



November 13, 2025

Mr. Jordan Hodges  
Village Administrator  
Village of Covington  
1 South High Street  
Covington, Ohio 45318

**Re: Pre-Demolition Asbestos Inspection**  
**21 West Wright Street**  
**Covington, Ohio 45318**  
**MAKSolve Project Number: 182-25**

Dear Mr. Hodges:

On November 10, 2025, Mr. Chuck Callahan and Mr. Chris Fath (Ohio Environmental Protection Agency Certified Asbestos Hazard Evaluation Specialists #ES31960, #ES534923 respectively of MAKsolve visited the building located at 21 West Wright Street in Covington, Ohio. The purpose of this visit was to conduct an asbestos inspection of the specified building in preparation for demolition. The inspections were performed as required by Section 61.145 (a) of November 20, 1990, National Emission Standards for Hazardous Air Pollutants (NESHAP); Asbestos NESHAP Revision, Final Rule issued by the Environmental Protection Agency and portions of the Asbestos Hazard Emergency Response Act (AHERA) regulations. This process includes a visual inspection of the accessible areas, as well as the collection and analysis of accessible materials suspect for containing asbestos.

During the survey, samples were collected utilizing sampling methods outlined in current EPA Guidance Documents and U.S. EPA regulation 40 CFR Part 763.86. Each sample was collected and placed in a clean, sealable container and labeled with a unique sample identification number. Pertinent information was recorded on a Bulk Sample Log Sheet, including sample identification number, date of inspection, name of inspector, building name, a brief description and location of the sample, and the type of material sampled (e.g., thermal insulation, fireproofing, acoustical plaster). The samples were submitted to the analytical laboratory and analyzed for asbestos content by polarized-light microscopy (PLM) and dispersion staining (Method Reference: 40 CFR Part 763, Volume 47, No. 103, May 27, 1982, pg. 23376). This analytical method, which the EPA currently recommends for the determination of asbestos in

Environmental & Safety Consultants

bulk samples of suspect materials, can be used for qualitative identification of six morphologically different types of asbestos fibers: chrysotile, amosite, crocidolite, anthophyllite, tremolite, and actinolite asbestos.

The method specifies that the asbestos content in a bulk sample shall be estimated and reported as a finite percentage (rounded to the nearest percentage) within the range of 0 to 100. EPA defines asbestos-containing material as containing at least 1% asbestos. The results of the bulk sample analyses are reported in a standard written laboratory report. This report includes the client's name, the project number, the laboratory identification number, the sample number assigned to the bulk sample upon receipt at the laboratory, and the field number assigned to the bulk sample upon collection on site. If the bulk sample contains more than one distinct layer of material, then each layer is analyzed separately. The composition of the bulk sample is reported in percentages of asbestos (i.e., chrysotile, amosite, or other) and non-asbestos (i.e., cellulose, fiberglass, or other) components. The results of the sample analysis can be found in the laboratory report enclosed and Table 1.

MAKSolve collected samples from ceiling tiles, window caulk, window glaze, duct insulation, drywall, joint compound, baseboards, linoleum and door caulk. MAKSolve identified seven (7) asbestos-containing materials (>1%) and assumed two (2) materials to be asbestos-containing materials within the structure scheduled for demolition. Locations, types and other information related to the asbestos-containing materials (ACM) are summarized in Table 2 of this report. The cost estimate to remove the RACM, Category I nonfriable that may become friable and Category II asbestos-containing materials from this site prior to demolition would be **\$35,500.00**.

MAKSolve identified four (4) asbestos materials containing <1% asbestos. The Occupational Safety and Health Administration (OSHA) regulates building materials that contain <1% asbestos. The disturbance or removal of <1% asbestos materials must be performed by wet methods, prompt clean-up and disposal of materials as asbestos-containing in leak-proof containers and perform exposure assessment of personnel performing work activities. Work involving these materials should follow OSHA regulations.

Prior to demolition activities, there are other environmental related items that should be addressed such as fluorescent light tubes, suspect PCB light ballasts, CFL bulbs, NiCad batteries, mercury thermostats, paints/chemicals and chlorofluorocarbons (CFC's). Quantities of these items can be found in Table 3 of this report. The cost estimate to remove the hazardous material from this site prior to demolition would be **\$6,000.00**.

MAKSolve made every effort to locate suspect asbestos-containing materials (ACM) that may be concealed; however, suspect asbestos-containing materials which may be located behind hard walled chases, under flooring, carpet, sub-flooring, behind building contents, behind walls

and ceilings, unsafe building conditions, untested areas, etc., were not assessed. If through demolition suspect materials are discovered; they should be documented and handled accordingly.

**This report is prepared to assist the Village of Covington, construction managers and asbestos abatement contractors in locating asbestos-containing materials.** This report is not intended as a bidding document or project specifications.

Enclosed are the following MAKsolve documents:

- Table 1-Bulk Sample Data Summary
- Table 2-Asbestos Inventory
- Table 3-Environmental Inventory
- Attachments:
  - Laboratory Reports
  - Inspector's Certification

If we can be of further assistance on this or any other project, do not hesitate to call us at (937) 815-6949.

Sincerely,

**MAKSOLVE**



Chuck Callahan  
Project Manager, ES31960

Attachments

**TABLE 1: BULK SAMPLE DATA SUMMARY**

| <b>SAMPLE DESCRIPTION<br/>(Material Type)</b>                                                                      | <b>SAMPLE LOCATION</b>             | <b>HOMO AREA #</b> | <b>SAMPLE I.D. NO.</b> | <b>ASBESTOS CONTENT</b> | <b>FRIABLE/<br/>NONFRIABLE</b> |
|--------------------------------------------------------------------------------------------------------------------|------------------------------------|--------------------|------------------------|-------------------------|--------------------------------|
| <b>The following samples were collected from the building located at 21 West Wright Street in Covington, Ohio.</b> |                                    |                    |                        |                         |                                |
| 12" Ceiling tile with tracks<br>(Miscellaneous)                                                                    | 2nd Floor, breezeway,<br>Wall A    | 1                  | 1-1                    | None Detected           | Friable                        |
| 12" Ceiling tile with tracks<br>(Miscellaneous)                                                                    | 2nd Floor, breezeway,<br>Wall C    | 1                  | 1-2                    | None Detected           | Friable                        |
| Window caulk<br>(Miscellaneous)                                                                                    | 2nd Floor, breezeway,<br>Wall B    | 2                  | 2-1                    | *1.50% Chrysotile       | Friable                        |
| Window caulk<br>(Miscellaneous)                                                                                    | 2nd Floor, breezeway,<br>Wall D    | 2                  | 2-2                    | Stopped Analysis        | Friable                        |
| Window glaze<br>(Miscellaneous)                                                                                    | 2nd Floor, breezeway,<br>Wall B    | 3                  | 3-1                    | *1.25% Chrysotile       | Friable                        |
| Window glaze<br>(Miscellaneous)                                                                                    | 2nd Floor, breezeway,<br>Wall D    | 3                  | 3-2                    | Stopped Analysis        | Friable                        |
| 15" x 20" Ceiling tile<br>(Miscellaneous)                                                                          | 2nd Floor, open<br>room            | 4                  | 4-1                    | None Detected           | Friable                        |
| 15" x 20" Ceiling tile<br>(Miscellaneous)                                                                          | 2nd Floor, open<br>room            | 4                  | 4-2                    | None Detected           | Friable                        |
| Aircell-duct<br>(Thermal System Insulation)                                                                        | 2nd Floor, open<br>room            | 5                  | 5-1                    | 60% Chrysotile          | Friable                        |
| Aircell-duct<br>(Thermal System Insulation)                                                                        | 1st Floor, open<br>room            | 5                  | 5-2                    | Stopped Analysis        | Friable                        |
| Aircell-duct<br>(Thermal System Insulation)                                                                        | 1st Floor, open<br>room            | 5                  | 5-3                    | Stopped Analysis        | Friable                        |
| Drywall<br>(Miscellaneous)                                                                                         | 2nd Floor, open<br>room, on column | 6                  | 6-1                    | None Detected           | Friable                        |
| Drywall<br>(Miscellaneous)                                                                                         | 2nd Floor, open<br>room ceiling    | 6                  | 6-2                    | None Detected           | Friable                        |
| Joint compound<br>(Miscellaneous)                                                                                  | 2nd Floor, open<br>room, on column | 7                  | 7-1                    | *0.75% Chrysotile       | Friable                        |
| Joint compound<br>(Miscellaneous)                                                                                  | 2nd Floor, open<br>room ceiling    | 7                  | 7-2                    | *0.50% Chrysotile       | Friable                        |
| Window caulk<br>(Miscellaneous)                                                                                    | 1st Floor, open<br>room, Wall C    | 8                  | 8-1                    | *2.25% Chrysotile       | Friable                        |
| Window caulk<br>(Miscellaneous)                                                                                    | 1st Floor, open<br>room, Wall D    | 8                  | 8-2                    | Stopped Analysis        | Friable                        |

Table 1-1

**TABLE 1: BULK SAMPLE DATA SUMMARY**

| <b>SAMPLE DESCRIPTION<br/>(Material Type)</b>                                 | <b>SAMPLE LOCATION</b>                 | <b>HOMO AREA #</b> | <b>SAMPLE I.D. NO.</b> | <b>ASBESTOS CONTENT</b> | <b>FRIABLE/<br/>NONFRIABLE</b> |
|-------------------------------------------------------------------------------|----------------------------------------|--------------------|------------------------|-------------------------|--------------------------------|
| Drywall<br>(Miscellaneous)                                                    | 1st Floor, open room, on column        | 9                  | 9-1                    | None Detected           | Friable                        |
| Drywall<br>(Miscellaneous)                                                    | 1st Floor, open room, restroom         | 9                  | 9-2                    | None Detected           | Friable                        |
| Joint compound<br>(Miscellaneous)                                             | 1st Floor, open room, on column        | 10                 | 10-1                   | *0.75% Chrysotile       | Friable                        |
| Joint compound<br>(Miscellaneous)                                             | 1st Floor, open room, restroom         | 10                 | 10-2                   | *0.50% Chrysotile       | Friable                        |
| 2'x4' Suspended ceiling tile with large and circular holes<br>(Miscellaneous) | 1st Floor, open room, men's restroom   | 11                 | 11-1                   | None Detected           | Friable                        |
| 2'x4' Suspended ceiling tile with large and circular holes<br>(Miscellaneous) | 1st Floor, open room, women's restroom | 11                 | 11-2                   | None Detected           | Friable                        |
| Tan baseboard<br>(Miscellaneous)                                              | 1st Floor, open room, men's restroom   | 12                 | 12-1                   | None Detected           | Nonfriable                     |
| Tan baseboard<br>(Miscellaneous)                                              | 1st Floor, open room, women's restroom | 12                 | 12-2                   | None Detected           | Nonfriable                     |
| Mastic associated with tan baseboard<br>(Miscellaneous)                       | 1st Floor, open room, men's restroom   | 13                 | 13-1                   | None Detected           | Nonfriable                     |
| Mastic associated with tan baseboard<br>(Miscellaneous)                       | 1st Floor, open room, women's restroom | 13                 | 13-2                   | None Detected           | Nonfriable                     |
| Grey blocked linoleum<br>(Miscellaneous)                                      | 1st Floor, open room, men's restroom   | 14                 | 14-1                   | 20% Chrysotile          | Nonfriable                     |
| Grey blocked linoleum<br>(Miscellaneous)                                      | 1st Floor, open room, men's restroom   | 14                 | 14-2                   | Stopped Analysis        | Nonfriable                     |
| Grey linoleum<br>(Miscellaneous)                                              | 1st Floor, open room, hallway          | 15                 | 15-1                   | None Detected           | Nonfriable                     |
| Grey linoleum<br>(Miscellaneous)                                              | 1st Floor, open room, hallway          | 15                 | 15-2                   | None Detected           | Nonfriable                     |
| 15" White ceiling tile<br>(Miscellaneous)                                     | 1st Floor, open room, hallway          | 16                 | 16-1                   | None Detected           | Friable                        |
| 15" White ceiling tile<br>(Miscellaneous)                                     | 1st Floor, open room, hallway          | 16                 | 16-2                   | None Detected           | Friable                        |
| Drywall<br>(Miscellaneous)                                                    | 1st Floor, open room, Wall D           | 17                 | 17-1                   | None Detected           | Friable                        |

Table 1-2

**TABLE 1: BULK SAMPLE DATA SUMMARY**

| <b>SAMPLE DESCRIPTION<br/>(Material Type)</b>                              | <b>SAMPLE LOCATION</b>                     | <b>HOMO AREA #</b> | <b>SAMPLE I.D. NO.</b> | <b>ASBESTOS CONTENT</b> | <b>FRIABLE/<br/>NONFRIABLE</b> |
|----------------------------------------------------------------------------|--------------------------------------------|--------------------|------------------------|-------------------------|--------------------------------|
| Drywall<br>(Miscellaneous)                                                 | 1st Floor, open room,<br>ceiling bulkhead  | 17                 | 17-2                   | None Detected           | Friable                        |
| Joint compound<br>(Miscellaneous)                                          | 1st Floor, open<br>room, Wall D            | 18                 | 18-1                   | *0.75% Chrysotile       | Friable                        |
| Joint compound<br>(Miscellaneous)                                          | 1st Floor, open room,<br>ceiling bulkhead  | 18                 | 18-2                   | *0.50% Chrysotile       | Friable                        |
| 2'x4' Suspended ceiling tile<br>rough with holes<br>(Miscellaneous)        | 1st Floor, open room,<br>Wall A            | 19                 | 19-1                   | *1.75% Chrysotile       | Friable                        |
| 2'x4' Suspended ceiling tile<br>rough with holes<br>(Miscellaneous)        | 1st Floor, open room,<br>middle of ceiling | 19                 | 19-2                   | Stopped Analysis        | Friable                        |
| 2'x4' Suspended ceiling tile<br>with holes and fissures<br>(Miscellaneous) | 1st Floor, open room,<br>Wall D            | 20                 | 20-1                   | None Detected           | Friable                        |
| 2'x4' Suspended ceiling tile<br>with holes and fissures<br>(Miscellaneous) | 1st Floor, open room,<br>Wall D            | 20                 | 20-2                   | None Detected           | Friable                        |
| Duct insulation<br>(Thermal system Insulation)                             | 1st Floor, open room,<br>HVAC              | 21                 | 21-1                   | 60% Chrysotile          | Friable                        |
| Duct insulation<br>(Thermal system Insulation)                             | 1st Floor, open room,<br>HVAC              | 21                 | 21-2                   | Stopped Analysis        | Friable                        |
| Duct insulation<br>(Thermal system Insulation)                             | 1st Floor, open room,<br>HVAC              | 21                 | 21-3                   | Stopped Analysis        | Friable                        |
| Drywall<br>(Miscellaneous)                                                 | Basement, middle<br>of ceiling             | 22                 | 22-1                   | None Detected           | Friable                        |
| Drywall<br>(Miscellaneous)                                                 | Basement, Wall C                           | 22                 | 22-2                   | None Detected           | Friable                        |
| Joint compound<br>(Miscellaneous)                                          | Basement, middle<br>of ceiling             | 23                 | 23-1                   | *0.75% Chrysotile       | Friable                        |
| Joint compound<br>(Miscellaneous)                                          | Basement, Wall C                           | 23                 | 23-2                   | *0.50% Chrysotile       | Friable                        |
| Exterior door caulk<br>(Miscellaneous)                                     | Exterior, Wall A                           | 24                 | 24-1                   | None Detected           | Friable                        |

**TABLE 1: BULK SAMPLE DATA SUMMARY**

| <b>SAMPLE<br/>DESCRIPTION<br/>(Material Type)</b> | <b>SAMPLE<br/>LOCATION</b> | <b>HOMO AREA<br/>#</b> | <b>SAMPLE<br/>I.D. NO.</b> | <b>ASBESTOS<br/>CONTENT</b> | <b>FRIABLE/<br/>NONFRIABLE</b> |
|---------------------------------------------------|----------------------------|------------------------|----------------------------|-----------------------------|--------------------------------|
| Exterior door caulk<br>(Miscellaneous)            | Exterior, Wall C           | 24                     | 24-2                       | None Detected               | Friable                        |

\*Quantified By PLM Point Count Method

**TABLE 2 - ASBESTOS INVENTORY**

| Location                                                                                                                          | Type<br>ACM | Material<br>Description                          | Amt. of<br>Material<br>(approx.) |
|-----------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------------------------------------|----------------------------------|
| <b>The following asbestos-containing materials are located in the building located at 21 West Wright Street, Covington, Ohio.</b> |             |                                                  |                                  |
| Entire Building                                                                                                                   | RACM        | Window caulk                                     | 8 windows (4 sf)                 |
| Entire Building                                                                                                                   | RACM        | Window glaze                                     | 8 windows (8 sf)                 |
| 1st Floor, north open room,<br>above middle soffit                                                                                | RACM        | Aircell duct insulation                          | 320 sf                           |
| 1st Floor, above middle soffit<br>and mechanical room                                                                             | RACM        | Duct tape insulation                             | 50 sf                            |
| Men's restroom                                                                                                                    | I (MBF)     | Grey blocked linoleum                            | 42 sf                            |
| 1st Floor, north open room                                                                                                        | RACM        | 2'x4' Suspended ceiling tile<br>rough with holes | 3,081 sf                         |
| Entire Building                                                                                                                   | I, Good     | *Flooring materials                              | 16,912 sf                        |
| Entire Building                                                                                                                   | I, Good     | *Roofing materials                               | 8,256 sf                         |

\*Assumed asbestos-containing material, good condition  
MBF - May Become Friable

**TABLE 3 - ENVIRONMENTAL INVENTORY**

| Location                                                                                                                           | Material Description       | Amt. of Material (approx.) |
|------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------|
| <b>The following hazardous materials should be removed prior to demolition of the specified building at 21 West Wright Street.</b> |                            |                            |
| Entire Building                                                                                                                    | Fluorescent light tubes    | 40 tubes                   |
| Entire Building                                                                                                                    | Suspect PCB light ballasts | 20 ballasts                |
| Entire Building                                                                                                                    | NiCad batteries            | 10 batteries               |
| Entire Building                                                                                                                    | Mercury thermostats        | 3 thermostats              |
| Entire Building                                                                                                                    | CFL bulbs                  | 80 bulbs                   |
| Entire Building                                                                                                                    | Various paints/chemicals   | 60 gallons                 |
| Entire Building                                                                                                                    | Refrigerators              | 2 refrigerators            |

**ATTACHMENTS:**  
**LABORATORY ANALYTICAL REPORT**  
**&**  
**INSPECTOR'S CERTIFICATIONS**



7469 Whitepine Rd  
North Chesterfield, VA 23237  
Telephone: 800.347.4010

## Asbestos Bulk Analysis Report

**Report Number:** 25-11-01776

**Client:** Sierra Environment Group Inc.  
1041 Straight Street  
Cincinnati, OH 45214

**Received Date:** 11/11/2025  
**Analyzed Date:** 11/11/2025, 11/12/2025  
**Reported Date:** 11/12/2025

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington, OH

**Client Number:**  
36-6195

**Fax Number:**  
513-542-6653

### Laboratory Results

| Lab Sample Number  | Client Sample Number | Layer Type | Lab Gross Description                     | Asbestos                        | Other Materials                 |
|--------------------|----------------------|------------|-------------------------------------------|---------------------------------|---------------------------------|
| 25-11-01776-001    | 1-1                  |            | White Paint; Brown Fibrous; Inhomogeneous | NAD                             | 94% Cellulose<br>6% Non-Fibrous |
| 25-11-01776-002    | 1-2                  |            | White Paint; Brown Fibrous; Inhomogeneous | NAD                             | 94% Cellulose<br>6% Non-Fibrous |
| 25-11-01776-003    | 2-1                  |            | Gray Brittle; Homogeneous                 | 3% Chrysotile                   | 97% Non-Fibrous                 |
| Total Asbestos: 3% |                      |            |                                           |                                 |                                 |
| 25-11-01776-004    | 2-2                  |            |                                           | Did Not Analyze (Positive Stop) |                                 |
| 25-11-01776-005    | 3-1                  |            | Gray Brittle; Homogeneous                 | 2% Chrysotile                   | 98% Non-Fibrous                 |
| Total Asbestos: 2% |                      |            |                                           |                                 |                                 |
| 25-11-01776-006    | 3-2                  |            |                                           | Did Not Analyze (Positive Stop) |                                 |

# Environmental Hazards Services, L.L.C

**Client Number:** 36-6195

**Report Number:** 25-11-01776

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington,  
OH

| Lab Sample Number          | Client Sample Number | Layer Type | Lab Gross Description                     | Asbestos                        | Other Materials                  |
|----------------------------|----------------------|------------|-------------------------------------------|---------------------------------|----------------------------------|
| 25-11-01776-007            | 4-1                  |            | White Paint; Brown Fibrous; Inhomogeneous | NAD                             | 96% Cellulose<br>4% Non-Fibrous  |
| 25-11-01776-008            | 4-2                  |            | White Paint; Brown Fibrous; Inhomogeneous | NAD                             | 96% Cellulose<br>4% Non-Fibrous  |
| 25-11-01776-009            | 5-1                  |            | Gray Fibrous; Homogeneous                 | 60% Chrysotile                  | 25% Cellulose<br>15% Non-Fibrous |
| <b>Total Asbestos: 60%</b> |                      |            |                                           |                                 |                                  |
| 25-11-01776-010            | 5-2                  |            |                                           | Did Not Analyze (Positive Stop) |                                  |
| 25-11-01776-011            | 5-3                  |            |                                           | Did Not Analyze (Positive Stop) |                                  |
| 25-11-01776-012            | 6-1                  |            | Gray Powdery; Homogeneous                 | NAD                             | 8% Cellulose<br>92% Non-Fibrous  |
| 25-11-01776-013            | 6-2                  |            | Gray Powdery; Homogeneous                 | NAD                             | 32% Cellulose<br>68% Non-Fibrous |
| 25-11-01776-014            | 7-1                  |            | Tan Granular; Homogeneous                 | 2% Chrysotile                   | 98% Non-Fibrous                  |
| <b>Total Asbestos: 2%</b>  |                      |            |                                           |                                 |                                  |
| 25-11-01776-015            | 7-2                  |            |                                           | Did Not Analyze (Positive Stop) |                                  |

# Environmental Hazards Services, L.L.C

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| Lab Sample Number         | Client Sample Number | Layer Type | Lab Gross Description                        | Asbestos                        | Other Materials                  |
|---------------------------|----------------------|------------|----------------------------------------------|---------------------------------|----------------------------------|
| 25-11-01776-016           | 8-1                  |            | Tan Brittle; Homogeneous                     | 4% Chrysotile                   | 96% Non-Fibrous                  |
| <b>Total Asbestos: 4%</b> |                      |            |                                              |                                 |                                  |
| 25-11-01776-017           | 8-2                  |            |                                              | Did Not Analyze (Positive Stop) |                                  |
| 25-11-01776-018           | 9-1                  |            | Gray Powdery;<br>Homogeneous                 | NAD                             | 16% Cellulose<br>84% Non-Fibrous |
| 25-11-01776-019           | 9-2                  |            | Gray Powdery;<br>Homogeneous                 | NAD                             | 16% Cellulose<br>84% Non-Fibrous |
| 25-11-01776-020           | 10-1                 |            | Tan Granular;<br>Homogeneous                 | 2% Chrysotile                   | 98% Non-Fibrous                  |
| <b>Total Asbestos: 2%</b> |                      |            |                                              |                                 |                                  |
| 25-11-01776-021           | 10-2                 |            |                                              | Did Not Analyze (Positive Stop) |                                  |
| 25-11-01776-022           | 11-1                 |            | White Paint; Brown<br>Fibrous; Inhomogeneous | NAD                             | 96% Cellulose<br>4% Non-Fibrous  |
| 25-11-01776-023           | 11-2                 |            | White Paint; Brown<br>Fibrous; Inhomogeneous | NAD                             | 96% Cellulose<br>4% Non-Fibrous  |
| 25-11-01776-024           | 12-1                 |            | Green Vinyl;<br>Homogeneous                  | NAD                             | 100% Non-Fibrous                 |

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| Lab Sample Number                      | Client Sample Number | Layer Type | Lab Gross Description                            | Asbestos                        | Other Materials                                   |
|----------------------------------------|----------------------|------------|--------------------------------------------------|---------------------------------|---------------------------------------------------|
| 25-11-01776-025                        | 12-2                 |            | Green Vinyl;<br>Homogeneous                      | NAD                             | 100% Non-Fibrous                                  |
| 25-11-01776-026                        | 13-1                 |            | Yellow Adhesive;<br>Homogeneous                  | NAD                             | 100% Non-Fibrous                                  |
| 25-11-01776-027                        | 13-2                 |            | Yellow Adhesive;<br>Homogeneous                  | NAD                             | 100% Non-Fibrous                                  |
| 25-11-01776-028                        | 14-1                 |            | Tan Vinyl; Gray Fibrous;<br>Inhomogeneous        | 20% Chrysotile                  | 15% Cellulose<br>65% Non-Fibrous                  |
| <b>Total Asbestos: 20%</b>             |                      |            |                                                  |                                 |                                                   |
| Chrysotile present in fibrous backing. |                      |            |                                                  |                                 |                                                   |
| 25-11-01776-029                        | 14-2                 |            |                                                  | Did Not Analyze (Positive Stop) |                                                   |
| 25-11-01776-030                        | 15-1                 |            | White/Gray Vinyl; Gray<br>Fibrous; Inhomogeneous | NAD                             | 25% Cellulose<br>12% Synthetic<br>63% Non-Fibrous |
| 25-11-01776-031                        | 15-2                 |            | White/Gray Vinyl; Gray<br>Fibrous; Inhomogeneous | NAD                             | 25% Cellulose<br>12% Synthetic<br>63% Non-Fibrous |
| 25-11-01776-032                        | 16-1                 |            | Black Paint; Brown<br>Fibrous; Inhomogeneous     | NAD                             | 94% Cellulose<br>6% Non-Fibrous                   |

# Environmental Hazards Services, L.L.C

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**Report Number:** 25-11-01776

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington,  
OH

| Lab Sample Number             | Client Sample Number | Layer Type | Lab Gross Description                      | Asbestos                        | Other Materials                                       |
|-------------------------------|----------------------|------------|--------------------------------------------|---------------------------------|-------------------------------------------------------|
| 25-11-01776-033               | 16-2                 |            | Black Paint; Brown Fibrous; Inhomogeneous  | NAD                             | 94% Cellulose<br>6% Non-Fibrous                       |
| 25-11-01776-034               | 17-1                 |            | Gray Powdery; Brown Fibrous; Inhomogeneous | NAD                             | 32% Cellulose<br>68% Non-Fibrous                      |
| 25-11-01776-035               | 17-2                 |            | Gray Powdery; Brown Fibrous; Inhomogeneous | NAD                             | 34% Cellulose<br>66% Non-Fibrous                      |
| 25-11-01776-036               | 18-1                 |            | Off White Gray Homogeneous                 | 2% Chrysotile                   | 98% Non-Fibrous                                       |
| <b>Total Asbestos: 2%</b>     |                      |            |                                            |                                 |                                                       |
| 25-11-01776-037               | 18-2                 |            |                                            | Did Not Analyze (Positive Stop) |                                                       |
| 25-11-01776-038               | 19-1                 |            | White Paint; Gray Fibrous; Inhomogeneous   | 3% Chrysotile                   | 85% Fibrous Glass<br>12% Non-Fibrous                  |
| <b>Total Asbestos: 3%</b>     |                      |            |                                            |                                 |                                                       |
| Chrsotile present throughout. |                      |            |                                            |                                 |                                                       |
| 25-11-01776-039               | 19-2                 |            |                                            | Did Not Analyze (Positive Stop) |                                                       |
| 25-11-01776-040               | 20-1                 |            | White Paint; Gray Fibrous; Inhomogeneous   | NAD                             | 55% Cellulose<br>25% Fibrous Glass<br>20% Non-Fibrous |

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**Report Number:** 25-11-01776

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington,  
OH

| Lab Sample Number          | Client Sample Number | Layer Type | Lab Gross Description                         | Asbestos                        | Other Materials                                       |
|----------------------------|----------------------|------------|-----------------------------------------------|---------------------------------|-------------------------------------------------------|
| 25-11-01776-041            | 20-2                 |            | White Paint; Gray Fibrous;<br>Inhomogeneous   | NAD                             | 55% Cellulose<br>25% Fibrous Glass<br>20% Non-Fibrous |
| 25-11-01776-042            | 21-1                 |            | Gray Fibrous;<br>Homogeneous                  | 60% Chrysotile                  | 25% Cellulose<br>15% Non-Fibrous                      |
| <b>Total Asbestos: 60%</b> |                      |            |                                               |                                 |                                                       |
| 25-11-01776-043            | 21-2                 |            |                                               | Did Not Analyze (Positive Stop) |                                                       |
| 25-11-01776-044            | 21-3                 |            |                                               | Did Not Analyze (Positive Stop) |                                                       |
| 25-11-01776-045            | 22-1                 |            | Gray Powdery; Brown<br>Fibrous; Inhomogeneous | NAD                             | 26% Cellulose<br>74% Non-Fibrous                      |
| 25-11-01776-046            | 22-2                 |            | Gray Powdery; Brown<br>Fibrous; Inhomogeneous | NAD                             | 26% Cellulose<br>74% Non-Fibrous                      |
| 25-11-01776-047            | 23-1                 |            | Tan Granular;<br>Homogeneous                  | 2% Chrysotile                   | 98% Non-Fibrous                                       |
| <b>Total Asbestos: 2%</b>  |                      |            |                                               |                                 |                                                       |
| 25-11-01776-048            | 23-2                 |            |                                               | Did Not Analyze (Positive Stop) |                                                       |

## Environmental Hazards Services, L.L.C

**Client Number:** 36-6195  
**Project/Test Address:** MAK.166; 21 W Wright Street; Covington,  
OH

**Report Number:** 25-11-01776

| Lab Sample Number | Client Sample Number | Layer Type | Lab Gross Description                    | Asbestos | Other Materials  |
|-------------------|----------------------|------------|------------------------------------------|----------|------------------|
| 25-11-01776-049   | 24-1                 |            | Gray Paint; White Pliable; Inhomogeneous | NAD      | 100% Non-Fibrous |
| 25-11-01776-050   | 24-2                 |            | Gray Paint; White Pliable; Inhomogeneous | NAD      | 100% Non-Fibrous |

**QC Sample:** 107-M22012-4, 108-M22019-3

**QC Blank:** SRM 1866 Fiberglass

**Reporting Limit:** 1% Asbestos

**Method:** EPA Method 600/R-93/116, EPA Method 600/M4-82-020

**Analyst:** Sami Hosn

Reviewed By Authorized Signatory:



Tasha Eaddy  
QA/QC Clerk

These results are based on a comparative visual estimate. The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Each distinct component in an inhomogeneous sample was analyzed separately and reported as a composite. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. All information concerning sampling location, date, and time can be found on Chain-of-Custody. Environmental Hazards Services, L.L.C. does not perform any sample collection. . NVLAP #101882-0 VELAP 460172

Environmental Hazards Services, L.L.C. recommends reanalysis by point count (for more accurate quantification) or Transmission Electron Microscopy (TEM), (for enhanced detection capabilities) for materials regulated by EPA NESHAP (National Emission Standards for Hazardous Air Pollutants) and found to contain less than ten percent (<10%) asbestos by polarized light microscopy (PLM). Both services are available for an additional fee.

400 Point Count Analysis, where noted, performed per EPA Method 600/R-93/116 with a Reporting Limit of 0.25%.

**LEGEND:** NAD = no asbestos detected



## Analyst Signature Page

7469 Whitepine Rd  
North Chesterfield, VA 23237  
Telephone: 800.347.4010

**Report Number:** 25-11-01776

**Client:** Sierra Environment Group Inc.  
1041 Straight Street  
Cincinnati, OH 45214

**Received Date:** 11/11/2025  
**Analyzed Date:** 11/11/2025, 11/12/2025  
**Reported Date:** 11/12/2025

**Client Number:** 36-6195

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington, OH

### Analyst(s)

---

Sami Hosn

Sami Hosn

# ENVIRONMENTAL HAZARDS SERVICES, LLC

## Asbestos Chain of Custody Form

Page 1 of 3

|                                                |  |                                                                                                                                                                                       |  |                                                      |  |                                         |  |
|------------------------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|------------------------------------------------------|--|-----------------------------------------|--|
| Company Name                                   |  | Sierra Environmental Group, INC.                                                                                                                                                      |  | Account #                                            |  | 36-6195                                 |  |
| Company Address                                |  | 1041 Straight Street                                                                                                                                                                  |  | City/State/Zip                                       |  | Cincinnati, Ohio 45214                  |  |
| Phone                                          |  | 513 542 5323                                                                                                                                                                          |  | Email                                                |  | ccsierra@fuse.net and ttsierra@fuse.net |  |
| Project Name/Test Address                      |  | MAK.166 - 21 W Wright Street Covington, OH                                                                                                                                            |  |                                                      |  |                                         |  |
| PO Number                                      |  |                                                                                                                                                                                       |  | Collected By                                         |  | Chuck Callahan/Chris Fath               |  |
| Turn-Around Time                               |  | <input type="radio"/> 5 Day <input checked="" type="radio"/> 3 Day <input type="radio"/> 2 Day <input type="radio"/> 1 Day <input type="radio"/> Same Day / Weekend - Must Call Ahead |  |                                                      |  |                                         |  |
| <input type="checkbox"/> PLM New York Protocol |  | <input type="checkbox"/> PLM New Jersey Protocol                                                                                                                                      |  | <input type="checkbox"/> PLM South Carolina Protocol |  |                                         |  |

| LAB NUMBER | Client Sample ID | Homogeneous Area | Positive Stop | Collection Date & Time | BULK |                 |                  |          | AIR |           |            |                       | COMMENTS |                    |
|------------|------------------|------------------|---------------|------------------------|------|-----------------|------------------|----------|-----|-----------|------------|-----------------------|----------|--------------------|
|            |                  |                  |               |                        | PLM  | Point Count 400 | Point Count 1000 | TEM Bulk | PCM | TEM AHERA | NIOSH 7402 | Time In Total Minutes |          | Flow Rate In L/Min |
| 1          | 1-1              |                  | X             | 11/10/25               | X    |                 |                  |          |     |           |            |                       |          |                    |
| 2          | 1-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 3          | 2-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 4          | 2-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 5          | 3-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 6          | 3-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 7          | 4-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 8          | 4-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 9          | 5-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 10         | 5-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 11         | 5-3              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 12         | 6-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 13         | 6-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 14         | 7-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 15         | 7-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |

|              |                |       |          |       |         |
|--------------|----------------|-------|----------|-------|---------|
| Released By: | Chuck Callahan | Date: | 11/10/25 | Time: | 3:00 PM |
| Signature:   |                |       |          |       |         |

LAB USE ONLY - BELOW THIS LINE

Received By: Bauer  
 Signature: Dan Bauer  
 Date: 11/11/25 Time: 1108 ☐ AM ☐ PM  
☐ Portal Contact Added

7469 WHITEPINE RD, RICHMOND, VA 23237 (800)-347-4010  
 RESULTS VIA CLIENT PORTAL AVAILABLE @ [www.leadlab.com](http://www.leadlab.com)

25-11-01776



Due Date:  
 11/14/2025  
 (Friday)  
 AE M Inv

SDPLM

#1776

**ENVIRONMENTAL HAZARDS SERVICES, LLC**  
Asbestos Chain of Custody Form

Page 2 of 3

| LAB NUMBER | Client Sample ID | Homogeneous Area | Positive Stop | Collection Date & Time | BULK |                 |                  |          | AIR |           |            |                       | COMMENTS |                    |
|------------|------------------|------------------|---------------|------------------------|------|-----------------|------------------|----------|-----|-----------|------------|-----------------------|----------|--------------------|
|            |                  |                  |               |                        | PLM  | Point Count 400 | Point Count 1000 | TEM Bulk | PCM | TEM AHERA | NIOSH 7402 | Time In Total Minutes |          | Flow Rate In L/Min |
| 16         | 8-1              |                  | X             | 11/10/25               | X    |                 |                  |          |     |           |            |                       |          |                    |
| 17         | 8-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 18         | 9-1              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 19         | 9-2              |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 20         | 10-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 21         | 10-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 22         | 11-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 23         | 11-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 24         | 12-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 25         | 12-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 26         | 13-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 27         | 13-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 28         | 14-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 29         | 14-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 30         | 15-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 31         | 15-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 32         | 16-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 33         | 16-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 34         | 17-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 35         | 17-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 36         | 18-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 37         | 18-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 38         | 19-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 39         | 19-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 40         | 20-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 41         | 20-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 42         | 21-1             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 43         | 21-2             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |
| 44         | 21-3             |                  | X             |                        | X    |                 |                  |          |     |           |            |                       |          |                    |

Received By: \_\_\_\_\_

EHS Order #: \_\_\_\_\_

Signature: Danilo Brown

Date: 11/11/25 Time: 11:08 AM AM PM





## Asbestos 400 Point Count Analysis Report

**Report Number:** 25-11-01966

**Client:** Sierra Environment Group Inc.  
1041 Straight Street  
Cincinnati, OH 45214

**Received Date:** 11/11/2025

**Analyzed Date:** 11/12/2025

**Reported Date:** 11/12/2025

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington, OH; EHS# 25-11-01776

**Client Number:**  
36-6195

**Fax Number:**  
513-542-6653

### Laboratory Results

| Lab Sample Number | Client Sample Number | Lab Gross Description     | % Asbestos        | Narrative ID |
|-------------------|----------------------|---------------------------|-------------------|--------------|
| 25-11-01966-001   | 2-1                  | Gray Brittle              | 1.50 % Chrysotile |              |
| 25-11-01966-002   | 3-1                  | Gray Brittle              | 1.25 % Chrysotile |              |
| 25-11-01966-003   | 7-1                  | Tan Granular              | 0.75 % Chrysotile |              |
| 25-11-01966-004   | 7-2                  | Tan Granular              | 0.50 % Chrysotile |              |
| 25-11-01966-005   | 8-1                  | Tan Brittle               | 2.25 % Chrysotile |              |
| 25-11-01966-006   | 10-1                 | Tan Granular              | 0.75 % Chrysotile |              |
| 25-11-01966-007   | 10-2                 | Tan Granular              | 0.50 % Chrysotile |              |
| 25-11-01966-008   | 18-1                 | Off White Granular        | 0.75 % Chrysotile |              |
| 25-11-01966-009   | 18-2                 | Off White Granular        | 0.50 % Chrysotile |              |
| 25-11-01966-010   | 19-1                 | White Paint; Gray Fibrous | 1.75 % Chrysotile |              |
| 25-11-01966-011   | 23-1                 | Tan Granular              | 0.75 % Chrysotile |              |
| 25-11-01966-012   | 23-2                 | Tan Granular              | 0.50 % Chrysotile |              |

## Environmental Hazards Services, L.L.C

**Client Number:** 36-6195

**Report Number:** 25-11-01966

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington, OH;  
EHS# 25-11-01776

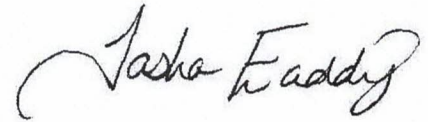
| Lab Sample Number | Client Sample Number | Lab Gross Description | % Asbestos | Narrative ID |
|-------------------|----------------------|-----------------------|------------|--------------|
|-------------------|----------------------|-----------------------|------------|--------------|

**Reporting Limit:** 0.25 % Asbestos

**Method:** EPA Method 600/R-93/116, EPA Method 600/M4-82-020

**Analyst:** Sami Hosn

Reviewed By Authorized Signatory:



Tasha Eaddy  
QA/QC Clerk

The condition of the samples analyzed was acceptable upon receipt per laboratory protocol unless otherwise noted on this report. Results represent the analysis of samples submitted by the client. Sample location, description, area, volume, etc., was provided by the client. This report cannot be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report shall not be reproduced except in full, without the written consent of the Environmental Hazards Service, L.L.C. NVLAP #101882-0 VELAP 460172.

**LEGEND** NAD = No Asbestos Detected



7469 Whitepine Rd  
North Chesterfield, VA 23237  
Telephone: 800.347.4010

Client: Sierra Environment Group Inc.  
1041 Straight Street  
Cincinnati, OH 45214

Client Number: 36-6195

## Analyst Signature Page

**Report Number:** 25-11-01966

**Received Date:** 11/12/2025

**Analyzed Date:** 11/12/2025

**Reported Date:** 11/12/2025

**Project/Test Address:** MAK.166; 21 W Wright Street; Covington, OH; EHS# 25-11-01776

**Analyst(s)**

---

A handwritten signature in black ink, appearing to read "Sami Hosn", is written over a light blue grid background.

Sami Hosn



7469 Whitepine Rd  
North Chesterfield, VA 23237  
Telephone: 800.347.4010

## POINT COUNT REQUEST FORM

25-11-01966



Due Date:

11/17/2025

(Monday)

AE M Inv

Received Date: 11/12/2025

Client #: 36-6195

Company Name: Sierra Environment Group Inc.

Project/Test Address: MAK.166; 21 W Wright Street; Covington, OH; EHS# 25-11-01776

Analysis Requested: 400 Pt

| Client Sample # | EHS Sample #    | Sample Location and/or Comments |
|-----------------|-----------------|---------------------------------|
| 2-1             | 25-11-01776-003 |                                 |
| 3-1             | -005            |                                 |
| 7-1             | -014            |                                 |
| 7-2             | -015            |                                 |
| 8-1             | -016            |                                 |
| 10-1            | -020            |                                 |
| 10-2            | -021            |                                 |
| 18-1            | -036            |                                 |
| 18-2            | -037            |                                 |
| 20-1            | -040            |                                 |
| 23-1            | -047            |                                 |
| 23-2            | -048            |                                 |
|                 |                 |                                 |
|                 |                 |                                 |

| Date Samples Received | Received By | Original Analyst | Date Analyzed | Date Request Received | Received By |
|-----------------------|-------------|------------------|---------------|-----------------------|-------------|
| 11-11-25              | Danick      | Sami             | 11-12-25      | 11-12-25              | Johnny      |



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Anne M. Vogel, Director

10/17/2024

Chuck Callahan  
Sierra Environmental Group  
1041 Straight Street  
Cincinnati, OH 45214

RE: Evaluation Specialist  
Certification Number: ES31960  
Expiration Date: 11/13/2025

Dear Chuck Callahan:

This letter and enclosed certification card approves your request to be certified as an asbestos Evaluation Specialist. You must present your card upon request at any project site while performing duties. Copies of cards are not acceptable as proof of certification.

This certification may be revoked by the Director of the Ohio Environmental Protection Agency (EPA) for violation of any of the requirements of 3745-22 or 3745-20 of the Ohio Administrative Code.

If you have any questions, please contact the Asbestos Program at 614-644-0226 or by email at [asbestoslicensing@epa.ohio.gov](mailto:asbestoslicensing@epa.ohio.gov).

Sincerely,

*Brandon M. Schwendeman*

Brandon Schwendeman  
Manager, Business Operations Support Section  
Ohio EPA - Division of Air Pollution Control

State of Ohio  
Environmental Protection Agency  
Asbestos Program

Asbestos Hazard Evaluation Specialist

**Chuck  
Callahan**  
Sierra Environmental Group  
1041 Straight Street  
Cincinnati OH 45214



**Certification Number**   **Expiration Date**  
**ES31960**   **11/13/25**

DOB: 11/7/69  
Card not Valid  
if Altered



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Anne M. Vogel, Director

3/18/2025

Christopher Fath  
Sierra Environmental Group  
1041 Straight Street  
Cincinnati, OH 45214

RE: Evaluation Specialist  
Certification Number: ES543923  
Expiration Date: 4/6/2026

Dear Christopher Fath:

This letter and enclosed certification card approves your request to be certified as an asbestos Evaluation Specialist. You must present your card upon request at any project site while performing duties. Copies of cards are not acceptable as proof of certification.

This certification may be revoked by the Director of the Ohio Environmental Protection Agency (EPA) for violation of any of the requirements of 3745-22 or 3745-20 of the Ohio Administrative Code.

If you have any questions, please contact the Asbestos Program at 614-644-0226 or by email at [asbestoslicensing@epa.ohio.gov](mailto:asbestoslicensing@epa.ohio.gov).

Sincerely,

*Brandon M. Schwendeman*

Brandon Schwendeman  
Manager, Business Operations Support Section  
Ohio EPA - Division of Air Pollution Control



) • P.O. Box 1049 • Columbus, OH 43216-1049  
) 644-3020 • (614) 644-3184 (fax)