

November 19, 2020

City of Covington, Kentucky
c/o Mr. Zach Hohl
Graydon Head & Ritchey, LLP
312 Walnut Street, Suite 1800
Cincinnati, Ohio 45202

**Re: Follow-up Asbestos Inspection/Hazardous Material Inventory
Former IRS Facility**

W. Fourth Street, Covington, KY
ATC Project Number 241EN00753

Dear Mr. Hohl:

ATC Group Services LLC (ATC) has completed the above-referenced project, in general accordance with ATC Proposal No. 20-20253, dated October 7, 2020. The purpose of the project was to facilitate appropriate materials management in association with pending demolition activities at the site, in addendum to previously presented findings of ATC's *Asbestos Inspection Report*, dated August 20, 2020. Accordingly, our scope of services included a pre-demolition level asbestos inspection to supplement the prior work, and a hazardous materials/universal waste inventory. This letter report documents our findings.

The investigation was limited to the former IRS buildings. The Daycare building in the eastern portion of the site was specifically excluded as it was operational/occupied at the time of our study.

PRE-DEMOLITION LEVEL ASBESTOS INSPECTION

Methodology

Gerald Beaudion and David Gregory, ATC Building Science Manager and Project Manager, respectively, conducted the inspection in October, 2020. Both individuals are Kentucky accredited Asbestos Management Planners/Inspectors. Inspector certifications are provided in Attachment A.

Applicable pre-demolition level investigations were conducted inside the former IRS buildings to determine if suspect asbestos-containing materials (ACMs) were located in areas that were not accessed during our previous inspection. The prior inspection did not include destructive sampling nor sampling of roofing materials, given that it was conducted pre-acquisition.

Twenty-one bulk samples were collected during the supplemental investigation which included destructive methods to access potentially hidden areas of suspect ACMs. The samples were hand-delivered under chain-of-custody (COC) to SanAir Laboratories located in Cincinnati, Ohio, for analysis utilizing polarized light microscopy (PLM). A total of 59 analyses were performed as individual layers of applicable material (e.g., multiple layers of roofing, etc.) were separated and analyzed separately at the laboratory. A comprehensive Bulk Sample Summary is provided in Attachment B. The SanAir laboratory reports and chain-of-custody forms are provided in Attachment C.

Findings

Asbestos-containing insulation was identified inside isolated wooden doors within the former IRS building. Additional cementitious fittings located on fiberglass-insulated pipelines were also identified inside pipe chases and above plaster ceilings. An Asbestos Material Inventory is provided in Attachment D.

HAZARDOUS MATERIALS INVENTORY

The former IRS building was inspected in October 2020 to inventory hazardous materials. Locations and quantities of such materials were identified and inventoried. A comprehensive Regulated Materials and Universal Waste Inventory is provided in Attachment E.

CONCLUSIONS AND RECOMMENDATIONS

The newly identified ACMs are regulated asbestos-containing materials (RACM) in accordance with Commonwealth of Kentucky regulations (401 KAR 58). Kentucky-licensed asbestos personnel must remove these materials prior to demolition in accordance with applicable asbestos regulations.

Newly identified ACMs should be considered an addition to the ACMs identified in ATC's previous asbestos report relative to pending demolition and related asbestos abatement activities. If any other hidden suspect ACM is encountered during demolition, such material(s) should be assumed to be asbestos-containing and handled accordingly or characterized by a Kentucky accredited Asbestos Management Planner/Asbestos Inspector prior to resuming work.

Regulated Materials and Universal Wastes must be removed, properly containerized, labeled, transported and disposed of (or recycled) in accordance with applicable federal and state regulatory requirements (40 CFR Parts 260 - 273 and 401 KAR Chapter 30 - 39, respectively).

Please do not hesitate to contact us if you have questions or comments, or if we can be of further service in any way.

Sincerely,

ATC GROUP SERVICES LLC



Gerald H. Beaudion
Building Science Manager



David Gregory
Project Hygienist



Michael J. Luessen, P.G.
Principal Geologist

Attachments (5)

LIST OF ATTACHMENTS

Attachment A

Inspector Certifications

Attachment B

Asbestos Bulk Sample Summary

Attachment C

Laboratory Reports

Attachment D

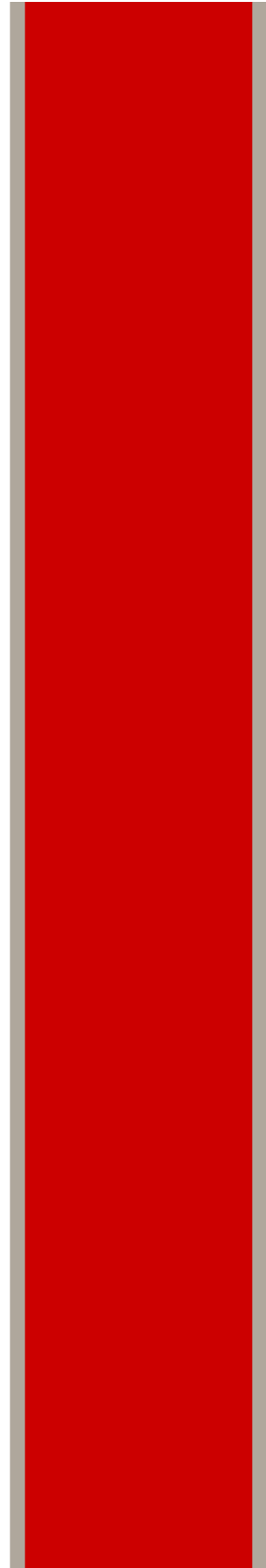
Asbestos Material Inventory

Attachment E

Regulated Materials and Universal Waste Inventory

Attachment A

Inspector Certifications



ANDY BESHEAR
GOVERNOR



REBECCA W. GOODMAN
SECRETARY

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

ANTHONY R. HATTON
COMMISSIONER

300 SOWER BOULEVARD
FRANKFORT, KENTUCKY 40601

March 10, 2020

Gerald H Beaudion
11121 Canal Rd
Cincinnati, Ohio 45241

Asbestos Management Planner
AI Number: 141398
License Number: 64151
Expires: January 9, 2021

Dear **Gerald H Beaudion**:

This is to acknowledge receipt of your application for accreditation as an asbestos abatement professional. Your application has been approved and the above-referenced card is enclosed.

Initial accreditation fee is \$100.00 per person per discipline, except for abatement worker (\$20.00). Renewal fees for accreditations within one year of the expiration date are one-half of the initial fees. Renewals for accreditations expired over one year require the initial fee. There is a \$10.00 duplication charge to replace a lost card. Please also note that the expiration date on your license is determined by the expiration date on the training certificate submitted with your application.

When submitting application packets, please note the following:

- do not staple any of the application materials;
- make sure to fill out the application completely, including your signature; and
- include current proof of training for the discipline(s) for which you are applying

If you have any questions regarding this matter, please call our office at (502) 782-6717.

Sincerely,

Emma Moreo
Field Support Section
Field Operations Branch

Commonwealth of Kentucky
Department for Environmental Protection
Division for Air Quality

Gerald H Beaudion

Has met the requirements of 401 KAR 58:005 and is accredited as an:

Asbestos Management Planner

Agency Interest Id: **141398**
License Number: **64151**
Issue Date: **03/10/2020**
Expiration Date: **01/09/2021**



Commonwealth of Kentucky

Department for Environmental Protection
Division for Air Quality

David J Gregory

Has met the requirements of 401 KAR 58:005 and is accredited as an:

Asbestos Management Planner

Agency Interest Id: **157731**

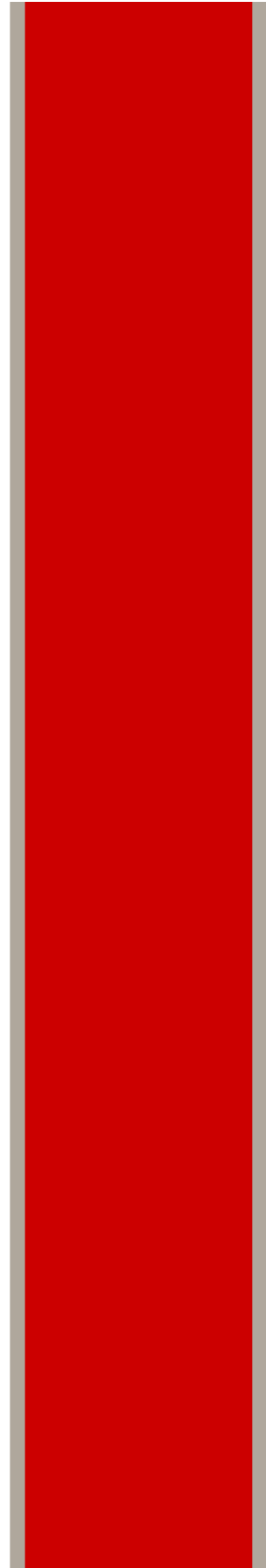
License Number: **65931**

Issue Date: **10/02/2020**

Expiration Date: **08/19/2021**

Attachment B

Asbestos Bulk Sample Summary





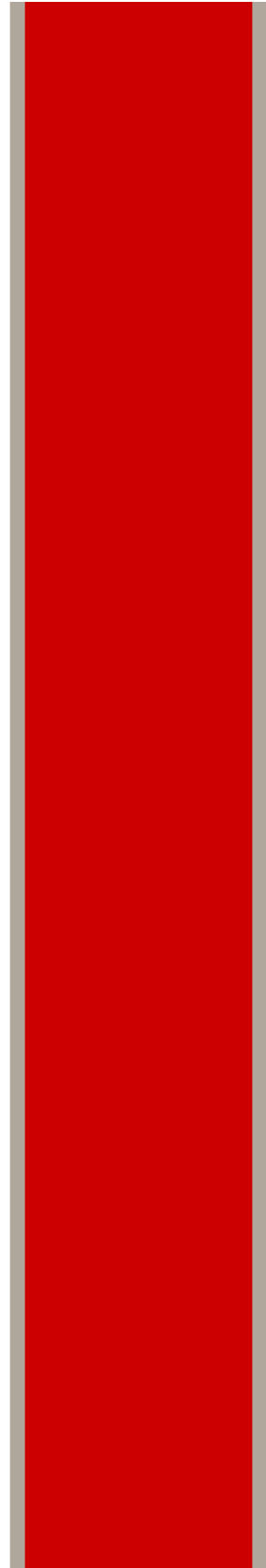
— AN ATLAS COMPANY —

Follow-up Asbestos Inspection and Hazardous Material Inventory
 Project: Former IRS Building, Covington, KY
 ATC Project No. 241EN00753

Asbestos Bulk Sample Summary Former IRS Building W. Fourth Street, Covington, KY				
Area No.	Sample Number	Sample Location	Material Description	Asbestos Analytical Results
Office Building	54-1	Room	Insulation inside Wood Door	None Detected
	54-2	Room 7/8	Insulation inside Wood Door	12% Chrysotile
Area 11	55-1	Open Area – North Wall	Soundproofing Wall Panels	None Detected
	55-2	Open Area – East Wall	Soundproofing Wall Panels	None Detected
Area 1	56-1	Room 103	Insulation inside Metal Door	None Detected
Area	56-2	Room	Insulation inside Metal Door	None Detected
Roof	57-1	Area 8	Roof Core	None Detected
	57-2		Roof Core	None Detected
	57-3		Roof Core	None Detected
	57-4	Area 7	Roof Core	None Detected
	57-5	Area 1	Roof Core	None Detected
	57-6	Area 6	Roof Core	None Detected
	57-7	Area 11	Roof Core	None Detected
	57-8	Area 3	Roof Core	None Detected
	57-9	Area 2	Roof Core	None Detected
	57-10	Office	Roof Core	None Detected
	57-11		Roof Core	None Detected
	57-12	Area 13	Roof Core	None Detected
	57-13		Roof Core	None Detected
	57-14	Central Plant	Roof Core	None Detected
	57-15		Roof Core	None Detected

Attachment C

Laboratory Reports





The Identification Specialists

Analysis Report
prepared for
ATC Group Services - OH

Report Date: 10/26/2020

Project Name: IRS Covington

Project #: 241EN00753

SanAir ID#: 20059387



NVLAP LAB CODE 600227-0

11709 Chesterdale Road | Cincinnati, Ohio 45246
888.895.1177 | 513.438.6006 | IAQ@SanAir.com | SanAir.com



SanAir ID Number
20059387
FINAL REPORT
10/26/2020 2:12:30 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/23/2020
Received Date: 10/26/2020 8:30:00 AM

Dear Dave Gregory,

We at SanAir would like to thank you for the work you recently submitted. The 4 sample(s) were received on Monday, October 26, 2020 via Hand Delivered. The final report(s) is enclosed for the following sample(s): 54-1, 54-2, 55-1, 55-2.

These results only pertain to this job and should not be used in the interpretation of any other job. This report is only complete in its entirety. Refer to the listing below of the pages included in a complete final report.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Daigneault", with a stylized flourish at the end.

Matthew Daigneault
Asbestos Laboratory Manager
SanAir Technologies Laboratory

Final Report Includes:

- Cover Letter
- Analysis Pages
- Disclaimers and Additional Information

Sample conditions:

- 4 samples in Good condition.



SanAir ID Number
20059387
 FINAL REPORT
 10/26/2020 2:12:30 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/23/2020
Received Date: 10/26/2020 8:30:00 AM

Analyst: Leitholf, Andrew

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic	Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous	
54-1 / 20059387-001 Door Insert, Door Insert	White Non-Fibrous Homogeneous	10% Cellulose 5% Glass	85% Other	None Detected
54-1 / 20059387-001 Door Insert, Door Insert	Grey Non-Fibrous Homogeneous		40% Perlite 60% Other	None Detected
54-2 / 20059387-002 Door Insert	Grey Non-Fibrous Homogeneous		88% Other	12% Chrysotile
55-1 / 20059387-003 Wall Soundproofing	Tan Non-Fibrous Homogeneous	30% Cellulose 15% Glass	25% Perlite 30% Other	None Detected
55-2 / 20059387-004 Wall Soundproofing	Tan Non-Fibrous Homogeneous	30% Cellulose 15% Glass	25% Perlite 30% Other	None Detected

Analyst: *Andrew Leitholf*

Approved Signatory: *Johnathan Wilson*

Analysis Date: 10/26/2020

Date: 10/26/2020

Disclaimer

The final report cannot be reproduced, except in full, without written authorization from SanAir. Fibers smaller than 5 microns cannot be seen with this method due to scope limitations. The accuracy of the results is dependent upon the client's sampling procedure and information provided to the laboratory by the client. SanAir assumes no responsibility for the sampling procedure and will provide evaluation reports based solely on the sample and information provided by the client. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Samples are held for a period of 60 days.

For NY state samples, method EPA 600/M4-82-020 is performed.

Polarized- light microscopy is not consistently reliable in detecting asbestos in floor covering 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.

Asbestos Certifications NVLAP lab code 600227-0
Rhode Island Certification Number: PLM00144



1551 Oakbridge Dr. STE B
 Powhatan, VA 23139
 804.897.1177 / 888.895.1177
 Fax 804.897.0070
 sanair.com

Asbestos
Chain of Custody
 Form 140, Rev 3, 8/28/19

SanAir ID Number
 20059387

Company: ATC Group Services LLC		Project #: 241EN00753	Collected by:
Address: 11121 Canal Road		Project Name: IRS Covington	Phone #:
City, St., Zip: Cincinnati		Date Collected: 10/23/20	Fax #:
State of Collection: KY	Account#:	P.O. Number:	Email: david.gregory@atcgs.com

Bulk		Air		Soil	
ABB	PLM EPA 600/R-93/116 <input checked="" type="checkbox"/>	ABA	PCM NIOSH 7400 <input type="checkbox"/>	ABSE	PLM EPA 600/R-93/116 (Qual.) <input type="checkbox"/>
	Positive Stop <input type="checkbox"/>	ABA-2	OSHA w/ TWA* <input type="checkbox"/>	Vermiculite & Soil	
ABEPA	PLM EPA 400 Point Count <input type="checkbox"/>	ABTEM	TEM AHERA <input type="checkbox"/>	ABSP	PLM CARB 435 (LOD <1%) <input type="checkbox"/>
ABB1K	PLM EPA 1000 Point Count <input type="checkbox"/>	ABATN	TEM NIOSH 7402 <input type="checkbox"/>	ABSP1	PLM CARB 435 (LOD 0.25%) <input type="checkbox"/>
ABBEN	PLM EPA NOB** <input type="checkbox"/>	ABT2	TEM Level II <input type="checkbox"/>	ABSP2	PLM CARB 435 (LOD 0.1%) <input type="checkbox"/>
ABBCH	TEM Chatfield** <input type="checkbox"/>	Other:	<input type="checkbox"/>	Dust	
ABBTM	TEM EPA NOB** <input type="checkbox"/>	New York ELAP		ABWA	TEM Wipe ASTM D-6480 <input type="checkbox"/>
ABQ	PLM Qualitative <input type="checkbox"/>	ABEPA2	NY ELAP 198.1 <input type="checkbox"/>	ABDMV	TEM Microvac ASTM D-5755 <input type="checkbox"/>
** Available on 24-hr. to 5-day TAT		ABENY	NY ELAP 198.6 PLM NOB <input type="checkbox"/>	Matrix Other	
Water		ABBNY	NY ELAP 198.4 TEM NOB <input type="checkbox"/>		<input type="checkbox"/>
ABHE	EPA 100.2 <input type="checkbox"/>				

Turn Around Times	3 HR (4 HR TEM) <input type="checkbox"/>	6 HR (8HR TEM) <input type="checkbox"/>	12 HR <input type="checkbox"/>	1 Day <input checked="" type="checkbox"/>
	2 Days <input type="checkbox"/>	3 Days <input type="checkbox"/>	4 Days <input type="checkbox"/>	5 Days <input type="checkbox"/>

Special Instructions | E-Mail david.gregory@atcgs.com and melissa.kelley@atcgs.com with results

Sample #	Sample Identification/Location	Volume or Area	Sample Date	Flow Rate*	Start - Stop Time*
54-1	Door Insert				
54-2	Door Insert				
55-1	Wall Soundproofing				
55-2	Wall Soundproofing				

Relinquished by	Date	Time	Received by	Date	Time
Dave Sfg	10/26/20		MYH	10/26/20	8:20am

If no technician is provided, then the primary contact for your account will be selected. Unless scheduled, the turnaround time for all samples received after 3 pm EST will be logged in the next business day. Weekend or holiday work must be scheduled ahead of time and is charged at 150% of the 3hr TAT or a minimum charge of \$150. A courier charge will be applied for same day and one-day turnaround times for offsite work. SanAir covers Standard Overnight FedEx shipping. Shipments billed to SanAir with a faster shipping rate will result in additional charges.



The Identification Specialists

Analysis Report
prepared for
ATC Group Services - OH

Report Date: 10/27/2020

Project Name: IRS Covington

Project #: 241EN00753

SanAir ID#: 20059700



NVLAP LAB CODE 600227-0

11709 Chesterdale Road | Cincinnati, Ohio 45246
888.895.1177 | 513.438.6006 | IAQ@SanAir.com | SanAir.com



SanAir ID Number
20059700
FINAL REPORT
10/27/2020 4:06:18 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/26/2020
Received Date: 10/27/2020 8:30:00 AM

Dear Dave Gregory,

We at SanAir would like to thank you for the work you recently submitted. The 2 sample(s) were received on Tuesday, October 27, 2020 via Hand Delivered. The final report(s) is enclosed for the following sample(s): 56-1, 56-2.

These results only pertain to this job and should not be used in the interpretation of any other job. This report is only complete in its entirety. Refer to the listing below of the pages included in a complete final report.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Daigneault".

Matthew Daigneault
Asbestos Laboratory Manager
SanAir Technologies Laboratory

Final Report Includes:
- Cover Letter
- Analysis Pages
- Disclaimers and Additional Information

Sample conditions:
- 2 samples in Good condition.



SanAir ID Number
20059700
 FINAL REPORT
 10/27/2020 4:06:18 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/26/2020
Received Date: 10/27/2020 8:30:00 AM

Analyst: Giglio, Evaristo

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic	Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous	
56-1 / 20059700-001 Fire Door Insert, Paper	Brown Fibrous Heterogeneous	90% Cellulose	10% Other	None Detected
56-1 / 20059700-001 Fire Door Insert, Mastic	Brown Non-Fibrous Heterogeneous	60% Cellulose	40% Other	None Detected
56-2 / 20059700-002 Fire Door Insert, Paper	Brown Fibrous Heterogeneous	90% Cellulose	10% Other	None Detected
56-2 / 20059700-002 Fire Door Insert, Mastic	Brown Non-Fibrous Heterogeneous	60% Cellulose	40% Other	None Detected

Analyst: *La Giglio*

Approved Signatory: *Matt Giglio*

Analysis Date: 10/27/2020

Date: 10/27/2020

Disclaimer

The final report cannot be reproduced, except in full, without written authorization from SanAir. Fibers smaller than 5 microns cannot be seen with this method due to scope limitations. The accuracy of the results is dependent upon the client's sampling procedure and information provided to the laboratory by the client. SanAir assumes no responsibility for the sampling procedure and will provide evaluation reports based solely on the sample and information provided by the client. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Samples are held for a period of 60 days.

For NY state samples, method EPA 600/M4-82-020 is performed.

Polarized- light microscopy is not consistently reliable in detecting asbestos in floor covering 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.

Asbestos Certifications NVLAP lab code 600227-0
Rhode Island Certification Number: PLM00144



1551 Oakbridge Dr. STE B
 Powhatan, VA 23139
 804.897.1177 / 888.895.1177
 Fax 804.897.0070
 sanair.com

**Asbestos
 Chain of Custody**
 Form 140, Rev 3, 8/28/19

SanAir ID Number
 20059700

Company: ATC Group Services LLC		Project #: 241EN00753	Collected by:
Address: 11121 Canal Road		Project Name: IRS Covington	Phone #:
City, St., Zip: Cincinnati		Date Collected: 10/26/20	Fax #:
State of Collection: KY	Account#:	P.O. Number:	Email: david.gregory@atcgs.com

Bulk		Air		Soil	
ABB	PLM EPA 600/R-93/116 <input checked="" type="checkbox"/>	ABA	PCM NIOSH 7400 <input type="checkbox"/>	ABSE	PLM EPA 600/R-93/116 (Qual.) <input type="checkbox"/>
	Positive Stop <input type="checkbox"/>	ABA-2	OSHA w/ TWA* <input type="checkbox"/>	Vermiculite & Soil	
ABEPA	PLM EPA 400 Point Count <input type="checkbox"/>	ABTEM	TEM AHERA <input type="checkbox"/>	ABSP	PLM CARB 435 (LOD <1%) <input type="checkbox"/>
ABB1K	PLM EPA 1000 Point Count <input type="checkbox"/>	ABATN	TEM NIOSH 7402 <input type="checkbox"/>	ABSP1	PLM CARB 435 (LOD 0.25%) <input type="checkbox"/>
ABBEN	PLM EPA NOB** <input type="checkbox"/>	ABT2	TEM Level II <input type="checkbox"/>	ABSP2	PLM CARB 435 (LOD 0.1%) <input type="checkbox"/>
ABBCH	TEM Chatfield** <input type="checkbox"/>	Other:	<input type="checkbox"/>	Dust	
ABBTM	TEM EPA NOB** <input type="checkbox"/>	New York ELAP		ABWA	TEM Wipe ASTM D-6480 <input type="checkbox"/>
ABQ	PLM Qualitative <input type="checkbox"/>	ABEPA2	NY ELAP 198.1 <input type="checkbox"/>	ABDMV	TEM Microvac ASTM D-5755 <input type="checkbox"/>
** Available on 24-hr. to 5-day TAT		ABENY	NY ELAP 198.6 PLM NOB <input type="checkbox"/>	Matrix	Other <input type="checkbox"/>
Water		ABBNY	NY ELAP 198.4 TEM NOB <input type="checkbox"/>		
ABHE	EPA 100.2 <input type="checkbox"/>				

Turn Around Times	3 HR (4 HR TEM) <input type="checkbox"/>	6 HR (8HR TEM) <input type="checkbox"/>	12 HR <input type="checkbox"/>	1 Day <input checked="" type="checkbox"/>
	2 Days <input type="checkbox"/>	3 Days <input type="checkbox"/>	4 Days <input type="checkbox"/>	5 Days <input type="checkbox"/>

Special Instructions E-Mail david.gregory@atcgs.com and gerald.beaudion@atcgs.com with results

Sample #	Sample Identification/Location	Volume or Area	Sample Date	Flow Rate*	Start - Stop Time*
56-1	Fire Door Insert				
56-2	Fire Door Insert				

Relinquished by	Date	Time	Received by	Date	Time
Dave Siff	10/27/20		MCA	10/27/20	8:08AM

If no technician is provided, then the primary contact for your account will be selected. Unless scheduled, the turnaround time for all samples received after 3 pm EST will be logged in the next business day. Weekend or holiday work must be scheduled ahead of time and is charged at 150% of the 3hr TAT or a minimum charge of \$150. A courier charge will be applied for same day and one-day turnaround times for offsite work. SanAir covers Standard Overnight FedEx shipping. Shipments billed to SanAir with a faster shipping rate will result in additional charges.



The Identification Specialists

Analysis Report
prepared for
ATC Group Services - OH

Report Date: 11/3/2020

Project Name: IRS Covington

Project #: 241EN00753

SanAir ID#: 20060372



NVLAP LAB CODE 600227-0

11709 Chesterdale Road | Cincinnati, Ohio 45246
888.895.1177 | 513.438.6006 | IAQ@SanAir.com | SanAir.com



SanAir ID Number
20060372
FINAL REPORT
11/3/2020 3:57:28 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/28/2020
Received Date: 10/29/2020 10:35:00 AM

Dear Dave Gregory,

We at SanAir would like to thank you for the work you recently submitted. The 15 sample(s) were received on Thursday, October 29, 2020 via Hand Delivered. The final report(s) is enclosed for the following sample(s): 57-1, 57-2, 57-3, 57-4, 57-5, 57-6, 57-7, 57-8, 57-9, 57-10, 57-11, 57-12, 57-13, 57-14, 57-15.

These results only pertain to this job and should not be used in the interpretation of any other job. This report is only complete in its entirety. Refer to the listing below of the pages included in a complete final report.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Daigneault", with a stylized flourish at the end.

Matthew Daigneault
Asbestos Laboratory Manager
SanAir Technologies Laboratory

Final Report Includes:

- Cover Letter
- Analysis Pages
- Disclaimers and Additional Information

Sample conditions:

- 15 samples in Good condition.



SanAir ID Number
20060372
 FINAL REPORT
 11/3/2020 3:57:28 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/28/2020
Received Date: 10/29/2020 10:35:00 AM

Analyst: Giglio, Evaristo | Poeppelman, Dustin

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic	Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous	
57-1 / 20060372-001 Roofing Materials - Area 8, Tar Paper	Black Non-Fibrous Homogeneous	15% Glass	85% Other	None Detected
57-1 / 20060372-001 Roofing Materials - Area 8, Flashing	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other	None Detected
57-1 / 20060372-001 Roofing Materials - Area 8, Insulation	Brown Fibrous Homogeneous	95% Cellulose	5% Other	None Detected
57-2 / 20060372-002 Roofing Materials - Area 8, Tar Paper	Black Non-Fibrous Homogeneous	15% Glass	85% Other	None Detected
57-2 / 20060372-002 Roofing Materials - Area 8, Flashing	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other	None Detected
57-2 / 20060372-002 Roofing Materials - Area 8, Insulation	Brown Fibrous Homogeneous	95% Cellulose	5% Other	None Detected
57-3 / 20060372-003 Roofing Materials - Area 8, Wrap	Black Non-Fibrous Homogeneous	15% Synthetic	85% Other	None Detected
57-3 / 20060372-003 Roofing Materials - Area 8, Insulation	Black Non-Fibrous Homogeneous	< 1% Cellulose	20% Mica 80% Other	None Detected
57-3 / 20060372-003 Roofing Materials - Area 8, Foam Insulation	Brown Fibrous Homogeneous		100% Other	None Detected
57-3 / 20060372-003 Roofing Materials - Area 8, Tar	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other	None Detected

Analyst:

Approved Signatory:

Analysis Date: 11/3/2020

Date: 11/3/2020



SanAir ID Number
20060372
 FINAL REPORT
 11/3/2020 3:57:28 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/28/2020
Received Date: 10/29/2020 10:35:00 AM

Analyst: Giglio, Evaristo | Poepelman, Dustin

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic		Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous		
57-4 / 20060372-004 Roofing Materials - Area 7, Wrap	Black Non-Fibrous Homogeneous	15% Synthetic	85% Other		None Detected
57-4 / 20060372-004 Roofing Materials - Area 7, Insulation	Black Non-Fibrous Homogeneous	< 1% Cellulose	20% Mica 80% Other		None Detected
57-4 / 20060372-004 Roofing Materials - Area 7, Foam Insulation	Brown Fibrous Homogeneous		100% Other		None Detected
57-4 / 20060372-004 Roofing Materials - Area 7, Tar	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other		None Detected
57-5 / 20060372-005 Roofing Materials - Area 1, Wrap	Black Non-Fibrous Homogeneous	15% Synthetic	85% Other		None Detected
57-5 / 20060372-005 Roofing Materials - Area 1, Insulation	Black Non-Fibrous Homogeneous	< 1% Cellulose	20% Mica 80% Other		None Detected
57-5 / 20060372-005 Roofing Materials - Area 1, Foam Insulation	Brown Fibrous Homogeneous		100% Other		None Detected
57-5 / 20060372-005 Roofing Materials - Area 1, Tar	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other		None Detected
57-6 / 20060372-006 Roofing Materials - Area 6, Wrap	Black Non-Fibrous Homogeneous	15% Synthetic	85% Other		None Detected
57-6 / 20060372-006 Roofing Materials - Area 6, Insulation	Black Non-Fibrous Homogeneous	< 1% Cellulose	20% Mica 80% Other		None Detected

Analyst:

Approved Signatory:

Analysis Date: 11/3/2020

Date: 11/3/2020



SanAir ID Number
20060372
 FINAL REPORT
 11/3/2020 3:57:28 PM

Name: ATC Group Services - OH
Address: 11121 Canal Road
 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
P.O. Number:
Project Name: IRS Covington
Collected Date: 10/28/2020
Received Date: 10/29/2020 10:35:00 AM

Analyst: Giglio, Evaristo | Poepelman, Dustin

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic		Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous		
57-6 / 20060372-006 Roofing Materials - Area 6, Foam Insulation	Brown Fibrous Homogeneous		100% Other		None Detected
57-6 / 20060372-006 Roofing Materials - Area 6, Tar	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other		None Detected
57-7 / 20060372-007 Roofing Materials - Area 11, Wrap	Black Non-Fibrous Homogeneous	15% Synthetic	85% Other		None Detected
57-7 / 20060372-007 Roofing Materials - Area 11, Insulation	Black Non-Fibrous Homogeneous	< 1% Cellulose	20% Mica 80% Other		None Detected
57-7 / 20060372-007 Roofing Materials - Area 11, Foam Insulation	Brown Fibrous Homogeneous		100% Other		None Detected
57-7 / 20060372-007 Roofing Materials - Area 11, Tar	Black Non-Fibrous Homogeneous	< 1% Cellulose	100% Other		None Detected
57-8 / 20060372-008 Roofing Materials - Area 3, Tar & Gravel	Black Non-Fibrous Heterogeneous	2% Cellulose	8% Quartz 90% Other		None Detected
57-8 / 20060372-008 Roofing Materials - Area 3, Insulation	Tan Non-Fibrous Heterogeneous	20% Cellulose	15% Mica 65% Other		None Detected
57-8 / 20060372-008 Roofing Materials - Area 3, Foam Insulation	Yellow Non-Fibrous Heterogeneous	10% Glass	90% Other		None Detected
57-9 / 20060372-009 Roofing Materials - Area 2, Tar & Gravel	Black Non-Fibrous Heterogeneous	2% Cellulose	8% Quartz 90% Other		None Detected

Analyst: *La Bighi*

Approved Signatory: *Matthew J. #*

Analysis Date: 11/3/2020

Date: 11/3/2020



SanAir ID Number
20060372
 FINAL REPORT
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Name: ATC Group Services - OH
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Received Date: 10/29/2020 10:35:00 AM

Analyst: Giglio, Evaristo | Poepelman, Dustin

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic	Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous	
57-9 / 20060372-009 Roofing Materials - Area 2, Insulation	Tan Non-Fibrous Heterogeneous	20% Cellulose	15% Mica 65% Other	None Detected
57-9 / 20060372-009 Roofing Materials - Area 2, Foam Insulation	Yellow Non-Fibrous Heterogeneous	10% Glass	90% Other	None Detected
57-10 / 20060372-010 Roofing Materials - Office, Tar Paper Layers	Black Non-Fibrous Heterogeneous	50% Glass	50% Other	None Detected
57-10 / 20060372-010 Roofing Materials - Office, Insulation	Tan Non-Fibrous Heterogeneous	20% Cellulose	15% Mica 65% Other	None Detected
57-11 / 20060372-011 Roofing Materials - Office, Tar Paper Layers	Black Non-Fibrous Heterogeneous	50% Glass	50% Other	None Detected
57-11 / 20060372-011 Roofing Materials - Office, Insulation	Tan Non-Fibrous Heterogeneous	20% Cellulose	15% Mica 65% Other	None Detected
57-12 / 20060372-012 Roofing Materials - Areas 12 and 13, Tar	Black Non-Fibrous Heterogeneous		100% Other	None Detected
57-12 / 20060372-012 Roofing Materials - Areas 12 and 13, Insulation Backing	Grey Fibrous Heterogeneous	70% Cellulose 20% Glass	10% Other	None Detected
57-12 / 20060372-012 Roofing Materials - Areas 12 and 13, Foam Insulation	Yellow Non-Fibrous Heterogeneous		100% Other	None Detected
57-13 / 20060372-013 Roofing Materials - Areas 12 and 13, Tar Paper Layers	Black Non-Fibrous Heterogeneous	50% Glass	50% Other	None Detected

Analyst: *La Bighi*

Approved Signatory: *Matthew J. #*

Analysis Date: 11/3/2020

Date: 11/3/2020



SanAir ID Number
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 11/3/2020 3:57:28 PM

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 Cincinnati, OH 45241
Phone: 337-262-4773

Project Number: 241EN00753
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Project Name: IRS Covington
Collected Date: 10/28/2020
Received Date: 10/29/2020 10:35:00 AM

Analyst: Giglio, Evaristo | Poepelman, Dustin

Asbestos Bulk PLM EPA 600/R-93/116

SanAir ID / Description	Stereoscopic		Components		Asbestos Fibers
	Appearance	% Fibrous	% Non-fibrous		
57-13 / 20060372-013 Roofing Materials - Areas 12 and 13, Insulation Backing	Grey Fibrous Heterogeneous	70% Cellulose 20% Glass	10% Other		None Detected
57-13 / 20060372-013 Roofing Materials - Areas 12 and 13, Foam Insulation	Yellow Non-Fibrous Heterogeneous		100% Other		None Detected
57-14 / 20060372-014 Roofing Materials - Mechanical Building, Tar Paper	Black Non-Fibrous Heterogeneous	45% Cellulose	55% Other		None Detected
57-14 / 20060372-014 Roofing Materials - Mechanical Building, Felt	Brown Fibrous Heterogeneous	75% Cellulose	15% Perlite 10% Other		None Detected
57-14 / 20060372-014 Roofing Materials - Mechanical Building, Insulation Backing	Black Fibrous Heterogeneous	70% Cellulose 20% Glass	10% Other		None Detected
57-14 / 20060372-014 Roofing Materials - Mechanical Building, Foam Insulation	Yellow Non-Fibrous Heterogeneous		100% Other		None Detected
57-15 / 20060372-015 Roofing Materials - Mechanical Building, Tar Paper	Black Non-Fibrous Heterogeneous	45% Cellulose	55% Other		None Detected
57-15 / 20060372-015 Roofing Materials - Mechanical Building, Felt	Brown Fibrous Heterogeneous	75% Cellulose	15% Perlite 10% Other		None Detected
57-15 / 20060372-015 Roofing Materials - Mechanical Building, Insulation Backing	Grey Fibrous Heterogeneous	70% Cellulose 20% Glass	10% Other		None Detected
57-15 / 20060372-015 Roofing Materials - Mechanical Building, Foam Insulation	Yellow Non-Fibrous Heterogeneous		100% Other		None Detected

Analyst: *La Bello*

Approved Signatory: *Matthew J. #*

Analysis Date: 11/3/2020

Date: 11/3/2020

Disclaimer

The final report cannot be reproduced, except in full, without written authorization from SanAir. Fibers smaller than 5 microns cannot be seen with this method due to scope limitations. The accuracy of the results is dependent upon the client's sampling procedure and information provided to the laboratory by the client. SanAir assumes no responsibility for the sampling procedure and will provide evaluation reports based solely on the sample and information provided by the client. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Samples are held for a period of 60 days.

For NY state samples, method EPA 600/M4-82-020 is performed.

Polarized- light microscopy is not consistently reliable in detecting asbestos in floor covering 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.

Asbestos Certifications NVLAP lab code 600227-0
Rhode Island Certification Number: PLM00144



1551 Oakbridge Dr. STE B
 Powhatan, VA 23139
 804.897.1177 / 888.895.1177
 Fax 804.897.0070
sanair.com

Asbestos
Chain of Custody
 Form 140, Rev 3, 8/28/19

SanAir ID Number
 20060372

Company: ATC Group Services LLC		Project #: 241EN00753	Collected by:
Address: 11121 Canal Road		Project Name: IRS Covington	Phone #:
City, St., Zip: Cincinnati		Date Collected: 10/28/20	Fax #:
State of Collection: KY	Account#:	P.O. Number:	Email: david.gregory@atcgs.com

Bulk			Air			Soil		
ABB	PLM EPA 600/R-93/116	<input checked="" type="checkbox"/>	ABA	PCM NIOSH 7400	<input type="checkbox"/>	ABSE	PLM EPA 600/R-93/116 (Qual.)	<input type="checkbox"/>
	Positive Stop	<input type="checkbox"/>	ABA-2	OSHA w/ TWA*	<input type="checkbox"/>	Vermiculite & Soil		
ABEPA	PLM EPA 400 Point Count	<input type="checkbox"/>	ABTEM	TEM AHERA	<input type="checkbox"/>	ABSP	PLM CARB 435 (LOD <1%)	<input type="checkbox"/>
ABB1K	PLM EPA 1000 Point Count	<input type="checkbox"/>	ABATN	TEM NIOSH 7402	<input type="checkbox"/>	ABSP1	PLM CARB 435 (LOD 0.25%)	<input type="checkbox"/>
ABBEN	PLM EPA NOB**	<input type="checkbox"/>	ABT2	TEM Level II	<input type="checkbox"/>	ABSP2	PLM CARB 435 (LOD 0.1%)	<input type="checkbox"/>
ABBCH	TEM Chatfield**	<input type="checkbox"/>	Other:		<input type="checkbox"/>	Dust		
ABBTM	TEM EPA NOB**	<input type="checkbox"/>	New York ELAP			ABWA	TEM Wipe ASTM D-6480	<input type="checkbox"/>
ABQ	PLM Qualitative	<input type="checkbox"/>	ABEPA2	NY ELAP 198.1	<input type="checkbox"/>	ABDMV	TEM Microvac ASTM D-5755	<input type="checkbox"/>
** Available on 24-hr. to 5-day TAT			ABENY	NY ELAP 198.6 PLM NOB	<input type="checkbox"/>	Matrix Other		
Water			ABBNY	NY ELAP 198.4 TEM NOB	<input type="checkbox"/>	<input type="checkbox"/>		
ABHE	EPA 100.2	<input type="checkbox"/>						

Turn Around Times	3 HR (4 HR TEM) <input type="checkbox"/>	6 HR (8HR TEM) <input type="checkbox"/>	12 HR <input type="checkbox"/>	1 Day <input type="checkbox"/>
	2 Days	<input type="checkbox"/> 3 Days	<input type="checkbox"/> 4 Days	<input checked="" type="checkbox"/> 5 Days

Special Instructions E-Mail david.gregory@atcgs.com and gerald.beaudion@atcgs.com with results

Sample #	Sample Identification/Location	Volume or Area	Sample Date	Flow Rate*	Start - Stop Time*
57-1	Roofing Materials - Area 8				
57-2	Roofing Materials - Area 8				
57-3	Roofing Materials - Area 8				
57-4	Roofing Materials - Area 7				
57-5	Roofing Materials - Area 1				
57-6	Roofing Materials - Area 6				
57-7	Roofing Materials - Area 11				
57-8	Roofing Materials - Area 3				
57-9	Roofing Materials - Area 2				
57-10	Roofing Materials - Office				
57-11	Roofing Materials - Office				
57-12	Roofing Materials - Areas 12 & 13				

Relinquished by	Date	Time	Received by	Date	Time
Dave Hyl	10/29/20		ALD	10/29/20	1035 AM

If no technician is provided, then the primary contact for your account will be selected. Unless scheduled, the turnaround time for all samples received after 3 pm EST will be logged in the next business day. Weekend or holiday work must be scheduled ahead of time and is charged at 150% of the 3hr TAT or a minimum charge of \$150. A courier charge will be applied for same day and one-day turnaround times for offsite work. SanAir covers Standard Overnight FedEx shipping. Shipments billed to SanAir with a faster shipping rate will result in additional charges.

20060372

Sample #	Sample Identification/Location	Volume or Area	Sample Date	Flow Rate*	Start - Stop Time*
57-13	Roofing Materials - Areas 12& 13				
57-14	Roofing Materials - Mechanical Building				
57-15	Roofing Materials - Mechanical Building				

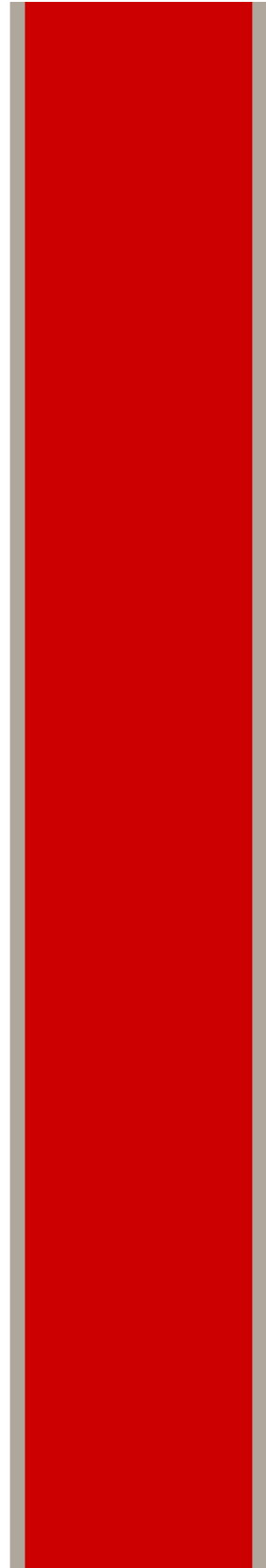
Special Instructions	
----------------------	--

Relinquished by	Date	Time	Received by	Date	Time
Dave [Signature]	10/29/20		MD	10/29/20	1035 AM

If no technician is provided, then the primary contact for your account will be selected. Unless scheduled, the turnaround time for all samples received after 3 pm EST will be logged in the next business day. Weekend or holiday work must be scheduled ahead of time and is charged at 150% of the 3hr TAT or a minimum charge of \$150. A courier charge will be applied for same day and one-day turnaround times for offsite work. SanAir covers Standard Overnight FedEx shipping. Shipments billed to SanAir with a faster shipping rate will result in additional charges.

Attachment D

Asbestos Material Inventory





— AN ATLAS COMPANY —

Asbestos Material Inventory¹ Former IRS Building W. Fourth Street, Covington, KY					
Area No.	Room No.	Material Description and Location	NESHAP Category	Condition	Estimated Quantity
Office Building	1	Cementitious Fittings (pipe chase)	RACM ²	Friable	3 fittings
	3	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	Restrooms 4/5	Cementitious Fittings (pipe chases)	RACM	Friable	20 fittings
	6	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	7/8	Cementitious Fittings (pipe chase)	RACM	Friable	2 fitting
		Insulation inside Wood Door	RACM	Friable	1 door
	15	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	17	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	19	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	21	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	23	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	25	Cementitious Fittings (pipe chase)	RACM	Friable	1 fitting
	26	Cementitious Fittings (pipe chase)	RACM	Friable	3 fittings
	27	Cementitious Fittings (pipe chase)	RACM	Friable	2 fittings
		Insulation inside Wood Door	RACM	Friable	1 door
	30	Insulation inside Wood Door	RACM	Friable	1 door
	31	Insulation inside Wood Door	RACM	Friable	1 door
	32	Insulation inside Wood Door	RACM	Friable	1 door
	Restrooms 35/36	Cementitious Fittings (pipe chases & above plaster ceiling)	RACM	Friable	25 fittings

¹ Refer to ATC's Asbestos Inspection Report dated August 20, 2020 for other ACMs identified at the site.

² RACM = Regulated Asbestos Containing Material



— AN ATLAS COMPANY —

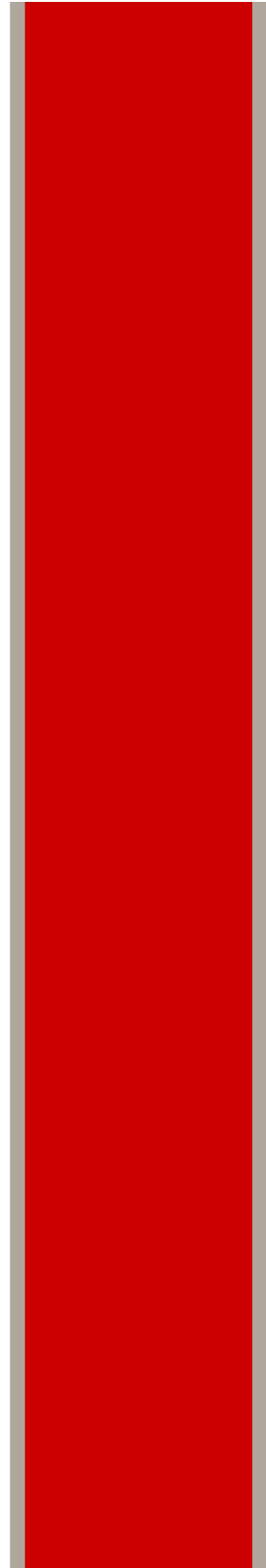
Asbestos Material Inventory Former IRS Building W. Fourth Street, Covington, KY					
Area No.	Room No.	Material Description and Location	NESHAP Category	Condition	Estimated Quantity
Office Building	39	Insulation inside Wood Door	RACM	Friable	1 door
	41	Cementitious Fittings (pipe chases & above plaster ceiling)	RACM	Friable	45 fittings
	Closet by Room 48	Insulation inside Wood Door	RACM	Friable	1 door
1	101A	Cementitious Fittings (pipe chase)	RACM	Friable	4 fittings
	103D	Cementitious Fittings (pipe chase)	RACM	Friable	4 fittings
	103F	Insulation inside Wood Door	RACM	Friable	1 door
	116B	Insulation inside Wood Door	RACM	Friable	1 door
2	Kitchen	Cementitious Fittings (pipe chase by stove)	RACM	Friable	1 fitting
	200F	Cementitious Fittings (above plaster ceiling)	RACM	Friable	25 fittings
	203	Cementitious Fittings (above plaster ceiling)	RACM	Friable	25 fittings
	Perimeter of Courtyard	Cementitious Fittings (pipe chases)	RACM	Friable	36 fittings
3	305	Cementitious Fittings (pipe chases)	RACM	Friable	4 fittings
	Restroom 306	Cementitious Fittings (pipe chases)	RACM	Friable	20 fittings
	Restrooms 308/309	Cementitious Fittings (pipe chases & above plaster ceiling)	RACM	Friable	70 fittings
	310	Insulation inside Wood Door	RACM	Friable	1 door
4	Restroom 403	Cementitious Fittings (pipe chases)	RACM	Friable	6 fittings
	Restroom 404	Cementitious Fittings (pipe chases)	RACM	Friable	24 fittings
5	501	Insulation inside Wood Door	RACM	Friable	1 door
6	Restrooms 600/602	Cementitious Fittings (pipe chases)	RACM	Friable	40 fittings
	601	Cementitious Fittings (above plaster ceiling)	RACM	Friable	2 fittings



— AN ATLAS COMPANY —

Asbestos Material Inventory Former IRS Building W. Fourth Street, Covington, KY					
Area No.	Room No.	Material Description and Location	NESHAP Category	Condition	Estimated Quantity
6 (cont.)	604	Insulation inside Wood Door	RACM	Friable	1 door
	604B	Insulation inside Wood Doors	RACM	Friable	2 doors
	606	Insulation inside Wood Door	RACM	Friable	1 door
7	700C	Insulation inside Wood Door	RACM	Friable	1 door
8	Restroom 810/811	Cementitious Fittings (pipe chases)	RACM	Friable	24 fittings
9	Open Area	Cementitious Fittings (pipe chase)	RACM	Friable	2 fittings
10	1002	Cementitious Fittings (above plaster ceiling)	RACM	Friable	15 fittings
	Restroom 1003/1005	Cementitious Fittings (pipe chases)	RACM	Friable	10 fittings
11	Open Area	Cementitious Fittings (pipe chases)	RACM	Friable	15 fittings
	1101	Insulation inside Wood Door	RACM	Friable	1 door
Canteen	Canteen	Cementitious Fittings (pipe chase)	RACM	Friable	2 fittings
12	Restroom B209	Cementitious Fittings (pipe chases)	RACM	Friable	30 fittings
	Restroom B211	Cementitious Fittings (pipe chases)	RACM	Friable	80 fittings
13	Restroom B302	Cementitious Fittings (pipe chases & above plaster ceiling)	RACM	Friable	100 fittings
	B315	Insulation inside Wood Door	RACM	Friable	2 doors
	Room by B315	Insulation inside Wood Door	RACM	Friable	1 door
	B313	Insulation inside Wood Door	RACM	Friable	1 door
	B313A	Insulation inside Wood Door	RACM	Friable	1 door
	B316	Insulation inside Wood Door	RACM	Friable	1 door
	B323B	Insulation inside Wood Door	RACM	Friable	1 door

Attachment E
**Regulated Materials and Universal
Waste Inventory**



REGULATED MATERIALS AND UNIVERSAL WASTE INVENTORY

Project Number: 241EN00753			Project Name: Former IRS Building, W. Fourth Street, Covington, KY					Inspector: Gerald H. Beaudion	
Client Name: Graydon Head & Ritchey, LLP			Client Address: 312 Walnut Street, Suite 1800, Cincinnati, Ohio 45202					Date: October 2020	
Location	Fluorescent Bulbs	Ballasts - associated with fluorescent fixtures (non-PCB unless noted)	HID Bulbs	Ballasts - associated with HID fixtures (potential PCB)	Mercury - associated with thermostats, gauges and equipment	Illuminated Exit Signs (potential tritium source)	Emergency Light Fixtures (potential lead batteries)	Smoke Detectors (radioactive source)	Other
Office Area									
Throughout Office Area	1,528	638	0	0	0	5	0	104	Refrigerated Water Coolers (4); Small Fluorescent Light Bulbs (18); Track Light Bulbs (4); Tornado Lights (7); Fire Extinguishers (3).
Area 1									
Mechanical Room 100	88	44	0	0	4 (boiler gauges)	1	0	6	Refrigerated Air Dryer (1); Containers of Corrosive Liquids and Powders (7); Fire Extinguishers (4); Air Compressor (1).
Mechanical Room 101	74	37	0	0	0	1	0	4	Chiller Systems (3); Air Handler (1); Container of Corrosive Liquid (1); Fire Extinguisher (1).
Room 101A	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulb (1).
Room 102	12	3	0	0	0	0	0	2	None
Room 103 (includes mezzanine area)	90 (plus 4 boxes of stored bulbs)	30	0	0	0	0	3	1 (plus 24 stored inside box)	Refrigerated Water Cooler (1); Air Handler (1); Drum of Propylene Glycol (1); Container of Denatured Alcohol (1); Containers of Roof Coatings (2); Fire Extinguishers (1).
Room 103A	4	2	0	0	0	0	0	1	None
Room 103B	6	2	0	0	0	0	0	1	None
Room 103BB	8	2	0	0	0	0	0	1	None
Room 103C	12	3	0	0	0	0	0	1	None
Room 103D	8	2	0	0	0	0	0	1	Tornado/Fire Lights (2)
Room 103E	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulbs (2); Fire Extinguisher (1).
Electrical Room 103F	24	12	0	0	0	0	0	2	Container of Extra Heavy Oil (1); Container of Solid Material (1); Fire Extinguishers (2); Incandescent Light Bulbs (3).

REGULATED MATERIALS AND UNIVERSAL WASTE INVENTORY

Project Number: 241EN00753			Project Name: Former IRS Building, W. Fourth Street, Covington, KY					Inspector: Gerald H. Beaudion	
Client Name: Graydon Head & Ritchey, LLP			Client Address: 312 Walnut Street, Suite 1800, Cincinnati, Ohio 45202					Date: October 2020	
Location	Fluorescent Bulbs	Ballasts - associated with fluorescent fixtures (non-PCB unless noted)	HID Bulbs	Ballasts - associated with HID fixtures (potential PCB)	Mercury - associated with thermostats, gauges and equipment	Illuminated Exit Signs (potential tritium source)	Emergency Light Fixtures (potential lead batteries)	Smoke Detectors (radioactive source)	Other
Area 1 (cont.)									
Emergency Generator Room 103F	8	4	0	0	0	0	1	1	Emergency Generator Batteries (2); Air Compressor (1); Container of BioGuard Fuel Microbicide (1); Bag of Dry Absorbent (1); Fire Extinguisher (1).
Room 111	48	16	0	0	0	0	0	3	None
Mechanical Room 116	28	14	0	0	4 (thermostat)	0	0	2	Air Handler (1); Air Compressor (1); Container of Lubricant (1); Fire Extinguisher (1).
Mechanical Room 116A	6	6	0	0	0	0	0	2	Air Handler (1); Air Compressor (1).
Room 116B	6	6	0	0	0	0	0	1	None
Room 117	8	2	0	0	0	0	0	1	None
Electrical Room 117A	4	2	0	0	0	0	0	1	None
Room 118	62	22	0	0	0	0	1	7	Air Handler (1); Air Compressor (1).
Large Open Room	1,011	337	0	0	0	8	0	23	Large Air Conditioning Units (2); Tornado/Fire Lights (4); Fire Extinguishers (3).
Area 1 Hallways	129 (plus 9 boxes of stored bulbs)	35 (plus 7 stored inside box)	0	0	0	8	0	18	Refrigerated Water Cooler (1); Tornado/Fire Lights (2); Fire Extinguisher (1).
Area 2									
Kitchen Area	106	64	0	0	0	2	0	7	Walk-In Freezers (3); Wet Fire Suppression System (1); Small Fluorescent Light Bulbs (3); Fire Extinguisher (1); Incandescent Light Bulbs (5).
Room 200	80	29	0	0	0	3	1	10	Small Fluorescent Light Bulbs (1); Fire Extinguisher (1).
Room 201/203	45	7 (plus 12 ballasts that are not marked - Potential PCBs)	0	0	0	0	0	6	Window Air Conditioning Unit (1).

REGULATED MATERIALS AND UNIVERSAL WASTE INVENTORY

Project Number: 241EN00753			Project Name: Former IRS Building, W. Fourth Street, Covington, KY					Inspector: Gerald H. Beaudion	
Client Name: Graydon Head & Ritchey, LLP			Client Address: 312 Walnut Street, Suite 1800, Cincinnati, Ohio 45202					Date: October 2020	
Location	Fluorescent Bulbs	Ballasts - associated with fluorescent fixtures (non-PCB unless noted)	HID Bulbs	Ballasts - associated with HID fixtures (potential PCB)	Mercury - associated with thermostats, gauges and equipment	Illuminated Exit Signs (potential tritium source)	Emergency Light Fixtures (potential lead batteries)	Smoke Detectors (radioactive source)	Other
Area 2 (cont.)									
Mechanical Room 200F	22	11	0	0	0	0	0	1	Air Handler (1); Fire Extinguisher (1).
Dining/Stage Area	174	66	0	0	0	2	0	13	Refrigerated Water Cooler (1); Large Dome Light Bulbs (15); Small Fluorescent Light Bulbs (24); Tornado Lights (2).
Area 3									
Large Open Area	1,068	278	0	0	0	5	0	46	Refrigerated Water Coolers (2); Tornado Lights (5); Fire Extinguishers (2).
Room 300A	8	2	0	0	0	0	0	1	None
Room 300B	8	2	0	0	0	0	0	1	None
Room 300C	8	2	0	0	0	0	0	1	None
Room 300D	8	2	0	0	0	0	0	1	None
Mechanical Room 300F	16	8	0	0	0	0	0	2	Air Handler (1); Fire Extinguisher (1).
Room 300G	16	4	0	0	0	0	0	1	Fire Extinguisher (1).
Room 302	8	2	0	0	0	0	0	1	None
Mechanical Room 303	18	9	0	0	0	0	0	2	Air Handlers (2); Fire Extinguisher (1).
Room 304	2	1	0	0	0	0	0	1	None
Room 305	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulb (1).
Restroom 306	31	15	0	0	0	0	0	1	Tornado Light (1).
Room 307	24	8	0	0	0	0	0	3	None
Room 307C/D	18	6	0	0	0	0	0	2	None

REGULATED MATERIALS AND UNIVERSAL WASTE INVENTORY

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Area 3 (cont.)									
Restroom 308	6	3	0	0	0	0	0	1	Small Fluorescent Light Bulbs (2); Tornado Light (1).
Restroom 309	40	16	0	0	0	0	0	2	Small Fluorescent Light Bulbs (12); Tornado Light (1).
Electrical Room 310	8	8	0	0	0	0	0	1	None
Mechanical Room 311	6	6	0	0	0	0	0	1	Air Handler (1).
Area 4									
Large Open Area	864	216	0	0	0	5	0	23	Large Air Conditioning Units (4); Refrigerated Water Coolers (3); Tornado Lights (2); Fire Extinguishers (4).
Room 400	2	1	0	0	0	0	0	1	None
Room 401	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulb (1).
Mechanical Room 402	28	14	0	0	0	0	0	2	Air Handler (1); Fire Extinguisher (1).
Restroom 403	4	2	0	0	0	0	0	1	Small Fluorescent Light Bulbs (4); Tornado Light (1).
Restroom 404	44	21	0	0	0	0	0	2	Tornado Light (1).
Room 405	16	4	0	0	0	0	0	1	None
Room 406	16	4	0	0	0	0	0	1	None
Room 407	2	1	0	0	0	0	0	1	None
Room 408	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulb (1).
Mechanical Room 409	20	10	0	0	0	0	0	3	Air Handler (1); Fire Extinguisher (1).



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Area 5									
Large Open Area	720	180	0	0	0	5	0	23	Tornado Lights (2); Fire Extinguishers (3).
Room 501	10	10	0	0	0	0	0	2	None
Mechanical Room 502	10	10	0	0	0	0	0	2	Air Handler (1).
Area 6									
Restroom 600	56	28	0	0	0	0	0	3	Tornado Light (1).
Room 601	0	0	0	0	0	0	0	0	Containers of Office Cleaners (2).
Restroom 602	12	6	0	0	0	0	0	1	Small Fluorescent Light Bulbs (10); Tornado Light (1).
Mechanical Room 502	10	10	0	0	0	0	0	2	Air Handler (1).
Room 603	510	170	0	0	0	6	0	19	Large Air Conditioning Units (4); Refrigerated Water Cooler (1); Tornado Lights (2); Fire Extinguishers (4).
Room 603A	12	4	0	0	0	0	0	1	None
Room 603C	6	6	0	0	0	0	0	1	None
Room 604	147	49	0	0	0	1	0	19	Large Air Conditioning Units (3); Tornado Light (1).
Mechanical Room 604B	44	23	0	0	0	0	0	4	Air Handlers (3); Fire Extinguishers (2).
Mechanical Room 605	12	12	0	0	0	0	0	2	Air Handler (1).
Room 606	6	6	0	0	0	0	0	1	None
Area 6 Hallways	32	8	0	0	0	0	0	6	Refrigerated Water Cooler (1).

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Area 7									
Large Open Area	1,099	386	0	0	0	8	0	3	Refrigerated Water Cooler (1); Tornado/Caution Lights (7); Fire Extinguishers (3).
Mechanical Room 700E	92	46	0	0	0	0	0	8	Air Handlers (2); Fire Extinguishers (2); Container of Drywall Mud (1).
Room 700C/D	24	15	0	0	0	0	0	2	Fire Extinguishers (2).
Restroom 700H	20	10	0	0	0	0	0	1	Tornado Light (1).
Restroom 700I	6	3	0	0	0	0	0	1	Small Fluorescent Light Bulbs (4); Tornado Light (1).
Mechanical Room 700J	8	2	0	0	0	0	0	1	Refrigerated Air Dryers (2); Air Compressors (2).
Room 700K	216	54	0	0	0	0	0	7	Large Air Conditioning Units (2); Tornado/Caution Lights (2); Fire Extinguisher (1).
Room 700L	16	4	0	0	1 (thermostat)	0	0	1	None
Area 8									
Dock Area	50	20	0	0	0	0	0	3	Through Wall Air Conditioning Unit (1); Caution Light (1); Fire Extinguishers (49).
Open Areas/Hallways	194	87	0	0	0	0	0	14	Refrigerated Water Cooler (1); Tornado/Caution Lights (3).
Room 801	4	2	0	0	0	0	0	1	None
Mechanical Room 802	4	2	0	0	0	0	0	14	None
Room 803A/B	32	8	0	0	2 (thermostat)	0	0	3	Air Conditioning Units (2).
Room 804	12	6	0	0	0	0	0	1	Air Conditioning Unit (1).
Room 805	8	2	0	0	0	0	0	1	None

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Area 8 (cont.)									
Room 806	4	2	0	0	0	0	0	1	None
Room 807	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulbs (2).
Room 808	24	12	0	0	0	0	0	1	None
Room 809	16	8	0	0	0	0	0	1	Containers of Office Cleaners (2).
Restroom 810	10	5	0	0	0	0	0	2	Tornado Light (1).
Restroom 811	9	4	0	0	0	0	0	2	Tornado Light (1).
Room 812A	0	0	0	0	0	0	0	1	Small Fluorescent Light Bulb (1).
Room 813	10	5	0	0	0	0	0	1	None
Room 814	24	6	0	0	0	0	0	1	None
Room 815/A	64	16	0	0	0	1	0	3	Containers of Office Cleaners (6).
Room 816	8	4	0	0	0	0	0	1	None
Room 817 (Overhead Door Area)	28	14	0	0	0	0	0	1	Multiple Bags of Ice Melt
Room 817 (Large Open Room)	224	56	0	0	0	3	0	9	Tornado/Fire Lights (2); Fire Extinguishers (2).
Room 817A	8	2	0	0	0	0	0	1	None
Room 817C	68	17	0	0	0	2	0	2	Tornado/Caution Lights (2).
Mezzanine Mechanical Space	124	62	0	0	0	0	0	8	Air Handlers (2); Air Compressor (1).

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Area 9									
Large Open Area	580	145	0	0	0	2	0	18	Tornado Lights (3); Fire Extinguisher (1).
Mechanical Room 902E	6	6	0	0	0	0	0	1	Air Handler (1).
Room 902F	6	6	0	0	0	0	0	1	None
Room 902G	12	3	0	0	0	0	0	1	None
Room 903	256	64	0	0	0	2	0	33	Large Air Conditioning Units (3); Tornado/Fire Lights (2); Fire Extinguishers (2).
Area 10									
Large Open Area	924	231	0	0	0	1	0	32	Refrigerated Water Cooler (1); Tornado Lights (2); Fire Extinguisher (1).
Mechanical Room 1002	40	16	0	0	0	0	0	4	Air Handlers (3); Fire Extinguishers (2).
Restroom 1003	76	38	0	0	0	0	0	3	Small Fluorescent Light Bulbs (14); Tornado Light (1).
Restroom 1005	16	8	0	0	0	0	0	1	Small Fluorescent Light Bulbs (4); Tornado Light (1).
Custodian Closet by Restrooms	2	1	0	0	0	0	0	1	None
Area 11									
Large Open Area	788	197	0	0	0	1	0	25	Large Air Conditioning Units (2); Tornado Light (1); Fire Extinguishers (2).
Room 1101	8	8	0	0	0	0	0	1	Fire Extinguisher (1).
Mechanical Room 1102	10	10	0	0	0	0	0	3	Air Handler (1).

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Canteen/Breezeway Area									
Canteen	26	13	0	0	0	0	0	1	Walk-In Freezer (1); Fire Extinguisher (1).
Breezeway	82	29	0	0	0	4	0	11	Fire Extinguisher (1).
Mechanical Room 1102	10	10	0	0	0	0	0	3	Air Handler (1).
Area 12									
Large Open Area	1,564	391	0	0	0	9	0	50	Refrigerated Water Coolers (4); Tornado Lights (5); Fire Extinguishers (8).
Electrical Room B100	16	16	0	0	0	0	0	1	Fire Extinguishers (2).
Mechanical Room B101	32	32	0	0	0	0	0	4	Air Handlers (2); Fire Extinguisher (1); Light Bulbs inside Air Handler (8)
Room B102	16	4	0	0	0	0	0	1	None
Room B103	16	4	0	0	0	0	0	2	None
Room B104	8	2	0	0	0	0	0	1	None
Mechanical Room B105	18	18	0	0	0	0	0	2	Air Handler (1).
Room B200A	88	22	0	0	0	0	0	2	Fire Extinguisher (1).
Room B200B	8	2	0	0	0	0	0	1	None
Room B201	24	6	0	0	0	0	0	1	None
Room B201A	12	6	0	0	0	0	0	1	None
Room B201B	14	6	0	0	0	0	0	1	None

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Area 12 (cont.)									
Room B201C	111	37	0	0	0	2	0	15	Large Air Conditioning Units (4); Fire Extinguishers (2).
Room B203	96	24	0	0	0	1	0	2	Tornado Light (1); Fire Extinguisher (1).
Electrical Room B204	4	4	0	0	0	0	0	1	None
Room B204A	24	6	0	0	0	0	0	1	None
Room B211	64	32	0	0	0	0	0	3	Small Fluorescent Light Bulbs (8); Tornado Light (1).
Mechanical Room B212	12	6	0	0	0	0	0	3	Air Handler (1); Fire Extinguisher (1).
Area 13									
Room B300	4	4	0	0	0	0	0	1	None
Room B301	2	2	0	0	0	0	0	1	None
Restroom B302	76	38	0	0	0	0	0	8	Tornado Light (1).
Room B303	2	2	0	0	0	0	0	1	None
Mechanical Room B304	70	58	0	0	0	0	0	1	Air Handlers (3); Fire Extinguishers (2).
Mechanical Room B307	24	24	0	0	0	0	0	2	Air Handler (1); Fire Extinguisher (1).
Room B308	12	9	0	0	0	0	0	1	Fire Extinguisher (1).
Electrical Room B308A	8	8	0	0	0	0	0	1	Fire Extinguisher (1).
Room B313	228	162	0	0	0	11	0	1	Tornado Light (1); Fire Extinguishers (4).
Room B313A	69	23	0	0	0	1	0	13	Large Air Conditioning Units (2); Tornado Light (1).

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Area 13 (cont.)									
Hallway by B313A	52	13	0	0	0	0	0	5	Fire Extinguisher (1).
Room B314	200	100	0	0	0	2	0	34	Large Air Conditioning Units (3); Fire Suppression System; Lead-Acid Battery Inside Case (1); Fire/Caution/Tornado Lights (11).
Room South of B314	104	30	0	0	0	1	0	14	Large Air Conditioning Units (4).
Room B315	172	43	0	0	0	1	0	24	Large Air Conditioning Units (3); Tornado Light (1).
Room South of B315	108	27	0	0	0	1	0	4	Large Air Conditioning Unit (1).
Room B317	80	20	0	0	0	0	0	9	Large Air Conditioning Unit (1); Fire/Caution/Tornado Lights (3).
Area 14									
Large Open Areas (2)	468	127	0	0	0	2	0	13	Refrigerated Water Cooler (1); Tornado Lights (3); Fire Extinguishers (4).
Room B305	8	2	0	0	0	0	0	1	None
Room B305A	12	3	0	0	0	0	0	1	None
Room B314	200	100	0	0	0	2	0	34	Large Air Conditioning Units (3); Fire Suppression System; Lead-Acid Battery (1); Fire/Caution/Tornado Lights (11).
Room B306	8	2	0	0	0	0	0	1	None
Room B319	8	2	0	0	0	0	0	0	None
Room B320	12	3	0	0	0	0	0	0	None
Room B323B	6	6	0	0	0	0	0	1	None
Electrical Room B323C	4	2	0	0	0	0	0	1	None

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Central Plant									
Interior Spaces	140	132	0	0	0	0	0	13	Chiller Systems (2); Refrigerated Water Cooler (1); Through Wall Air Conditioner (1); Lead-Acid Batteries Inside Fire Detection Control Panel (2); Containers of Corrosive Liquid (2); Caution Lights (2); Fire Extinguishers (3).
Room B305	8	2	0	0	0	0	0	1	None
Room B305A	12	3	0	0	0	0	0	1	None
Exterior of Buildings and Grounds (Site Wide)									
Building Mounted Fixtures	28	28	25	25	0	0	0	0	Small Fluorescent Light Bulbs (14); Spotlight bulbs (32).
North Guard Shack by Gate	6	4	0	0	0	0	0	0	Through Wall Air Conditioner (1).
South Guard Shack by Gate	2	1	0	0	0	0	0	0	Through Wall Air Conditioner (1).
West Guard Shack by Gate	6	4	0	0	0	0	0	0	Through Wall Air Conditioner (1).
North Shack Inside Fence Line	2	1	0	0	0	0	0	0	Through Wall Air Conditioner (1); Spot Lights (3).
Pole Mounted Light Fixtures	0	0	36	36	0	0	0	0	None
Cooling Tower Areas (2)	0	0	0	0	0	0	0	0	None