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COMPREHENSIVE ASBESTOSLEAD-BASED PAINT SURVEY

Cross Island Parkway Toll Plaza/Tunnel
4 Marshland Drive
Hilton Head, SC 29926

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EXECUTIVE SUMMARY

The comprehensive asbestos survey performed by Trident Environmental Services, Inc. of the Cross Island Parkway Toll Plaza/Tunnel located at 4 Marshland Drive in Hilton Head, South Carolina **did not** identify the presence of asbestos containing materials (ACM). The following table lists the asbestos identified at the referenced site.

Asbestos

Description	Type
NO ASBESTOS DETECTED	

RACM – Regulated Asbestos Containing Material

*PACM – Presumed Asbestos Containing Material

Abatement of the identified ACM should be performed by a properly trained and licensed abatement contractor prior to the planned renovation/demolition activities.

BACKGROUND

Trident Environmental Services, Inc. was contracted by **ESP Associates** to perform a comprehensive asbestos survey Cross Island Parkway Toll Plaza/Tunnel in Hilton Head, South Carolina. This survey was performed in order to satisfy the NESHAP requirements for future demolition of the toll plaza facility. Our scope of work included the toll booths/associated components, canopy, and an underground tunnel leading to the toll booths. The administration building was not included.

Non-suspect material includes wood, glass, concrete or concrete block, brick, masonry or grout, natural stone or ceramic, metal components, ductwork or piping, PVC pipes, fiberglass, foam or rubber insulation.

Asbestos

The inspection was conducted to identify asbestos that may be disturbed during the demolition activities. The identification of asbestos will aid in the prevention of occupational exposures and/or environmental releases of airborne asbestos fibers. Identification of ACM complies with Title 40 Code of the Federal Regulations (CFR), Part 61, South Carolina Department of Health and Environmental Control (SCDHEC) Regulation 61-86.1, and Title 29 CFR, Part 1926 enforced by the Occupational Safety and Hazard Administration (OSHA). The Asbestos Survey describes the investigative procedures utilized, results of the suspect ACM sampled/analyzed, and recommendations regarding the structures as related to asbestos.

Limitations

There is a possibility that suspect materials may be located in areas that are inaccessible during the inspection. These areas include but not limited to the following: walls, voids, chases, above ceilings, or areas where building components obstruct views, where there are operational mechanical/electrical/HVAC systems, under platforms, slabs, foundations, inside attics or crawlspaces, under multiple layers of flooring/floor systems and roofing. When additional un-sampled suspect ACM are discovered during renovation or demolition activities, work shall immediately stop until receipt of laboratory results confirming the material is non asbestos.

ASBESTOS SURVEY

Asbestos Investigative Procedures

It is our understanding that the subject structure is scheduled for demolition in the near future. The asbestos survey was performed by observing and sampling suspect building materials. Significant destructive testing was not utilized during the inspection. There is a possibility that suspect materials exist in inaccessible areas such as wall cavities and pipe chases. If any additional suspect ACM are discovered during the course of demolition activities, bulk samples should be extracted to identify the presence, or absence, of asbestos prior to continuation of work activities.

Visual Inspection

The survey began with a visual observation of building and/or structure components to identify homogeneous areas of suspect ACM. A homogeneous area consists of building materials, which appear similar throughout in terms of color, texture and date of application. Building materials not identified as concrete, glass, wood, masonry, metal, rubber, foam or plastic were not considered ACM. A sampling strategy was developed to provide representative samples for analysis. Samples were then extracted from a variety of suspect ACM.

Laboratory & Analysis

Bulk samples collected were recorded on a Chain-of-Custody record and submitted to Electron Microscopy Services Laboratory Analytical, Inc. (EMSL) a Polarized Light Microscopy (PLM) laboratory. The laboratory is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP), administered by the National Institute of Standards and Technology (NIST). EMSL is accredited by NVLAP for the analysis of bulk asbestos by PLM and Transmission Electron Microscopy (TEM) ([NVLAP Lab Code: 200841-0](#)). Non-Friable Organically Bound (NOB) samples were analyzed by TEM.

The suspect materials were analyzed by trained microscopists utilizing PLM techniques coupled with dispersion staining in accordance with EPA Test Method Title 40 CFR Regulations, Chapter I (1-1-87 edition), Part 763, Subpart F- Appendix A. This method identifies asbestos mineral fibers based on six optical characteristics: morphology, birefringence, refractive index, extinction angle, sign of elongation and dispersion staining colors. The laboratory analysis reports the specific type of asbestos identified (there are six asbestos minerals) and the percentage of asbestos present. The EPA and SCDHEC defines materials as asbestos containing if an asbestos content of greater than one percent (>1%) is detected in a representative sample. OSHA considered a material with any content of asbestos as an ACM.

The State requires NOB materials with negative or trace results by PLM to be analyzed by at least one TEM. SCDHEC in accordance with ASTM E 2356-04 defines NOB materials as “materials that are not friable and that consist of fibers and other particulate matter embedded in a solid matrix of asphalt, vinyl or other organic substances.” Examples of NOB materials include but are not limited to flooring materials such as vinyl floor tiles, vinyl sheet flooring, adhesives, mastics, asphalt shingles, roofing materials, glazing, caulks, and cove base.

Asbestos Classifications & Categories

The EPA classifies ACM into two categories, friable and non-friable. A friable material creates a greater health hazard due to the fact that it may be “crumbled, pulverized or reduced to powder by the forces expected to act upon it in the course of demolition or renovation operations.”

Friable Asbestos material means any material containing more than one percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763 section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure. If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM.

Category I Non Friable Asbestos-Containing Material (ACM) means asbestos-containing packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than one percent asbestos as determined using the method specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy.

Category II Non Friable ACM means any material, excluding Category I non friable ACM, containing more than one percent asbestos as determined using the methods specified in appendix A, subpart F, 40 CFR part 763, section 1, Polarized Light Microscopy that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure. (cement siding, transite board shingles, etc.)

Regulated Asbestos-Containing Material (RACM) means (a) Friable asbestos material, (b) Category I non friable ACM that has become friable, (c) Category I non friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II non friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

The following section summarizes the sample numbers, locations, type material, asbestos type, percent of asbestos detected, present condition of the asbestos containing material, potential for disturbance, and hazard assessment ratings. The asbestos sample laboratory analyses and chain of custody records are included at the end of this report.

Asbestos Abbreviations and Hazard Assessment Key

The EPA and SCDHEC require that confirmed ACM is given a hazard assessment based on its present condition and potential for future disturbance. This hazard assessment is used as a tool for prioritization in future remedial actions regarding the ACM. The following key demonstrates the criteria that make up the hazard assessment.

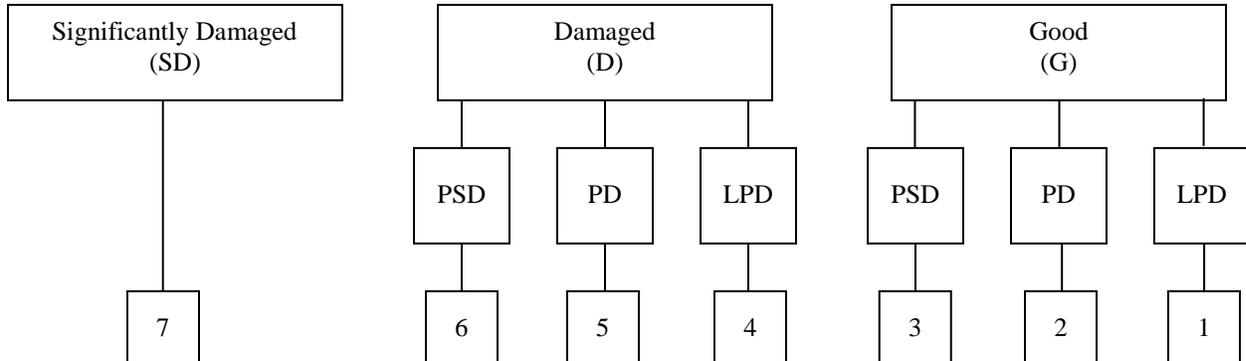
Present Condition

F = Friable
NF = Non-friable
G = Good (very localized limited damage)
D = Damaged (<10% distributed and/or <25% localized)
S = Significantly Damaged (\geq 10% distributed and/or 25% localized)

Potential for Future Disturbance

LPD = Low Potential for Disturbance (Contact, Vibration, and/or Air Erosion – low concern)
PD = Potential for Damage (Contact, Vibration, and/or Air Erosion – moderate concern)
PSD = Potential for Significant Damage (Contact, Vibration and/or Air Erosion – high concern)

Hazard Assessment



ASBESTOS SUMMARY

DESCRIPTION	TYPE	LOCATION	ESTIMATED QUANTITY
NO ASBESTOS DETECTED			

RACM – Regulated Asbestos Containing Material

*PACM – Presumed Asbestos Containing Material

HOMOGENOUS AREA ESTIMATED QUANTITY TABLE

HOMOGENOUS AREA ID #	DESCRIPTION	ESTIMATED QUANTITY
01	HVAC Duct Sealant (lt. gray)	1,200 LF
02	HVAC Duct Sealant (dk. gray)	800 LF
03	Road Expansion Joint	10 SF
04	Toll Booth Base Mastic (gray)	140 SF
05	Rolled Roofing	3,500 SF
06	Roof Tar	3,500 SF
07	Roof Drain	250 SF
08	Roof Insulation	3,500 SF
09	Insulation Membrane	3,500 SF
10	Roof Caulk (tan)	20 SF
11	Roof Caulk (white)	40 SF
12	Stucco (duplicate samples, see HA 15)	See HA 15
13	Caulk (white)	10 SF
14	Plaster	3,500 SF
15	Stucco	2,100 SF

ASBESTOS SAMPLE DATA TABLE

DESCRIPTION OF EACH SAMPLE AREA				LABORATORY		ASSESSMENT OF MATERIALS	
Homogeneous Area & Sample ID	Description	Unit # / Room	Friable (Y/N)	Asbestos Present		Condition Assessment Category	Hazard Assessment Category
				Percent	Asbestos		
01-01	HVAC Duct Sealant (lt. gray)	Tunnel	N	0.0%	ND	7	N/A
01-02	HVAC Duct Sealant (lt. gray)	Tunnel	N	0.0%	ND	7	N/A
01-03 T	HVAC Duct Sealant (lt. gray)	Tunnel	N	0.0%	ND	7	N/A
02-04	HVAC Duct Sealant (dk. gray)	Tunnel	N	0.0%	ND	7	N/A
02-05	HVAC Duct Sealant (dk. gray)	Tunnel	N	0.0%	ND	7	N/A
02-06 T	HVAC Duct Sealant (dk. gray)	Tunnel	N	0.0%	ND	7	N/A
03-07	Road Expansion Joint	Roadway	N	0.0%	ND	7	N/A
03-08	Road Expansion Joint	Roadway	N	0.0%	ND	7	N/A
03-09 T	Road Expansion Joint	Roadway	N	0.0%	ND	7	N/A
04-10	Toll Booth Base Mastic (gray)	Toll Booth	N	0.0%	ND	7	N/A
04-11	Toll Booth Base Mastic (gray)	Toll Booth	N	0.0%	ND	7	N/A
04-12 T	Toll Booth Base Mastic (gray)	Toll Booth	N	0.0%	ND	7	N/A
05-13	Rolled Roofing	Toll Plaza Roof	N	0.0%	ND	7	N/A
05-14	Rolled Roofing	Toll Plaza Roof	N	0.0%	ND	7	N/A
05-15 T	Rolled Roofing	Toll Plaza Roof	N	0.0%	ND	7	N/A
06-16	Roof Tar	Toll Plaza Roof	N	0.0%	ND	7	N/A
06-17	Roof Tar	Toll Plaza Roof	N	0.0%	ND	7	N/A
06-18 T	Roof Tar	Toll Plaza Roof	N	0.0%	ND	7	N/A
07-19	Roof Drain	Toll Plaza Roof	N	0.0%	ND	7	N/A
07-20	Roof Drain	Toll Plaza Roof	N	0.0%	ND	7	N/A
07-21 T	Roof Drain	Toll Plaza Roof	N	0.0%	ND	7	N/A
08-22	Roof Insulation	Toll Plaza Roof	Y	0.0%	ND	1	N/A
08-23	Roof Insulation	Toll Plaza Roof	Y	0.0%	ND	1	N/A
08-24	Roof Insulation	Toll Plaza Roof	Y	0.0%	ND	1	N/A
09-25	Insulation Membrane	Toll Plaza Roof	N	0.0%	ND	7	N/A
09-26	Insulation Membrane	Toll Plaza Roof	N	0.0%	ND	7	N/A
09-27 T	Insulation Membrane	Toll Plaza Roof	N	0.0%	ND	7	N/A
10-28	Roof Caulk (tan)	Toll Plaza Roof	N	0.0%	ND	7	N/A
10-29	Roof Caulk (tan)	Toll Plaza Roof	N	0.0%	ND	7	N/A
10-30 T	Roof Caulk (tan)	Toll Plaza Roof	N	0.0%	ND	7	N/A
11-31	Roof Caulk (white)	Roof Penthouse	N	0.0%	ND	7	N/A

ASBESTOS SAMPLE DATA TABLE

DESCRIPTION OF EACH SAMPLE AREA				LABORATORY		ASSESSMENT OF MATERIALS	
Homogeneous Area & Sample ID	Description	Unit # / Room	Friable (Y/N)	Asbestos Present		Condition Assessment Category	Hazard Assessment Category
				Percent	Asbestos		
11-32	Roof Caulk (white)	Roof Penthouse	N	0.0%	ND	7	N/A
11-33 T	Roof Caulk (white)	Roof Penthouse	N	0.0%	ND	7	N/A
12-34	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-35	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-36	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-37	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-38	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-39	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
12-40	Stucco	Toll Plaza	Y	Duplicate Sample, SE HA 15			
13-41	Caulk (white)	Roadway Tunnel Wall	N	0.0%	ND	7	N/A
13-42	Caulk (white)	Roadway Tunnel Wall	N	0.0%	ND	7	N/A
13-43 T	Caulk (white)	Roadway Tunnel Wall	N	0.0%	ND	7	N/A
14-44	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-45	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-46	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-47	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-48	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-49	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
14-50	Plaster	Toll Plaza Underside	Y	0.0%	ND	4	N/A
15-51	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-52	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-53	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-54	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-55	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-56	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A
15-57	Stucco	Toll Plaza	Y	0.0%	ND	4	N/A

Assessment Categories

- | | |
|--|---|
| (1) Thermal Systems Insulation – Good Condition | (5) Surfacing – Damaged |
| (2) Thermal Systems Insulation – Damaged | (6) Surfacing – Significantly Damaged |
| (3) Thermal Systems Insulation – Significantly Damaged | (7) Miscellaneous – Good Condition |
| (4) Surfacing – Good Condition | (8) Miscellaneous – Damaged |
| | (9) Miscellaneous – Significantly Damaged |

Asbestos Present

- | | |
|----------------------|--------------------------|
| AMOS – Amosite | ACTI – Actinolite |
| CHRY – Chrysotile | ND – None Detected |
| CROC – Crocidolite | NT – Not Tested |
| ANTH – Anthophyllite | PACM – Presumed ACM |
| TREM – Tremolite | Asbestos Detected |

CONCLUSIONS/RECOMMENDATIONS

Conclusions

The comprehensive asbestos survey performed by Trident Environmental o of the Cross Island Parkway Toll Plaza/Tunnel located at 4 Marshland Drive in Hilton Head, South Carolina **did not** identify the presence of asbestos. Renovation or demolition activities that will disturb the ACM require removal per state and federal regulations. Asbestos materials can become hazardous when, due to damage, disturbance, or deterioration over time, they release asbestos fibers into the air of the building. All areas that contain asbestos should be utilized in a controlled manner to reduce the potential for disturbance. OSHA requires notification to all trades/contractors about the condition of the ACM to prevent possible occupational exposures.

Recommendations

Based on the findings of the survey, no abatement is required. Obtain a demolition permit from SCDHEC Asbestos Section prior to demolition for each structure. Keep a copy of the asbestos inspection report on site during renovation and/or demolition activities.

REGULATORY REQUIREMENTS

Demolitions

Demolition activities in public and commercial buildings are regulated by OSHA, EPA, and SCDHEC in compliance with CFR Part 61, subpart M, Final Rule (NESHAP) and SCDHEC Regulation 61-86.1. Demolition is defined as the wrecking or taking out any load-supporting structural member. These regulations require the proper removal and disposal of ACM that is affected by renovation or demolition. Demolition of the subject structures will require written notification, proper transportation, and disposal per state and federal regulations.

SCDHEC Asbestos Section requires the following prior to demolitions of each structure:

- Submit an electronic or written demolition project license application for each separate structure/facility that includes all information required on the application form and a \$50.00 fee (payable to SCDHEC) at least **10 working days prior to the start date**. A copy of the asbestos survey report (no older than 3 years) must accompany the application.
- Obtain an asbestos demolition license for each structure/facility, regardless of whether the required building inspection indicates the presence of ACM and prior to demolition activities.

For additional information concerning regulatory requirements, contact our office or visit the SCDHEC web site at <http://www.scdhec.gov/environment/baq/asbestos>

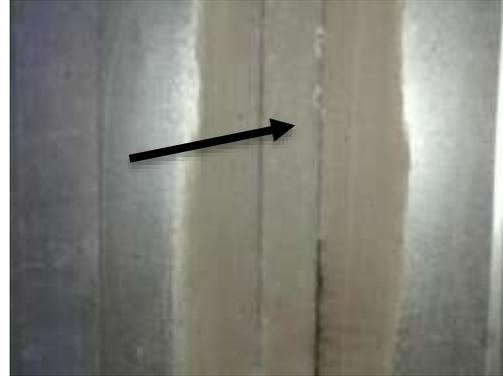
OSHA

OSHA considers a material with any content of asbestos as an ACM. The OSHA construction standard 29 CFR 1926.1101 covers construction, alteration, repair, maintenance, or renovation and demolition of structures containing asbestos. Employers are required to notify affected employees and contractors of the presence and location of asbestos-containing materials and test results (see OSHA3507 Fact Sheet for additional requirements).

PHOTOGRAPHS



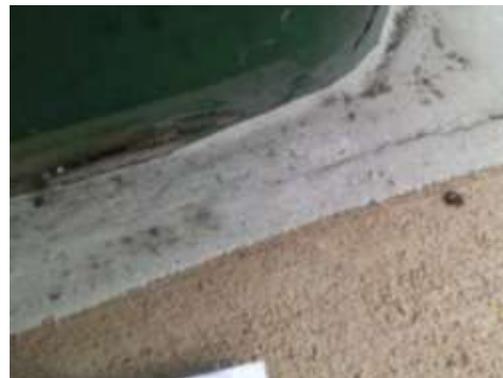
HOMOGENEOUS AREA 01
HVAC DUCK SEALANT (LT. GRAY)



HOMOGENEOUS AREA 02
HVAC DUCT SEALANT (DK. GRAY)



HOMOGENEOUS AREA 03
ROAD EXPANSION JOINT



HOMOGENEOUS AREA 04
TOLL BOOTH BASE MASTIC (GRAY)



HOMOGENEOUS AREA 05
ROLLED ROOFING



HOMOGENEOUS AREA 06
ROOF TAR

PHOTOGRAPHS



HOMOGENEOUS AREAS 07
ROOF DRAIN



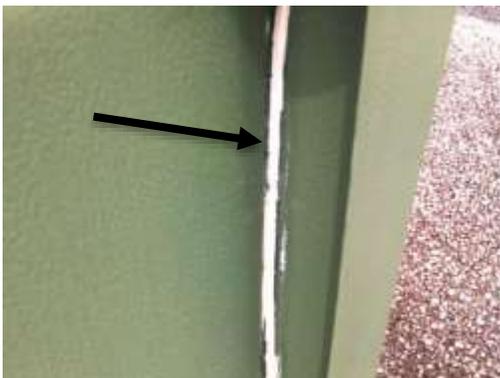
HOMOGENEOUS AREA 08
ROOF INSULATION



HOMOGENEOUS AREA 09
ROOF INSULATION MEMBRANE



HOMOGENEOUS AREA 10
ROOF CAULK (TAN)



HOMOGENEOUS AREA 11
ROOF CAULK (WHITE)



HOMOGENEOUS AREA 12
STUCCO (DUPLICATE SAMPLE, SEE HA 15)

PHOTOGRAPHS



HOMOGENEOUS AREA 13
TUNNEL WALL CAULK (GRAY)



HOMOGENEOUS AREA 14
PLASTER



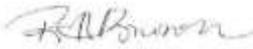
HOMOGENEOUS AREA 15
STUCCO

INSPECTOR ACCREDITATION

Inspection Date: 09/01/2021

Preparation Date: 09/12/2021

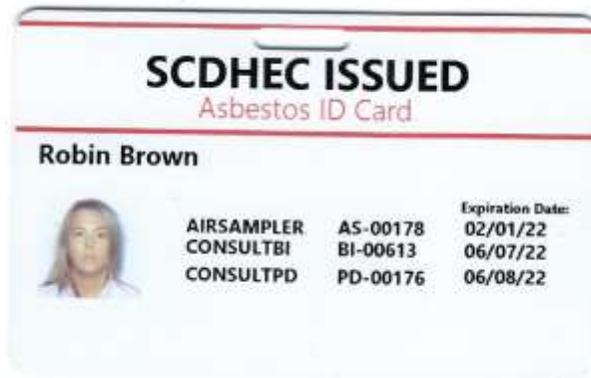
Prepared By:



:

Robin A. Brown

S.C. Inspector License BI – 00613

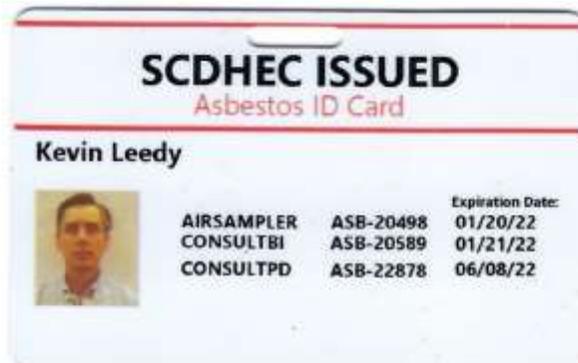


Inspected By:



Kevin E Leedy

S.C. Inspector License ASB – 20589



United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200841-0

EMSL Analytical, Inc.
Pineville, NC

is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:

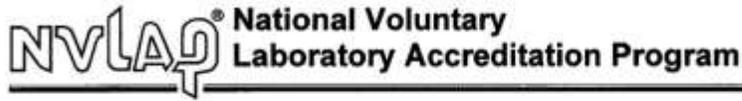
Asbestos Fiber Analysis

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).*



Arthur S. Lamm
For the National Voluntary Laboratory Accreditation Program

2021-07-01 through 2022-06-30
Effective Dates



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2017

EMSL Analytical, Inc.
10801 Southern Loop Blvd.
Pineville, NC 28134
Mr. Lee Plumley
Phone: 704-525-2205 Fax: 704-525-2382
Email: lplumley@emsl.com
<http://www.emsl.com>

ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 200841-0

Bulk Asbestos Analysis

<u>Code</u>	<u>Description</u>
18/A01	EPA – 40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

Airborne Asbestos Analysis

<u>Code</u>	<u>Description</u>
18/A02	U.S. EPA's "Interim Transmission Electron Microscopy Analytical Methods-Mandatory and Nonmandatory-and Mandatory Section to Determine Completion of Response Actions" as found in 40 CFR, Part 763, Subpart E, Appendix A.

For the National Voluntary Laboratory Accreditation Program

Order ID: 412107901		Asbestos Bulk Building Materials - Chain of Custody		EMSL Analytical, Inc. 10801 Southern Loop Blvd Pinetree, NC 28134 PHONE: (704) 525-2205 EMAIL: chaincust@EMSL.com	
		EMSL Order Number / Lab Use Only		412107901	
EMSL ANALYTICAL, INC. <small>LABORATORY PRODUCTS DIVISION</small>					
Customer Information			Billing Information		
Customer ID: [Blank]			Billing ID: [Blank]		
Company Name: Trident Environmental Services, Inc.			Company Name: Trident Environmental Services, Inc.		
Contact Name: Kevin Leedy			Billing Contact: Kevin Leedy		
Street Address: 500 Oakbrook Lane Suite E			Street Address: 500 Oakbrook Lane, Suite E		
City, State, Zip: Summerville SC 29485 Country: US			City, State, Zip: Summerville SC 29485 Country: [Blank]		
Phone: 8438733648			Phone: 8438733648		
Email(s) for Report: kevinleedy@tridentenvironmental.com			Email(s) for Invoice: [Blank]		
Project Information					
Project Name/No: Hilton Head Expressway Toll Plaza Hilton Head, SC				Purchase Order: [Blank]	
EMSL LIMS Project ID: [Blank] (If applicable, O&A will provide)				US State where samples collected: SC	
Sampled By Name: Leedy				Both of Connecticut (CT) must select project location: <input type="checkbox"/> Commercial (Taxable) <input type="checkbox"/> Residential (Non-Taxable)	
Sampled By Signature: 				No. of Samples to be Reported: 57	
Turn-Around-Time (TAT)					
<input type="checkbox"/> 0 Hour <input type="checkbox"/> 8 Hour <input checked="" type="checkbox"/> 24 Hour <input type="checkbox"/> 32 Hour <input type="checkbox"/> 48 Hour <input checked="" type="checkbox"/> 72 Hour <input type="checkbox"/> 96 Hour <input type="checkbox"/> 1 Week <input type="checkbox"/> 2 Week					
Please call ahead for large projects under turnaround times of 8 Hours or Less. *32 Hour TAT available for select tests only; samples must be submitted by 11:30am.					
PLM - Bulk (reporting limit)			TEM - Bulk		
<input checked="" type="checkbox"/> PLM EPA 800/P-82/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%) <input type="checkbox"/> POINT COUNT <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1,000 (<0.1%) POINT COUNT w/ GRAVIMETRIC <input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1,000 (<0.1%) <input type="checkbox"/> NIOSH 9602 (<1%) <input type="checkbox"/> NYS 158.1 (Friable - NY) <input type="checkbox"/> NYS 195.5 NOB (Non-Friable - NY) <input type="checkbox"/> NYS 198.8 (Vermiculite SM-V)			<input checked="" type="checkbox"/> TEM EPA NCB <input type="checkbox"/> NYS NOB 198.4 (Non-Friable-NY) <input type="checkbox"/> TEM EPA 600/R-83/116 w/ Milling Prep (0.1%) Other Tests (please specify)		
<input checked="" type="checkbox"/> Positive Stop - Clearly Identified Homogeneous Area (HA)					
Sample Information					
Sample Number	HA Number	Sample Location	Material Description		
See Attached COC					
Special Instructions and/or Regulatory Requirements (Sample Specifications, Processing Methods, Limits of Detection, etc.)					
Method of Shipment: FedEx					
Requisitioned by: Leedy			Sample Condition Upon Receipt:		
Date/Time: 09/02/21			Received by: 		Date/Time: 9/3/21 9:30am
Requisitioned by:			Received by: FL 8168 9172 1016		Date/Time:
Consent to Release - O&A on Asbestos Bulk (R 04/08/02) <input type="checkbox"/> AGREE TO ELECTRONIC SIGNATURE (By checking, I consent to signing this Chain of Custody document by electronic signature.)					
EMSL Analytical, Inc.'s Laboratory Terms and Conditions are incorporated into this Chain of Custody by reference in their entirety. Submission of samples to EMSL Analytical, Inc. constitutes acceptance and acknowledgment of all terms and conditions by Customer.					
Page 1 of 4			Page 1 of		

OrderID: 412107901

7101

TES
 Trident Environmental Services, Inc.
 Consultants in Industrial Hygiene and Safety
 500 Oakbrook Lane, Suite E
 Summerville, SC 29485
 Phone (843) 873-3648
 Fax (843) 821-1787

CHAIN OF CUSTODY FORM
Asbestos Bulk Samples

Project Name: Hilton Head Toll Plaza Date: 9/1/21
 Location: Hilton Head, SC

DESCRIPTION OF EACH SAMPLE AREA					ASSESSMENT OF MATERIALS			
Homog Area	Sample ID	Location	Description	Friable (+)	Friable (-)	Asbestos Type	COND Assess	HAZ Assess
	01	Tunnel	Duct HVAC-sealant		X			
	02		(light gray)			X		
	03					X		
02	04		Duct HVAC-sealant			X		
	05		(ox gray)			X		
	06					X		
03	07	Rowway	Base expansion joint		X			
	08				X			
	09				X			
04	10	Toll Booth Base	masker		X			
	11		(gray)		X			
	12				X			
05	13	Toll Plaza Roof	roll roofing		X			
	14				X			
	15				X			
06	16		roof fan		X			
	17				X			
	18				X			
07	19		roof drain		X			
	20				X			
	21				X			

CONDITION Assessment Categories
 (1) Thermal Systems Insulation - Good Condition
 (2) Thermal Systems Insulation - Damaged
 (3) Thermal Systems Insulation - Significantly Damaged
 (4) Surfacing - Good Condition
 (5) Surfacing - Damaged
 (6) Surfacing - Significantly Damaged
 (7) Miscellaneous - Good Condition
 (8) Miscellaneous - Damaged

Asbestos Fibers
 (1) Amosite
 (2) Chrysotile
 (3) Crocidolite
 (4) Anthophyllite
 (5) Tremolite
 (6) Actinolite
 ND - None Detected
 NT - Not Tested

HAZARD Assessment Categories
 G = Good Condition
 D = Damaged
 S = Significantly Damaged
 LPD = Low Potential for Disturbance
 PD = Potential for Damage
 PSD = Potential for Significant Damage

Samples Collected by: [Signature] Date / Time: 9/1/21
 Samples Received by: _____ Date / Time: _____

Page 2 of 4

OrderID: 412107901

7901

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CHAIN OF CUSTODY FORM
Asbestos Bulk Samples

Project Name: Hilton Head Toll Plaza Date: 9/1/21
 Location: Hilton Head, SC

DESCRIPTION OF EACH SAMPLE AREA						ASSESSMENT OF MATERIALS		
Room Area	Sample ID	Location	Description	Friable (+)	Friable (-)	Asbestos Type	COND Assess	HAZ Assess
	08 22	Toll Plaza	Roof insulation	X				
	23	}	insulation	X				
	24		(white)	X				
	09 25		insulation membrane					
	26							
	27	}						
	10 28		Roof CAULK			X		
	29					X		
	30					X		
	11 31	Roof Penthouse	caulk					
	32	}	(white)					
	33					X		
	34					X		
	12 34	Toll Plaza	stucco	X				
	35	}						
	36					X		
	37					X		
	38					X		
	39					X		
	40					X		
	13 41	Boardway tunnel	CAULK					
	42							

CONDITION Assessment Categories
 (1) Thermal Systems Insulation - Good Condition
 (2) Thermal Systems Insulation - Damaged
 (3) Thermal Systems Insulation - Significantly Damaged
 (4) Surfacing - Good Condition
 (5) Surfacing - Damaged
 (6) Surfacing - Significantly Damaged
 (7) Miscellaneous - Good Condition
 (8) Miscellaneous - Damaged

Asbestos Analysis
 (1) Amosite
 (2) Chrysotile
 (3) Crocidolite
 (4) Anthophyllite
 (5) Tremolite
 (6) Actinolite
 ND - None Detected
 NT - Not Tested

HAZARD Assessment Categories
 G = Good Condition
 D = Damaged
 S = Significantly Damaged
 LPD = Low Potential for Disturbance
 PD = Potential for Damage
 PSD = Potential for Significant Damage

Sample Collected by: [Signature] Date / Time: 9/1/21
 Sample Received by: _____ Date / Time: _____

OrderID: 412107901

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7901

CHAIN OF CUSTODY FORM
Asbestos Bulk Samples

Project Name: Hilton Head Toll Plaza Date: 9/1/21
 Location: Hilton Head, SC

DESCRIPTION OF EACH SAMPLE AREA						ASSESSMENT OF MATERIALS		
Homog Area	Sample ID	Location	Description	Friable (+)	Friable (-)	Asbestos Type	COND Access	HAZ Access
13	43	Roadway Tunnel	CAULK		X			
14	44	Toll Plaza	PLASTER	X				
	45	Underside		X				
	46			X				
	47			X				
	48			X				
	49			X				
	50			X				
15	51	Toll Plaza Side	Stucco Finish	X				
	52			X				
	53			X				
	54			X				
	55			X				
	56			X				
	57			X				

CONDITION Assessment Criteria
 (1) Thermal Systems Insulation - Good Condition
 (2) Thermal Systems Insulation - Damaged
 (3) Thermal Systems Insulation - Significantly Damaged
 (4) Surfacing - Good Condition
 (5) Surfacing - Damaged
 (6) Surfacing - Significantly Damaged
 (7) Miscellaneous - Good Condition
 (8) Miscellaneous - Damaged

Asbestos Present
 (1) Amosite
 (2) Chrysotile
 (3) Crocidolite
 (4) Anthophyllite
 (5) Tremolite
 (6) Actinolite
 ND - None Detected
 NT - Not Tested

HAZARD Assessment Criteria
 G = Good Condition
 D = Damaged
 S = Significantly Damaged
 LPD = Low Potential for Disturbance
 PD = Potential for Damage
 PSD = Potential for Significant Damage

Samples Collected by: [Signature]
 Samples Received by: _____

Date / Time: 9/1/21
 Date / Time: _____



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EMSL Order: 412107901
 Customer ID: TRID50
 Customer PO:
 Project ID:

Attention: Kevin Leedy
 Trident Environmental Services, Inc.
 500 Oakbrook Lane
 Suite E
 Summerville, SC 29485
Project: Hilton Head Expressway Toll Plaza Hilton Head, SC

Phone: (843) 670-9987
Fax:
Received Date: 09/03/2021 9:30 AM
Analysis Date: 09/03/2021 - 09/07/2021
Collected Date: 09/01/2021

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
01-01 412107901-0001	Tunnel - HVAC - Duct Sealnt (Light Gray)	Gray/White Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-Fibrous (Other)	None Detected
01-02 412107901-0002	Tunnel - HVAC - Duct Sealnt (Light Gray)	Gray/White Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-Fibrous (Other)	None Detected
02-04 412107901-0003	Tunnel - HVAC - Duct Sealnt (Dark Gray)	Gray Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-Fibrous (Other)	None Detected
02-05 412107901-0004	Tunnel - HVAC - Duct Sealnt (Dark Gray)	Gray Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-Fibrous (Other)	None Detected
03-07 412107901-0005	Roadway - Road Expansion Joint	Gray/Tan Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-Fibrous (Other)	None Detected
03-08 412107901-0006	Road Expansion Joint	Gray Non-Fibrous Homogeneous		100% Non-Fibrous (Other)	None Detected
04-10 412107901-0007	Toll Booth Base - Mastix (Gray)	Gray Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-Fibrous (Other)	None Detected
04-11 412107901-0008	Toll Booth Base - Mastix (Gray)	Gray Non-Fibrous Homogeneous		100% Non-Fibrous (Other)	None Detected
05-13 412107901-0009	Toll Plaza Roof - Roll Roofing	Brown/Black Non-Fibrous Homogeneous	5% Synthetic	5% Quartz 10% Ca Carbonate 80% Non-Fibrous (Other)	None Detected
05-14 412107901-0010	Toll Plaza Roof - Roll Roofing	White/Black Fibrous Heterogeneous	10% Synthetic	10% Quartz 10% Ca Carbonate 70% Non-Fibrous (Other)	None Detected
06-16 412107901-0011	Toll Plaza Roof - Roof Tar	Black Non-Fibrous Homogeneous		5% Quartz 10% Ca Carbonate 85% Non-Fibrous (Other)	None Detected
06-17 412107901-0012	Toll Plaza Roof - Roof Tar	Black Non-Fibrous Homogeneous	5% Cellulose	95% Non-Fibrous (Other)	None Detected
07-19 412107901-0013	Toll Plaza Roof - Roof Drain	Black Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-Fibrous (Other)	None Detected
07-20 412107901-0014	Toll Plaza Roof - Roof Drain	Black Fibrous Homogeneous	10% Cellulose	90% Non-Fibrous (Other)	None Detected
08-22 412107901-0015	Toll Plaza Roof - Roof Insulation	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-Fibrous (Other)	None Detected
08-23 412107901-0016	Toll Plaza Roof - Roof Insulation	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-Fibrous (Other)	None Detected

Report amended: 09/07/2021 13:28:14 Replaces initial report from: 09/03/2021 15:51:04 Reason Code: Client-Samples Added



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EMSL Order: 412107901
 Customer ID: TRID50
 Customer PO:
 Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
08-24 412107901-0017	Toll Plaza Roof - Roof Insulation	White Non-Fibrous Homogeneous	5% Cellulose	95% Non-fibrous (Other)	None Detected
09-25 412107901-0018	Toll Plaza Roof - Insulation Membrane	White/Black/Yellow Non-Fibrous Homogeneous	20% Glass	80% Non-fibrous (Other)	None Detected
09-26 412107901-0019	Toll Plaza Roof - Insulation Membrane	White/Black Fibrous Homogeneous	30% Glass	70% Non-fibrous (Other)	None Detected
10-28 412107901-0020	Toll Plaza Roof - Roof Caulk	Tan/White Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
10-29 412107901-0021	Toll Plaza Roof - Roof Caulk	Tan Non-Fibrous Homogeneous		10% Ca Carbonate 90% Non-fibrous (Other)	None Detected
11-31 412107901-0022	Roof Penthouse - Caulk (White)	Gray/White/Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
11-32 412107901-0023	Caulk (White)	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
12-34 412107901-0024	Toll Plaza - Stucco				Not Submitted
12-35 412107901-0025	Toll Plaza - Stucco				Not Submitted
12-36 412107901-0026	Toll Plaza - Stucco				Not Submitted
12-37 412107901-0027	Toll Plaza - Stucco				Not Submitted
12-38 412107901-0028	Toll Plaza - Stucco				Not Submitted
12-39 412107901-0029	Toll Plaza - Stucco				Not Submitted
12-40 412107901-0030	Toll Plaza - Stucco				Not Submitted
13-41 412107901-0031	Roadway Tunnel - Caulk	White Non-Fibrous Homogeneous		15% Ca Carbonate 85% Non-fibrous (Other)	None Detected
13-42 412107901-0032	Roadway Tunnel - Caulk	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14-44-Skim Coat 412107901-0033	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		5% Quartz 15% Ca Carbonate 80% Non-fibrous (Other)	None Detected
14-44-Rough Coat 412107901-0034	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		30% Quartz 70% Non-fibrous (Other)	None Detected
14-45-Skim Coat 412107901-0034	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		0% Quartz 15% Ca Carbonate 80% Non-fibrous (Other)	None Detected

Report amended: 09/07/2021 13:28:14 Replaces initial report from: 08/03/2021 15:51:04 Reason Code: Client-Samples Added



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EMSL Order: 412107901
 Customer ID: TRID50
 Customer PO:
 Project ID:

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
14-45-Rough Coat 412107901-00344	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		30% Quartz 70% Non-fibrous (Other)	None Detected
14-46-Skim Coat 412107901-0035	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		5% Ca Carbonate 95% Non-fibrous (Other)	None Detected
14-46-Rough Coat 412107901-00354	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		30% Quartz 70% Non-fibrous (Other)	None Detected
14-47-Skim Coat 412107901-0036	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		5% Quartz 10% Ca Carbonate 85% Non-fibrous (Other)	None Detected
14-47-Rough Coat 412107901-00364	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		30% Quartz 70% Non-fibrous (Other)	None Detected
14-48-Skim Coat 412107901-0037	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		10% Quartz 5% Ca Carbonate 85% Non-fibrous (Other)	None Detected
14-48-Rough Coat 412107901-00374	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		20% Quartz 5% Ca Carbonate 75% Non-fibrous (Other)	None Detected
14-49-Skim Coat 412107901-0038	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		10% Quartz 5% Ca Carbonate 85% Non-fibrous (Other)	None Detected
14-49-Rough Coat 412107901-00384	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		20% Quartz 5% Ca Carbonate 75% Non-fibrous (Other)	None Detected
14-50-Skim Coat 412107901-0039	Toll Plaza Underside - Plaster	White Non-Fibrous Homogeneous		10% Quartz 5% Ca Carbonate 85% Non-fibrous (Other)	None Detected
14-50-Rough Coat 412107901-00394	Toll Plaza Underside - Plaster	Gray Non-Fibrous Homogeneous		20% Quartz 5% Ca Carbonate 75% Non-fibrous (Other)	None Detected
15-51 412107901-0040	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 15% Ca Carbonate 75% Non-fibrous (Other)	None Detected
15-52 412107901-0041	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 15% Ca Carbonate 75% Non-fibrous (Other)	None Detected
15-53 412107901-0042	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 15% Ca Carbonate 75% Non-fibrous (Other)	None Detected
15-54 412107901-0043	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 10% Ca Carbonate 80% Non-fibrous (Other)	None Detected
15-55 412107901-0044	Toll Plaza Side - Stucco Finish	White Non-Fibrous Homogeneous	1% Fibrous (Other)	15% Quartz 15% Ca Carbonate 65% Non-fibrous (Other)	None Detected
15-56 412107901-0045	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 10% Ca Carbonate 80% Non-fibrous (Other)	None Detected
15-57 412107901-0046	Toll Plaza Side - Stucco Finish	Gray/White Non-Fibrous Homogeneous		10% Quartz 10% Ca Carbonate 80% Non-fibrous (Other)	None Detected

Report amended: 09/07/2021 13:28:14 Replaces initial report from: 09/03/2021 15:51:04 Reason Code: Client-Samples Added



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EMSL Order: 412107901
Customer ID: TRID50
Customer PO:
Project ID:

Analyst(s)

Brant Ayles (24)
Ky Nguyen (21)
Sarah Brennan (1)

Lee Plumley, Laboratory Manager
or Other Approved Signatory

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Samples analyzed by EMSL Analytical, Inc. Pineville, NC NVLAP Lab Code 200841-0, VA 3333 00312

Report amended: 09/07/2021 13:28:14 Replaces initial report from: 09/03/2021 15:51:04 Reason Code: Client-Samples Added



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EMSL Order: 412107901
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Attention: Kevin Leedy
 Trident Environmental Services, Inc.
 500 Oakbrook Lane
 Suite E
 Summerville, SC 29485
Project: Hilton Head Expressway Toll Plaza Hilton Head, SC

Phone: (843) 670-9987
Fax:
Received Date: 09/03/2021 9:30 AM
Analysis Date: 09/04/2021
Collected Date: 09/01/2021

Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
01-03 412107901-0047	Tunnel - HVAC Duct Sealant (Light Gray)	White Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
02-06 412107901-0048	Tunnel - HVAC Duct Sealant (Dark Gray)	Gray Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
03-06 412107901-0048	Roadway - Road Expansion Joint	Gray Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
04-12 412107901-0050	Toll Booth Base - Mastic (Gray)	Gray Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
05-15 412107901-0051	Toll Plaza Roof - Roll Roofing	Black Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
06-18 412107901-0052	Toll Plaza Roof - Roof Tar	White/Black Non-Fibrous Heterogeneous	97.5 Other	2.5 Fibrous_Other	No Asbestos Detected
07-21 412107901-0053	Toll Plaza Roof - Roof Drain	Black Non-Fibrous Heterogeneous	98.4 Other	1.6 Fibrous_Other	No Asbestos Detected
08-27 412107901-0054	Toll Plaza Roof - Insulation Membrane	Black Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
10-30 412107901-0055	Toll Plaza Roof - Roof Caulk	White Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
11-33 412107901-0056	Roof Penthouse - Caulk (White)	Clear Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected
15-43 412107901-0057	Roadway Tunnel - Caulk	Gray Non-Fibrous Heterogeneous	100.0 Other	None	No Asbestos Detected

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Samples analyzed by EMSL Analytical, Inc. Pineville, NC

Initial report from: 09/07/2021 08:51:40



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EMSL Order: 412107901
 Customer ID: TRID50
 Customer PO:
 Project ID:

Attention: Kevin Leedy
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Project: Hilton Head Expressway Toll Plaza Hilton Head, SC

Phone: (843) 670-9987
Fax:
Received Date: 09/03/2021 9:30 AM
Analysis Date: 09/04/2021
Collected Date: 09/01/2021

**Test Report: Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via
 EPA/600/R-93/116 Section 2.5.5.1**

Sample ID	Description	Appearance	% Matrix Material	% Non-Asbestos Fibers	Asbestos Types
-----------	-------------	------------	-------------------	-----------------------	----------------

Analyst(s)

 Aaron Hartley (11)

Lee Plumley

 Lee Plumley, Laboratory Manager
 or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Pineville, NC.

Initial report from: 09/07/2021 08:51:40

LEAD BASED PAINT INSPECTION

Lead-based paint testing was conducted in order to identify finishes that contain lead and which may be disturbed during the scheduled demolition/renovation. The identification of lead painted finishes will aid in the prevention of occupational exposure and/or environmental releases of lead dust in accordance with 29CFR 1926.62 (Lead in Construction) and provide information to facilitate proper disposal of lead-based paint components and debris. The lead survey describes the types, locations, and recommendations regarding the areas as related to lead-based paint.

Lead-Based Paint

The SCDHEC Bureau of Land and Waste Management defines lead-based paint as paint or other surface coatings, including varnish, shellac, stains, and enamels, that contain lead equal to or greater than 0.06% by weight (>600 ppm) **total lead or** >0.7mg/cm² via XRF. OSHA does not recognize a percentage of lead by weight for definition purposes, only the presence or absence of lead. The current OSHA regulations recognize an airborne action level of thirty micrograms per cubic meter (30ug/m³) during an eight-hour work shift, and a permissible exposure limit of fifty micrograms per cubic meter (50ug/m³). For the purpose of this survey, the OSHA Standard of any detectable limit is considered a lead-based paint.

Lead-Based Paint Investigative Procedures

Representative samples were collected from suspect paint finishes of the subject structure. Seven (7) samples were collected by scoring the area of a suspect paint down to the substrate utilizing a sharp implement and placing the sample in a sealed container. The suspect finishes were based on the color of the topcoat and the underlying layers and/or the substrate on which it has been applied. Fifty (50) X-Ray fluorescence (XRF) readings were taken by a Heueresis Corp XRF Lead Paint Analyzer, Model number Pb200i (Serial # 2103) providing on-site results.

The necessary data including sample number, location, and description were recorded. A chain-of-custody form was completed for the lead based paint chip samples and a shipped via Federal Express to the laboratory for analysis. The suspect lead-based paint samples were recorded on a Chain of Custody and shipped to Electron Microscopy Services Laboratory Analytical, Inc. (EMSL) to be analyzed by Flame Atomic Absorption Spectrophotometer (AAS) NIOSH method 7082 per the American Society for Testing and Materials (ASTM) Standard D3335-85A. The laboratory is accredited by the AIHA Lab Accreditation Program. ([Lab Code: 192283](#)).

LEAD-BASED PAINT SUMMARY & DATA TABLE

Lead-Based Paint Summary

For the purpose of this inspection, painted surfaces exceeding the SCDHEC disposal limit of 0.06 % by weight or 0.7 mg/cm² are considered lead-based paint. No samples meet the SCDHEC definition of lead-based paint. The black traffic light posts are considered lead-based paint in accordance with the OSHA definition of any detectable limit.

Lead-Based Paint Data Table

Sample ID	Surface Area	Substrate	Location	Paint Description	Lead Concentration
Pb-01	4 sq. in	Steel	Tunnel Door Frame	Beige	<0.0080%
Pb-02	4 sq. in	Steel	Tunnel Door	Beige	<0.019%
Pb-03	4 sq. in	Asphalt	Roadway Line	White	<0.0080%
Pb-04	4 sq. in	Steel	Toll Booth Protection Post	Yellow	<0.0089%
Pb-05	4 sq. in	Steel	Toll Booth	Green	<0.0095%
Pb-06	4 sq. in	Steel	Traffic Light	Yellow	<0.0087
**Pb-07	4 sq. in	Steel	Traffic Light Post	Black	0.0087%

*Exceeds SCDHEC Regulatory Limit 0.05%

**OSHA Regulatory Limit = any detectable level of lead paint

XRF LEAD-BASED PAINT SAMPLE DATA TABLE

Reading #	Location	Component Description	Substrate	Color	Condition	Result	XRF Reading (mg/cm ²)
1	Pre-Inspection Instrument Calibration Check (Pass)						0.9
2	Calibration Check (Pass)						0.9
3	Calibration Check (Pass)						0.9
4	Admin Stairwell	Wall C	Concrete	Light Blue	Intact	Negative	0
5	Admin Stairwell	Handrail C	Metal	Blue	Intact	Negative	-0.1
6	Admin Stairwell	Stair Stringer C	Metal	Blue	Intact	Negative	0.1
7	Admin Stairwell	Door C	Metal	Beige	Intact	Negative	-0.1
8	Admin Stairwell	Door Frame C	Metal	Beige	Intact	Negative	0.3
9	Admin Stairwell	Floor/Landing	Concrete	Gray	Intact	Positive	0
10	Tunnel	Elevator Door B	Metal	Brown	Intact	Negative	0.1
11	Tunnel	Elevator Frame/Casing B	Metal	Brown	Intact	Negative	0.3
12	Tunnel	Exit #1/Exit Door C	Metal	Beige	Intact	Negative	-0.1
13	Tunnel	Exit #1/Exit Door Frame C	Metal	Beige	Intact	Negative	0.5
14	Tunnel	Exit #1/Closet Door Frame C	Metal	Beige	Intact	Negative	0.5
15	Tunnel	Exit #1/Closet Door C	Metal	Beige	Intact	Negative	0.1
16	Tunnel	Exit #1/Stairs Handrail C	Metal	White	Intact	Negative	-0.1
17	Tunnel	Exit #1/ Stairs Riser C	Concrete	White	Intact	Negative	0.1
18	Tunnel	Exit #1/Stairs Wall Header A	Concrete	White	Intact	Negative	0
19	Tunnel	Exit #1/Stairs Wall C	Concrete	White	Intact	Negative	-0.1
20	Tunnel	Exit #3/ Exit Door C	Metal	Beige	Intact	Negative	-0.1
21	Tunnel	Exit #3/Exit Door Frame C	Metal	Beige	Intact	Negative	0
22	Tunnel	Exit #3/Closet Door C	Metal	Beige	Intact	Negative	0
23	Tunnel	Exit #3/Closet Door Frame C	Metal	Beige	Intact	Negative	0.6
24	Tunnel	Exit #3/Stairs Handrail C	Metal	White	Intact	Negative	0

XRF LEAD-BASED PAINT SAMPLE DATA TABLE

Reading #	Location	Component Description	Substrate	Color	Condition	Result	XRF Reading (mg/cm ²)
25	Tunnel	Exit #3/Stairs Riser C	Concrete	White	Intact	Negative	0
26	Tunnel	Exit #3/Stairs Wall Header A	Concrete	White	Intact	Negative	0.2
27	Tunnel	Maintenance Cage/Door D	Metal	Beige	Intact	Negative	-0.1
28	Exterior	Traffic Paint (west lane)	Concrete	White	Intact	Negative	0
29	Exterior	Booth #8/Traffic Post	Concrete	Yellow	Intact	Negative	0.3
30	Exterior	Booth #8/Booth	Metal	Green	Intact	Positive	0.4
31	Exterior	Booth #8/Base Sealant	Concrete	Silver	Intact	Negative	0.3
32	Exterior	Booth #8/Stoplight Post Canopy Column/1 of 8	Metal	Black	Intact	Negative	0
33	Exterior	Canopy Column/1 of 8 (northwest column)	Concrete	Beige	Intact	Negative	0.1
34	Exterior	Canopy Column/5 of 8 (southwest column)	Concrete	Beige	Intact	Negative	0
35	Exterior	Booth #8/Traffic Grate	Metal	Red	Intact	Negative	0
36	Exterior	Canopy Roof	Metal	Green	Intact	Negative	0
37	Exterior	Canopy Siding B	Stucco	Beige	Intact	Negative	0
38	Exterior	Booth #1/Stoplight Casing	Metal	Yellow	Intact	Negative	0.6
39	Exterior	Booth #1/Booth	Metal	Green	Intact	Negative	-0.1
40	Exterior	Booth #1/Traffic Post	Concrete	Yellow	Intact	Negative	0
41	Exterior	Booth #1/Base Sealant	Concrete	Silver	Intact	Negative	-0.1
42	Exterior	Booth #1/Stoplight Post	Metal	Black	Intact	Negative	0.2
43	Exterior	Canopy Column/4 of 8 (northeast corner)	Concrete	Beige	Intact	Negative	0.1
44	Exterior	Booth #3/Booth	Metal	Green	Intact	Negative	-0.1

XRF LEAD-BASED PAINT SAMPLE DATA TABLE

Reading #	Location	Component Description	Substrate	Color	Condition	Result	XRF Reading (mg/cm ²)
45	Exterior	Booth #3/Traffic Post	Concrete	Yellow	Intact	Negative	0
46	Exterior	Booth #3/Stoplight Post	Metal	Black	Intact	Negative	0.1
47	Exterior	Booth #3/Stoplight Casing	Metal	Yellow	Intact	Negative	0.6
48	Exterior	Booth #3/Traffic Grate	Metal	Red	Intact	Negative	0.1
49	Exterior	Booth #5/Booth	Metal	Green	Intact	Negative	0
50	Exterior	Booth #5/Traffic Post	Concrete	Yellow	Intact	Negative	0
51	Exterior	Booth #5/Stoplight Post	Metal	Black	Intact	Negative	0.3
52	Exterior	Booth #5/Stoplight Casing	Metal	Yellow	Intact	Negative	0.6
53	Exterior	Booth #5/Traffic Grate	Metal	Red	Intact	Negative	0
54	Post Inspection Instrument Calibration Check (Pass)						1.1
55	Calibration Check (Pass)						1.0
56	Calibration Check (Pass)						1.0

LEAD-BASED PAINT CONCLUSION / RECOMMENDATIONS

Conclusions

Lead-based paint was not identified by XRF readings. Paint chip analysis on the black stop light posts meet the OSHA definition of lead-based paint. Destructive actions to lead-based, painted finishes that may create a lead exposure hazard (sanding, torching, blasting, etc.) require compliance with OSHA, including proper training and exposure monitoring.

Recommendations

Refer to State (SCDHEC) guidelines for additional information about the state-specific requirements regarding the disposal of materials containing lead paint including Toxicity Characteristic Leaching Procedure (TCLP) analysis. Accumulations of lead paint (chips, blasting debris, etc.) must be analyzed by TCLP to determine if the debris is classified as “hazardous waste” (greater than or equal to 5mg/kg). Collection and analysis of a TCLP sample is recommended prior to disposal of any waste with a potential to contain lead.

Destructive actions to lead-based paint finishes that may create a lead exposure hazard (sanding, manual demolition, torch cutting, blasting, etc.) require compliance with OSHA, including proper training, exposure monitoring and proper disposal. OSHA considers all lead containing paints applicable to enforcement, and would require training, engineering controls, and administrative controls in accordance with 29 CFR 1926.62. In the event building components that tested positive for lead are disturbed during renovations, then contractors and workers should be informed as to the presence of LBP. Air monitoring for airborne lead concentrations is recommended during any lead abatement activities.

United States Environmental Protection Agency

This is to certify that



James Pease
Risk Assessor

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

In the Jurisdiction of:

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

This certification is valid from the date of issuance and expires August 31, 2023



LBP-R-7570-2
Certification #
July 24, 2020
Issued On


Adrienne Priselac, Manager, Toxics Office
Land Division



AIHA Laboratory Accreditation Programs, LLC

acknowledges that

EMSL Analytical, Inc.
376 Crompton Street, Unit 71, Charlotte, NC 28273
Laboratory ID: 192283

along with all premises from which key activities are performed, as listed above, has fulfilled the requirements of the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC accreditation to the ISO/IEC 17025:2005 international standard, *General Requirements for the Competence of Testing and Calibration Laboratories* in the following:

LABORATORY ACCREDITATION PROGRAMS

- ✓ INDUSTRIAL HYGIENE Accreditation Expires: September 01, 2018
- ✓ ENVIRONMENTAL LEAD Accreditation Expires: September 01, 2018
- ✓ ENVIRONMENTAL MICROBIOLOGY Accreditation Expires: September 01, 2018
- FOOD Accreditation Expires:
- UNIQUE SCOPES Accreditation Expires:

Specific Field(s) of Testing (FoT)(Method(s)) within each Accreditation Program for which the above named laboratory maintains accreditation is outlined on the attached **Scope of Accreditation**. Continued accreditation is contingent upon successful on-going compliance with ISO/IEC 17025:2005 and AIHA-LAP, LLC requirements. This certificate is not valid without the attached **Scope of Accreditation**. Please review the AIHA-LAP, LLC website (www.aihaaccreditedlabs.org) for the most current Scope.

William Walsh

William Walsh, CHH
Chairperson, Analytical Accreditation Board

Revision 15-03/30/2016

Cheryl O. Morton

Cheryl O. Morton
Managing Director, AIHA Laboratory Accreditation Programs, LLC

Date Issued: 09/29/2016

LEAD-BASED PAINT CHIPS PHOTOGRAPHS



Pb-01
TUNNEL DOOR FRAME (BEIGE)



Pb-02
TUNNEL DOOR (BEIGE)



Pb-03
ROADWAY LINE PAINT (WHITE)



Pb-04
BOOTH PROTECTION POST (YELLOW)



Pb-05
TOLL BOOTH (GREEN)



Pb-06
TRAFFIC LIGHT (YELLOW)

LEAD-BASED PAINT CHIPS PHOTOGRAPHS



Pb-07
TRAFFIC LIGHT POST (BLACK)

XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #04
CONCRETE WALL (LT. BLUE)



READING #05
HANDRAIL (BLUE)



READING #06
STAIR STRINGER



READING #07, #08
DOOR (BEIGE), DOOR FRAME (BEIGE)



READING #09
CONCRETE FLOOR LANDING (GRAY)



READING #10, #11
ELEVATOR DOOR (BROWN)
FRAME/CASING (BROWN)

XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #12, #13
EXIT #1 DOOR (BEIGE)/FRAME(BEIGE)



READING #14, #15
EXIT #1 CLOSET DOOR/FRAME



READING #16
EXIT #1 STAIR HANDRAIL (WHITE)



READING #17
EXIT #1 STAIR RISER (WHITE)



READING #18
EXIT #1 STAIR WALL HEADER (WHITE)

**NO
PHOTO
AVAILABLE**

READING #19
EXIT #1 STAIR WALL (WHITE)

XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #20, #21
EXIT #3 DOOR (BEIGE)/FRAME(BEIGE)



READING #22, #23
EXIT #3 CLOSET DOOR (BEIGE)/FRAME (BEIGE)



READING #24
EXIT #3 STAIR HANDRAIL (WHITE)



READING #25
EXIT #3 STAIR RISER



READING #26
EXIT #3 STAIR WALL HEADER



READING #27
MAINTENANCE DOOR CAGE (BEIGE)

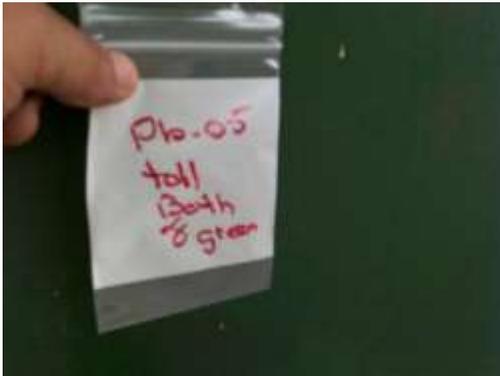
XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #28
WEST LANE TRAFFIC PAINT (WHITE)



READING #29
BOOTH #8 TRAFFIC POST (YELLOW)



READING #30
BOOTH #8 (GREEN)



READING #31
BOOTH #8 BASE SEALANT (GRAY)



READING #32
BOOTH #8 STOP LIGHT POST (BLACK)



READING #33, #34
CONCRETE CANOPY COLUMN (BEIGE)

XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #35
BOOTH #8 TRAFFIC GATE (RED)



READING #36
CANOPY ROOF (GREEN)



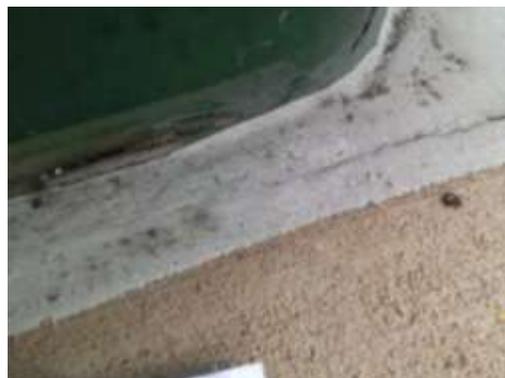
READING #37
CANOPY SIDING (BEIGE)



READING #38
BOOTH #8 STOP LIGHT CASING (YELLOW)



READING #39, #40
BOOTH #1 (GREEN)
BOOTH #1 TRAFFIC POST (YELLOW)



READING #41
BOOTH #1 BASE SEALANT (SILVER)

XRF LEAD-BASED PAINT PHOTOGRAPHS



READING #42
BOOTH #1 STOP LIGHT POST (BLACK)



READING #43, #44, #45, #46, #47, #48
BOOTH # 3 COLUMN, BOOTH #3,
BOOTH #3 TRAFFIC POST/CASING
BOOTH #3 TRAFFIC GATE



READING #49, #50, #51, #52, #53
BOOTH # 5, BOOTH #5 TRAFFIC POST,
BOOTH #5 STOPLIGHT POST/CASING,
BOOTH #5 TRAFFIC GATE

Order ID: 412105567

Lead Chain of Custody
 EMSL Order Number / Lab Use Only

412105567

EMSL Analytical, Inc.
 10801 Southern Loop Blvd
 Piseville, NC 28134
 PHONE: (704) 525-2265
 EMAIL:

EMSL ANALYTICAL, INC.
 LABORATORY PRODUCTS TRAINING

Customer Information		Billing Information	
Customer ID: [Blank]		Billing ID: [Blank]	
Company Name: Trident Environmental Services, Inc.		Company Name: Trident Environmental Services, Inc.	
Contact Name: Kevin Leedy		Billing Contact: Kevin Leedy	
Street Address: 500 Oakbrook Lane Suite E		Street Address: 500 Oakbrook Lane, Suite E	
City, State, Zip: Summerville SC 29485 Country: US		City, State, Zip: Summerville SC 29485 Country:	
Phone: 8438733648		Phone: 8438733648	
Email(s) for Report: kevinleedy@tridentenvironmental.com		Email(s) for Invoice: [Blank]	

Project Information

Project Name: Crabtree Swamp Bridge (S-548 RBO) Conway, SC

EMSL LIMS Project ID: [Blank] US State where samples collected: SC State of Collection (CT) must select project location: Commercial (Taxable) Residential (Non-Taxable)

Sampled By Name: Pease Sampled By Signature: [Signature] No. of Samples in Sequence: 3

Turn-Around Time (TAT)

3 Hour 6 Hour 24 Hour 32 Hour 48 Hour 72 Hour 96 Hour 1 Week 2 Week

Please call ahead for large projects and/or turnaround times 6 Hours or Less. 72 Hour TAT available for select tests only, samples must be submitted by 11:59am.

MATRIX	METHOD	INSTRUMENT	REPORTING LIMIT	SELECTION
CHIPS <input type="checkbox"/> by wt. <input type="checkbox"/> by vol. <input type="checkbox"/> by area	SW 846-7000B	Flame Atomic Absorption	0.008% (80ppm)	<input checked="" type="checkbox"/>
Reporting Limit based on a minimum 0.25g sample weight	SW 846-6010D	ICP-OES	0.0004% (4ppm)	<input type="checkbox"/>
	NIOSH 7082	Flame Atomic Absorption	4ppb/liter	<input type="checkbox"/>
AIR	NIOSH 7300M / NIOSH 7303M	ICP-OES	0.5ppb/liter	<input type="checkbox"/>
	NIOSH 7300M / NIOSH 7303M	ICP-MS	0.05ppb/liter	<input type="checkbox"/>
WPE <input type="checkbox"/> ASTM <input type="checkbox"/> non-ASTM	SW 846-7000B	Flame Atomic Absorption	10µg/wipe	<input type="checkbox"/>
If no box is checked, non-ASTM Wipe is assumed	SW 846-6010D	ICP-OES	1.0ppb/wipe	<input type="checkbox"/>
TCLP	SW 846-1311 / 7000B / SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW 846-1311 / SW 846-6010D*	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
SPLP	SW 846-1312 / 7000B / SM 3111B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	SW 846-1312 / SW 846-6010D*	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
TTLC	22 CCR App. II, 7000B	Flame Atomic Absorption	40mg/kg (ppm)	<input type="checkbox"/>
	22 CCR App. II, SW 846-6010D*	ICP-OES	2mg/kg (ppm)	<input type="checkbox"/>
STLC	22 CCR App. II, 7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
	22 CCR App. II, SW 846-6010D*	ICP-OES	0.1 mg/L (ppm)	<input type="checkbox"/>
Soil	SW 846-7000B	Flame Atomic Absorption	40mg/kg (ppm)	<input type="checkbox"/>
	SW 846-6010D*	ICP-OES	2mg/kg (ppm)	<input type="checkbox"/>
Wastewater	SM 3111B / SW 846-7000B	Flame Atomic Absorption	0.4 mg/L (ppm)	<input type="checkbox"/>
Unpreserved				
Preserved with HNO3 <input type="checkbox"/> PH<2	EPA 200.7	ICP-OES	0.020 mg/L (ppm)	<input type="checkbox"/>
Drinking Water	EPA 200.5	ICP-OES	0.003 mg/L (ppm)	<input type="checkbox"/>
Unpreserved				
Preserved with HNO3 <input type="checkbox"/> PH<2	EPA 200.8	ICP-MS	0.001 mg/L (ppm)	<input type="checkbox"/>
TSP/SPM Filter	40 CFR Part 60	ICP-OES	12 µg/filter	<input type="checkbox"/>
Other:				<input type="checkbox"/>

Sample Number	Sample Location	Volume / Area	Date / Time Sampled
Pb-01	Roadway Line Paint (white)	3 sq inches	06/29/21
Pb-02	Roadway Line Paint (yellow)	3 sq inches	06/29/21
Pb-03	Metal Bracket Paint (orange)	2 sq inches	06/29/21

Method of Shipment: FedEx

Retrieved by: Pease Date/Time: 06/29/21

Received by: [Signature] Date/Time: 7/11/21 1045Ez

Retrieved by: [Blank] Date/Time: [Blank]

Received by: [Blank] Date/Time: [Blank]

8168 9172 0785

*6010C Available Upon Request

AGREE TO ELECTRONIC SIGNATURE (By checking, I consent to signing this Chain of Custody document by electronic signature.)

EMSL Analytical, Inc.'s Laboratory Terms and Conditions are incorporated into this Chain of Custody by reference in their entirety. Submission of samples to EMSL Analytical, Inc. constitutes acceptance and acknowledgment of all terms and conditions by Customer.

Page 1 of 1

Page 1 of 2



EMSL Analytical, Inc.

10801 Southern Loop Blvd, Pineville, NC 28134
 Phone/Fax: (704) 525-2205 / (704) 525-2382
<http://www.EMSL.com> charlof@teslab@gmail.com

EMSL Order: 412107998
 CustomerID: TRID50
 CustomerPO:
 ProjectID:

Attn: **Kevin Leedy**
Trident Environmental Services, Inc.
500 Oakbrook Lane
Suite E
Summerville, SC 29485

Phone: (843) 873-3648
 Fax:
 Received: 9/7/2021 09:10 AM
 Collected: 9/1/2021

Project: **Hilton Head Toll Plaza**

Test Report: Lead in Paint Chips by Flame AAS (SW 846 3050B/7000B)*

Client Sample Description	Lab ID	Collected	Analyzed	Weight	Lead Concentration
Pb-01 Site: Tunnel Door Frame (Beige) Steel	412107998-0001	9/1/2021	9/8/2021	2590 g	<0.0080 % wt
Pb-02 Site: Tunnel Door (Beige) Steel	412107998-0002	9/1/2021	9/8/2021	1031 g	<0.019 % wt
Pb-03 Site: Roadway Line Paint (White) Asphalt	412107998-0003	9/1/2021	9/8/2021	2540 g	<0.0060 % wt
Pb-04 Site: Booth Protection Post (Yellow) Steel	412107998-0004	9/1/2021	9/8/2021	2247 g	<0.0089 % wt
Pb-05 Site: Toll Booth (Green) Steel	412107998-0005	9/1/2021	9/8/2021	2108 g	<0.0095 % wt
Pb-06 Site: Traffic Light (Yellow) Steel	412107998-0006	9/1/2021	9/8/2021	2303 g	<0.0067 % wt
Pb-07 Site: Traffic Light Post (Black) Steel	412107998-0007	9/1/2021	9/8/2021	2662 g	0.0067 % wt

Aaron Hartley, Lead Technical Manager
 or other approved signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted.
 Analysis following Lead in Paint by EMSL SOP/Determination of Environmental Lead by FLAA. Reporting limit is 0.008%, set based on the minimum sample weight per our SOP. "<" (less than) result signifies the analyte was not detected at or above the reporting limit. Measurement of uncertainty is available upon request. Deviations/modifications are available upon request.
 Samples analyzed by EMSL Analytical, Inc. Pineville, NC ARIA-LAP, LLC - ELLAP 192283

Initial report from 09/08/2021 14:18:34