

# STC

Environmental Services Inc.  
Geologists and Environmental Scientists

4754 RESEARCH DRIVE

SAN ANTONIO, TEXAS 78240

Office (210) 696-6286 / FAX (210) 696-8761

August 26, 2019

Dr. Jack Rountree  
MJ Holdings  
10792 Oakland Road  
San Antonio, Texas 78240

Re: Limited Asbestos Survey  
2219 South Flores Street  
San Antonio, Texas 78204  
STC Project No. 19391

Dr. Rountree,

On August 22, 2019, a limited asbestos survey was conducted at the above-referenced location by a state-licensed asbestos inspector. This asbestos survey was conducted in conjunction with a real estate transaction associated with the property located at the above-referenced address.

In summary, eighteen (18) samples were collected. Three (3) samples of exterior green siding (green transite) indicated a concentration of asbestos greater than one (1) percent. The remaining fifteen samples did not indicate the presence of asbestos. Additional details regarding the survey are presented below.

## PROJECT INFORMATION

A limited, pre-renovation, asbestos-containing-materials survey was accomplished by Mr. Andrew Herrera, an EPA-accredited and Texas-licensed asbestos inspector (Texas State License Number 60-3729, expiration November 08, 2020). This survey was conducted in accordance with Texas Department of State Health Services (TDSHS) Texas Asbestos Health Protection Rules (TAHPR), March 2003, which requires a minimum of three (3) bulk samples for each homogeneous area to rebut the presence of asbestos.

The area surveyed consisted of the interior and exterior of the building located at 2219 South Flores Street in San Antonio, Texas. The interior of the space was finished-out with vinyl floor tile, sheetrock walls, and sheetrock ceilings. The exterior of the space was finished-out with exterior stucco, exterior green siding, and exterior beige siding.

## ASBESTOS-CONTAINING MATERIALS SURVEY PROTOCOL

The purpose of the asbestos survey is to attempt to identify asbestos-containing materials. In general, the Environmental Protection Agency (EPA) classifies ACM into three categories: **Surfacing**, which includes sprayed-on or troweled-on materials; **Thermal**, which includes insulation and materials associated with heating, hot/cold water systems and HVAC systems; and **Miscellaneous**, which includes ceiling and floor tiles, roofing materials and all other materials which do not fall into the two previous categories. In addition, identified ACM material is further defined as "**Friable**" or "**Non-friable**". "Friable" material is defined as materials which, when dry, can easily be pulverized, crushed or reduced to powder by hand pressure. "Non-Friable" material is defined as those materials containing asbestos that are firmly-bound by a matrix such as plastic, cement, etc., that, if handled carefully, will not become friable. The EPA defines asbestos containing material (ACM) as any material or product, which contains **greater** than 1% asbestos.

Prior to obtaining any bulk samples, the areas of homogenous material construction are identified to assure that each area is included in the sampling plan. A "homogeneous area" indicates an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture that is used throughout the facility during construction. A minimum of three (3) representative samples are then obtained from each area.

Materials not sampled during this inspection included concrete materials, ceramic tile, wood framing, carpet, PVC pipe and hidden and inaccessible components.

## RESULTS OF THE INSPECTION

The following materials were identified and sampled:

- 12"x12" brown vinyl floor tile with yellow mastic
- White drywall and joint compound (Interior Demising Wall)
- White drywall and joint compound (Perimeter Walls)
- Exterior stucco
- Exterior green siding (Green Transite – Second Layer)
- Exterior beige siding (Beige Non-Fibrous Material – Top Layer)

A total of eighteen (18) bulk samples were collected and immediately placed in plastic bags, sealed, and assigned a unique number for transport to a Texas-licensed asbestos laboratory for analysis. EMLab P&K (TDSHS 30-0396) in Ft. Lauderdale, Florida was the selected laboratory for analysis.

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Based on the testing, one (1) asbestos-containing material was identified. The following materials will require abatement by a licensed asbestos abatement contractor prior to renovation activities that will disturb the materials:

- Exterior green siding (Green Transite – Second Layer) – 20% chrysotile — Quantity unknown, potentially around the entire exterior of the building

Fifteen (15) samples did not indicate the presence of asbestos. A complete copy of the analytical laboratory report is included as an attachment to this letter.

### OTHER INFORMATION

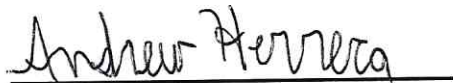
Should renovation and/or demolition activities encounter any other suspected asbestos-containing material not accessible or excluded at the time of our survey, a licensed asbestos inspector should be consulted to determine if sampling is required.

It should be noted that this survey did not include the roof. Therefore, it was not sampled. Exposed exterior beige siding is not asbestos-containing. However, the exterior green siding is asbestos-containing and located underneath the exterior beige siding. Extent of the exterior green siding is unknown. For these reasons this survey is considered limited.

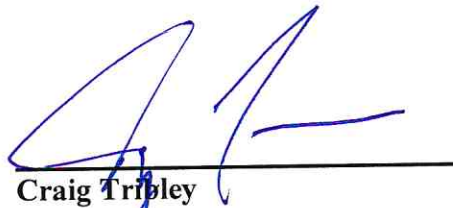
It should also be noted that, in accordance with Texas Department of State Health Services (TDSHS) Texas Asbestos Health Protection Rules (TAHPR), March 2003, Chapter 295.34 Asbestos Management in Facilities and Public Buildings, the building owner is responsible for collecting Material Safety Data Sheets (MSDS) for all building materials used during the renovation. This is to ensure that asbestos-containing materials are not installed during the renovation activities. The building owner is encouraged to maintain these MSD sheets for use during future improvements.

STC Environmental Services, Inc. appreciates the opportunity to provide our professional services to you. If you have any questions, please contact us at (210) 696-6288.

Respectfully,



**Andrew Herrera**  
Environmental Technician  
Asbestos Inspector - TDSHS# 60-3586



**Craig Tribbley**  
President  
Asbestos Consultant - TDSHS#10-5701

**Attachment:** Analytical Laboratory Results and Chain of Custody Records

Report for:

**Craig Tribley**  
**STC Environmental Services Inc.**  
4754 Research Dr  
San Antonio, TX 78240

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Regarding: Project: 19391; 2219 S Flores St  
EML ID: 2236928

Approved by:



Approved Signatory  
Balu Krishnan

Dates of Analysis:  
Asbestos PLM: 08-26-2019

Service SOPs: Asbestos PLM (EPA 40CFR App E to Sub E of Part 763 & EPA METHOD 600/R-93-116, SOP EM-AS-S-1267)

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All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the samples as received. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data for sample results with >1% asbestos concentration can be provided when requested.

Eurofins EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

Client: STC Environmental Services Inc.  
C/O: Craig Tribley  
Re: 19391; 2219 S Flores StDate of Sampling: 08-22-2019  
Date of Receipt: 08-23-2019  
Date of Report: 08-26-2019**ASBESTOS PLM REPORT****Total Samples Submitted:** 18**Total Samples Analyzed:** 18**Total Samples with Layer Asbestos Content > 1%:** 3**Location: 1A, 12"X12" Brown Vinyl Floor Tile with Yellow Mastic (South Side)**

Lab ID-Version‡: 10638100-1

Sample Layers	Asbestos Content
Brown Floor Tile	ND
Yellow Mastic	ND
<b>Sample Composite Homogeneity:</b>	Good

**Location: 1B, 12"X12" Brown Vinyl Floor Tile with Yellow Mastic (South Side)**

Lab ID-Version‡: 10638101-1

Sample Layers	Asbestos Content
Brown Floor Tile	ND
Yellow Mastic	ND
<b>Sample Composite Homogeneity:</b>	Good

**Location: 1C, 12"X12" Brown Vinyl Floor Tile with Yellow Mastic (North Side)**

Lab ID-Version‡: 10638102-1

Sample Layers	Asbestos Content
Brown Floor Tile	ND
Yellow Mastic	ND
<b>Sample Composite Homogeneity:</b>	Good

**Location: 2A, White Drywall and Joint Compound (Demising Wall- North Space)**

Lab ID-Version‡: 10638103-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
<b>Composite Non-Asbestos Content:</b>	15% Cellulose 1% Glass Fibers
<b>Sample Composite Homogeneity:</b>	Good

The test report shall not be reproduced except in full, without written approval of the laboratory. The report must not be used by the client to claim product certification, approval, or endorsement by any agency of the federal government. Eurofins EMLab P&K reserves the right to dispose of all samples after a period of thirty (30) days, according to all state and federal guidelines, unless otherwise specified.

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.

‡ A "Version" indicated by "-x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

Client: STC Environmental Services Inc.  
C/O: Craig Tribley  
Re: 19391; 2219 S Flores StDate of Sampling: 08-22-2019  
Date of Receipt: 08-23-2019  
Date of Report: 08-26-2019**ASBESTOS PLM REPORT****Location: 2B, White Drywall and Joint Compound (Demising Wall- North Space)**

Lab ID-Version‡: 10638104-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
<b>Composite Non-Asbestos Content:</b>	15% Cellulose 1% Glass Fibers
<b>Sample Composite Homogeneity:</b>	Good

**Location: 2C, White Drywall and Joint Compound (Demising Wall- North Space)**

Lab ID-Version‡: 10638105-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
<b>Composite Non-Asbestos Content:</b>	15% Cellulose 1% Glass Fibers
<b>Sample Composite Homogeneity:</b>	Good

**Location: 3A, White Drywall and Joint Compound (Northern Perimeter Wall- North Space)**

Lab ID-Version‡: 10638106-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Cream Tape	ND
<b>Composite Non-Asbestos Content:</b>	20% Cellulose
<b>Sample Composite Homogeneity:</b>	Moderate

**Location: 3B, White Drywall and Joint Compound (Northern Perimeter Wall- North Space)**

Lab ID-Version‡: 10638107-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
Cream Tape	ND
<b>Composite Non-Asbestos Content:</b>	20% Cellulose
<b>Sample Composite Homogeneity:</b>	Moderate

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Client: STC Environmental Services Inc.  
C/O: Craig Tribley  
Re: 19391; 2219 S Flores St

Date of Sampling: 08-22-2019  
Date of Receipt: 08-23-2019  
Date of Report: 08-26-2019

**ASBESTOS PLM REPORT**

**Location: 3C, White Drywall and Joint Compound (Western Perimeter Wall- South Space)**

Lab ID-Version‡: 10638108-1

Sample Layers	Asbestos Content
White Drywall with Brown Paper	ND
White Joint Compound	ND
<b>Composite Non-Asbestos Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Moderate

**Location: 4A, Exterior Stucco**

Lab ID-Version‡: 10638109-1

Sample Layers	Asbestos Content
Gray Stucco with Paint	ND
<b>Sample Composite Homogeneity:</b>	Good

**Location: 4B, Exterior Stucco**

Lab ID-Version‡: 10638110-1

Sample Layers	Asbestos Content
Gray Stucco with Paint	ND
<b>Sample Composite Homogeneity:</b>	Good

**Location: 4C, Exterior Stucco**

Lab ID-Version‡: 10638111-1

Sample Layers	Asbestos Content
Gray Stucco with Paint	ND
<b>Sample Composite Homogeneity:</b>	Good

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Client: STC Environmental Services Inc.  
C/O: Craig Tribley  
Re: 19391; 2219 S Flores St

Date of Sampling: 08-22-2019  
Date of Receipt: 08-23-2019  
Date of Report: 08-26-2019

**ASBESTOS PLM REPORT****Location: 5A, Exterior Green Siding (Second Layer)**

Lab ID-Version‡: 10638112-1

Sample Layers	Asbestos Content
Green Transite (Siding)	20% Chrysotile
<b>Sample Composite Homogeneity:</b>	Good

**Location: 5B, Exterior Green Siding (Second Layer)**

Lab ID-Version‡: 10638113-1

Sample Layers	Asbestos Content
Green Transite (Siding)	20% Chrysotile
<b>Sample Composite Homogeneity:</b>	Good

**Location: 5C, Exterior Green Siding (Second Layer)**

Lab ID-Version‡: 10638114-1

Sample Layers	Asbestos Content
Green Transite (Siding)	20% Chrysotile
<b>Sample Composite Homogeneity:</b>	Good

**Location: 6A, Exterior Beige Siding (Top Layer)**

Lab ID-Version‡: 10638115-1

Sample Layers	Asbestos Content
Beige Non-Fibrous Material (Siding)	ND
<b>Composite Non-Asbestos Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

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Client: STC Environmental Services Inc.  
C/O: Craig Tribley  
Re: 19391; 2219 S Flores St

Date of Sampling: 08-22-2019  
Date of Receipt: 08-23-2019  
Date of Report: 08-26-2019

**ASBESTOS PLM REPORT****Location: 6B, Exterior Beige Siding (Top Layer)**

Lab ID-Version‡: 10638116-1

Sample Layers	Asbestos Content
Beige Non-Fibrous Material (Siding)	ND
<b>Composite Non-Asbestos Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

**Location: 6C, Exterior Beige Siding (Top Layer)**

Lab ID-Version‡: 10638117-1

Sample Layers	Asbestos Content
Beige Non-Fibrous Material (Siding)	ND
<b>Composite Non-Asbestos Content:</b>	10% Cellulose
<b>Sample Composite Homogeneity:</b>	Good

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San Bruno, CA: 1150 Bayhill Drive, #100, San Bruno, CA 94066 \* (866) 888-6653

WEATHER		Fog	Rain	Snow	Wind	Clear
LEVEL	None					
	Light					
	Moderate					
	Heavy					



002236928

## CONTACT INFORMATION

Company: <b>STC Environmental</b>	Address: <b>4754 Research Dr., San Antonio, TX 78240</b>
Contact: <b>Craig Tribley</b>	Special Instructions:
Phone: <b>210-696-6288</b>	Please send results to: <a href="mailto:ctribley@stcas.com">ctribley@stcas.com</a> ; <a href="mailto:ahemera@stces.com">ahemera@stces.com</a>

## PROJECT INFORMATION


Project ID: 19391	
Project Desc.: 2219 S. Flores St.	
Project	Sampling
Zip Code: 78204	Date & Time: 8/22/19
PO Number: 0668-19	

## TURN AROUND TIME CODES: (STAT)

**STD** - Standard (DEFAULT)  
**ND** - Next Business Day  
**SD** - Same Business Day  
**WH** - Weekend/Holiday

Papers received after 2 p.m. on  
 weekdays will be considered  
 for the next business day.  
 Please alert us in advance of  
 week end deadlines.

Sample ID	Description	Sample type (Bulk)	TAI (HBB, HADD, etc.)	Total Volume/Area (as applicable)	NOTES (Time of day, Temp, etc.)
1A,1B	12"x12" brown vinyl floor tile with yellow mastic (South Side)	B	STD		
1C	12"x12" brown vinyl floor tile with yellow mastic (North Side)				
2A,2B,2C	White drywall and joint compound (Demising Wall - North Space)				
3A,3B	White drywall and joint compound (Northern Perimeter Wall - North Space)				
3C	White drywall and joint compound (Western Perimeter Wall - South Space)				
4A,4B,4C	Exterior stucco				
5A,5B,5C	Exterior green siding (Second Layer)				
6A,6B,6C	Exterior beige siding (Top Layer)				

SAMPLE TYPE CODES				RELINQUISHED BY	DATE & TIME	RECEIVED BY	DATE & TIME
BC - BioCassette	ST - Spore Trap: Zefon,	T - Tape	D - Dust	Andrew Nicora	8/22/19 11:15		8/23/19 10:29
A15 - Andersen	Allergenco, Burkard...	SW - Swab	SO - Soil				
SAS - Surface Air Sampler	P - Potable Water	<input checked="" type="radio"/> B - Bulk					
CP - Contact Plate	NP - Non-Potable Water	O - Other:					

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