



Environmental Survey and Assessment for Asbestos Containing Materials

Project:

Work Area at Tallaboa Industrial Park (formerly PR Olefins)
Road 127, Peñuelas, Puerto Rico
(Work Plan Approved by EPA, Reference No. CAA-02-2014-1009)

Prepared by:

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Prepared for:

Homeca Recycling Center Co. Inc
Ponce PR.

January 29, 2019

Table of Contents

| | Page |
|--|---------|
| 1.0 Introduction | 2 |
| 2.0 General Background | 3-4 |
| 2.1 National Emission Standards for Hazardous Air Pollutants (NESHAP) | 4-6 |
| 3.0 Project Identification/Description | 6 |
| 4.0 Methods of Building Inspection | 6-8 |
| 5.0 Results Summary | 8-11 |
| 6.0 Conclusions | 12 |
| Appendix | |
| Appendix I. Credentials | 13-16 |
| Appendix II. Physical Hazard Assessment | 17-40 |
| Appendix III. Analytical Results | 41-66 |
| Appendix IV. Representative Photos and General View | 67-139 |
| Appendix V. Schematic Distribution of ACM Sampling Points | 140-144 |

1.0 Introduction

On December 18 & 19, 2018, a survey and Assessment for Asbestos Containing Material (ACM) was conducted by Best Environmental Consultants, Inc. as requested by Homeca Recycling Center Co., Inc, (Homeca) on part of former Puerto Rico Olefins facilities located at Road 127, Peñuelas, Puerto Rico. The area assessed and surveyed is the work area defined in the document titled “Work Plan to Comply with Compliance Order CAA-02-2014-1009”. dated September 18, 2015(Work Plan). This Work Plan was approved by the U.S. Environmental Protection Agency (EPA) on October 2, 2015.

The scope of the survey included sampling and physical assessments, if applicable, of Suspect Asbestos Containing Materials (SACM) from the specific structures located inside the work area to identify materials that contain asbestos fibers above allowable levels that had been promulgated to define regulated Asbestos Containing Materials (ACM). This Environmental Survey and Assessment Report (Report) will be used by Homeca for the execution of the remaining phases of the Work Plan. The survey and assessment were conducted by Carlos E. Ocasio Feliciano, an AHERA / PREQB Certified Asbestos’ Building Inspector (License: ASB-0918-0666-SI). Representative of Best Environmental Consultants, Inc. (Credentials are included in Appendix I).

2.0 General Background

Asbestos was used in the construction 1900 to 1989. It is still being used today in various products. The health effects of asbestos have been studied since the 1930's. More health studies have been conducted in asbestos than any other natural substance. The mere presence of ACM does not necessarily constitute a health hazard. However, when these materials become disturbed from building renovation, maintenance, or other every day activities that allow fibers to be released into the environment, a potential hazard does exist.

The relationship between exposure level and health risk is very complex. Although this relationship is not completely understood, asbestos exposure has been associated with various types of lung diseases including a debilitating lung disease called Asbestosis; a rare cancer of chest called Mesothelioma; and cancers of the esophagus, stomach, colon and other organs. Asbestosis is not fatal; it is, however, incurable. One who has it, cannot breathe easily and physical activity becomes limited. Mesothelioma is 100% fatal, as there is no cure. These diseases can be directly linked to the mineral of asbestos in the particle form that can be found in the lining of the lung and stomach, since the body cannot absorb these minerals. Tests have determined that asbestos can cause cancer, but scientists disagree on the amount of asbestos fibers that must be inhaled to cause cancer. The nose filters out all visible particles. Therefore, only the microscopic fibers are the ones that cause the problem.



Studies indicate different health effect resulting from exposure to chrysotile asbestos versus exposure to amphibole form of asbestos. The latter, which include tremolite, amosite, actinolite, anthophyllite and crocidolite have more significant health impact than chrysotile. Some scientists' studies conclude that the dimensions of the fiber determine which ones enter in the lung area, resulting in cancer. Long, thin fibers, greater than 8 microns (μm) in length and less than 0.25 microns in diameter show the highest potential of cancer development.

2.1 National Emission Standards for Hazardous Air Pollutants (NESHAP)

The EPA's rules concerning the application, removal and disposal of ACM, as well as manufacturing, spraying and fabricating of ACM were issued under the asbestos NESHAP regulation (U.S. EPA National Emission Standards for Hazardous Air Pollutants, 40 CFR 61 Subpart M, October 30, 1987). The asbestos NESHAP regulation governs asbestos demolition and renovation projects in all facilities. The NESHAP rule usually requires owners or operators to have all friable ACM removed before the building is demolished and may require its removal before renovation. If friable ACM shall be disturbed, the NESHAP rule may require appropriate work practice, or procedures for emission control. The rules state that any ACM, which may become friable, poses a potential hazard that should be addressed.

A revised NESHAP ruling was released on November 20, 1990, (Effective on February 20, 1991), which includes the responsibility of the owner, or operator, to "prior to the

commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II non-friable ACM". (40 CFR, Part 61, National Emission Standards for Hazardous Air Pollutants, Asbestos NESHAP Revision, Final Rule, November 20, 1990).

The Environmental Quality Board of Puerto Rico (PREQB) requires inspecting the presence of ACM prior to buildings demolitions, in accordance with Rule 422 of the PREQB's Regulation for the Control of Atmospheric Pollution (RCAP) as amended. Also Rule 644 of the PREQB's Regulations for the Management of Hazardous Solid Wastes Regulation requires submitting evidence of the proper the asbestos tacking and disposal.

Abatement, as defined by EPA and EQB, means any set of measures designed to eliminate asbestos hazards permanently. The personnel providing the abatement services must have to be trained in accordance with EQB accreditation/ certification requirements. The product manufacturer and / or contractor must warrant abatement methods to last a minimum of 20 years, or these methods must have a design life of at least 20 years. Abatement activities may include, but are not necessarily limited to: the onsite or offsite removal of asbestos containing materials; the replacement of components or fixtures containing asbestos; the permanent enclosure of ACBM with construction materials mechanically- fastened to the substrate; the encapsulation of ACBM with specially designed products; of the removal or permanent covering (rigid barriers)

of soil with asbestos hazards. If the enclosure or encapsulation is conducted as an abatement method, the ACM remains on the property, so ongoing ACM maintenance is required as defined by EPA in 40CFR 763.

3.0 Project Identification/ Description

The survey and assessment project consisted of the inspection of remaining distillation towers and associated equipment remaining inside the work area former Puerto Rico Olefins, Peñuelas Puerto Rico: these towers and equipment constructed on metal and on top of concrete slabs located at the Work Area. The project consists of sampling and analyzing of any Suspect Asbestos Containing Material (SACM) on these distillation towers and equipment. A total of 60 samples were collected as a part of this project, as a result of the inspection performed.

4.0 Methods of Inspection

The visual inspection was conducted first verifying if ACM was present, and then if applicable, the condition of ACM in that location and the potential for material disturbance. The assessment scheme followed the recommendations by EPA as a result of the Asbestos Hazard Emergency Response Act and outlined in 40 CFR Part 763.88 dated October 30, 1987 and amended by 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (Asbestos NESHAP Revision, Final Rule, November 20, 1990). The functional space inside the



Work Area was visited and visually inspected to identify the location of any suspected ACM. An assessment was then made of the friability of suspected ACM by touching the material to determine if it could be pulverized, crumbled or reduced to powder by hand pressure. Upon completion of functional space investigation, bulk sample were collected and grouped into “Homogeneous Sampling Areas”, i.e. areas which are uniform by color, texture, construction/application date and/or general appearance that were categorized as follows: (1) Category I, non-friable asbestos containing materials (ACM). This includes asbestos containing packing’s, gaskets, resilient floor covering and asphalt roofing products containing more than 1% asbestos. (2) Category II, non-friable ACM. This includes any materials, excluding Category I non-friable ACM containing more than 1% asbestos, that when dry cannot be crumbled, pulverized or reduced to powder by hand pressure: and (3) Friable asbestos materials. This includes any material containing more than 1% asbestos that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure.

Physical Hazard Assessment (Appendix II) was performed based on AHERA regulations to determine the physical conditions of the suspected ACM. This protocol provides separate analysis for three types of materials; surfacing, thermal insulation and miscellaneous. However, this protocol does not provide a means for relative ranking of individual hazards within the category. Therefore, a separate analysis was performed as to assess hazard ranking which could be used for this type of material. The hazard assessment combines the level of potential disturbance with the current condition of ACM to indicate overall hazard potential. The rankings

of potential hazards range from 1-most hazardous to 7-least hazardous. The highest rank is reserved for ACM, which is significantly damaged. A review of the definition of “significant damage” reveals that the definitions are designed to identify ACBM, which is so extensively damaged or deteriorated, that it requires immediate corrective action. Hazard rank 2-4 reflects ACBM, which is “damaged” as defined by AHERA, with rank 2 indicating a “potential for significant damage” and rank 3 indicating a “potential for damage”. Hazard ranks 5-7 are reserved for ACBM currently in good condition, but with a range in the likelihood for future disturbance.

5.0 Results Summary

As a result of the inspection, ACM was defined in the distillation towers and equipment present within the Work Area. An inventory of the structures and equipment (including piping systems) in the Work Area that contain suspected ACM is included in the Table 1.0. The table also include the amount and type of ACM, together with a description of its state/condition in accordance to NESHAP regulation. The total amount of the ACM present within the Work Area at the moment the inspection was completed is estimated to add up to 31, 680 square feet. The location of the ACM and amounts estimated on towers/equipment, soil and concrete surfaces is included in Appendix V. Schematic Distribution of ACM Sampling Points.

Bulk samples were collected of all suspected ACM and analytical results for those that exceeded the 1% concentration of asbestos fibers (Positive Results) are present on the following table

Table 1.0 Summary of Positive Results

| Sample ID | Location | Classification of Material | % of Asbestos |
|----------------|--|----------------------------|----------------|
| 323-121819-01 | Tower 1 South Side | TSI | 10% Chrysotile |
| 323-121819-02 | Tower 1 East Side | TSI | 10% Chrysotile |
| 323-121819-03 | Tower 1 North Side | TSI | 10% Chrysotile |
| 323-121819-04 | Tower 2 South Side | TSI | 20% Chrysotile |
| 323-121819-05 | Tower 2 East Side | TSI | 15% Chrysotile |
| 323-121819-06 | Tower 2, 12'' ϕ Pipe, Northeast Side | TSI | 80% Amosite |
| 323-121819-07 | Tower 2, North Side | TSI | 20% Chrysotile |
| 323-121819-11 | Tower 4, North Side | TSI | 20% Chrysotile |
| 323-121819-12 | Tower 4 South Side | TSI | 20% Chrysotile |
| 323-121819-13 | Tower 4 Pipe 10'' ϕ , | TSI | 80% Amosite |
| 323-121819-14 | Tower 4 Southwest Side | TSI | 20% Chrysotile |
| 323-121819-15 | Tower 5 North Side | TSI | 15% Chrysotile |
| 323-121819-16 | Tower 5 East Side | TSI | 20% Chrysotile |
| 323-121819-17 | Tower 5 South Side | TSI | 20% Chrysotile |
| 323-121819-18 | Tower 6 North Side | TSI | 20% Chrysotile |
| 323-121819-20 | Tower 6 South Side | TSI | 20% Chrysotile |
| 323-121819-21 | Tank 1 North Side | TSI | 20% Chrysotile |
| 323-121819-22 | Tank 1 Northeast Side | TSI | 20% Chrysotile |
| 323-121819-23 | Tank 1 South Side | TSI | 20% Chrysotile |
| 323-121919-24 | Tower 7 South Side | TSI | 20% Chrysotile |
| 323-121919-25 | Tower 7 North Side | TSI | 80% Amosite |
| 323-121919-28 | Tank 2 North Side | TSI | 20% Chrysotile |
| 323-121919-28A | Tank 2, 10'' ϕ East Side | TSI | 80% Amosite |
| 323-121919-28B | Tank 2, 10'' ϕ East Side | TSI | 75% Amosite |
| 323-121919-29 | Tank 2, South Side | TSI | None Detected |
| 323-121919-30 | Tank 3 South Side | TSI | 20% Chrysotile |
| 323-121919-31 | Tank 3 North Side | TSI | 20% Chrysotile |
| 323-121919-32 | Tank 4 North Side | TSI | 20% Chrysotile |
| 323-121919-33 | Tank 4 West Side | TSI | 20% Chrysotile |
| 323-121819-34 | Tower 7 Interior Pipe 24'' ϕ , Southeast Side | TSI | 20% Chrysotile |

| Sample ID | Location | Classification of Material | % of Asbestos |
|---------------|--|----------------------------|----------------|
| 323-121919-35 | Tank 2 North Side | TSI | 20% Chrysotile |
| 323-121919-39 | Tank 6 South Side | TSI | 20% Chrysotile |
| 323-121919-40 | Tank 6 West Side | TSI | 20% Chrysotile |
| 323-121919-41 | Tank 6 North Side | TSI | 20% Chrysotile |
| 323-121919-42 | Tower 9 South Side | TSI | 20% Chrysotile |
| 323-121919-43 | Tower 9 North Side | TSI | 20% Chrysotile |
| 323-121919-44 | Tower 9 Southeast Side | TSI | 20% Chrysotile |
| 323-121919-45 | Tower 10 Northeast Side | TSI | 20% Chrysotile |
| 323-121919-46 | Tower 10, 8'' ϕ Pipe, Northeast | TSI | 80% Amosite |
| 323-121919-47 | Tower 10, Northeast Side | TSI | 80% Amosite |
| 323-121919-48 | Tower 11, Northeast Side | TSI | 20% Chrysotile |
| 323-121919-49 | Tower 11, South Side | TSI | 20% Chrysotile |
| 323-121919-50 | Tower 11, North Side | TSI | 20% Chrysotile |
| 323-121919-51 | Tower 13, Pipe 6'' ϕ , Front Side | TSI | 75% Amosite |
| 323-121919-52 | Tower 13, Pipe 6'' ϕ , Front Side | TSI | 75% Amosite |
| 323-121919-54 | Tower 12, South Side | TSI | 20% Chrysotile |
| 323-121919-55 | Tower 12, North Side | TSI | 20% Chrysotile |
| 323-121919-56 | Tower 12, West Side | TSI | 20% Chrysotile |
| 323-121919-57 | Tower 13, 6'' ϕ , North Side | TSI | 80% Amosite |
| 323-121919-58 | Tower 13, West Side | TSI | 20% Chrysotile |
| 323-121919-59 | Tower 13, South Side | TSI | 20% Chrysotile |
| 323-121919-60 | Tank 5, South Side | TSI | 10% Chrysotile |
| 323-121919-61 | Tank 5, North Side | TSI | 20% Chrysotile |
| 323-121919-62 | Tank 6, Northeast Side | TSI | 20% Chrysotile |
| 323-121919-63 | Tank 6, North Side | TSI | 15% Chrysotile |
| 323-121919-64 | Tank 7, Northeast Side | TSI | 15% Chrysotile |
| 323-121919-65 | Tank 7, North Side | TSI | 15% Chrysotile |
| 323-121919-66 | Fin Fan Air Cooler, 12'' ϕ Pipe | TSI | 75% Amosite |
| 323-121919-67 | Fin Fan Air Cooler, 10'' ϕ Pipe | TSI | 75% Amosite |
| 323-121919-68 | Boiler #6, Fireproofing Cloth, Between Metal Walls | Miscellaneous | 80% Chrysotile |

Note: Refer to "Table 2: Approximately Asbestos Containing Materials (ACM) Quantities per Tower or Equipment" in the next page.



Table 2: Approximate Asbesto Containing Materials (ACM) Quantities per Tower or Equipment

| Tower/Equipment | Approximate Quantity |
|-----------------|----------------------|
| Tower 1 | 3,800 square feet |
| Tower 2 | 2,000 square feet |
| Tower 3 | 1,280 square feet |
| Tower 4 | 2,600 square feet |
| Tower 5 | 2,000 square feet |
| Tower 6 | 2,400 square feet |
| Tower 7 | 15,200 square feet |
| Tower 8 | 2,400 square feet |
| Tower 9 | 4,000 square feet |
| Tower 10 | 6,800 square feet |
| Tower 11 | 1,600 square feet |
| Tower 12 | 900 square feet |
| Tower 13 | 1,400 square feet |
| Tank 1 | 500 square feet |
| Tank 2 | 500 square feet |
| Tank 3 | 500 square feet |
| Tank 4 | 500 square feet |
| Tank 5 | 300 square feet |
| Tank 6 | 300 square feet |
| Tank 7 | 300 square feet |



6.0 Conclusion

Asbestos containing materials were found at the time this inspection was performed on towers/ equipment present inside the work area. Their location, amount and conditions are summarized in this report. Further demolition work within the work area shall include the proper abatement of the ACM surveyed and assessed in this report.

I certified that I conducted this survey and assessment following all applicable regulations and that the content of this report is true and accurate to the best of my ability This report should be kept by the owner and any additional possible owners during the life of the structures.



Carlos E. Ocasio-Feliciano
PREQB Asbestos Inspector
ASB-0918-0666-SI

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

APPENDIX I

CREDENTIALS

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

CERTIFIED ACM INSPECTOR BY THE ENVIRONMENTAL QUALITY
BOARD OF PUERTO RICO

| | |
|-------------------------|--|
| FOIA 6 | TARJETA DE REGISTRO LA REMOCION PARA DE ASBESTO |
| | Esta tarjeta autoriza a: <i>Carlos E. Ocasio Feliciano</i> |
| | Inspector Trabajar en la remoción de asbesto en P.R. Esta persona NO es un empleado, ni un representante de la Junta. |
| ASB-0918-0666-SI |  Firma Autorizada Junta de Calidad Ambiental |
| Número de Registro | |
| 6-sept-2019 | |
| Fecha de vencimiento | |



Best
Environmental Consultants Inc.

14-148

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 101165-0

International Asbestos Testing Laboratories
Mt. Laurel, NJ

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

Asbestos Fiber Analysis

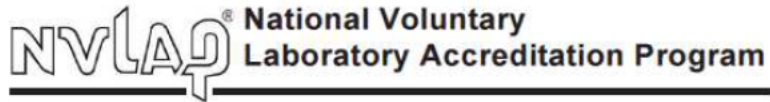
*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2005.
This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
management system (refer to joint ISO-ILAC-IAF Communiqué dated January 2009).*

2018-07-01 through 2019-06-30
Effective Dates




For the National Voluntary Laboratory Accreditation Program

JANUARY 29, 2019



SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

International Asbestos Testing Laboratories

9000 Commerce Parkway
Suite B
Mt. Laurel, NJ 08054
Mr. Frank E. Ehrenfeld III
Phone: 856-231-9449 Fax: 856-231-9818
Email: frankehrenfeld@iatl.com
<http://www.iatl.com>

ASBESTOS FIBER ANALYSIS

NVLAP LAB CODE 101165-0

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

Effective 2018-07-01 through 2019-06-30

Page 1 of 1

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

APPENDIX II

PHYSICAL HAZARD ASSESSMENT

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 18, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: IATL

Building #: Tower #2
 Inspector ID: ASB-0918-0666-SI

| Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | ARERA Assessment | Hazard Ranking (5-7) |
|----------------------------------|----------------------|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| Sample ID | Material Description | | | | | | | |
| 323-121818-01 | Tower #1 south side | TSI | 10% Chrysotile | Friable | Tower 1 and all pipes in the system | | 1 | X |
| 323-121818-02 | Tower #1 east side | TSI | 10% Chrysotile | Friable | | | 1 | X |
| 323-121818-03 | Tower #1 north side | TSI | 10% Chrysotile | Friable | | | 1 | X |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |
| | | | | | | | | |

Project Description: Asbestos Survey

Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 18, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 ARERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM; 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage; 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material); None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

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 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facilite
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 18, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: IATL

Building #: Road 127, Peñuelas PR
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121818-08 | Tower #3 north side | | TSI | non detected | Friable | | | 1 | X |
| 323-121818-09 | Tower #3 north side | | TSI | non detected | Friable | Tower 3 and all pipes in the system | | 1 | X |
| 323-121818-10 | Tower #3 south side | | TSI | non detected | Friable | | | 1 | X |
| | | | | | | | | | |
| | | | | | | | | | |
| | | | | | | | | | |

Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 18, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM



BEST ENVIRONMENTAL CONSULTANTS, INC.
 PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Total Sampling: _____ Job Number: 18-323

Sampling Date: Dec 18, 2018
 Building #: Road 127, Peñuelas PR
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: TAIL
 Inspector ID: ASB-0918-0666-SI

| Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (S-7) | |
|----------------------------------|------------------------------------|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|---|
| Sample ID | Material Description | | | | | | | | |
| 323-121818-11 | Tower #4 north side | TSI | 20% Chrysotile | Friable | Tower 4 and all pipes in the system | | I | X | |
| 323-121818-12 | Tower #4 south side | TSI | 20% Chrysotile | Friable | | | | I | X |
| 323-121818-13 | Tower #4 pipe Pipe Insulation 10"ø | TSI | 80% Amosite | Friable | | | | I | X |
| 323-121818-14 | Tower #4 southwest side | TSI | 20% Chrysotile | Friable | | | | I | X |
| | | | | | | | | | |

Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 18, 2018**

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 - Damaged or significantly damaged friable surfacing ACM; 2 - Damaged friable surfacing ACM; 3 - Significantly damaged friable surfacing ACM;
 4 - Damaged or significantly damaged friable miscellaneous ACM; 5 - ACM with potential for damage; 6 - ACM with potential for significant damage;
 7 - Any remaining friable ACM or friable suspected ACM; X - Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous materials);
 Note = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 - Potential for significant damage; 6 - Potential for damage; 7 - All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
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 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

BEST ENVIRONMENTAL CONSULTANTS, INC.
 PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Environmental Consultants Inc.

Customer Name: Homeca Recycling Center
 Contact: Benjamin Cntrion
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Total Sampling: _____ Job Number: 18-323

Sampling Date: Dec 18, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: JATL
 Building #: Road 127, Peñuelas PR
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121818-15 | Tower #5 north side | | TSI | 15% Chrysotile | Friable | Tower 5 and all pipes in the system | | 1 | X |
| 323-121818-16 | Tower #5 east side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121818-17 | Tower #5 south side | | TSI | 20% Amosite | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 18, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACBM; 2 = Damaged friable surfacing ACBM; 3 = Significantly damaged friable surfacing ACBM;
 4 = Damaged or significantly damaged friable miscellaneous ACBM; 5 = ACBM with potential for damage; 6 = ACBM with potential for significant damage;
 7 = Any remaining friable ACBM or friable suspected ACBM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACBM



BEST ENVIRONMENTAL CONSULTANTS, INC.
 PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cimiron
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 18, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: JATL

Building #: Road 127, Peñuelas PR
 Inspector ID: ASB-0918-0606-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121818-18 | Tower #6 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121818-19 | Sample not Analyzed | | TSI | assume | Friable | Tower 6 and all pipes in the system | | 1 | X |
| 323-121818-20 | Tower #6 south side | | TSI | 20% Amosite | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 18, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACBM; 2 = Damaged friable surfacing ACBM; 3 = Significantly damaged friable surfacing ACBM;
 4 = Damaged or significantly damaged friable miscellaneous ACBM; 5 = ACBM with potential for damage; 6 = ACBM with potential for significant damage;
 7 = Any remaining friable ACBM or friable suspected ACBM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous materials);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACBM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
Contact: Benjamin Cintron
Phone / Fax/Email: _____
Project Name: Puerto Rico Olefines old Facility
road 127, Peñuelas Puerto Rico
Job Number: 18-323

Sampling Date: Dec 18, 2018
Collected By: Carlos E. Ocasio-Feliciano
Analyzed By: JATL
Building #: Road 127, Peñuelas PR
Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|---|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-24 | Tower #7 south side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-25 | Tower #7 north side | | TSI | 80% Chrysotile | Friable | Tower 7 and all pipes in the system | | 1 | X |
| 323-121918-26 | Tank #7 interior pipe 24"ø southeast side | | TSI | not detected | Friable | | | 1 | X |
| 323-121918-34 | Tank #7 interior pipe 24"ø southeast side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ **Date:** December 18, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
AHERA Assessment Category:
 1 = Damaged or significantly damaged friable surfacing ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Environmental Consultants, Inc.

| | |
|---|--|
| Customer Name: Homeca Recycling Center | Project Name: Puerto Rico Olefines old Facility |
| Contact: Benjamin Cintron | Address: Road 127, Peñuelas Puerto Rico |
| Phone / Fax/Email: | Job Number: 18-323 |
| Sampling Date: Dec 19, 2018 | Building #: Road 127, Peñuelas PR |
| Collected By: Carlos E. Ocasio-Feliciano | Inspector ID: ASB-0918-0666-SI |
| Analyzed By: IATL | Total Sampling: |

| Project Description: Asbestos Survey | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | ABERA Assessment | Hazard Ranking (5-7) |
|--------------------------------------|----------------------------------|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| Sample ID | Homogeneous Material Description | | | | | | | |
| 323-121918-27 | Tank #2 north side | TSI | not detected | Friable | | | 1 | X |
| 323-121918-28 | Tank #2 north side | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-28A | Tank #2 10" pipe, east side | TSI | 80% Amosite | Friable | Tank #2 and all pipes in the system | | 1 | X |
| 323-121918-28B | Tank #2 10" pipe, east side | TSI | 75% Amosite | Friable | | | 1 | X |
| 323-121918-29 | Tank #2 South side | TSI | not detected | Friable | | | 1 | X |
| 323-121918-35 | Tank #2 north side | TSI | 20% Chrysotile | Friable | | | 1 | X |

Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 ABERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323
 Phone / Fax/Email: _____
 Total Sampling: _____
 Sampling Date: Dec 18, 2018
 Building #: Road 127, Peñuelas PR
 Collected By: Carlos E. Ocasio-Feliciano
 Inspector ID: ASB-0918-0666-SI
 Analyzed By: TATI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|----------------------|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | Material Description | | | | | | | |
| 323-121918-30 | Tank #3 south side | | TSI | 20% Chrysotile | Friable | Tank #3 and all pipes in the system | | 1 | X |
| 323-121918-31 | Tank #3 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 18, 2018

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cimtrou
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facilite
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: IATL

Building #: Road 127, Peñuelas PR
 Inspector ID: ASB-0918-0666-SI

Total Sampling: _____

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-32 | Tank #4 south side | | TSI | 20% Chrysotile | Friable | Tank #4 and all pipes in the system | | 1 | X |
| 323-121918-33 | Tank #4 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable surfacing ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 Note = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment

Environmental Consultants Inc.

Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Phone / Fax/Email: _____
 Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: IATL

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323
 Total Sampling: _____
 Building #: Tank 9
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|----------------------------------|-------------------------|-------------------|------------------|------------|--------------------------------------|--------------|------------------|----------------------|
| Sample ID | Material Description | | | | | | | |
| 323-121918-42 | Tower #9 south side | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-43 | Tower #9 northeast side | TSI | 20% Chrysotile | Friable | Tower #9 and all pipes in the system | | 1 | X |
| 323-121918-44 | Tower #9 southeast side | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspect ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 Note - No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM



BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cuitron
 Phone / Fax/Email: _____
 Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: IATL
 Building #: Tank 6
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | ABERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-39 | Tank #6 south side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-40 | Tank #6 west side | | TSI | 20% Chrysotile | Friable | Tank #4 and all pipes in the system | | 1 | X |
| 323-121918-41 | Tank #6 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 ABERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 Note = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



| Customer Name: Homeca Recycling Center Contact: Benjamin CINTRON Phone / Fax/Email: _____ | | Project Name: Puerto Rico Olefines old Facilite road 127, Peñuelas Puerto Rico Total Sampling: _____ Job Number: 18-323 | | | | | | |
|---|------------------------------------|---|------------------|------------|---------------------------------------|--------------|------------------|----------------------|
| Sampling Date: Dec 19, 2018 Collected By: Carlos E. Ocasio-Feliciano Analyzed By: IATL | | Building #: Tower #10 Inspector ID: ASD-0918-0666-SI | | | | | | |
| Project Description: Asbestos Survey | | | | | | | | |
| Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | ABERA Assessment | Hazard Ranking (5-7) |
| Sample ID | Material Description | | | | | | | |
| 323-121918-45 | Tower #10 northeast side | TSI | 20% Chrysotile | Friable | Tower #10 and all pipes in the system | | 1 | X |
| 323-121918-46 | Tower #10, 8" pipe, northeast side | TSI | 80% Amosite | Friable | | | 1 | X |
| 323-121918-47 | Tower #10 northeast side | TSI | 80% Amosite | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 ABERA Assessment Category:
 1 = Damaged or significantly damaged TSI/ACBM; 2 = Damaged friable surfacing ACBM; 3 = Significantly damaged friable surfacing ACBM;
 4 = Damaged or significantly damaged friable miscellaneous ACBM; 5 = ACBM with potential for damage; 6 = ACBM with potential for significant damage;
 7 = Any remaining friable ACBM or friable suspected ACBM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 3 = Potential for significant damage; 4 = Potential for damage; 5 = All remaining ACBM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homceca Recycling Center
 Contact: Benjamin Cimtrou
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facilite road 127, Petuelas Puerto Rico
 Job Number: 18-323

Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: LAJL

Building #: Tower 11
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | ABERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|---------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-48 | Tower #11 northeast side | | TSI | 20% Chrysotile | Friable | Tower #11 and all pipes in the system | | 1 | X |
| 323-121918-49 | Tower #11 south side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-50 | Tower #11 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 ABERA Assessment Category:
 1 = Damaged or significantly damaged friable surfacing ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
 PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Environmental Consultants Inc.

| | | | |
|--|--|---|--|
| Customer Name: Homeca Recycling Center | | Project Name: Puerto Rico Olefines old Facility | |
| Contact: Benjamin Cintron | | road 127, Peñuelas Puerto Rico | |
| Phone / Fax/Email: | | Job Number: 18-323 | |
| Sampling Date: Dec 19, 2018 | | Building #: Tank 5 | |
| Collected By: Carlos E. Ocasio-Feliciano | | Inspector ID: ASB-0918-0666-SI | |
| Analyzed By: IATL | | | |

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|----------------------|-------------------|------------------|------------|---------------------------------------|--------------|------------------|----------------------|
| | Material Description | Material Description | | | | | | | |
| 323-121918-60 | Tank 5 south side | | TSI | 10% Chrysotile | Friable | Tower #12 and all pipes in the system | | 1 | X |
| 323-121918-61 | Tank 5 north side | | TSI | 20% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREP

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Environmental Consultants Inc.

| | |
|---|--|
| Customer Name: Homeca Recycling Center | Project Name: Puerto Rico Olefines old Facility |
| Contact: Benjamin Cintron | road 127, Peñuelas Puerto Rico |
| Phone / Fax/Email: | Job Number: 18-323 |
| Sampling Date: Dec 19, 2018 | Building #: Tank 6 |
| Collected By: Carlos E. Ocasio-Feliciano | Inspector ID: ASB-0918-0666-SI |
| Analyzed By: IATL | Total Sampling: |

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|----------------------|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | Material Description | | | | | | | |
| 323-121918-62 | Tank 6 northeast side | | TSI | 20% Chrysotile | Friable | Tank #6 and all pipes in the system | | 1 | X |
| 323-121918-63 | Tank 6 north side | | TSI | 15% Chrysotile | Friable | | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
AHERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Environmental Consultants Inc.

| | |
|---|--|
| Customer Name: Homeca Recycling Center | Project Name: Puerto Rico Olefines old Facility |
| Contact: Benjamin Cintron | road 127, Peñuelas Puerto Rico |
| Phone / Fax/Email: | Job Number: 18-323 |
| Sampling Date: Dec 19, 2018 | Building #: Tank 7 |
| Collected By: Carlos E. Ocasio-Feliciano | Inspector ID: ASB-0918-0666-SI |
| Analyzed By: IATL | |

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-------------------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-64 | Tank 7 northeast side | | TSI | 15% Chrysotile | Friable | Tank #7 and all pipes in the system | | 1 | X |
| 323-121918-65 | Tank 7 north side | | TSI | 15% Chrysotile | Friable | | | 1 | X |
| | | | | | | | | | |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged friable surfacing ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspended ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous materials);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



| | |
|---|--|
| Customer Name: Homeca Recycling Center | Project Name: Puerto Rico Olefines old Facility |
| Contact: Benjamin Cintron | road 127, Peñuelas Puerto Rico |
| Phone / Fax/Email: | Job Number: 18-323 |
| Sampling Date: Dec 19, 2018 | Building #: Fin Fan Air Cooler |
| Collected By: Carlos E. Ocasio-Feliciano | Inspector ID: ASB-0918-0666-SI |
| Analyzed By: TATL | |

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|---------------------------|--------------|------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-66 | Fin Fan Air Cooler, 12" Ø pipe | | TSI | 75% Amosite | Friable | Fin Fan Air Cooler System | | 1 | X |
| 323-121918-67 | Fin Fan Air Cooler, 10" Ø pipe | | TSI | 75% Amosite | Friable | system | | 1 | X |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
AHERA Assessment Category:
 1 = Damaged or significantly damaged friable surfacing ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM; 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage; 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM



BEST ENVIRONMENTAL CONSULTANTS, INC.
 PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homesa Recycling Center
 Contact: Benjamin Cimtrou
 Phone / Fax/Email: _____

Project Name: Puerto Rico Olefines old Facility
 road 127, Peñuelas Puerto Rico
 Total Sampling: 18-323

Job Number: 18-323

Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: TATL

Building #: Tower #13
 Inspector ID: ASB-0918-0606-SI

| Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|----------------------------------|-------------------------------|-------------------|------------------|------------|---------------------------------------|--------------|------------------|----------------------|
| Sample ID | Material Description | | | | | | | |
| 323-121918-51 | Tower #13, 6" Pipe front side | TSI | 75% Amosite | Friable | | | 1 | X |
| 323-121918-52 | Tower #13, 6" Pipe front side | TSI | 75% Amosite | Friable | Tower #13 and all pipes in the system | | 1 | X |
| 323-121918-57 | Tower #13, 6" Pipe front side | TSI | 80% Amosite | Friable | | | 1 | X |
| 323-121918-58 | Tower #13 west side | TSI | 20% Chrysotile | Friable | | | 1 | X |
| 323-121918-59 | Tower #13 south side | TSI | 20% Chrysotile | Friable | | | 1 | X |
| | | | | | | | | |

Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: December 19, 2018

Friability: F = friable, NF = non-friable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged TSI-ACBM; 2 = Damaged friable surfacing-ACBM; 3 = Significantly damaged friable surfacing-ACBM;
 4 = Damaged or significantly damaged friable miscellaneous-ACBM; 5 = ACBM with potential for damage; 6 = ACBM with potential for significant damage;
 7 = Any remaining friable ACBM or friable suspected ACBM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACBM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Project Name: Puerto Rico Olefines old Facility
 Address: road 127, Peñuelas Puerto Rico
 Job Number: 18-323

Phone / Fax/Email: _____
 Total Sampling: _____

Sampling Date: Dec 19, 2018
 Building #: Boiler #2
 Collected By: Carlos E. Ocasio-Feliciano
 Inspector ID: ASB-0918-0666-SI
 Analyzed By: TATL

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|----------------------|-------------------|------------------|------------|-----------------------|--------------|------------------|----------------------|
| | Material Description | Material Description | | | | | | | |
| 323-121918-73 | Inside brick sample | | Miscellaneous | Not Detected | Friable | all boilers | | 4 | X |
| 323-121918-74 | Inside Wall Insulation, broum | | Miscellaneous | Not Detected | Friable | all boilers | | 4 | X |
| | | | | | | | | | |
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Carlos E. Ocasio-Feliciano

Inspected by: _____ Date: **December 19, 2018**

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AHERA Assessment Category:
 1 = Damaged or significantly damaged friable miscellaneous ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable surfacing ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS, INC.
PO BOX 560180 GUAYANILLA, PR 00656-0180
Asbestos Sample Inspection Form For Physical Hazard Assessment



Customer Name: Homeca Recycling Center
 Contact: Benjamin Cintron
 Phone / Fax/Email: _____


Project Name: Puerto Rico Olefins old Facility
 road 127, Peñuelas Puerto Rico
 Total Sampling: _____ Job Number: 18-323

Sampling Date: Dec 19, 2018
 Collected By: Carlos E. Ocasio-Feliciano
 Analyzed By: TATL

Building #: Boiler #2
 Inspector ID: ASB-0918-0666-SI

Project Description: Asbestos Survey

| Sample ID | Homogeneous Material Description | | Material Category | Asbestos Content | Friability | Location of Materials | Total Square | AIHERA Assessment | Hazard Ranking (5-7) |
|---------------|----------------------------------|--|-------------------|------------------|------------|-----------------------|--------------|-------------------|----------------------|
| | Material Description | | | | | | | | |
| 323-121918-73 | Inside brick sample | | Miscellaneous | Not Detected | Friable | all boilers | | 4 | X |
| 323-121918-74 | Inside Wall Insulation, broom | | Miscellaneous | Not Detected | Friable | all boilers | | 4 | X |
| | | | | | | | | | |
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| | | | | | | | | | |

Inspected by:  Date: December 19, 2018

Friability: F = friable, NF = nonfriable, X = not applicable (material is non-ACBM)
 AIHERA Assessment Category:
 1 = Damaged or significantly damaged TSI ACM; 2 = Damaged friable surfacing ACM; 3 = Significantly damaged friable surfacing ACM;
 4 = Damaged or significantly damaged friable miscellaneous ACM; 5 = ACM with potential for damage; 6 = ACM with potential for significant damage;
 7 = Any remaining friable ACM or friable suspected ACM; X = Not applicable (material is non-ACBM or non-friable surfacing or miscellaneous material);
 None = No assessment category provided in original inspection.
 Hazard Ranking Category: 5 = Potential for significant damage; 6 = Potential for damage; 7 = All remaining ACM

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

APPENDIX III

ANALYTICAL RESULTS

JANUARY 29, 2019



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 Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

| | |
|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|---|--|
| Lab No.: 6682015 Client No.: 323-121818-01 <u>Percent Asbestos:</u> <i>10 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 1, South Side Facility: <u>Percent Non-Fibrous Material:</u> 90 |
| Lab No.: 6682016 Client No.: 323-121818-02 <u>Percent Asbestos:</u> <i>10 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 1, East Side Facility: <u>Percent Non-Fibrous Material:</u> 90 |
| Lab No.: 6682017 Client No.: 323-121818-03 <u>Percent Asbestos:</u> <i>10 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 1, North Side Facility: <u>Percent Non-Fibrous Material:</u> 90 |
| Lab No.: 6682018 Client No.: 323-121818-04 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: Grey/White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 2, South Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682019 Client No.: 323-121818-05 <u>Percent Asbestos:</u> <i>15 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 2, East Side Facility: <u>Percent Non-Fibrous Material:</u> 85 |
| Lab No.: 6682020 Client No.: 323-121818-06 <u>Percent Asbestos:</u> <i>80 Amosite</i> | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 2, 12" Pipe, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: *Rebecca Hargrove*
 Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
 Frank E. Ehrenfeld, III
 Laboratory Director



Dated : 1/4/2019 2:27:21

Page 1 of 16



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| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|--|---|
| Lab No.: 6682021 Client No.: 323-121818-07 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: TK #1,Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 2, North Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682022 Client No.: 323-121818-08 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: White Insulation Client Description: TK #1,Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 20 Cellulose 2 Fibrous Glass | Location: Tower 3, North Side Facility: <u>Percent Non-Fibrous Material:</u> 78 |
| Lab No.: 6682023 Client No.: 323-121818-09 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: White Insulation Client Description: TK #1,Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 20 Cellulose 2 Fibrous Glass | Location: Tower 3, Distillation Unit, North Side Facility: <u>Percent Non-Fibrous Material:</u> 78 |
| Lab No.: 6682024 Client No.: 323-121818-10 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: White/Grey Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 15 Cellulose 15 Fibrous Glass | Location: Tower 3, South Side Facility: <u>Percent Non-Fibrous Material:</u> 70 |
| Lab No.: 6682025 Client No.: 323-121818-11 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 4, North Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682026 Client No.: 323-121818-12 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White/Grey Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 4, South Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: *Rebecca Hargrove*
 Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
 Frank E. Ehrenfeld, III
 Laboratory Director

Dated : 1/4/2019 2:27:21

Page 2 of 16

JANUARY 29, 2019



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| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|---|--|
| Lab No.: 6682027 Client No.: 323-121818-13 | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) Pipe Insulation 10" <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 4 Facility: |
| <u>Percent Asbestos:</u> 80 Amosite | | <u>Percent Non-Fibrous Material:</u> 20 |
| Lab No.: 6682028 Client No.: 323-121818-14 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 4, Southwest Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682029 Client No.: 323-121818-15 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 5, North Side Facility: |
| <u>Percent Asbestos:</u> 15 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 85 |
| Lab No.: 6682030 Client No.: 323-121818-16 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 5, East Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682031 Client No.: 323-121818-17 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 5, South Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682032 Client No.: 323-121818-18 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 6, North Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: Rebecca Hargrove
 Analyst: Rebecca Hargrove

Approved By: Frank E. Ehrenfeld, III
 Frank E. Ehrenfeld, III
 Laboratory Director

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Page 3 of 16

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREP



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| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|--|--|--|
| Lab No.: 6682033 Client No.: 323-121818-19 Percent Asbestos: <i>Sample Not Received</i> | Analyst Observation: Sample Not Received Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: Sample Not Received | Location: Tower 6, Northeast Side Facility: Percent Non-Fibrous Material: |
| Lab No.: 6682034 Client No.: 323-121818-20 Percent Asbestos: <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 6, South Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682035 Client No.: 323-121818-21 Percent Asbestos: <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: TK #1 North Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682036 Client No.: 323-121818-22 Percent Asbestos: <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: TK #1 Northeast Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682037 Client No.: 323-121818-23 Percent Asbestos: <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: TK #1 South Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682038 Client No.: 323-121918-24 Percent Asbestos: <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 7, South Side Facility: Percent Non-Fibrous Material: 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: *Rebecca Hargrove*
 Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
 Frank E. Ehrenfeld, III
 Laboratory Director

Dated : 1/4/2019 2:27:21

Page 4 of 16





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| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|--|--|
| Lab No.: 6682039 Client No.: 323-121918-25 <u>Percent Asbestos:</u> 80 Amosite | Analyst Observation: Brown Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 7, North Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |
| Lab No.: 6682040 Client No.: 323-121918-26 <u>Percent Asbestos:</u> None Detected | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Interior Pipe 24" <u>Percent Non-Asbestos Fibrous Material:</u> 15 Cellulose | Location: Tower 7, Southeast Side Facility: <u>Percent Non-Fibrous Material:</u> 85 |
| Lab No.: 6682041 Client No.: 323-121918-27 <u>Percent Asbestos:</u> None Detected | Analyst Observation: White/Grey Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 15 Cellulose 15 Fibrous Glass | Location: Tank 2, North Side Facility: <u>Percent Non-Fibrous Material:</u> 70 |
| Lab No.: 6682041(L2) Client No.: 323-121918-27 <u>Percent Asbestos:</u> None Detected | Analyst Observation: White Wrap Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 40 Fibrous Glass | Location: Tank 2, North Side Facility: <u>Percent Non-Fibrous Material:</u> 60 |
| Lab No.: 6682042 Client No.: 323-121918-28 <u>Percent Asbestos:</u> 20 Chrysotile | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tank 2, North Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682043 Client No.: 323-121918-28A <u>Percent Asbestos:</u> 80 Amosite | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 10" Pipe <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tank 2, East Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: Rebecca Hargrove
 Analyst: Rebecca Hargrove

Approved By: Frank E. Ehrenfeld, III
 Frank E. Ehrenfeld, III
 Laboratory Director

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| | |
|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|--|--|---|
| Lab No.: 6682044 Client No.: 323-121918-28B | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 10" Pipe | Location: Tank 2, East Side Facility: |
| <u>Percent Asbestos:</u> 75 <i>Amosite</i> | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 25 |
| Lab No.: 6682045 Client No.: 323-121918-29 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 2, South Side Facility: |
| <u>Percent Asbestos:</u> <i>None Detected</i> | <u>Percent Non-Asbestos Fibrous Material:</u> 10 Synthetic | <u>Percent Non-Fibrous Material:</u> 90 |
| Lab No.: 6682046 Client No.: 323-121918-30 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 3, South Side Facility: |
| <u>Percent Asbestos:</u> 20 <i>Chrysotile</i> | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682047 Client No.: 323-121918-31 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 3, North Side Facility: |
| <u>Percent Asbestos:</u> 20 <i>Chrysotile</i> | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682048 Client No.: 323-121918-32 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 4, North Side Facility: |
| <u>Percent Asbestos:</u> 20 <i>Chrysotile</i> | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682049 Client No.: 323-121918-33 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 4, West Side Facility: |
| <u>Percent Asbestos:</u> 20 <i>Chrysotile</i> | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: *Rebecca Hargrove*
 Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
 Frank E. Ehrenfeld, III
 Laboratory Director

Dated : 1/4/2019 2:27:21

Page 6 of 16



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 Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

| | |
|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|--|--|
| Lab No.: 6682050 Client No.: 323-121918-34 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Interior Pipe 24" | Location: Tower 7, Southeast Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682051 Client No.: 323-121918-35 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 2, North Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682052 Client No.: 323-121918-39 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 6, South Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682053 Client No.: 323-121918-40 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 6, West Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682054 Client No.: 323-121918-41 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tank 6, North Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682055 Client No.: 323-121918-42 | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) | Location: Tower 9, South Side Facility: |
| <u>Percent Asbestos:</u> 20 Chrysotile | <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: Rebecca Hargrove
 Analyst: Rebecca Hargrove

Approved By: Frank E. Ehrenfeld, III
 Frank E. Ehrenfeld, III
 Laboratory Director

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Page 7 of 16

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREPA



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 Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

| | |
|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|--|---|
| Lab No.: 6682056 Client No.: 323-121918-43 <u>Percent Asbestos:</u> 20 Chrysotile | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 9, North Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682057 Client No.: 323-121918-44 <u>Percent Asbestos:</u> 20 Chrysotile | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 9, Southeast Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682058 Client No.: 323-121918-45 <u>Percent Asbestos:</u> 20 Chrysotile | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 10, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682059 Client No.: 323-121918-46 <u>Percent Asbestos:</u> 80 Amosite | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 8" <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 10, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |
| Lab No.: 6682060 Client No.: 323-121918-47 <u>Percent Asbestos:</u> 80 Amosite | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 10, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |
| Lab No.: 6682061 Client No.: 323-121918-48 <u>Percent Asbestos:</u> 20 Chrysotile | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 11, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: Rebecca Hargrove
 Analyst: Rebecca Hargrove

Approved By: Frank E. Ehrenfeld, III
 Frank E. Ehrenfeld, III
 Laboratory Director

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Page 8 of 16



BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
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CERTIFICATE OF ANALYSIS

Client: Best Environmental Consultants
 PO Box 560180
 Guayanilla PR 00656-0180
 Client: BES006

Report Date: 1/3/2019
 Report No.: 580418 - PLM
 Project: Puerto Rico Olefines, Peñuelas
 Project No.: 18-323

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|--|--|--|
| Lab No.: 6682062 Client No.: 323-121918-49 Percent Asbestos: <u>20 Chrysotile</u> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 11, South Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682063 Client No.: 323-121918-50 Percent Asbestos: <u>20 Chrysotile</u> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 11, North Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682064 Client No.: 323-121918-51 Percent Asbestos: <u>75 Amosite</u> | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) Pipe 6" Percent Non-Asbestos Fibrous Material: None Detected | Location: Front Side, Tower 13 Facility: Percent Non-Fibrous Material: 25 |
| Lab No.: 6682065 Client No.: 323-121918-52 Percent Asbestos: <u>75 Amosite</u> | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) Pipe 6" Percent Non-Asbestos Fibrous Material: None Detected | Location: Front Side, Tower 13 Facility: Percent Non-Fibrous Material: 25 |
| Lab No.: 6682066 Client No.: 323-121918-54 Percent Asbestos: <u>20 Chrysotile</u> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 12, South Side Facility: Percent Non-Fibrous Material: 80 |
| Lab No.: 6682067 Client No.: 323-121918-55 Percent Asbestos: <u>20 Chrysotile</u> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) Percent Non-Asbestos Fibrous Material: None Detected | Location: Tower 12, North Side Facility: Percent Non-Fibrous Material: 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: Rebecca Hargrove
 Analyst: Rebecca Hargrove

Approved By: Frank E. Ehrenfeld, III
 Frank E. Ehrenfeld, III
 Laboratory Director

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Page 9 of 16

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
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 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
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CERTIFICATE OF ANALYSIS

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|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|---|---|
| Lab No.: 6682068 Client No.: 323-121918-56 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 12, West Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682069 Client No.: 323-121918-57 <u>Percent Asbestos:</u> <i>80 Amosite</i> | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 6" <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 13, North Side Facility: <u>Percent Non-Fibrous Material:</u> 20 |
| Lab No.: 6682070 Client No.: 323-121918-58 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 13, West Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682071 Client No.: 323-121918-59 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tower 13, South Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |
| Lab No.: 6682072 Client No.: 323-121918-60 <u>Percent Asbestos:</u> <i>10 Chrysotile</i> | Analyst Observation: Tan/White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 25 Fibrous Glass | Location: Tank 5, South Side Facility: <u>Percent Non-Fibrous Material:</u> 65 |
| Lab No.: 6682073 Client No.: 323-121918-61 <u>Percent Asbestos:</u> <i>20 Chrysotile</i> | Analyst Observation: White Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Tank 5, North Side Facility: <u>Percent Non-Fibrous Material:</u> 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature: *Rebecca Hargrove*
 Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
 Frank E. Ehrenfeld, III
 Laboratory Director

Dated : 1/4/2019 2:27:21

Page 10 of 16



48-148

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
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CERTIFICATE OF ANALYSIS

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|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|------------------------------------|---|-------------------------------------|
| Lab No.: 6682074 | Analyst Observation: White Insulation | Location: Tank 6, Northeast Side |
| Client No.: 323-121918-62 | Client Description: Thermal System Insulation (TSI) | Facility: |
| Percent Asbestos: 20 Chrysotile | Percent Non-Asbestos Fibrous Material: None Detected | Percent Non-Fibrous Material: 80 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
Date Analyzed: 01/03/2019
Signature: *Rebecca Hargrove*
Analyst: Rebecca Hargrove

Approved By: *Frank E. Ehrenfeld, III*
Frank E. Ehrenfeld, III
Laboratory Director

Dated : 1/4/2019 2:27:21

Page 11 of 16



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|---|---|
| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|---|---|
| Lab No.: 6682075 Client No.: 323-121918-63 <u>Percent Asbestos:</u> 15 Chrysotile | Analyst Observation: Tan Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 25 Fibrous Glass | Location: Tank 6, North Side Facility: <u>Percent Non-Fibrous Material:</u> 60 |
| Lab No.: 6682076 Client No.: 323-121918-64 <u>Percent Asbestos:</u> 15 Chrysotile | Analyst Observation: Tan Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 25 Fibrous Glass | Location: Tank 7, Northeast Side Facility: <u>Percent Non-Fibrous Material:</u> 60 |
| Lab No.: 6682077 Client No.: 323-121918-65 <u>Percent Asbestos:</u> 15 Chrysotile | Analyst Observation: Tan Insulation Client Description: Thermal System Insulation (TSI) <u>Percent Non-Asbestos Fibrous Material:</u> 25 Fibrous Glass | Location: Tank 7, North Side Facility: <u>Percent Non-Fibrous Material:</u> 60 |
| Lab No.: 6682078 Client No.: 323-121918-66 <u>Percent Asbestos:</u> 75 Amosite | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 12" <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Fin Fan Air Cooler Facility: <u>Percent Non-Fibrous Material:</u> 25 |
| Lab No.: 6682079 Client No.: 323-121918-67 <u>Percent Asbestos:</u> 75 Amosite | Analyst Observation: Grey Insulation Client Description: Thermal System Insulation (TSI) 10" <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Fin Fan Air Cooler Facility: <u>Percent Non-Fibrous Material:</u> 25 |
| Lab No.: 6682080 Client No.: 323-121918-68 <u>Percent Asbestos:</u> 80 Chrysotile | Analyst Observation: Beige Wrap Client Description: Fireproofing Cloth Between Metal Walls <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Boiler #6 Facility: <u>Percent Non-Fibrous Material:</u> 20 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature:
 Analyst: Erik Swanson

Approved By:
 Frank E. Ehrenfeld, III
 Laboratory Director

Dated : 1/4/2019 2:27:21

Page 12 of 16

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
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| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

PLM BULK SAMPLE ANALYSIS SUMMARY

| | | |
|---|--|---|
| Lab No.: 6682081 Client No.: 323-121918-69 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: White Insulation Client Description: Inside Wall Insulation (White) <u>Percent Non-Asbestos Fibrous Material:</u> 98 Fibrous Glass | Location: Boiler #6 Facility: <u>Percent Non-Fibrous Material:</u> 2 |
| Lab No.: 6682082 Client No.: 323-121918-70 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: Tan Brick Client Description: Inside Brick Sample <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Boiler #6 Facility: <u>Percent Non-Fibrous Material:</u> 100 |
| Lab No.: 6682083 Client No.: 323-121918-71 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: White Insulation Client Description: Inside Wall Insulation (White) <u>Percent Non-Asbestos Fibrous Material:</u> 98 Fibrous Glass | Location: Boiler #5 Facility: <u>Percent Non-Fibrous Material:</u> 2 |
| Lab No.: 6682084 Client No.: 323-121918-72 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: Grey Insulation Client Description: Inside Wall Insulation (Brown) <u>Percent Non-Asbestos Fibrous Material:</u> 98 Fibrous Glass | Location: Boiler #5 Facility: <u>Percent Non-Fibrous Material:</u> 2 |
| Lab No.: 6682085 Client No.: 323-121918-73 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: Tan Brick Client Description: Inside Brick Sample <u>Percent Non-Asbestos Fibrous Material:</u> None Detected | Location: Boiler #2 Facility: <u>Percent Non-Fibrous Material:</u> 100 |
| Lab No.: 6682086 Client No.: 323-121918-74 <u>Percent Asbestos:</u> <i>None Detected</i> | Analyst Observation: Brown Insulation Client Description: Inside Wall Insulation (Brown And White) <u>Percent Non-Asbestos Fibrous Material:</u> 98 Fibrous Glass | Location: Boiler #2 Facility: <u>Percent Non-Fibrous Material:</u> 2 |

Please refer to the Appendix of this report for further information regarding your analysis.

Date Received: 12/28/2018
 Date Analyzed: 01/03/2019
 Signature:
 Analyst: Erik Swanson

Approved By:
 Frank E. Ehrenfeld, III
 Laboratory Director

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Page 13 of 16



51-148



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| Client: Best Environmental Consultants PO Box 560180 Guayanilla PR 00656-0180 | Report Date: 1/3/2019 Report No.: 580418 - PLM Project: Puerto Rico Olefines, Peñuelas Project No.: 18-323 |
| Client: BES006 | |

Appendix to Analytical Report

Customer Contact: Best Environmental
Method: US EPA 600, R93-116

This appendix seeks to promote greater understanding of any observations, exceptions, special instructions, or circumstances that the laboratory needs to communicate to the client concerning the above samples. The information below is used to help promote your ability to make the most informed decisions for you and your customers. Please note the following points of contact for any questions you may have.

iATL Customer Service: customerservice@iatl.com
iATL Office Manager: cdavis@iatl.com
iATL Account Representative: Kelly Klippel
Sample Login Notes: See Batch Sheet Attached
Sample Matrix: Bulk Building Materials
Exceptions Noted: See Following Pages

General Terms, Warrants, Limits, Qualifiers:

General information about iATL capabilities and client/laboratory relationships and responsibilities are spelled out in iATL policies that are listed at www.iATL.com and in our Quality Assurance Manual per ISO 17025 standard requirements. The information therein is a representation of iATL definitions and policies for turnaround times, sample submittal, collection media, blank definitions, quantification issues and limit of detection, analytical methods and procedures, sub-contracting policies, results reporting options, fees, terms, and discounts, confidentiality, sample archival and disposal, and data interpretation.

iATL warrants the test results to be of a precision normal for the type and methodology employed for each sample submitted. iATL disclaims any other warrants, expressed or implied, including warranty of fitness for a particular purpose and warranty of merchantability. iATL accepts no legal responsibility for the purpose for which the client uses test results. Any analytical work performed must be governed by our Standard Terms and Conditions. Prices, methods and detection limits may be changed without notification. Please contact your Customer Service Representative for the most current information.

This confidential report relates only to those item(s) tested and does not represent an endorsement by NIST-NVLAP, AIHA LAP LLC, or any agency of local, state or province governments nor of any agency of the U.S. government.

This report shall not be reproduced except in full, without written approval of the laboratory.

Information Pertinent to this Report:

Analysis by US EPA 600 93-116: Determination of Asbestos in Bulk Building Materials by Polarized Light Microscopy (PLM).

Certifications:

- NIST-NVLAP No. 101165-0
- NYSDOH-ELAP No. 11021
- AIHA-LAP, LLC No. 100188

Quantification at <0.25% by volume is possible with this method. (PC) Indicates Stratified Point Count Method performed. (PC-Trace) means that asbestos was detected but is not quantifiable under the Point Counting regimen. PC Trace represents a <0.25% amount. Analysis includes all distinct separable layers in accordance with EPA 600 Method. If not reported or otherwise noted, layer is either not present or the client has specifically requested that it not be analyzed (ex. analyze until positive instructions). Small asbestos fibers may be missed by PLM due to resolution limitations of the optical microscope. Therefore, PLM is not consistently reliable in detecting asbestos in non-friable organically bound (NOB) materials. Quantitative transmission electron microscopy (TEM) is currently the only method that can pronounce materials as non-asbestos containing.

Analytical Methodology Alternatives: Your initial request for analysis may not have accounted for recent advances in regulatory requirements or advances in technology that are routinely used in similar situations for other qualified projects. You may have the option to explore additional analysis for further information. Below are a few options, listed as the matrix followed by the appropriate methodology. Also included are links to more information on our website.

Bulk Building Materials that are Non-Friable Organically Bound (NOB) by Gravimetric Reduction techniques employing PLM and TEM: ELAP 198.6 (PLM-NOB), ELAP 198.4 (TEM-NOB)

Loose Fill Vermiculite Insulation, Attic Insulation, Zonolite (copyright), etc.: US EPA 600 R-4/004 (multi-tiered analytical process)

Dated : 1/4/2019 2:27:21

Page 14 of 16



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CERTIFICATE OF ANALYSIS

Client: Best Environmental Consultants
PO Box 560180
Guayanilla PR 00656-0180

Report Date: 1/3/2019
Report No.: 580418 - PLM
Project: Puerto Rico Olefines, Peñuelas
Project No.: 18-323

Client: BES006

Sprayed On Insulation/Fireproofing with Vermiculite (SOF-V): ELAP 198.8 (PLM-SOF-V)

Soil, sludge, sediment, aggregate, and like materials analyzed for asbestos or other elongated mineral particles (ex. erionite, etc.): ASTM D7521, CARB 435, and other options available

Asbestos in Surface Dust according to one of ASTM's Methods (very dependent on sampling collection technique – by TEM): ASTM D 5755, D5756, or D6480

Various other asbestos matrices (air, water, etc.) and analytical methods are available.

Disclaimers / Qualifiers:

There may be some samples in this project that have a "NOTE:" associated with a sample result. We use added disclaimers or qualifiers to inform the client about something that requires further explanation. Here is a list with highlighted disclaimers that may be pertinent to this project. For a full explanation of these and other disclaimers, please inquire at customerservice@iatl.com.

- 1) Note: No mastic provided for analysis.
- 2) Note: Insufficient mastic provided for analysis.
- 3) Note: Insufficient material provided for analysis.
- 4) Note: Insufficient sample provided for QC reanalysis.
- 5) Note: Different material than indicated on Sample Log / Description.
- 6) Note: Sample not submitted.
- 7) Note: Attached to asbestos containing material.
- 8) Note: Received wet.
- 9) Note: Possible surface contamination.
- 10) Note: Not building material. 1% threshold may not apply.
- 11) Note: Recommend TEM-NOB analysis as per EPA recommendations.
- 12) Note: Asbestos detected but not quantifiable.
- 13) Note: Multiple identical samples submitted, only one analyzed.
- 14) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.080%.
- 15) Note: Analyzed by EPA 600/R-93/116. Point Counting detection limit at 0.125%.
- 16) Note: This sample contains >10% vermiculite mineral. See Appendix for Recommendations for Vermiculite Analysis.

Recommendations for Vermiculite Analysis:

Several analytical protocols exist for the analysis of asbestos in vermiculite. These analytical approaches vary depending upon the nature of the vermiculite mineral being tested (e.g. un-processed gange, homogeneous exfoliated books of mica, or mixed mineral composites). Please contact your client representative for pricing and turnaround time options available.

iATL recommends initial testing using the EPA 600/R-93/116 method. This method is specifically designed for the analysis of asbestos in bulk building materials. It provides an acceptable starting point for primary screening of vermiculite for possible asbestos.

Results from this testing may be inconclusive. EPA suggests proceeding to a multi-tiered analysis involving wet separation techniques in conjunction with PLM and TEM gravimetric analysis (EPA 600/R-04/004).

For New York State customers, NYSDOH requires disclaimers and qualifiers for various vermiculite containing samples that direct analysis via ELAP198.6 and ELAP198.8 for samples that contain >10% vermiculite mineral where ELAP198.6 may be used to evaluate the asbestos content of the material. However, any test result using ELAP198.6 will be reported with the following disclaimer: "ELAP198.6 method does not remove vermiculite and may underestimate the level of asbestos present in a sample containing >10% vermiculite."

Further information on this method and other vermiculite and asbestos issues can be found at the following: Agency for Toxic Substances and Disease Registry (ATSDR) www.atsdr.cdc.gov, United States Geological Survey (USGS) www.minerals.usgs.gov/minerals/, US EPA www.epa.gov/asbestos. The USEPA also has an informative brochure "Current Best Practices for Vermiculite Attic Insulation" EPA 747F03001 May 2003, that may assist the health and remediation professional.

The following is a summary of the analytical process outlines in the EPA 600/R-04/004 Method:

- 1) **Analytical Step/Method:** Initial Screening by PLM, EPA 600R-93/116
Requirements/Comments: Minimum of 0.1 g of sample. -0.25% LOQ for most samples.
- 2) **Analytical Step/Method:** Wet Separation by PLM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Sinks" only.

Dated : 1/4/2019 2:27:21

Page 15 of 16

BEST ENVIRONMENTAL CONSULTANTS INC.
ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREI



9000 Commerce Parkway Suite B
Mt. Laurel, New Jersey 08054
Telephone: 856-231-9449
Email: customerservice@iatl.com

CERTIFICATE OF ANALYSIS

Client: Best Environmental Consultants
PO Box 560180
Guayanilla PR 00656-0180

Report Date: 1/3/2019
Report No.: 580418 - PLM
Project: Puerto Rico Olefines, Peñuelas
Project No.: 18-323

Client: BES006

3) Analytical Step/Method: Wet Separation by PLM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Floats" only.

4) Analytical Step/Method: Wet Separation by TEM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Sinks" only.

5) Analytical Step/Method: Wet Separation by TEM Gravimetric Technique, EPA R-04/004
Requirements/Comments: Minimum 50g** of dry sample. Analysis of "Suspension" only.

LOQ, Limit of Quantitation estimates for mass and volume analyses.

*With advance notice and confirmation by the laboratory.

**Approximately 1 Liter of sample in double-bagged container (~9x6 inch bag of sample).

Dated : 1/4/2019 2:27:21

Page 16 of 16



Environmental Consultants Inc.

54-148

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180
 CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)



Best Environmental Consultants Inc.

COC#: **323-121818-Bulk**
 Page 1 of 3

| Customer Name: <i>Homeca Recycling</i> | | Project Name: <i>Puerto Rico Oligfines, Peñuelas</i> | | Job Number: <i>18-323</i> | | Remarks: | | |
|---|--------------------|--|--|---|--------------------|--|--------------------|------|
| Address: <i>Ponce PR</i> | | Total Samples: <i>23</i> | | ASB Inspector ID: <i>ASB-0918-0666-SI</i> | | | | |
| Phone/Fax/E-mail: | | EQB Inspector ID: | | Structure Address: | | | | |
| Collected by: <i>[Signature]</i> | | Road 127, Peñuelas Puerto Rico | | Bulk Sample for Asbestos | | | | |
| Analyzed by Lab: <i>LATL</i> | | ADHA Lab ID: <i>100188</i> | | | | | | |
| Project Description: <i>Bulk Sampling for Asbestos Survey</i> | | | | | | | | |
| Sample No. | Date | Time | Sample Description | Wipe | Swab | Spore Trap | TCLP | Bulk |
| 323-121818-01 | Dec 18, 2018 | 09:30 | Thermal System Insulation (TSI) Tower 1, South Side | <i>6682015</i> | | | | X |
| 323-121818-02 | Dec 18, 2018 | 09:41 | Thermal System Insulation (TSI) Tower 1, East Side | <i>6682016</i> | | | | X |
| 323-121818-03 | Dec 18, 2018 | 09:50 | Thermal System Insulation (TSI) Tower 1, North Side | <i>6682017</i> | | | | X |
| 323-121818-04 | Dec 18, 2018 | 10:00 | Thermal System Insulation (TSI) Tower 2, South Side | <i>6682018</i> | | | | X |
| 323-121818-05 | Dec 18, 2018 | 10:09 | Thermal System Insulation (TSI) Tower 2, East Side | <i>6682019</i> | | | | X |
| 323-121818-06 | Dec 18, 2018 | 10:15 | Thermal System Insulation (TSI) Tower 2, 12"ø Pipe, North east side | <i>6682020</i> | | | | X |
| 323-121818-07 | Dec 18, 2018 | 10:23 | Thermal System Insulation (TSI) Tower 2, North Side | <i>6682021</i> | | | | X |
| 323-121818-08 | Dec 18, 2018 | 10:33 | Thermal System Insulation (TSI) Tower 3, North Side | <i>6682022</i> | | | | X |
| 323-121818-09 | Dec 18, 2018 | 10:37 | Thermal System Insulation (TSI) Tower 3, Distillation Unit, North Side | <i>6682023</i> | | | | X |
| 323-121818-10 | Dec 18, 2018 | 10:47 | Thermal System Insulation (TSI) Tower 3, South Side | <i>6682024</i> | | | | X |
| Turn Around Time: <i>X 3 day</i> | | | | Rush: _____ | | | | |
| Sample Collected by: <i>[Signature]</i> | | Received by: | | Relinquished by: | | Received at Lab by: <i>[Signature]</i> | | |
| Date: <i>Dec 18, 18</i> | Time: <i>10:18</i> | Date: <i>Dec 18, 18</i> | Time: <i>10:18</i> | Date: <i>Dec 18, 18</i> | Time: <i>10:18</i> | Date: <i>Dec 18, 18</i> | Time: <i>10:18</i> | |

[Handwritten notes and signatures]
 Date: *DEC 28 18*
 Time: *10:18*
 Date: *1-3-19*
 Time: *10:18*

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREP/

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180
 CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)



COCH: **323-121818-Bulk**
 Page 2 of 3

| Customer Name: | Homeno Recycling | Project Name: | Puerto Rico Olefines, Peñuelas | Job Number: | 18-323 | Remarks: | Bulk Samples for Asbestos | | | |
|-------------------|------------------|----------------|-----------------------------------|-------------------|---|----------------------|-----------------------------------|------------|------|------|
| Address: | Ponce PR | Total Samples: | 23 | EQB Inspector ID: | ASB-0918-0666-SI | Structure Address: | Road 127, Peñuelas Puerto Rico | | | |
| Phone/Fax/E-mail: | | Collected by: | <i>Carlos E. Ocasio Feliciano</i> | AIHA Lab ID: | IATL 100188 | Project Description: | Bulk Sampling for Asbestos Survey | | | |
| Analyzed by Lab: | | Sample No. | Date | Time | Sample Description | Wipe | Swab | Spore Trap | TCLP | Bulk |
| | | 323-121818-11 | Dec 18, 2018 | 10:58 | Thermal System Insulation (TSI) Tower 4, North Side | | 6682025 | | | X |
| | | 323-121818-12 | Dec 18, 2018 | 11:09 | Thermal System Insulation (TSI) Tower 4, South Side | | 6682026 | | | X |
| | | 323-121818-13 | Dec 18, 2018 | 11:20 | Thermal System Insulation (TSI) Tower 4, Pipe Insulation 10"Ø | | 6682027 | | | X |
| | | 323-121818-14 | Dec 18, 2018 | 11:30 | Thermal System Insulation (TSI) Tower 4, South West Side | | 6682028 | | | X |
| | | 323-121818-15 | Dec 18, 2018 | 11:41 | Thermal System Insulation (TSI) Tower 5, North Side | | 6682029 | | | X |
| | | 323-121818-16 | Dec 18, 2018 | 11:50 | Thermal System Insulation (TSI) Tower 5, East side | | 6682030 | | | X |
| | | 323-121818-17 | Dec 18, 2018 | 12:00 | Thermal System Insulation (TSI) Tower 5, South Side | | 6682031 | | | X |
| | | 323-121818-18 | Dec 18, 2018 | 13:05 | Thermal System Insulation (TSI) Tower 6, North Side | | 6682032 | | | X |
| | | 323-121818-19 | Dec 18, 2018 | 13:13 | Thermal System Insulation (TSI) Tower 6, North East Side | | 6682033 | | | X |
| | | 323-121818-20 | Dec 18, 2018 | 13:20 | Thermal System Insulation (TSI) Tower 6, South Side | | 6682034 | | | X |

Turn Around Time: X 3 day Rush: _____

| | | | | | | | |
|------------------------|-----------------------------------|------------------|--|--------------|--|---------------------|--|
| Sampling Collected by: | <i>Carlos E. Ocasio Feliciano</i> | Relinquished by: | | Received by: | | Delivery to Lab by: | |
| Date: | Dec 18, 18 | Date: | | Date: | | Date: | |
| Time: | 10:18, 18 | Time: | | Time: | | Time: | |

iATL 6682033

Sample not return

BEST ENVIRONMENTAL CONSULTANTS INC.
 ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
 WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
 ROAD 127, PEÑUELAS PUERTO RICO.
 WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
 PREI

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180

CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

Best Environmental Consultants Inc.

COCH#: **323-121818-Bulk**

Page 3 of 3

| | | | | |
|--|---|---|---|---|
| Customer Name: Homeco Recycling Ponce PR | Project Name: Puerto Rico Olefines, Peñuelas | Total Samples: 23 | Job Number: 18-323 | Remarks: |
| Phone/Fax/E-mail: | EOB Inspector ID: ASB-0918-0666-SI | Structure Address: Road 127, Peñuelas Puerto Rico | | |
| Collected by: Carlos E. Ocasio Feliciano | Structure Address: Road 127, Peñuelas Puerto Rico | | | |
| Analyzed by Lab: IATL | Structure Address: Road 127, Peñuelas Puerto Rico | | | |
| AHIA Lab ID: 100188 | Structure Address: Road 127, Peñuelas Puerto Rico | | | |
| Project Description: Bulk Sampling for Asbestos Survey | | | | |
| Sample No. | Date | Time | Sample Description | Sample Type: Wipe Swab Spore Trap TCLP Bulk |
| 323-121818-21 | Dec 18, 2018 | 13:38 | TK #1, Thermal System Insulation (TSI), North Side | 6682035 X |
| 323-121818-22 | Dec 18, 2018 | 13:59 | TK #1, Thermal System Insulation (TSI), North East Side | 6682036 X |
| 323-121818-23 | Dec 18, 2018 | 14:23 | TK #1, Thermal System Insulation (TSI), South Side | 6682037 X |
| <i>[Signature]</i> | | | | |
| Turn Around Time: X 3 day Rush: | | | | |
| Sampling Collected By: [Signature] | Relinquished by: | Received by: | Delivery to Lab by: | Received at Lab by: |
| Date: Dec 18, 2018 Time: 10:15 AM | Date: | Date: | Date: | Date: |
| Time: 10:15 AM | Time: | Time: | Time: | Time: |



COCH#: **323-121918-Bulk**
 Page 1 of 5

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180
 CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)



Best
 Environmental Consultants Inc.

| Customer Name: Homeca Recycling | | Project Name: Puerto Rico Oligfines, Peñueclas | | Job Number: 18-323 | | Remarks: | |
|---|--------------------|---|---|---|--------------|---------------------------------|--------------|
| Address: Ponce PR | | Total Samples: | | EQB Inspector ID: ASB-0918-0666-SI | | Structure Address: | |
| Phone/Fax/E-mail: | | Collected by: Carlos E. Ocasio Feliciano | | Structure Address: | | Bulk Sample for Asbestos | |
| Analyzed by Lab: IATL | | ABIA Lab ID: 100188 | | Structure Address: | | Bulk Sample for Asbestos | |
| ABIA Lab ID: 100188 | | Structure Address: | | Structure Address: | | Bulk Sample for Asbestos | |
| Project Description: Bulk Sampling for Asbestos Survey | | | | | | | |
| Sample No. | Date | Time | Sample Description | Wipe | Swab | Spore Trap | TCLP |
| 323-121918-24 | Dec 19, 2018 | 10:00 | Thermal System Insulation (TSI) Tower 7, South Side | | 6682038 | | X |
| 323-121918-25 | Dec 19, 2018 | 10:08 | Thermal System Insulation (TSI) Tower 7, North Side | | 6682039 | | X |
| 323-121918-26 | Dec 19, 2018 | 10:13 | Thermal System Insulation (TSI) Tower 7, Interior Pipe 24"ø South East Side | | 6682040 | | X |
| 323-121918-27 | Dec 19, 2018 | 10:30 | Thermal System Insulation (TSI) Tank 2, North Side | | 6682041 | | X |
| 323-121918-28 | Dec 19, 2018 | 10:41 | Thermal System Insulation (TSI) Tank 2, North Side | | 6682042 | | X |
| 323-121918-28A | Dec 19, 2018 | 10:50 | Thermal System Insulation (TSI) Tank 2, 10"ø Pipe, East side | | 6682043 | | X |
| 323-121918-28B | Dec 19, 2018 | 11:00 | Thermal System Insulation (TSI) Tank 2, 10"ø Pipe, East side | | 6682044 | | X |
| 323-121918-29 | Dec 19, 2018 | 11:33 | Thermal System Insulation (TSI) Tank 2, South Side | | 6682045 | | X |
| 323-121918-30 | Dec 19, 2018 | 11:38 | Thermal System Insulation (TSI) Tank 3, South Side | | 6682046 | | X |
| 323-121918-31 | Dec 19, 2018 | 11:47 | Thermal System Insulation (TSI) Tank 3, North Side | | 6682047 | | X |
| Turn Around Time: X 3 day Rush: _____ | | | | | | | |
| Sampling Collected by: [Signature] | | Relinquished by: [Signature] | | Received by: | | Received at Lab by: | |
| Date: Dec 19, 2018 | Time: 11:47 | Date: | Time: | Date: | Time: | Date: | Time: |

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180

Environmental Consultants Inc.

CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

COCH#: **323-121918-Bulk** Page 2 of 5

| Customer Name: <i>Honessa Recycling</i> | | Project Name: <i>Puerto Rico Olefines, Peñuelas</i> | | | | | |
|--|------------------------|---|---|--------------|------|------------|---|
| Address: <i>Ponce PR</i> | | Job Number: <i>18-323</i> | | | | | |
| Phone/Fax/E-mail: | | Total Samples: <i>ASB-0918-0666-SI</i> | | | | | |
| Collected by: <i>Carlos E. Ocasio Feliciano</i> | | EQB Inspector ID: | | | | | |
| Analyzed by Lab: <i>IATL</i> | | Structure Address: <i>Bulk Sample for Asbestos</i> | | | | | |
| AIHA Lab ID: <i>100188</i> | | Road 127, Peñuelas Puerto Rico | | | | | |
| Project Description: <i>Bulk Sampling for Asbestos Survey, The Samples ID 323-121918-36, 37, 38 & 53 Were Skipped.</i> | | | | | | | |
| Sample No. | Date | Time | Sample Description | Sample Type: | | | |
| | | | | Wipe | Swab | Spore Trap | |
| 323-121918-32 | Dec 19, 2018 | 11:50 | Thermal System Insulation (TSI) Tank 4, North Side | 6682048 | | | X |
| 323-121918-33 | Dec 19, 2018 | 11:58 | Thermal System Insulation (TSI) Tank 4, West Side | 6682040 | | | X |
| 323-121918-34 | Dec 19, 2018 | 13:10 | Thermal System Insulation (TSI) Tower 7, Interior Pipe 24"ø South East Side | 6682050 | | | X |
| 323-121918-35 | Dec 19, 2018 | 13:20 | Thermal System Insulation (TSI) Tank 2, North Side | 6682051 | | | X |
| 323-121918-39 | Dec 19, 2018 | 13:33 | Thermal System Insulation (TSI) Tank 6, South Side | 6682052 | | | X |
| 323-121918-40 | Dec 19, 2018 | 13:38 | Thermal System Insulation (TSI) Tank 6, West Side | 6682053 | | | X |
| 323-121918-41 | Dec 19, 2018 | 13:50 | Thermal System Insulation (TSI) Tank 6, North Side | 6682054 | | | X |
| 323-121918-42 | Dec 19, 2018 | 14:33 | Thermal System Insulation (TSI) Tower 9, South Side | 6682055 | | | X |
| 323-121918-43 | Dec 19, 2018 | 14:38 | Thermal System Insulation (TSI) Tower 9, North Side | 6682056 | | | X |
| 323-121918-44 | Dec 19, 2018 | 14:45 | Thermal System Insulation (TSI) Tower 9, South East Side | 6682057 | | | X |
| Turn Around Time: X 3 day Rush: _____ | | | | | | | |
| Sample Collected By: <i>Carlos E. Ocasio Feliciano</i> | Relinquished by: _____ | Received by: _____ | Received at Lab by: _____ | | | | |
| Date: <i>Dec 19, 2018</i> | Date: _____ | Date: _____ | Date: _____ | | | | |
| Time: _____ | Time: _____ | Time: _____ | Time: _____ | | | | |



Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180
 CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

COC#: **323-121918-Bulk**
 Page 3 of 5

Best Environmental Consultants Inc.



| Customer Name: Homisca Recycling | | Project Name: Puerto Rico Olefines, Peñuelas | | Job Number: /18-323 | | Remarks: | |
|--|--------------|---|---|----------------------------|---------|----------------------------|------|
| Address: Ponce PR | | Total Samples: 23 | | ASB-0918-0666-SI | | | |
| Phone/Fax/E-mail: | | EOB Inspector ID: | | Structure Address: | | | |
| Collected by: Carlos E. Ocasio Falciano | | Structure Address: | | Structure Address: | | | |
| Analyzed by Lab: IATZ | | Structure Address: | | Structure Address: | | | |
| AIHA Lab ID: 100188 | | Structure Address: | | Structure Address: | | | |
| Project Description: Bulk Sampling for Asbestos Survey, The Samples ID 323-121918-36, 37, 38 & 53 Were Skipped. | | | | | | | |
| Sample No. | Date | Time | Sample Description | Sample Type: | | | |
| | | | | Wipe | Swab | Spore Trap | Bulk |
| 323-121918-45 | Dec 19, 2018 | 11:50 | Thermal System Insulation (TSI) Tower 10, North East Side | | 6682058 | | X |
| 323-121918-46 | Dec 19, 2018 | 11:58 | Thermal System Insulation (TSI), 8"ø, Tower 10, North East Side | | 6682059 | | X |
| 323-121918-47 | Dec 19, 2018 | 13:10 | Thermal System Insulation (TSI) Tower 10, North East Side | | 6682060 | | X |
| 323-121918-48 | Dec 19, 2018 | 13:15 | Thermal System Insulation (TSI) Tower 11, North East Side | | 6682061 | | X |
| 323-121918-49 | Dec 19, 2018 | 13:21 | Thermal System Insulation (TSI) Tower 11, South Side | | 6682062 | | X |
| 323-121918-50 | Dec 19, 2018 | 13:33 | Thermal System Insulation (TSI) Tower 11, North Side | | 6682063 | | X |
| 323-121918-51 | Dec 19, 2018 | 13:40 | Thermal System Insulation (TSI) Pipe 6ø, Front Side, Tower 13 | | 6682064 | | X |
| 323-121918-52 | Dec 19, 2018 | 13:50 | Thermal System Insulation (TSI) Pipe 6ø, Front Side, Tower 13 | | 6682065 | | X |
| 323-121918-54 | Dec 19, 2018 | 14:13 | Thermal System Insulation (TSI) Tower 12, South Side | | 6682066 | | X |
| 323-121918-55 | Dec 19, 2018 | 14:20 | Thermal System Insulation (TSI) Tower 12, North Side | | 6682067 | | X |
| Turn Around Time: X 3 day | | | | Rush: | | | |
| Sampling Collected by: [Signature] | | Received by: | | Relinquished by: | | Received at Lab by: | |
| Date: Dec 19, 2018 | | Date: | | Date: | | Date: | |
| Time: | | Time: | | Time: | | Time: | |

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180

CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

COCH#: **323-121918-Bulk**
 Page 4 of 5



Best Environmental Consultants Inc.

| Customer Name: <i>Homecca Recycling</i> | | Project Name: <i>Puerto Rico Olefina, Peñuelas</i> | | Job Number: <i>18-223</i> | | | | | |
|---|--------------|--|--|--|-------------|---------------------|-------------|------|--|
| Address: <i>Ponce PR</i> | | Total Samples: | | Remarks: | | | | | |
| Phone/Fax/E-mail: | | EQB Inspector ID: <i>ASB-0918-0666-SI</i> | | Structure Address: <i>Bulk Sample for Asbestos</i> | | | | | |
| Collected by: <i>Carlos E. Ocasio Feliciano</i> | | Structure Address: <i>Road 127, Peñuelas Puerto Rico</i> | | | | | | | |
| Analyzed by Lab: <i>LATL</i> | | Project Description: <i>Bulk Sampling for Asbestos Survey.</i> | | | | | | | |
| AIHA Lab ID: <i>100188</i> | | | | | | | | | |
| Sample No. | Date | Time | Sample Description | Wipe | Swab | Spore Trap | TCLP | Bulk | |
| 323-121918-56 | Dec 19, 2018 | 14:30 | Thermal System Insulation (TSI) Tower 12, West Side | 6682068 | | | | X | |
| 323-121918-57 | Dec 19, 2018 | 14:38 | Thermal System Insulation (TSI), 6"ø, Tower 13, North Side | 6682069 | | | | X | |
| 323-121918-58 | Dec 19, 2018 | 14:50 | Thermal System Insulation (TSI) Tower 13, West Side | 6682070 | | | | X | |
| 323-121918-59 | Dec 19, 2018 | 13:15 | Thermal System Insulation (TSI) Tower 13, South Side | 6682071 | | | | X | |
| 323-121918-60 | Dec 19, 2018 | 13:21 | Thermal System Insulation (TSI) Tank 5, South Side | 6682072 | | | | X | |
| 323-121918-61 | Dec 19, 2018 | 13:33 | Thermal System Insulation (TSI) Tank 5, North Side | 6682073 | | | | X | |
| 323-121918-62 | Dec 19, 2018 | 13:40 | Thermal System Insulation (TSI) Tank 6, North East Side | 6682074 | | | | X | |
| 323-121918-63 | Dec 19, 2018 | 13:50 | Thermal System Insulation (TSI) Tank 6, North Side | 6682075 | | | | X | |
| 323-121918-64 | Dec 19, 2018 | 14:13 | Thermal System Insulation (TSI) Tank 7, North East Side | 6682076 | | | | X | |
| 323-121918-65 | Dec 19, 2018 | 14:20 | Thermal System Insulation (TSI) Tank 7, North Side | 6682077 | | | | X | |
| Turn Around Time: <i>X_3 day</i> | | Rush: _____ | | | | | | | |
| Sampling Collected by: <i>Carlos Ocasio</i> | | Received by: | | Delivery to Lab by: | | Received at Lab by: | | | |
| Date: <i>Dec 19, 2018</i> | Time: _____ | Date: _____ | Time: _____ | Date: _____ | Time: _____ | Date: _____ | Time: _____ | | |

13/19
1-4-19

Best Environmental Consultants Inc.
 PO BOX 560180, GUAYANILLA PR 00656-0180

CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

COC#: **323-121918-Bulk**
 Page 5 of 5



Best Environmental Consultants Inc.

| Customer Name: <i>Homena Recycling</i> | | Project Name: <i>Puerto Rico Oligines, Peñuelas</i> | | Job Number: <i>18-323</i> | | |
|---|--------------------|--|--|--|---------------------------|-------------------|
| Address: <i>Ponce PR</i> | | Total Samples: | | Remarks: | | |
| Phone/Fax/E-mail: | | EQB Inspector ID: <i>ASB-09/18-0666-SI</i> | | Structure Address: <i>Road 127, Peñuelas Puerto Rico</i> | | |
| Collected by: <i>Carlos E. Ocasio Feliciano</i> | | AIHA Lab ID: <i>100188</i> | | Bulk Sample for Asbestos | | |
| Analyzed by Lab: <i>IATL</i> | | Project Description: <i>Bulk Sampling for Asbestos Survey.</i> | | | | |
| Sample No. | Date | Time | Sample Description | Sample Type | | |
| | | | | Wipe | Swab | Spore Trap / TCLP |
| 323-121918-66 | Dec 19, 2018 | 14:30 | Thermal System Insulation (TS) 12" ø, Fin Fan Air Cooler | | <i>6682078</i> | X |
| 323-121918-67 | Dec 19, 2018 | 14:38 | Thermal System Insulation (TS) 10" ø, Fin Fan Air Cooler | | <i>6682079</i> | X |
| 323-121918-68 | Dec 19, 2018 | 15:00 | Boiler #6, Fireproofing Cloth Between metal walls | | <i>6682080</i> | X |
| 323-121918-69 | Dec 19, 2018 | 15:15 | Boiler #6, Inside Wall Insulation(white) | | <i>6682081</i> | X |
| 323-121918-70 | Dec 19, 2018 | 15:40 | Boiler #6, Inside Brick Sample | | <i>6682082</i> | X |
| 323-121918-71 | Dec 19, 2018 | 15:52 | Boiler #5, Inside Wall Insulation(white) | | <i>6682083</i> | X |
| 323-121918-72 | Dec 19, 2018 | 16:10 | Boiler #5, Inside Wall Insulation(brown) | | <i>6682084</i> | X |
| 323-121918-73 | Dec 19, 2018 | 16:30 | Boiler #2, Inside Brick Sample | | <i>6682085</i> | X |
| 323-121918-74 | Dec 19, 2018 | 17:13 | Boiler #2, Inside Wall Insulation(brown and white) | | <i>6682086</i> | X |
| Turn Around Time: <i>X 3 day</i> | | Rush: _____ | | | | |
| Sampled Collected by: <i>[Signature]</i> | Received by: _____ | Relinquished by: _____ | Received by: _____ | Delivery to Lab by: _____ | Received at Lab by: _____ | |
| Date: <i>Dec 19, 18</i> | Date: _____ | Date: _____ | Date: _____ | Date: _____ | Date: _____ | |
| Time: <i>10:00 A.M.</i> | Time: _____ | Time: _____ | Time: _____ | Time: _____ | Time: _____ | |



Best Environmental Consultants Inc.

PO BOX 560180, GUAYANILLA PR 00656-0180

CHAIN OF CUSTODY (TRANSMITTAL SHEET FOR SAMPLES)

Best Environmental Consultants Inc.



Environmental Consultants Inc.

COCH: **323-121918-Bulk**

Page 4 of 5

| Customer Name: <i>Honaca Recycling</i> | | Project Name: <i>Puerto Rico Oligines, Peñuelas</i> | | Job Number: <i>18-323</i> | | | | |
|--|--------------------|--|---|---------------------------|-------------|------------|------|------|
| Address: <i>Ponce PR</i> | | Total Samples: | | Remarks: | | | | |
| Phone/Fax/E-mail: | | FQB Inspector ID: <i>ASB-0918-0666-SJ</i> | | Bulk Sample for Asbestos | | | | |
| Collected by: <i>Carlos E. Ocasio Feliciano</i> | | Structure Address: <i>Road 127, Peñuelas Puerto Rico</i> | | | | | | |
| Analyzed by Lab: <i>IATL</i> | | | | | | | | |
| AIHA Lab ID: <i>100188</i> | | | | | | | | |
| Project Description: <i>Bulk Sampling for Asbestos Survey.</i> | | | | | | | | |
| Sample No. | Date | Time | Sample Description | Sample Type: | | | | |
| | | | | Wipe | Swab | Spore Trap | TCLP | Bulk |
| 323-121918-56 | Dec 19, 2018 | 14:30 | Thermal System Insulation (TSI) Tower 12, West Side | | 6682068 | | | X |
| 323-121918-57 | Dec 19, 2018 | 14:38 | Thermal System Insulation (TSI), 6" ø, Tower 13, North Side | | 6682069 | | | X |
| 323-121918-58 | Dec 19, 2018 | 14:50 | Thermal System Insulation (TSI) Tower 13, West Side | | 6682070 | | | X |
| 323-121918-59 | Dec 19, 2018 | 13:15 | Thermal System Insulation (TSI) Tower 13, South Side | | 6682071 | | | X |
| 323-121918-60 | Dec 19, 2018 | 13:21 | Thermal System Insulation (TSI) Tank 5, South Side | | 6682072 | | | X |
| 323-121918-61 | Dec 19, 2018 | 13:33 | Thermal System Insulation (TSI) Tank 5, North Side | | 6682073 | | | X |
| 323-121918-62 | Dec 19, 2018 | 13:40 | Thermal System Insulation (TSI) Tank 6, North East Side | | 6682074 | | | X |
| 323-121918-63 | Dec 19, 2018 | 13:50 | Thermal System Insulation (TSI) Tank 6, North Side | | 6682075 | | | X |
| 323-121918-64 | Dec 19, 2018 | 14:13 | Thermal System Insulation (TSI) Tank 7, North East Side | | 6682076 | | | X |
| 323-121918-65 | Dec 19, 2018 | 14:20 | Thermal System Insulation (TSI) Tank 7, North Side | | 6682077 | | | X |
| Turn Around Time: X 3 day Rush: _____ | | | | | | | | |
| Sampling Collected by: <i>Carlos E. Ocasio Feliciano</i> | | Received by: | | Received at Lab by: | | | | |
| Date: <i>Dec 19, 18</i> | Time: <i>14:18</i> | Date: _____ | Time: _____ | Date: _____ | Time: _____ | | | |

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ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
WORK AREA AT TALLABOA INDUSTRIAL PARK (FORMERLY PR OLEFINS)
ROAD 127, PEÑUELAS PUERTO RICO.
WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

APPENDIX IV

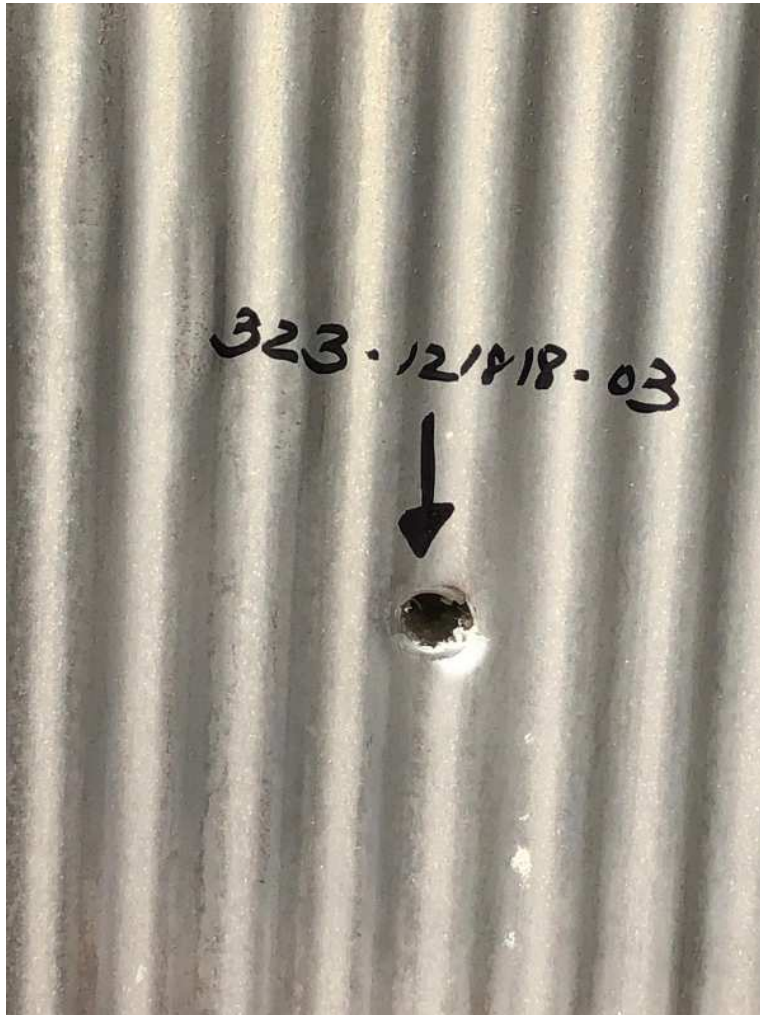
REPRESENTATIVE PHOTOS



General View Sampling Point #1, TSI Tower #1 South Side



General View Sampling Point #2, TSI Tower #1 East Side



General View Sampling Point #3, TSI Tower #1 North Side



General View Sampling Point #4, TSI Tower #2 South Side



General View Sampling Point #5, TSI Tower #2 East Side



General View Sampling Point #6, TSI Tower #2, 12'' \varnothing Pipe, Northeast Side



General View Sampling Point #7, TSI Tower #2, North Side.



General View Sampling Point #8, TSI Tower #3, North Side.



General View Sampling Point #9, TSI Tower #3, Distillation Unit North Side.



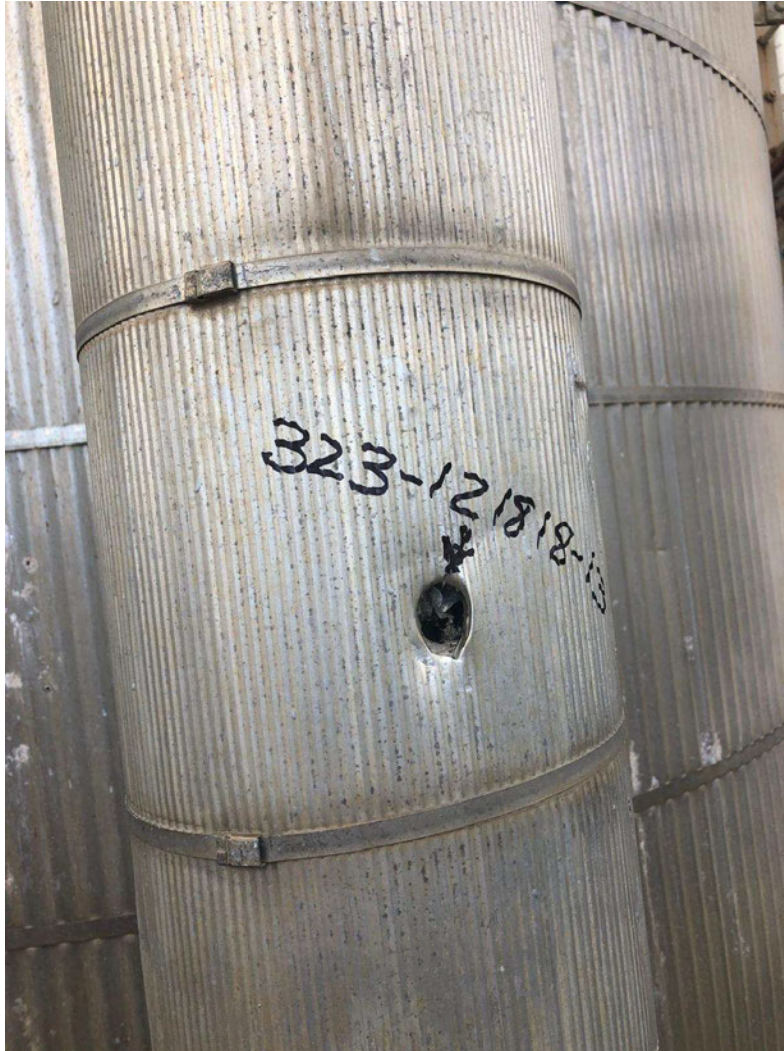
General View Sampling Point #10, TSI Tower #3, South Side



General View Sampling Point #11, TSI Tower #4, North Side



General View Sampling Point #12, TSI Tower #4, South Side



General View Sampling Point #13, TSI Tower #4, Pipe Insulation 10'Ø
South Side.



General View Sampling Point #14, TSI Tower #4,
Southwest Side.



General View Sampling Point #15, TSI Tower #5,
North Side.



General View Sampling Point #15, TSI Tower #5,
East Side.



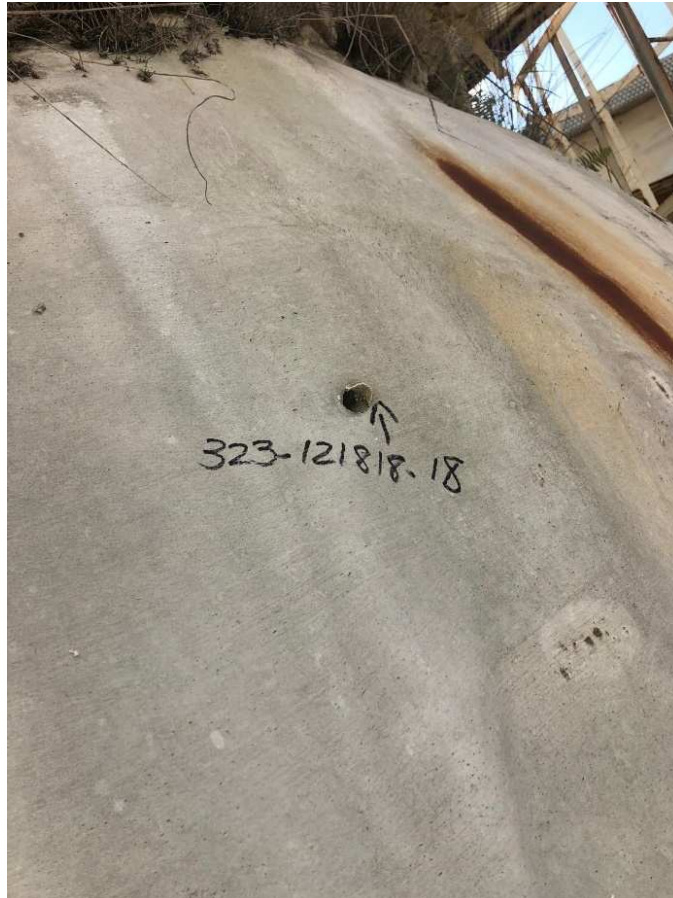
General View Sampling Point #15, TSI Tower #5,
South Side.



General View Sampling Point #16, TSI Tower #5,
East Side.



General View Sampling Point #17, TSI Tower #6,
South Side.



General View Sampling Point #18, TSI Tower #6,
North Side.

JANUARY 29, 2019

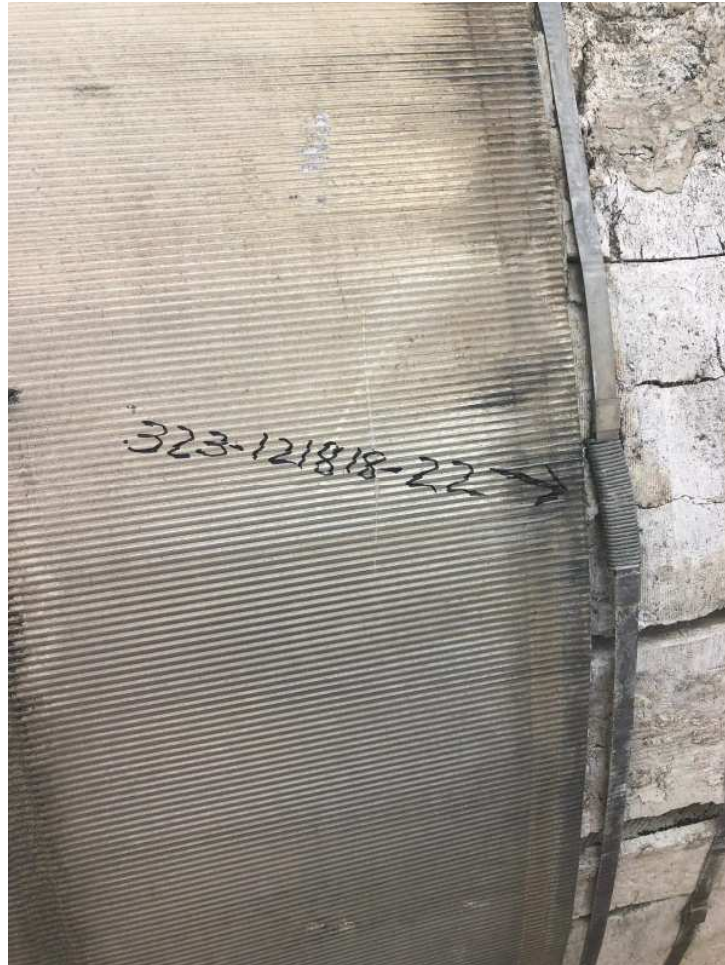


General View Sampling Point #19, TSI Tower #6,
Northeast Side.

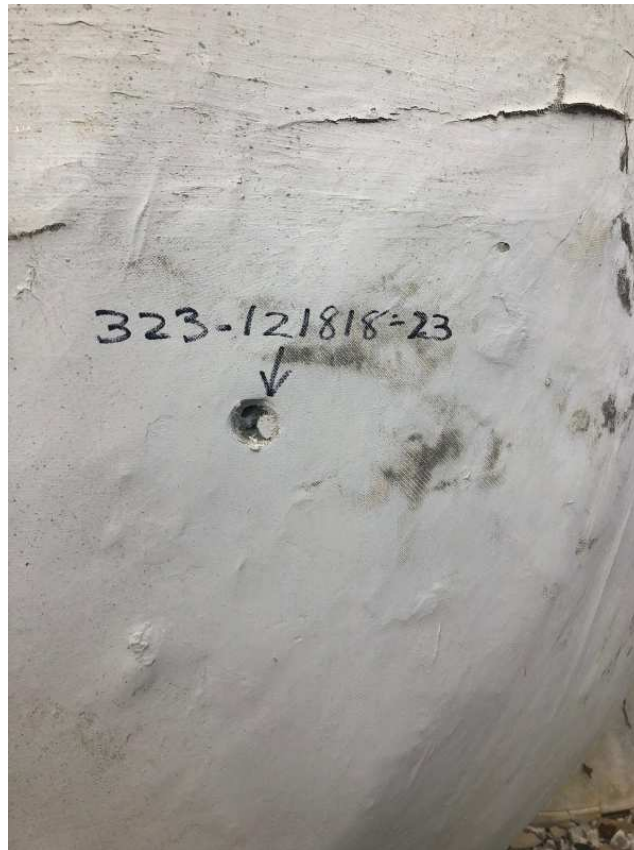
JANUARY 29, 2019



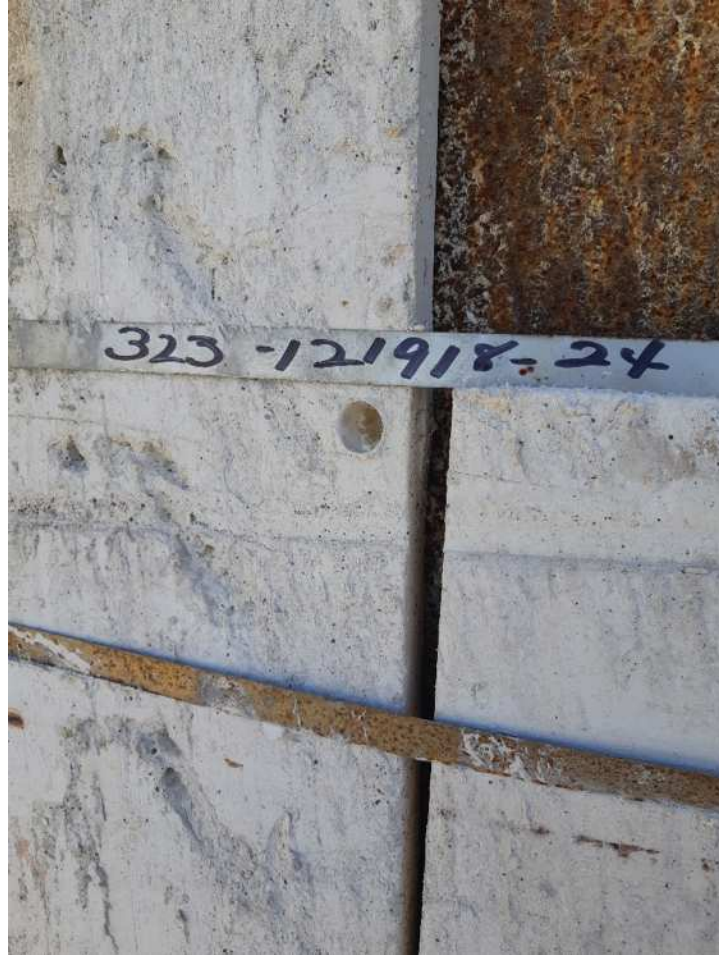
General View Sampling Point #20, TSI Tower #6,
South Side.



General View Sampling Point #22, TSI Tank #1,
Northeast Side.



General View Sampling Point #23, TSI Tank #1,
South Side.



General View Sampling Point #24, TSI Tower 7,
South Side.



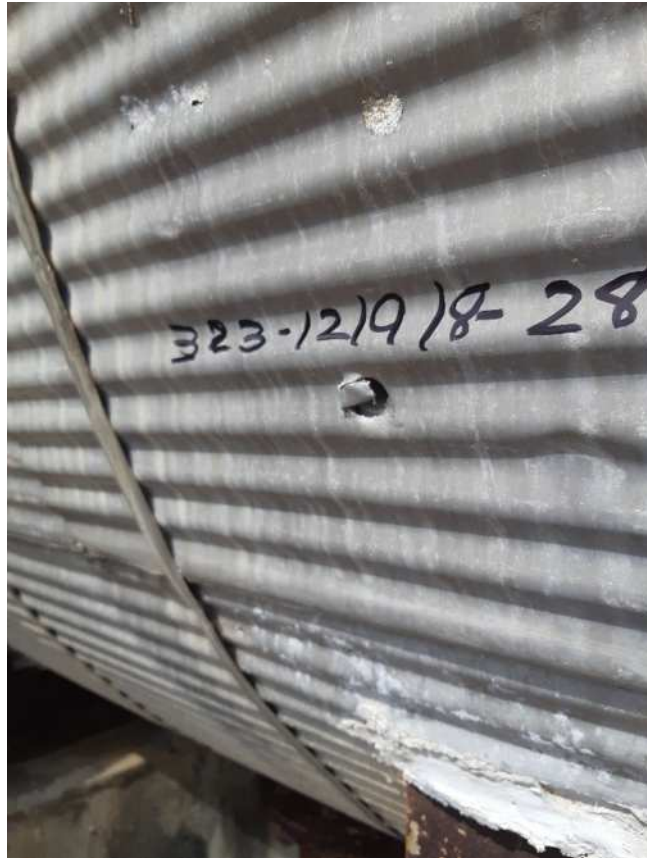
General View Sampling Point #25, TSI Tower 7,
North Side.



General View Sampling Point #26, TSI Interior Pipe 24'' ϕ ,
Southeast Side.



General View Sampling Point #27, Tank 2 TSI,
North Side.



General View Sampling Point #28, Tank 2 TSI,
North Side.



General View Sampling Point #28A, Tank 2, 10' \varnothing TSI,
East Side.

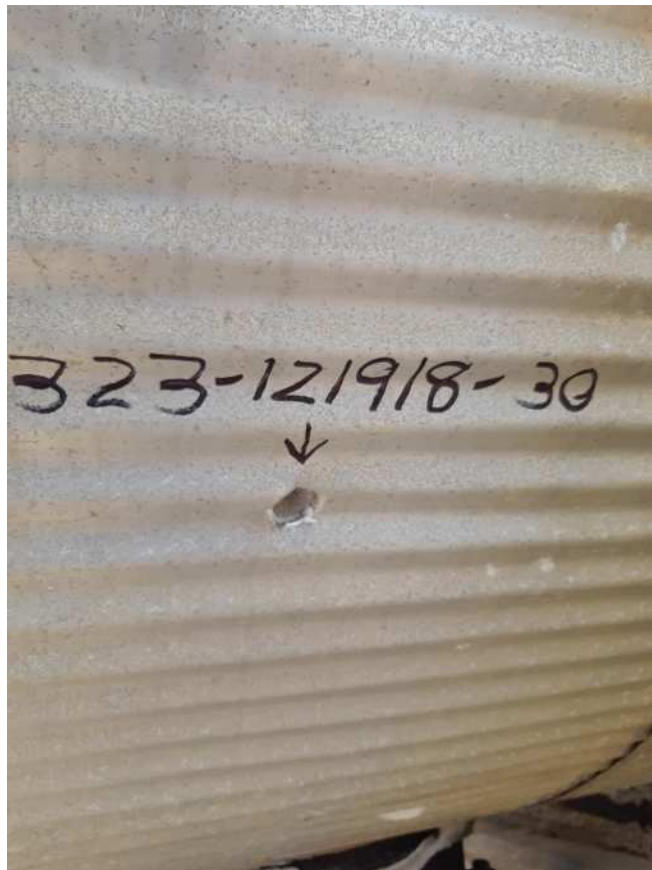


General View Sampling Point #28B, Tank 2, 10' ϕ TSI,
East Side.

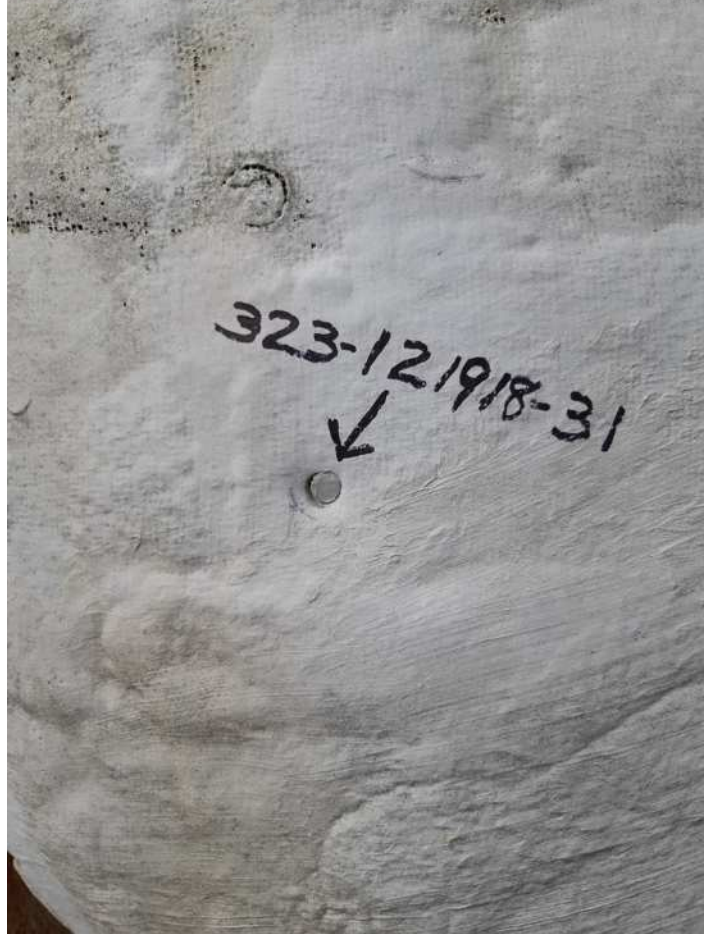
JANUARY 29, 2019



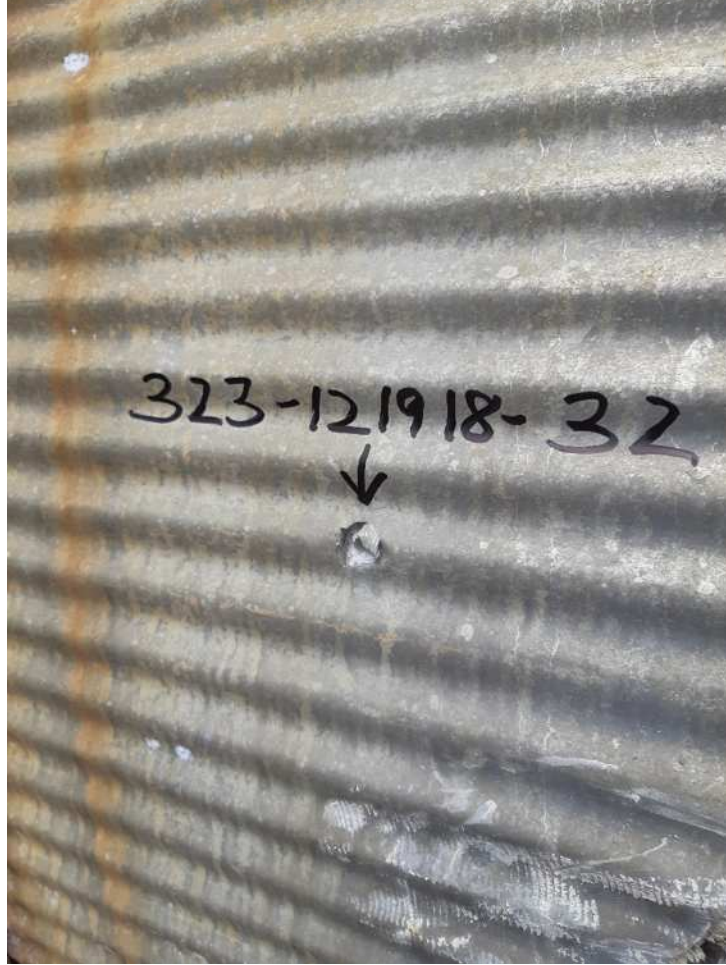
General View Sampling Point #29, Tank 2 TSI,
South Side.



General View Sampling Point #30, Tank 3 TSI,
South Side.

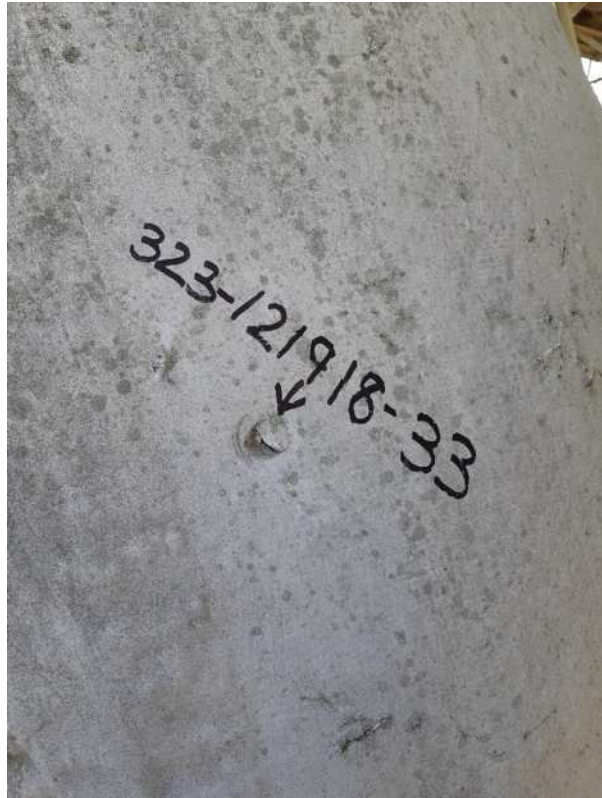


General View Sampling Point #31, Tank 3 TSI,
North Side.

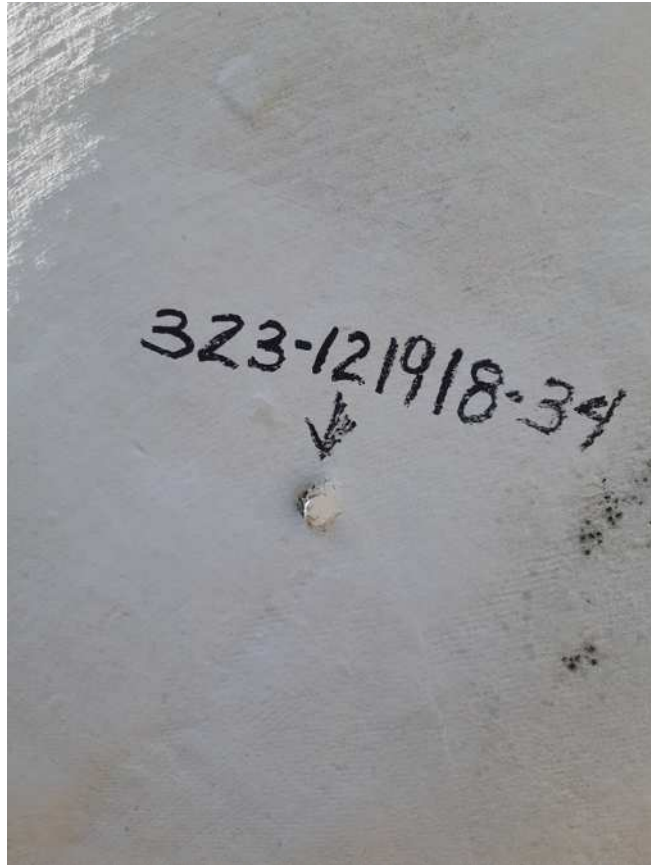


General View Sampling Point #32, Tank 4 TSI,
North Side.

JANUARY 29, 2019

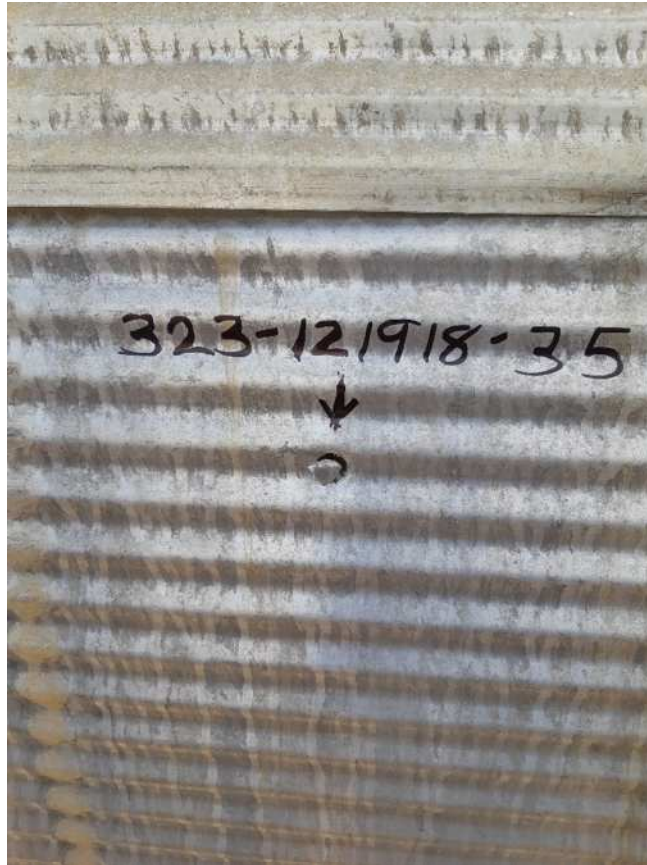


General View Sampling Point #33, Tank 4 TSI,
West Side.



General View Sampling Point #34, Tower 7 TSI, Interior Pipe
24'' ϕ Southeast Side.

JANUARY 29, 2019



General View Sampling Point #35, Tank 2 TSI, North Side.
(Picture sampling point #36 #37 & 38 not available)



General View Sampling Point #39, Tank 6 TSI, South Side.



General View Sampling Point #40, Tank 6 TSI, West Side.



General View Sampling Point #41, Tank 6 TSI, North Side.



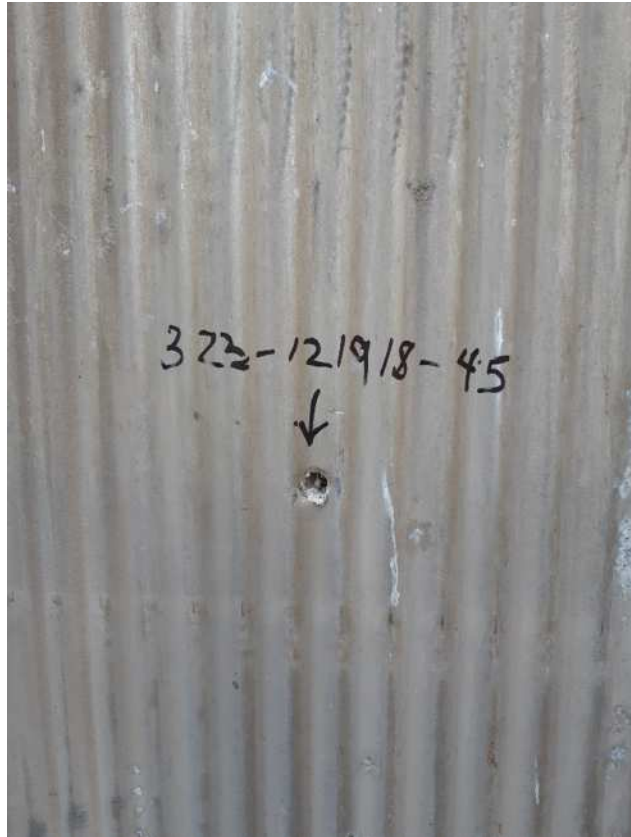
General View Sampling Point #42, Tower 9 TSI, South Side.



General View Sampling Point #43, Tower 9 TSI, North Side.



General View Sampling Point #44, Tower 9 TSI, Southeast Side.



General View Sampling Point #45, Tower 10 TSI, Northeast Side.



General View Sampling Point #46, 8'' \varnothing Pipe, Tower 10 TSI, Northeast Side.



General View Sampling Point #47, 8'' ϕ Pipe, Tower 10 TSI, Northeast Side.



General View Sampling Point #48, Tower 11 TSI, Northeast Side.



General View Sampling Point #49, Tower 11 TSI, South Side.



General View Sampling Point #50, Tower 11 TSI, North Side.

General View Sampling Point #51& 52, Front Side Pipe 6'' ϕ , Tower 13





General View Sampling Point #54, Tower 12, South Side



General View Sampling Point #55, Tower 12, North Side



General View Sampling Point #56, Tower 12, West Side



General View Sampling Point #57, TSI 6'ø, Tower 13, North Side



General View Sampling Point #58, Tower 13, West Side



General View Sampling Point #59, Tower 13, South Side



General View Sampling Point #60, Tank 5, South Side



General View Sampling Point #61, Tank 5, North Side



General View Sampling Point #62, Tank 6, Northeast Side



General View Sampling Point #63, Tank 6, North Side



General View Sampling Point #64, Tank 7, Northeast Side



General View Sampling Point #65, Tank 7, North Side



General View Sampling Point #66, Pipe Insulation 12'' ϕ , Fin Fan Air Cooler



General View Sampling Point #67, Pipe Insulation 10'' ϕ , Fin Fan Air Cooler



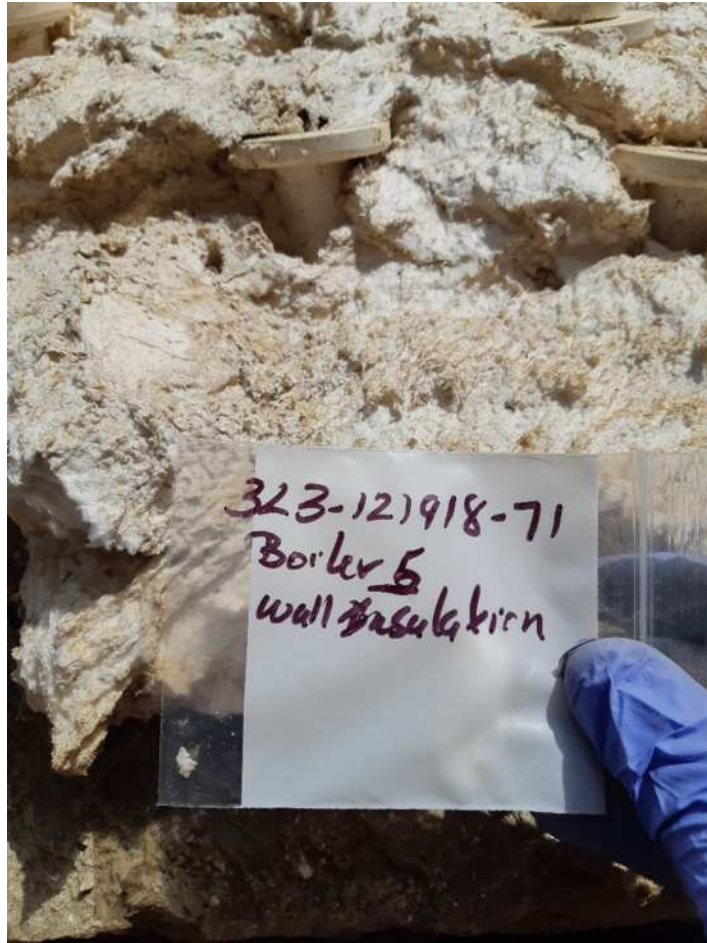
General View Sample # 68, Boiler #6, Fireproofing Cloth Between Metal Walls



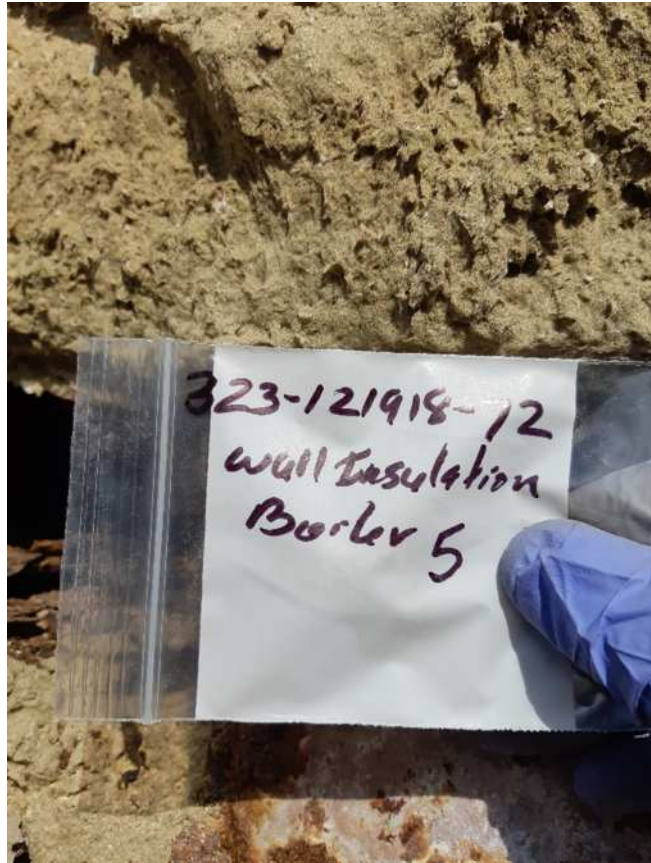
General View Sample # 69, Boiler #6, Inside Insulation Wall(white).



General View Sample # 70, Boiler #6, Inside Brick.



General View Sample # 71, Boiler #5, Inside Insulation Wall(white).

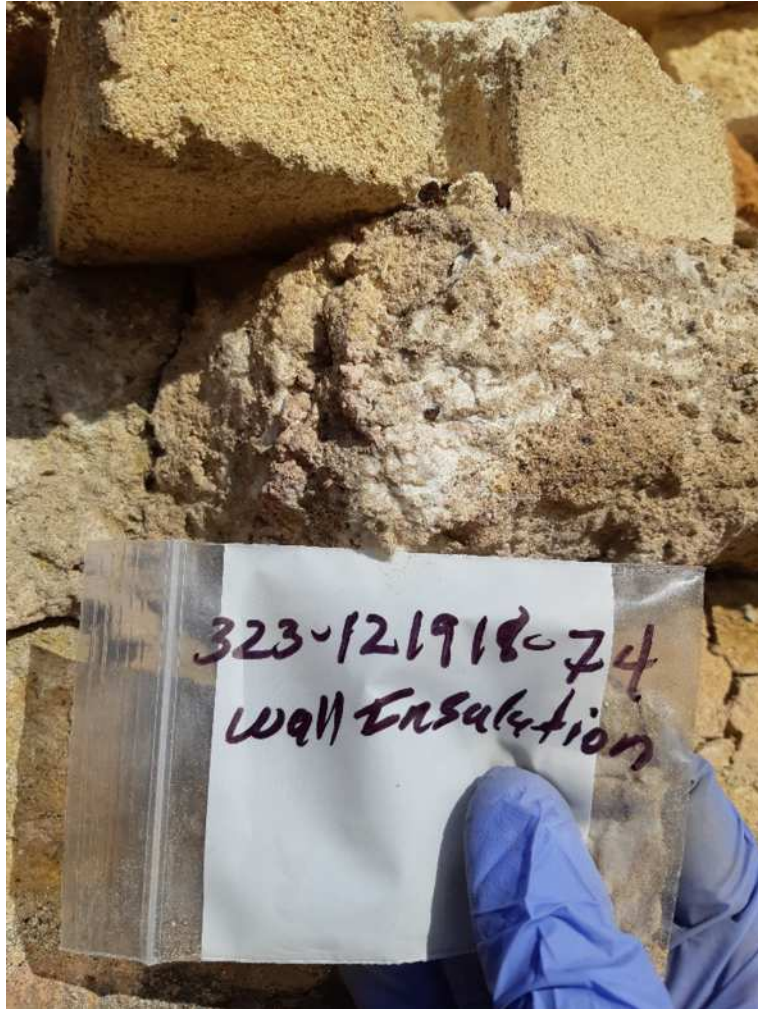


General View Sample # 72, Boiler #5, Inside Wall Insulation (brown).

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General View Sample # 73, Boiler #2, Inside Brick.



General View Sample # 74, Boiler #2, Inside Wall Insulation (brown).

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ENVIRONMENTAL SURVEY AND ASSESSMENT FOR ACM
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WORK PLAN APPROVED BY EPA, REFERENCE NO. CAA-02-2014-1009
PREPARED FOR: HOMECA RECYCLING CENTER

JANUARY 29, 2019

APPENDIX V

SCHEMATIC DISTRIBUTION OF ACM SAMPLING POINTS

JANUARY 29, 2019



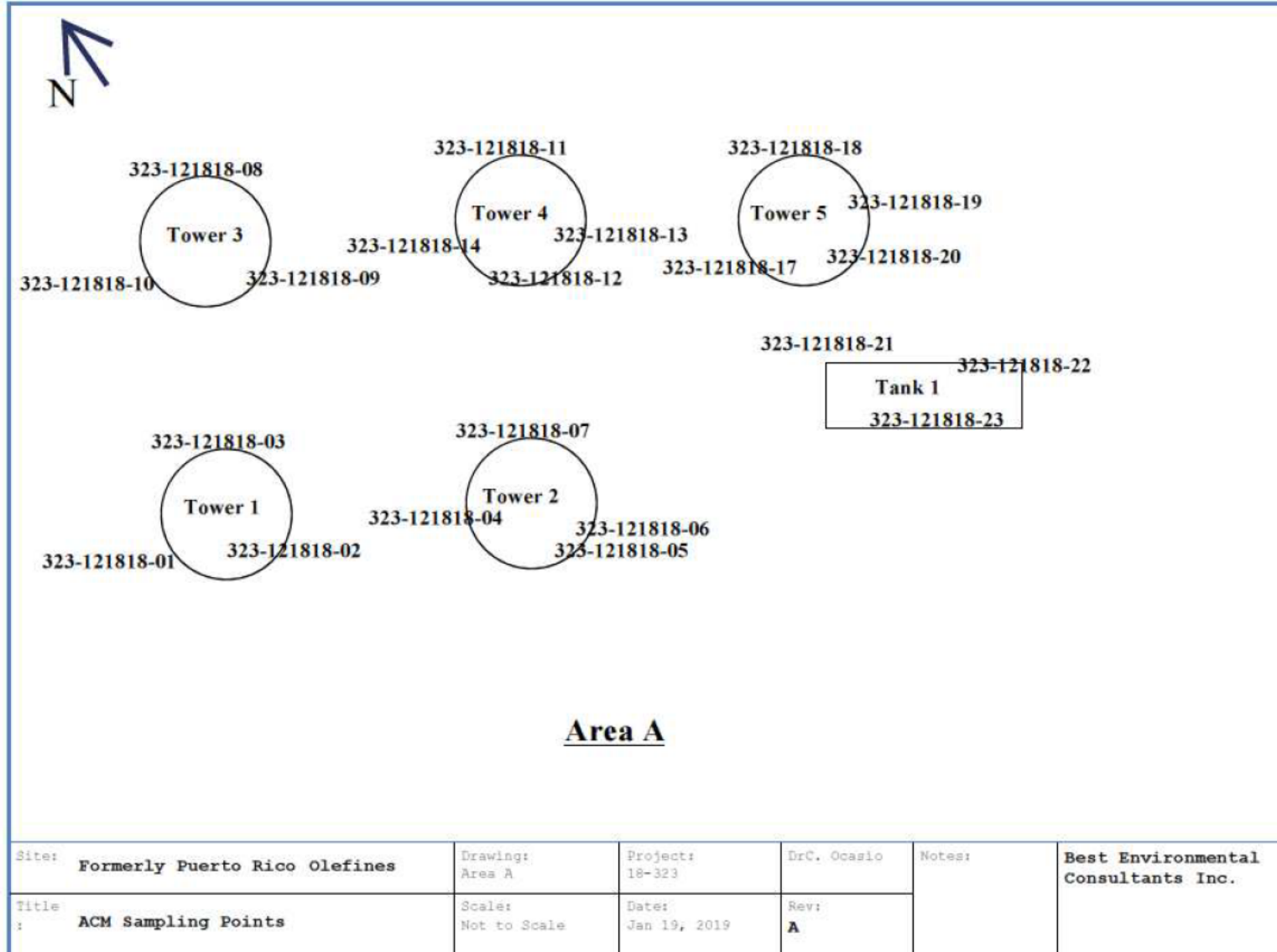
138-148



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JANUARY 29, 2019



| | | | | | | | | |
|--------|-------------------------------|----------|--------------|----------|--------------|---------------|--------|-------------------------------------|
| Site: | Formerly Puerto Rico Olefines | Drawing: | Area A | Project: | 18-323 | Dr. C. Ocasio | Notes: | Best Environmental Consultants Inc. |
| Title: | ACM Sampling Points | Scale: | Not to Scale | Date: | Jan 19, 2019 | Rev: | A | |

139-148

JANUARY 29, 2019



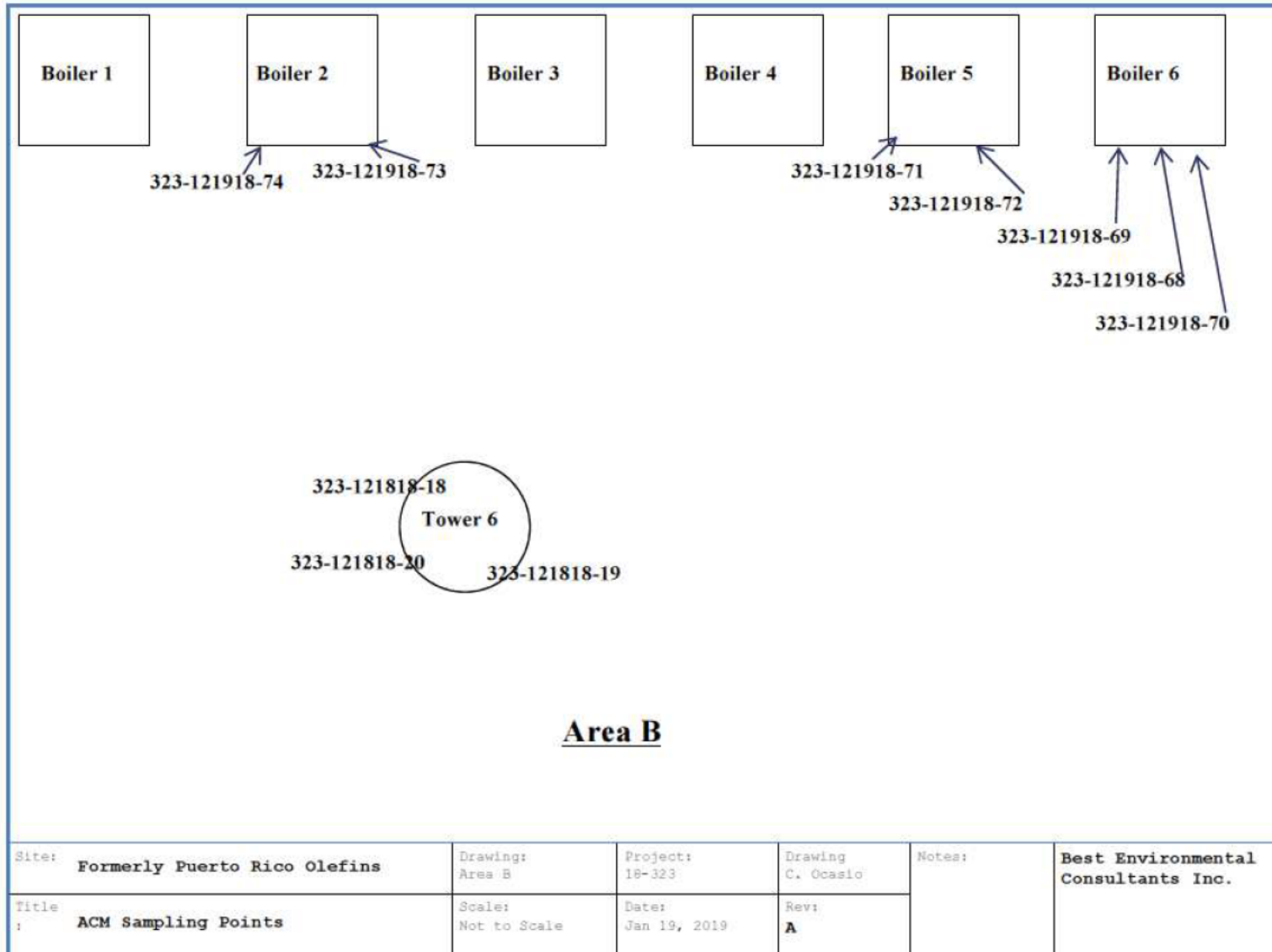
140-140



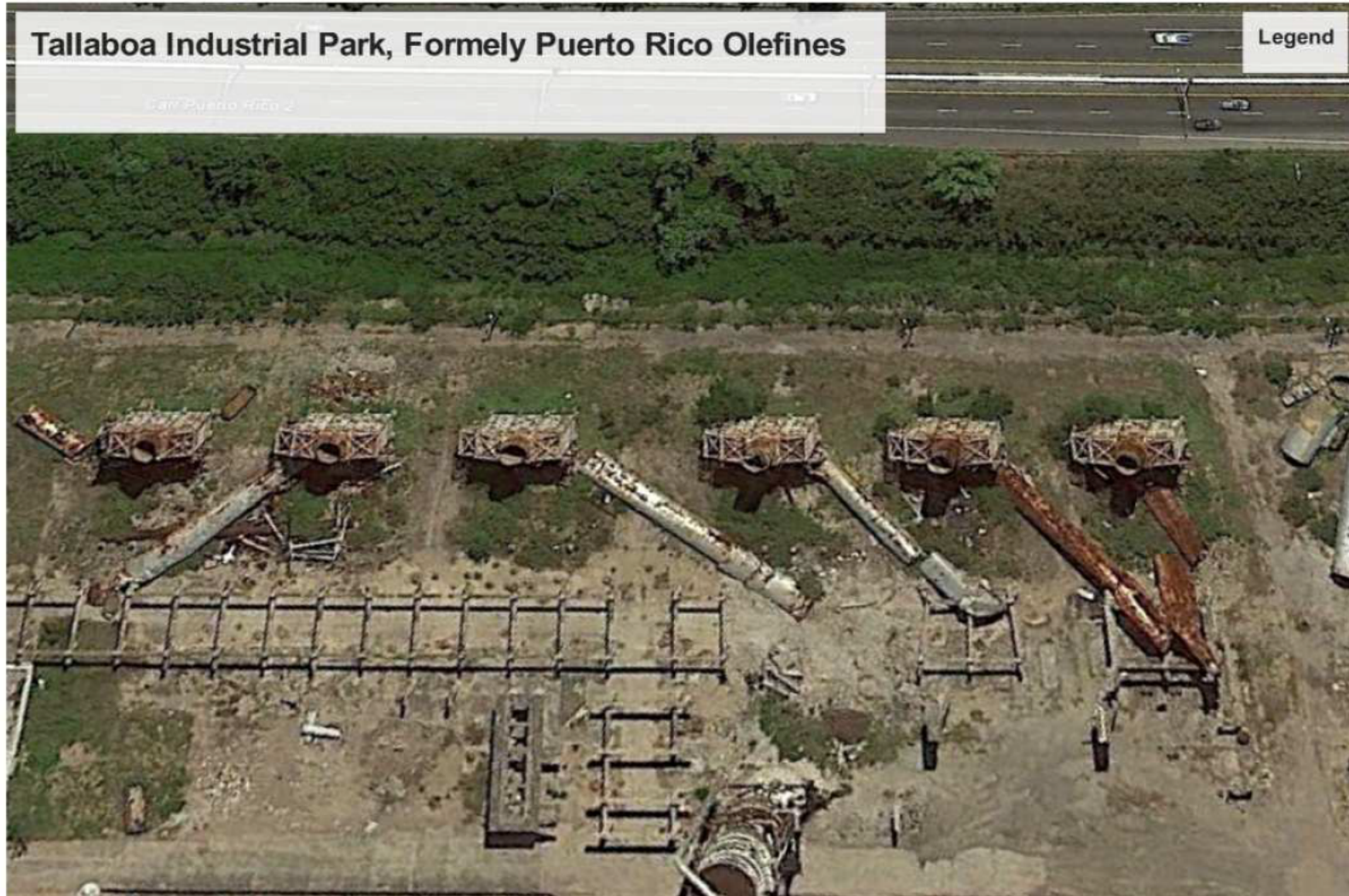
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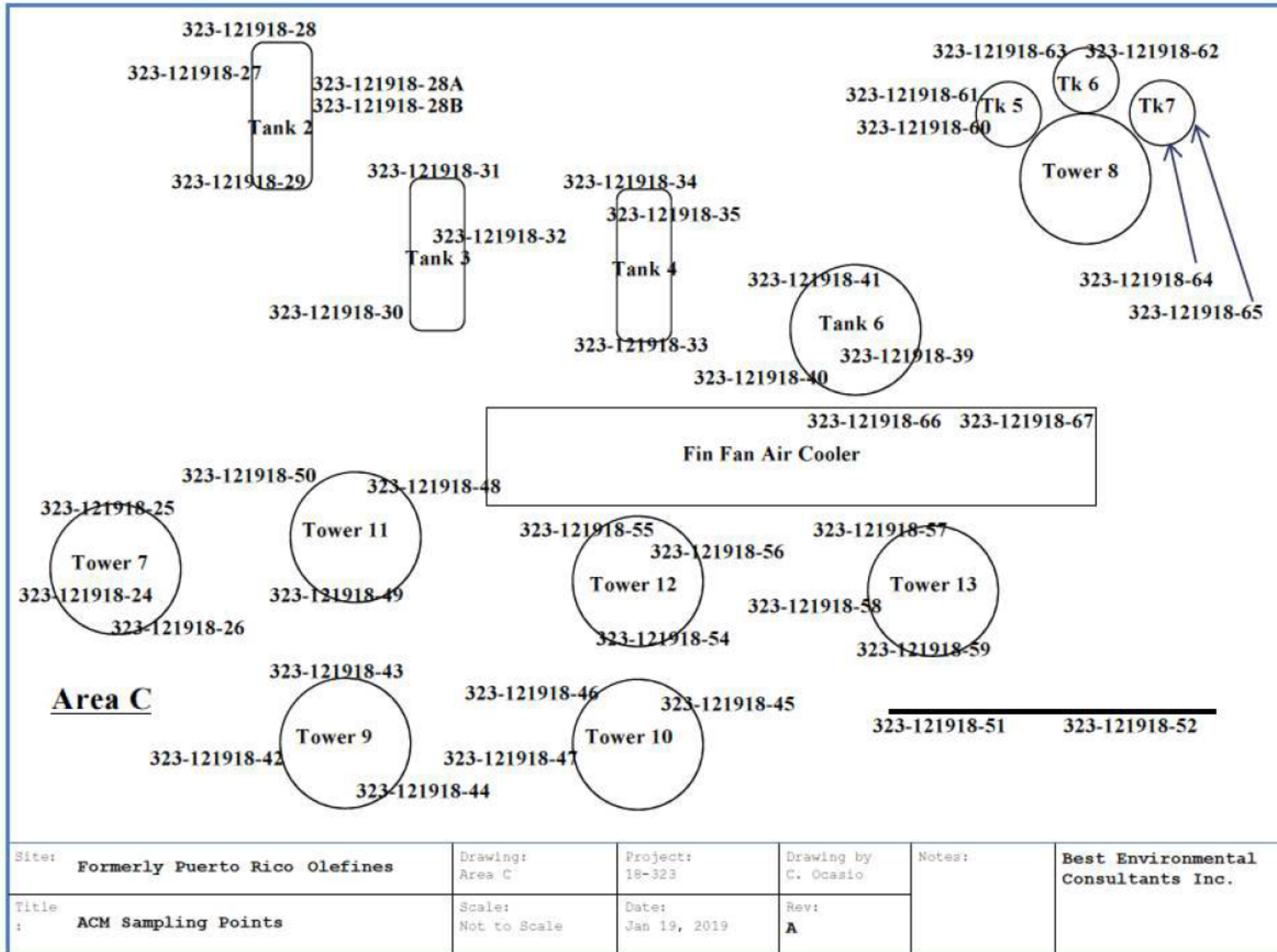
JANUARY 29, 2019



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JANUARY 29, 2019



JANUARY 29, 2019



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144-140