

COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

SITE-SPECIFIC QUALITY ASSURANCE PROJECT PLAN (SSQAPP)

Project:

City of Hamilton Former Nursing Home
400 W. Grogan Street
Hamilton, Texas 76531

EPA Brownfields Cleanup Grant No.: 02F74101

Prepared By:

RNDI Companies, Inc.
311 E Interstate 30
Rockwall, TX 75087

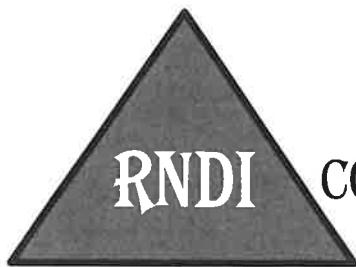
Version: 1.0

Date: April 30, 2026

Period of Applicability: Duration of abatement and verification sampling activities

PREPARED BY:





COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

This Site-Specific Quality Assurance Project Plan (SSQAPP) has been prepared in accordance with EPA CIO 2105-S-02.1 and applies to air monitoring activities associated with interior asbestos abatement conducted under the referenced Brownfields Cleanup Grant.

By signing below, the undersigned certify that this SSQAPP has been reviewed and approved for implementation.

Prepared By:

Shane Davis

Project Manager

RNDI Companies, Inc.

Signature: Shane Davis

Date: April 30, 2026

Quality Assurance Manager (QAM):

Caden Malone

QA Officer

RNDI Companies, Inc.

Signature: Caden Malone

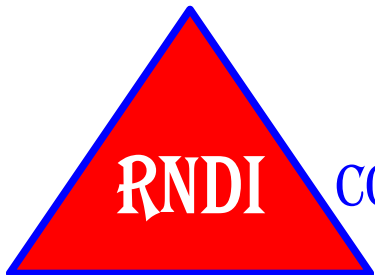
Date: April 30, 2026

City of Hamilton Representative:

Name: Stacey Morris

Signature: Stacey Morris

Date: 4/30/26



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

EPA Project Officer:

Name: _____

Signature: _____

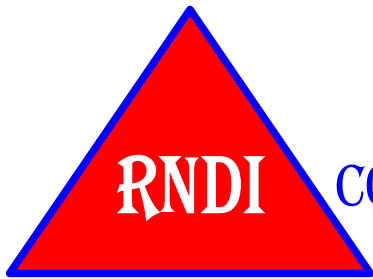
Date: _____

EPA Technical Reviewer (if required):

Name: _____

Signature: _____

Date: _____

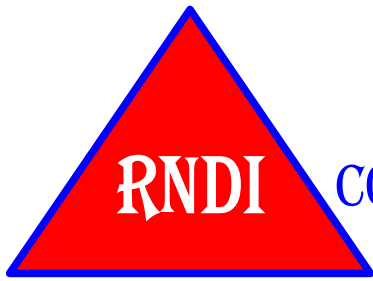


COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

Table of Contents

- Cover Page
- Table of Contents
- Group A - Project Management 5-13
- Group B - Data Generation and Acquisition..... 14-15
- Group C - Assessment and Oversight 16
- Group D - Data Review, Validation, and Usability 16-17
- Appendix A - Licensing Documentation18-20
- Appendix B - Sample Documentation21-23



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

A1 – PROJECT PURPOSE, PROBLEM DEFINITION, BACKGROUND

This SSQAPP governs environmental data collection associated with interior asbestos abatement at the former nursing home facility in Hamilton, Texas under EPA Brownfields Cleanup Grant No. 02F74101.

Asbestos-containing materials (ACM) have been identified throughout interior areas. Abatement activities may disturb ACM and generate airborne fibers if not properly controlled.

RNDI Companies, Inc. will perform asbestos abatement activities at the site. All air monitoring and clearance sampling will be performed by an independent third-party industrial hygiene firm to maintain data integrity and quality assurance independence.

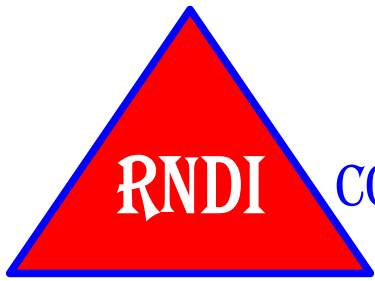
Air monitoring is required to:

- Verify containment effectiveness
- Protect adjacent residential receptors
- Support regulatory compliance
- Document attainment of clearance criteria
- Provide defensible environmental data to EPA

No soil sampling or groundwater sampling is included in this project.

Regulatory Framework:

- OSHA 29 CFR 1926.1101 (Asbestos Standard for Construction)
- 29 CFR 1910.134 (Respiratory Protection)
- Texas Department of State Health Services Asbestos Regulations



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

- EPA Brownfields Grant Conditions
- 2 CFR 200 (Uniform Administrative Requirements)

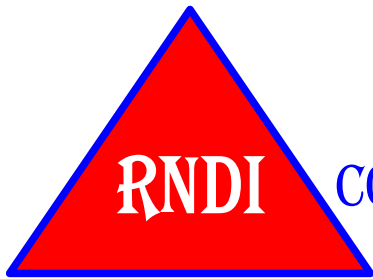
A2 – PROJECT TASK DESCRIPTION

Tasks covered by this SSQAPP include:

1. Background air sampling prior to abatement
2. Perimeter air monitoring during active abatement
3. Clearance air sampling following abatement
4. Laboratory analysis of collected air samples
5. Data validation and QA review
6. Reporting of findings

Air monitoring will be conducted by an independent third-party industrial hygiene firm to ensure data integrity.

Each containment area will be treated as a separate decision unit.



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

A3 – INFORMATION/DATA QUALITY OBJECTIVES (DQOs)

Decision Statements

Environmental data will support decisions regarding:

- Effectiveness of engineering controls
- Need for corrective action
- Final clearance determination

Decision Rules

- If perimeter air monitoring exceeds background levels, work will pause and corrective actions will be implemented.
- Clearance will be based on PCM results ≤ 0.01 fibers per cubic centimeter (f/cc).
- TEM analysis (NIOSH 7402) will be triggered when PCM results exceed 0.01 f/cc, when results are inconsistent with expected conditions, or upon request by the EPA or QAM.

Data Quality Indicators (PARCCS)

Precision:

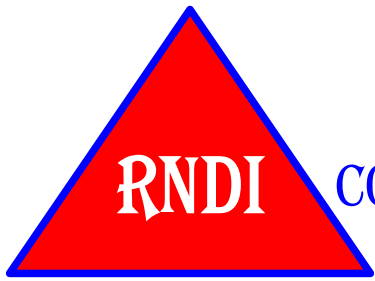
Field duplicates where appropriate; laboratory QC review.

Accuracy:

Lab calibration and method adherence per NIOSH 7400/7402.

Representativeness:

Sampling locations selected to represent breathing zones and containment perimeter.



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

Comparability:

All samples analyzed using consistent NIOSH methods.

Completeness:

Minimum 90% valid data return required.

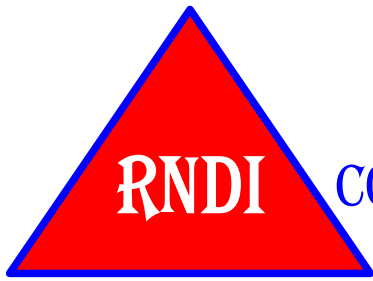
Sensitivity:

Detection limits adequate to evaluate clearance criterion of ≤ 0.01 f/cc.

A4 – DISTRIBUTION LIST

Approved QAPP will be distributed to:

- Project Manager
- QAM
- Site Supervisor
- Health & Safety Officer
- Independent IH Firm
- City of Hamilton
- EPA Project Officer



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

A5 – PROJECT ORGANIZATION

Project Manager – Shane Davis

Responsible for project execution and regulatory compliance.

Project QAM – Caden Malone

Independent oversight of QA implementation and data review.

Site Supervisor – Steward Tilley

Responsible for daily abatement supervision.

Health & Safety Officer – Chris Cross

Responsible for HASP implementation.

Independent Air Monitoring Firm – Eco Ipsum Consulere, PLLC

Texas-licensed Asbestos Consultant Agency (License No. 100511). Responsible for performing all air monitoring and clearance sampling activities in accordance with the SSQAPP

Analytical Laboratory – Cates Laboratory (Dallas, Texas)

NVLAP-accredited laboratory (Lab Code: 200569-0). Responsible for analysis of air samples using NIOSH Method 7400 (PCM) and NIOSH Method 7402 (TEM), as required.

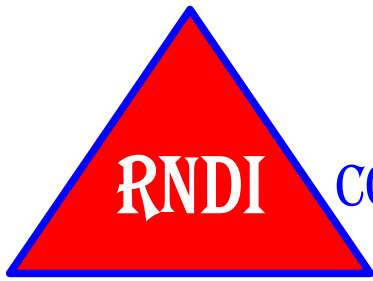
Backup Laboratory - Moody Labs, LLC (Farmers Branch, Texas)

NVLAP-accredited laboratory (Lab Code: 102056-0). Responsible for analysis of air samples using NIOSH Method 7400 (PCM) and NIOSH Method 7402 (TEM), as required should Cates Laboratory not be available/used.

A6 – QAM INDEPENDENCE

The Project QAM operates independently of field operations and does not direct abatement activities. The QAM has authority to:

- Review data
- Identify non-conformances



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

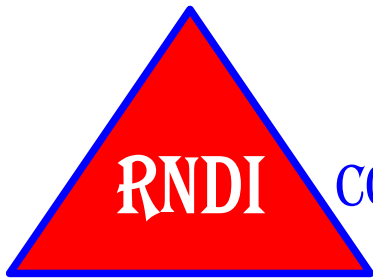
- Recommend corrective actions
- Communicate directly with senior management regarding QA issues

A7 – ORGANIZATIONAL STRUCTURE AND COMMUNICATION

Project communication and reporting will follow a defined chain of responsibility to ensure coordination between field operations, air monitoring, data management, and regulatory reporting.

- The Project Manager is responsible for overall project coordination and communication with the City of Hamilton and EPA.
- The Site Supervisor manages daily field operations and coordinates directly with the Project Manager.
- The Independent Air Monitoring Firm (Eco Ipsum Consulere, PLLC) operates independently of abatement activities and reports monitoring results to the Project Manager and QAM.
- The Analytical Laboratory (Cates Laboratory) provides analytical results to the Independent Air Monitoring Firm and/or Project Manager.
- The Project QAM independently reviews all data, QA/QC documentation, and reporting prior to final submission.

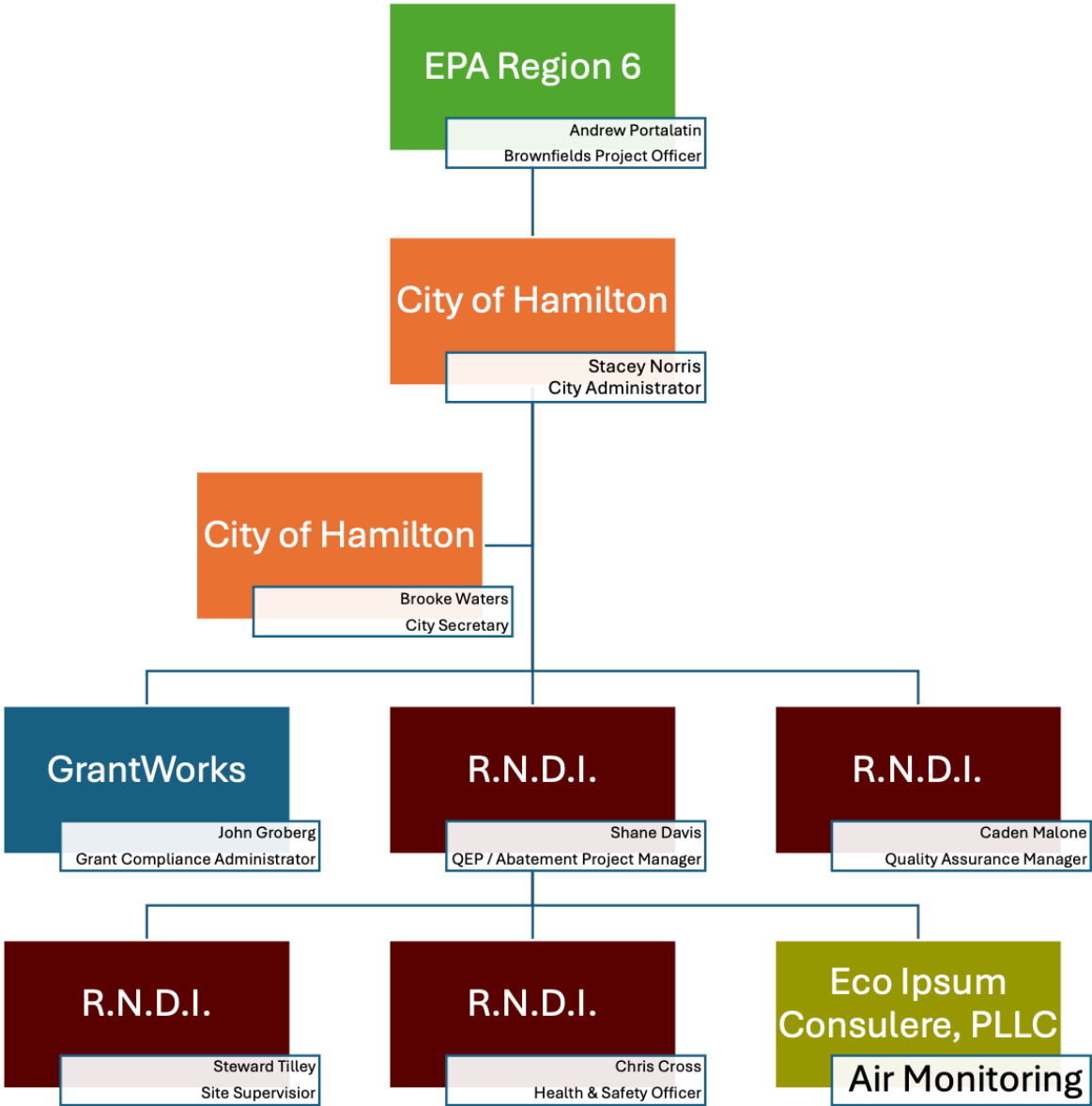
All communication related to environmental data, QA/QC, and compliance will be documented and maintained as part of the project record.

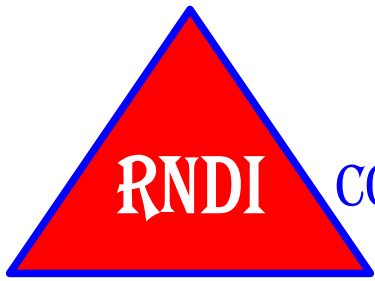


COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

City of Hamilton, TX
Brownfields Cleanup Project Organizational Chart





COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

A8 – PERSONNEL TRAINING & CERTIFICATION

All asbestos abatement personnel:

- Texas Licensed Asbestos Supervisor or Worker
- Annual refresher training
- Respirator fit testing (annual)
- Medical surveillance per OSHA 1926.1101

Air Monitoring Firm:

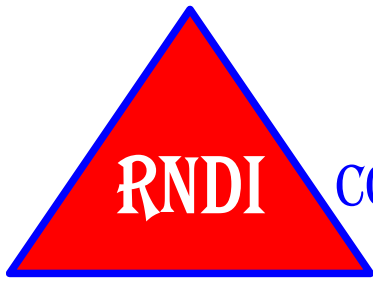
Eco Ipsum Consulere, PLLC will perform independent air monitoring and clearance sampling activities for the project. Eco Ipsum Consulere, PLLC is a Texas-licensed Asbestos Consultant Agency (License No. 100511), with a current license status in good standing.

The firm operates independently of abatement operations to maintain data integrity and quality assurance independence. All monitoring will be conducted by appropriately licensed personnel in accordance with Texas Department of State Health Services (DSHS) requirements.

Analytical Laboratory:

Air samples will be analyzed by Cates Laboratory, located in Dallas, Texas, an NVLAP-accredited laboratory (Lab Code: 200569-0) and Texas-licensed asbestos laboratory.

Sample analysis will be conducted in accordance with:



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

- NIOSH Method 7400 (PCM)
- NIOSH Method 7402 (TEM), as required

The laboratory maintains current accreditation and participates in applicable proficiency testing programs.

- Training records available upon request.

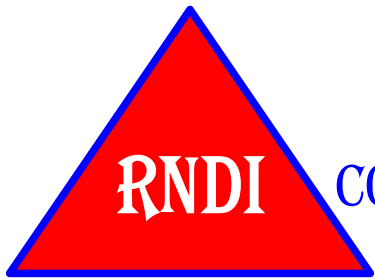
A9 – DOCUMENTS & RECORDS

Maintained records:

- Field logs
- Chain-of-custody forms
- Calibration records
- Laboratory reports
- QA review forms
- Training documentation

Retention: Minimum 5 years or per grant agreement.

This SSQAPP will be reviewed annually and updated as necessary to maintain compliance with EPA requirements. The period of applicability shall not exceed five (5) years from the date of approval.



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

GROUP B – DATA GENERATION AND ACQUISITION

B1 – ENVIRONMENTAL OPERATIONS

Air monitoring operations only.

B2 – SAMPLING METHODS

Primary: NIOSH 7400 (PCM)

Confirmatory: NIOSH 7402 (TEM, if triggered)

Aggressive clearance sampling performed in accordance with applicable regulatory requirements, as appropriate.

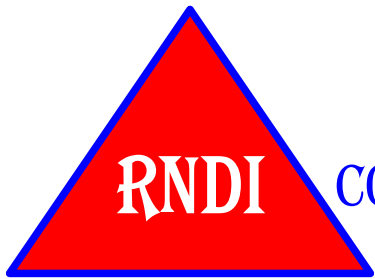
B3 – SAMPLE HANDLING & CUSTODY

- Unique sample ID numbers
- Chain-of-custody documentation
- Secure transport to accredited lab

B4 – QUALITY CONTROL

Quality control procedures will be implemented to ensure data quality objectives (DQOs) are met in accordance with EPA QAPP requirements.

- **Field Blanks:** Minimum of one (1) field blank per 20 samples collected, or one per sampling day, whichever is greater.



COMPANIES, INC.

311 East I 30

Rockwall, Texas 75087

Phone: (214) 876-3069

Fax: (713) 513-5285

Diana@RNDICompanies.com

- **Field Duplicates:** Collected at a rate of 10% of total samples, minimum one per sampling event.
- **Calibration Checks:** Sampling pumps will be calibrated before and after each sampling event using a primary standard calibrator with NIST-traceable certification.
- **Laboratory Quality Control:** Laboratory will perform internal QC including blanks, spikes, and duplicates per NIOSH 7400/7402 requirements.
- **Acceptance Criteria:**
 - Duplicate results must be within $\pm 25\%$ relative percent difference (RPD)
 - Calibration must be within $\pm 5\%$ of target flow rate
- **Corrective Actions:**
 - If QC criteria are not met, data will be flagged and evaluated by the QAM
 - Resampling may be required
 - Work may be paused if data quality is compromised

B5 – INSTRUMENT CALIBRATION

Sampling pumps will be calibrated before and after each use using a primary standard calibrator with current NIST-traceable certification. Calibration records will be maintained as part of project documentation. Equipment will be maintained in accordance with manufacturer recommendations, and calibration devices will be checked annually

B6 – INSPECTION OF SUPPLIES

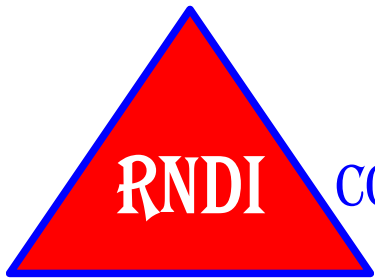
Inspection of sampling media and equipment prior to use.

B7 – DATA MANAGEMENT

Data pathway:

Field → Lab → QAM Review → Report → EPA

Electronic records backed up securely.



COMPANIES, INC.

*311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com*

GROUP C – ASSESSMENT & OVERSIGHT

C1 – ASSESSMENTS

Assessments will include internal QA reviews conducted weekly during active sampling activities. The QAM is responsible for assessment oversight. Any deficiencies identified will be documented, and corrective actions will be implemented within 48 hours. Assessment records will be maintained as part of the project file.

C2 – REPORTING

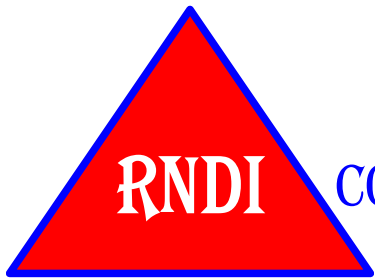
Clearance reports submitted upon completion.
Non-conformances documented.

GROUP D – DATA VALIDATION & USABILITY

D1 – DATA VALIDATION

QAM reviews:

- Calibration logs
- COC forms
- QC sample results
- Lab QA documentation



COMPANIES, INC.

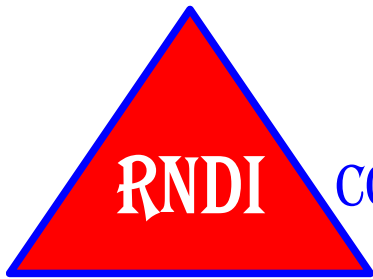
311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

D2 - USABILITY DETERMINATION

Data usable if:

- QC criteria satisfied
- Detection limits sufficient
- Decision rules met

If not, corrective action and resampling is required.



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

APPENDIX A – LICENSING DOCUMENTATION

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200569-0

Cates Laboratories, Inc.
Dallas, TX

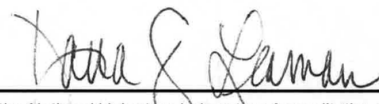
*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
listed on the Scope of Accreditation, for:*

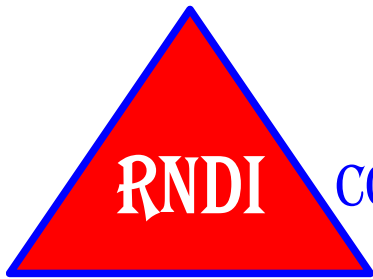
Asbestos Fiber Analysis

*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 Communique on ISO/IEC 17025).*

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




For the National Voluntary Laboratory Accreditation Program



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

United States Department of Commerce
National Institute of Standards and Technology



Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 102056-0

Moody Labs, LLC
Farmers Branch, TX

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

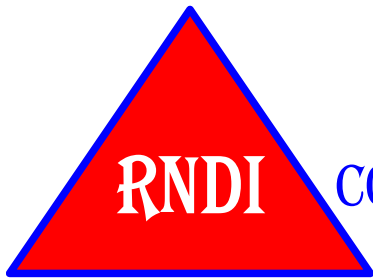
Asbestos Fiber Analysis

*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 Communique on ISO/IEC 17025).*

2025-07-01 through 2026-06-30
Effective Dates



For the National Voluntary Laboratory Accreditation Program



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

License Number: 100511

Name:	ECO IPSUM CONSULERE PLLC
License Type:	Asbestos Consultant Agency
License Status:	Current
Expiry Date:	06/15/2026
Effective Rank Date:	06/16/2014

Addresses

Main Address

Address
605 N ALAMO RD
ROCKWALL , TX
ROCKWALL
75087
US

Phone Number:
9724394910

Physical Addr

Address
605 N. ALAMO RD
ROCKWALL , TX
COLLIN
75087
US

Phone Number:
9724394910

Mailing Address

Address
ECO IPSUM CONSULERE PLLC
ROWLETT , TX
DALLAS
75088-9320
US

Phone Number:
9724394910

Asbts Consult. Agency Designated Person

Licensee's Role:	Asbestos Consultant Agency
Related Party Role:	Asbestos Individual Consultant

Related Party Name

License

Address

INZILLO, SALVATORE	Asbestos Individual Consultant #105768		ROWLETT , TX
	Status:	Current	ROCKWALL
	Expiration Date:	09/12/2027	75088
			US



311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
na@RNDICompanies.com

CL Project No. _____
(Lab Only)

AF72017-10 - issued 12/12/2022 Walk-In ☐ D-Drop ☐ F-Drop ☐ FedEx ☐ UPS ☐ Lonestar ☐ USPS ☐

of



COMPANIES, INC.

Diana@RNDICompanies.com



CHAIN OF CUSTODY

Additional Sample Page

CL Project No. _____
(Lab Only)

Project Name: _____ Project No.: _____

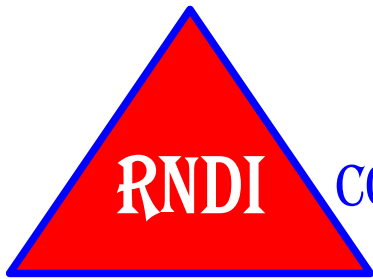
[illegible]

AF72017-10 - issued 12/12/2022

1339 Motor Circle, Dallas, TX 75207 * (214) 920-5006, Fax 1-972-767-0167

NVLAP Lab Code 200569-0, TDSHS-Asbestos: 30-0287, TDLR-Mold: LAB1034, AZ Lab Cert. AZ0948

_____ of _____



COMPANIES, INC.

311 East I 30
Rockwall, Texas 75087
Phone: (214) 876-3069
Fax: (713) 513-5285
Diana@RNDICompanies.com

HAMILTON BROWNFIELDS PROJECT

Sample ID: PER-01

Sample Type: ☒ Background ☐ Perimeter ☐ Clearance

Date Collected: 04/24/2026

Time Collected: 10:15 AM

Sampler Initials: SD

DO NOT REMOVE THIS LABEL