



TABLE 1 ESTIMATED ENVIRONMENTAL CONSULTING & ABATEMENT BUDGET

REMOVAL OF ASBESTOS CONTAINING MATERIALS

Island Craft Shop/South Hero Town Office
329 & 333 U.S. Route 2
South Hero, Vermont

CPAI INITIAL ASBESTOS INSPECTION AND LEAD TCLP TESTING (Invoice 16234 A attached)	- Comprehensive pre-demolition asbestos inspections and lead TCLP testing of the future demolition waste stream for each building. - Follow-up asbestos & lead TCLP Testing at the South Hero Town Office	\$ 4,550.00
PROPOSED COST FOR PROJECT DESIGN & BID ADMINISTRATION RELATED TO PROPER REMOVAL OF ASBESTOS & LEAD HAZARDOUS WASTE	- Preparation of bid package to include specifications, inventory of materials to be removed, drawings and bid form. - Preparation of Invitation to Bid and distribution to selected abatement contractors. - Administration of on-site pre bid walkthrough with a minimum of three (3) VT licensed asbestos abatement contractors.	\$ 775.00
ESTIMATED COST FOR PROPER REMOVAL/ DISPOSAL OF ALL ASBESTOS CONTAINING MATERIALS	- Selected contractor to submit notification documents to VT Dept. of Health and U.S. EPA Region 1. - Proper removal/disposal of all specified materials in accordance with applicable federal & state regulations and CPAI Design Document.	\$ 12,600.00
ESTIMATED COST FOR PROPER REMOVAL/ DISPOSAL OF ALL LEAD HAZARDOUS WASTE	- Proper removal of lead hazardous waste. - Coordination of transport and disposal of all lead hazardous waste.	\$ 15,000.00
ESTIMATED PROJECT MONITORING & MGMT. BUDGET	- Limited & random on-site Project Monitoring during abatement. - Performance of clearance visual inspection and air sample collection/analysis. - Reporting & Administrative	\$ 1,110.00
TOTAL ESTIMATED BUDGET AS OF FEBRUARY 3, 2025:		\$ 34,035.00



February 3, 2025

Town of South Hero
Selectboard
333 U.S. Route 2
South Hero, Vermont 05486

Re: Inspection for Asbestos Containing Materials
South Hero Town Office, 333 U.S. Route 2, South Hero, Vermont
CPAI Project #16234

Dear Selectboard:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on October 11, 2024 and January 3, 2025 on/within the South Hero Town Office at 333 U.S. Route 2, South Hero, Vermont. Inspection activities were performed to evaluate suspect asbestos containing materials prior to planned building demolition activities.

On October 11, 2024 and January 3, 2025, CPAI collected forty-three (43) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service of which forty-two (42) were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods. One (1) sample was not analyzed in accordance with our stop positive protocol. Three (3) additional layers within the bulk samples submitted by CPAI was detected by the analytical service and analyzed by PLM.

Drawings depicting existing conditions/CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), Inventory of Asbestos Containing Materials (Table 2), analytical service bulk sample analysis report, and CPAI/analytical service certification information are attached to this report.

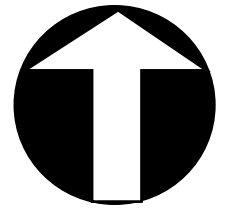
Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

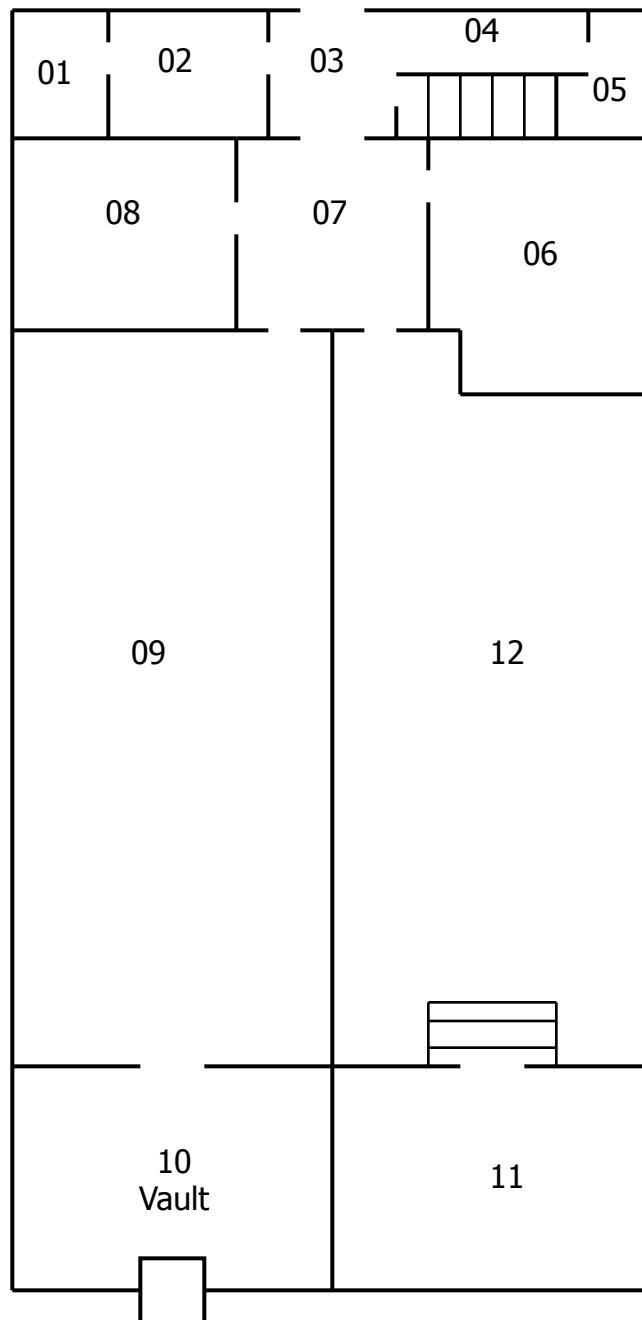
A handwritten signature in black ink, appearing to read 'Kyle B. Austin', with a stylized flourish at the end.

Kyle B. Austin
Environmental Associate

First Floor



Project North



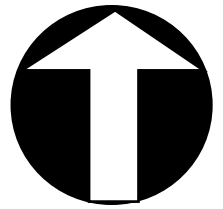
00 = CPAI Area Number

Clay Point Associates, Inc.
Project #16234
October 11, 2024

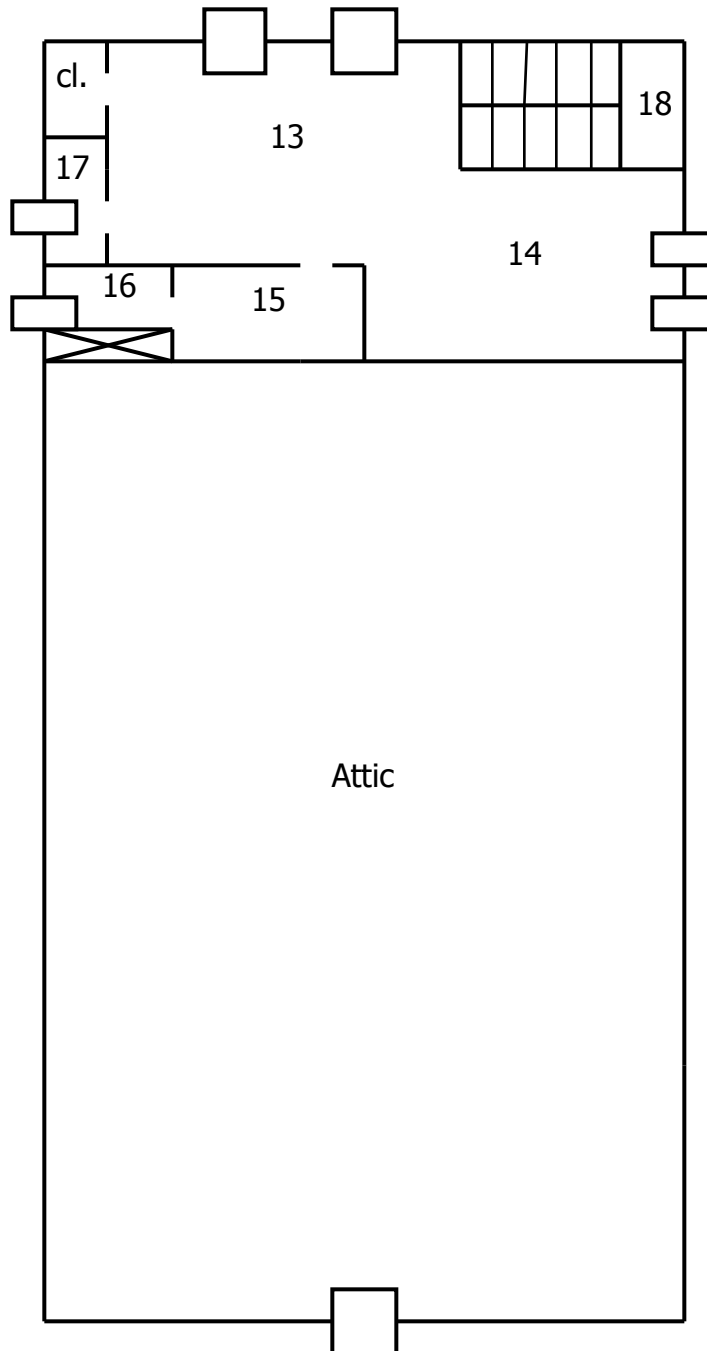
South Hero Town Office
333 US Route 2
South Hero, Vermont

Asbestos Inspection
Not to Scale
Drawn By: Kyle Austin

Second Floor



Project North



00 = CPAI Area Number



Table 1
Bulk Sample Analysis Inventory

Building/Addition:

South Hero Town Office
333 U.S. Route 2
South Hero, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Joint Compound, assoc. w/ Gypsum Wallboard	10112416234-11	10/11/24	2452858-001	CPAI Area #04, on south wall, 1 in. from east wall, 7 ft. 6 in. from floor.	3% Chrys.
	10112416234-03	10/11/24	2452858-002	CPAI Area #02, on east wall, 2 ft. 4 in. from south wall, 6 ft. 6 in. from floor.	3% Chrys.
	10112416234-18	10/11/24	2452858-004	CPAI Area #09, on north wall, 1 in. from west wall, 4 ft. 1 in. from floor.	3% Chrys.
	10112416234-19	10/11/24	2452858-006	CPAI Area #12, on north wall, 3 ft. 7 in. from west wall, 4 ft. 1 in. from floor.	3% Chrys.
	10112416234-02	10/11/24	2452858-003	CPAI Area #06, on north wall, 2 ft. 11 in. from east wall, 3 ft. 2 in. from floor.	NAD
	10112416234-26	10/11/24	2452858-007	CPAI Area #11, on west wall, 1 in. from south wall, 4 ft. 1 in. from floor.	NAD
Gypsum Wallboard	10112416234-10	10/11/24	2452858-008	CPAI Area #02, on south wall, 6 in. from west wall, 5 ft. 6 in. from floor.	NAD
	10112416234-01	10/11/24	2452858-009	CPAI Area #06, on west wall, 6 in. from northernmost wall, 5 ft. 8 in. from floor.	NAD
	10112416234-16	10/11/24	2452858-010	CPAI Area #09, on east wall, 11 ft. 8 in. from north wall, 5 ft. 8 in. from floor.	NAD

(continued)

Table 1
Bulk Sample Analysis Inventory

Building/Addition:				South Hero Town Office 333 U.S. Route 2 South Hero, Vermont	
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
	10112416234-20	10/11/24	2452858-011	CPAI Area #12, on east wall, 8 ft. 4 in. from north wall, 4 ft. 7 in. from floor.	NAD
	10112416234-25	10/11/24	2452858-012	CPAI Area #12, on west wall, 39 ft. 10 in. from northernmost wall, 4 ft. 3 in. from floor.	NAD
Joint Compound & Gypsum Wallboard (composite)	10112416234-31	10/11/24	2452858-031	CPAI Area #17, on west wall, 1 ft. 7 in. from north wall, 2 ft. 9 in. from floor.	< 1% Chrys.
	10112416234-40	10/11/24	2452858-032	CPAI Area #13, in closet, on ceiling, 2 ft. from south wall, 7 in. from east wall.	NAD
	10112416234-41	10/11/24	2452858-033	CPAI Area #13, on north wall, 8 in. from east wall, 4 ft. 2 in. from floor.	< 1% Chrys.
	01032516234-51	01/03/25	2553643-001	CPAI Area #01, on west wall, 1 in. from north wall, 1 ft. 3 in. from floor.	1% Chrys.
	01032516234-52	01/03/25	2553643-002	CPAI Area #02, on north wall, 1 in. from east wall, 1 ft. 1 in. from floor.	< 1% Chrys.
	01032516234-53	01/03/25	2553643-003	CPAI Area #12, on west wall, 12 ft. 10 in. from north wall, 5 ft. 3 in. from floor.	< 1% Chrys.
	01032516234-54	01/03/25	2553643-004	CPAI Area #06, on east wall, 11 ft. 7 in. from south wall, 8 in. from floor.	NAD
	01032516234-55	01/03/25	2553643-005	CPAI Area #02, on south wall, 1 in. from east wall, 2 ft. 1 in. from floor.	NAD
Ceiling Tile, 1' x 1', white, smooth	10112416234-05	10/11/24	2452858-016	CPAI Area #07, 4 ft. 10 in. from south wall, 1 in. from east wall.	NAD

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Bulk Sample Analysis Inventory

Building/Addition:			South Hero Town Office 333 U.S. Route 2 South Hero, Vermont		
Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Ceiling Tile, 1' x 1', white, smooth (cont.)	10112416234-07	10/11/24	2452858-017	CPAI Area #08, 7 ft. 4 in. from south wall, 1 ft. 3 in. from west wall.	NAD
Hardboard	10112416234-27	10/11/24	2452858-021	CPAI Area #15, on south wall, 5 ft. 4 in. from east wall, 4 ft. 6 in. from floor.	35% Chrys.
	10112416234-28	10/11/24	2452858-022	CPAI Area #15, on west wall, 1 ft. 6 in. from south wall, 4 ft. from floor.	n/a
Decorative Wallboard, blue squares w/ black border	10112416234-35	10/11/24	2452858-023	CPAI Area #15, on north wall, 6 ft. 9 in. from east wall, 5 ft. 11 in. from floor.	NAD 2 Layers
	10112416234-30	10/11/24	2452858-024	CPAI Area #15, on east wall, 2 ft. 2 in. from south wall, 6 ft. from floor.	NAD 3 Layers
Composition Wallboard, brown	10112416234-36	10/11/24	2452858-027	CPAI Area #17, on ceiling, 1 ft. 2 in. from north wall, 3 ft. 5 in. from west wall.	NAD
	10112416234-34	10/11/24	2452858-028	CPAI Area #13, on ceiling, 1 ft. 8 in. from north wall, 5 ft. 6 in. from east wall.	NAD
Linoleum Floor Covering, white squares w/ tan diamonds	10112416234-09	10/11/24	2452858-013	CPAI Area #01, 11 in. from south wall, 9 in. from west wall.	NAD
	10112416234-08	10/11/24	2452858-014	CPAI Area #02, 2 ft. 9 in. from south wall, 2 in. from west wall.	NAD
Rosin Paper, assoc. w/ hardwood floors	10112416234-15	10/11/24	2452858-019	CPAI Area #07, 7 in. from north wall, 6 in. from east wall.	< 1% Chrys.
	10112416234-14	10/11/24	2452858-020	CPAI Area #05, 2 ft. 5 in. from south wall, 3 ft. 5 in. from east wall.	< 1% Chrys.

Table 1
Bulk Sample Analysis Inventory

Building/Addition:	South Hero Town Office 333 U.S. Route 2 South Hero, Vermont
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Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Sink Undercoat, white	10112416234-12	10/11/24	2452858-015	CPAI Area #02, 1 ft. 3 in. from south wall, 1 ft. 3 in. from east wall.	NAD
Mortar, assoc. w/ brick	10112416234-04	10/11/24	2452858-018	CPAI Area #06, on east wall, 13 ft. 8 in. from south wall, 5 ft. 4 in. from, floor.	NAD
Mortar, assoc. w/ concrete block	10112416234-32	10/11/24	2452858-034	Exterior, West Elevation, north section.	NAD
	10112416234-43	10/11/24	2452858-035	Exterior, East Elevation, south section.	NAD
Concrete	10112416234-33	10/11/24	2452858-029	Exterior, from foundation, northwest corner of building.	NAD
	10112416234-44	10/11/24	2452858-030	Exterior, from foundation, southeast corner of building.	NAD
Window Glazing	10112416234-39	10/11/24	2452858-025	Exterior, East Elevation, south window, lower sash.	NAD
	10112416234-38	10/11/24	2452858-026	Exterior, West Elevation, north window, lower sash.	NAD

PLM = Polarized Light Microscopy
Chrys. = Chrysotile Asbestos
NAD = No Asbestos Detected
n/a = sample not analyzed (stop at first positive result in group)



Table 2
Inventory of Asbestos Containing Materials

Building/Addition:		South Hero Town Office 333 U.S. Route 2 South Hero, Vermont	
CPAI Area No.	Homogeneous Material	Approx. Quantity	General Location
15 & 16	Hardboard	1,012 sq. ft.	Double layer on walls/ceiling throughout each area.



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16234-Batch 2
Laboratory Batch #: 2452858
Date Samples Received: 10/14/2024
Date Samples Analyzed: 10/20/2024
Date of Final Report: 10/20/2024

SAMPLE IDENTIFICATION:

Thirty Five (35) samples from CPAI Proj.#16234-Batch #2 project were submitted by Client on 10/14/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16234-Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2452858
PROJECT #: 16234-Batch 2
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/20/2024
REPORT DATE: 10/20/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2452858-001 10112416234-11	Bulk Material, White/Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2452858-002 10112416234-03	Bulk Material, White/Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2452858-003 10112416234-02	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-004 10112416234-18	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2452858-005 10112416234-22	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-006 10112416234-19	Bulk Material, Beige	LAYER 1 100%	Chrysotile	3%	Cellulose Fiber Binder/Filler	1% 96%
2452858-007 10112416234-26	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-008 10112416234-10	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
2452858-009 10112416234-01	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
2452858-010 10112416234-16	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%



OPTIMUM

Analytical and Consulting, LLC

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CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16234-Batch #2

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2452858
PROJECT #: 16234-Batch 2
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/20/2024
REPORT DATE: 10/20/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2452858-011 10112416234-20	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
2452858-012 10112416234-25	Bulk Material, Gray/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	10% 90%
2452858-013 10112416234-09	Bulk Material, Beige/Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2452858-014 10112416234-08	Bulk Material, Beige/Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	65% 35%
2452858-015 10112416234-12	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-016 10112416234-05	Bulk Material, White/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	97% 3%
2452858-017 10112416234-07	Bulk Material, White/Brown	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	97% 3%
2452858-018 10112416234-04	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-019 10112416234-15	Bulk Material, Pink/Brown	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	97% >2%
2452858-020 10112416234-14	Bulk Material, Pink/Brown	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	97% >2%



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CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16234-Batch #2

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PROJECT #: 16234-Batch 2
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/20/2024
REPORT DATE: 10/20/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2452858-021 10112416234-27	Bulk Material, Gray	LAYER 1 100%	Chrysotile	35%	Cellulose Fiber Binder/Filler	1% 64%
2452858-022 10112416234-28	Bulk Material, Gray Note: Positive Stop	LAYER 1 100%				
2452858-023 10112416234-35	LAYER 1 Bulk Material, Blue/Brown LAYER 2 Bulk Material, Brown	LAYER 1 100% LAYER 2 100%	None Detected None Detected		Cellulose Fiber Binder/Filler Cellulose Fiber Binder/Filler	98% 2% 2% 98%
2452858-024 10112416234-30	LAYER 1 Bulk Material, Blue/Brown LAYER 2 Bulk Material, Brown LAYER 3 Bulk Material, Black	LAYER 1 100% LAYER 2 100% LAYER 3 100%	None Detected None Detected None Detected		Cellulose Fiber Binder/Filler Cellulose Fiber Binder/Filler Cellulose Fiber Binder/Filler	98% 2% 2% 98% 2% 98%
2452858-025 10112416234-39	Bulk Material, White/Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-026 10112416234-38	Bulk Material, White	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-027 10112416234-36	Bulk Material, Brown/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	98% 2%
2452858-028 10112416234-34	Bulk Material, Brown/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	98% 2%



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CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.#16234-Batch #2

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ORDER #: 2452858
PROJECT #: 16234-Batch 2
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/20/2024
REPORT DATE: 10/20/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2452858-029 10112416234-33	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-030 10112416234-44	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-031 10112416234-31	Bulk Material - Composite Analysis, Gray/Brown/Beige Note: Composite analysis requested by client. See note at end of report.	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	8% >91%
2452858-032 10112416234-40	Bulk Material - Composite Analysis, Gray/Brown/Beige/White Note: Composite analysis requested by client. See note at end of report.	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	8% 92%
2452858-033 10112416234-41	Bulk Material - Composite Analysis, Gray/Brown/Beige Note: Composite analysis requested by client. See note at end of report.	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	8% >91%
2452858-034 10112416234-32	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%
2452858-035 10112416234-43	Bulk Material, Gray	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	1% 99%



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PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2452858
PROJECT #: 16234-Batch 2
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/20/2024
REPORT DATE: 10/20/2024
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
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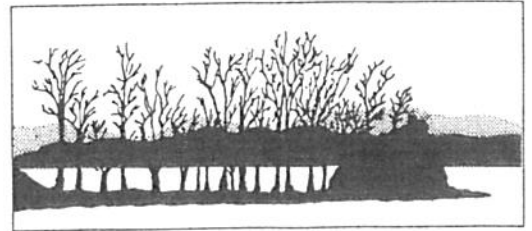
OSHA regards each of the items used to construct wall shells from wallboard panels as separate materials. Each of these materials that may contain asbestos must be analyzed separately for their asbestos content. The lab does not determine if the wall system is $\leq 1\%$. The composite result from the lab only represents the sample submitted by the client and is not a representation of the JC to the wallboard.

**Analyst
Signatory:**

Jamie Noel

NVLAP
TESTING
NVLAP Lab Code: 101433-0

245 2858



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

CPAI Proj. #:

16234 - ~~16234~~ #1 & #2

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
✓			✓		10112416234-01 → 44

	Date	Time	Name	Signature
Transfer #1	10/11/21	9:00pm	Lee	
to:		TO OAC VIA FedEx		20

Transfer #2				
to:				

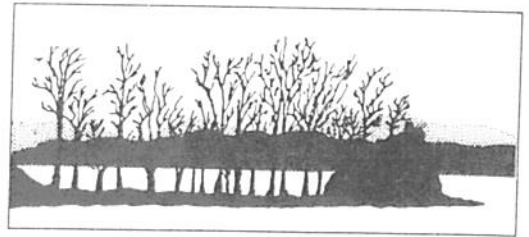
Transfer #3				
to:				

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

Lee 10/14/21 1:42

2452858

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 10/11/24 CPAI Proj. #: 16234 - Batch #2

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
10112416234 - 11	10/11/24	PLM	1	Analyze Each
-03			2	Group until
-02			3	1st positive -
-18			4	4 Day TAT
-22			5	
-19			6	
-26			7	
-10			8	
-01			9	
-16			10	
-20			11	
-25			12	
-09			13	
-08			13	
-12			14	

Chain of Custody Form Attached?

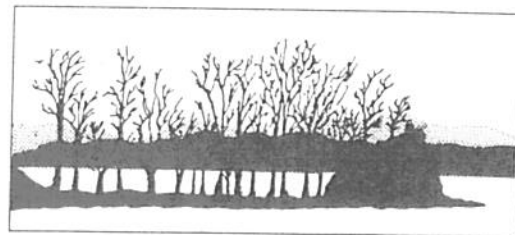
☒ Yes

☐ No

Consultant Signature: [Signature] Page No.: 1 of 3

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600

2452858

Clay Point Associates, Inc.**BULK SAMPLE ANALYSIS REQUEST FORM**Date of Submission: 10/11/24 CPAI Proj. #: 16234 - Bore #1Analytical Service: ONE

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
10112416234-05	10/11/24	ALN	15	SEE PAGE 1
-07			15	
-04			16	
-15			17	
-14			17	
-27			18	
-28			18	
-35			19	
-30			19	
-39			20	
-38			20	
-36			21	
-37			21	
-33			22	
44-35			22	

Chain of Custody Form Attached?

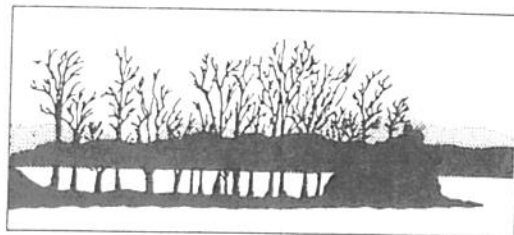
Yes

No

Consultant Signature: [Signature] Page No.: 2 of 3

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2452858



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 10/11/24 CPAI Proj. #: 16234 - BATCH #2

Analytical Service: GAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
10112416234-31	10/11/24	PLN	23	SEE PAGE 1
-40			24	
-41			25	
-32			26	
-13			26	

Analyze
AS
COMPOSITE

Chain of Custody Form Attached?

Yes

No

Consultant Signature: [Signature]

Page No.: 3 of 3

P.O. BOX 1254 • WILLISTON, VERMONT • 05495-1254 • 802-879-2600



Outlook

245 2858

CPAI Project 16234-Batch 2

From Kyle Austin <austin@claypointassociates.com>

Date Tue 10/15/2024 1:17 PM

To Eileen Hutchinson <eileen.hutchinson@optimumanalytical.com>

Hi Eileen,

The 2nd #34 (grouped with #33) on the coc should be #44. Thanks.

--

Kyle B. Austin
Environmental Associate
Clay Point Associates, Inc.
P.O. Box 1254/25 Bishop Avenue
Williston, VT 05495
(802) 879-2600 (office)
(802) 355-2570 (mobile)

Visit our website!

www.claypointassociates.com

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Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16234
Laboratory Batch #: 2553643; Issue #2
Date Samples Received: 01/06/2025
Date Samples Analyzed: 01/10/2025
Date of Final Report: 01/29/2025

SAMPLE IDENTIFICATION:

Five (5) samples from CPAI Proj. #16234 project were submitted by Client on 01/06/2025

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1%, 400 Point Count = .25%, 1000 Point Count = 0.1%; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj. #16234

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2553643; Issue #2
PROJECT #: 16234
DATE COLLECTED: 01/03/2025
COLLECTED BY: Client
DATE RECEIVED: 01/06/2025
ANALYSIS DATE: 01/10/2025
REPORT DATE: 01/29/2025
ANALYST: Jamie Noel

REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type	(%)	Non-Asbestos Components	(%)
2553643-001 01032516234-51	Bulk Material Composite, White/Brown/Beige	LAYER 1 100%	Chrysotile	1%	Cellulose Fiber Binder/Filler	8% 91%
2553643-002 01032516234-52	Bulk Material Composite, White/Brown/Beige	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	8% >91%
2553643-003 01032516234-53	Bulk Material Composite, White/Brown/Beige	LAYER 1 100%	Chrysotile	<1%	Cellulose Fiber Binder/Filler	8% >91%
2553643-004 01032516234-54	Bulk Material Composite, White/Brown/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	8% 92%
2553643-005 01032516234-55	Bulk Material Composite, White/Brown/Beige	LAYER 1 100%	None Detected		Cellulose Fiber Binder/Filler	8% 92%

The report has been amended per client request. This report (issue #2) replaces the original report released on 1/10/2025.

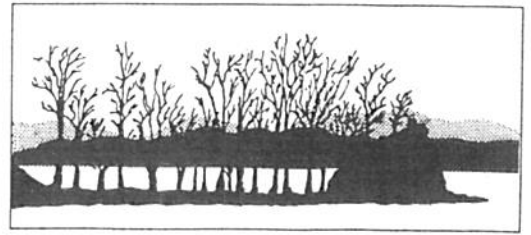
**Analyst
Signatory:**
Jamie Noel

NVLAP
TESTING
NVLAP Lab Code: 101433-0

2553643

2553643; Issue #2

Clay Point Associates, Inc.



CHAIN OF CUSTODY FORM

CPAI Proj. #:

16234

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
x			x		010325 16234. 51-55

Transfer
#1

Date	Time	Name	Signature
1/3/25	4:00pm	Christer Herring	Christer Herring
to:		Optinum via Fedex	

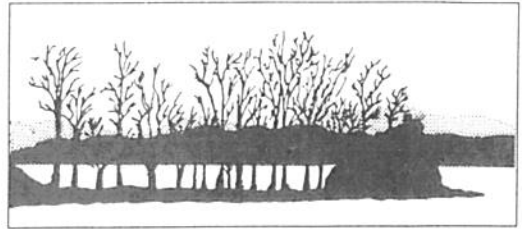
Recieved
~~Transfer~~
#2

11/6/25	10:40	Ava Griffin	
to:			

Transfer
#3

to:			

2553643



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 1/3/25 CPAI Proj. #: 16234

Analytical Service: Optimum

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
010325/6234-51	1/3/25	PLM	1	3 day TAT
↓ -52	↓	↓	2	↓
-53	↓	↓	3	↓
-54	↓	↓	4	↓
↓ -55	↓	↓	5	↓

Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: Christi Horner Page No.: 1 of 1

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Consulting Company

Clay Point Associates Inc

PO BOX 1254, 25 BISHOP AVE STE B-2

Williston, Vermont 05495

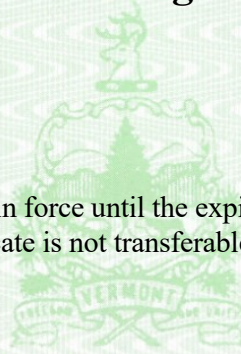
LICENSE: Asb-Co-Con-000031

EXPIRES: 5/2/2025

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Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



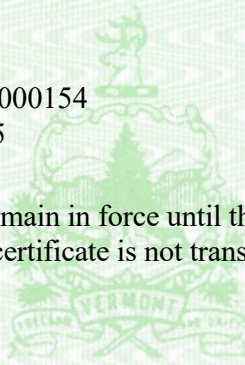
Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Inspector

Kyle Austin

LICENSE: Asb-I/MP-000154

EXPIRES: 10/19/2025



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Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Analytical Company

OPTIMUM ANALYTICAL AND CONSULTING LLC

85 STILES ROAD, STE 201
Salem, New Hampshire 03079

LICENSE: Asb-Co-An-000029

EXPIRES: 6/14/2025

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Asbestos Analytical Company - PLM

Asbestos Analytical Company - PCM

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



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Certificate of License - Vermont Asbestos and Lead Regulatory Program

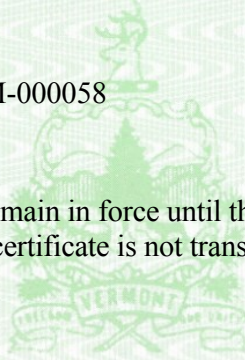
ASBESTOS ANALYST - PLM

Jaime L Noel

LICENSE: Asb-I-PLM-000058

EXPIRES: 2/28/2025

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Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



October 24, 2024

Town of South Hero
Selectboard
333 U.S. Route 2
South Hero, Vermont 05486

Re: Inspection for Asbestos Containing Materials
Island Craft Shop, 329 U.S. Route 2, South Hero, Vermont
CPAI Project #16234

Dear Selectboard:

Enclosed is documentation related to professional asbestos inspection activities performed by Clay Point Associates, Inc. (CPAI) on October 11, 2024 on/within the Island Craft Shop at 329 U.S. Route 2, South Hero, Vermont. Inspection activities were performed to evaluate suspect asbestos containing materials prior to planned building demolition activities.

On October 11, 2024, CPAI collected eight (8) bulk samples from suspect asbestos containing materials. All bulk samples were submitted to a Vermont certified analytical service and were analyzed by Polarized Light Microscopy (PLM), Visual Estimation Method, according to EPA Method 600/R-93/116. Identification of asbestos by PLM is based on optical crystallographic properties, and gives a qualitative differentiation between types of asbestos and other fibrous materials. It also allows for a quantitative estimate of percent asbestos using EPA approved methods.

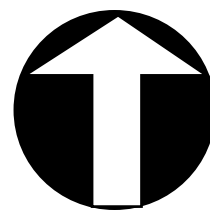
A drawing depicting existing conditions/CPAI Area Numbers, The Bulk Sample Analysis Inventory (Table 1), analytical service bulk sample analysis report and CPAI/analytical service certification information are attached to this report.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this report, or require additional information, please contact us at (802) 879-2600, or by email at info@claypointassociates.com.

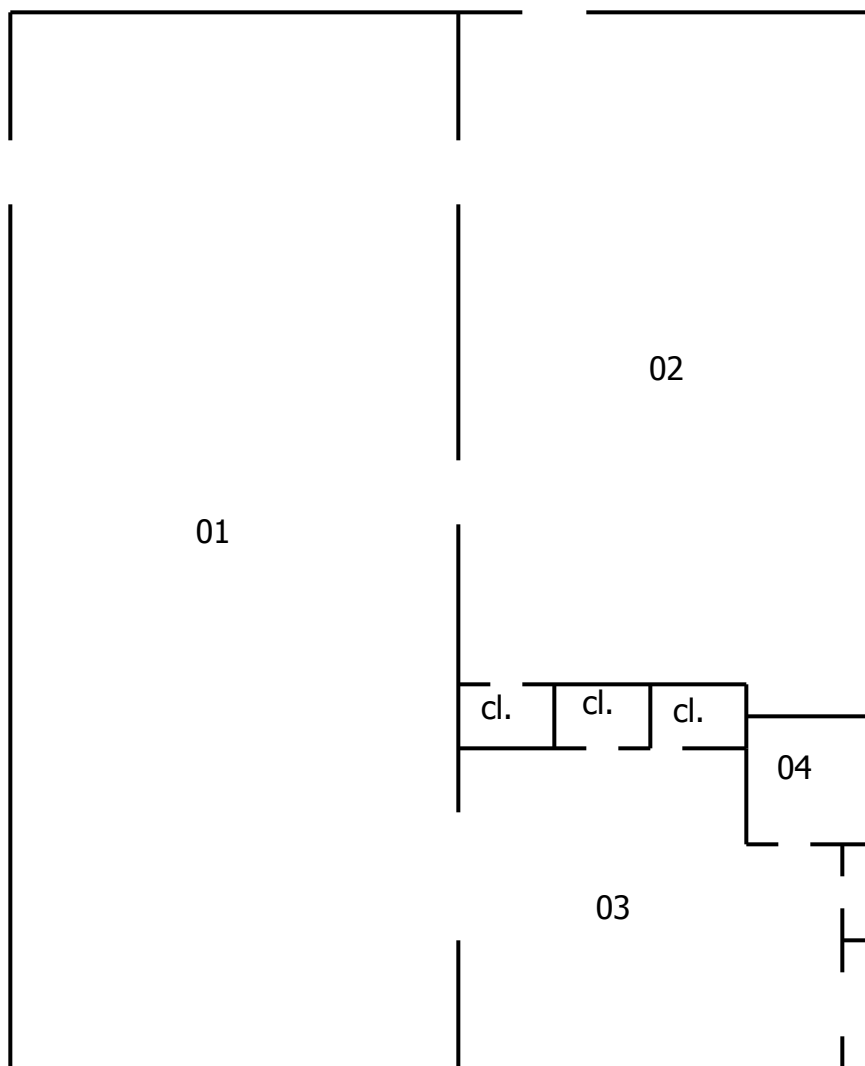
Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read 'Kyle B. Austin', with a stylized flourish at the end.

Kyle B. Austin
Environmental Associate



Project North



00 = CPAI Area Number

Clay Point Associates, Inc.
Project #16234
October 11, 2024

Island Craft Shop
329 US Route 2
South Hero, Vermont

Asbestos Inspection
Not to Scale
Drawn By: Kyle Austin



Table 1
Bulk Sample Analysis Inventory

Building/Addition: Island Craft Shop
329 U.S. Route 2
South Hero, Vermont

Homogeneous Area	Sample No.	Date Collected	Lab I.D. No.	Sample Location	PLM Result
Ceiling Tile, 1' x 1', white w/ fissures & pinholes	10112416234-21	10/11/24	2452840-001	CPAI Area #02, 4 ft. 10 in. from north wall, 4 ft. from east wall.	NAD
	10112416234-42	10/11/24	2452840-002	CPAI Area #02, 1 in. from south wall, 3 ft. 4 in. from east wall.	NAD
Ceiling Tile, 1' x 1', white, smooth	10112416234-29	10/11/24	2452840-003	CPAI Area #04, 1 in. from south wall, 9 in. from east wall.	NAD
	10112416234-23	10/11/24	2452840-004	CPAI Area #04, 1 in. from north wall, 1 ft. 9 in. from west wall.	NAD
Gypsum Wallboard	10112416234-17	10/11/24	2452840-005	CPAI Area #03, southeast closet, on ceiling, 1 ft. 6 in. from south wall, 8 in. from east wall.	NAD
	10112416234-13	10/11/24	2452840-006	CPAI Area #03, on ceiling, 5 ft. 6 in. from south wall, 2 ft. 4 in. from easternmost wall.	NAD
Concrete	10112416234-37	10/11/24	2452840-007	CPAI Area #03, from slab, 6 ft. 2 in. from south wall, 8 in. from easternmost wall.	NAD
	10112416234-06	10/11/24	2452840-008	Exterior, from slab, southeast corner of building.	NAD

PLM = Polarized Light Microscopy
NAD = No Asbestos Detected



Todd Hobson
Clay Point Associates, Inc.
P.O. Box 1254
Williston, VT 05495

Project Reference: 16234 Batch #1
Laboratory Batch #: 2452840
Date Samples Received: 10/14/2024
Date Samples Analyzed: 10/24/2024
Date of Final Report: 10/24/2024

SAMPLE IDENTIFICATION:

Eight (8) samples from CPAI Proj.# 16234-Batch#1 project were submitted by Client on 10/14/2024

This bulk sample(s) was delivered to Optimum Analytical Consulting, LLC (Optimum) located in Salem, New Hampshire for asbestos content determination.

ANALYTICAL METHOD:

Analytical procedures were performed in accordance with the U.S. Environmental Protection Agency (EPA) Recommended Method for the Determination of Asbestos in Bulk Samples by Polarized Light Microscopy and Dispersion Staining (PLM/DS)(EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials). This report relates only to those samples analyzed, and may not be indicative of other similar appearing materials existing at this, or other sites. Quantification of asbestos content was determined by Calibrated Visual Estimation. Optimum is not responsible for sample collection activities or analytical method limitations. The laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

In any given material, fibers with a small diameter ($<0.25\mu\text{m}$) may not be detected by the PLM method. Floor tile and other resinous bound materials may yield a false negative if the asbestos fibers are too small to be resolved using PLM. Additionally, there is currently no approved EPA analytical method to reliably confirm vermiculite as non-asbestos containing. Additional analytical methods may be required. Optimum Analytical recommends using Transmission Electron Microscopy (TEM) or other approved methods for a more definitive analysis.

Optimum will retain all samples for a minimum of three months. Further analysis or return of samples must be requested within this three month period to guarantee their availability. This report may not be reproduced except in full, without the written approval of Optimum Analytical and Consulting, LLC.

The client/laboratory shall not use the NVLAP and AIHA Logo or this test report in a way that constitutes or implies product certification, approval, or endorsement by the National Institute of Standards and Technology or the American Industrial Hygiene Association.

Detection Limit $<1\%$, Reporting Limits: CVES = 1% , 400 Point Count = $.25\%$, 1000 Point Count = 0.1% ; Present or Absent are observations made during a qualitative analysis.

This report is considered preliminary until signed by both the Laboratory Analyst and Laboratory Director or Supervisor. If you have any questions regarding this report, please do not hesitate to contact us.

Jamie L. Noel
Laboratory Director



OPTIMUM

Analytical and Consulting, LLC

85 Stiles Road, Suite 201, Salem, NH 03079 Phone: (603)-458-5247

CLIENT: Clay Point Associates, Inc.
ADDRESS: P.O. Box 1254
CITY / STATE / ZIP: Williston, VT 05495
CONTACT: Todd Hobson
DESCRIPTION: PLM Analysis
LOCATION: CPAI Proj.# 16234-Batch#1

BULK SAMPLE ANALYSIS REPORT POLARIZED LIGHT MICROSCOPY

PLM (EPA-40 CFR Appendix E to Subpart E of Part 763, Interim Method of the Determination of Asbestos in Bulk Insulation Samples, EPA-600/ R-93-116 Method for Determination of Asbestos in Bulk Building Materials) NVLAP Lab Code: 101433-0

ORDER #: 2452840
PROJECT #: 16234 Batch #1
DATE COLLECTED: 10/11/2024
COLLECTED BY: Client
DATE RECEIVED: 10/14/2024
ANALYSIS DATE: 10/24/2024
REPORT DATE: 10/24/2024
ANALYST: Jamie Noel

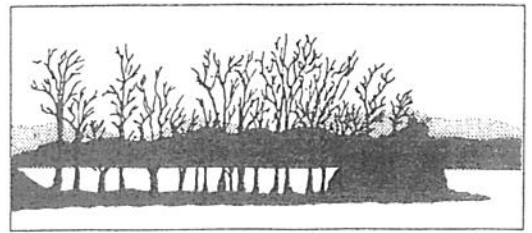
REPORT OF ANALYSIS

Laboratory ID Sample No.	Sample Location Description	Layer No. Layer %	Asbestos Type (%)	Non-Asbestos Components (%)
2452840-001 10112416234-21	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2452840-002 10112416234-42	Bulk Material, Gray/White	LAYER 1 100%	None Detected	Cellulose Fiber 65% Fibrous Glass 15% Binder/Filler 20%
2452840-003 10112416234-29	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 97% Binder/Filler 3%
2452840-004 10112416234-23	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 97% Binder/Filler 3%
2452840-005 10112416234-17	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2452840-006 10112416234-13	Bulk Material, White/Brown	LAYER 1 100%	None Detected	Cellulose Fiber 10% Binder/Filler 90%
2452840-007 10112416234-37	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%
2452840-008 10112416234-06	Bulk Material, Gray	LAYER 1 100%	None Detected	Cellulose Fiber 1% Binder/Filler 99%

**Analyst
Signatory:**
Jamie Noel

NVLAP
TESTING
NVLAP Lab Code: 101433-0

2452840



Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

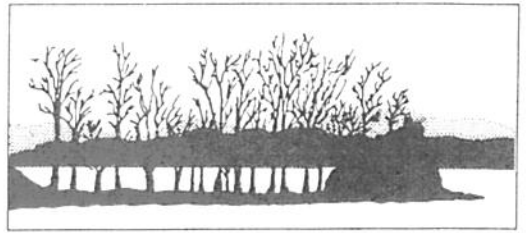
CPAI Proj. #:

10237 - 10/14/24 - 10/14/24

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
					1042416251-01 - 10/14/24

	Date	Time	Name	Signature
Transfer #1	10/14/24	4:50 PM	1042	10/14/24
to:		TO OAC VIA POST		2P
Transfer #2				
to:				
Transfer #3				
to:				

2452840



Clay Point Associates, Inc.

BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 10/11/24 CPAI Proj. #: 16234 - Batch #1

Analytical Service: OAC

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
1017416234 - 21	10/11/24	PLM	1	Analyze Each
-12			1	(Group Data)
-29			2	1st positive
-23			2	Result -
-17			3	4 - Day TAT
-13			3	
-37			4	
-06			4	

Chain of Custody Form Attached?

Yes

No

Consultant Signature: [Signature] Page No.: 1 of 1

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Consulting Company

Clay Point Associates Inc

PO BOX 1254, 25 BISHOP AVE STE B-2

Williston, Vermont 05495

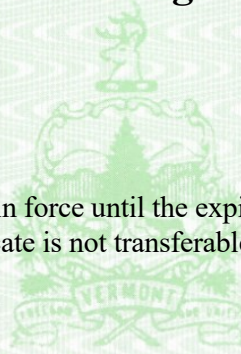
LICENSE: Asb-Co-Con-000031

EXPIRES: 5/2/2025

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Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



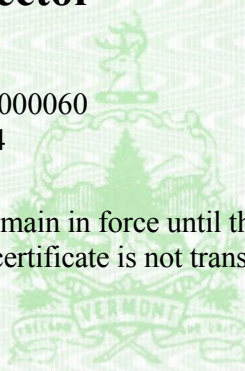
Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Inspector

KYLE AUSTIN

LICENSE: Asb-I/MP-000060

EXPIRES: 10/19/2024



This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.



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License Information

Vermont Department of Health
Environmental Health
108 Cherry Street, Suite 201
Burlington, VT 05402
ALRP@vermont.gov

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Asbestos Analytical Company

OPTIMUM ANALYTICAL AND CONSULTING LLC

85 STILES ROAD, STE 201
Salem, New Hampshire 03079

LICENSE: Asb-Co-An-000029

EXPIRES: 6/14/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.

Asbestos Analytical Company - PLM

Asbestos Analytical Company - PCM

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



Scan the QR Code for
License Information



Certificate of License - Vermont Asbestos and Lead Regulatory Program

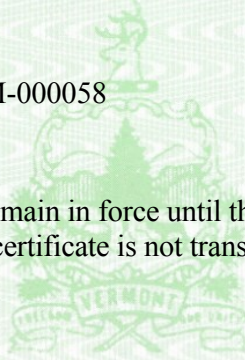
ASBESTOS ANALYST - PLM

Jaime L Noel

LICENSE: Asb-I-PLM-000058

EXPIRES: 2/28/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.



Scan the QR Code for
License Information

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



October 22, 2024

Town of South Hero
Selectboard
333 US Route 2
South Hero, Vermont 05486

Re: Report of TCLP Sample Collection/Analysis (Lead)
Island Craft Shop, 329 US Route 2, South Hero, Vermont
CPAI Project #16234

Dear Folks:

The following describes Lead (Pb) Toxicity Characteristic Leaching Procedure (TCLP) sample collection/analysis activities performed by Clay Point Associates, Inc. (CPAI) on your behalf.

On October 11, 2024, CPAI collected one (1) composited sample of representative building materials comprising the future waste stream to be generated during planned demolition of the buildings/building debris at the Island Craft Shop, 329 US Route 2, South Hero, Vermont.

The sample contained thirty (30) aliquots (subsamples) collected from building materials in proportion to their contribution to the overall waste stream. The aliquots were composited into one (1) sample that was submitted to a Vermont certified Lead Analytical Service for analysis by the Toxicity Characteristic Leaching Procedure (EPA 7000B/1311).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (mg/L) (ppm). Materials that are subject to a lead TCLP test and exceed this limit must be considered lead hazardous waste.

The lead concentration of sample 16234-TCLP1 was reported to be 0.267 milligrams/liter. This concentration is well below the limit of 5.0 milligrams/liter. Therefore, all debris generated during demolition of the Island Craft Shop can be considered non-hazardous, construction and demolition debris relative to lead content.

The TCLP Sample Collection/Analysis Data (Tables 1), the analytical service analysis report, and CPAI/analytical service certification documents are attached for your review.

South Hero Selectboard
October 22, 2024
Page 2

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this correspondence or require additional services, please contact us at (802) 343-4809 or by email at hobson@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Kyle B. Austin". The signature is fluid and cursive, with a large loop for the letter 'A'.

Kyle B. Austin
Environmental Associate



Table 1
TCLP (LEAD) Sample Collection/Analysis Data

CPAI Project #	16234
Client:	Town of South Hero
Location:	Island Craft Shop 329 US Route 2 South Hero, Vermont

CPAI Sample #	Laboratory I.D.#	Date Sampled	Location	Concentration (Lead)
16234-TCLP1	587847-001	10/11/24	Island Craft Shop, 329 US Route 2, South Hero, Vermont.	0.267 mg/L

Thirty (30) aliquots including: ceiling tile, interior wood trim (stained), paneling (factory finish), gypsum wallboard (painted), interior wood trim (painted), door (painted), concrete (painted), plywood (painted), plywood (unpainted), wood framing, fiberglass, carpet & pad, composition board siding, exterior wood trim (painted), concrete (unpainted), metal roof (painted).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (ppm). Materials which are subject to a TCLP test and exceed this limit must be considered lead hazardous waste



Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer: Clay Point Associates, Inc. (1846)
Address: PO Box 1254
Williston, VT 05495

Order #: 587847

Matrix TCLP
Received 10/14/24
Reported 10/16/24

Attn:

Project:

Location:

Number: 16234

PO Number:

Sample ID	Cust. Sample ID	Location	Result	RL*	Units	Analysis Date	Analyst
Parameter		Method					
587847-001	16234-TCLP 1						
Metals Analysis							
Lead		EPA 7000B / 1311	0.267	0.200	mg/L	10/15/24	AI

587847-10/16/24 01:24 PM

Kelly Muncy

Reviewed By: **Kelly Muncy**
Manager

EPA TCLP Regulatory Limits

Parameter	Reg. Limit	Unit
Lead	5.00	mg/L

State Certifications

Method	Parameter	Vermont	Virginia
EPA 7000B	Lead	No state cert. necessary	VELAP Certified
State	Certificate Number		
Vermont	LL Lead-Co-An-000002		
Virginia	VELAP 12761		

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. Solid PPM = mg/kg | PPB = µg/kg and Water PPM = mg/L | PPB = µg/L. The test results apply to the sample as received.



587847

V:\587\587847

lkyger

10/14/2024 9:50:00 AM

Federal Express

818295397099

Clay Point Associates, Inc.

CHAIN OF CUSTODY FORM

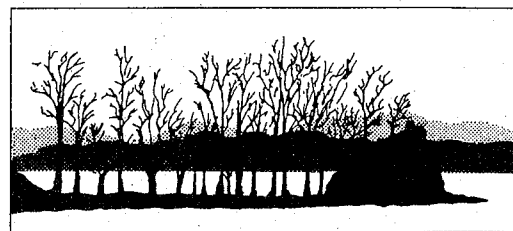
CPAI Proj. #:

16234

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
	Pb		TCLP		16234-TCLP 1 & 16234-TCLP 2

	Date	Time	Name	Signature
Transfer #1	10/11/24	4:00 pm	KSA	[Signature]
to:	TO SLG VIA FedEx			
Transfer #2				
to:				
Transfer #3				
to:				

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 10/11/24 CPAI Proj. #: 16234

Analytical Service: SLG

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
16234 - TCLP1	10/11/24	Phase A4	1	LEAD TCLP
16234 - TCLP2	"	"	2	Samples -
				STD TAT

Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: _____

Page No.: 1 of 1

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Lead Consulting Company

Clay Point Associates Inc

PO BOX 1254, 25 BISHOP AVE STE B-2
Williston, VT 05495

LICENSE: Lead-Co-Con-000002

EXPIRES: 5/21/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time.
This certificate is not transferable and is valid only for the above party. A licensed lead-based paint abatement supervisor must remain present on-site during all active phases of any permitted lead abatement project.

A copy of this certificate must be on the work site at all times.



Scan the QR Code for
License Information

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Lead Analytical Company

Schneider Laboratories Global Inc
2512 W Cary Street
Richmond, Virginia 23220

LICENSE: Lead-Co-An-000002
EXPIRES: 6/29/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.

Lead Analytical Company - Soil
Lead Analytical Company - Dust
Lead Analytical Company - Paint Chip

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



Scan the QR Code for License Information



October 22, 2024

Town of South Hero
Selectboard
333 US Route 2
South Hero, Vermont 05486

Re: Report of TCLP Sample Collection/Analysis (Lead)
South Hero Town Office, 329 US Route 2, South Hero, Vermont
CPAI Project #16234

Dear Folks:

The following describes Lead (Pb) Toxicity Characteristic Leaching Procedure (TCLP) sample collection/analysis activities performed by Clay Point Associates, Inc. (CPAI) on your behalf.

On October 11, 2024, CPAI collected one (1) composited sample of representative building materials comprising the future waste stream to be generated during planned demolition of the South Hero Town Offices, 333 US Route 2, South Hero, Vermont.

The sample contained thirty (30) aliquots (subsamples) collected from building materials in proportion to their contribution to the overall waste stream. The aliquots were composited into one (1) sample per building that was submitted to a Vermont certified Lead Analytical Service for analysis by the Toxicity Characteristic Leaching Procedure (EPA 7000B/1311).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (mg/L) (ppm). Materials that are subject to a lead TCLP test and exceed this limit must be considered lead hazardous waste.

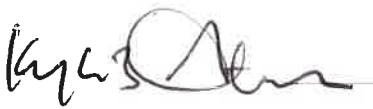
The lead concentration of sample 16234-TCLP2 was reported to be 9.09 milligrams/liter. This concentration is above the limit of 5.0 milligrams/liter. Therefore, all debris generated during demolition (removal) of the South Hero Town Office is considered lead hazardous waste pending further characterization.

The TCLP Sample Collection/Analysis Data (Tables 1), the analytical service analysis report, and CPAI/analytical service certification documents are attached for your review.

Town of South Hero
October 22, 2024
Page 2

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this correspondence or require additional services, please contact us at (802) 343-4809 or by email at hobson@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in black ink, appearing to read "Kyle B. Austin", with a stylized flourish at the end.

Kyle B. Austin
Environmental Associate



Table 1
TCLP (LEAD) Sample Collection/Analysis Data

CPAI Project #	16234
Client:	Town of South Hero
Location:	Town Office 333 US Route 2 South Hero, Vermont

CPAI Sample #	Laboratory I.D.#	Date Sampled	Location	Concentration (Lead)
16234-TCLP2	587847-002	10/11/24	South Hero Town Office, 333 US Route 2, South Hero, Vermont.	9.09 mg/L

Thirty (30) aliquots including: gypsum wallboard (painted), linoleum floor covering, plywood (unpainted), ceiling tile, hardwood doors (stained), carpet, paneling (stained), interior wood trim (painted & stained), fiberglass insulation, blown-in insulation, hardboard (unpainted), wood framing (unpainted), wood windows (painted), metal roofing, concrete, exterior wood trim (painted).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (ppm). Materials which are subject to a TCLP test and exceed this limit must be considered lead hazardous waste



Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer: Clay Point Associates, Inc. (1846)
Address: PO Box 1254
Williston, VT 05495

Order #: 587847

Matrix TCLP
Received 10/14/24
Reported 10/16/24

Attn:

Project:

Location:

Number: 16234

PO Number:

Sample ID	Cust. Sample ID	Location	Result	RL*	Units	Analysis Date	Analyst
Parameter		Method					

587847-002 16234-TCLP 2

Metals Analysis

Lead	EPA 7000B / 1311	9.09	0.200	mg/L	10/15/24	AI
------	------------------	------	-------	------	----------	----

587847-10/16/24 01:24 PM

Kelly Muncy

Reviewed By: **Kelly Muncy**
Manager

EPA TCLP Regulatory Limits

Parameter	Reg. Limit	Unit
Lead	5.00	mg/L

State Certifications

Method	Parameter	Vermont	Virginia
EPA 7000B	Lead	No state cert. necessary	VELAP Certified

State	Certificate Number
Vermont	LL Lead-Co-An-000002
Virginia	VELAP 12761

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. Solid PPM = mg/kg | PPB = µg/kg and Water PPM = mg/L | PPB = µg/L. The test results apply to the sample as received.

Clay Point Associates, Inc.



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Federal Express

10/14/2024 9:50:00 AM

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CHAIN OF CUSTODY FORM

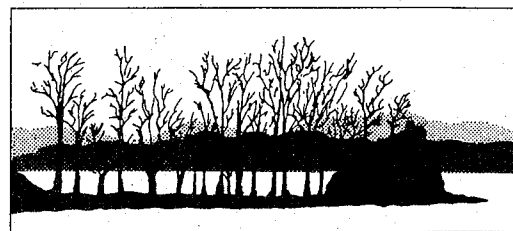
CPAI Proj. #:

16234

Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
	Pb		TCLP		16234-TCLP 1 & 16234-TCLP 2

	Date	Time	Name	Signature
Transfer #1	10/11/24	4:00 pm	KSA	[Signature]
to:	TO SLG VIA FedEx			
Transfer #2				
to:				
Transfer #3				
to:				

Clay Point Associates, Inc.



BULK SAMPLE ANALYSIS REQUEST FORM

Date of Submission: 10/11/24 CPAI Proj. #: 16234

Analytical Service: SLG

Bulk Sample Number	Date of Collection	Type of Analysis	Group No.	Instructions
16234 - TCLP1	10/11/24	Phase A4	1	LEAD TCLP
16234 - TCLP2	"	"	2	Samples -
				STD TAT

Chain of Custody Form Attached?

☒ Yes

☐ No

Consultant Signature: _____

Page No.: 1 of 1

Clay Point Associates, Inc.

www.claypointassociates.com



January 14, 2025

Town of South Hero
Selectboard
333 US Route 2
South Hero, Vermont 05486

Re: Report of TCLP Sample Collection & Analysis (Lead)/Activity #2
South Hero Town Office, 333 US Route 2, South Hero, Vermont
CPAI Project #16234

Dear Folks:

On October 11, 2024, Clay Point Associates, Inc. (CPAI) performed Lead (Pb) Toxicity Characteristic Leaching Procedure (TCLP) sample collection/analysis activities on/within the South Hero Town Office building, 333 US Route 2, South Hero, Vermont. The purpose of this testing activity was to characterize the building demolition waste stream for lead (Pb). The analysis result from this initial activity determined that the entire demolition waste stream would need to be considered lead hazardous waste. Our report of this initial activity has been previously distributed.

On January 3, 2025, CPAI returned to the site to conduct an informal lead-based paint inspection by X-Ray Fluorescence Analyzer (XRF). This informal inspection activity determined that the following substrates were coated with lead-based paint.

All Exterior Wood Trim (doors and windows)
All Wood Clapboards
Painted 2nd Floor Wood Windows

Once the informal inspection activity was completed, CPAI collected one (1) composited sample of representative building materials that were not coated with lead-based paint.

The sample contained thirty (30) aliquots (subsamples) collected from building materials in proportion to their contribution to the overall demolition waste stream. The aliquots were composited into one (1) sample that was submitted to a Vermont certified Lead Analytical Service for analysis by the Toxicity Characteristic Leaching Procedure (EPA 7000B/1311).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (mg/L) (ppm). Materials that are subject to a lead TCLP test and exceed this limit must be considered lead hazardous waste.

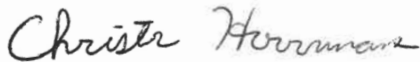
The lead concentration of the sample collected during the second TCLP activity was reported to be 0.601 milligrams/liter. This concentration is below the limit of 5.0 milligrams/liter. Therefore, all debris (excluding exterior trim (door and window), clapboards, and painted 2nd floor wooden windows) generated during demolition of the South Hero Town Office can be considered non-hazardous, construction and demolition debris relative to lead content.

Building materials coated with lead-based paint that are listed above are considered lead hazardous and must be disposed accordingly.

The TCLP Sample Collection/Analysis Data (Tables 1), the analytical service analysis report, and CPAI/analytical service certification documents are attached for your review.

Thank you for the opportunity to service your professional environmental management needs. If you have any questions concerning this correspondence or require additional services, please contact us at (802) 343-4809 or by email at hobson@claypointassociates.com.

Sincerely,
CLAY POINT ASSOCIATES, INC.

A handwritten signature in cursive script that reads "Christer Herrmans". The ink is dark and the signature is written on a light-colored background.

Christer Herrmans
Environmental Specialist



Table 1
TCLP (LEAD) Sample Collection/Analysis Data
(01/03/25)

CPAI Project #	16234
Client:	Town of South Hero
Location:	Town Office 333 US Route 2 South Hero, Vermont

CPAI Sample #	Laboratory I.D.#	Date Sampled	Location	Concentration (Lead)
16234-TCLP3	600752-001	01/03/25	South Hero Town Office, 333 US Route 2, South Hero, Vermont.	0.601 mg/L

Thirty (30) aliquots including: gypsum wallboard (painted), linoleum floor covering, plywood (unpainted), ceiling tile, hardwood doors (stained), carpet, paneling (stained), interior wood trim (painted & stained), fiberglass insulation, blown-in insulation, hardboard (unpainted), wood framing (unpainted), metal roofing, concrete (unpainted), wood door (stained).

Applicable regulations list a limit for lead of 5.0 milligrams per liter (ppm). Materials which are subject to a TCLP test and exceed this limit must be considered lead hazardous waste



Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117
804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer: Clay Point Associates, Inc. (1846)
Address: PO Box 1254
Williston, VT 05495

Order #: 600752

Matrix TCLP
Received 01/06/25
Reported 01/07/25

Attn:

Project:

Location:
Number: 16234

PO Number:

Sample ID	Cust. Sample ID	Location	Result	RL*	Units	Analysis Date	Analyst
Parameter		Method					
600752-001	16234-TCLP3						
Metals Analysis							
Lead		EPA 7000B / 1311	0.601	0.200	mg/L	01/07/25	SAJ

600752-01/07/25 02:34 PM


Reviewed By: **Ahmed Elnasseh**
Analyst

EPA TCLP Regulatory Limits

Parameter	Reg. Limit	Unit
Lead	5.00	mg/L

State Certifications

Method	Parameter	Virginia
EPA 7000B	Lead	VELAP Certified

State	Certificate Number
Virginia	VELAP 12761

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. Solid PPM = mg/kg | PPB = µg/kg and Water PPM = mg/L | PPB = µg/L. The test results apply to the sample as received.

Clay Point Associates, Inc.



600752

V:600\600752

jjoyce

Federal Express

1/6/2025 12:47:18 PM

818295397147

S 1

CHAIN OF CUSTODY FORM

CPAI Proj. #:

16234

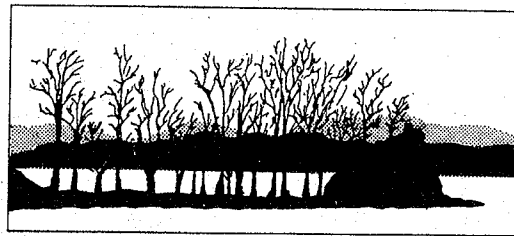
Type					Sample Number(s)
Asb?	Oth?	Air	Bulk	H2O	
	Pb X		TCLP X		16234-TCLP3

	Date	Time	Name	Signature
Transfer #1	1/3/25	4:00pm	Christe Herrmans	Christe Herrmans
to:		Schneider	Via Fedex	

Transfer #2				
to:				

Transfer #3				
to:				

Clay Point Associates, Inc.



Lead Based Paint Analysis Request Form

Date of Submission: 1/3/25 CPAI Proj. #: 16234

Analytical Service: Schneider

~~Fax Results to: (802) 879-0788~~ Email results to herrmans@claypointassociates.com
and hobson@claypointassociates.com

Sample Type	Results in	Turn Around Time
Lead in Dust Wipe <u>TCLP</u>	ug/sq. ft.	<u>5 day</u>
Lead in Paint Chip	ppm	
Lead In Soil	ppm	

Sample #	Sample Size (inches)
<u>16234-TCLP3</u>	<u>TCLP</u>

Sample #	Sample Size (inches)

Consultant Signature: Christie Herrmans Page No.: 1 of 1

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Lead Consulting Company

Clay Point Associates Inc

PO BOX 1254, 25 BISHOP AVE STE B-2
Williston, VT 05495

LICENSE: Lead-Co-Con-000002

EXPIRES: 5/21/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time.
This certificate is not transferable and is valid only for the above party. A licensed lead-based paint abatement supervisor must remain present on-site during all active phases of any permitted lead abatement project.

A copy of this certificate must be on the work site at all times.



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Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



Certificate of License - Vermont Asbestos and Lead Regulatory Program

Lead Inspector & Risk Assessor

Christer Herrmans

LICENSE: Lead-I/RA-000037

EXPIRES: 8/31/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.

A copy of this certificate must be on the work site at all times.



Any lead-based paint consulting activities must be performed in association with a Lead-based Paint Consulting Company licensed pursuant to the Vermont Regulations for Lead Control section 12.10.

Scan the QR Code for License Information

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov

Certificate of License - Vermont Asbestos and Lead Regulatory Program

Lead Analytical Company

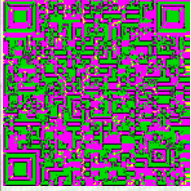
Schneider Laboratories Global Inc
2512 W Cary Street
Richmond, Virginia 23220

LICENSE: Lead-Co-An-000002
EXPIRES: 6/29/2025

This certificate shall remain in force until the expiration date unless revoked or voided before that time. This certificate is not transferable and is valid only for the above party.

Lead Analytical Company - Soil
Lead Analytical Company - Dust
Lead Analytical Company - Paint Chip

Vermont Department of Health
Environmental Health
280 State Drive
Waterbury, VT 05671-8350
ALRP@vermont.gov



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