



CMM Environmental  
 415 N 3<sup>rd</sup> Street  
 Rockford, IL 61107  
 Phone: (815) 968-1266 Fax: (877) 314-4319  
 www.cmmenvironmental.com

7/28/25

City of Rockford  
 425 E State St  
 Rockford, IL 61104

Re: **Asbestos Sampling 210 W Jefferson.**

Dear City of Rockford,

On July 14 and 15, 2025, CMM Environmental conducted limited asbestos sampling at the above referenced location. During the inspection it was noted that the building may contain mercury switches, light ballasts and other hazardous materials that should be addressed prior to demolition.

CMM's sampling of suspect asbestos containing materials were limited to the following:

- Floor Tile
- Plaster
- Vibration Dampener
- Wall Board
- Flooring
- Ceiling Tile
- Drywall
- Teracotta
- Glue Glob
- Fire Rated Drywall
- Tile
- Pipe Fittings
- Drywall
- Pipe Wrap
- Window Glazing

The sampling of suspect materials was limited to amounts determined to be efficient to identify their asbestos content.

Table 1 – Asbestos Containing Materials

Material Description	Material Location	Asbestos Type	Material Condition	Quantity
Pipe Fittings	Basement Bathroom	10% Chrysotile	Severely Damaged	TBD
Pipe Wrap	Basement South Center	30% Chrysotile	Severely Damaged	TBD
Ceiling Tile Glue	Basement Bowling	3% Chrysotile	Damaged	TBD
Wall Board	3 <sup>rd</sup> Floor Storage – W	15% Chrysotile	Damaged	TBD
Floor Tile	2 <sup>nd</sup> Floor Hall – East End	5% Chrysotile	Severely Damaged	TBD



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

Floor Tile 2	2 <sup>nd</sup> Floor Hall – East End	5% Chrysotile	Severely Damaged	TBD
Tile Floor – Adhesive	1 <sup>st</sup> Floor Bathroom	6% Chrysotile	Good	TBD
Floor Tile	Basement E Bath	4% Chrysotile	Severely Damaged	TBD
Floor Tile	Basement Entry	6% Chrysotile	Severely Damaged	TBD
Floor Tile 2	Basement Bowling	2% Chrysotile	Severely Damaged	TBD
Floor Tile	Basement Bowling	2% Chrysotile	Severely Damaged	TBD
Floor Tile	Basement Center Room	5% Chrysotile	Severely Damaged	TBD
Bolier	1 <sup>st</sup> Floor Boiler NE	Assumed Asbestos	Damaged	1 unit

- All quantities are estimated and any contractor should field verify quantities prior to bidding on this work.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

77 Illinois Administrative Code Chapter I Section 855.345 references sampling Miscellaneous Materials "...in a manner sufficient to determine whether material is asbestos containing materials (ACM) or not asbestos containing materials." CMM has determined this to be interpreted as the generally accepted industry standard protocol of "three (3) samples to make a negative result for asbestos and one (1) sample to make a positive result for asbestos," however sampling protocols are sometimes varied due to the limited amounts of suspect materials present.

A group letter or combination of letter and number was assigned to each Homogenous Material. This combination serves as a prefix to identify materials of similar composition, texture, color, and date of installation. Each sample was then assigned a sample number such as 01, 02, 03, etc.

All samples were identified on a signed and dated Chain-of-Custody document, which accompanied the samples to the laboratory.

To ensure both quality and objectivity, an independent laboratory was used. Laboratories are selected based on their current accreditations. The laboratory chosen participates in the National Voluntary Laboratory Accreditation Program (NVLAP) for quality control procedures (NVLAP Lab Code: 200399-0). As specified in 40 CFR Chapter I (1-1-87 edition) Part 763, Subpart F, Appendix A. Please feel free to contact the laboratory directly with any questions.

Suspected asbestos samples were analyzed using polarized light microscopy (PLM) / dispersion staining techniques in accordance with the EPA Method documents "US EPA 600/M4-82-020, 1982" & "US EPA 600/R-93/118, 1993". Detection limits for this type of analysis are approximately one percent (by volume).



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

**FRIABLE ASBESTOS** – material can be crumbled, pulverized, or reduced to powder by hand pressure; these materials must be removed prior to demolition activities and should be addressed during renovation activities that would disturb the material, such as thermal system insulation. The following friable asbestos containing materials were identified:

- Pipe Wrap
- Pipe Fittings (Basement Bathroom)

**CATEGORY 1 NON-FRIABLE** – material is pliable (not brittle), breaks by tearing rather than fracturing and does not easily release asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material, but do not need removal prior to demolition activities (handled as demolition material at a certified landfill) if they are in good condition and not rendered friable during handling, transporting, and disposal. However, most asbestos containing building materials on concrete substrate are removed prior to demolition activities to reduce the overall cost due to landfill charges and the fact that concrete cannot be left on site or recycled with these materials in place. Category I Non-Friable materials include resilient floor coverings, asphalt roofing materials, gaskets, and packing. The following types of Category I Non-Friable asbestos were identified:

- Floor Tile (FT 2<sup>nd</sup> Floor Hall East End, FT2 2<sup>nd</sup> Floor Hall East End, Basement E Bath, Basement Entry, FT Basement Center Room, FT2 Basement Bowling, FT Basement Bowling)
- Ceiling Tile Glue (Basement Bowling)
- Tile Adhesive (1<sup>st</sup> Floor Bathroom Floor)

**CATEGORY II NON-FRIABLE** – material is not pliable, breaks by fracturing rather than tearing, and does release some asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material and are removed prior to demolition activities since they are normally rendered friable during demolition and/or handling, transporting and disposal. Category II Non-Friable materials include any non-friable asbestos containing material that is not in Category I (i.e. transite siding). The following types of Category II Non-Friable asbestos were identified:

- Wall Board (3<sup>rd</sup> Floor Storage W)

**NON ASBESTOS CONTAINING MATERIALS** – The following materials were tested and found to contain *no* asbestos (or less than 1%):

- Floor Tile (2<sup>nd</sup> Floor Bar NW, 1<sup>st</sup> Floor Storage NW, 3<sup>rd</sup> Floor NW, FT2 1<sup>st</sup> Floor Hall E, FT2 Basement Center Room, 1<sup>st</sup> Floor Hall E)
- Pipe Fittings (1<sup>st</sup> floor boiler NE)
- Plaster
- Vibration Dampener
- Flooring
- Ceiling Tile
- Drywall
- Teracotta
- Glue Glob (2<sup>nd</sup> Floor Bar NW)
- Fire Rated Drywall
- Tile
- Drywall
- Window Glazing



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com

### **Recommendations / Directions / Instructions**

If a material is analyzed, by any method, and is found to contain any amount of asbestos, personnel disturbing the material should at a minimum, wear personnel protection such as NIOSH approved respirators and full body protective clothing. It is further recommended that the building and its occupants be protected against the possible exposure of airborne asbestos fibers.

If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM (USEPA Method 198.1). The owner/operator of the building may (1) elect to assume the amount to be greater than 1% and treat the material as asbestos-containing material or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result shall be used. Point counting shall be conducted only by direction of the client at the client's expense. The client assumes and retains all responsibility and authority to conduct point counting at their expense.

Contractors should use caution and be advised and directed that during renovation or demolition of a structure that concealed materials may be discovered, therefore, should suspect materials not identified in this inspection become exposed or made aware, you should cease operations that may disturb, dislodge or disrupt the material until it is sampled and analyzed for its possible asbestos content.

Samples were collected at the request of our client in a manner that should identify suspect areas as being asbestos containing or not, however, sample collection strategies may not satisfy the appropriate structure's governing agency's rules or policies. The results in this report are intended for the sole use of our client for their personnel's safety and should not be considered as an asbestos inspection. Should the client intend to submit these sampling results to the structure's governing agency, then CMM will need to extend our services to include compliance with the governing agency's policies / rules at an additional expense.

CMM Environmental recommends the use of certified and licensed asbestos personnel for **all** planned disturbance of known and suspect asbestos containing products. In accordance with IDPH, IEPA, U.S.EPA and OSHA regulations asbestos containing materials must be removed by and disposed of by a certified/licensed asbestos abatement personnel/contractor.

### **Definitions**

**Asbestos Containing Products** means, according to the U.S. EPA Method 600/R-93/116, Regulated Asbestos Containing Materials (RACM) are those materials found to contain greater than 1% asbestos per volume of bulk material sampled, by PLM. The term is not intended to include *de minimis* or inaccessible materials that do not present a risk of harm to public health and that generally would not be the subject of enforcement actions if brought to the attentions of appropriated regulatory agencies.

**Asbestos Types** are Chrysotile (white asbestos making up approximately 95% of all asbestos used in the United States), Amosite (brown asbestos making up approximately 5% of all asbestos used in the United States), Crocidolite (blue asbestos making up approximately less than 5% of all asbestos used in the United States), and rarely found in buildings are Anthophyllite, Tremolite & Actinolite.

**Friable Asbestos Material** means any material containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763 section 1, Polarized Light Microscopy, that, when dry, can be



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

crumbled, pulverized, or reduced to powder by hand pressure.

**Homogeneous Material** -- an area or group of Surfacing Materials, Thermal Systems Insulation, or Miscellaneous Materials that is uniform in color & texture and has the same installation date.

**Polarized Light Microscopy (PLM)** means an optical microscopy technique for analyzing bulk samples for asbestos in which the sample is illuminated with polarized light (light which vibrates in only one plane) to distinguish between different types of asbestos fibers by their shape and unique optical properties.

**Transmission Electron Microscopy (TEM)** means a method of microscopic analysis, which utilizes an electron beam that is focused onto a thin sample. As the beam penetrates (transmits) through the sample, the difference densities produces an image on a fluorescent screen from which samples can be identified and counted. Also used for analyzing air samples for asbestos.

### **Conclusion**

The conclusions of this report are CMM's professional opinions, based solely upon visual site observations and interpretations of laboratory analyses, as described in this report. The opinions presented herein apply to the site conditions existing at the time of CMM's investigation and interpretation of current regulations pertaining to asbestos. Therefore, CMM's opinions and recommendations may not apply to future conditions that may exist at the site, which we have not had the opportunity to evaluate. It should be noted that conditions change and that materials constantly degrade. All applicable federal, state and local regulations should always be verified prior to any work that will disturb or dislodge materials confirmed, assumed or presumed to contain asbestos.

CMM's assessment was limited to observation, sampling and the analysis of suspect asbestos containing products in accessible portions of the area(s) covered by this survey. Materials in the building that are not considered building materials, are unusual or *de minimis*, or were inaccessible, due to common construction techniques, to the inspector were excluded from the inspection. As a result, additional asbestos containing building materials may be present in inaccessible areas (e.g. between walls, ceiling spaces enclosed by wallboard, interior of fire doors, below grade exterior piping and sealants, etc.) of the structure that were not observed during the survey.

This inspection report is designed to assist the client in the understanding of the regulations regarding asbestos, however, it should not be used as a substitution for obtaining and familiarizing yourself with, including the compliance of, all asbestos related regulations including, but not limited to, 40 CFR, Chapter 61, Subpart M (National Emission Standard for Asbestos) prior to the start of any renovation or demolition activity that will disturb or dislodge asbestos containing materials or suspect/assumed asbestos containing materials.

This report has been prepared for the exclusive use of the intended client, for the specific application to the defined property as addressed in this report. Any additional user of this report shall determine the suitability of the material contained herein for their intended use, and any such user assumes all risks and liability in connection therewith. No claim is made that these findings will remain applicable to future site activities and conditions. Interpretations by any such user from information contained in this report or the drawing of conclusions by any such user from information contained in this report shall be undertaken solely at the risk of said party.

At all times during the performance of the inspection, safety was a priority. Due to the emphasis on safety, there were no injuries, there was no building contamination, and there were no asbestos exposures to either CMM personnel or building occupants.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

This report remains the sole property of CMM. The contents herein cannot be copied, scanned, duplicated, disclosed or distributed in whole or in part until complete and full payment has been received, or arraigned, for the complete services rendered, expenses incurred and/or, all legal, collection, and judgment fees afforded to CMM. either by contractual agreement or satisfactory judgments.

CMM. would like to thank you for the opportunity to be of service to you on this project. We hope that our performance has warranted the opportunity to work with you on future projects.

I hereby certify that all documents and work products prepared hereunder comply with all applicable laws and regulations, including, but not limited to, 105 ILCS 105, 225 ILCS 207 and 77 Ill. Adm. Code 855."

Signed,

A handwritten signature in dark ink, appearing to read 'Chris Manuel', is written over a horizontal line.

Chris Manuel  
President  
Inspector # 100-20143



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix A (Lab Report)





CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



### EMSL Analytical, Inc.

4140 Lift Drive Hillside, IL 80182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262506578

Customer ID: CMM475

Customer PO:

Project ID:

Attention: Chris Manuel  
CMM Environmental  
415 N 3rd St  
Rockford, IL 61107

Phone: (815) 218-3784

Fax:

Received Date: 07/18/2025 10:15 AM

Analysis Date: 07/23/2025 - 07/24/2025

Collected Date:

Project: ELKS LODGE

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
001 262506578-0001	PF-BASEMENT BATH	White Non-Fibrous Homogeneous	20% Min. Wool	70% Non-fibrous (Other)	10% Chrysotile
002 262506578-0002	PF-BASEMENT BATH				Positive Stop (Not Analyzed)
003 262506578-0003	PF-BASEMENT BATH				Positive Stop (Not Analyzed)
004 262506578-0004	PW-BASEMENT SOUTH CENTER	Brown Fibrous Homogeneous	65% Cellulose	5% Non-fibrous (Other)	30% Chrysotile
005 262506578-0005	PW-BASEMENT SOUTH CENTER				Positive Stop (Not Analyzed)
006 262506578-0006	PW-BASEMENT SOUTH CENTER				Positive Stop (Not Analyzed)
007-Skim Coat 262506578-0007	PLASTER-3RD FLOOR NW	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
007-Base Coat 262506578-0007A	PLASTER-3RD FLOOR NW	Gray Non-Fibrous Homogeneous	2% Hair	98% Non-fibrous (Other)	None Detected
008-Skim Coat 262506578-0008	PLASTER-3RD FLOOR NW	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
008-Base Coat 262506578-0008A	PLASTER-3RD FLOOR NW	Gray Non-Fibrous Homogeneous	2% Hair	98% Non-fibrous (Other)	None Detected
009-Skim Coat 262506578-0009	PLASTER-1ST FLOOR ENTRY	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
009-Base Coat 262506578-0009A	PLASTER-1ST FLOOR ENTRY	Gray Non-Fibrous Homogeneous	2% Hair	98% Non-fibrous (Other)	None Detected
010-Ceiling Tile 262506578-0010	CT-BASEMENT BOWLING	Brown Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
010-Glue 262506578-0010A	CT-BASEMENT BOWLING	Brown Non-Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
011-Ceiling Tile 262506578-0011	CT-BASEMENT BOWLING	Brown Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
011-Glue 262506578-0011A	CT-BASEMENT BOWLING				Positive Stop (Not Analyzed)

Initial report from: 07/24/2025 11:57:32



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com

**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com> / [chicagolab@emsl.com](mailto:chicagolab@emsl.com)

EMSL Order: 262506578

Customer ID: CMM475

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
012-Ceiling Tile	CT-BASEMENT BOWLING	Brown/White Fibrous	98% Cellulose	2% Non-fibrous (Other)	None Detected
262506578-0012		Homogeneous			
012-Glue	CT-BASEMENT BOWLING				Positive Stop (Not Analyzed)
262506578-0012A					
013	DW-3RD FLOOR CRAWL SPACE	Brown/White Non-Fibrous	10% Cellulose	90% Non-fibrous (Other)	None Detected
262506578-0013		Homogeneous			
014	DW-3RD FLOOR CRAWL SPACE	Brown/White Non-Fibrous	10% Cellulose	90% Non-fibrous (Other)	None Detected
262506578-0014		Homogeneous			
015	DW-1ST FLOOR ENTRY	Brown/White Non-Fibrous	10% Cellulose 2% Glass	88% Non-fibrous (Other)	None Detected
262506578-0015		Homogeneous			
016	WB-3RD FLOOR STORAGE -W	Gray Non-Fibrous		85% Non-fibrous (Other)	15% Chrysotile
262506578-0016		Homogeneous			
017	WB-3RD FLOOR STORAGE -W				Positive Stop (Not Analyzed)
262506578-0017					
018	WB-3RD FLOOR STORAGE -W				Positive Stop (Not Analyzed)
262506578-0018					
019-Ceramic Tile	TILE -WALL -1ST FLOOR BATH	Green Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0019		Homogeneous			
019-Glue	TILE -WALL -1ST FLOOR BATH	Yellow Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0019A		Homogeneous			
020-Ceramic Tile	TILE -WALL -1ST FLOOR BATH	Green Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0020		Homogeneous			
020-Glue	TILE -WALL -1ST FLOOR BATH	Yellow Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0020A		Homogeneous			
021-Ceramic Tile	TILE -WALL -1ST FLOOR BATH	Green Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0021		Homogeneous			
021-Glue	TILE -WALL -1ST FLOOR BATH	Yellow Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0021A		Homogeneous			
022-Floor Tile	FT-2ND FLOOR HALL-EAST END	Brown Non-Fibrous		95% Non-fibrous (Other)	5% Chrysotile
262506578-0022		Homogeneous			
022-Mastic	FT-2ND FLOOR HALL-EAST END	Black Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0022A		Homogeneous			
023-Floor Tile	FT-2ND FLOOR HALL-EAST END				Positive Stop (Not Analyzed)
262506578-0023					
023-Mastic	FT-2ND FLOOR HALL-EAST END	Black Non-Fibrous		100% Non-fibrous (Other)	None Detected
262506578-0023A		Homogeneous			
024-Floor Tile	FT-2ND FLOOR HALL-EAST END				Positive Stop (Not Analyzed)
262506578-0024					

Initial report from: 07/24/2025 11:57:32



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



# **EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262506578  
Customer ID: CMM75  
Customer PO:  
Project ID:

## **Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
024-Mastic 262506578-0024A	FT-2ND FLOOR HALL-EAST END	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
025-Floor Tile 262506578-0025	FT 2-2ND FLOOR HALL-EAST END	Gray Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
025-Mastic 262506578-0025A	FT 2-2ND FLOOR HALL-EAST END	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
025-Underlayment 262506578-0025B	FT 2-2ND FLOOR HALL-EAST END	Brown/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
026-Floor Tile 262506578-0026	FT 2-2ND FLOOR HALL-EAST END				Positive Stop (Not Analyzed)
026-Mastic 262506578-0026A	FT 2-2ND FLOOR HALL-EAST END	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
026-Underlayment 262506578-0026B	FT 2-2ND FLOOR HALL-EAST END	Brown/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
027-Floor Tile 262506578-0027	FT 2-2ND FLOOR HALL-EAST END				Positive Stop (Not Analyzed)
027-Mastic 262506578-0027A	FT 2-2ND FLOOR HALL-EAST END	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
027-Underlayment 262506578-0027B	FT 2-2ND FLOOR HALL-EAST END	Brown/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
028-Ceramic Tile 262506578-0028	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
028-Grout 262506578-0028A	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
028-Adhesive 262506578-0028B	TILE -FLOOR -1ST FLOOR BATH	Black Non-Fibrous Homogeneous		94% Non-fibrous (Other)	6% Chrysotile
029-Ceramic Tile 262506578-0029	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
029-Grout 262506578-0029A	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
029-Adhesive 262506578-0029B	TILE -FLOOR -1ST FLOOR BATH				Positive Stop (Not Analyzed)
030-Ceramic Tile 262506578-0030	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
030-Grout 262506578-0030A	TILE -FLOOR -1ST FLOOR BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
030-Adhesive 262506578-0030B	TILE -FLOOR -1ST FLOOR BATH				Positive Stop (Not Analyzed)

Initial report from: 07/24/2025 11:57:32



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com

**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262508578

Customer ID: CMM475

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
031-Skim Coat 262506578-0031	PLASTER -2ND FLOOR BATHROOM SW	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
031-Base Coat 262506578-0031A	PLASTER -2ND FLOOR BATHROOM SW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
031-Drywall 262506578-0031B	PLASTER -2ND FLOOR BATHROOM SW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
032-Skim Coat 262506578-0032	PLASTER -2ND FLOOR BATHROOM SW	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
032-Base Coat 262506578-0032A	PLASTER -2ND FLOOR BATHROOM SW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
032-Drywall 262506578-0032B	PLASTER -2ND FLOOR BATHROOM SW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
033-Skim Coat 262506578-0033	PLASTER -2ND FLOOR BATHROOM SW	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
033-Base Coat 262506578-0033A	PLASTER -2ND FLOOR BATHROOM SW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
033-Drywall 262506578-0033B	PLASTER -2ND FLOOR BATHROOM SW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
034 262506578-0034	GG-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
035 262506578-0035	GG-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
036 262506578-0036	GG-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
037-Flooring 262506578-0037	FLOORING -2ND FLOOR -BAR COUNTER NW	Gray Non-Fibrous Homogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
037-Mastic 262506578-0037A	FLOORING -2ND FLOOR -BAR COUNTER NW	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
038-Flooring 262506578-0038	FLOORING -2ND FLOOR -BAR COUNTER NW	Gray Non-Fibrous Homogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
038-Mastic 262506578-0038A	FLOORING -2ND FLOOR -BAR COUNTER NW	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
039-Flooring 262506578-0039	FLOORING -2ND FLOOR -BAR COUNTER NW	Gray Non-Fibrous Homogeneous	15% Cellulose 3% Synthetic 2% Glass	80% Non-fibrous (Other)	None Detected
039-Mastic 262506578-0039A	FLOORING -2ND FLOOR -BAR COUNTER NW	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
040 262506578-0040	CT-2ND FLOOR W END	Gray/Beige Fibrous Homogeneous	95% Min. Wool	5% Non-fibrous (Other)	None Detected

Initial report from: 07/24/2025 11:57:32





CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



### EMSL Analytical, Inc.

4140 Lift Drive Hillside, IL 60182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com> / [chicagolab@emsl.com](mailto:chicagolab@emsl.com)

EMSL Order: 262508578  
Customer ID: CMMAT5  
Customer PO:  
Project ID:

### Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
041 262506578-0041	CT-2ND FLOOR W END	Gray/Belge Fibrous Homogeneous	95% Min. Wool	5% Non-fibrous (Other)	None Detected
042 262506578-0042	CT-2ND FLOOR W END	Gray/Belge Fibrous Homogeneous	95% Min. Wool	5% Non-fibrous (Other)	None Detected
043 262506578-0043	VD-1ST FLOOR STORAGE CENTER SOUTH	Black/Silver Non-Fibrous Homogeneous	40% Glass	60% Non-fibrous (Other)	None Detected
044 262506578-0044	VD-1ST FLOOR STORAGE CENTER SOUTH	Black/Silver Non-Fibrous Homogeneous	40% Glass	60% Non-fibrous (Other)	None Detected
045 262506578-0045	VD-1ST FLOOR STORAGE CENTER SOUTH	Black/Silver Non-Fibrous Homogeneous	40% Glass	60% Non-fibrous (Other)	None Detected
046-Floor Tile 262506578-0046	FT-2ND FLOOR BAR-NW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
046-Mastic 262506578-0046A	FT-2ND FLOOR BAR-NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
046-Flooring 262506578-0046B	FT-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
047-Floor Tile 262506578-0047	FT-2ND FLOOR BAR-NW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
047-Mastic 262506578-0047A	FT-2ND FLOOR BAR-NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
047-Flooring 262506578-0047B	FT-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
048-Floor Tile 262506578-0048	FT-2ND FLOOR BAR-NW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
048-Mastic 262506578-0048A	FT-2ND FLOOR BAR-NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
048-Flooring 262506578-0048B	FT-2ND FLOOR BAR-NW	Brown Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
049-Floor Tile 262506578-0049	FT-1ST FLOOR STORAGE -NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
049-Mastic 262506578-0049A	FT-1ST FLOOR STORAGE -NW	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
050-Floor Tile 262506578-0050	FT-1ST FLOOR STORAGE -NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
050-Mastic 262506578-0050A	FT-1ST FLOOR STORAGE -NW	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
051-Floor Tile 262506578-0051	FT-1ST FLOOR STORAGE -NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 07/24/2025 11:57:32



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



### EMSL Analytical, Inc.

4140 Lift Drive Hillside, IL 80182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262508578

Customer ID: CMM475

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E**  
**Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
051-Mastic 262506578-0051A	FT-1ST FLOOR STORAGE -NW	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
052 262506578-0052	FIRE BOARD -2ND FLOOR BAR CEILING -NW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
053 262506578-0053	FIRE BOARD -2ND FLOOR BAR CEILING -NW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
054 262506578-0054	FIRE BOARD -2ND FLOOR BAR CEILING -NW	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
055 262506578-0055	FLOORING -1ST FLOOR CLOSET N	Gray/Red Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
056 262506578-0056	FLOORING -1ST FLOOR CLOSET N	Gray/Red Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
057 262506578-0057	FLOORING -1ST FLOOR CLOSET N	Gray/Red Non-Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
058-Flooring 262506578-0058	FLOORING -1ST FLOOR E ROOM	Gray/Red Non-Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
058-Mastic 262506578-0058A	FLOORING -1ST FLOOR E ROOM	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
059-Flooring 262506578-0059	FLOORING -1ST FLOOR E ROOM	Gray/Red Non-Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
059-Mastic 262506578-0059A	FLOORING -1ST FLOOR E ROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
060-Flooring 262506578-0060	FLOORING -1ST FLOOR E ROOM	Gray/Red Non-Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
060-Mastic 262506578-0060A	FLOORING -1ST FLOOR E ROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
061-Rubber Membrane 262506578-0061	VD-3RD FLOOR STORAGE -W	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
061-Wrap 262506578-0061A	VD-3RD FLOOR STORAGE -W	White Fibrous Homogeneous	98% Glass	2% Non-fibrous (Other)	None Detected
062-Rubber Membrane 262506578-0062	VD-3RD FLOOR STORAGE -W	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
062-Wrap 262506578-0062A	VD-3RD FLOOR STORAGE -W	White Fibrous Homogeneous	98% Glass	2% Non-fibrous (Other)	None Detected
063-Rubber Membrane 262506578-0063	VD-3RD FLOOR STORAGE -W	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
063-Wrap 262506578-0063A	VD-3RD FLOOR STORAGE -W	White Fibrous Homogeneous	98% Glass	2% Non-fibrous (Other)	None Detected

Initial report from: 07/24/2025 11:57:32



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



# **EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262506578  
Customer ID: CMM475  
Customer PO:  
Project ID:

## **Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
064-Floor Tile 262506578-0064	FT- 3RD FLOOR NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
064-Adhesive 262506578-0064A	FT- 3RD FLOOR NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
065-Floor Tile 262506578-0065	FT- 3RD FLOOR NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
065-Adhesive 262506578-0065A	FT- 3RD FLOOR NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
066-Floor Tile 262506578-0066	FT- 3RD FLOOR NW	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
066-Adhesive 262506578-0066A	FT- 3RD FLOOR NW	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
067-Ceramic Tile 262506578-0067	TILE -FLOOR BASEMENT BATH	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
067-Grout 262506578-0067A	TILE -FLOOR BASEMENT BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
068-Ceramic Tile 262506578-0068	TILE -FLOOR BASEMENT BATH	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
068-Grout 262506578-0068A	TILE -FLOOR BASEMENT BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
069-Ceramic Tile 262506578-0069	TILE -FLOOR BASEMENT BATH	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
069-Grout 262506578-0069A	TILE -FLOOR BASEMENT BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
070 262506578-0070	FLOORING -3RD FLOOR STORAGE W	Brown Non-Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
071 262506578-0071	FLOORING -3RD FLOOR STORAGE W	Brown Non-Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
072 262506578-0072	FLOORING -3RD FLOOR STORAGE W	Brown Non-Fibrous Homogeneous	20% Cellulose	80% Non-fibrous (Other)	None Detected
073-Floor Tile 262506578-0073	FT-BASEMENT E BATH	Tan Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
073-Mastic 262506578-0073A	FT-BASEMENT E BATH	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
074-Floor Tile 262506578-0074	FT-BASEMENT E BATH				Positive Stop (Not Analyzed)
074-Mastic 262506578-0074A	FT-BASEMENT E BATH	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 07/24/2025 11:57:32



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com

**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 60182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com> / [chicagolab@emsl.com](mailto:chicagolab@emsl.com)

EMSL Order: 262506578

Customer ID: CMM475

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
075-Floor Tile	FT-BASEMENT E BATH				Positive Stop (Not Analyzed)
262506578-0075					
075-Mastic	FT-BASEMENT E BATH	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0075A					
076	TERRACOTTA-2ND FLOOR HALL	Tan/White Non-Fibrous Homogeneous	4% Cellulose	96% Non-fibrous (Other)	None Detected
262506578-0076					
077	TERRACOTTA-2ND FLOOR HALL	Tan/White Non-Fibrous Homogeneous	4% Cellulose	96% Non-fibrous (Other)	None Detected
262506578-0077					
078	TERRACOTTA-2ND FLOOR HALL	Tan/White Non-Fibrous Homogeneous	4% Cellulose	96% Non-fibrous (Other)	None Detected
262506578-0078					
079	FT 2-1ST FLOOR HALL E	Brown/Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
262506578-0079					
080	FT 2-1ST FLOOR HALL E	Brown/Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
262506578-0080					
081	FT 2-1ST FLOOR HALL E	Brown/Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
262506578-0081					
082-Floor Tile	FT 2-BASEMENT CENTER ROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0082					
082-Mastic	FT 2-BASEMENT CENTER ROOM	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0082A					
083-Floor Tile	FT 2-BASEMENT CENTER ROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0083					
083-Mastic	FT 2-BASEMENT CENTER ROOM	Black/Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0083A					
084-Floor Tile	FT 2-BASEMENT CENTER ROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0084					
084-Mastic	FT 2-BASEMENT CENTER ROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0084A					
085-Floor Tile	FT-BASEMENT ENTRY	Tan Non-Fibrous Homogeneous		94% Non-fibrous (Other)	6% Chrysotile
262506578-0085					
085-Mastic	FT-BASEMENT ENTRY	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0085A					
086-Floor Tile	FT-BASEMENT ENTRY				Positive Stop (Not Analyzed)
262506578-0086					
086-Mastic	FT-BASEMENT ENTRY	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0086A					
087-Floor Tile	FT-BASEMENT ENTRY				Positive Stop (Not Analyzed)
262506578-0087					

Initial report from: 07/24/2025 11:57:32





CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com

**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 60182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com> / [chicagolab@emsl.com](mailto:chicagolab@emsl.com)

EMSL Order: 262508578

Customer ID: CMMAT5

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
087-Mastic 262506578-0087A	FT-BASEMENT ENTRY	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
088 262506578-0088	FT-1ST FLOOR HALL E	Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
089 262506578-0089	FT-1ST FLOOR HALL E	Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
090 262506578-0090	FT-1ST FLOOR HALL E	Gray/Black Non-Fibrous Homogeneous	40% Cellulose	60% Non-fibrous (Other)	None Detected
091-Ceiling Tile 262506578-0091	CT-BASEMENT HALL	Gray Fibrous Homogeneous	98% Min. Wool	2% Non-fibrous (Other)	None Detected
091-Glue 262506578-0091A	CT-BASEMENT HALL	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
092-Ceiling Tile 262506578-0092	CT-BASEMENT HALL	Gray Fibrous Homogeneous	98% Min. Wool	2% Non-fibrous (Other)	None Detected
092-Glue 262506578-0092A	CT-BASEMENT HALL	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
093-Ceiling Tile 262506578-0093	CT-BASEMENT HALL	Gray Fibrous Homogeneous	98% Min. Wool	2% Non-fibrous (Other)	None Detected
093-Glue 262506578-0093A	CT-BASEMENT HALL	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
094 262506578-0094	VD-BASEMENT MECH	White/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
095 262506578-0095	VD-BASEMENT MECH	White/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
096 262506578-0096	VD-BASEMENT MECH	Brown Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
097 262506578-0097	PF-1ST FLOOR BOILER NE	Gray Non-Fibrous Homogeneous	20% Min. Wool	80% Non-fibrous (Other)	None Detected
098 262506578-0098	PF-1ST FLOOR BOILER NE	Gray Non-Fibrous Homogeneous	20% Min. Wool	80% Non-fibrous (Other)	None Detected
099 262506578-0099	PF-1ST FLOOR BOILER NE	Gray Non-Fibrous Homogeneous	20% Min. Wool	80% Non-fibrous (Other)	None Detected
100-Floor Tile 262506578-0100	FT-BASEMENT CENTER ROOM	Brown Non-Fibrous Homogeneous		95% Non-fibrous (Other)	6% Chrysotile
100-Mastic 262506578-0100A	FT-BASEMENT CENTER ROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
101-Floor Tile 262506578-0101	FT-BASEMENT CENTER ROOM				Positive Stop (Not Analyzed)

Initial report from: 07/24/2025 11:57:32



CMM Environmental  
 415 N 3<sup>rd</sup> Street  
 Rockford, IL 61107  
 Phone: (815) 968-1266 Fax: (877) 314-4319  
 www.cmmenvironmental.com



# **EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 60182  
 Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262506578  
 Customer ID: CMM475  
 Customer PO:  
 Project ID:

## **Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
101-Mastic 262506578-0101A	FT-BASEMENT CENTER ROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
102-Floor Tile 262506578-0102	FT-BASEMENT CENTER ROOM				Positive Stop (Not Analyzed)
102-Mastic 262506578-0102A	FT-BASEMENT CENTER ROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
103-Ceramic Tile 262506578-0103	TILE -WALL BASEMENT BATH	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
103-Mortar 262506578-0103A	TILE -WALL BASEMENT BATH	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
104 262506578-0104	TILE -WALL BASEMENT BATH	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
105-Ceramic Tile 262506578-0105	TILE -WALL BASEMENT BATH	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
105-Mortar 262506578-0105A	TILE -WALL BASEMENT BATH	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
106-Floor Tile 262506578-0106	FT 2-BASEMENT BOWL	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
106-Mastic 262506578-0106A	FT 2-BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
107-Floor Tile 262506578-0107	FT 2-BASEMENT BOWL				Positive Stop (Not Analyzed)
107-Mastic 262506578-0107A	FT 2-BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
108-Floor Tile 262506578-0108	FT 2-BASEMENT BOWL				Positive Stop (Not Analyzed)
108-Mastic 262506578-0108A	FT 2-BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
109-Floor Tile 262506578-0109	FT -BASEMENT BOWL	Gray/Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
109-Mastic 262506578-0109A	FT -BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
110-Floor Tile 262506578-0110	FT -BASEMENT BOWL				Positive Stop (Not Analyzed)
110-Mastic 262506578-0110A	FT -BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111-Floor Tile 262506578-0111	FT -BASEMENT BOWL				Positive Stop (Not Analyzed)

Initial report from: 07/24/2025 11:57:32



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com

**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262508578

Customer ID: CMMAT5

Customer PO:

Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
111-Mastic	FT-BASEMENT BOWL	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0111A					
112	WG-EXT N SIDE	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0112					
113	WG-EXT N SIDE	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0113					
114	WG-EXT N SIDE	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
262506578-0114					
115	VD-BASEMENT REC ROOM	White/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
262506578-0115					
116	VD-BASEMENT REC ROOM	White/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
262506578-0116					
117	VD-BASEMENT REC ROOM	White/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
262506578-0117					

Analyst(s)

Mazen Elkhatib (66)

Michael Eppeley (43)

Shanya Pugh (41)

James Hahn, Laboratory Manager  
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and meet method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("Final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-flammable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

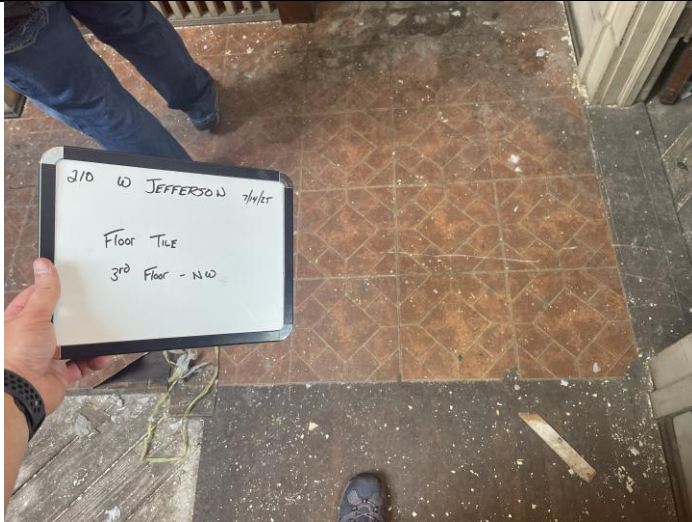
Samples analyzed by EMSL Analytical, Inc. Hillside, IL NVLAP Lab Code 200399-0

Initial report from: 07/24/2025 11:57:32



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix B (Pictures & Floor Plan)

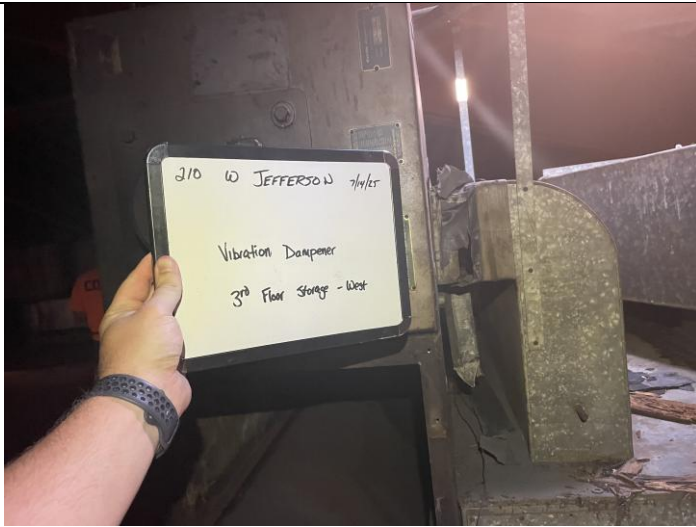


Date: 7/14/25  
Location: 3<sup>rd</sup> Floor NW  
Description: Floor Tile

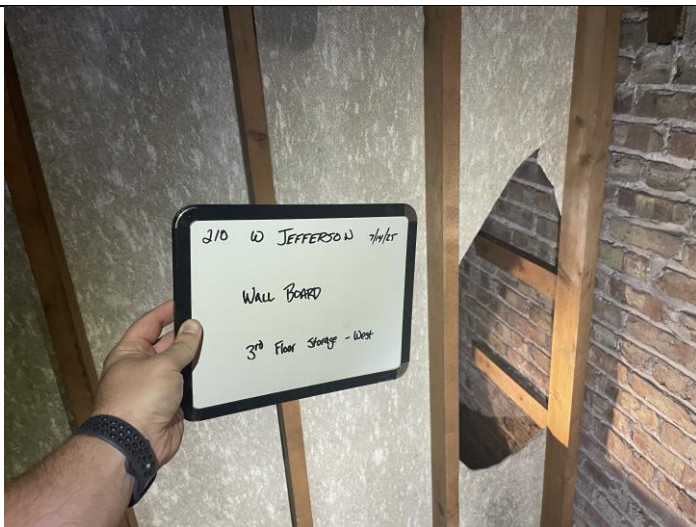


Date: 7/14/25  
Location: 3<sup>rd</sup> Floor NW  
Description: Plaster

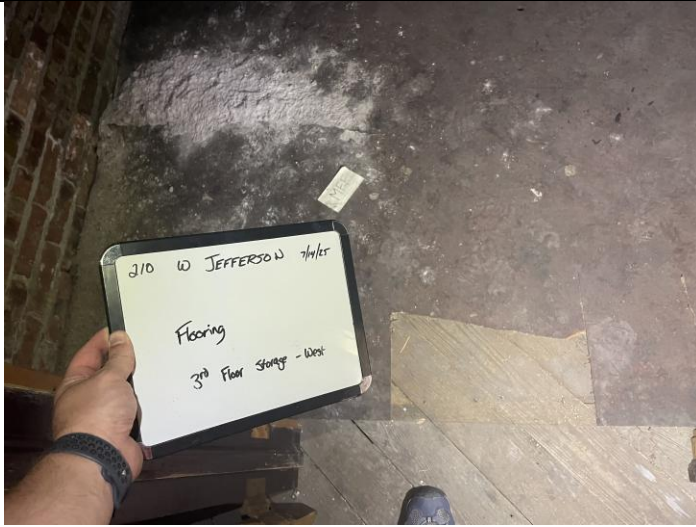




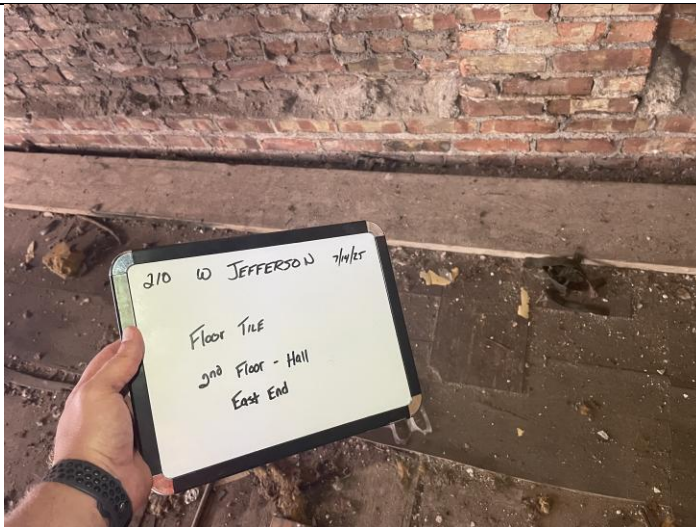
Date: 7/14/25  
Location: 3<sup>rd</sup> Floor Storage West  
Description: Vibration Dampener



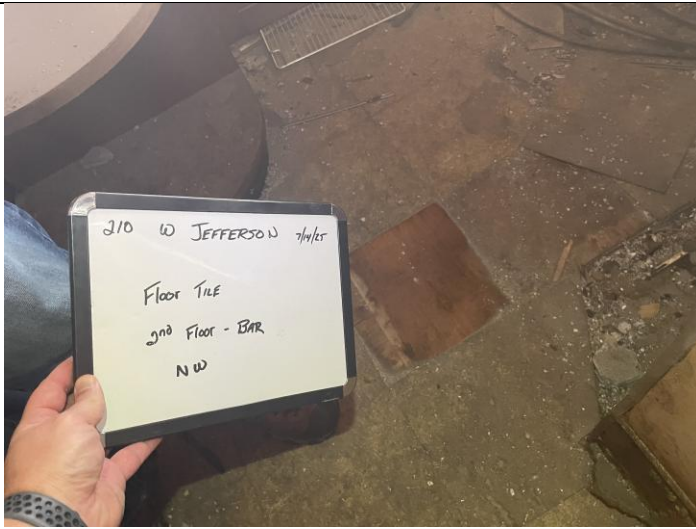
Date: 7/14/25  
Location: 3<sup>rd</sup> Floor Storage West  
Description: Wall Board



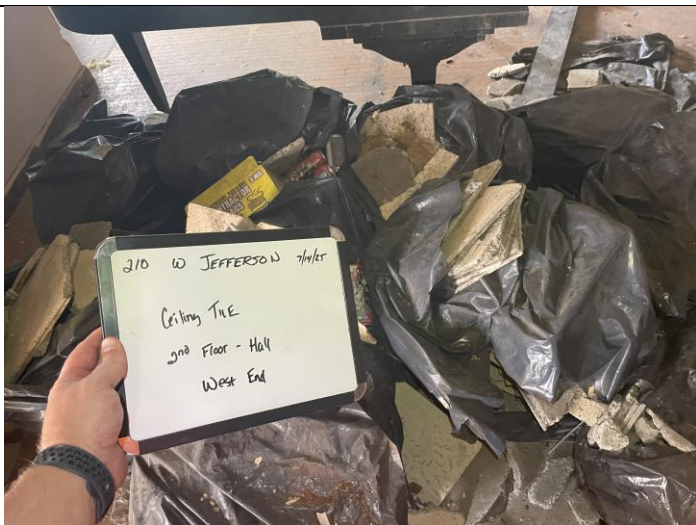
Date: 7/14/25  
 Location: 3<sup>rd</sup> Floor Storage West  
 Description: Flooring



Date: 7/14/25  
 Location: 2<sup>nd</sup> Floor Hall East End  
 Description: Floor Tile



Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Bar NW  
Description: Floor Tile

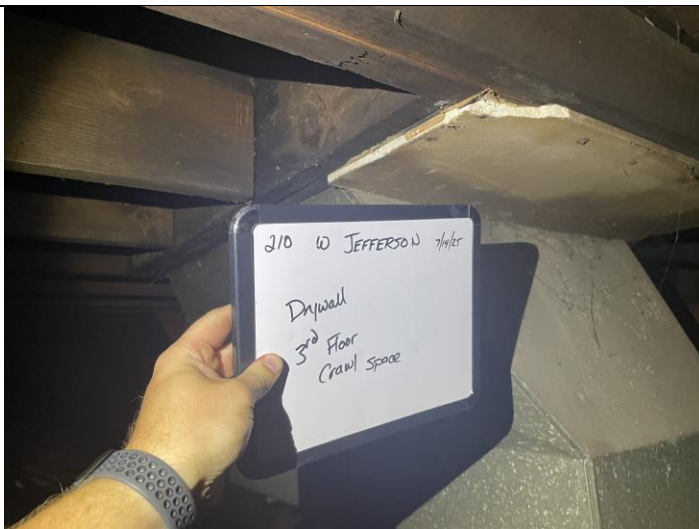


Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Hall West End  
Description: Ceiling Tile





Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Hall East End  
Description: Floor Tile 2



Date: 7/14/25  
Location: 3<sup>rd</sup> Floor Crawl Space  
Description: Drywall



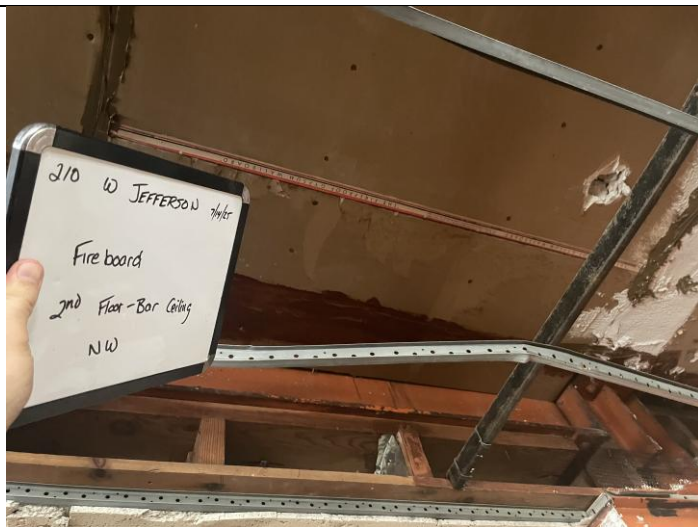
Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Hall  
Description: Teracotta



Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Bathroom SW  
Description: Plaster



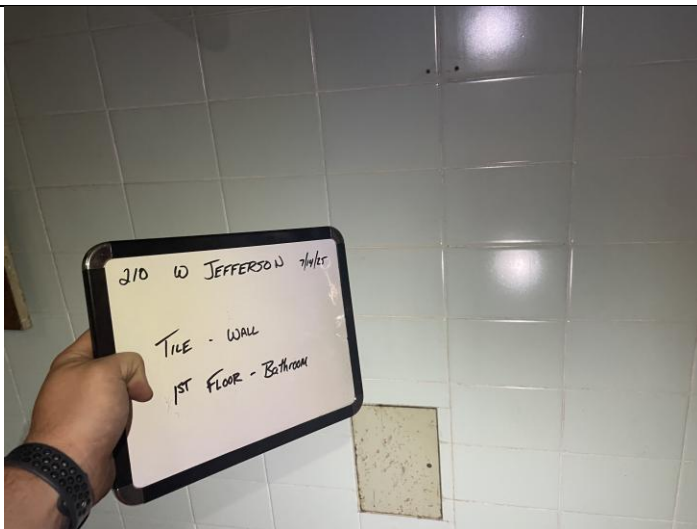
Date: 7/14/25  
 Location: 2<sup>nd</sup> Floor Bar NW  
 Description: Glue Glob



Date: 7/14/25  
 Location: 2<sup>nd</sup> Floor Bar Ceiling  
 Description: Fire Board - Drywall

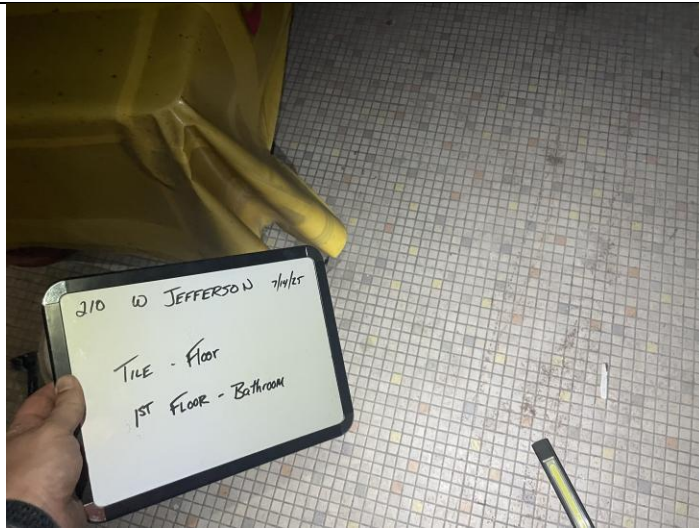


Date: 7/14/25  
Location: 2<sup>nd</sup> Floor Bar Counter NW  
Description: Flooring



Date: 7/14/25  
Location: Tile Wall  
Description: 1<sup>st</sup> Floor Bathroom





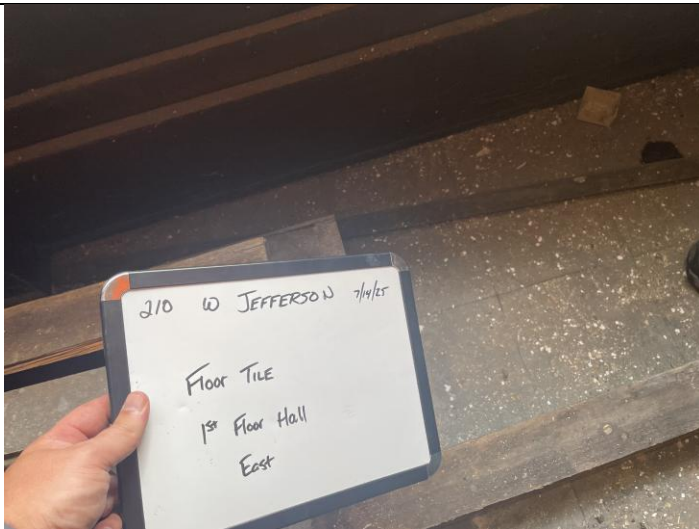
Date: 7/14/25  
 Location: Tile Floor  
 Description: 1<sup>st</sup> Floor Bathroom



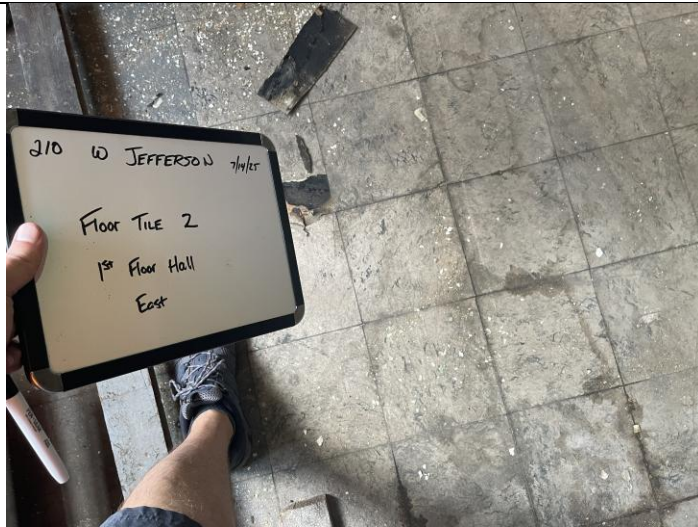
Date: 7/14/25  
 Location: 1<sup>st</sup> Floor Storage Center South  
 Description: Vibration Dampener



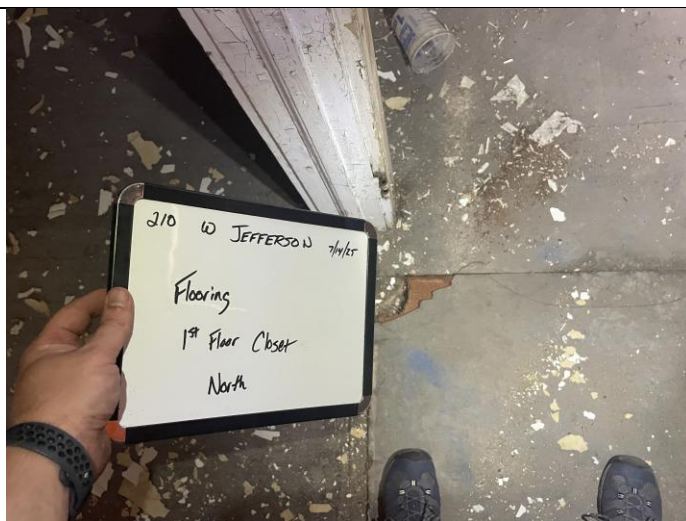
Date: 7/14/25  
 Location: 1<sup>st</sup> Floor NE Corner  
 Description: Boiler (assumed asbestos content)



Date: 7/14/25  
 Location: 1<sup>st</sup> Floor Hall East  
 Description: Floor Tile



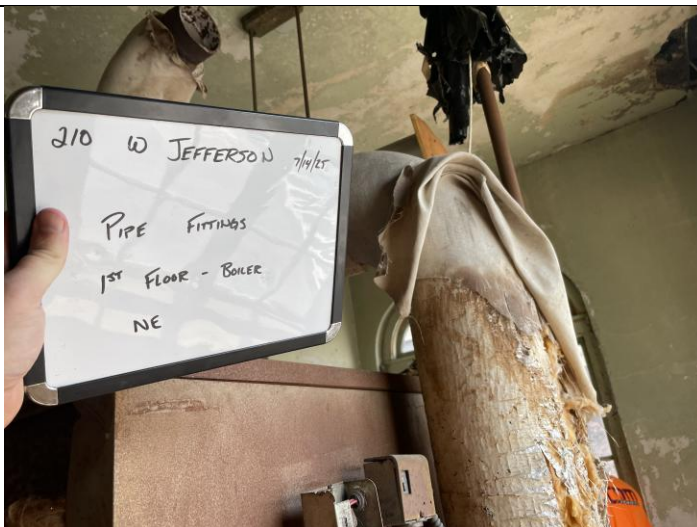
Date: 7/14/25  
 Location: 1<sup>st</sup> Floor Hall East  
 Description: Floor Tile 2



Date: 7/14/25  
 Location: 1<sup>st</sup> Floor Closet North  
 Description: Flooring

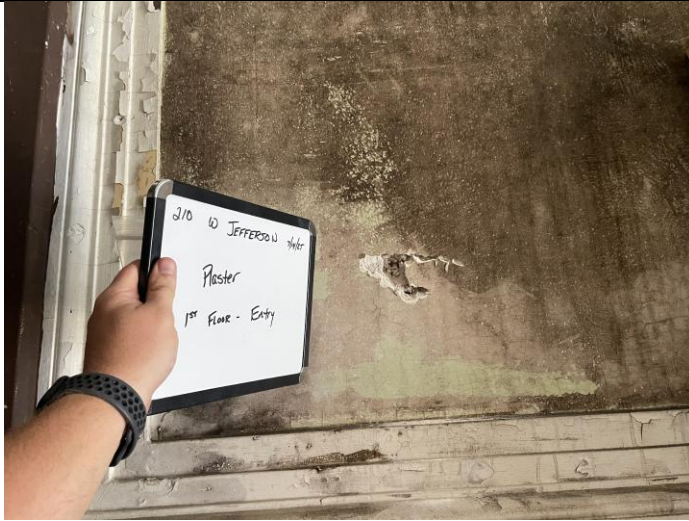


Date: 7/14/25  
Location: 1<sup>st</sup> Floor Storage NW  
Description: Floor Tile

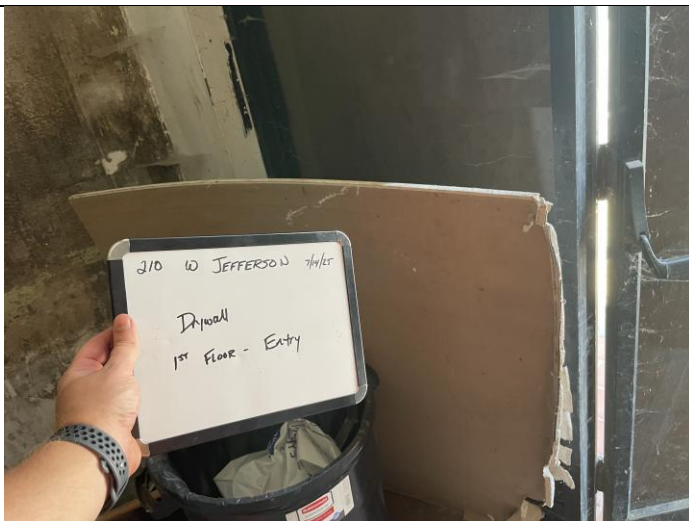


Date: 7/14/25  
Location: 1<sup>st</sup> Floor Boiler NE  
Description: Pipe Fitting





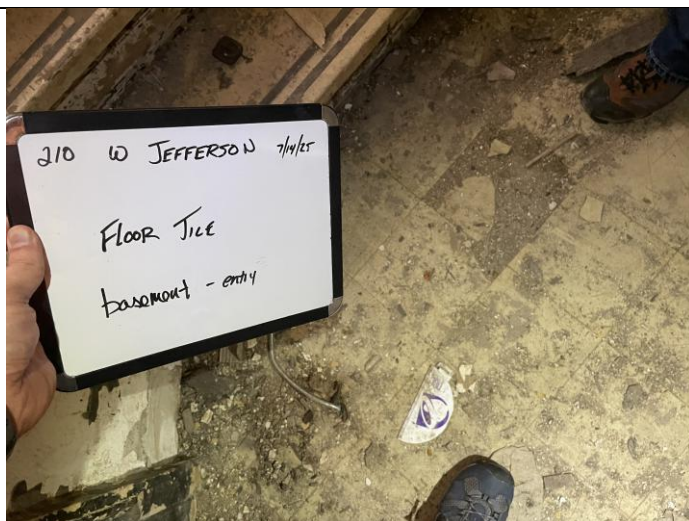
Date: 7/14/25  
Location: 1<sup>st</sup> Floor Entry  
Description: Plaster



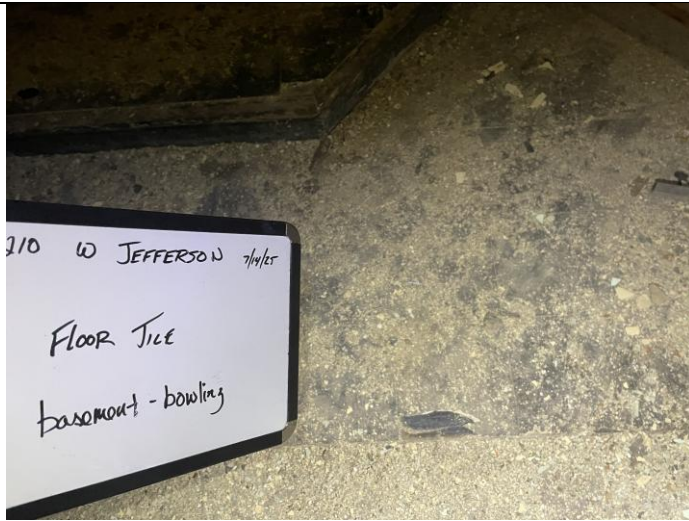
Date: 7/14/25  
Location: 1<sup>st</sup> Floor Entry  
Description: Drywall



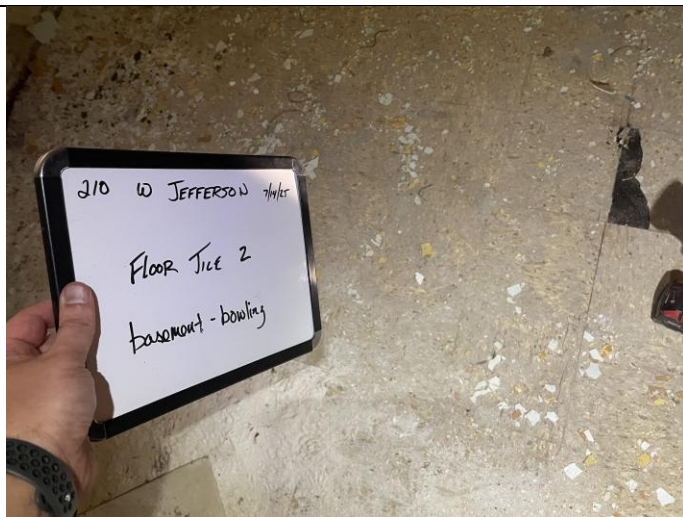
Date: 7/14/25  
Location: Basement Bowling  
Description: Ceiling Tile and Glue



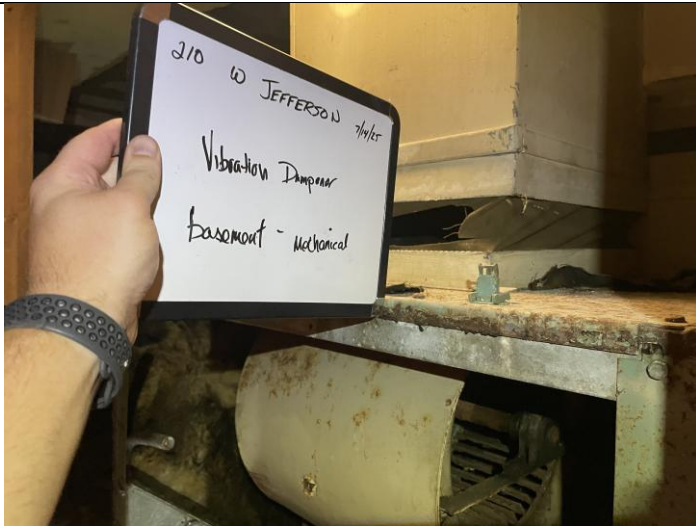
Date: 7/14/25  
Location: Basement Entry  
Description: Floor Tile



Date: 7/14/25  
 Location: Basement Bowling  
 Description: Floor Tile



Date: 7/14/25  
 Location: Basement Bowling  
 Description: Floor Tile 2



Date: 7/14/25  
Location: Basement Mechanical  
Description: Vibration Dampener



Date: 7/14/25  
Location: Basement Bathroom  
Description: Tile Wall



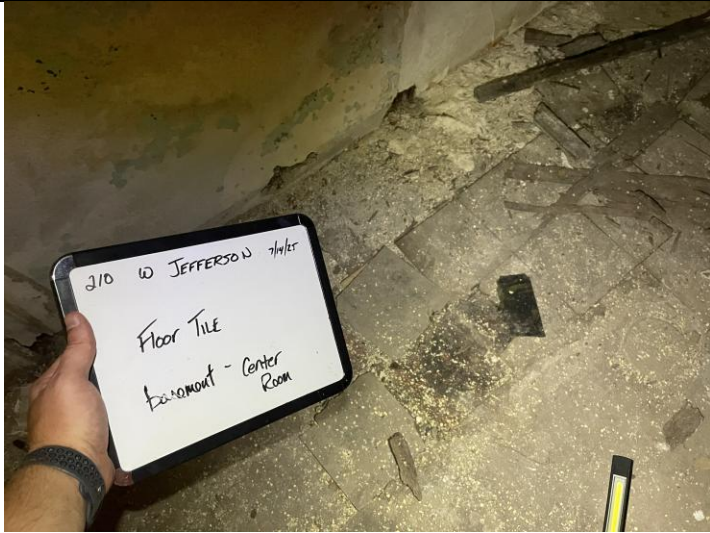


Date: 7/14/25  
Location: Basement Bathroom  
Description: Basement Bathroom

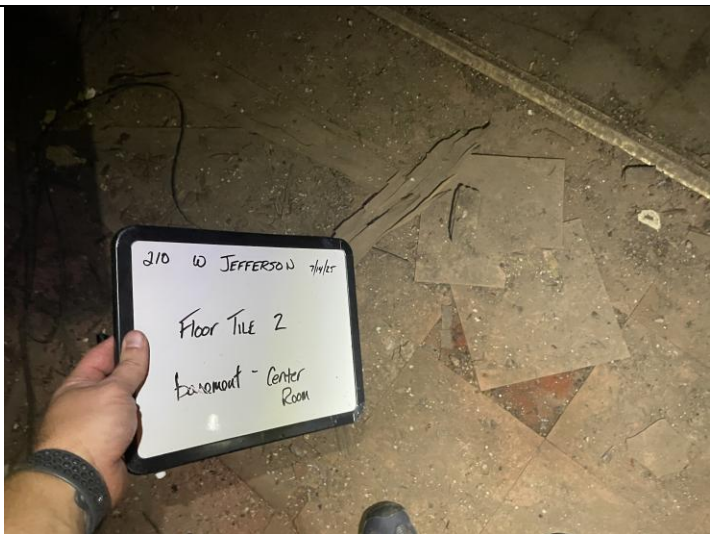


Date: 7/14/25  
Location: Basement Bathroom  
Description: Pipe Fitting





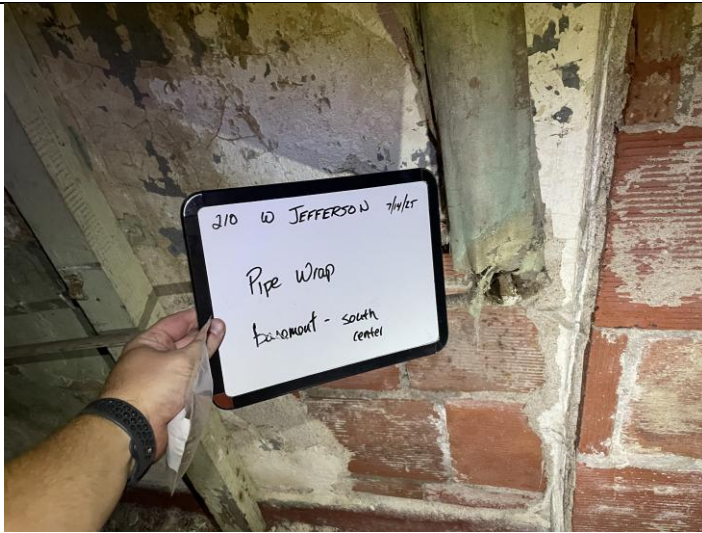


Date: 7/14/25  
Location: Basement Center Room  
Description: Floor Tile

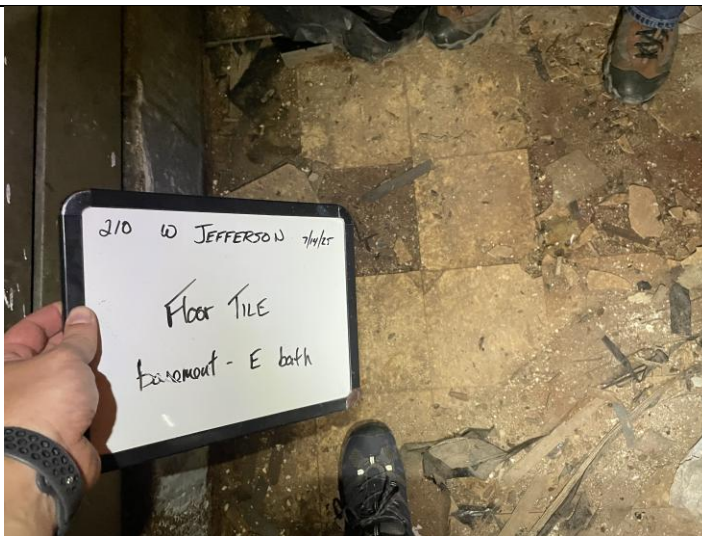


Date: 7/14/25  
Location: Basement Center Room  
Description: Floor Tile 2

	<p>Date: 7/14/25          Location: Basement          Description: Fire Door (assumed asbestos content)</p>
	<p>Date: 7/14/25          Location: Basement          Description: Fire Door Label</p>

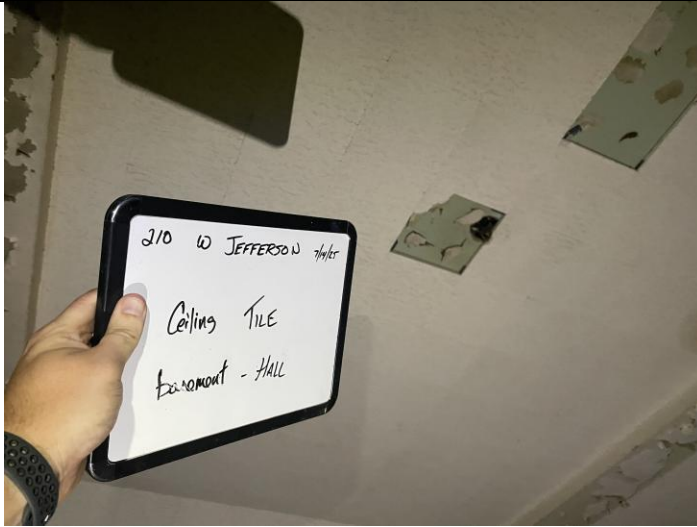


Date: 7/14/25  
 Location: Basement South Center  
 Description: Pipe Wrap

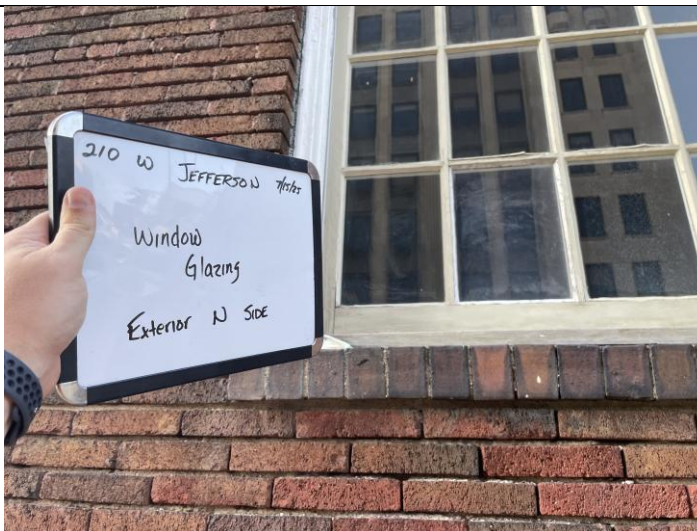


Date: 7/14/25  
 Location: Basement E Bathroom  
 Description: Floor Tile

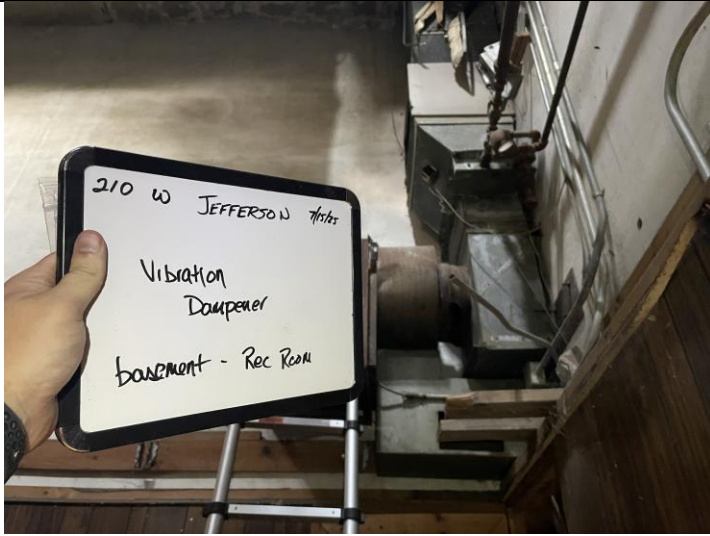




Date: 7/14/25  
Location: Basement Hall  
Description: Ceiling Tile



Date: 7/15/25  
Location: Exterior North Side  
Description: Window Glazing



Date: 7/15/25  
Location: Basement – Rec Room  
Description: Vibration Damper



Date: 7/14/25  
Location: 1<sup>st</sup> Floor East Room  
Description: Flooring





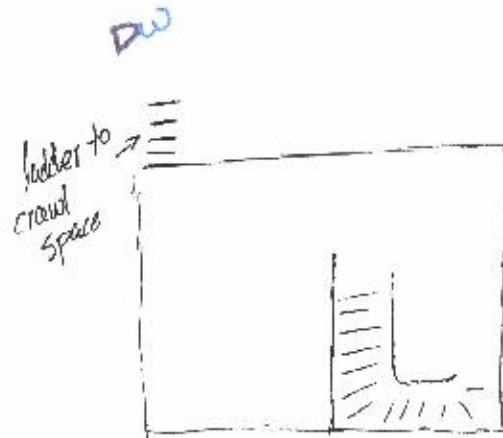




3<sup>rd</sup> Floor  
NW SIDE



3<sup>rd</sup> Floor  
SE SIDE





CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix C (Certifications)



United States Department of Commerce  
National Institute of Standards and Technology



## Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200399-0

**EMSL Analytical Inc.**  
Hillside, IL

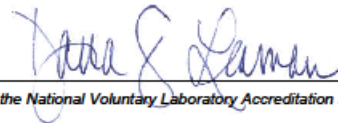
*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,  
listed on the Scope of Accreditation, for:*

### Asbestos Fiber Analysis

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

2025-04-01 through 2026-03-31

*Effective Dates*



*For the National Voluntary Laboratory Accreditation Program*



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com



**ASBESTOS  
PROFESSIONAL  
LICENSE**

ID NUMBER  
**100 - 20143**

ISSUED  
**4/8/2025**

EXPIRES  
**05/15/2026**

**CHRISTOPHER M MANUEL**  
415 N 3RD STREET  
ROCKFORD, IL 61107

Environmental Health



**ENDORSEMENTS**

INSPECTOR

**TC EXPIRES**

1/10/2026

Alteration of this license shall result in legal action  
This license issued under authority of the State of Illinois  
Department of Public Health  
This license is valid only when accompanied by a valid  
training course certificate.



**ASBESTOS  
PROFESSIONAL  
LICENSE**

ID NUMBER  
**100 - 20379**

ISSUED  
**4/16/2025**

EXPIRES  
**05/15/2026**

**ZACK W MCINTYRE**  
1615 WESTCHESTER DR  
ROCKFORD, IL 61107

Environmental Health



**ENDORSEMENTS**

INSPECTOR

**TC EXPIRES**

1/10/2026

MANAGEMENT PLANNER

2/20/2026

Alteration of this license shall result in legal action  
This license issued under authority of the State of Illinois  
Department of Public Health  
This license is valid only when accompanied by a valid  
training course certificate.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)




## CERTIFICATION

*This Certificate is given to*

**CMM ENVIRONMENTAL**

*In recognition of being Certified as a Women Business Enterprise with the  
City of Rockford*

  
John Wuich, Contract and Grant Compliance Officer

  
Thomas P. McNamara, Mayor of the City of Rockford

September 17, 2021

Expiration Date:



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com

6/16/25

City of Rockford  
425 E State St  
Rockford, IL 61104

Re: **Asbestos Sampling 223 N Main St., Rockford, IL**

Dear City of Rockford,

On June 5, 2025, CMM Environmental conducted limited asbestos sampling at the above referenced location. During the inspection it was noted that the building may contain mercury switches, light ballasts and other hazardous materials that should be addressed prior to demolition.

CMM's sampling of suspect asbestos containing materials were limited to the following:

- Floor Tile
- Ceiling Tile
- Baseboard & Mastic
- Drywall
- Plaster

The sampling of suspect materials was limited to amounts determined to be efficient to identify their asbestos content.

Table 1 – Asbestos Containing Materials

Material Description	Material Location	Asbestos Type	Material Condition	Quantity
Floor Tile	Basement	4% Chrysotile	Good	350 sf

- All quantities are estimated and any contractor should field verify quantities prior to bidding on this work.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

77 Illinois Administrative Code Chapter I Section 855.345 references sampling Miscellaneous Materials "...in a manner sufficient to determine whether material is asbestos containing materials (ACM) or not asbestos containing materials." CMM has determined this to be interpreted as the generally accepted industry standard protocol of "three (3) samples to make a negative result for asbestos and one (1) sample to make a positive result for asbestos," however sampling protocols are sometimes varied due to the limited amounts of suspect materials present.

A group letter or combination of letter and number was assigned to each Homogenous Material. This combination serves as a prefix to identify materials of similar composition, texture, color, and date of installation. Each sample was then assigned a sample number such as 01, 02, 03, etc.

All samples were identified on a signed and dated Chain-of-Custody document, which accompanied the samples to the laboratory.

To ensure both quality and objectivity, an independent laboratory was used. Laboratories are selected based on their current accreditations. The laboratory chosen participates in the National Voluntary Laboratory Accreditation Program (NVLAP) for quality control procedures (NVLAP Lab Code: 200399-0). As specified in 40 CFR Chapter I (1-1-87 edition) Part 763, Subpart F, Appendix A. Please feel free to contact the laboratory directly with any questions.

Suspected asbestos samples were analyzed using polarized light microscopy (PLM) / dispersion staining techniques in accordance with the EPA Method documents "US EPA 600/M4-82-020, 1982" & "US EPA 600/R-93/118, 1993". Detection limits for this type of analysis are approximately one percent (by volume).





CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

**FRIABLE ASBESTOS** – material can be crumbled, pulverized, or reduced to powder by hand pressure; these materials must be removed prior to demolition activities and should be addressed during renovation activities that would disturb the material, such as thermal system insulation. The following friable asbestos containing materials were identified:

- None

**CATEGORY 1 NON-FRIABLE** – material is pliable (not brittle), breaks by tearing rather than fracturing and does not easily release asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material, but do not need removal prior to demolition activities (handled as demolition material at a certified landfill) if they are in good condition and not rendered friable during handling, transporting, and disposal. However, most asbestos containing building materials on concrete substrate are removed prior to demolition activities to reduce the overall cost due to landfill charges and the fact that concrete cannot be left on site or recycled with these materials in place. Category I Non-Friable materials include resilient floor coverings, asphalt roofing materials, gaskets, and packing. The following types of Category I Non-Friable asbestos were identified:

- Floor Tile (basement)

**CATEGORY II NON-FRIABLE** – material is not pliable, breaks by fracturing rather than tearing, and does release some asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material and are removed prior to demolition activities since they are normally rendered friable during demolition and/or handling, transporting and disposal. Category II Non-Friable materials include any non-friable asbestos containing material that is not in Category I (i.e. transite siding). The following types of Category II Non-Friable asbestos were identified:

- None

**NON ASBESTOS CONTAINING MATERIALS** – The following materials were tested and found to contain *no* asbestos (or less than 1%):

- Floor Tile (entry)
- Ceiling Tile
- Baseboard & Mastic
- Drywall
- Plaster



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com

### **Recommendations / Directions / Instructions**

If a material is analyzed, by any method, and is found to contain any amount of asbestos, personnel disturbing the material should at a minimum, wear personnel protection such as NIOSH approved respirators and full body protective clothing. It is further recommended that the building and its occupants be protected against the possible exposure of airborne asbestos fibers.

If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM (USEPA Method 198.1). The owner/operator of the building may (1) elect to assume the amount to be greater than 1% and treat the material as asbestos-containing material or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result shall be used. Point counting shall be conducted only by direction of the client at the client's expense. The client assumes and retains all responsibility and authority to conduct point counting at their expense.

Contractors should use caution and be advised and directed that during renovation or demolition of a structure that concealed materials may be discovered, therefore, should suspect materials not identified in this inspection become exposed or made aware, you should cease operations that may disturb, dislodge or disrupt the material until it is sampled and analyzed for its possible asbestos content.

Samples were collected at the request of our client in a manner that should identify suspect areas as being asbestos containing or not, however, sample collection strategies may not satisfy the appropriate structure's governing agency's rules or policies. The results in this report are intended for the sole use of our client for their personnel's safety and should not be considered as an asbestos inspection. Should the client intend to submit these sampling results to the structure's governing agency, then CMM will need to extend our services to include compliance with the governing agency's policies / rules at an additional expense.

CMM Environmental recommends the use of certified and licensed asbestos personnel for **all** planned disturbance of known and suspect asbestos containing products. In accordance with IDPH, IEPA, U.S.EPA and OSHA regulations asbestos containing materials must be removed by and disposed of by a certified/licensed asbestos abatement personnel/contractor.

### **Definitions**

**Asbestos Containing Products** means, according to the U.S. EPA Method 600/R-93/116, Regulated Asbestos Containing Materials (RACM) are those materials found to contain greater than 1% asbestos per volume of bulk material sampled, by PLM. The term is not intended to include *de minimis* or inaccessible materials that do not present a risk of harm to public health and that generally would not be the subject of enforcement actions if brought to the attentions of appropriated regulatory agencies.

**Asbestos Types** are Chrysotile (white asbestos making up approximately 95% of all asbestos used in the United States), Amosite (brown asbestos making up approximately 5% of all asbestos used in the United States), Crocidolite (blue asbestos making up approximately less than 5% of all asbestos used in the United States), and rarely found in buildings are Anthophyllite, Tremolite & Actinolite.

**Friable Asbestos Material** means any material containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763 section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

**Homogeneous Material** -- an area or group of Surfacing Materials, Thermal Systems Insulation, or Miscellaneous Materials that is uniform in color & texture and has the same installation date.

**Polarized Light Microscopy (PLM)** means an optical microscopy technique for analyzing bulk samples for asbestos in which the sample is illuminated with polarized light (light which vibrates in only one plane) to distinguish between different types of asbestos fibers by their shape and unique optical properties.

**Transmission Electron Microscopy (TEM)** means a method of microscopic analysis, which utilizes an electron beam that is focused onto a thin sample. As the beam penetrates (transmits) through the sample, the difference densities produces an image on a fluorescent screen from which samples can be identified and counted. Also used for analyzing air samples for asbestos.

### **Conclusion**

The conclusions of this report are CMM's professional opinions, based solely upon visual site observations and interpretations of laboratory analyses, as described in this report. The opinions presented herein apply to the site conditions existing at the time of CMM's investigation and interpretation of current regulations pertaining to asbestos. Therefore, CMM's opinions and recommendations may not apply to future conditions that may exist at the site, which we have not had the opportunity to evaluate. It should be noted that conditions change and that materials constantly degrade. All applicable federal, state and local regulations should always be verified prior to any work that will disturb or dislodge materials confirmed, assumed or presumed to contain asbestos.

CMM's assessment was limited to observation, sampling and the analysis of suspect asbestos containing products in accessible portions of the area(s) covered by this survey. Materials in the building that are not considered building materials, are unusual or *de minimis*, or were inaccessible, due to common construction techniques, to the inspector were excluded from the inspection. As a result, additional asbestos containing building materials may be present in inaccessible areas (e.g. between walls, ceiling spaces enclosed by wallboard, interior of fire doors, below grade exterior piping and sealants, etc.) of the structure that were not observed during the survey.

This inspection report is designed to assist the client in the understanding of the regulations regarding asbestos, however, it should not be used as a substitution for obtaining and familiarizing yourself with, including the compliance of, all asbestos related regulations including, but not limited to, 40 CFR, Chapter 61, Subpart M (National Emission Standard for Asbestos) prior to the start of any renovation or demolition activity that will disturb or dislodge asbestos containing materials or suspect/assumed asbestos containing materials.

This report has been prepared for the exclusive use of the intended client, for the specific application to the defined property as addressed in this report. Any additional user of this report shall determine the suitability of the material contained herein for their intended use, and any such user assumes all risks and liability in connection therewith. No claim is made that these findings will remain applicable to future site activities and conditions. Interpretations by any such user from information contained in this report or the drawing of conclusions by any such user from information contained in this report shall be undertaken solely at the risk of said party.

At all times during the performance of the inspection, safety was a priority. Due to the emphasis on safety, there were no injuries, there was no building contamination, and there were no asbestos exposures to either CMM personnel or building occupants.



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

This report remains the sole property of CMM. The contents herein cannot be copied, scanned, duplicated, disclosed or distributed in whole or in part until complete and full payment has been received, or arraigned, for the complete services rendered, expenses incurred and/or, all legal, collection, and judgment fees afforded to CMM. either by contractual agreement or satisfactory judgments.

CMM. would like to thank you for the opportunity to be of service to you on this project. We hope that our performance has warranted the opportunity to work with you on future projects.

I hereby certify that all documents and work products prepared hereunder comply with all applicable laws and regulations, including, but not limited to, 105 ILCS 105, 225 ILCS 207 and 77 Ill. Adm. Code 855."

Signed,

A handwritten signature in dark ink, appearing to read 'Chris Manuel', is written over a horizontal line.

Chris Manuel

President

Inspector # 100-20143



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix A (Lab Report)





CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com



### EMSL Analytical, Inc.

4140 Lift Drive Hillside, IL 60182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com> / [chicagolab@emsl.com](mailto:chicagolab@emsl.com)

EMSL Order: 262505020

Customer ID: CMM75

Customer PO:

Project ID: City of Rockford

Attention: Chris Manuel  
CMM Environmental  
415 N 3rd St  
Rockford, IL 61107

Phone: (815) 218-3784

Fax:

Received Date: 06/09/2025 12:15 PM

Analysis Date: 06/13/2025

Collected Date:

Project: 223 N MAIN (City of Rockford)

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E  
Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
001 262505020-0001	PLASTER -NORTH ROOM	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
002 262505020-0002	PLASTER -NORTH ROOM	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
003 262505020-0003	PLASTER -NORTH ROOM	Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
004 262505020-0004	CT-SOUTH BATH	Brown/White Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
005 262505020-0005	CT-SOUTH BATH	Gray/White Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
006 262505020-0006	CT-SOUTH BATH	Brown/White Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
007 262505020-0007	CT-SE OFFICE	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
008 262505020-0008	CT-SE OFFICE	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
009 262505020-0009	CT-SE OFFICE	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
010 262505020-0010	DW-SOUTH RM	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
011-Drywall 262505020-0011	DW-NORTH RM	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
011-Joint Compound 262505020-0011A	DW-NORTH RM	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
012-Drywall 262505020-0012	DW-NORTH RM	Brown/White Non-Fibrous Homogeneous	10% Cellulose	90% Non-fibrous (Other)	None Detected
012-Joint Compound 262505020-0012A	DW-NORTH RM	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
013-Floor Tile 262505020-0013	FT-FRONT ENTRY	Yellow/Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
013-Mastic 262505020-0013A	FT-FRONT ENTRY	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 06/13/2025 13:15:52



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com



# **EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 80182  
Tel/Fax: (773) 313-0099 / (773) 313-0139  
<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262505020  
Customer ID: CMM75  
Customer PO:  
Project ID: City of Rockford

## **Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
014-Floor Tile 262505020-0014	FT-NORTH ROOM	Yellow/Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
014-Mastic 262505020-0014A	FT-NORTH ROOM	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
015-Floor Tile 262505020-0015	FT-NORTH ROOM	Yellow/Beige Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
015-Mastic 262505020-0015A	FT-NORTH ROOM	Clear Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
016-Baseboard 262505020-0016	BASEBOARD & GLUE -BATHROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
016-Glue 262505020-0016A	BASEBOARD & GLUE -BATHROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
017-Baseboard 262505020-0017	BASEBOARD & GLUE -BATHROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
017-Glue 262505020-0017A	BASEBOARD & GLUE -BATHROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
018-Baseboard 262505020-0018	BASEBOARD & GLUE -BATHROOM	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
018-Glue 262505020-0018A	BASEBOARD & GLUE -BATHROOM	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
019 262505020-0019	CT-NORTH ROOM	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
020 262505020-0020	CT-NORTH ROOM	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
021 262505020-0021	CT-NORTH ROOM	Gray/White Fibrous Homogeneous	30% Cellulose 30% Min. Wool	30% Perlite 10% Non-fibrous (Other)	None Detected
022-Floor Tile 262505020-0022	FT-BASEMENT	Gray/Tan Non-Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
022-Mastic 262505020-0022A	FT-BASEMENT	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
023-Floor Tile 262505020-0023	FT-BASEMENT				Positive Stop (Not Analyzed)
023-Mastic 262505020-0023A	FT-BASEMENT	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
024-Floor Tile 262505020-0024	FT-BASEMENT				Positive Stop (Not Analyzed)
024-Mastic 262505020-0024A	FT-BASEMENT	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 06/13/2025 13:15:52



CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com



**EMSL Analytical, Inc.**

4140 Lift Drive Hillside, IL 60182

Tel/Fax: (773) 313-0099 / (773) 313-0139

<http://www.EMSL.com> / [chicago@emsl.com](mailto:chicago@emsl.com)

EMSL Order: 262505020

Customer ID: CMM75

Customer PO:

Project ID: City of Rockford

Analyst(s)

Mazen Elkhadib (20)

Shamya Pugh (7)

James Hahn, Laboratory Manager  
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 800/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-flammable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

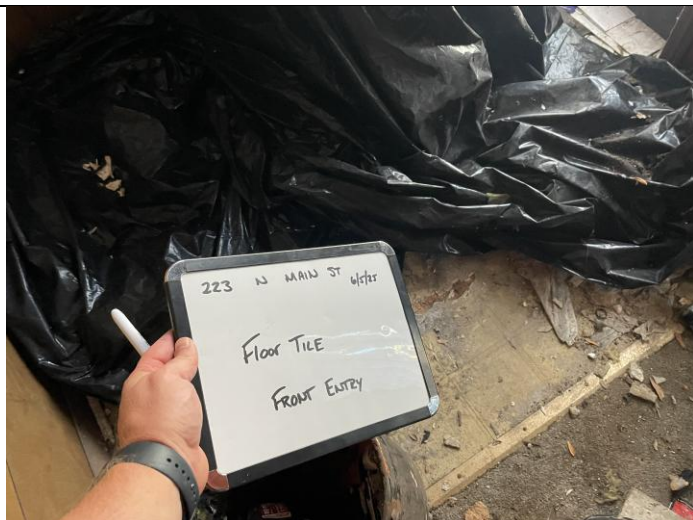
Samples analyzed by EMSL Analytical, Inc. Hillside, IL NVLAP Lab Code 200399-0

Initial report from: 05/13/2025 13:15:52



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix B (Pictures)



Date: 6/5/25  
Location: Front Entry  
Description: Floor Tile



Date: 6/5/25  
Location: North Room  
Description: Ceiling Tile

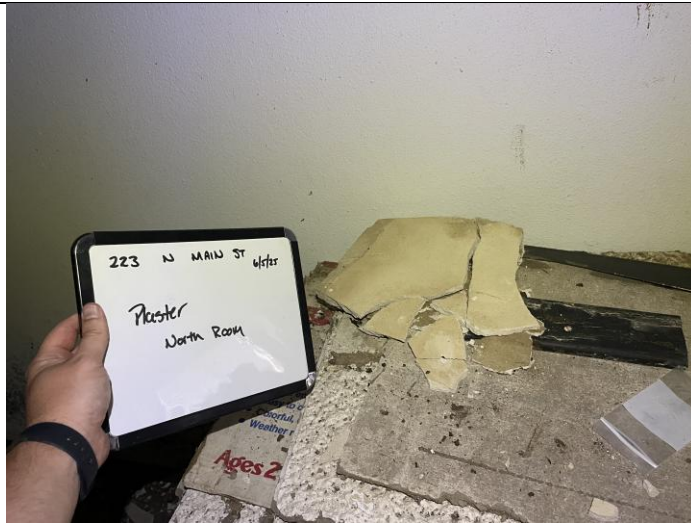




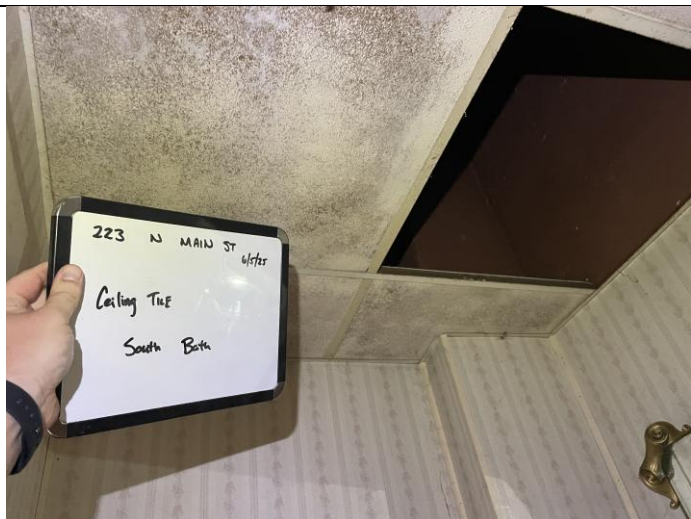
Date: 6/5/25  
Location: Bathroom  
Description: Baseboard & Mastic



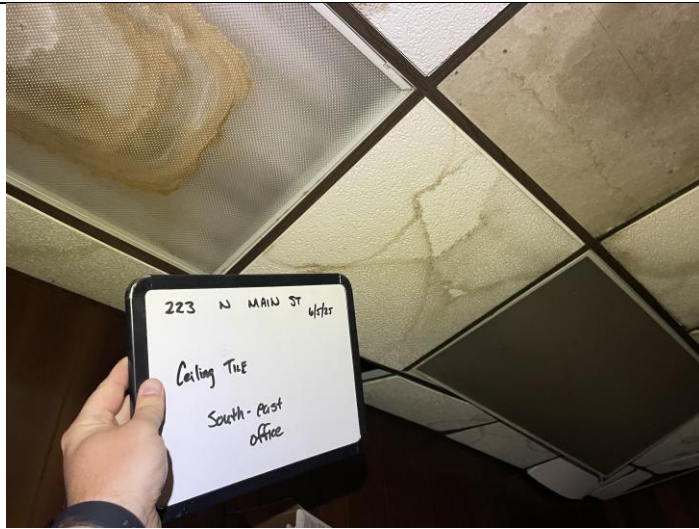
Date: 6/5/25  
Location: Drywall  
Description: North Room



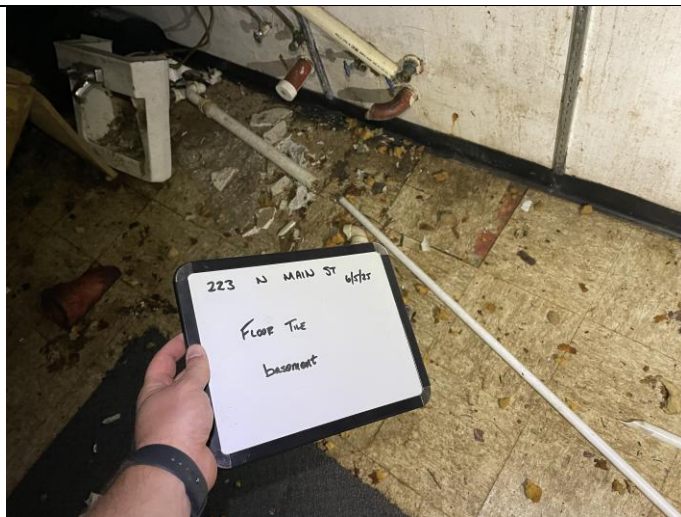
Date: 6/5/25  
Location: North Room  
Description: Plaster



Date: 6/5/25  
Location: South Bathroom  
Description: Ceiling Tile



Date: 6/5/25  
 Location: Southeast Office  
 Description: Ceiling Tile



Date: 6/5/25  
 Location: Basement  
 Description: Floor Tile



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)

## Appendix C (Certifications)



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
www.cmmenvironmental.com

United States Department of Commerce  
National Institute of Standards and Technology



## Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200399-0

**EMSL Analytical Inc.**  
Hillside, IL

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

### **Asbestos Fiber Analysis**

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

2025-04-01 through 2026-03-31  
Effective Dates



For the National Voluntary Laboratory Accreditation Program





CMM Environmental

415 N 3<sup>rd</sup> Street

Rockford, IL 61107

Phone: (815) 968-1266 Fax: (877) 314-4319

www.cmmenvironmental.com



**ASBESTOS  
PROFESSIONAL  
LICENSE**

ID NUMBER  
**100 - 20143**

ISSUED  
**4/8/2025**

EXPIRES  
**05/15/2026**

**CHRISTOPHER M MANUEL**  
415 N 3RD STREET  
ROCKFORD, IL 61107

Environmental Health



**ENDORSEMENTS**

INSPECTOR

**TC EXPIRES**

1/10/2026

Alteration of this license shall result in legal action  
This license issued under authority of the State of Illinois  
Department of Public Health  
This license is valid only when accompanied by a valid  
training course certificate.



**ASBESTOS  
PROFESSIONAL  
LICENSE**

ID NUMBER  
**100 - 20379**

ISSUED  
**4/16/2025**

EXPIRES  
**05/15/2026**

**ZACK W MCINTYRE**  
1615 WESTCHESTER DR  
ROCKFORD, IL 61107

Environmental Health



**ENDORSEMENTS**

INSPECTOR

**TC EXPIRES**

1/10/2026

MANAGEMENT PLANNER

2/20/2026

Alteration of this license shall result in legal action  
This license issued under authority of the State of Illinois  
Department of Public Health  
This license is valid only when accompanied by a valid  
training course certificate.



CMM Environmental  
415 N 3<sup>rd</sup> Street  
Rockford, IL 61107  
Phone: (815) 968-1266 Fax: (877) 314-4319  
[www.cmmenvironmental.com](http://www.cmmenvironmental.com)



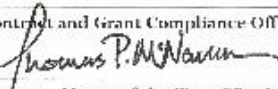
## CERTIFICATION

*This Certificate is given to*

**CMM ENVIRONMENTAL**

*In recognition of being Certified as a Women Business Enterprise with the  
City of Rockford*

  
John Wuich, Contract and Grant Compliance Officer

  
Thomas P. McNamara, Mayor of the City of Rockford

September 17, 2021

Expiration Date