Limited Asbestos Report

Faras Elementary School
401 West Fir Avenue
Pirtleville, Arizona 85626

Prepared for:

Douglas Unified School District
1132 East 12th Street
Douglas, Arizona 85607

Prepared by:

RedTree CONSULTING, LLC.
7845 East Redfield Road Suite 100
Scottsdale, Arizona 85260
Ph 602.989.2433

October 31, 2017

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SECTION 1

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LIMITATIONS

LIMITATIONS

The conclusions and results contained herein are based solely on the information presented in this report and are for the sole use of the Client exclusively and are subject to the terms and conditions of "The Contract". No other person or entity may rely on this report without the prior written consent of RedTree Consulting, LLC (RTC).

The sampling, testing, and observations described in the report represent conditions only at the specified times and locations. Additional materials or information which were hidden, undiscovered, inaccessible, or are not a part of the finding presented herein, would result in the modification of the conclusions and recommendations made herein. Any response action guidelines are based solely on the findings contained herein. The response action guidelines are presented as a courtesy and are not to be considered a complete or detailed set of specifications. RTC performed these services using the degree of care and skill ordinarily exercised under similar conditions by reputable members of the profession practicing in the same or similar circumstances.

Please note, with regard to laboratory analysis of suspect bulk asbestos-containing materials: The Environmental Protection Agency (EPA) Method 600/R-93-116, Polarized Light Microscopy (PLM) is used for the testing of bulk building materials for asbestos by performing a visual estimation. This method is the most widely used method for estimating asbestos in bulk building materials and works well for most sample types. However, it might require a more detailed method such as point counting for accurate estimation of asbestos in samples with low asbestos concentration. This method is also not applicable for samples containing large amounts of fine fibers below the resolution of the PLM (<0.3 microns). Typically, the asbestos fibers present in non-friable organically bound (NOB) materials are often less than 0.1 microns in diameter and therefore may cause the PLM method to yield low estimates or even false negative results.

RTC suggests that Transmission Electron Microscopy (TEM) Chatfield Semi-Quantitative EPA Method 600/R-93-116 be used to confirm all negative results of NOB materials. This method is particularly useful to reduce the possibility of false negatives in NOBs and to provide additional quantitative data for samples which contain low levels of asbestos. The TEM method is available at additional cost and is done only at the client's request.

RTC's scope of service for this report did not include the inspection for, or identification of fungi, lead paint, or any other hazardous or controlled substances not specifically identified herein.

RTC is not responsible for the accuracy of information provided by others, or for conditions or consequences arising from relevant facts that were withheld, concealed, undiscovered, or not fully disclosed. RTC is not a law firm and therefore, makes no representations regarding any potential liability of any person or entity for site conditions. Further, RTC is not qualified to present medical advice. If any present or future health issues are in question, it is recommended that the findings in this report be presented to a qualified medical professional for evaluation.

SECTION 2

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EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

This limited asbestos survey report contains the results of a limited AHERA-style asbestos inspection conducted for Douglas Unified School District (DUSD). The limited asbestos inspection was conducted at Faras Elementary School located at 410 West Fir Avenue in Pirtleville, Arizona 85626. RTC was authorized by DUSD, to perform the limited asbestos inspection.

RTC was informed that the low-sloped roof systems at the South and North Annex Buildings are to be removed and replaced with new roof systems. RTC was also informed that both building shells are to be weatherized with new sealants and coatings.

The limited asbestos inspection of the buildings was conducted on October 12, 2017 by Mr. Michael Crow, an accredited EPA AHERA Asbestos Building Inspector. DUSD outlined the areas and the materials scheduled to be disturbed during the upcoming renovation activities, DUSD instructed RTC to collect bulk samples of all affected materials to be disturbed, and instructed RTC to have those samples analyzed for the presence of asbestos fibers by a qualified laboratory.

A total of thirty-three (33) bulk samples were collected from the suspect building materials within the outlined areas of the building. The suspect bulk samples were submitted to EMLab P&K, LLC (EMLab) for analysis using Polarized Light Microscopy (PLM) methods. EMLab used the methods prescribed in Method 40 CFR, Part 763, in the Code of Federal Register in analyzing bulk samples. EMLab is certified by the National Institute of Standards and Technology (NIST) as adhering to and in compliance with the National Voluntary Laboratory Accreditation Program (NVLAP) and holds the certification number 500031-0. The suspect asbestos bulk samples were collected and submitted to the laboratory using established chain of custody procedures. Bulk samples were collected utilizing safety and health practices as required by the Occupational Safety and Health Administration (OSHA).

Below are the suspect building materials that were sampled during the limited asbestos inspection:

- South Annex Building – Mortar
- **South Annex Building – Building Sealant (7% Chrysotile)**
- South Annex Building – Asphalt Roof
    - White Roofing Material
    - Black Roofing Shingle with White Pebbles
    - Black Roofing Tar
- South Annex Building – Roof Sealant
- South Annex Building – White Repair Sealant
- South Annex Building – Asphalt Roof 2nd Layer
    - Black roofing shingle with White Pebbles
    - Black Roofing Tar
    - Yellow Foam
    - Brown Fibrous Material
- North Annex Building – Mortar
- **North Annex Building – Building Sealant (7% Chrysotile)**
- North Annex Building – Asphalt Roof
    - White Roofing Material
    - Black Roofing Shingle with White Pebbles
- North Annex Building – Roof Sealant
- North Annex Building – White Repair Sealant

The sampled building materials outlined in Table 1, were reported by laboratory PLM analysis to contain > 1% asbestos.

Table 1

Material	Location	NESHAP Category	OSHA Classification	Estimated Quantity	Laboratory Results
Building Sealant (Tan Sealant with Multi-Layered Paint)	South Annex	Cat. II / N/A	Class II	< 160 SF	7% Chrysotile
Building Sealant (Tan Sealant with Multi-Layered Paint)	North Annex	Cat. II / N/A	Class II	< 160 SF	7% Chrysotile

NESHAP Category II non-friable ACM is any material containing more than 1% asbestos as determined using PLM according to the methods specified in Appendix A, Subpart F, 40 CFR Part 763 that when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

OSHA Class II work means any activity involving the removal of ACM which is not thermal systems insulation (TSI) or surfacing material.

Note: NESHAP is not applicable for this project because the amount of affected material is less than 160 ft².

RECOMMENDATIONS

RTC recommends that the asbestos-containing material (ACM) be removed by a qualified asbestos abatement contractor. The contractor should comply with all governing regulatory agencies guidelines.

RTC also recommends that the school district consider retaining the services of an independent asbestos consulting firm to; have an AHERA accredited Project Designer write an industry standard technical specification for the abatement activities and to have an AHERA accredited Contractor Supervisor to monitor the performance of the qualified and licensed abatement contractor. Depending on the extent of the above services that are performed, on completion the consultant can then provide final close-out documentation of the abatement activities.

All documentation is provided to Douglas Unified School District, and should be retained in a permanent record. Should you have any questions regarding the procedures that were followed on this project, please contact me at any time. Thank you for the opportunity to provide these environmental consulting services.

Michael L. Crow
Managing Partner

EPA AHERA Asbestos Building Inspector
AHERA Certificate Number: 25511-3485861-105007
Expires: March 23, 2018

SECTION 3

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SITE MAP

SITE MAP

Site Overview of Faras Elementary School. The North and South Annex buildings are identified by the red arrows.

SECTION 4

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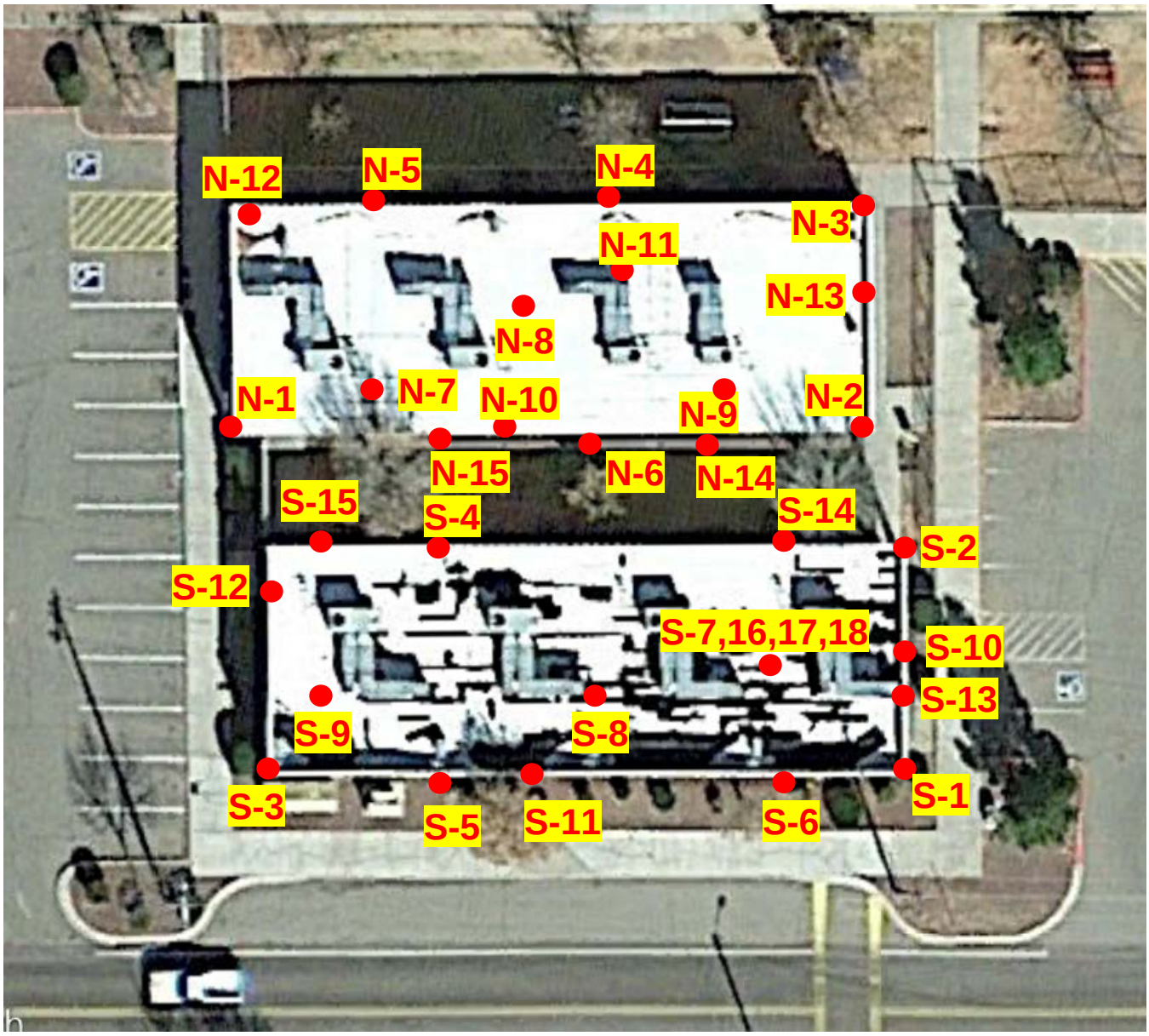
PLM BULK SAMPLE LOCATION MAP

PLM BULK SAMPLE LOCATION MAP



SECTION 5

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PLM LABORATORY ANALYSIS REPORT

EMLab P&K
A TestAmerica Company

Report for:

Mike Crow
Red Tree Consulting, LLC
7845 E. Redfield Rd. Suite 100
Scottsdale, AZ 85260

Regarding: Project: Faras Elementary; North & South Annex
EML ID: 1813160

Approved by:

Renee Luna-Trepczynski

Approved Signatory
Renee Luna-Trepczynski

Dates of Analysis:
Asbestos PLM: 10-18-2017

Service SOPs: Asbestos PLM (EPA Methods 600/R-93/116 & 600/M4-82-020, SOP EM-AS-S-1267)

All samples were received in acceptable condition unless noted in the Report Comments portion in the body of the report. The results relate only to the items tested. The results include an inherent uncertainty of measurement associated with estimating percentages by polarized light microscopy. Measurement uncertainty data for sample results with >1% asbestos concentration can be provided when requested.

EMLab P&K ("the Company") shall have no liability to the client or the client's customer with respect to decisions or recommendations made, actions taken or courses of conduct implemented by either the client or the client's customer as a result of or based upon the Test Results. In no event shall the Company be liable to the client with respect to the Test Results except for the Company's own willful misconduct or gross negligence nor shall the Company be liable for incidental or consequential damages or lost profits or revenues to the fullest extent such liability may be disclaimed by law, even if the Company has been advised of the possibility of such damages, lost profits or lost revenues. In no event shall the Company's liability with respect to the Test Results exceed the amount paid to the Company by the client therefor.

EMLab P&K
1501 West Knudsen Drive, Phoenix, AZ 85027
(800) 651-4802 Fax (623) 780-7695 www.emlab.com

Client: Red Tree Consulting, LLC
C/O: Mike Crow
Re: Faras Elementary; North & South Annex

Date of Sampling: 10-12-2017
Date of Receipt: 10-13-2017
Date of Report: 10-18-2017

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Total Samples Submitted:	33
Total Samples Analyzed:	33
Total Samples with Layer Asbestos Content > 1%:	6

Location: S-1, S. Annex - Mortar Lab ID-Version‡: 8489495-1

Sample Layers	Asbestos Content
Light Brown Mortar with White Paint	ND
Sample Composite Homogeneity:	Good

Location: S-2, S. Annex - Mortar Lab ID-Version‡: 8489496-1

Sample Layers	Asbestos Content
Light Brown Mortar with White Paint	ND
Sample Composite Homogeneity:	Good

Location: S-3, S. Annex - Mortar Lab ID-Version‡: 8489497-1

Sample Layers	Asbestos Content
Light Brown Mortar with White Paint	ND
Sample Composite Homogeneity:	Good

Location: S-4, S. Annex - Building Sealant Lab ID-Version‡: 8489498-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Location: S-5, S. Annex - Building Sealant Lab ID-Version‡: 8489499-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
‡ A "Version" indicated by -"x" after the Lab ID# with a value greater than 1 indicates a sample with amended data. The revision number is reflected by the value of "x".

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Date of Report: 10-18-2017

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: S-6, S. Annex - Building Sealant Lab ID-Version‡: 8489500-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Location: S-7, S. Annex - Asphalt Roof Lab ID-Version‡: 8489501-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

Location: S-8, S. Annex - Asphalt Roof Lab ID-Version‡: 8489502-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Black Roofing Tar	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

Location: S-9, S. Annex - Asphalt Roof Lab ID-Version‡: 8489503-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: S-10, S. Annex - Roof Sealant Lab ID-Version‡: 8489504-1

Sample Layers	Asbestos Content
White Sealant	ND
Sample Composite Homogeneity:	Good

Location: S-11, S. Annex - Roof Sealant Lab ID-Version‡: 8489505-1

Sample Layers	Asbestos Content
White Sealant	ND
Sample Composite Homogeneity:	Good

Location: S-12, South Annex - Roof Sealant Lab ID-Version‡: 8489506-1

Sample Layers	Asbestos Content
White Sealant	ND
Sample Composite Homogeneity:	Good

Location: S-13, South Annex - White Repair Sealant Lab ID-Version‡: 8489507-1

Sample Layers	Asbestos Content
White Sealant	ND
Gray Sealant	ND
Sample Composite Homogeneity:	Moderate

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: S-14, South Annex - White Repair Sealant Lab ID-Version‡: 8489508-1

Sample Layers	Asbestos Content
Gray Sealant	ND
Sample Composite Homogeneity:	Good

Location: S-15, South Annex - White Repair Sealant Lab ID-Version‡: 8489509-1

Sample Layers	Asbestos Content
White Sealant	ND
Gray Sealant	ND
Sample Composite Homogeneity:	Moderate

Location: S-16, South Annex - 2nd Roof Later - Asphalt Lab ID-Version‡: 8489510-1

Sample Layers	Asbestos Content
Black Roofing Shingle with White Pebbles	ND
Black Roofing Tar	ND
Yellow Foam	ND
Composite Non-Asbestos Content:	7% Glass Fibers
Sample Composite Homogeneity:	Moderate

Location: S-17, South Annex - 2nd Roof Later - Asphalt Lab ID-Version‡: 8489511-1

Sample Layers	Asbestos Content
Black Roofing Shingle with White Pebbles	ND
Black Roofing Tar	ND
Yellow Foam	ND
Brown Fibrous Material	ND
Composite Non-Asbestos Content:	15% Cellulose 5% Glass Fibers
Sample Composite Homogeneity:	Poor

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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Date of Sampling: 10-12-2017
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Date of Report: 10-18-2017

ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: S-18, South Annex - 2nd Roof Later - Asphalt Lab ID-Version‡: 8489512-1

Sample Layers	Asbestos Content
Black Roofing Shingle with White Pebbles	ND
Black Roofing Tar	ND
Yellow Foam	ND
Brown Fibrous Material	ND
Composite Non-Asbestos Content:	15% Cellulose 5% Glass Fibers
Sample Composite Homogeneity:	Poor

Location: N-1, North Annex - Mortar Lab ID-Version‡: 8489513-1

Sample Layers	Asbestos Content
Gray Mortar with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Location: N-2, North Annex - Mortar Lab ID-Version‡: 8489514-1

Sample Layers	Asbestos Content
Gray Mortar with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Location: N-3, North Annex - Mortar Lab ID-Version‡: 8489515-1

Sample Layers	Asbestos Content
Gray Mortar with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: N-4, North Annex - Building Sealant Lab ID-Version‡: 8489516-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Location: N-5, North Annex - Building Sealant Lab ID-Version‡: 8489517-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Location: N-6, North Annex - Building Sealant Lab ID-Version‡: 8489518-1

Sample Layers	Asbestos Content
Tan Sealant with Multilayered Paint	7% Chrysotile
Sample Composite Homogeneity:	Good

Location: N-7, North Annex - Asphalt Roof Lab ID-Version‡: 8489519-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: N-8, North Annex - Asphalt Roof Lab ID-Version‡: 8489520-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

Location: N-9, North Annex - Asphalt Roof Lab ID-Version‡: 8489521-1

Sample Layers	Asbestos Content
White Roofing Material	ND
Black Roofing Shingle with White Pebbles	ND
Composite Non-Asbestos Content:	10% Synthetic Fibers
Sample Composite Homogeneity:	Moderate

Location: N-10, North Annex - Roof Sealant Lab ID-Version‡: 8489522-1

Sample Layers	Asbestos Content
White Sealant with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Location: N-11, North Annex - Roof Sealant Lab ID-Version‡: 8489523-1

Sample Layers	Asbestos Content
White Sealant with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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ASBESTOS PLM REPORT: EPA-600/M4-82-020 & EPA METHOD 600/R-93-116

Location: N-12, North Annex - Roof Sealant Lab ID-Version‡: 8489524-1

Sample Layers	Asbestos Content
White Sealant with Multilayered Paint	ND
Sample Composite Homogeneity:	Good

Location: N-13, North Annex - White Repair Sealant Lab ID-Version‡: 8489525-1

Sample Layers	Asbestos Content
White Sealant	ND
Gray Sealant	ND
Sample Composite Homogeneity:	Moderate

Location: N-14, North Annex - White Repair Sealant Lab ID-Version‡: 8489526-1

Sample Layers	Asbestos Content
White Sealant	ND
Gray Sealant	ND
Sample Composite Homogeneity:	Moderate

Location: N-15, North Annex - White Repair Sealant Lab ID-Version‡: 8489527-1

Sample Layers	Asbestos Content
White Sealant	ND
Gray Sealant	ND
Sample Composite Homogeneity:	Moderate

Inhomogeneous samples are separated into homogeneous subsamples and analyzed individually. ND means no fibers were detected. When detected, the minimum detection and reporting limit is less than 1% unless point counting is performed. Floor tile samples may contain large amounts of interference material and it is recommended that the sample be analyzed by gravimetric point count analysis to lower the detection limit and to aid in asbestos identification.
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SECTION 6

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ACM LOCATION MAP

ACM LOCATION MAP

KEY

Building Sealant (Tan Sealant with Multilayered Paint)

SECTION 7

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GENERAL NOTES/EXCLUSIONS

GENERAL NOTES/EXCLUSIONS

- DUSD outlined the areas and the materials scheduled to be disturbed during the upcoming restoration activities, instructed RTC to only collect bulk samples of the outlined materials, and to have those samples analyzed for the presence of asbestos fibers by a qualified laboratory.

- This was a limited inspection and those areas and materials not specifically identified in this report were not inspected; nor any area outside the specific area described herein.

- If any un-sampled suspect building materials are discovered during the renovation activities, those materials should be properly sampled by a certified inspector and analyzed by a qualified laboratory prior to their disturbance.

SECTION 8

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INSPECTOR CERTIFICATIONS

25511-3485861-105007

THE ASBESTOS INSTITUTE

Certifies that MICHAEL CROW

has attended the EPA approved course

AHERA Building Inspector Refresher

and successfully passed and completed
the competency exam.

This training meets all requirements for asbestos
accreditation under TSCA Title II.

THE ASBESTOS INSTITUTE
arizona - california - nevada
EST. 1988

Issue Date : 23-Mar 2017

Expiration Date : 23-Mar 2018

Approved Instructor

20033 N. 19th Avenue, Building 6, Phoenix, AZ 85027
602 -8 64 - 6564 - www.theasbestosinstitute.com

SECTION 9

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LABORATORY CERTIFICATION

United States Department of Commerce
National Institute of Standards and Technology

Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 500031-0

EMLab P&K

Phoenix, AZ

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

Asbestos Fiber Analysis

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

2017-01-01 through 2017-12-31

Effective Dates

DEPARTMENT OF COMMERCE * UNITED STATES OF AMERICA *

For the National Voluntary Laboratory Accreditation Program

NVLAP® National Voluntary Laboratory Accreditation Program

SCOPE OF ACCREDITATION TO ISO/IEC 17025:2005

EMLab P&K
1501 W. Knudsen Dr.
Phoenix, AZ 85027-1307
Mr. Dan Shelby
Phone: 623-298-1015
Email: dshelby@emlabpk.com
http://www.emlab.com

ASBESTOS FIBER ANALYSIS — NVLAP LAB CODE 500031-0

Bulk Asbestos Analysis

Code	*Description*
18/A01	EPA 600/M4-82-020: Interim Method for the Determination of Asbestos in Bulk Insulation Samples
18/A03	EPA 600/R-93/116: Method for the Determination of Asbestos in Bulk Building Materials

For the National Voluntary Laboratory Accreditation Program