



Commonwealth Environmental Associates, Inc.

**ASBESTOS SURVEY REPORT
FORMER DOLLAR GENERAL
1101 NORTH ILLINOIS STREET
HARRISBURG, ARKANSAS 72432**

Prepared for:

O'Reilly Automotive Stores, Inc.
Springfield, Missouri

Prepared by:

Commonwealth Environmental Associates, Inc.
Lexington, Virginia

February 19, 2021



Commonwealth Environmental Associates, Inc.

February 19, 2021

O'Reilly Automotive Stores, Inc.
Legal Department
233 South Patterson
Springfield, MO 65802

Attn: Erica Uhler

RE: Asbestos Survey Report
Former Dollar General
1101 North Illinois Street
Harrisburg, Arkansas 72432
CEA Project No. L2521

Greetings:

Commonwealth Environmental Associates, Inc. (CEA) is pleased to submit this Asbestos Survey Report for the above referenced site. These services have been performed in accordance with our standard terms and limitations.

Purpose of Study

The purpose of this study was to obtain representative samples of suspect Asbestos Containing Materials (ACM) for laboratory analysis from the structure identified as the former Dollar General located at 1101 North Illinois Street in Harrisburg, Arkansas.

Scope of Services

Our scope of services for this phase of the project included the following:

- The identification and representative sampling of suspect ACM identified within the site structure by an Arkansas licensed asbestos inspector (Arkansas Asbestos Inspector License / Certification Number 015183).
 - Submission of samples to a National Voluntary Laboratory Accreditation Program (NVLAP) accredited laboratory for bulk asbestos analysis utilizing Polarized Light Microscopy (PLM).
 - Preparation of this findings report presenting identified asbestos containing materials, bulk asbestos analysis, pertinent Quality Assurance (QA) / Quality Control (QC) information and any conclusions and recommendations.
-

Asbestos Inspection

CEA partnered with Safety & Environmental Investigation (SEI), Inc. to perform the asbestos inspection of the site structure on February 10, 2021. Joshua A. Roberson (Arkansas Asbestos Inspector License / Certification Number 015183) completed the inspection of the subject structure. The subject study area consisted of one (1) commercial structure that formerly operated as a Dollar General. SEI identified the sampling areas as homogenous and sampled accordingly. Materials identified and sampled in the study area of the structure included floor tile, mastic, drywall, joint compound, and ceiling tile. Materials noted at the site and not sampled during this study included plastics, natural wood products, silicon, glass, concrete and brick. The materials collected during this study and the associated laboratory analysis is presented as Table 1, Attachment A.

Laboratory Analysis

CEA and SEI submitted a total of twenty (20) samples collected from the subject structure to Hayes Microbial Consulting (NVLAP #500096-0) located in Midlothian, Virginia for PLM analysis. Including the laboratory separated samples, a total of thirty (30) samples were analyzed. Of the thirty (30) samples, no samples were reported to contain asbestos. Additionally, no samples were reported to contain trace (< 1%) asbestos fibers. The Asbestos Analytical Report is presented as Attachment B.

Conclusions and Recommendations

CEA and SEI completed an asbestos survey in association with the structure identified as the former Dollar General located at 1101 North Illinois Street in Harrisburg, Arkansas. A total of thirty (30) samples were collected and analyzed by PLM during this study. Based on the laboratory analysis, no samples were identified as containing greater than 1% asbestos. No samples were reported to contain trace amounts (< 1%) asbestos fibers. The United States (US) Environmental Protection Agency (EPA) defines ACM as any material containing 1% or greater asbestos fiber content. The United States Occupational Safety and Health Administration (OSHA) Asbestos Construction Standard applies regardless of the amount of asbestos present.

CEA appreciates the opportunity to provide asbestos inspection services for this project. If you should have any questions, please do not hesitate to contact our office at (804) 275-9320.

Sincerely,

COMMONWEALTH ENVIRONMENTAL ASSOCIATES, INC.

By: 

Josh Seaman
Project Manager

By: 

W. Fred Mayes
President

Attachments: A – Table
B – Asbestos Analytical Report
C – Arkansas License / Certification

Asbestos Limitations for Inspection, Bulk Sampling and Analysis Reports

This report has been prepared for the exclusive use of the O'Reilly Automotive Stores, Inc. and/or agents. This report has been prepared in accordance with generally accepted environmental practices. No other warranty, expressed or implied, is made. Our conclusions and recommendations are based, in part, upon information provided to us by others and our site observations. We have not verified the completeness or accuracy of the information provided by others.

Our observations and recommendations are based upon conditions readily visible during the site at the time of our site visit, and upon current industry standards. During CEA's inspection, all accessible areas were visually surveyed for the presence of suspect asbestos-containing materials. Inaccessible areas, such as behind solid ceilings or behind solid walls were not surveyed. Areas inspected for suspect asbestos-containing materials were limited to those designated by the scope of services. All samples were collected by individuals who have completed EPA approved asbestos inspector/management planner courses. Samples were collected and submitted for analysis via polarized light microscopy at CEA's NVLAP accredited laboratory.

CEA, by the virtue of providing the services described in this report, does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, State, or Federal public agencies any conditions at the site that may present a potential danger to public health, safety, or the environment. It is the Client's responsibility to notify the appropriate local, state, or federal public agencies as required by law, or otherwise to disclose, in a timely manner, any information that may be necessary to prevent any danger to public health, safety, or the environment.

Under this scope of services, CEA assumes no responsibility regarding response actions (O&M plan, encapsulation, abatement, removal, etc.) initiated as a result of these findings. Response actions are the sole responsibility of the Client and should be conducted in accordance with local, State, and/or Federal requirements, and should be performed by appropriate licensed-asbestos personnel, as warranted.

ATTACHMENT A

TABLE 1

TABLE 1
Asbestos Sample Results
1101 North Illinois Street
Harrisburg, Arkansas
February 10, 2021

Sample	Sample Description	Sample Location	Condition	Friable	Asbestos %
FT01-01	Floor Tile (Tan)	Sales Area	N/A	No	None Detected
FT01-01	Mastic	Sales Area	N/A	N/A	None Detected
FT01-02	Floor Tile (Tan)	Sales Area	N/A	No	None Detected
FT01-02	Mastic	Sales Area	N/A	N/A	None Detected
FT02-03	Floor Tile (Cream)	Sales Area Replacement	N/A	N/A	None Detected
FT02-03	Mastic	Sales Area Replacement	N/A	N/A	None Detected
FT02-04	Floor Tile (Cream)	Sales Area Replacement	N/A	N/A	None Detected
FT02-04	Mastic	Sales Area Replacement	N/A	N/A	None Detected
FT03-05	Floor Tile (Brown)	Sales Area Replacement	N/A	N/A	None Detected
FT03-05	Mastic	Sales Area Replacement	N/A	N/A	None Detected
FT03-06	Floor Tile (Brown)	Sales Area Replacement	N/A	N/A	None Detected
FT03-06	Mastic	Sales Area Replacement	N/A	N/A	None Detected
FT04-07	Floor Tile (Speckled)	Restrooms	N/A	N/A	None Detected
FT04-07	Mastic	Restrooms	N/A	N/A	None Detected
FT04-08	Floor Tile (Speckled)	Restrooms	N/A	N/A	None Detected
FT04-08	Mastic	Restrooms	N/A	N/A	None Detected
CB01-09	Cove Base Mastic (Brown)	Sales Area	N/A	N/A	None Detected
CB01-10	Cove Base Mastic (Brown)	Sales Area	N/A	N/A	None Detected
CB02-11	Cove Base Mastic (Black)	Sales Area	N/A	N/A	None Detected
CB02-12	Cove Base Mastic (Black)	Sales Area	N/A	N/A	None Detected
CB03-13	Cove Base Mastic (Tan)	Restrooms	N/A	N/A	None Detected
CB03-14	Cove Base Mastic (Tan)	Restrooms	N/A	N/A	None Detected
SR01-15	Drywall	Interior	N/A	N/A	None Detected
SR01-15	Joint Compound	Interior	N/A	N/A	None Detected
SR01-16	Drywall	Interior	N/A	N/A	None Detected
SR01-16	Joint Compound	Interior	N/A	N/A	None Detected
CT01-17	Ceiling Tile	Sales Area	N/A	N/A	None Detected
CT01-18	Ceiling Tile	Sales Area	N/A	N/A	None Detected
CT02-19	Ceiling Tile	Sales Area Replacement	N/A	N/A	None Detected
CT02-20	Ceiling Tile	Sales Area Replacement	N/A	N/A	None Detected

ATTACHMENT B
ASBESTOS ANALYTICAL REPORT

Analysis Report prepared for

Commonwealth Environmental Associates, Inc.

648 Waddell Street
Lexington, VA 24450

Phone: (540) 462-6077

L2521
1101 N. Illinois St.
Harrisburg, AR

Collected: **February 10, 2021**
Received: **February 11, 2021**
Reported: **February 18, 2021**



EPA Laboratory ID: VA01419



Lab ID: #188863

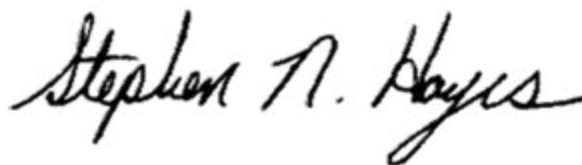


DPH License: #PH-0198

We would like to thank you for trusting Hayes Microbial for your analytical needs!
We received 20 samples by FedEx in good condition for this project on February 11th, 2021.

The results in this analysis pertain only to this job, collected on the stated date, and should not be used in the interpretation of any other job. This report may not be duplicated, except in full, without the written consent of Hayes Microbial Consulting, LLC..

This laboratory bears no responsibility for sample collection activities, analytical method limitations, or your use of the test results. Interpretation and use of test results are your responsibility. Any reference to health effects or interpretation of mold levels is strictly the opinion of Hayes Microbial. In no event, shall Hayes Microbial or any of its employees be liable for lost profits or any special, incidental or consequential damages arising out of the use of these test results.

A handwritten signature in black ink that reads "Stephen N. Hayes".

Steve Hayes, BSMT(ASCP)
Laboratory Director
Hayes Microbial Consulting, LLC.

#	Sample	Material Description	Non-Asbestos Fibers	Asbestos Fibers
1	FT01-01 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
2	FT01-02 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
3	FT02-03 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
4	FT02-04 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
5	FT03-05 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
6	FT03-06 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
7	FT04-07 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected

#	Sample	Material Description	Non-Asbestos Fibers	Asbestos Fibers
8	FT04-08 - Floor Tile / Mastic	Tile / White		None Detected
		Adhesive / Yellow		None Detected
9	CB01-09 - Mastic	Adhesive / White		None Detected
10	CB01-10 - Mastic	Adhesive / White		None Detected
11	CB02-11 - Mastic	Adhesive / Brown		None Detected
12	CB02-12 - Mastic	Adhesive / White		None Detected
13	CB03-13 - Mastic	Adhesive / White		None Detected
14	CB03-14 - Mastic	Adhesive / White		None Detected
15	SR01-15 - Drywall / Joint Compound	Drywall / White/Brown	12% Cellulose Fibers	None Detected
		Joint Compound / White		None Detected
16	SR01-16 - Drywall / Joint Compound	Drywall / White/Brown	12% Cellulose Fibers	None Detected
		Drywall / White/Brown	12% Cellulose Fibers	None Detected
17	CT01-17 - Ceiling Tile	Fibrous / Gray	35% Fiberglass 30% Cellulose Fibers	None Detected
18	CT01-18 - Ceiling Tile	Fibrous / Gray	35% Fiberglass 30% Cellulose Fibers	None Detected

#	Sample	Material Description	Non-Asbestos Fibers	Asbestos Fibers
19	CT02-19 - Ceiling Tile	Fibrous / Gray	35% Fiberglass 30% Cellulose Fibers	None Detected
20	CT02-20 - Ceiling Tile	Fibrous / Gray	35% Fiberglass 30% Cellulose Fibers	None Detected

Asbestos Analysis Information

Analysis Details	All samples were received in acceptable condition unless otherwise noted on the report. This report must not be used by the client to claim product certification, approval, or endorsement by AIHA, NIST, NVLAP, NY ELAP, or any agency. The results relate only to the items tested. Hayes Microbial Consulting reserves the right to dispose of all samples after a period of 60 days in compliance with state and federal guidelines.
PLM Analysis	All Polarized Light Microscopy (PLM) results include an inherent uncertainty of measurement associated with estimating percentages by PLM. Materials with interfering matrix, low asbestos content, or small fiber size may require additional analysis via TEM Analysis.
TEM Analysis	Analysis by TEM is capable of providing positive identification of asbestos type(s) and semi-quantitation of asbestos content.
Definitions	'None Detected' - Below the detected reporting limit of 1% unless point counting is performed, then the detected reporting limit is .25%.
New York ELAP	<p>Per NY ELAP198.6 (NOB), TEM is the only reliable method to declare an NOB material as Non-Asbestos Containing.</p> <p>Any NY ELAP samples that are subcontracted to another laboratory will display the name and ELAP Lab Identification number in the report page heading of those samples. The original report provided to Hayes Microbial Consulting is available upon request.</p>



Company: COMMONWEALTH ENVIRONMENTAL
Address: 648 WADSWORTH ST
LEXINGTON, VA 24450

N

SHIP: FEDEX - BOX 50

DATE: 02-11-2021

8160 4411 2625



ASBESTOS



21004742

Job Number: <u>L2521</u>	Job Name:
Collector: <u>JR</u>	<u>1101 N ILLINOIS ST</u>
Date Collected: <u>2/10/21</u>	<u>HARRISBURG, AR</u>
Mobile:	Email:
Note:	

Analysis Type		Analysis Description	Turnaround	Accepted Media Types
Spore Trap	S	Identification & Enumeration of Fungal Spores	24 Hour	Air Cassettes, Impact Slides
	S+	Spore Trap Analysis with Dander, Fiber, and Pollen counts	24 Hour	Air Cassettes, Impact Slides
Direct ID	D	ID & Semi-Quantative Enumeration of spores and mycelium	24 Hour	Bio-Tape, Tape, Swab, Bulk, Agar Plate
	D+	Direct Analysis with Fully Quantitative spore count	24 Hour	Bio-Tape, Tape, Swab, Bulk, Agar Plate
Culture	C1	Identification & Enumeration of Mold only	7 Day	Air Plate, Agar Plate, Swab, Bulk
	C2	Identification & Enumeration of Bacteria only	4 Day	Air Plate, Agar Plate, Swab, Bulk
	C3	Identification & Enumeration of Mold and Bacteria	7 Day	Air Plate, Agar Plate, Swab, Bulk
	C5	Coliform Screen for Sewage Bacteria	2 Day	Agar Plate, Swab, Bulk
Particle	TPA	Total Particulate Analysis, ID & Count (Does Not Include Mold)	24 Hour	Air Cassettes, Impact Slides, Bio-Tape

#	Number	Sample	Analysis	Volume	Notes
1	FT01-01	FLOOR TILE/MASTIC	PLM BULK		5-DAY
2	FT01-02	FLOOR TILE/MASTIC			
3	FT02-03	FLOOR TILE/MASTIC			
4	FT02-04	FLOOR TILE/MASTIC			
5	FT03-05	FLOOR TILE/MASTIC			
6	FT03-06	FLOOR TILE/MASTIC			
7	FT04-07	FLOOR TILE/MASTIC			
8	FT04-08	FLOOR TILE/MASTIC			
9	CB01-09	MASTIC			
10	CB01-10	MASTIC			
11	CB02-11	MASTIC			
12	CB02-12	MASTIC			
13	CB03-13	MASTIC			
14	CB03-14	MASTIC			
15	SR01-15	DRY WALL / JOINT COMPOUND			
16	SR01-16	DRY WALL / JOINT COMPOUND			

Released by: <u>[Signature]</u>	Date: <u>2/10/21</u>	Received By: <u>[Signature]</u>	Date: <u>2-11-21</u>
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Company: COMMONWEALTH ENVIRONMENTAL
Address: 648 WANDELL ST
LEXINGTON, VA 24450

N

SHIP: FEDEX - BOX 50
DATE: 02-11-2021



8160 4411 2625



Job Number: <u>L2521</u>	Job Name:	Mobile:	Email:
Collector: <u>JR</u>	<u>1101 N ILLINOIS ST</u>		
Date Collected: <u>2/10/21</u>	<u>HARRISBURG, AR</u>	Note:	

Analysis Type		Analysis Description	Turnaround	Accepted Media Types
Spore Trap	S	Identification & Enumeration of Fungal Spores	24 Hour	Air Cassettes, Impact Slides
	S+	Spore Trap Analysis with Dander, Fiber, and Pollen counts	24 Hour	Air Cassettes, Impact Slides
Direct ID	D	ID & Semi-Quantative Enumeration of spores and mycelium	24 Hour	Bio-Tape, Tape, Swab, Bulk, Agar Plate
	D+	Direct Analysis with Fully Quantitative spore count	24 Hour	Bio-Tape, Tape, Swab, Bulk, Agar Plate
Culture	C1	Identification & Enumeration of Mold only	7 Day	Air Plate, Agar Plate, Swab, Bulk
	C2	Identification & Enumeration of Bacteria only	4 Day	Air Plate, Agar Plate, Swab, Bulk
	C3	Identification & Enumeration of Mold and Bacteria	7 Day	Air Plate, Agar Plate, Swab, Bulk
	C5	Coliform Screen for Sewage Bacteria	2 Day	Agar Plate, Swab, Bulk
Particle	TPA	Total Particulate Analysis, ID & Count (Does Not Include Mold)	24 Hour	Air Cassettes, Impact Slides, Bio-Tape

#	Number	Sample	Analysis	Volume	Notes
1	<u>CT01-17</u>	<u>CEILING TILE</u>	<u>PCM Bulk</u>		<u>S-DAY</u>
2	<u>CT01-18</u>	<u>CEILING TILE</u>	<u>↓</u>		<u>↓</u>
3	<u>CT02-19</u>	<u>CEILING TILE</u>			
4	<u>CT02-20</u>	<u>CEILING TILE</u>			
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					

Released by: <u>[Signature]</u>	Date: <u>2/10/21</u>	Received By: <u>ML</u>	Date: <u>2.11.21</u>
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ATTACHMENT C

**ARKANSAS LICENSE /
CERTIFICATION**

Arkansas Department of Environmental Quality

JOSHUA A. ROBERSON

having satisfied the requirements necessary to meet the provisions of AHERA/ASHARA under TSCA Title II and the Arkansas Pollution Control and Ecology Commission's Regulation 21 and is hereby certified in the State of Arkansas in the discipline(s) of Asbestos

Discipline	Issue Date	Effective Date	Expiration Date
Air Monitor	10/14/2020	10/28/2020	10/31/2021
Contractor Supervisor	10/14/2020	10/28/2020	10/31/2021
Inspector	10/15/2020	10/28/2020	10/31/2021
Project Designer	08/07/2020	10/28/2020	08/31/2021



Certification Number: **015183**

Becky W. Keogh
Becky W. Keogh
ADEQ Director