

AACTION ENVIRONMENTAL SERVICES INC.

June 27, 2011

Benchmark Environmental
Mr. John Deth
2558 Hamburg Turnpike, Suite 300
Lackawanna, NY 14218

**Project: BPA Pickle Buildings, 830 Brigham Road, Dunkirk, NY 14048
(Asbestos Bulk Sampling & Laboratory Testing)**

Dear Mr. Deth,

Please find enclosed the Chain of Custodies, Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM) laboratory results for the above referenced project. The asbestos sampling was performed to identify, sample and analyze suspect asbestos containing materials.

The asbestos bulk sampling was performed at the former Al Tech Steel Pickle Buildings, 830 Brigham Road, Dunkirk, NY 14048 on June 15, 2011 by Kevin Zielinski (NY DOL Inspector #99-21358) with protocols acknowledged in New York State following guidelines of Title NYCRR, Part 56 (NY State DOL Code Rule #56). Samples were analyzed by EMSL Analytical, Inc (NY State ELAP # 11606) using Polarized Light Microscopy (PLM) in compliance with NY State ELAP Method 198.1 and NY ELAP Method 198.6. Negative Non-Friable Organically Bound (NOB) PLM samples then required analysis under Transmission Electron Microscopy (TEM), as per NYS DOH ELAP Item #198.4 to determine (potential) asbestos content suspended in a non-friable organically bound (NOB) matrix.

The results of the above laboratory methods confirm or refute that a suspect sample actually contains asbestos. The U.S. EPA currently regulates asbestos containing material (ACM) as material containing 1% or greater asbestos content. Anything less than 1% is denoted as a trace concentration or NAD; No Asbestos Detected. Please note, some samples taken have tested positive for asbestos.

Please feel free to contact us if you have any questions or require additional environmental support services.

Sincerely,



Kevin Zielinski
President

CHAIN OF CUSTODY

141102450

SURVEY BULK SAMPLING OTHER
 ASBESTOS LEAD OTHER

ACTION ENVIRONMENTAL SERVICES INC.
 1790 CLINTON STREET • BUFFALO, NY 14206
 PHONE: (716) 818-1212 • FAX: (716) 677-8813

(Benchmark) BPA Pickle Bldg's Survey

CLIENT ADDRESS 830 Brigham Road
 PROJECT LOCATION Dunkirk, NY 14048.
 CLIENT PHONE/CELL _____

CLIENT FAX _____

COMMENTS _____

METHOD & TURN AROUND TIME

198.1 198.6 198.4 OTHER _____

72 HR 48 HR 24 HR RUSH 96HR

SAMPLE ID	TYPE OF MATERIAL	SAMPLING LOCATION	COLOR	MATERIAL SIZE	NOTES
1. CR-1	Core Roof	Lime Mixing Bld-Roof	Black		Bottom layer
2. CR-2	"	"	Brown		layer #2
3. CR-3	"	"	Black		layer #3
4. CR-4	"	"	Black		Top layer
5. CR-5B	Core Roof-B	Lime Mixing Bld-Roof	Black		Bottom layer-B
6. CR-6B	"	"	Brown		layer #2-B
7. CR-7B	"	"	Black		layer #3-B
8. CR-8B	"	"	Black		layer #4-B
9. LCR-9	Lower Core Roof	Pickle Bld, Lower Roof	Black		Bottom layer
10. LCR-10	"	"	Brown		layer #2

SAMPLED BY Kevin Zielinski DATE 06/15/11
 RECEIVED BY Kevin Zielinski DATE 06/15/11
 RECEIVED IN LAB BY 2:23 pm DATE _____

CHAIN OF CUSTODY

1411021820

SURVEY BULK SAMPLING OTHER
 ASBESTOS LEAD OTHER

ACTION ENVIRONMENTAL SERVICES INC.
 1790 CLINTON STREET • BUFFALO, NY 14206
 PHONE: (716) 818-1212 • FAX: (716) 677-8813

(Benchmark) BPA Pickle Bldg's Survey

CLIENT NAME 830 Bringham Road
 PROJECT NAME Dunkirk, NY 14048.
 CLIENT ADDRESS Dunkirk, NY 14048.
 PROJECT LOCATION

CLIENT PHONE/CELL _____
 COMMENTS _____

METHOD & TURN AROUND TIME

198.1 (circled) 198.6 (circled) 198.4 (circled) OTHER _____
 72 HR 48 HR 24 HR RUSH 96 HR (circled)

SAMPLE ID	TYPE OF MATERIAL	SAMPLING LOCATION	COLOR	MATERIAL SIZE	NOTES
1. LCR-11	Lower Core Roof	Pickle Bld lower front roof -	Black		layer # 3
2. LCR-12	"	"	Silver + Black		Top layer
3. LCR-13B	Lower Core Roof-B	Pickle Bld lower front-Roof-B	Black		Bottom layer
4. LCR-14B	"	"	Brown		layer # 2B
5. LCR-15B	"	"	Black		layer # 3B
6. LCR-16B	"	"	Silver + Black		Top layerB
7. PCR-17	Pickle Core Roof	Main Pickle Bld-Roof -	Black		Bottom layer
8. PCR-18	"	"	Black		Middle layer
9. PCR-19	"	"	Black		Top layer
10. PCR-20B	Pickle Core Roof-B	Main Pickle-Roof-B	Black		Bottom layer-B

SAMPLED BY Kevin Zielinski DATE 06/15/11 DATE SEALED / TRANSPORTED 06/15/11 - KZ
 RECEIVED BY [Signature] DATE 06/15/11 RECEIVED IN LAB BY _____ DATE _____

CHAIN OF CUSTODY

141102452

SURVEY BULK SAMPLING _____ OTHER _____
 ASBESTOS LEAD _____ OTHER _____

ACTION ENVIRONMENTAL SERVICES INC.
 1790 CLINTON STREET • BUFFALO, NY 14206
 PHONE: (716) 818-1212 • FAX: (716) 677-8813

(Benchmark) BPA Pickle Bldg's Survey
 CLIENT NAME PROJECT NAME
830 Brigham Road
 CLIENT ADDRESS PROJECT LOCATION
DUNKIRK, NY 14048.

CLIENT PHONE/CELL _____
 COMMENTS _____

METHOD & TURN AROUND TIME

198.1 198.6 198.4 OTHER _____
 72 HR 48 HR 24 HR RUSH 96 HR

SAMPLE ID	TYPE OF MATERIAL	SAMPLING LOCATION	DESCRIPTION	COLOR	MATERIAL SIZE	NOTES
1.	Pickle Core Roof-B	Main Pickle Bid - Roof B	layer	Black		
2.	" - "	" " - "	Top layer-B	Black		
3.	SC-23 Steel Sheet Covering	Pickle Bid - upper	Siding Covering	Black		
4.	SC-24B Steel Sheet Covering-B	" " - "	Roof Steel Covering-B	Black		
5.	RT-25 Roof Tar	" " - "	Upper Tar on Bid - Bricks	Black		
6.	RT-26B Roof Tar B	Lower Pickle Bid Roof	Surface Roof Tar (front)	Black		
7.	WC-27 Windows Caulk	Lime Mixing Bidg -	Exterior Caulk (Upper)	Gray		
8.	WC-28B Windows Caulk-B	" " - "	Exterior Basement Windows Caulk	Gray		
9.	WA-29 Windows Glaze	" " - "	Interior front Windows	Gray		
10.	WA-30B Windows Glaze-B	" " - "	Interior side Windows	Gray		

SAMPLED BY Kevin Zielinski DATE 06/15/11 DATE SEALED / TRANSPORTED 06/15/11 - KZ
 RECEIVED BY Rad no DATE 06/15/11 RECEIVED IN LAB BY 223 DATE _____

141102450

CHAIN OF CUSTODY

SURVEY BULK SAMPLING _____ OTHER _____
 ASBESTOS LEAD _____ OTHER _____

ACTION ENVIRONMENTAL SERVICES INC.
 1790 CLINTON STREET • BUFFALO, NY 14206
 PHONE: (716) 818-1212 • FAX: (716) 677-8813

(Benchmark) BPA Pickle Bldg's Survey

CLIENT ADDRESS 830 Bringham Road
Dunkirk, NY 14048.
 CLIENT PHONE/CELL _____
 PROJECT NAME _____
 PROJECT LOCATION _____

METHOD & TURN AROUND TIME

198.1 198.6 198.4 OTHER _____
 72 HR 48 HR 24 HR RUSH 96 HR

CLIENT FAX _____ COMMENTS _____

SAMPLE ID	TYPE OF MATERIAL	SAMPLING LOCATION	COLOR	MATERIAL SIZE	NOTES
1.	PI-31 Pipe Insulation	Lime Mixing Bldg - Fiber glass - Floor	White + yellow		Paper + 1st
2.	PI-32	" " " " "	" "		" - " "
3.	PI-33	" " " " "	" "		" - Basement
4.	PI-34 Pipe Insulation	Pickle Building - ACM Pipe Insulation - large pipe	gray		Back
5.	PI-35	" " " " "	" "		upper smaller pipe
6.	PI-36	" " " " "	" "		upper smaller pipe
7.					
8.					
9.					
10.					

SAMPLED BY Kevin Zielinski DATE 06/15/11 DATE SEALED / TRANSPORTED 06/15/11 - KZ
 RECEIVED BY J. Paul D. DATE 6/15/11 RECEIVED IN LAB BY A.S. 2:23 pm DATE _____



EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

Phone: (716) 651-0030 Fax: (716) 651-0394 Email: buffalolab@emsl.com

Attn: **Kevin Zielinski**
AAction Environmental Services, Inc.
1790 Clinton Street

Buffalo, NY 14206

Fax: Phone: (716) 818-1212
Project: **BPA Pickle Bldg's Survey**

Customer ID: **KZIE77**
Customer PO:
Received: **06/15/11 2:23 PM**
EMSL Order: **141102450**

EMSL Proj:
Analysis Date: **6/18/2011**

Test Report: Asbestos Analysis of Bulk Materials by PLM via the NY State ELAP 198.1 Method

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
CR-5B 141102450-0005	lime mixing bld - roof - bottom layer - b	Black Non-Fibrous Homogeneous		100.00% Non-fibrous (other)	None Detected
CR-6B 141102450-0006	lime mixing bld - roof - bottom layer #2 - b	Brown Fibrous Homogeneous	80.00% Cellulose	20.00% Non-fibrous (other)	None Detected
LCR-10 141102450-0010	pickle bld, lower front roof - layer #2	Brown Fibrous Heterogeneous	80.00% Cellulose	20.00% Non-fibrous (other)	None Detected
LCR-14B 141102450-0014	pickle bld lower front - roof - b - layer # 2b	Brown Fibrous Homogeneous	80.00% Cellulose	20.00% Non-fibrous (other)	None Detected
PI-31 141102450-0031	lime mixing bldg - paper fiberglass - 1st floor	Silver/Yellow Fibrous Heterogeneous	80.00% Min. Wool	20.00% Non-fibrous (other)	None Detected
PI-32 141102450-0032	lime mixing bldg - paper fiberglass - 1st floor	Silver/Yellow Fibrous Heterogeneous	80.00% Min. Wool	20.00% Non-fibrous (other)	None Detected
PI-33 141102450-0033	lime mixing bldg - paper fiberglass - 1st floor - -basement	Silver/Yellow Fibrous Homogeneous	80.00% Min. Wool	20.00% Non-fibrous (other)	None Detected
PI-34 141102450-0034	pickle building - acm pipe insulation - -back lower pipe	Brown Fibrous Homogeneous		20.00% Non-fibrous (other)	80.00% Chrysotile

Initial report from 06/20/2011 13:36:00

Analyst(s)
Taron Williams (10)

Rhonda McGee
Rhonda McGee, Laboratory Manager
or other approved signatory

PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Negative PLM results cannot be guaranteed. Samples reported as <1% or none detected should be tested with TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Unless otherwise noted, the results in this report have not been blank corrected. Samples received in good condition unless otherwise noted.
Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELAP 11606



EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

Phone: (716) 651-0030 Fax: (716) 651-0394 Email: buffalolab@emsl.com

Attn: **Kevin Zielinski**
AAction Environmental Services, Inc.
1790 Clinton Street

Buffalo, NY 14206

Fax: Phone: (716) 818-1212
Project: **BPA Pickle Bldg's Survey**

Customer ID: **KZIE77**
Customer PO:
Received: **06/15/11 2:23 PM**
EMSL Order: **141102450**

EMSL Proj:
Analysis Date: **6/18/2011**

Test Report: Asbestos Analysis of Bulk Materials by PLM via the NY State ELAP 198.1 Method

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
PI-35 141102450-0035	pickle building - acm pipe insulation - - upper smaller pipe	Brown Fibrous Homogeneous		20.00% Non-fibrous (other)	80.00% Chrysotile
PI-36 141102450-0036	pickle building - acm pipe insulation - - upper smaller pipe	Brown Fibrous Homogeneous		20.00% Non-fibrous (other)	80.00% Chrysotile

Initial report from 06/20/2011 13:36:00

Analyst(s)

Taron Williams (10)

Rhonda McGee, Laboratory Manager
or other approved signatory

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Buffalo, NY 14206

Fax: Phone: (716) 818-1212
Project: BPA Pickle Bldg's Survey

Customer ID: KZIE77
Customer PO:
Received: 06/15/11 2:23 PM
EMSL Order: 141102450

EMSL Proj:
Analysis Date: 6/19/2011

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by PLM via the NY State ELAP 198.6 Method

Table with 6 columns: SAMPLE ID, DESCRIPTION, APPEARANCE, % MATRIX MATERIAL, % NON-ASBESTOS FIBERS, ASBESTOS TYPES. Rows include CR-1 through LCR-12 with various descriptions like 'core roof' and 'lower core roof'.

Initial report from 06/19/2011 11:28:01

Analyst(s)
Rachel Glese (26)

Rhonda McGee (handwritten signature)

Rhonda McGee, Laboratory Manager or other approved signatory

*Polarized Light Microscopy (PLM) is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELAP 11606



EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

Phone: (716) 651-0030 Fax: (716) 651-0394 Email: buffalo@emsl.com

Attn: Kevin Zielinski
AAction Environmental Services, Inc.
1790 Clinton Street
Buffalo, NY 14206

Customer ID: KZIE77
Customer PO:
Received: 06/15/11 2:23 PM
EMSL Order: 141102450

Fax:
Project: BPA Pickle Bldg's Survey
Phone: (716) 818-1212

EMSL Proj:
Analysis Date: 6/19/2011

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by PLM via the NY State ELAP 198.6 Method

Table with 6 columns: SAMPLE ID, DESCRIPTION, APPEARANCE, % MATRIX MATERIAL, % NON-ASBESTOS FIBERS, ASBESTOS TYPES. Rows include LCR-13B, LCR-15B, LCR-16B, PCR-17, PCR-18, PCR-19, PCR-20B, PCR-21B, PCR-22B.

Initial report from 06/19/2011 11:28:01

Analyst(s)

Rachel Giese (26)

Rhonda McGee (Signature)

Rhonda McGee, Laboratory Manager or other approved signatory

*Polarized Light Microscopy (PLM) is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. Quantitative Transmission Electron Microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELAP 11608



EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

Phone: (716) 651-0030 Fax: (716) 651-0394 Email: buffalo@emsl.com

Attn: Kevin Zielinski
AAAction Environmental Services, Inc.
1790 Clinton Street
Buffalo, NY 14206

Customer ID: KZIE77
Customer PO:
Received: 06/15/11 2:23 PM
EMSL Order: 141102450

Fax:
Project: BPA Pickle Bldg's Survey
Phone: (716) 818-1212

EMSL Proj:
Analysis Date: 6/19/2011

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by PLM via the NY State ELAP 198.6 Method

Table with 6 columns: SAMPLE ID, DESCRIPTION, APPEARANCE, % MATRIX MATERIAL, % NON-ASBESTOS FIBERS, ASBESTOS TYPES. Rows include samples SC-23, SC-24B, RT-25, RT-26B, WC-27, WC-28B, WA-29, and WA-30B.

Initial report from 06/19/2011 11:28:01

Analyst(s)

Rachel Glese (26)

Rhonda McGee (signature)

Rhonda McGee, Laboratory Manager or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELAP 11606



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AAction Environmental Services, Inc.
1790 Clinton Street

Buffalo, NY 14206

Fax: _____
Project: **BPA Pickle Bldg's Survey**

Phone: (716) 818-1212

Customer ID: KZIE77
Customer PO: _____
Received: 06/15/11 2:23 PM
EMSL Order: 141102450

EMSL Proj: _____
Analysis Date: 6/20/2011

**Test Report: Asbestos Analysis of Non-Friable Organically Bound materials by
Transmission Electron Microscopy via NYS ELAP Method 198.4**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES	% TOTAL ASBESTOS
CR-1 141102450-0001	core roof	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	
CR-2 141102450-0002	core roof	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	
CR-3 141102450-0003	core roof	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	
CR-4 141102450-0004	core roof					
Not Analyzed						
CR-7B 141102450-0007	core roof - b	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	
CR-8B 141102450-0008	core roof - b	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	
LCR-9 141102450-0009	lower core roof	Brown /Black Fibrous Heterogeneous	100.0	None	No Asbestos Detected	
LCR-11 141102450-0011	lower core roof	Black Fibrous Homogeneous	100.0	None	No Asbestos Detected	

Initial report from 06/20/2011 14:22:31

Analyst(s)

Tom Hanes (14)

Rhonda McGee, Laboratory Manager
or other approved signatory

This laboratory is not responsible for % asbestos in total sample when the residue only is submitted for analysis. The above report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. Samples received in good condition unless otherwise noted.
Samples analyzed by EMSL Analytical, Inc. Depew, NY NYS ELAP 11606



EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

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1790 Clinton Street

Buffalo, NY 14206

Fax: Phone: (716) 818-1212
Project: **BPA Pickle Bldg's Survey**

Customer ID: **KZIE77**
Customer PO:
Received: **06/15/11 2:23 PM**
EMSL Order: **141102450**

EMSL Proj:
Analysis Date: **6/20/2011**

**Test Report: Asbestos Analysis of Non-Friable Organically Bound materials by
Transmission Electron Microscopy via NYS ELAP Method 198.4**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES	% TOTAL ASBESTOS
LCR-12 141102450-0012	lower core roof					
Not Analyzed						
LCR-13B 141102450-0013	lower core roof - b	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected
LCR-15B 141102450-0015	lower core roof - b	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected
LCR-16B 141102450-0016	lower core roof - b					
Not Analyzed						
PCR-17 141102450-0017	pickle core roof					
Not Analyzed						
PCR-18 141102450-0018	pickle core roof	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected
PCR-19 141102450-0019	pickle core roof	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected

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Analyst(s)

Tom Hanes (14)

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Project: **BPA Pickle Bldg's Survey**

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Customer PO:
Received: **06/15/11 2:23 PM**
EMSL Order: **141102450**

EMSL Proj:
Analysis Date: **6/20/2011**

**Test Report: Asbestos Analysis of Non-Friable Organically Bound materials by
Transmission Electron Microscopy via NYS ELAP Method 198.4**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES	% TOTAL ASBESTOS
PCR-20B 141102450-0020	pickle core roof - b					
Not Analyzed						
PCR-21B 141102450-0021	pickle core roof - b	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected
PCR-22B 141102450-0022	pickle core roof - b	Black Fibrous Homogeneous	100.0	None		No Asbestos Detected
SC-23 141102450-0023	steel sheet covering					
Not Analyzed						
SC-24B 141102450-0024	steel sheet covering - b	Black /Silver Fibrous Heterogeneous	100.0	None		No Asbestos Detected
RT-25 141102450-0025	roof tar					
Not Analyzed						
RT-26B 141102450-0026	roof tar b					
Not Analyzed						

Initial report from 06/20/2011 14:22:31

Analyst(s)

Tom Hanes (14)

Rhonda McGee, Laboratory Manager
or other approved signatory

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 490 Rowley Road, Depew, NY 14043

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Attn: **Kevin Zielinski**
AAction Environmental Services, Inc.
1790 Clinton Street

Buffalo, NY 14206

Customer ID: KZIE77
 Customer PO:
 Received: 06/15/11 2:23 PM
 EMSL Order: 141102450

Fax:
 Project: **BPA Pickle Bldg's Survey**

Phone: (716) 818-1212
 EMSL Proj:
 Analysis Date: 6/20/2011

**Test Report: Asbestos Analysis of Non-Friable Organically Bound materials by
 Transmission Electron Microscopy via NYS ELAP Method 198.4**

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES	% TOTAL ASBESTOS
WC-27 141102450-0027	window caulk					
Not Analyzed						
WC-28B 141102450-0028	window caulk - b					
Not Analyzed						
WG-29 141102450-0029	window glaze					
Not Analyzed						
WG-30B 141102450-0030	window glaze - b					
Not Analyzed						

Initial report from 06/20/2011 14:22:31

Analyst(s)
 Tom Hanes (14)

Rhonda McGee
 Rhonda McGee, Laboratory Manager
 or other approved signatory

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