestos containing (i.e., > 1% asbestos) or presumed to be asbestos containing.

2.0 SURVEY AREA

Survey Area	
Property Name / Occupant	Former Town Hall / Vacant
Property Street Address	58 Park Street
County / City / State / Zip	Haywood County, Canton, North Carolina 28716
Desc. of Survey Area(s)	Interior and exterior of the building
Date of Construction	~1970

3.0 METHODOLOGY

The North Carolina Department of Health and Human Service (NCDHHS) administers the Asbestos Hazard Management Program under North Carolina General Statute 130A-444 through 452. Additionally, the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 61, Subpart M 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, asbestos-containing building materials are classified as either friable, Category I non-friable, or Category II non-friable ACM. Friable materials are those that, when dry, may be crumbled, pulverized or reduced to powder by hand pressure.

The asbestos NESHAP requires that potentially regulated ACM (RACM) be identified, classified, and quantified prior to planned disturbances or demolition activities. In accordance with EPA’s NESHAPs, the “owner or operator of a demolition or renovation activity and prior to commencement of the demolition or renovation will thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos”.

The Occupational Safety and Health Administration (OSHA) Asbestos Standard for Construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers be maintained below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc). 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.

RACM must be removed prior to demolition activities which will disturb the ACM materials. The owner or operator must provide the NCDHHS with written notification of planned removal activities at least 10 working days prior to the commencement of asbestos abatement activities. Removal of RACM must be conducted by a State of North Carolina licensed asbestos abatement contractor.

The collected asbestos samples were placed into individual sample containers, sealed, and clearly labeled. Samples were submitted under strict Chain-of-Custody to a certified laboratory for analysis. Samples were analyzed by a National Institute of Standards and Technology (NIST) accredited laboratory via Polarized Light Microscopy (PLM) via EPA Method 600/M4-82-020 per 40 CFR 763.

4.0 SURVEY SUMMARY

The Site is improved with a two-story commercial building which formerly operated as the town hall which housed a police station and courthouse. The commercial building consists of concrete masonry unit (CMU) block and brick masonry exterior walls constructed on a concrete slab-on-grade foundation. Roofing consists of ethylene propylene diene monomer (EPDM) membrane with foam, fiberglass insulation, tar, and felt applied to concrete decking. Interior features generally include floors consisting of concrete, vinyl composite tiles (VCT), ceramic tiles, and carpet. Interior walls consist of CMU blocks, plaster, and drywall. The ceilings consist of ceiling tiles.

BLE understands the structure is planned for demolition; therefore, an asbestos survey was performed to determine if ACMs are present.

During the survey, twenty-three (23) distinct suspect ACMs were sampled and assessed for their condition and potential for disturbance. The following is a summary of the building materials assessed during this survey:

- Mastic
- Floor Tile
- Plaster Skim Coat
- Plaster Base Coat
- Drywall
- Ceiling Tile
- Leveling Compound
- Caulk
- Cove Base
- Flashing
- Roofing
- Sealant
- Insulation
- Tar

Building materials were assessed to be in good condition with a low potential for disturbance.

In addition, BLE observed and documented the presence of non-suspect asbestos containing materials, including, but not limited to: silicone, glass, metals, kiln brick, cement, fiberglass, concrete, pressed wood, cinder block, and rubber.



4.1 Presumed ACMs

The tan/clear caulk and black/clear caulk in sample set 13A and 13B, respectively, was presumed to be asbestos containing.

5.0 CONCLUSIONS AND RECOMMENDATIONS


A total of seventy-five (75) P PLM layers were analyzed by the laboratory during the course of this survey. Table 1 provides a summary of each material analyzed during this survey. **Table 2 summarizes the eight (8) confirmed ACMs and two (2) presumed ACM identified during this assessment.** No presumed ACMs were identified during this survey.


Prior to renovation and/or demolition of the survey area, abatement of all ACMs is required by an appropriately licensed asbestos abatement contractor.

6.0 CERTIFICATIONS AND QUALIFICATIONS

This Asbestos Survey report describes the conditions of the area of investigation, as observed by the inspector at the time of the field survey. BLE relied upon information provided by the Client to clearly define the area of planned renovation and/or demolition to be inspected during the completion of this survey.

It is possible that additional suspect asbestos containing materials may exist at the Site, which may not have been observed during this investigation due to inaccessibility, safety limitations, or hidden behind or within other structural features. Should suspect ACMs be identified that were not assessed as part of this survey as noted in Table 1, further inspection by a certified asbestos inspector would be warranted prior to disturbing the material(s).

Building Inspector	Signature	Date of Survey	Certification #
Brian Davis		05/06/2026	13453

Senior Review	Signature	Date	Certification #
Daniel R. Matz, P.E.		05/13/2026	13439



7.0 QUALIFICATION OF REPORT

The findings contained herein are based upon the data that was reviewed and documented in this report along with our experience on similar projects. The discovery of any additional information concerning the environmental conditions at the site should be reported to us for our review so that we can reassess potential environmental impacts and modify our recommendations, if necessary.

Sincerely,

BUNNELL LAMMONS ENGINEERING INC.

Brian Davis
Environmental Scientist
Certification#: 13453

Daniel R. Matz, P.E.
Senior Environmental Engineer
Certification#: 13439



Table 1: Suspect ACMs Surveyed					
Sample ID:	Material Desc.	Location	Quantity	Condition	% Asbestos
1 A-I	White Plaster Skim Coat Gray Plaster Base Coat	Interior Walls	15,000 SF	G	None Detected
2 A-G	Gray Plaster Base Coat	Interior Walls	10,000 SF	G	None Detected
3 A-B	Tan Mastic	Central and eastern portion of floor on first floor	350 SF	G	None Detected
4 A-B	Black Mastic	Ceiling HVAC ductwork throughout	600 LF	G	Chrysotile 10%
5 A-B	White/tan Drywall	First floor behind plaster in select areas	1,500 SF	G	None Detected
6 A-B	White/tan Ceiling Tile	First floor ceiling	6,000 SF	G	None Detected
7 A-B	Tan Mastic Gray Leveling Compound	Western portion of floor on first floor	350 SF	G	None Detected
8 A-B	Black Caulk	Exterior windows and doors	800 LF	G	None Detected
9 A-B	Black/brown Flashing	Roof parapet walls	1,200 SF	G	Chrysotile 15%
10 A-B	Black Roofing Black/brown Flashing Brown Insulation Yellow Insulation	Roof	8,000 SF	G	Black Roofing: None Detected Black/brown Flashing: Chrysotile 15% Brown Insulation: None Detected Yellow Insulation: None Detected
11 A-B	Black Caulk	Roof seams	200 LF	G	None Detected

Table 1: Suspect ACMs Surveyed					
Sample ID:	Material Desc.	Location	Quantity	Condition	% Asbestos
12 A-B	Silver Sealant	HVAC units on roof	150 SF	G	None Detected
13 A-B	Tan/clear Caulk Black/clear Caulk Black Tar	Base of metal wall on roof	50 LF	G	Tan/clear Caulk: Presumed Black/clear Caulk: Presumed Black Tar: Chrysotile 7%
14 A-B	Black Flashing	Base of HVAC units on roof and roof hatch	500 SF	G	Chrysotile 15%
15 A-C	White Drywall	Behind plaster behind plaster and ceiling tiles	5,000 SF	G	None Detected
16 A-B	Black Cove Base Brown Mastic	Second floor walls	500 LF	G	None Detected
17 A-B	Off-white Floor tile Black Mastic	Central portion and western hallways on second floor	2,000 SF	G	Off-white Floor tile: Chrysotile 3% Black Mastic: Chrysotile 2%
18 A-B	Black/Tan Mastic	Second floor northwestern room floor	140 SF	G	Chrysotile 2%
19 A-B	Yellow Mastic	Second floor western room under carpet	250 SF	G	None Detected
20 A-B	Yellow Mastic	Underneath carpet in second floor offices	800 SF	G	None Detected
21 A-B	Yellow Mastic	Underneath carpet in second floor offices	800 SF	G	None Detected



Table 1: Suspect ACMs Surveyed					
Sample ID:	Material Desc.	Location	Quantity	Condition	% Asbestos
22 A-B	White/beige Ceiling tile	Second floor ceiling	5,000 SF	G	None Detected
23 A-B	White/beige Ceiling tile	Second floor western room ceiling	250 SF	G	None Detected

SF – Square feet

LF – Linear Feet

None Detected – <1% Asbestos

Table 2: Confirmed ACMs						
Sample ID:	Material Desc.	Location	Quantity ¹	Condition ²	Friable / Non-Friable ²	% Asbestos
4 A-B	Black Mastic	Ceiling HVAC ductwork throughout	600 LF	G	Non-Friable	Chrysotile 10%
9 A-B	Black/brown Flashing	Roof parapet walls	1,200 SF	G	Non-Friable	Chrysotile 15%
10 A-B	Black/brown Flashing	Roof	8,000 SF	G	Non-Friable	Chrysotile 15%
13 A-B	Tan/clear Caulk Black/clear Caulk Black Tar	Base of metal wall on roof	50 LF	G	Non-Friable	Tan/clear Caulk: Presumed Black/clear Caulk: Presumed Black Tar: Chrysotile 7%
14 A-B	Black Flashing	Base of HVAC units on roof and roof hatch	500 SF	G	Non-Friable	Chrysotile 15%
17 A-B	Off-white Floor tile Black Mastic	Central portion and western hallways on second floor	2,000 SF	G	Non-Friable	Off-white Floor tile: Chrysotile 3% Black Mastic: Chrysotile 2%
18 A-B	Black/Tan Mastic	Second floor northwestern room floor	140 SF	G	Non-Friable	Chrysotile 2%

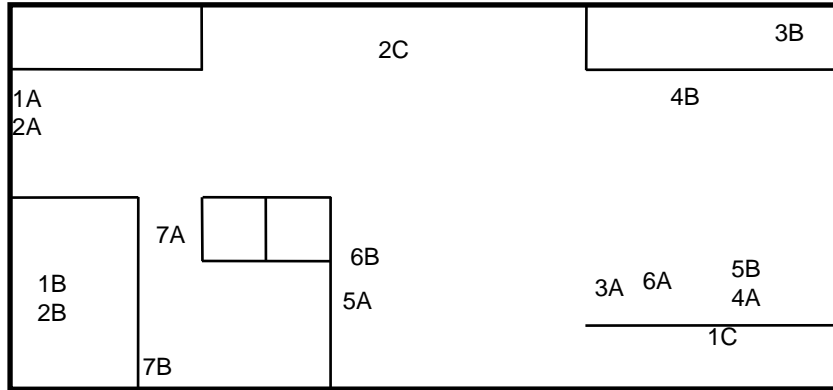
SF – Square feet

LF – Linear Feet

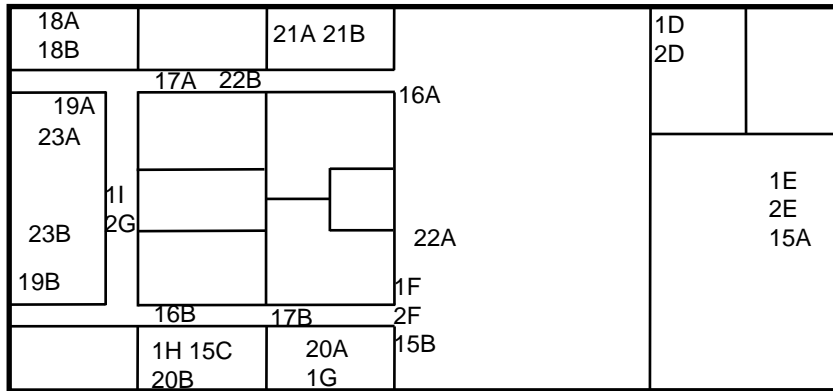
G – Good

- Quantity reflects a gross estimate of suspect ACM/ACM present and should be confirmed by a contractor prior to abatement.
- The condition and friable/non-friable characteristics of each ACM is reported as observed by the Building Inspector at the time of the survey. If a non-friable ACM becomes damaged or significantly damaged prior to or during abatement, it would be considered friable and require abatement as a friable ACM, thus influencing the cost of abatement.

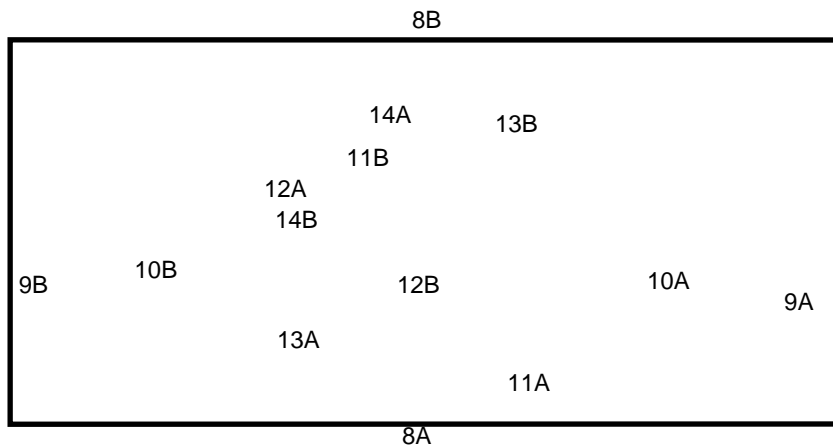
APPENDIX A
Figures



First Floor



Second Floor



Exterior

DRAWN: BPD	DATE: 05/07/2026	 6004 Ponders Court, Greenville, SC 29615 Phone: (864) 288-1265	Sample Location Map 58 Park Street Canton, North Carolina	FIGURE 1
CHECKED: DRM	JOB No: 26-29858.01			
APPROVED: DRM				

APPENDIX B
Photographs



Photo 1: View of the northern side of the Site building.



Photo 2: View of the eastern side of the Site building.



Photo 3: View of the southern side of the Site building.



Photo 4: View of the western side of the Site building.



Photo 5: View of the white plaster skim coat and gray plaster base coat on the walls throughout. Note the drywall behind.



Photo 6: View of the absence of joint compound on the drywall.



Photo 7: View of the asbestos containing black mastic on the HVAC ductwork in the ceiling.



Photo 8: View of the asbestos containing black/brown flashing on the roof parapet walls.



Photo 9: View of the black roofing, brown insulation, yellow insulation, and asbestos containing black/brown flashing on the roof.



Photo 10: View of the asbestos containing black tar on the base of the metal wall on the roof.



Photo 11: View of the asbestos containing black flashing on the base of the roof HVAC units and roof hatch.

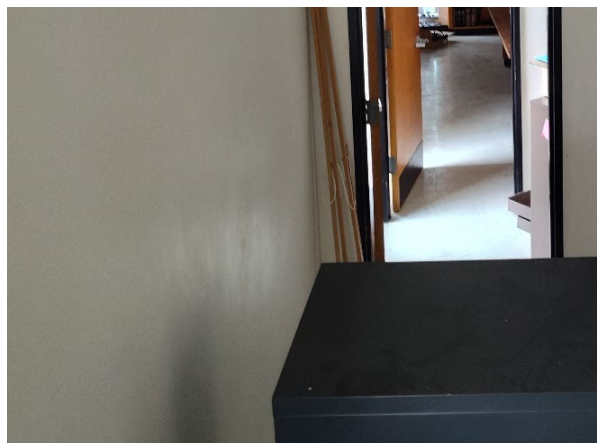


Photo 12: View of the asbestos containing off-white floor tile and underlying black mastic in the central portion and western hallways of the second floor.

APPENDIX C
Laboratory Analytical Report(s)

May 12, 2026

Brian Davis
Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

CLIENT PROJECT: 26-29858.01, Park Street
LAB CODE: 748735-1

Dear Brian,

Enclosed are asbestos analysis results for PLM Bulk samples received at our laboratory on 05/08/26. The samples were analyzed for asbestos using polarizing light microscopy (PLM) per the EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials and EPA 40 CFR Appendix E to Subpart E of Part 763: Interim Method of the Determination of Asbestos in Bulk Insulation Samples.

Sample results containing >1% asbestos are considered asbestos-containing materials (ACMs) per EPA regulatory requirements. The detection limit for the EPA 600 Method is <1% by calibrated visual estimate.

Thank you for your business and we look forward to continuing good relations.

Kind Regards,



Kamila Reichert,
Laboratory Director

NVLAP 600323-0



Built Environment Testing

ASBESTOS ANALYTICAL REPORT By: Polarized Light Microscopy

Prepared for

Bunnell-Lammons Engineering, Inc (BLE)

CLIENT PROJECT:	26-29858.01, Park Street
LAB CODE:	748735-1
TEST METHOD:	EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763
REPORT DATE:	05/12/26
TOTAL SAMPLES ANALYZED:	57
# SAMPLES >1% ASBESTOS:	9
TOTAL LAYERS ANALYZED:	75

Project: 26-29858.01, Park Street

Lab Code: 748735-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
1A	4420505	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1B	4420506	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1C	4420507	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1D	4420508	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1E	4420509	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1F	4420510	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1G	4420511	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1H	4420512	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
1I	4420513	Layer A	White plaster skim coat	None Detected
		Layer B	Gray plaster base coat	None Detected
2A	4420514		Gray plaster base coat	None Detected
2B	4420515		Gray plaster base coat	None Detected
2C	4420516		Gray plaster base coat	None Detected
2D	4420517		Gray plaster base coat	None Detected
2E	4420518		Gray plaster base coat	None Detected
2F	4420519		Gray plaster base coat	None Detected
2G	4420520		Gray plaster base coat	None Detected
3A	4420521		Tan mastic	None Detected

Project: 26-29858.01, Park Street

Lab Code: 748735-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
3B	4420522		Tan mastic	None Detected
4A	4420523		Black mastic	Chrysotile 10%
4B	4420524		Sample Not Analyzed per Client Request	
5A	4420525		White/tan drywall	None Detected
5B	4420526		White/tan drywall	None Detected
6A	4420527		White/tan ceiling tile	None Detected
6B	4420528		White/tan ceiling tile	None Detected
7A	4420529	Layer A	Tan mastic	None Detected
		Layer B	Gray leveling compound	None Detected
7B	4420530	Layer A	Tan mastic	None Detected
		Layer B	Gray leveling compound	None Detected
8A	4420531		Black caulk	None Detected
8B	4420532		Black caulk	None Detected
9A	4420533		Black/brown flashing	Chrysotile 15%
9B	4420534		Sample Not Analyzed per Client Request	
10A	4420535	Layer A	Black roofing	None Detected
		Layer B	Black/brown flashing	Chrysotile 15%
		Layer C	Brown insulation	None Detected
		Layer D	Yellow insulation	None Detected
10B	4420536	Layer A	Black roofing	None Detected
		Layer B	Black/brown flashing	Chrysotile 15%
		Layer C	Brown insulation	None Detected
		Layer D	Yellow insulation	None Detected
11A	4420537		Black caulk	None Detected
11B	4420538		Black caulk	None Detected
12A	4420539		Silver sealant	None Detected

Project: 26-29858.01, Park Street

Lab Code: 748735-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
12B	4420540		Silver sealant	None Detected
13A	4420541	Layer A	Tan/clear caulk	None Detected
		Layer B	Black tar	Chrysotile 7%
13B	4420542	Layer A	Black/clear caulk	None Detected
		Layer B	Layer Not Analyzed	
14A	4420543		Black flashing	Chrysotile 15%
14B	4420544		Sample Not Analyzed per Client Request	
15A	4420545		White drywall	None Detected
15B	4420546		White drywall	None Detected
15C	4420547		White drywall	None Detected
16A	4420548		Black cove base	None Detected
16A (2)	4434035		Brown mastic	None Detected
16B	4420549		Black cove base	None Detected
16B (2)	4434036		Brown mastic	None Detected
17A	4420550		Off-white floor tile	Chrysotile 3%
17A (2)	4434037		Black mastic	Chrysotile 2%
17B	4420551		Sample Not Analyzed per Client Request	
18A	4420552		Black/tan mastic	Chrysotile 2%
18B	4420553		Sample Not Analyzed per Client Request	
19A	4420554		Yellow mastic	None Detected
19B	4420555		Yellow mastic	None Detected
20A	4420556		Yellow mastic	None Detected
20B	4420557		Yellow mastic	None Detected
21A	4420558		Yellow mastic	None Detected
21B	4420559		Yellow mastic	None Detected
22A	4420560		White/beige ceiling tile	None Detected

Project: 26-29858.01, Park Street

Lab Code: 748735-1

Method: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

Client ID	Lab ID	Layer	Sample Description	Asbestos %
22B	4420561		White/beige ceiling tile	None Detected
23A	4420562		White/beige ceiling tile	None Detected
23B	4420563		White/beige ceiling tile	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
1A Layer A 4420505	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420505	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

1B Layer A 4420506	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420506	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

1C Layer A 4420507	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420507	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
1D Layer A 4420508	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420508	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

1E Layer A 4420509	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420509	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

1F Layer A 4420510	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
		White	35%	Silica	
		Non-Fibrous	5%	Paint	
		Bound			

Layer B 4420510	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
		Gray	35%	Binder	
		Non-Fibrous			
		Bound			

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID	Lab	Lab	NON-ASBESTOS COMPONENTS		ASBESTOS
Lab ID	Description	Attributes	Fibrous	Non-Fibrous	%
1G	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
Layer A 4420511		White Non-Fibrous Bound	35%	Silica Paint	
Layer B 4420511	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65%	Silica Binder	None Detected
1H	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
Layer A 4420512		White Non-Fibrous Bound	35%	Silica Paint	
Layer B 4420512	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65%	Silica Binder	None Detected
1I	Plaster Skim Coat	Heterogeneous	60%	Binder	None Detected
Layer A 4420513		White Non-Fibrous Bound	35%	Silica Paint	
Layer B 4420513	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65%	Silica Binder	None Detected
2A	Plaster Base Coat	Homogeneous	65%	Silica	None Detected
4420514		Gray Non-Fibrous Bound	35%	Binder	

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
2B 4420515	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
2C 4420516	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
2D 4420517	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
2E 4420518	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
2F 4420519	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
2G 4420520	Plaster Base Coat	Homogeneous Gray Non-Fibrous Bound	65% 35%	Silica Binder	None Detected
3A 4420521	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %	
			Fibrous	Non-Fibrous			
3B 4420522	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic		None Detected	
4A 4420523	Mastic	Homogeneous Black Non-Fibrous Bound	90%	Tar		Chrysotile 10%	
4B 4420524		Sample Not Analyzed per Client Request					
5A 4420525	Drywall	Heterogeneous White/tan Fibrous Bound	20%	Cellulose	80%	Gypsum	None Detected
5B 4420526	Drywall	Heterogeneous White/tan Fibrous Bound	20%	Cellulose	80%	Gypsum	None Detected
6A 4420527	Ceiling Tile	Heterogeneous White/tan Fibrous Loosely Bound	60% 20%	Cellulose Glass	15% 5%	Perlite Paint	None Detected
6B 4420528	Ceiling Tile	Heterogeneous White/tan Fibrous Loosely Bound	60% 20%	Cellulose Glass	15% 5%	Perlite Paint	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
7A Layer A 4420529	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic		None Detected
Layer B 4420529	Leveling Compound	Homogeneous Gray Non-Fibrous Bound	5%	Cellulose 60%	Binder 35% Calc Carb	None Detected
7B Layer A 4420530	Mastic	Homogeneous Tan Non-Fibrous Bound	100%	Mastic		None Detected
Layer B 4420530	Leveling Compound	Homogeneous Gray Non-Fibrous Bound	5%	Cellulose 60%	Binder 35% Calc Carb	None Detected
8A 4420531	Caulk	Homogeneous Black Non-Fibrous Bound	100%	Caulk		None Detected
8B 4420532	Caulk	Homogeneous Black Non-Fibrous Bound	100%	Caulk		None Detected
9A 4420533	Flashing	Homogeneous Black/brown Fibrous Bound	55%	Cellulose 30%	Tar	Chrysotile 15%
9B 4420534	Sample Not Analyzed per Client Request					

Client: Bunnell-Lammons Engineering, Inc (BLE)
 6004 Ponders Court
 Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
10A Layer A 4420535	Roofing	Heterogeneous Black Fibrous Bound	40%	Cellulose 60%	Tar	None Detected
Layer B 4420535	Flashing	Homogeneous Black/brown Fibrous Bound	55%	Cellulose 30%	Tar	Chrysotile 15%
Layer C 4420535	Insulation	Homogeneous Brown Fibrous Loosely Bound	100%	Cellulose		None Detected
Layer D 4420535	Insulation	Homogeneous Yellow Fibrous Loosely Bound	100%	Glass		None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
10B Layer A 4420536	Roofing	Heterogeneous Black Fibrous Bound	40%	Cellulose 60%	Tar	None Detected
Layer B 4420536	Flashing	Homogeneous Black/brown Fibrous Bound	55%	Cellulose 30%	Tar	Chrysotile 15%
Layer C 4420536	Insulation	Homogeneous Brown Fibrous Loosely Bound	100%	Cellulose		None Detected
Layer D 4420536	Insulation	Homogeneous Yellow Fibrous Loosely Bound	100%	Glass		None Detected
11A 4420537	Caulk	Homogeneous Black Non-Fibrous Bound		100%	Caulk	None Detected
No tar present. Sample appears to be caulk.						
11B 4420538	Caulk	Homogeneous Black Non-Fibrous Bound		100%	Caulk	None Detected
12A 4420539	Sealant	Homogeneous Silver Non-Fibrous Bound		75% 25%	Paint Tar	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %
			Fibrous	Non-Fibrous		
12B 4420540	Sealant	Homogeneous Silver Non-Fibrous Bound	75% 25%	Paint Tar	None Detected	
13A Layer A 4420541	Caulk	Homogeneous Tan/clear Non-Fibrous Bound	100%	Caulk	None Detected	
Layer B 4420541	Tar	Homogeneous Black Non-Fibrous Bound	93%	Tar	Chrysotile 7%	
13B Layer A 4420542	Caulk	Homogeneous Black/clear Non-Fibrous Bound	100%	Caulk	None Detected	
Layer B 4420542	Tar	Layer Not Analyzed per Client Request				
14A 4420543	Flashing	Homogeneous Black Fibrous Bound	55%	Cellulose 30%	Tar Chrysotile 15%	
14B 4420544		Sample Not Analyzed per Client Request				
15A 4420545	Drywall	Heterogeneous White Non-Fibrous Bound	10%	Cellulose 90%	Gypsum None Detected	

Client: Bunnell-Lammons Engineering, Inc (BLE)
6004 Ponders Court
Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS			ASBESTOS %	
			Fibrous	Non-Fibrous			
15B 4420546	Drywall	Heterogeneous White Non-Fibrous Bound	10%	Cellulose	90%	Gypsum	None Detected
15C 4420547	Drywall	Heterogeneous White Fibrous Bound	20%	Cellulose	80%	Gypsum	None Detected
16A 4420548	Cove Base	Homogeneous Black Non-Fibrous Bound			100%	Rubber	None Detected
16A (2) 4434035	Mastic	Homogeneous Brown Non-Fibrous Bound			100%	Mastic	None Detected
16B 4420549	Cove Base	Homogeneous Black Non-Fibrous Bound			100%	Rubber	None Detected
16B (2) 4434036	Mastic	Homogeneous Brown Non-Fibrous Bound			100%	Mastic	None Detected
17A 4420550	Floor Tile	Homogeneous Off-white Non-Fibrous Bound			97%	Vinyl	Chrysotile 3%

Client: Bunnell-Lammons Engineering, Inc (BLE)
 6004 Ponders Court
 Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS		ASBESTOS %
			Fibrous	Non-Fibrous	
17A (2) 4434037	Mastic	Homogeneous Black Non-Fibrous Bound	98%	Tar	Chrysotile 2%
17B 4420551		Sample Not Analyzed per Client Request			
18A 4420552	Mastic	Heterogeneous Black/tan Non-Fibrous Bound	60% 38%	Mastic Tar	Chrysotile 2%
Unable to separate for individual analysis.					
18B 4420553		Sample Not Analyzed per Client Request			
19A 4420554	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected
19B 4420555	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected
20A 4420556	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected
20B 4420557	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic	None Detected

Client: Bunnell-Lammons Engineering, Inc (BLE)
 6004 Ponders Court
 Greenville, SC 29615

Lab Code: 748735-1
Date Received: 05/08/26
Date Analyzed: 05/12/26
Date Reported: 05/12/26

Project: 26-29858.01, Park Street

Method: ASBESTOS BULK PLM, EPA 600 METHOD

Client ID Lab ID	Lab Description	Lab Attributes	NON-ASBESTOS COMPONENTS				ASBESTOS %
			Fibrous		Non-Fibrous		
21A 4420558	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic			None Detected
21B 4420559	Mastic	Homogeneous Yellow Non-Fibrous Bound	100%	Mastic			None Detected
22A 4420560	Ceiling Tile	Heterogeneous White/beige Fibrous Loosely Bound	50% 30%	Cellulose Glass	15% 5%	Perlite Paint	None Detected
22B 4420561	Ceiling Tile	Heterogeneous White/beige Fibrous Loosely Bound	50% 30%	Cellulose Glass	15% 5%	Perlite Paint	None Detected
23A 4420562	Ceiling Tile	Heterogeneous White/beige Fibrous Loosely Bound	60% 20%	Cellulose Glass	15% 5%	Perlite Paint	None Detected
23B 4420563	Ceiling Tile	Heterogeneous White/beige Fibrous Loosely Bound	60% 20%	Cellulose Glass	15% 5%	Perlite Paint	None Detected

LEGEND:

Non-Anth = Non-Asbestiform Anthophyllite
Non-Trem = Non-Asbestiform Tremolite
Calc Carb = Calcium Carbonate

METHOD: EPA 600 / R93 / 116 and EPA 40 CFR Appendix E to Subpart E of Part 763

REPORTING LIMIT: 1% by calibrated visual estimation

REGULATORY LIMIT: 1%

Due to the limitations of the EPA 600 / R93 / 116 method, nonfriable organically bound materials (NOBs) such as vinyl floor tiles can be difficult to analyze via polarized light microscopy (PLM). EPA recommends that all NOBs analyzed by PLM, and found not to contain asbestos, be further analyzed by Transmission Electron Microscopy (TEM). Please note that PLM analysis of dust and soil samples for asbestos is not covered under NVLAP accreditation. Estimated measurement of uncertainty is available on request.

Eurofins Built Environment Testing East, LLC makes no warranty representation regarding the accuracy of client submitted information in preparing and presenting analytical results. Interpretation of the analytical results is the sole responsibility of the client. This report relates only to the samples tested or analyzed and may not be reproduced, except in full, without written approval by Eurofins Built Environment Testing East, LLC. Samples were received in acceptable condition unless otherwise noted. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. Government.

Information provided by customer includes customer sample ID and sample description.



Raegan Brown
Analyst

Olivia Gardner
Analyst

DATA QA:



Olivia Gardner
5/12/2026

APPROVED BY:



Kamila Reichert,
Laboratory Director

SUBMITTED BY	INVOICE TO	CONTACT INFORMATION	SERIES
Company: Bunnell-Lammons Engineering, Inc (BLE) Address: 6004 Ponders Court Greenville, SC 29615	Company: Bunnell-Lammons Engineering, Inc (BLE) Address: 6004 Ponders Court Greenville, SC 29615	Contact: Brian Davis Phone: (864) 910-0081 Fax: Cell:	-1 PLM Priority 48
Project Number and/or P.O. #: 26-29858.01	Project Zip Code:	Final Data Deliverable Email Address: brian.davis@blecorp.com (+ 2 ADDNL. CONTACTS)	
Project Description/Location: Park Street			

ASBESTOS LABORATORY	REQUESTED ANALYSIS										VALID MATRIX CODES				LAB NOTES				
PLM / PCM / TEM / NYS DTL RUSH PRIORITY STANDARD												Air = A	Bulk = B			Drinking Water = DW Waste Water = WW **ASTM E1792 approved wipe media only**			
CHEMISTRY LABORATORY												Dust = D	Food = F						
Dust RUSH PRIORITY STANDARD												Paint = P	Soil = S						
Metals RUSH PRIORITY STANDARD *PRIOR NOTICE REQUIRED FOR SAME DAY TAT												Surface = SU	Swab = SW						
Organics* SAME DAY RUSH PRIORITY STANDARD												Tape = T	Wipe = W						
MICROBIOLOGY LABORATORY																			
Viable Analysis** PRIORITY STANDARD **TAT DEPENDENT ON SPEED OF MICROBIAL GROWTH																			
Medical Device Analysis RUSH STANDARD																			
Mold Analysis RUSH PRIORITY STANDARD																			
Turnaround times establish a laboratory priority, subject to laboratory volume and are not guaranteed. Additional fees apply for afterhours, weekends and holidays.																			
Special Instructions: NC Samples. Positive stop on positive layer, except 1A-I, 2A-G, 10A-B																			
Client Sample ID Number (Sample ID's must be unique)	ASBESTOS	CHEMISTRY	MICROBIOLOGY	ICO								Sample Volume (L) / Area	Sample Temperature (°C)	Length (or Aliquots) x Width (or Area/Aliquot)	Matrix Code	# of Containers	Date Collected mm/dd/yy	Time Collected hh:mm	Laboratory Analysis Instructions
1 1A	X														B				
2 1B	X														B				
3 1C	X														B				
4 1D	X														B				
5 1E	X														B				
6 1F	X														B				
7 1G	X														B				
8 1H	X														B				
9 1I	X														B				
10 2A	X														B				
11 2B	X														B				
12 2C	X														B				
13 2D	X														B				

Eurofins Built Environment Testing East, LLC establishes a unique Lab Sample ID, for each sample, by preceding each unique Client Sample ID with the laboratory RES Job Number. Eurofins Built Environment Testing East, LLC will analyze incoming samples based on information received and will not be responsible for errors or omissions in calculations resulting from the inaccuracy of original data. By signing, client/company representative agrees that submission of the following samples for requested analysis as indicated on this Chain of Custody shall constitute an analytical services agreement with payment terms of NET30. Failure to comply with payment terms may result in a 18% APR finance charge.

Relinquished By:	Date/Time: 05/08/2026 10:21:59	Sample Condition: Acceptable
Received By:	Brenda Ibarra Date/Time: 05/08/2026 11:36:13	Carrier: Fed-Ex

748735



730 SE Maynard Road, Cary, NC 27511
 Tel: 866-481-1412; Fax: 919-481-1442

ASBESTOS CHAIN OF CUSTODY

LAB USE ONLY
CEI Lab Code:
CEI Lab I.D. Range:

COMPANY INFORMATION	PROJECT INFORMATION
CEI CLIENT #:	Job Contact: Brian Davis
Company: BLE	Email / Tel: brian.davis@blecorp.com
Address: 6004 Ponders Court Greenville, SC	Project Name: <i>Pine Street</i>
Email: brian.davis@blecorp.com	Project ID#: 26-29858.01
Tel: 864-910-0081 Fax:	PO #:
	STATE SAMPLES COLLECTED IN: NC

IF TAT IS NOT MARKED STANDARD 3 DAY TAT APPLIES.

ASBESTOS	METHOD	TURN AROUND TIME					
		4 HR	6 HR	24 HR	2 DAY	3 DAY	5 DAY
PLM BULK	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (400)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM POINT COUNT (1000)	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM GRAV w POINT COUNT	EPA 600	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PLM BULK	CARB 435	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
PCM AIR	NIOSH 7400	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	EPA AHERA	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	NIOSH 7402	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	ISO 10312	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM AIR	ASTM 6281-09	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM BULK	CHATFIELD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST WIPE	ASTM D6480-05 (2010)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM DUST MICROVAC	ASTM D5755-09 (2014)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM SOIL	ASTM D7521-13	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TEM VERMICULITE	CINCINNATI METHOD	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OTHER:		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REMARKS / SPECIAL INSTRUCTIONS: <i>Positive stop on positive matrix, except 1A-I, 2A-G, 10+B</i>		<input checked="" type="checkbox"/> Accept Samples
		<input type="checkbox"/> Reject Samples
Relinquished By:	Date/Time	Received By:
Brian Davis	<i>5-7-26 / 1:50</i>	<i>Darby Blanton</i>
		<i>5/8/26 10:21 AM</i>

Samples will be disposed of 30 days after analysis

Table 1: Suspect ACMs Surveyed

Sample ID:	Material Desc.
1 A-I	White Plaster Skim Coat Gray Plaster Base Coat
2 A-G	Gray Plaster Base Coat
3 A-B	Tan Mastic
4 A-B	Black Mastic
5 A-B	Drywall
6 A-B	Ceiling Tile
7 A-B	Mastic
8 A-B	Caulk
9 A-B	Flashing
10 A-B	Roofing
11 A-B	Tar
12 A-B	Sealant
13 A-B	Sealant
14 A-B	Flashing
15 A-C	Drywall
16 A-B	Cove base and mastic
17 A-B	Floor tile and mastic
18 A-B	Mastic
19 A-B	Mastic
20 A-B	Mastic
21 A-B	Mastic
22 A-B	Ceiling tile
23 A-B	Ceiling tile

APPENDIX D
Professional Qualifications

North Carolina
Asbestos Accreditation



EXPIRATION			
07-31-2026			
DOB	SEX	HT	WT
09-22-1992	M	5'6"	145
CLASS	#	EXP	
INSPECTOR	13453	07-26	

Brian P Davis
823 S Chuch St Apt 1530
Greenville, SC 29601

149573

**North Carolina
Asbestos Accreditation**



EXPIRATION			
07-31-2026			
DOB	SEX	HT	WT
10-29-1984	M	5'10"	150
CLASS	#	EXP	
INSPECTOR	13439	07-26	

Daniel Robert Matz
448 Crepe Myrtle Dr
Greer, SC 29651

149572

APPENDIX E
Geoenvironmental Report

IMPORTANT INFORMATION ABOUT THIS

GEOENVIRONMENTAL REPORT

Geoenvironmental assessments along with the resulting report are commissioned to gain information about environmental conditions in, on, at, and/or beneath the surface of a site. Geoenvironmental reports are commonly prepared during due diligence activities and may be known in the environmental community as, *Phase II Environmental Site Assessments, Limited Soil and/or Groundwater Assessments, etc.*

The more comprehensive the study, the more reliable the assessment is likely to be. However, no matter how much data or information is gathered about a site, risks created by unanticipated conditions will always remain. Work with your geoenvironmental consultant to manage known and unknown risks. Part of that process should already have been accomplished, through the risk allocation provisions you and your geoenvironmental professional discussed and included in your contract's general terms and conditions. This document is intended to explain some of the concepts that may be included in your agreement, and to pass along information and suggestions to help you manage your risk.

Beware of Change; Keep Your Geoenvironmental Professional Advised

The design of a geoenvironmental study considers a variety of factors that are subject to change. Changes can undermine the applicability of a report's findings, conclusions, and recommendations. *It is our responsibility to advise your geoenvironmental professional about any changes you become aware of.* Geoenvironmental professionals cannot accept responsibility or liability for problems that occur because a report fails to consider conditions that did not exist when the study was initiated. Ask your geoenvironmental professional about the types of changes you should be particularly alert to. Some of the most common include:

- modification of the proposed development or ownership group,
- sale or other property transfer,
- replacement of or additions to the financing entity(s),
- amendment of existing regulations or introduction of new ones, or
- changes in the use or condition of adjacent property.

Should you become aware of any change, do not rely on a geoenvironmental report. Advise your geoenvironmental professional immediately; follow the professional's advice.

Recognize the Impact of Time

A geoenvironmental professional's findings, recommendations, and/or conclusions cannot remain valid indefinitely. The more time that passes, the more likely it is that important latent changes will occur. *Do not rely on a geoenvironmental report if too much time has elapsed since it was completed.* Ask your environmental professional to define "too much time."

Prepare to Deal with Unanticipated Conditions

The findings, recommendations, and/or conclusions of a geoenvironmental report typically are based on a review of historical information, interviews, a site "walkover," and other forms of noninvasive research to develop a geoenvironmental scope of work. When site subsurface conditions are not sampled in any way, the risk of unanticipated conditions is higher than it would otherwise be.

While borings, installation of monitoring wells, and similar invasive test methods can help reduce the risk of unanticipated conditions, do not overvalue the effectiveness of testing. Testing provides information about actual conditions only at the precise locations where samples are taken, and only when they are taken. Your geoenvironmental professional has applied that specific information to develop a general opinion about environmental conditions. *Actual conditions in areas not sampled may differ (sometimes sharply) from those predicted in a report.* For example, a site may contain an unregistered underground storage tank that shows no surface trace of its existence. *Even conditions in areas that were tested can change,* sometimes suddenly, due to any number of events, not the least of which include occurrences at adjacent sites. Recognize, too, that *even some conditions in tested areas may go undiscovered,* because the tests or analytical methods used were designed to detect only those conditions assumed to exist.

Do Not Permit Any Other Party to Rely on the Report

Geoenvironmental professionals perform studies and prepare their reports to meet the specific needs and goals of the clients who retain them, in light of the risk management methods that the client and geoenvironmental professional agree to, and the statutory, regulatory, or other requirements that apply. A study prepared to meet one client's goals might not meet the goals for another client or third party. *Unless the report specifically states otherwise, it was developed for you and only you.* Do not unilaterally permit any other party to rely on it. The report and the study underlying it may not be adequate for another party's needs or goals, and you could be held liable for shortcomings your geoenvironmental professional was powerless to prevent or anticipate. Inform your geoenvironmental professional when you know or expect that someone else—a third-party—will want to use or rely on the report. *Do not permit third-party use or reliance until you first confer with the geoenvironmental professional who prepared the report.* Additional testing, analysis, or study may be required and, in any event, appropriate terms and conditions should be agreed to so both you and your geoenvironmental professional are protected from third-party risks. *Any party who relies on a geoenvironmental report without the express written permission of the professional who prepared it and the client for whom it was prepared may be solely liable for any problems that arise.*

Avoid Misinterpretation of the Report

Design professionals and other parties may want to rely on the report in developing plans and specifications. They need to be advised, in writing, that their needs may not have been considered when the study's scope was developed, and, even if their needs were considered, they might misinterpret geoenvironmental findings, conclusions, and/or recommendations. *Your geoenvironmental professional may be further retained to explain pertinent elements of the report to others who are permitted to rely on it, or to review plans, specifications or other instruments of professional service that*

incorporate any of the report's findings, conclusions, or recommendations. Your geoenvironmental professional has the best understanding of the issues involved, including the fundamental assumptions for which the project scope was developed.

Give Contractors Access to the Report

To reduce the risk of delays, claims, and disputes, it may be prudent to give contractors access to the full report, *providing that it is accompanied by a letter of transmittal that can protect you* by making it unquestionably clear that: 1) the study was not conducted and the report was not prepared for purposes of bid development, and 2) the findings, conclusions, and/or recommendations included in the report are based on a variety of opinions, inferences, and assumptions and are subject to interpretation. Use the letter to also advise contractors to consult with your geoenvironmental professional to obtain clarifications, interpretations, and guidance (a fee may be required for this service), and that—in any event—they should conduct additional studies to obtain the specific type and extent of information each prefers for preparing a bid or cost estimate. Providing access to the full report, with the appropriate caveats, helps prevent formation of adversarial attitudes and claims of concealed or differing conditions. If a contractor elects to ignore the warnings and advice in the letter of transmittal, it would do so at its own risk. Your geoenvironmental professional should be able to help you prepare an effective letter.

Do Not Separate Documentation from the Report

Geoenvironmental reports often include supplemental documentation, such as maps and copies of regulatory files, permits, registrations, citations, and/or correspondence with regulatory agencies. If subsurface explorations were performed, the report may contain final boring logs or copies of laboratory data. If remediation activities occurred on site, the report may include: copies of daily field reports; waste manifests; information about the disturbance of subsurface materials, the type and thickness of any fill placed on site, and fill placement practices, laboratory reports, among other types of documentation. It is not advisable to separate supplemental documentation from the report.

Understand the Role of Standards

Unless they are incorporated into statutes or regulations, standard practices and standard guides developed by the American Society for Testing and Materials (ASTM) and other recognized standards-developing organizations (SDOs) are little more than aspirational methods agreed to by a consensus of a committee. The committees that develop standards may not comprise those best-qualified to establish methods and, no matter what, no standard method can possibly consider the infinite client- and project-specific variables that fly in the face of the theoretical “standard conditions” to which standard practices and standard guides apply. In fact, these variables can be so pronounced that geoenvironmental professionals who comply with every directive of an ASTM or other standard procedure could run afoul of local custom and practice, thus violating the standard of care.

Accordingly, when geoenvironmental professionals indicate in their reports that they have performed a service “in general compliance” with one standard or another, it means they have applied professional judgment

in creating and implementing a scope of service designed and performed for the specific client and project involved, and which follows some of the general precepts laid out in a referenced standard. To the extent that a report indicates “general compliance” with a standard, you may wish to speak with your geoenvironmental professional to learn more about what was and was not done.

Realize That Recommendations May Not Be Final

When provided, technical recommendations included in a geoenvironmental report are based on assumptions about actual conditions at the time of the study. The findings, conclusions, and/or recommendations are often as good as the readily available and reasonably ascertainable information, and also based on the geoenvironmental professionals' understanding of the User's needs and goals. Final recommendations can be prepared only by observing actual conditions as they are exposed. For that reason, it may be prudent to retain the geoenvironmental professional of record to observe construction and/or remediation activities on site, or to permit rapid response to unanticipated conditions. *The geoenvironmental professional who prepared the report cannot assume responsibility or liability for the report's recommendations if that professional is not retained to observe relevant site operations.*

Understand That Geotechnical Issues Have Not Been Addressed

Unless geotechnical engineering was specifically included in the scope of professional service, a geoenvironmental report is not likely to relate any pertinent findings, conclusions, or recommendations about the suitability of subsurface materials for construction purposes, especially if site remediation has been accomplished through the removal, replacement, encapsulation, or chemical treatment of on-site media (i.e., soil, groundwater, soil gas). If you plan to build on the subject site but have not yet had a geotechnical engineering study conducted, your geoenvironmental professional should be able to provide guidance about the next steps you should take. The same firm may provide the services you need.

Read Responsibility Provisions Closely

Geoenvironmental studies cannot be exact; they are based on professional judgment and opinion. Nonetheless, some clients, contractors, and others assume geoenvironmental reports are or should be unerringly precise. Such assumptions have created unrealistic expectations that have led to wholly unwarranted claims and disputes. To help prevent such problems, geoenvironmental professionals have developed a number of report provisions and contract terms that explain who is responsible for what, and how risks are to be allocated. Some people mistake these for “exculpatory clauses,” that is, provisions whose purpose is to transfer one party's rightful responsibilities and liabilities to someone else. Read the responsibility provisions included in a report and in the contract you and your geoenvironmental professional agreed to. *Responsibility provisions are not “boilerplate.”* They are important.

May 13, 2026

Town of Canton
C/o: Ms. Lisa Stinnett
85 Summer Street
Canton, North Carolina 28716

Subject: Lead-Based Paint Assessment
58 Park Street
Canton, North Carolina 28716
BLE Project Number 26-29858.02

Dear Ms. Stinnett,

Bunnell-Lammons Engineering, Inc. (BLE) facilitated a Lead-Based Paint (LBP) Assessment at the above-referenced property, herein referred to as "Site." The LBP Assessment was performed in accordance with our Proposal No. 26-29858 dated April 28, 2026. This LBP Assessment was performed for Occupational Safety and Health Administration (OSHA) purposes prior to planned demolition activities on-Site.

On May 6, 2026, BLE representatives facilitated the performance of an LBP Assessment using an X-ray Fluorescence Spectrum Analyzer (XRF) to assess the potential presence of LBPs on painted surfaces associated with the Site building. Painted surfaces were selected based on the color of the topcoat, underlying layers, and substrate on which it was painted. Readings exceeding 1.0-milligrams per centimeter squared (mg/cm^2) are considered lead-based coatings as defined by the North Carolina Department of Health and Human Service (NCDHHS). Readings below the LBP threshold of $1.0 \text{ mg}/\text{cm}^2$ are considered to have lead-containing substrates.

The following provides a summary of LBP identified during this assessment:

- Red metal I-beams throughout first and second floors
- White metal bathroom sinks throughout first and second floors in restrooms and judge's area
- Black metal roof access ladder in second floor storage closet near restroom

The complete *Lead-Based Paint Survey* report is attached as part of this letter. The confirmed LBP materials identified during this assessment should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Additionally, OSHA contractor requirements exist, and efforts should be made to prevent the potential spread and exposure of lead to the workers and the public during renovation or demolition activities. OSHA Lead Regulations do not recognize a threshold concentration of lead-paint for definition purposes. Rather, OSHA only recognizes the presence or absence of lead in defining lead containing materials. This OSHA regulation also establishes exposure levels to employees of airborne lead. The current OSHA regulations recognize an airborne Action Level of 30 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) and a Permissible Exposure Level (PEL) of $50 \mu\text{g}/\text{m}^3$ per 8-hour work day for employees. The full OSHA lead standard should be referenced for compliance.



Lead-Based Paint Assessment
21 Adams Street, Canton, NC

May 13, 2026
BLE Job Number 26-29858.02

BLE appreciates the opportunity to support your geotechnical, environmental, and construction materials testing needs. Please contact us (864) 288-1265 if you have any questions.

Sincerely,
BUNNELL-LAMMONS ENGINEERING INC.

A handwritten signature in blue ink that reads "Brian Davis". The signature is written in a cursive, flowing style.

Brian Davis
Environmental Scientist

A handwritten signature in blue ink that reads "Daniel R. Matz". The signature is written in a cursive, flowing style.

Daniel R. Matz, P.E.
Senior Environmental Engineer

Attachments: *Lead-Based Paint Survey – Former Town Hall – 58 Park Street*, prepared by Oliver Environmental Solutions, dated May 12, 2026

Lead-Based Paint Survey
Former Town Hall



Lead Based Paint Survey

Former Town Hall
58 Park Street
Canton, North Carolina 28716

Prepared for:
Mr. Brian Davis
BLE Corp
6004 Ponders Court
Greenville, South Carolina 29615

Prepared by:
Oliver Environmental Solutions, LLC
302 Gray Fox Square
Taylors, South Carolina 29687

Project Number: 260451

May 12, 2026

Mr. Brian Davis
BLE Corp.
6004 Ponders Court
Greenville, South Carolina 29615

Reference: Lead Based Paint Survey
Former Town Hall
58 Park Street
Canton, North Carolina 28716

Dear Mr. Davis:

Oliver Environmental Solutions, LLC has completed a lead-based paint (LBP) survey at the above-referenced property. The survey did not include demolition, such as jack/sledge hammering or cutting into walls, ceilings, floors, or structural members to expose possible Lead-Based Paint (LBP). Included in this report is a summary of our field activities and the results obtained.

PROJECT INFORMATION

The project area includes the former Town Hall building located at 58 Park Street in Canton, North Carolina. The two-story building is approximately 15,000 SF and was originally constructed circa 1970. The former town hall referenced above is slated for demolition and is not considered “*target housing*” or “*child occupied facilities*” as per HUD guidelines and EPA and North Carolina Department of Health and Human Services (NCDHHS), Health Hazards Control Unit (HHCU), Lead Based Paint Management Program Renovation, Repair and Painting (RRP) lead regulations. Oliver Environmental Solutions, LLC provided an LBP survey throughout the interior and exterior of the building for demolition and waste stream disposal and OSHA informational purposes. Included in this report is a summary of our field activities and the results obtained.

The objectives of the survey included the following:

- The LBP survey was performed for demolition and waste stream disposal and OSHA informational purposes by an EPA lead certified firm and EPA certified LBP risk assessor in general accordance with the EPA’s RRP Lead Program regulations and HUD guidelines and methodologies for inspection protocols.
- Identification of building components and surfaces that are coated, painted, stained, varnished, shellacked or otherwise coated throughout the interior and exterior areas of the building. Coated surfaces were evaluated based on the color of the topcoat, the underlying layers, age of construction and/or the substrate on which the paint is applied.
- In situ analysis of suspected LBPs using a X-ray Fluorescence Spectrum Analyzer (XRF) technology.
- Presenting the results in a report identifying confirmed LBPs.

METHODS

The LBP survey was completed using a SciAps X-550Pb XRF (S/N 02211) and was performed in accordance with Performance Characteristic Sheet (PCS) specifications and NIST calibration standards per HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing published in June 1995 (Chapter 7 updated in 2012) and EPA RRP lead regulations.

The LBP survey was performed by Mr. Tom Oliver (EPA LBP Risk Assessor License No. LBP-R-36342-3; Expiration Date 01/04/2027) with Oliver Environmental Solutions, LLC (EPA Lead Firm Certification No. LBP-F312078-1; Expiration Date 10/30/2028) on May 6, 2026. Surfaces that were coated, painted, stained, varnished and shellacked were selected based on estimated age of construction, color of topcoat, underlying layers and substrate on which it was painted.

The building is slated for demolition, therefore, EPA and NCDHHS RRP lead regulations do not apply to this project.

RESULTS

Surfaces were analyzed by XRF throughout the interior and exterior of the building for the presence of LBP. Currently, NCDHHS defines XRF readings on substrates equal to or in excess of 1.0 mg/cm² and 0.5% weight or greater for paint chips are considered to be LBP. Readings below the LBP thresholds are considered to have lead-containing substrates.

LBP should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Similar precautions should be used on substrates with detectable levels of lead. *XRF LBP Data Tables* are included in Appendix I of this report and identifies materials coated with LBP. XRF results indicate the surfaces presented below are considered LBP:

The following surfaces in the structure tested positive for lead in excess of the regulatory definition of 1.0 mg/cm²:

Sample #	Location of LBP	Description of LBP	Photograph #
33,34,35	Throughout 1 st & 2 nd Floors	Red Metal I Beams	2,3
72, 122, 130	Throughout 1 st & 2 nd Floors in Restrooms & Judges Area	White Metal Bathroom Sinks	4,5
131	2 nd Floor Storage Closet Near Restroom	Black Metal Roof Access Ladder	6

CONCLUSIONS

Several surfaces in the building were identified to be coated with LBP.

The building is a commercial property and will be demolished. Subsequently, it is not considered to be pre-1978 “*target housing*” or a “*child-occupied facility*” as defined by EPA and NCDHHS RRP lead regulations. Subsequently, the RRP lead regulations do not apply to this project. However, OSHA and disposal requirements exist during demolition.

Occupational Safety and Health Administration (OSHA) Lead Regulations apply to actions initiated on LBP and lead containing materials performed by workers as a course of their job duties. This regulation applies to LBP and detectable lead concentrations since OSHA does not recognize a threshold level of lead for definition purposes, only the presence or absence of lead. This regulation sets exposure levels on airborne lead and does not reference the percent lead in paint. Therefore, initial personal air monitoring should be conducted on workers performing work on surfaces which have a detectable lead concentration to satisfy the OSHA requirements. The current OSHA regulations recognize an airborne action level of thirty micrograms per cubic meter (30 $\mu\text{g}/\text{m}^3$) during an eight-hour workday and a permissible exposure level of fifty micrograms per cubic meter (50 $\mu\text{g}/\text{m}^3$) for employees. If a baseline exposure lower than the OSHA Action Level of 30 $\mu\text{g}/\text{m}^3$ is established, personal air monitoring may be terminated. The full OSHA lead standard (29 CFR 1926.62) should be referenced for compliance.

LBP and materials containing LBP should not be sanded, torched, grinded on, or disturbed in a manner that will create a dust hazard. Additionally, LBP materials should be maintained and kept in good condition to prevent paint deterioration and potential dust exposure. Routine cleaning, proper disposal of visible paint chips and visual monitoring for non-intact LBP should be implemented. Similar precautions should be used on substrates with detectable levels of lead. Prohibited practices on LBP during activities that could disturb LBP or “lead containing” substrates include:

- Open flame burning or torching (includes propane-fueled heat grids).
- Machine sanding or grinding without HEPA local vacuum exhaust tool.
- Abrasive blasting or sandblasting without HEPA local vacuum exhaust tool.
- Heat guns operating above 1100° F or charring the paint.
- Dry scraping.
- Paint stripping in a poorly ventilated space using volatile stripper.

RECOMMENDATIONS

The former Town Hall building is slated for demolition and the EPA and NCDHHS RRP lead regulations do not apply to this project. Demolition may proceed with consideration of Occupational Safety and Health Administration (OSHA) lead regulations and disposal requirements. Oliver Environmental Solutions, LLC recommends the following:

- Follow OSHA regulation 29 CFR 1926.62 during demolition activities.
- Metal I-beams, roof access ladder and sinks may be disposed of in a North Carolina Construction & Demolition (C&D) Landfill or recycled at a scrap metal recycling facility. However, the landfill and/or recycling facility should be contacted to determine their specific disposal/recycling requirements.

Please note that this document is not a specification for lead removal. It does not contain means and methods for abatement. If you are planning a lead-based paint abatement project, please contact Oliver Environmental Solutions, LLC to discuss the requirements. Use of this document without the express written consent of Oliver Environmental Solutions, LLC is at the sole risk of the user and/or abatement contractor. **Contractors must verify material amounts prior to bidding or removal.** This report summarizes our evaluation of the conditions observed at the site.

The findings prepared by Oliver Environmental Solutions, LLC are based upon testing performed in the project building. Additional LBP may exist (undetected) in other areas due to their inaccessibility or due to the limited nature of our testing. Our survey procedures and recommendations are based on the guidelines presented in EPA, NCDHHS or OSHA regulations.

If you have questions, comments or concerns about this proposal or anything else, please reach out to me at (864) 640-5127 or at tomoliverenv@outlook.com. Thank you for this opportunity to be a part of your project and I look forward to our continued relationship.

Respectfully submitted,
OLIVER ENVIRONMENTAL SOLUTIONS, LLC



Tom Oliver
President

Appendix I	XRF LBP Data Tables
Appendix II	Photographic Log
Appendix III	EPA LBP Firm & Risk Assessor Certification
Appendix IV	XRF PCS Documentation

APPENDIX I
XRF LBP DATA TABLES

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
1		Calibration			1.1
2		Calibration			1.0
3		Calibration			1.1
4	Exterior	Wall/siding	Brown	Brick	0.0
5	Exterior	Window frame	Black	Metal	0.0
6	Exterior	Window frame bottom	Black	Metal	0.0
7	Exterior	Column	Tan	Concrete	0.0
8	Exterior	Wall/siding	Brown	Brick	0.0
9	Exterior	Door	Black	Metal	0.0
10	Exterior	Door frame	Black	Metal	0.0
11	Exterior	Window frame	Black	Metal	0.0
12	Exterior	Window frame bottom	Black	Metal	0.0
13	Exterior	Column	Tan	Concrete	0.0
14	Exterior	Wall/siding	Brown	Brick	0.0
15	Exterior	Window frame	Black	Metal	0.0
16	Exterior	Window frame bottom	Black	Metal	0.0
17	Exterior	Teller window	Silver	Metal	0.0
18	Exterior	Column	Tan	Concrete	0.0
19	Exterior	Wall/siding	Brown	Brick	0.0
20	Exterior	Door	Black	Metal	0.0
21	Exterior	Door frame	Black	Metal	0.0
22	Exterior	Window frame	Black	Metal	0.0
23	Exterior	Window frame bottom	Black	Metal	0.0
24	Exterior	Column	Tan	Concrete	0.0
25	Roof	Roof overhang	Green	Metal	0.0

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
26	Roof	HVAC wind barrier	Green	Metal	0.0
27		Pipe	White	Metal	0.0
28	1st Floor Open Area	Floor	White	Concrete	0.0
29		Floor	White	Concrete	0.0
30		Floor	White	Concrete	0.0
31		Door frame	Black	Metal	0.0
32		Window frame	Black	Metal	0.0
33		I Beam	Red	Metal	1.0
34		I Beam	Red	Metal	1.4
35		I Beam	Red	Metal	1.1
36		Wall framing	Black	Metal	0.0
37		Wall framing	Black	Metal	0.0
38		Wall framing	Black	Metal	0.0
39		Window base	Black	Metal	0.0
40		Window base	Black	Metal	0.0
41		Upper wall	White	Dry wall	0.0
42		Upper wall	White	Dry wall	0.0
43		Teller window frame	White	Wood	0.0
44		Teller money box	Black	Metal	0.0
45		Teller money box	Tan	Metal	0.0
46		Vault door	Black	Metal	0.0
47		Vault frame	Black	Metal	0.0
48		Vault wall	White	Concrete	0.0
49		Vault ceiling	White	Concrete	0.0
50		Elevator door	Black	Metal	0.0

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
51	1st Floor Open Area	Elevator door frame	Black	Metal	0.0
52		Ceiling grid	White	Metal	0.0
53	1st Floor Open Area	Column	White	Plaster	0.0
54		Wall	White	Plaster	0.0
55		Door frame	Black	Metal	0.0
56		Door frame	Black	Metal	0.0
57		Door frame	Black	Metal	0.0
58		Window frame	Black	Metal	0.0
59		Window frame	Black	Metal	0.0
60		Window frame	Black	Metal	0.0
61		Stair tread	White	Concrete	0.0
62		Stair riser	Black	Metal	0.1
63		Stair stringer	Black	Metal	0.1
64		Stair post	Black	Metal	0.1
65		Stair hand rail	Black	Metal	0.1
66		Stair hand rail	Brown	Wood	0.0
67		Stairway wall	White	Plaster	0.0
68		Bathroom stall	White	Metal	0.0
69		Bathroom wall	Gray	Ceramic tile	0.4
70		Bathroom toilet	White	Porcelain	0.0
71		Bathroom urinal	White	Porcelain	0.0
72		Bathroom sink	White	Metal	6.6
73	Ceiling grid	Red	Metal	0.0	
74	1st Floor Open Area Utility Closet	Utility closet wall	White	CMU block	0.0
75	Utility closet ceiling	White	Concrete	0.0	

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)	
76	1st Floor Open Area Utility Closet	Utility closet pipes	White	Metal	0.0	
77		Utility closet floor	Gray	Concrete	0.0	
78	1st Floor Open Area	Stair stringer	Red	Metal	0.1	
79		Reception window frame	White	Wood	0.0	
80		Wall	Gray	Plaster	0.0	
81		Wall	White	CMU block	0.0	
82		Prison cell door	White	Metal	0.0	
83		Prison cell door frame	White	Metal	0.1	
84		Utility door	White	Metal	0.1	
85		Utility door frame	Black	Metal	0.0	
86		Evidence area door	White	Metal	0.1	
87		Evidence area door frame	Black	Metal	0.1	
88		Solitary cell door	White	Metal	0.1	
89		Solitary cell door frame	Black	Metal	0.0	
90		Evidence area wall	White	Concrete	0.0	
91		Evidence area ceiling	White	Concrete	0.0	
92		Stairway door	Brown	Wood	0.0	
93		2nd Floor Main Hallway	Wall	White	Plaster	0.0
94			Floor	White	Concrete	0.0
95	Ceiling grid		White	Metal	0.0	
96	Elevator door		Black	Metal	0.0	
97	Elevator frame		Black	Metal	0.0	
98	Door (double)		Brown	Wood	0.0	
99	Door (double) frame		Black	Metal	0.0	
100	Window		Black	Metal	0.0	

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm ²)
101	2nd Floor Main Hallway	Door (single)	Brown	Wood	0.0
102		Door (single) frame	Black	Metal	0.0
103	2nd Floor Court Room	Wall	White	Plaster	0.0
104		Wall	Brown	Wood	0.0
105		Ceiling grid	Tan	Metal	0.0
106		Floor	Gray	Carpet	0.0
107		Chair frame	Black	Metal	0.0
108		Window frame	Black	Metal	0.0
109		Window frame bottom	Black	Metal	0.0
110		Door	Brown	Wood	0.0
111		Door frame	Black	Metal	0.0
112		Jury/window hand rail	Brown	Wood	0.0
113		Judge/witness stand	Brown	Wood	0.0
114	2nd Floor Judge Office Area	Wall	White	Plaster	0.0
115		Ceiling grid	Tan	Metal	0.0
116		Floor	White	Floor tile	0.0
117		Door	Brown	Wood	0.0
118		Door frame	Black	Metal	0.0
119		Window frame	Black	Metal	0.0
120		Window frame bottom	Black	Metal	0.0
121		Toilet	White	Porcelain	0.0
122		Sink	White	Metal	6.4
123		Book case	Brown	Wood	0.0
124	2nd Floor Bathrooms	Wall	Gray	Ceramic tile	0.5
125		Ceiling grid	Tan	Metal	0.0

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm ²)	
126	2nd Floor Bathrooms	Stalls	White	Metal	0.0	
127		Floor	White	Concrete	0.0	
128	2nd Floor Bathrooms	Toilet	White	Porcelain	0.0	
129		Urinal	White	Porcelain	0.0	
130		Sink	White	Metal	6.4	
131		Roof access ladder	Black	Metal	4.7	
132		Wall	White	Plaster	0.0	
133		Janitor drain basin	White	Concrete	0.0	
134		Door	Brown	Wood	0.0	
135		Door frame	Black	Metal	0.0	
136		2nd Floor Administration Office Area	Door	Brown	Wood	0.0
137			Door	Brown	Wood	0.0
138	Door		Brown	Wood	0.0	
139	Door frame		Black	Metal	0.0	
140	Door frame		Black	Metal	0.0	
141	Door frame		Black	Metal	0.1	
142	Wall		White	Plaster	0.0	
143	Wall		White	Plaster	0.0	
144	Wall		White	Plaster	0.0	
145	Wall		White	Plaster	0.0	
146	Wall		White	Plaster	0.3	
147	Wall		White	Plaster	0.0	
148	Window frame		Black	Metal	0.0	
149	Window frame		Black	Metal	0.1	
150	Window frame	Black	Metal	0.1		

**FIELD DATA SHEET
XRF LBP ANALYSIS**

Project Name: BLE Former Town Hall LBP Survey

Sampled By: Tom Oliver

Project Location: 58 Park Street, Canton, North Carolina 28716

Project Manager: Tom Oliver

Project Number: 260451

Date: 5/6/2026

Sample No.	Room/Area	Component	Color	Substrate	Analytical Result (mg/cm2)
151	2nd Floor Administration Office Area	Window frame bottom	Black	Metal	0.0
152		Window frame bottom	Black	Metal	0.0
153		Window frame bottom	Black	Metal	0.0
154		Ceiling grid	Tan	Metal	0.0
155		Ceiling grid	Tan	Metal	0.0
156		Ceiling grid	Tan	Metal	0.0
157		Floor	Gray	Carpet	0.0
158		Floor	Gray	Carpet	0.0
159		Floor	White	Floor tile	0.0
160		Floor	Gray	Carpet	0.0
161		Floor	Brown	Wood plank	0.0
162		Wooden cabinet	Brown	Wood	0.0
163		Wall	Gray	Wood	0.0
164		Wall	Brown	Wood	0.0
165		Wall	Black	Wood	0.0
166		Cabinets	Brown	Metal	0.1
167		Wall	Blue	Plaster	0.0
168	Calibration				1.0
169	Calibration				1.0
170	Calibration				1.0

Bold = LBP

APPENDIX II
PHOTOGRAPHIC LOG



Photo 1 – The former Town Hall located at 58 Park Street, Canton, NC 28716



Photo 2 – Red metal I-beams throughout the 1st & 2nd floor - LBP



Photo 3 – Red metal I-beams throughout the 1st & 2nd floor - LBP



Photo 4 – Typical view of a white metal sink in the bathrooms

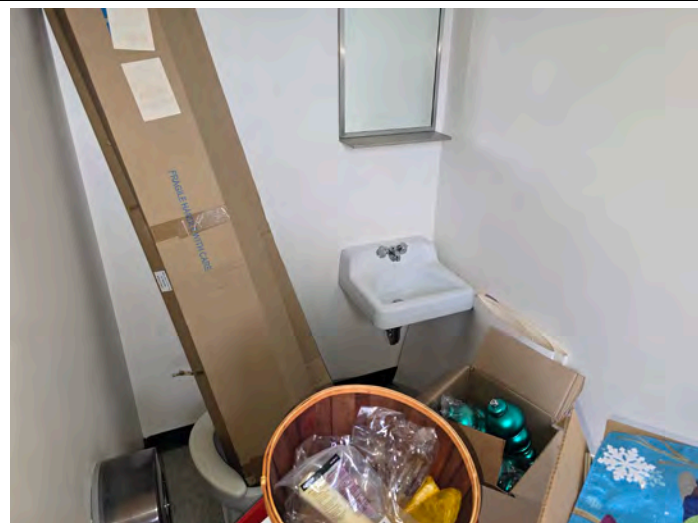


Photo 5 – Typical view of a white metal sink in the Judges area

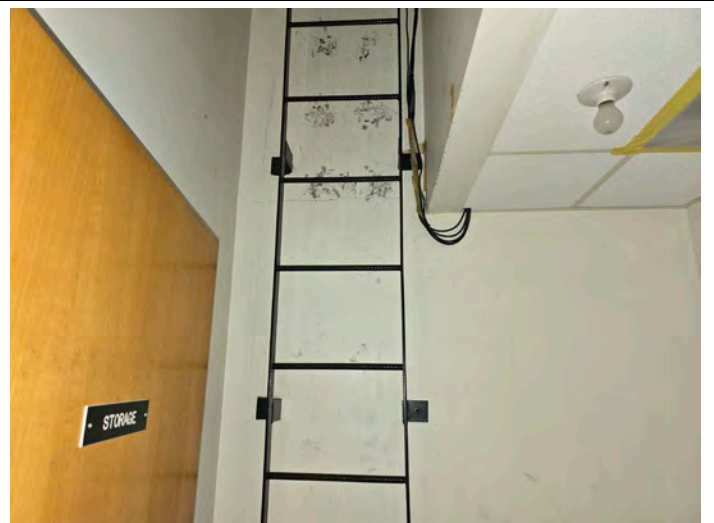


Photo 6 – Black metal roof access ladder near the 2nd floor bathrooms - LBP

APPENDIX III

EPA LBP FIRM & RISK ASSESSOR CERTIFICATION

United States Environmental Protection Agency

This is to certify that

Oliver Environmental Solutions, LLC

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

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires October 30, 2028

LBP-F312078-1

Certification #

October 16, 2025

Issued On



Marc Edmonds, Supervisor

Existing Chemicals Risk Management Branch 2.

United States Environmental Protection Agency

This is to certify that



Thomas H Oliver

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

Risk Assessor

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires January 04, 2027

LBP-R-36342-3

Certification #

December 21, 2023

Issued On



A handwritten signature in black ink, appearing to read "Adrienne Priselac".

Adrienne Priselac, Manager, Toxics Office

Land Division

APPENDIX IV

XRF PCS DOCUMENTATION

Performance Characteristic Sheet

EFFECTIVE DATE: February 1, 2022

MANUFACTURER AND MODEL:

Make: **SciAps**
 Models: **Model X-550**
 X-Ray Source: **Rhodium (Rh) or Gold (Au) Anode**

FIELD OPERATION GUIDANCE

ACTION LEVEL SETTING IN THE INSTRUMENT: 1.0 mg/cm²

NOTE: This PCS is not applicable at other Action Level settings; the Action Level setting of the instrument must be 1.0 mg/cm² to use this PCS.

OPERATING PARAMETERS:

Timed mode: fixed 10-second reading.
 Quick mode: variable-time reading (approximately 2-6 seconds).

XRF CALIBRATION CHECK LIMITS:

0.8 to 1.2 mg/cm² (inclusive) on NIST SRM 2579 (1.02 mg/cm²)/NIST SRM 2573, or equivalent

SUBSTRATE CORRECTION:

Not applicable

INCONCLUSIVE RANGE OR THRESHOLD:

Rh Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	THRESHOLD (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	0.5
	Concrete	0.5
	Drywall	0.5
	Metal	0.5
	Plaster	0.5
	Wood	0.5
Au Anode (Timed or Quick) READING DESCRIPTION	SUBSTRATE	INCONCLUSIVE RANGE (mg/cm ²)
Results not corrected for substrate bias on any substrate	Brick	(0.4-0.6)
	Concrete	(0.4-0.6)
	Drywall	(0.4-0.6)
	Metal	(0.4-0.6)
	Plaster	(0.4-0.6)
	Wood	(0.4-0.6)

BACKGROUND INFORMATION

EVALUATION DATA SOURCE AND DATE:

This sheet is supplemental information to be used in conjunction with Chapter 7 of the HUD *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, 2012 Edition ("HUD Guidelines"). Performance parameters shown on this sheet are calculated using test results on building components in the HUD archive. Testing was conducted on 146 test samples in February 2022, with two separate instruments of each Anode type, operated in both Timed and Quick modes.

OPERATING PARAMETERS

Performance parameters shown in this sheet are applicable only when properly operating the instrument using the manufacturer's instructions and procedures described in Chapter 7 of the HUD Guidelines.

XRF CALIBRATION CHECK:

The calibration of the XRF instrument should be checked using the paint film nearest 1.0 mg/cm² in the NIST Standard Reference Material (SRM) used (e.g., for NIST SRM 2579, use the 1.02 mg/cm² film; for NIST SRM 2579a, use film 2573 (1.04 mg/cm²)).

If the average (rounded to 1 decimal place) of three readings is outside the acceptable calibration check range, follow the manufacturer's instructions to bring the instrument into control before XRF testing proceeds.

EVALUATING THE QUALITY OF XRF TESTING:

Randomly select ten testing combinations for retesting from each house or from two randomly selected units in multifamily housing.

Conduct XRF re-testing at the ten testing combinations selected for retesting.

Determine if the XRF testing in the units or house passed or failed the test by applying the steps below. Compute the Retest Tolerance Limit by the following steps:

Determine XRF results for the original and retest XRF readings. In single-family and multi-family housing, a result is defined as a single reading. Therefore, there will be ten original and ten retest XRF results for each house or for the two selected units.

Calculate the average of the original XRF result and the retest XRF result for each testing combination.

Square the average for each testing combination.

Add the ten squared averages together. Call this quantity C.

Multiply the number C by 0.0072. Call this quantity D.

Add the number 0.032 to D. Call this quantity E.

Take the square root of E. Call this quantity F.

Multiply F by 1.645. The result is the Retest Tolerance Limit.

Compute the average of all ten original XRF readings.

Compute the average of all ten re-test XRF readings.

Find the absolute difference of the two averages.

If the difference is less than the Retest Tolerance Limit, the inspection has passed the retest. If the difference of the overall averages equals or exceeds the Retest Tolerance Limit, this

procedure should be repeated with ten new testing combinations. If the difference of the overall averages is equal to or greater than the Retest Tolerance Limit a second time, then the inspection should be considered deficient.

Use of this procedure is estimated to produce a spurious result approximately 1% of the time. That is, results of this procedure will call for further examination when no examination is warranted in approximately 1 out of 100 dwelling units tested.

TESTING TIMES:

The reading time in Archive tests was 10 seconds in Timed mode and from 2-6 seconds in Quick mode, for both the Rh Anode and Au Anode.

CLASSIFICATION OF RESULTS:

XRF results for the Rh Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.5 mg/cm² and **negative** if they are **less than** 0.5 mg/cm².

XRF results for the Au Anode in Timed or Quick mode are classified as **positive** if they are **greater than or equal** to 0.6 mg/cm², **negative** if they are **less than or equal** to 0.4 mg/cm² and **inconclusive** if they are **greater** than 0.4 mg/cm² **AND less than** 0.6 mg/cm².

DOCUMENTATION:

A report titled *Methodology for XRF Performance Characteristic Sheets* (EPA 747-R-95-008) provides an explanation of the statistical methodology used to develop Performance Characteristic Sheets at the Federal standard (Action Level) of 1.0 mg/cm² and provides empirical results from using the recommended inconclusive ranges or thresholds for specific XRF instruments. The report may be downloaded at <http://www2.epa.gov/lead/methodology-xrf-performance-characteristic-sheets-epa-747-r-95-008-september-1997>. The methodology was subsequently generalized by QuanTech for application to other Action Levels.