

Environmental & Disaster Restoration, Inc.

ECOS Environmental – Glenwood Springs, Colorado 6690 Highway 82 Glenwood Springs, CO 81601 Office – (970) 945-4407

> info@ecosenvironmental.com www.ecosenvironmental.com

ASBESTOS INSPECTION REPORT

CLIENT:	Beall, Benjamin
ADDRESS:	38600 Main St.
	Milner, CO, 80487
EMAIL:	ben@aquaworksdbo.com
PHONE:	1-970-846-1513
ECOS JOB NUMBER:	S-23-0029-AT
PROJECT LOCATION:	Same Location
DATE OF INSPECTION:	12-12-2023
DATE OF REPORT:	01-05-2023



SUMMARY

ECOS Environmental & Disaster Restoration (ECOS) was contracted to conduct a limited asbestos inspection at the above referenced location to **determine if there is asbestos containing building material (ACBM)**, **in building materials located in the control room area** of the property for a proposed renovation. The inspection was performed in accordance with the Standards of Practice of the Colorado Regulation 8 Part B in effect at the time of this Inspection. This inspection is not intended to be technically exhaustive. The inspection includes all accessible building materials in the affected location; however, should any additional building materials be discovered during demolition, those materials must be sampled and analyzed prior to continuing with the work. Two (2) samples were collected of the suspect materials, as listed in the Lab Data Table located on Page 10 of this report.

The Inspector has prepared this written Asbestos Inspection Report for the sole use and benefit of the client. The asbestos inspection report shall identify, report, and make recommendations for future evaluation. Client agrees to read the entire Asbestos Inspection Report when received and shall promptly contact the Inspector with questions and/or concerns regarding the reported findings. The use of this report and information contained herein by others, in whole or in part, is not authorized without the written mutual consent of the client and Asbestos Consulting Firm, ECOS Environmental.

INSPECTOR QUALIFICATIONS

This inspection was performed by Tobie Taylor, Colorado State Department of Public Health and Environment Certification Number 21893.

SAMPLE ANALYSIS PROCEDURE

ECOS collected bulk samples, in a random and representative manner, of the homogenous areas as determined by the above-named Inspector, an EPA/State of Colorado Certified Asbestos Building Inspector. A simplified sampling scheme was utilized as described in EPA pink book table 2. Samples were collected by using wet techniques to minimize damage to the suspect asbestos containing building material (ACBM) and subsequent fiber release. These wet methods may entail wetting the surface of the material to be sampled with water mist from a spray bottle or contained using a plastic bag. The sample container is pressed tightly against the surface of the material being sampled and with a twisting motion, the sampler is slowly pushed into the material for collection. The container is then labeled with a unique sample ID number and marked on the Sampling Area Diagram. The Inspector cleans the tools and equipment, following collection of each sample to minimize cross-contamination between sample collecting. The Inspector assumes materials in inaccessible locations were homogenous to those in accessible locations, to limit disturbance during the sampling process. All samples were placed in sealed, labeled containers, with sample descriptions and locations were recorded. Samples were delivered under a chain of custody for analysis to approved lab.

Performance of this asbestos inspection is intended to reduce, but not eliminate, uncertainty regarding the presence of ACBM in connection with the above referenced property. No guarantee is expressed or implied that all ACBM was identified in the inspection. Therefore, ECOS Environmental cannot be held



accountable for restrictions placed on us by the client, conditions or information unknown, or areas inaccessible at the time of the inspection.

TRANSMITTAL OF ASBESTOS SURVEY REPORT

One copy of the building or structure asbestos survey shall be immediately transmitted by the owner as follows:

- One copy of the completed asbestos survey shall be sent by the owner, or their agent, to the local government entity charged with issuing a permit for actions such as demolition, renovation, remodeling or repair work under applicable State or local laws.
- The completed asbestos survey shall be kept on the construction site with the asbestos notification and variance, if required, throughout the duration of the asbestos project and any associated demolition, removation, remodeling, or repair project.

ASBESTOS SURVEY INFORMATION

The asbestos survey shall, at a minimum, identify and assess with due diligence, the locations, quantities, friability, and conditions of all building material types at the affected area of the building or structure. The certified asbestos building inspector is responsible for identification and assessment of all types of materials within the affected area of the building or structure.

All building materials visually assessed shall be assumed to be asbestos containing building materials (ACBM) unless bulk sampling is conducted as per standard EPA and OSHA accepted methodologies. The subsequent analysis is performed by a laboratory with the requirements and analyses, which satisfy both CO STATE ELAP and Federal regulations. This includes multi- layered sample analyses to document non-asbestos containing material.

The asbestos survey shall also include the building or structure name, address, the owner's name and address, or the name and address of the owner's agent, the name of the firm performing the asbestos survey and a copy of the firm's current asbestos handling license. In addition, the names of the certified inspector(s) performing the survey, a copy of their current individual asbestos handling certificate, the dates of the asbestos survey, a listing of homogeneous areas identifying which ones are ACBM, all laboratory analysis reports for bulk samples collected, and copies of the appropriate certifications for the laboratory used for analysis of samples taken during the asbestos survey.

UNIDENTIFIED AND UNASSESSED ASBESTOS

When any construction activity such as demolition, remodeling, renovation or repair work reveals suspect ACBM not identified in the asbestos survey, or has not been identified by OSHA or EPA requirements, all activities shall cease in the area where the suspect ACBM is found. Unassessed suspect ACBM shall be assumed, treated, and handled as ACBM, unless proven otherwise by standard EPA and OSHA accepted methods. To document non-asbestos containing material, analysis must be performed by a laboratory with the requirements and analysis which satisfy both CO STATE ELAP and Federal regulations.



ASBESTOS ABATEMENT

If the asbestos survey finds asbestos containing building material (ACBM) in the area of the building or structure to be demolished, renovated, remodeled, or have repair work, the owner or the owner's agent shall conduct, an Asbestos Abatement performed by a licensed General Asbestos Contractor (GAC) in accordance with all standards set forth.

All building or structure owners and GACs on a demolition, removation, remodeling, or repair project shall inform all trades about the ACBM on the work site.

All ACBM impacted by the demolition, renovation, remodeling, or repair project shall be removed prior to access of other uncertified trades or personnel. No demolition, renovation, remodeling, or repair work shall take place by the owner or the owner's agent prior to the completion of the asbestos abatement in accordance with Regulation 8 Part B. For multi-phased work, access is restricted for uncertified trades or personnel in the area where the asbestos abatement is taking place. Upon completion of the asbestos abatement, other trades and personnel will have access to the work site. For demolition projects exempt from asbestos survey requirements due to being structurally unsound, the demolition is considered an asbestos abatement.

ASBESTOS PROJECT

An asbestos project is any work involving the removal, encapsulation, enclosure, repair, or disturbance of friable or non-friable asbestos, or any handling of ACBM which may result in the release of asbestos fibers. An asbestos project shall include any disturbance of asbestos fibers, planning, asbestos survey, project design, background air sampling, gross removal, cleanup, the handling of all ACBM, inspection, final cleaning, air clearance, and final waste removal from site. An asbestos project starts with Phase I when the planning, asbestos survey, and design work begins as required. The project shall not be considered completed until Phase II D is complete. (See Table 1 below).

Phase I (Prior to Asbestos Abatement Contractor)			Phase II Start -> Abatemer	nt -> End	
Α	В	Α	В	С	D
Asbestos survey, planning, and design	Background air sampling	Regulated abatement work area(s) preparation and enclosure construction	Asbestos handling including gross removal or abatement, initial cleans, and waste	Final cleaning and clearance air samples	Final waste removal from site
	Star	rt -> Asbestos Pro	ject ->Final Clearand	ce	

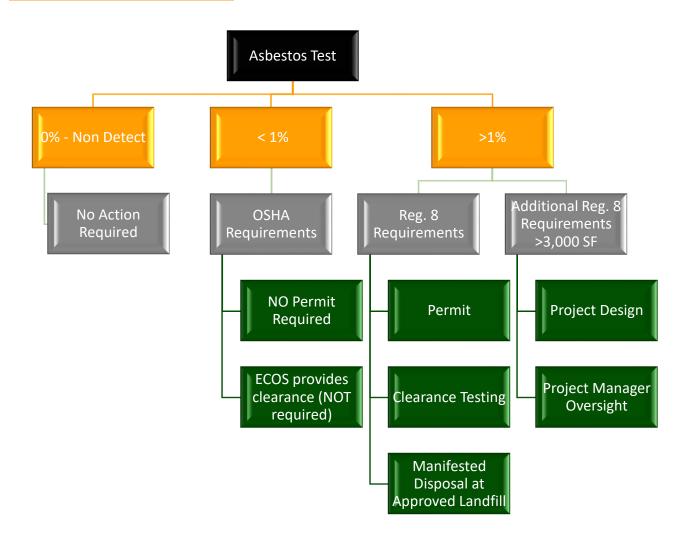


ASBESTOS ABATEMENT TRIGGER LEVELS

An asbestos abatement in a Single-Family Residential Dwelling (SFRD) less than 32 square feet, 50 linear feet on pipes, or the volume equivalent of a 55-gallon drum is regulated by OSHA in **29 CFR 1926.1101**. An abatement of materials greater than these **trigger levels** are regulated by the Colorado Department of Public Health & Environment (CDPHE). These regulations are found in the **Colorado Regulation 8, Part B.**

In Public and Commercial Buildings, the trigger levels are 160 square feet, 260 linear feet on pipes, or the volume equivalent of a 55-gallon drum.

In school buildings, any amount of damage to or removal of ACBM to greater than 3 square feet or 3 linear feet on pipes must be handled in accordance with the Colorado Regulation 8 and **AHERA** regulations.



ASBESTOS SURVEY FLOW CHART



Environmental & Disaster Restoration, Inc.

Homogenous areas sampling requirement: SF= Square Footage. LF= Linear Footage

HOMOGENOUS MATERIAL TYPE	<u>QUANTITIES</u>	Minimum # of samples
SURFACING MATERIAL	0 TO < 1,000 SF	3
	1,000 to 5,000 sf	5
	>5,000 SF	7
BULK SAMPLES OF MATERIALS WITH SURFACING MATERIALS	0 TO < 1,000 SF	3
SURFACING MATERIALS —	1,000 to 5,000 sf	5
	>5,000 SF	7
THERMAL SYSTEM INSULATION	EACH MATERIAL	3
	PATCH < 6 SF, LF	1
MISCELLANEOUS MATERIALS	EACH MATERIAL	2

ASBESTOS REMOVAL CATEGORIES

Category I Non-Friable ACM: - Asbestos-containing packings, gaskets, resilient floor covering, and asphalt roofing materials, etc. containing more than one percent 1% asbestos when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Category II Non-Friable ACM: - Any material, excluding Category I Non-Friable ACM, containing more than one percent 1% asbestos when dry cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Class I Asbestos Work: OSHA term - involves the abatement of Thermal Systems Insulation (TSI) and Surfacing ACBM and PACM.

Class II Asbestos Work: OSHA term - involves the abatement of ACBM which is not TSI or Surfacing material. This includes, but is not limited to, the removal of ACBM wallboard, floor tile and sheeting, roofing and siding shingles, and construction mastics.

Class III Asbestos Work: OSHA term - meaning Repair and Maintenance operations, where no more than a minor quantity of ACBM, including TSI and Surfacing ACBM and PACM, is likely to be disturbed.

Class IV Asbestos Work: OSHA term - meaning Maintenance and Custodial Activities during which employees contact but do not disturb ACBM or PACM and activities to clean up non-ACBM dust, waste and debris resulting from Class I, II and III activities.



DEFINITIONS

AHERA: ASBESTOS HAZARD EMERGENCY RESPONSE ACT

Asbestos Containing Material (ACM): material containing more than 1% asbestos.

Asbestos Containing Building Material (ACBM): means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM found in or on interior structural members or other part of a school building or state building.

Asbestos: A generic name given to several naturally occurring hydrated mineral silicates possessing a unique crystalline structure. They are incombustible in air and are separable into fibers. Asbestos includes the asbestiform varieties of chrysotile, crocidolite, amosite (cummingtonite-grunerite), anthophyllite, tremolite and actinolite.

Asbestos Abatement: Procedures to control fiber release from asbestos material. This includes removal, encapsulation, enclosure, repair, and disturbance of friable asbestos or any handling of asbestos material that may result in the release of asbestos fibers.

Asbestos Consulting Firm (ACF): any person who performs or offers to perform any of the following activities, as required by Regulation 8, Part B, in the state of Colorado: asbestos building inspection and bulk sampling, development of asbestos management plans, air monitoring for asbestos fibers, development of asbestos project designs, and project management.

Asbestos Laboratory: any person who performs or offers to perform asbestos analysis of bulk or air samples as required by Regulation 8, Part B in the state of Colorado.

Asbestos Spill: any release of asbestos fibers due to a breach of the containment barrier or an abatement project, or due to any cause other than asbestos abatement.

Assessment: an evaluation of the condition of ACM or ACBM, or suspected ACM or ACBM, which determines the need for a response action.

Building Owner: The person in whom legal title to the premises is vested unless the premises are held in land trust, in which instance building owner means the person in whom beneficial title is vested.

Certified: holding a certificate issued pursuant to this regulation.

Emergency: An unexpected situation or sudden occurrence of a serious and urgent matter which demand immediate action and constitutes a threat to life, health or may cause major damage to a property. Delay of a contract does not constitute an emergency, nor are demolition projects emergencies unless the facility has been declared in imminent danger of collapse by a government entity.

Friable: the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. Friable includes previously nonfriable material after such previously nonfriable material becomes



damaged or disturbed to the extent when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

General Abatement Contractor (GAC): any certified person who performs or offers to perform asbestos abatement.

Homogenous Area: an area of surfacing material, thermal system insulation material, or miscellaneous material uniform in color, texture, and after due diligence on the part of the Certified Asbestos Building Inspector, appears or has been confirmed to have the same date of application, and is unlikely to consists of more than one type, or formulation, of material.

Inspection: an activity undertaken to determine the presence or location, or to assess the condition of, friable or non-friable ACM or ABCM or suspected ACM or ACBM, whether by visual or physical examination, or by collecting samples of such material. This term includes re-inspections of friable and non-friable known or assumed ACM or ACBM which has been previously identified.

Major Asbestos Spill: an asbestos spill involving the disturbance of friable ACM in an amount greater than the trigger levels.

Minor Asbestos Spill: an asbestos spill involving the disturbance of ACM in an amount less than or equal to the trigger levels.

Miscellaneous Material – building material on components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.

Nonfriable: material which, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure. Damaged nonfriable material or nonfriable materials in poor condition may become friable.

OSHA: Occupational Safety and Health Administration

Polarized Light Microscopy (PLM): An optical microscopic technique used to distinguish between different types of asbestos fibers by their shape and unique optical properties.

Project: planned work or activity to be finished over a period of time and is intended to achieve a particular purpose. Calculation to determine if activities required under Regulation 8, Part B, will exceed trigger levels id done by summing up all quantities of ACM present in the building will be directly impacted/damaged by the planned work will occur during a particular project. Building owners or contractors may not avoid the requirement of Regulation 8, Part B by breaking up a project to remain below trigger levels.

Repair: Corrective action using required work practices to control fiber release from damaged asbestos material.



Surfacing Material – material sprayed on, troweled on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

Thermal System Insulation (TSI) – material applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

Transmission Electron Microscopy (TEM): an analytical technique used for the definitive identification of asbestos. This technique can be used for both air and bulks sample analyses as allowed by this regulation.

Trigger Levels: The minimum amounts of ACBM required to trigger the state and OSHA regulations.



HOMOGENOUS AREAS SAMPLED DURING INSPECTION

Sample	MATERIAL TYPE	Material	LOCATION	DETECT?	% ACBM	Friability	Condition	POT. FOR DIST.	ASSESSMENT CAT.	# OF SAMPLES	APPR. SQFT
CB1	М	Cove base and mastic	West wall	Ν	0	Ν	G	SD		2	12
CB2	М	Cove base and mastic	Southeast wall	Ν	0	Ν	G	SD		2	

MATERIALS ARE GIVEN A SIGNIFICANT POTENTIAL FOR DISTURBANCE SO THE CONTRACTOR MAY DEMO THE BUILDING.

KEY:

MATERIAL TYPE

S= SURFACING TSI= THERMAL SYSTEMS INSULATION M= MISCELLANEOUS

CONDITION

G= NO VISIBLE DAMAGE

D= visible damage <10% over entire material or 25% localized

SD= visible damage >10% over entire material or 25% localized

FRIABLE CATEGORY

F= FRIABLE MATERIAL; MATERIALS THAT CAN CRUMBLE OR BE REDUCED TO POWDER BY HAND PRESSURE NFI= CATEGORY I NON-FRIABLE MATERIAL; MATERIALS THAT CANNOT BE CRUMBLED OR REDUCED TO POWDER BY HAND PRESSURE THAT DO NOT INCLUDE CATEGORY I NON-FRIABLE MATERIALS.

POTENTIAL FOR DISTURBANCE

L= LOW POTENTIAL FOR DAMAGE

D= POTENTIAL FOR DAMAGE

SD= POTENTIAL FOR SIGNIFICANT DAMAGE

ASSESSMENT CATEGORIES

1= DAMAGED OR SIGNIFICANTLY DAMAGED TSI ACM

2= DAMAGED FRIABLE SURFACING ACM

3= SIGNIFICANTLY DAMAGED FRIABLE SURFACING ACM

4= DAMAGED OR SIGNIFICANTLY DAMAGED FRIABLE MISC. ACM

5= ACM WITH POTENTIAL FOR DISTURBANCE

6= ACM WITH POTENTIAL FOR SIGNIFICANT DISTURBANCE

7= ANY REMAINING FRIABLE ACM OR FRIABLE SUSPECT ACM



INVENTORY

SAMPLE	HOMOGENOUS AREA	LOCATION/FUNCTIONAL SPACE	DESCRIPTION
CB	Area 1	CONTROL ROOM	COVE BASE AND MASTIC

CONCLUSION

A visual inspection was completed of building materials within the control room for the proposed demolition. Two (2) samples of suspect materials were collected and sent to Aerobiology Laboratory in Golden, CO, for analysis using Polarized Light Microscopy (PLM).

• ALL SAMPLES WERE FOUND TO BE NON-DETECT OF ANY ASBESTOS CONTAINING MATERIAL.



LAB RESULTS

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'lient Name treet Address ity, State ZIP ittn: 'lient Project Name :	ECOS Environmental 6690 HWY 82 Glenwood Springs, CO 81601 Tobie Taylor S-23-0029-AT / 38600 Main St., Milner, CO			TESTING TESTING VLAP Lab Code 20086	10-0			Date Collected: Date Received: Date Analyzed: Date Reported: Project ID:	ed: 12/14/2023 ed: 12/20/2023 ed: 12/21/2023	
est Requested: lethod:	3002, Asbestos in Bu EPA 600/R-93/116: N	•	oestos in Bulk Building Materials, EPA 40 CFR	Appendix E to Subp	art E of Part 763, Interin	n Method for Asbestos in B	ulk Insulation S	amples		
Sample Id Client	entification Lab Sample Number	Layer Percentage	Physical Description of Sample/Layer	Asbestos Detected	Asbestos Percentage	Non-Asbestos Fiber Percentage	Non-Fibrous Material Percentage	Matrix Material Composition	Homo-geneous (Y/N)	
CB1	23051485-1A	95	Tan Cove Base	ND			100	B,C	N	
CDI	23051485-1B	5	Brown Mastic	ND			100	T,B	Y	
CB2	23051485-2A	98	Tan Cove Base	ND			100	B,C	N	
	23051485-2B	2	Brown Mastic	ND			100	T,B	Y	
En	R. Thompson participy Analyst	-	Emily R. Thompson Emily Thompson Asbestos Lab Supervisor		AC = Actinolite AM = Amosite AN = Anthophy CHRY = Chryso CR = Crocidolitt TRM = Tremolit Tr = Trace	tile MW = Mineral OT = Other	ise C = ilass D = Wool G = M = ic OR	Calcite	Q = Quartz F = Tar V = Vermiculi	

ND = None Detected

W = Wollastonite

P = Perlite

Page 1 of 2



Aer	associates, <u>i</u> Laboratory		780 Simmis Street Suite 100 Golden, CO, 80401 303.232,3746
	A Pace Analytical® Laboratory	Certificate of Analysis	www.aerobiology.net
Client Name Street Address City, State ZIP Attn: Client Project Name:	ECOS Environmental 6690 HWY 82 Glenwood Springs, CO 81601 Tobie Taylor S-23-0029-AT / 38600 Main St., Milner, CO	NVLAD TESTING NVLAP Lab Code 200860-0	Date Collected: 12/12/2023 Date Received: 12/14/2023 Date Analyzed: 12/20/2023 Date Reported: 12/21/2023 Project ID: 23051485

Test Requested: 3002, Asbestos in Bulk Samples

Method:

EPA 600/R-93/116: Method for Asbestos in Bulk Building Materials, EPA ~ 40 CFR Appendix E to Subpart E of Part 763, Interim Method for Asbestos in Bulk Insulation Samples

General Notes

- ND indicates no asbestos was detected; the method detection limit is 1 %.
- Trace or "<1" indicates asbestos was identified in the sample, but the concentration is less than 1% and cannot be quantified without point counting.
- · Samples identified as inhomogeneous (more than one layer) are separated into individual layers, and each layer is analyzed and reported separately.

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All regulated asbestos minerals (i.e. chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite) were sought in every layer of each sample, but only those asbestos minerals detected are listed. Amosite is the common name for the asbestiform variety of the mineral grunerite. Crocidolite is the common name used for the asbestiform variety of the mineral rebeckite.

- Tile, vinyl, foam, plastic, and fine powder samples may contain asbestos fibers of such small diameter (< 0.25 microns in diameter) that these fibers cannot be detected by PLM. For such samples, more
 sensitive analytical methods (e.g. TEM, SEM, and XRD) are recommended if greater certainty about asbestos content is required. Semi-quantitative bulk TEM floor tile analysis is accepted under NESHAP
 regulations.
- These results are submitted pursuant to Aerobiology Laboratory Associates, Inc.'s current terms and conditions of sale, including the company's standard warranty and limitation of liability provisions. No
 responsibility or liability is assumed for the manner in which the results are used or interpreted.
- Unless notified in writing to return the samples covered by this report, Aerobiology Laboratory Associates, Inc. will store the samples for a minimum period of thirty (30) days before discarding. A shipping
 and handling charge will be assessed for the return of any samples.
- Aerobiology does not guarantee the results of tape lifts, microvacs, wipe, and/or debris samples. Accurate analysis cannot be performed due to particle size, media used, and/or amount of material given. Analysis of these materials should be performed by a TEM. A result of ND does not indicate that the sample area does not contain asbestos. It means the analyst could not identify asbestos in the specific sample for the reasons listed above.
- "When joint compound and/or tape is applied to a wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system." EPA 40 CFR Part 61 Aerobiology cannot distinguish joint compound from the same material used as skim coat. Therefore, it is very important that individuals collecting the samples clearly describe the sample composition so Aerobiology knows that the drywall system can be composited. If only joint sampling areas show layers with >1% asbestos, then material is joint compound. If samples from both joint sampling area and non-joint areas show layers with >1% asbestos, then the material should be considered "skim coat" or add-on material.

Notes Required by NVLAP

- . This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.
- · This test report relates only to the items tested or calibrated.
- This report is not valid unless it bears the name of a NVLAP-approved signatory.
- · Any reproduction of this document must include the entire document in order for the report to be valid.

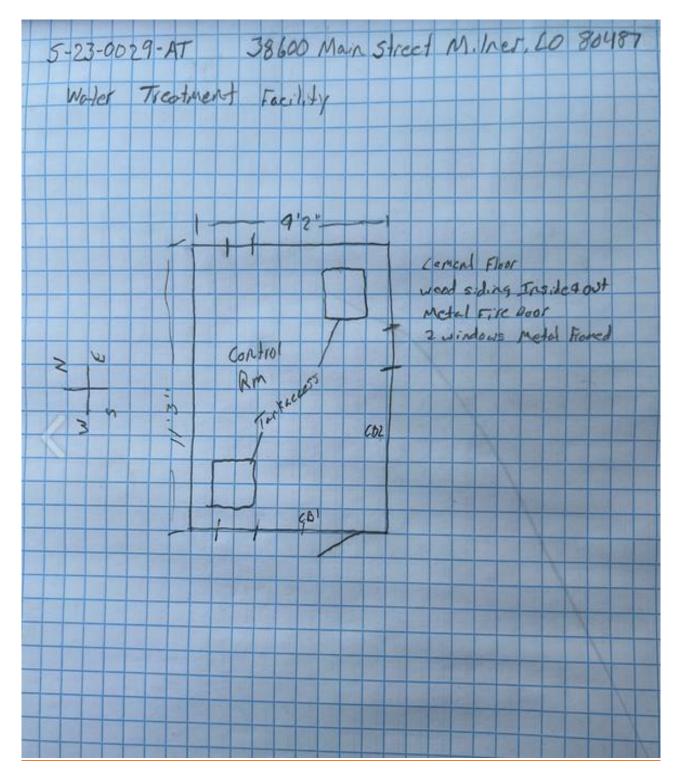


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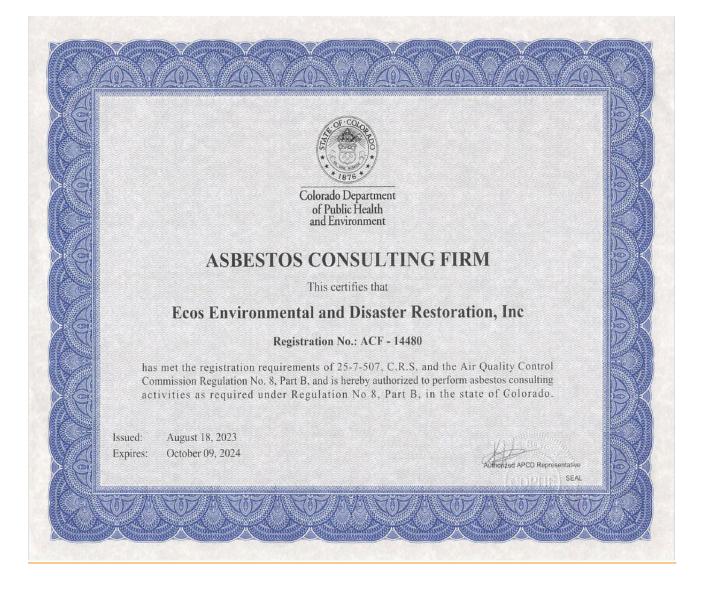




Environmental & Disaster Restoration, Inc.











Colorado Department of Public Health and Environment

ASBESTOS CERTIFICATION*

This certifies that

Tobie Taylor

Certification No.: 21893

has met the requirements of 25-7-507, C.R.S. and Air Quality Control Commission Regulation No. 8, Part B, and is hereby certified by the state of Colorado in the following discipline:

Building Inspector*

Issued:

October 13, 2023

Expires: November 10, 2024

* This certificate is valid only with the possession of a current Division-approved training course certification in the discipline specified above.

APCD Representative SEAL



This report represents the opinion of the Certified Asbestos Building Inspector at the time of the asbestos assessment survey. If you have any question, concerns, or if additional information is needed please do not hesitate to call.

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Sincerely,

Sof Myhr

Tobie Taylor, BI Colorado State EPA Asbestos Inspector #21893 ECOS Environmental & Disaster Restoration, Inc. (970) 945-4407