CHOICE ENVIRONMENTAL
1811 Hale Hollow Road, Bridgewater Corners, VT 05035

February 2, 2026

Cornish Community Initiative
PO Box 123
Cornish Flat, NH 03746

Subject: Original Floor Tile, Main Room, Former Cornish General Store located at 226 NH Route 120, Cornish, NH

Dear Community Initiative,

We have been asked to discuss the method of encapsulation of resilient flooring, in this case the red and black floor tiles that contain approximately 6% asbestos within the matrix of the tile and are located under a portion of the wood floor at the former general store. On October 20, 2025, Cliff Harper, a licensed asbestos inspector, sampled floor tile at the former Cornish General Store located at 226 NH Route 120 in Cornish NH for the purpose of identifying additional potential asbestos materials from the main room of the structure.

REGULATORY OVERVIEW

Asbestos

The United States Environmental Protection Agency (USEPA) regulation 40 CFR 61, Subpart M, NESHAP regulates asbestos fiber emissions during renovation or demolition activities and asbestos waste disposal practices. It also requires the identification and classification of existing building materials prior to demolition or renovation activities. Under NESHAP, asbestos-containing building materials are classified as either friable, Category I non-friable or Category II non-friable ACM. Friable materials are those that, when dry, may crumble, pulverized, or reduced to powder by hand pressure. Category I non-friable ACM includes packings, gaskets, resilient floor coverings and asphalt roofing products containing more than 1% asbestos. Category II non-friable ACM are any materials other than Category I materials that contain more than 1% asbestos. Friable ACM, along with Category I and Category II non-friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting, or abrading and which could be crushed or pulverized during anticipated renovation or demolition activities are considered regulated ACM (RACM). In the State of NH, asbestos activities are regulated by the Department of Environmental Services (NHDES). Their regulations require that

any asbestos-related activity conducted in NH be performed by personnel licensed by the EPA under 40 CFR 763.

The red and black floor tile samples from the “library” building were analyzed by me at Asbestos Identification Analytical Laboratories, who are NH State-Certified and qualified to perform Polarized Light Microscopy (PLM) analyses on bulk sample material. Asbestos containing material (ACM) sample results by PLM and additional analyses were positive for the floor tile and the related mastic (glue on the bottom of the tile). The floor tile in this building is considered a Class II, non-friable ACM material and is located under a portion of the main room floor.

Why was the floor tile uncovered?

The floor tile had been uncovered due to a construction design that required the installation of a subsurface conduit. A small portion of wood floor and subfloor had to be removed to complete the project. This same wood floor has covered the original floor tile for decades. The floor tile that was exposed during the subsurface conduit work was properly removed and disposed of under a permit filed with the NHDES. Air testing was completed by a third party after the floor tile was removed to show that no fibers had been released during the removal procedure. The tile flooring was then covered by a temporary subfloor floor until a new floor was installed.

The question that has been asked is “does this configuration of flooring pose an unreasonable risk to occupants and visitors to the building”. The simple answer is “no”. The reason for this statement is due to a procedure that many buildings use for floor tile that tests positive for asbestos. Under NHDES asbestos rules, the floor tile can either be fully removed under a NHDES permit, or the floor tile can be encapsulated. Encapsulation has been the case at the general store over the past decade. The flooring is inaccessible consequently, it cannot be disturbed and no release of fiber is possible.

I am the asbestos manager for many of the high school and grammar schools in Central Vermont. Many of the schools have uncovered asbestos containing floor tile throughout their schools, on the order of thousands of square feet of floor tile throughout their corridors and offices. Hundreds of students walk on this floor every day, every week. The floor tile is not encapsulated. It is exposed to foot traffic although it is a non-friable type of asbestos material (like the general store floor) and the risk is negligible to the occupants unless the floor tile is in poor condition and has become friable or will be subjected to drilling, sanding, grinding, cutting, or abrading and which could crush or pulverize the floor tile

The general store tile is covered by a subfloor with wood flooring that totally encapsulates the subject floor tile and renders it inaccessible. The builder has indicated the flooring "sandwich" is designed with the following components:

- New finish floor (either carpet or tile)
- New adhesive for new finish floor
- New leveling products (either plywood or sika-type liquid applied)
- Existing pine floor
- Existing subfloor
- Existing sleeper system – wood framing above the floor tile
- Existing floor tile and mastic (non-friable asbestos contained in floor tiles)
- Existing concrete slab

One can see that the floor tile is fully encapsulated and is a safe and EPA-authorized alternative to removing the entire main floor. This procedure is a safe alternative that is employed at many facilities in New Hampshire. A risk can be defined as a hazard times the exposure. If the hazard or the exposure is removed from the equation, the product equals zero. In this case the exposure has been removed from the equation. This is the reason why the encapsulation of the floor is a safe alternative.

We appreciate the opportunity to offer our services.

Respectfully submitted,
Choice Environmental

Cliff Harper, PG
Principal

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CLIFF HARPER

BIOGRAPHICAL



CLIFF HARPER, PROFESSIONAL GEOLOGIST

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EDUCATION

BS, Geology, University of Massachusetts (BSC)
Graduate Studies, Environmental Engineering, Univ. of Florida
Asbestos Licensed and Mold Certifications

PROFESSIONAL EXPERIENCE

Cliff is currently the Principal Hydrogeologist of **CHOICE ENVIRONMENTAL**. He has over 35 years of experience in the environmental industry and has managed environmental site assessment and remediation projects throughout the United States and overseas. With the recent sale of Harper Environmental Associates, Cliff is currently focusing his expertise on asbestos, mold and soil/groundwater contamination projects. Cliff also invented and patented the Blackwater Alert, a wireless sewer back up alarm currently sold online and through plumbing warehouses.

- Prior to founding Choice Environmental and Harper Environmental, Cliff was employed by Groundwater Technology, Inc. for 12 years, as VP and Eastern Operations Manager of the National Industry Division. His responsibilities included managing a profit and loss center with $25 million revenue.

- As the founder of Harper Environmental (1996-2021), Cliff directed soil and groundwater investigations and remediation; indoor air investigations (mold, asbestos, VOCs); and hazardous waste management throughout New England.

- Project Director of several public-school Asbestos Management Plans under AHERA regulations

- Completion of hundreds of asbestos surveys prior to demolition or renovation of commercial and privately owned structures.