

November 25, 2020

VIA EMAIL: jason.parenteau@sodexo.com

Mr. Jason Parenteau General Manager Attleboro School District 100 Rathbun Willard Drive Attleboro, Massachusetts 02703

Project No. 413225

Subject: Asbestos Reinspection, 2020

Studley Elementary School Attleboro, Massachusetts

Dear Mr. Parenteau:

Please find enclosed the three-year re-inspection report for the Studley Elementary School. If you require any further assistance, please feel free to contact me at (781) 337-0016.

Thank you for allowing TRC Environmental, Inc (TRC) to assist you with this project.

Sincerely,

TRC Environmental, Inc

Gregory Hatch

BSI Office Practice Leader

MA Certified Asbestos Inspector (AI061535)

MA Certified Management Planner (AP061534)



AHERA 3-YEAR REINSPECTION REPORT STUDLEY ELEMENTARY SCHOOL

SUBMITTED TO:

Mr. Jason Parenteau General Manager Attleboro School District 100 Rathbun Willard Drive Attleboro, Massachusetts 02703

SUBMITTED BY:

TRC ENVIRONMENTAL, INC. 814 Broad Street Weymouth, Massachusetts 02189

PROJECT NO. 413225

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AHERA 3-YEAR REINSPECTION REPORT STUDLEY ELEMENTARY SCHOOL ATTLEBORO, MASSACHUSETTS

Submitted To:

Mr. Jason Parenteau General Manager Attleboro School District 100 Rathbun Willard Drive Attleboro, Massachusetts 02703

Inspector:

Gregory Hatch

BSI – Office Practice Leader TRC Environmental, Inc Massachusetts Inspector # AI061535

November 25, 2020



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1.0 <u>INTRODUCTION</u>

TRC Environmental, Inc (TRC) was retained by the Attleboro Public School to perform a three-year reinspection at the Studley Elementary School located at 299 Rathbun Willard Drive in Attleboro, Massachusetts.

The inspection was performed on October 28, 2020 by TRC's Industrial Hygienist, Gregory Hatch, with Massachusetts State Accreditation # AI061535.

The purpose of this inspection is to visually reinspect and reassess all friable and non-friable known or assumed asbestos-containing building material (ACBM) within the school facility in compliance with the United States Environmental Protection Agency's (USEPA) Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763.85 [b]).

The reinspection was conducted in two phases.

PHASE I

- Review the existing management plan and discuss with the designated person response actions completed.
- Review abatement/remedial activities, work orders and training records since management plan implementation, if applicable.
- Obtain 8 1/2" x 11" drawings from the Local Education Agency (LEA).

PHASE II

- Visually re-inspect and reassess the condition of all friable known or assumed ACBM.
- Visually inspect material that was previously identified as non-friable ACBM and touch the material to determine whether it has become friable since the last inspection or reinspection.
- Identify homogeneous areas with materials that have become friable since the last inspection or reinspection.
- Assess the condition of any newly friable materials.
- Submit to the designated person any assessments or reassessments made of <u>friable</u> known or assumed ACBM as identified in the original inspection report.
- Submit a report detailing the results of the reinspection for inclusion into the LEA's management plans.



2.0 <u>DISCUSSION</u>

The management plan on file at the office of the LEA was reviewed and the following summarizes this review.

2.1 <u>Designated Person</u>

Mr. Jason Parenteau General Manager Attleboro School District 100 Rathbun Willard Drive Attleboro, Massachusetts 02703

The AHERA regulation 763.84[g](1) states that "the general LEA shall designate a person to ensure that requirements under this section are properly implemented". Section 763.84[g](2) further states that "the LEA shall ensure that the designated person receives adequate training to perform duties assigned under this section".

2.2 <u>Yearly Building Occupant Notification</u>

"The designated person must ensure that workers and building occupants, or their legal guardians and any company that conducts work in the building, are informed at least once each school year about inspections, response actions, and post-response action activities, including periodic re-inspection and surveillance activities that are planned or in progress", as per the AHERA regulation section 763.84(c).

The records for previous years have been incorporated into the management plan for the school. A copy of the letter is attached in Appendix F. It is recommended that a copy of the letter for each year and be sure to include the contact information of the LEA. TRC recommends that copies of the records be incorporated into the management plans to satisfy the requirement to maintain and update the plan.

2.3 Custodial/Maintenance Personnel Training

Custodial and maintenance personnel hired are required to receive a minimum of 2 hours "asbestos awareness training". Training should be provided within 60 days of employment.

Documentation of the 2-hour Asbestos Awareness training for custodial staff that may be working in the building was included in the Management Plan. These records should be cross-checked with the list of personnel currently working in the building. If any staff remains untrained, training should be provided for and documentation should be added to the Management Plan.



2.4 Periodic Surveillance

The LEA shall conduct six-month periodic surveillance of all known ACBM present in each school in accordance with the AHERA Regulation. A 2-hour trained staff member may conduct the six-month inspection. The inspection is performed to document any changes in condition in the ACBMs.

Records were available documenting the most recent six-month periodic surveillance inspections. TRC recommends documenting these periodic inspections including date completed and signed by the trained person who conducted the inspection. Copies of these records should be entered into the management plan to satisfy the requirement to maintain and update the plan. The records should be maintained in a central location. The attached Appendix B can be copied and used as a basis for the re-inspection.

2.5 Warning Labels

As per the AHERA regulation section 763.95[a], "the LEA shall attach a warning label immediately adjacent to any friable and non-friable ACBM and suspected ACBM assumed to be asbestos-containing material (ACM) located in routine maintenance areas (such as boiler rooms) at each school building".

There are no accessible suspect materials identified in the mechanical room areas, only potential boiler interior components.

2.6 Summary of Response Actions

According to the LEA, there hasn't been any renovation work in the school in the last three years or since the last AHERA 3-year inspection performed in July 2017.



3.0 REINSPECTION EPA ASSESSMENT SUMMARY

3.1 **ACBM Remaining**

Asbestos-containing and assumed asbestos containing building materials remaining in the building includes:

Surfacing Materials

No suspect surfacing materials were identified.

Thermal System Insulation

No suspect TSI was observed.

Miscellaneous Materials

Miscellaneous materials are in areas throughout the school building. Detailed locations, amounts and condition information can be found in Appendix B and C.

3.2 Additional ACBM Identified

Additional ACBM was identified during the reinspection. Each of the classrooms 16-26 has a carpeted area. A cursory inspection beneath carpet in several of the classrooms identified the floor tile/mastic. The floor tile and mastic were sampled, and lab analysis determined both the tile and the mastic contain asbestos. The laboratory report can be found in Appendix G. It is assumed to be a typical condition throughout rooms 16-26 however, a more thorough inspection is needed to confirm. It is not located in the corner Computer room.

A floor tile and mastic were also identified on the floor of the wooden storage cabinets located in rooms 9-17 and 19-25. The floor tile and mastic were sampled, and lab analysis determined both the tile and the mastic contain asbestos. The laboratory report can be found in Appendix G.

3.3 Results and Recommendations

The identified ACBM remaining in the Studley Elementary School was inspected and found to be in generally good condition.

The remainder of the materials should continue to be maintained in place under the O & M plan until removal is made necessary by renovations or demolition.



4.0 **CONCLUSIONS**

The AHERA three-year reinspection at the Studley Elementary School was performed on October 28, 2020 in accordance with the AHERA regulations. A management plan audit was performed with additional results and recommendations for correction and updating the management plan listed in Section 2 of this report.

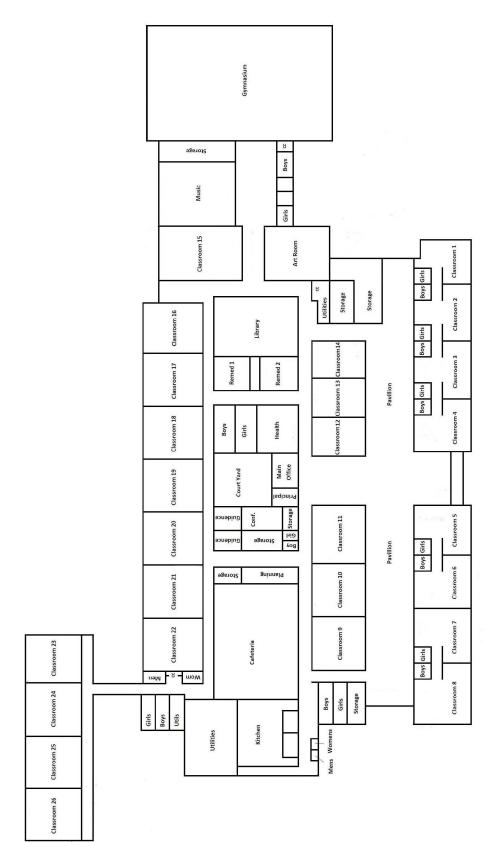
The ACM/PACM was found to be in good condition with a low potential for damage.

Recommendations/schedule/Cost:

- a. There will be a cost for response actions between this re-inspection and the next. This is dependent on renovation and operation/maintenance activities.
- b. There will be time associated with each six-month periodic inspection. It is anticipated that this activity would require half of a work shift including reporting documentation.

APPENDIX A

FLOOR PLANS



Studley Elementary School

APPENDIX B ACBM REMAINING

ACBM REMAINING

The following abbreviations were used in the Reinspection Assessment Table that follows:

The assessment is divided into two categories. The physical assessment and the hazard potential assessment as follows:

PHYSICAL ASSESSMENT:

The physical assessment is divided into the following seven categories and describes the material condition at the time of the inspection:

| Physical Condition #1 - | Damaged or significantly damaged thermal insulation. |
|-------------------------|---|
| Physical Condition #2 | Damaged friable surfacing ACM. |
| Physical Condition #3 | Significantly damaged friable surfacing ACM. |
| Physical Condition #4 | Damaged or significantly damaged friable miscellaneous ACM. |
| Physical Condition #5 | ACBM with potential for damage. |
| Physical Condition #6 | ACBM with potential for significant damage. |
| Physical Condition #7 | Any remaining friable ACBM or friable suspected ACBM. |

HAZARD ASSESSMENT:

The hazard assessment is a combination of the physical assessment combined with the potential for disturbance (i.e. physical contact, vibration air movement) as follows:

 $Hazard\ rank\ \#1-Good\ condition/Low\ potential\ for\ disturbance$

Hazard rank #2 – Good condition/ Moderate potential for disturbance

 $Hazard\ rank\ \#3-Good\ condition/\ High\ potential\ for\ disturbance$

 $Hazard\ rank\ \#4-Fair\ condition/Low\ potential\ for\ disturbance$

Hazard rank #5 – Fair condition/Moderate potential for disturbance

Hazard rank #6 – Fair condition/ High potential for disturbance

Hazard rank #7 – Poor condition (significant damage)

Studley Elementary School 3-YEAR REINSPECTION ASSESSMENT TABLE

October 28, 2020 Project No. 413225

| Location: Building- Floor/Room or Area | Type of Material | Quantity | Homogenous Area Number | Physical / Hazard Assess- ment | Condition | Friable/Non -Friable (F/NF) |
|---|--|---------------------------|------------------------------|--------------------------------|------------|-----------------------------------|
| Rooms 1-8 | Gray sink undercoat | 8 EA | НА-6 | 5/1 | Good | NF |
| Rooms 1-8, Art room, Music room, Rooms 12-14 and 15-26, Utilities, and Hallways | Brown cove base | 4,200 LF | HA-10 | 5/1 | Good | NF |
| Rooms 1-8, Art room, Music room, Rooms 12-14 and 15-26, Utilities, and Hallways | Mastic | 4,200 LF | HA-11 | 5/1 | Good | NF |
| Rooms 1-4 | 12"x12" green with dark green VFT | 800 SF | HA-14 | 5/1 | Good | NF |
| Rooms 1-4 | Mastic | 800 SF | HA-15 | 5/1 | Good | NF |
| Rooms 12-14 and 19-26 | 12"x12" salmon color VFT | 3,000 SF | HA-23 | 5/1 | Good | NF |
| Rooms 12-14 and 19-26 | Mastic | 3,000 SF | HA-24 | 5/1 | Good | NF |
| Boiler in boiler room | Interior Boiler Components | Unknown | HA-30 | Not | accessible | |
| Under carpet in Rooms 16-26 | 9"x9" Brown VFT | 8,800 SF* ¹ | HA-31 | 5/1 | Good | NF |
| Under carpet in Rooms 16-26 | Mastic | 8,800 SF* ¹ | HA-32 | 5/1 | Good | NF |
| In storage cabinets in classrooms 9-17 and 19-25 | 9"x9" Tan VFT | 520 SF | HA-33 | 5/1 | Good | NF |
| In storage cabinets in classrooms 9-17 and 19-25 | Mastic | 520 SF | HA-34 | 5/1 | Good | NF |

^{*1} Each of the classrooms identified has a carpeted area. A cursory inspection beneath carpet in several of the classrooms identified the tile. It is assumed to be a typical condition. A more thorough inspection is needed to confirm. It is not located in the corner Computer room.

6- Month Periodic Re-inspection

| Date Re-inspected: | | |
|-------------------------|--|--|
| Re-inspection done by:_ | | |
| Changes in Condition:_ | | |

APPENDIX C HOMOGENOUS AREA SAMPLING GUIDE

HOMOGENOUS AREA SAMPLING GUIDE

Note 1: Where mastic is listed, it is associated with the material above. (i.e. Floor tile is followed by mastic and cove base is followed by mastic etc).

Studley Elementary School

3-YEAR REINSPECTION HOMOGENOUS MATERIAL TABLE

October 28, 2020 **Project No. 413225** Homogenous How Lab Lab ACM Sampled Date Material Material Many Doing Project (Yes/No) Sampled (yes/no) Number **Samples Analysis** Number 12"x12" white with gray VFT HA-1 3 **EMSL** 131804560 Yes No 7/23/18 *1 HA-2 Mastic Yes No 7/23/18 3 **EMSL** 131804560 2'x2' Lay-in 17030160 2 HA 3 Yes No 8/2/17 SanAir ceiling tile Gray vinyl cove HA 4 2 17030160 Yes No 8/2/17 SanAir base 17030160 HA-5 Mastic Yes No 8/2/17 2 SanAir Gray sink Assumed N/A HA-6 No N/A N/A N/A undercoat **ACM** Tectum ceiling 17030160 HA-7 Yes No 8/2/17 2 SanAir board 12"x12" beige **EMSL** 131804560 with brown HA-8 Yes No 07/23/18 3 **VFT** 131804560 HA-9 Mastic Yes No 07/23/18 3 **EMSL** Brown cove Assumed N/A HA-10 No N/A N/A N/A base ACM Assumed HA-11 Mastic No N/A N/A N/A N/A ACM 2" white ceramic tile 0055894 2 **TRC** HA-12 Yes No 10/28/20 grout

Studley Elementary School

3-YEAR REINSPECTION HOMOGENOUS MATERIAL TABLE

October 28, 2020

Project No. 413225

| Homogenous Material Number | Material | Sampled (Yes/No) | ACM (yes/no) | Date Sampled | How Many Samples | Lab Doing Analysis | Lab Project Number |
|----------------------------------|-----------------------------------|---------------------|--------------|-----------------|------------------------|--------------------------|--------------------------|
| HA-13 | 2" white ceramic tile mastic | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-14 | 12"x12" green with dark green VFT | No | Assumed ACM | N/A | N/A | N/A | N/A |
| HA-15 | Mastic | No | Assumed ACM | N/A | N/A | N/A | N/A |
| HA-16 | Sheetrock | Yes | No | 8/2/17 | 2 | SanAir | 17030160 |
| HA-17 | Joint Compound | Yes | No | 8/2/17 | 2 | SanAir | 17030160 |
| HA-18 | 2" beige ceramic tile grout | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-19 | 2" beige ceramic tile mastic | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-20 | Carpet mastic | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-21 | 12"x12" pink with red VFT | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-22 | Mastic | Yes | No | 10/28/20 | 2 | TRC | 0055894 |
| HA-23 | 12"x12" salmon color VFT | No | Assumed ACM | N/A | N/A | N/A | N/A |
| HA-24 | Mastic | No | Assumed ACM | N/A | N/A | N/A | N/A |
| HA-25 | Blue cove base | Yes | No | 8/2/17 | 2 | SanAir | 17030160 |
| HA-26 | Mastic | Yes | No | 8/2/17 | 2 | SanAir | 17030160 |

Studley Elementary School

3-YEAR REINSPECTION HOMOGENOUS MATERIAL TABLE

October 28, 2020

Project No. 413225

| Homogenous Material Number | Material | Sampled (Yes/No) | ACM (yes/no) | Date Sampled | How Many Samples | Lab Doing Analysis | Lab Project Number |
|----------------------------------|---------------------------------|---------------------|-----------------|----------------------|------------------------|--------------------------|--------------------------|
| HA-27 | 12"x12" blue with white VFT | Yes | No | 07/23/18 10/28/20 | 3 2 | EMSL TRC | 131804560 0055894 |
| HA-28 | Mastic | Yes | No | 07/23/18 | 3 | EMSL | 131804560 |
| HA-29 | 2'x4' sheetrock ceiling tile | Yes | No | 8/2/17 | 2 | SanAir | 17030160 |
| HA-30 | Boiler Components*2 | No | Assumed ACM | N/A | N/A | N/A | N/A |
| HA-31 | 9"x9" brown VFT | Yes | Yes | 10/28/20 | 2 | TRC | 0055894 |
| HA-32 | Mastic | Yes | Yes | 10/28/20 | 2 | TRC | 0055894 |
| HA-33 | 9"x9" tan VFT | Yes | Yes | 10/28/20 | 2 | TRC | 0055894 |
| HA-34 | Mastic | Yes | Yes | 10/28/20 | 2 | TRC | 0055894 |

^{*1} – It is noted that the floor tile is gray via lab analysis. The inspector mistakenly called the white/gray floor tile light blue.

^{*2 –} The ACM TSI has been removed. It is assumed that gaskets or other interior components such as fire brick may contain ACM

APPENDIX D EPA AHERA SELF AUDIT CHECKLIST

| AHERA Asbestos Management Plan Self-Audit Checklist for Designated Persons' | | | | |
|---|---|---|--|--|
| School: | | Phone: | | |
| Address: | | | | |
| County: | | | | |
| Local Educ | ation Agency: | Phone: | | |
| Address: | | | | |
| Designated | Person | Phone: | | |
| Address: | | 1 HOUE. | | |
| | | | | |
| | list Completed by Designated | Person: | | |
| <u>Designated</u> | Person's Signature: | | | |
| Yes No N/A N/A - Not Applicable | School: | | | |
| | General I | nformation | | |
| | 1. Has an Asbestos Management Plan l | een developed for your school? | | |
| | | (40 CFR § 763.93) | | |
| | 2. Does the Local Education Agency (I management plan in both the LEA's a | .EA) have a complete and up-to-date copy of the school's iministrative office and the school's administrative office? | | |
| | | and the solider statistics white soliders | | |
| | | (40 CFR § 763.93(g)(2)-(3)) | | |
| | 3. Was the management plan developed by an accredited management planner? | Did you know? Your LEA may require each management plan to contain a statement signed by an accredited management plan developer that he/she has prepared or assisted in the preparation of the plan or has reviewed the plan and that the plan is in compliance with 40 CFR 763, Subpart E. The management plan developer that signs the statement may not also implement the plan (40 CFR § 763.93(f)). | | |
| | | (40 CFR § 763.93(e)) | | |

^{*}References to Model Asbestos Management Plan (AMP) forms are to the forms contained in EPA Region 2's guidance manual, published March 2004, entitled: "Model AHERA Asbestos Management Plan for Local Education Agencies." The Model AMP forms and this Self-Audit Checklist are not a substitute for the applicable legal requirements, are not regulations themselves, and are not required to be used/completed under AHERA. Rather, they are provided by EPA Region 2 as guidance to enhance schools' compliance with EPA AHERA regulations regarding the required documentation that must be included in the AMP. These documents do not impose legally binding requirements on any party, including EPA, states, or the regulated community, and are not intended and cannot be relied upon to create any rights, substantive or procedural, enforceable by any party in litigation with the United States. Please contact your state asbestos coordinator for any applicable state regulations/AMP Forms.



| Yes No N/A N/A - Not Applicable | School: |
|------------------------------------|--|
| | 4. For each consultant who contributed to the management plan, does the plan include the following: consultant's name? a statement that he/she is accredited under the state accreditation program or another state's accreditation program or an EPA-approved course? |
| | (40 CFR § 763.93 (e)(12)(i)-(ii)) |
| | Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each consultant. |
| | *Tip: See suggested Model AMP Form 1 - Contact Information |
| | 5. Does the management plan include a list of the name and address of each building used as a school building and identify whether the school building has: • friable ACBM (asbestos-containing building material)? • non-friable ACBM? • friable and non-friable suspected ACBM assumed to be ACM (asbestos-containing material)? (40 CFR §§ 763.93(a)(1)-(2) and 763.93(e)(1)) |
| | *Tip: See Model AMP Form 2 - School Building List |
| | 6. If a new school building was constructed after October 12, 1988 and is asbestos-free, does the management plan include the following and has a copy of same been provided by the LEA to the EPA Regional Office: a statement signed by an architect or project engineer responsible for the construction of the building, or by an accredited inspector, indicating that no ACBM was specified as a building material in any construction document for the building, or, to the best of his or her knowledge, no ACBM was used as a building material in the building? |
| | (40 CFR § 763.99(a)(7)) |
| | *Tip: See Model AMP Form 2 - School Building List |
| | 7. Does the management plan include a copy of any of the statements required under 40 CFR § 763.99(a)(1)-(7) to support an exclusion from inspection that the school may qualify for under 40 CFR § 763.99 and has a copy of any such statement been provided by the LEA to the Regional Office? |
| | (40 CFR § 763.99) |
| | Note: The exclusion under 40 CFR § 763.99(a)(7) is also covered under Checklist question number 6. |



| Yes No N/A N/A - Not Applicable | School: | | | |
|------------------------------------|--|--|--|--|
| | 8. Does the management plan include the following information al (DP): Name, address, and telephone number of the DP? Course name, dates, and hours of training that the DP attended duties? Signed statement by the DP that the LEA's general responsibili § 763.84 have been or will be met? | to carry out his or her AHERA | | |
| | | (40 CFR § 763.93(e)(4) and (i)) | | |
| | Note: Although not required, EPA suggests including in the AMP a copy of the DP's training certificates. | the name of the training agency and | | |
| | *Tip: See Model AMP Form 1 - Contact Information and Form 3 | · · · · · · · · · · · · · · · · · · · | | |
| | 9. Does the management plan include the following recommendations: A plan for reinspection required under 40 CFR § 763.85? A plan for operations and maintenance activities (including initial cleaning) required under 4 § 763.91? A plan for periodic surveillance required under 40 CFR § 763.92? A description of the management planner's recommendation for additional cleaning under 4 § 763.91(c)(2), as part of an operations and maintenance program, and the response of the Lithat recommendation? | | | |
| | *Tip: See Model AMP Form 10 - Plan for Reinspection, Form 14 Maintenance Activities, Form 18 - Periodic Surveillance Plan/Repo | (40 CFR § 763.93(e)(9)) - Plan for Operations and port, and Form 16 Cleaning Record | | |
| | 10. Does the management plan include an evaluation of resources ractions, reinspections, operations and maintenance, and periodic su | needed to carry out response | | |
| | | (40 CFR § 763.93(e)(11)) | | |
| | *Tip: See suggested Model AMP Form 4 - Evaluation of Resource | es | | |
| | 40 CER 6 762 02(a)(1) for all maining required under employ | ou know? New custodial and maintenance bysees must be trained within 60 days after ag work (40 CFR §763.92(a)(1)). | | |
| | | (40 CFR §§ 763.93(h) and 763.94(c)) | | |
| | Note: Although not required, EPA suggests including in the AMP to course name, and a copy of the accreditation certificate for each sta | the name of the training agency, the aff person. | | |
| | *Tip: See Model AMP Form 5 - Training Record for Maintenance and Custodial Staff | | | |



| Yes No N/A | School: |
|----------------------|---|
| N/A - Not Applicable | |
| | 12. Does the management plan include a record of the additional 14 hours of training required under 40 CFR § 763.92(a)(2) for maintenance and custodial staff who conduct any activities that will result in the disturbance of ACBM and does the record include the following information: • person's name and job title? • date training was completed? • location of training? • number of hours completed? (40 CFR §§ 763.93(h) and 763.94(c)) |
| | Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name, and a copy of the accreditation certificate for each staff person. |
| | *Tip: See Model AMP Form 5 - Training Record for Maintenance and Custodial Staff |
| | Inspections and Reinspections |
| | 13. For inspections conducted before 12/14/87 (i.e., the effective date of the 10/30/87 EPA Asbestos-Containing Materials in Schools rule), does the management plan include the following information: date of inspection? blueprint, diagram or written description of each school building that identifies clearly each location and approximate square or linear footage of homogenous /sampling area sampled for ACM? if possible, the exact locations where the bulk samples were collected and the dates of collection? a copy of the analyses of any bulk samples, dates of analyses, and a copy of any other laboratory reports pertaining to the analyses. description of response actions or preventive measures taken, including, if possible, the names and addresses of all contractors, start and completion dates and air clearance sample results? description of assessments of material identified prior to 12/14/87 as friable ACBM or friable suspected ACBM assumed to be ACM, and the name, signature, state of accreditation and if, applicable, the accreditation number of the person making the assessments (i.e., inspector)? (40 CFR § 763.93(e)(2)(i)-(v)) *Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 8 - Homogeneous Area/Bulk Sample Summary, Form 9 - Homogeneous Area/Bulk Sample Diagram, Form 12 - Implementation of Response Actions, and Form 7 - Room/Functional Space Assessment |
| | 14. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following information: • date of the inspection or reinspection? • name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited inspector performing the inspection or reinspection? (40 CFR § 763.93(e)(3)(i)) Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector. *Tip: See Model AMP Form 6 - Inspection Cover Sheet |



| Yes No N/A N/A - Not Applicable | School: |
|------------------------------------|---|
| | 15. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following sampling information: Blueprint, diagram, or written description of each school building that identifies clearly each location and approximate square or linear footage of homogeneous areas where material was sampled for ACM? Exact location where each bulk sample was collected and the date of collection of each bulk sample? Homogeneous areas where friable suspected ACBM is assumed to be ACM? Homogeneous areas where nonfriable suspected ACBM is assumed to be ACM? Description of the manner used to determine sampling locations? The name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited inspector that collected samples? |
| | (40 CFR § 763.93(e)(3)(ii)-(iii)) |
| | Note: For details on how to collect bulk samples, see 40 CFR § 763.86. Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector that collected the samples. |
| | *Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 8 - Homogeneous Area/Bulk Sample Summary, and Form 9 - Homogeneous Area/Bulk Sample Diagram |
| | 16. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following information on the analysis of the bulk samples and has it been submitted to the DP for inclusion in the plan within 30 days of the analysis: Copy of the analysis of any bulk samples collected and analyzed? Name and address of any laboratory that analyzed bulk samples? A statement that any laboratory used meets the applicable laboratory accreditation requirements of 40 CFR § 763.87(a)? Dates of any analyses performed? Name and signature of the person performing each analysis? |
| | (40 CFR §§ 763.87(d) and 763.93(e)(3)(iv)) |
| | Note: For details on how to submit bulk samples for analysis, see 40 CFR § 763.87. |
| | 17. Does the management plan include for each inspection and reinspection conducted under 40 CFR § 763.85 the following assessment information and has it been submitted to the DP for inclusion in the plan within 30 days of the assessment: Written assessments (signed and dated) required to be made under 40 CFR § 763.88 of all ACBM and suspected ACBM assumed to be ACBM? Name, signature, state of accreditation, and, if applicable, the accreditation number of each accredited person making the assessment (i.e., inspector(s)) |
| | (40 CFR §§ 763.88(a)(2) and 763.93(c)(3)(v) |
| · | Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each inspector making the assessment. |
| | *Tip: See Model AMP Form 6 - Inspection Cover Sheet and Form 7 - Room/Functional Space Assessment |



| Yes No N/A N/A - Not Applicable | School: |
|------------------------------------|--|
| | 18. Has the following information about the inspection been recorded and submitted to the DP for inclusion in the management plan within 30 days of the inspection: Inspection report with the date of inspection signed by each accredited inspector making the inspection, the state of accreditation, and if applicable, his/her accreditation number? Inventory of the locations of the homogeneous areas where samples are collected, exact location where each bulk sample is collected, dates that samples are collected, homogeneous areas where friable suspected ACBM is assumed to be ACM and homogeneous areas where nonfriable suspected ACBM is assumed to be ACM? Description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, state of accreditation, and, if applicable, his or her accreditation number? List of whether the homogeneous areas identified under 40 CFR § 763.85(a)(4)(vi)(B) of this section, are surfacing material, thermal system insulation, or miscellaneous material? Assessments of friable material (signed and dated), the name and signature of each accredited inspector making the assessment, state of accreditation, and if applicable, his or her accreditation number? (40 CFR § 763.85(a)(4)(vi)(A)-(E) and 763.88(a)(2)) |
| | Note: For further details on activities conducted during an inspection (e.g., visually inspect/touch material), see 40 CFR § 763.85(a)(4)(i)-(v) |
| | *Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 7 - Room/Functional Space Assessment, Form 8 - Homogeneous Area/Bulk Sample Summary and Form 9 - Homogeneous Area /Bulk Sample Diagram |
| | 19. Has the following information about the reinspection been recorded and submitted to the DP for inclusion in the management plan within 30 days of the reinspection: Date of reinspection, name and signature of the person making the reinspection, state of accreditation, and if applicable, his or her accreditation number, and any changes in the condition of known or assumed ACBM? Exact location where samples were collected during the reinspection, a description of the manner used to determine sampling locations, the name and signature of each accredited inspector who collected the samples, state of accreditation, and, if applicable, his or her accreditation number? Any assessments or reassessments of friable material, date of the assessment or reassessment, the name and the signature of the accredited inspector making the assessments, state of accreditation, and if applicable, his or her accreditation number? |
| | (40 CFR §§ 763.85(b)(3)(vii)(A) - (C) and 763.88(a)(2)) |
| | Note: At least once every 3 years after a management plan has been in effect, a reinspection must be conducted by an accredited inspector of all friable and nonfriable known or assumed ACBM in each school building that the LEA leases, owns, or otherwise uses as a school building (40 CFR § 763.85(b)(1)-(2)). For further details on activities conducted during a reinspection (e.g., visually reinspect/touch material), see 40 CFR § 763.85(b)(3)(i)-(vi). |
| | *Tip: See Model AMP Form 6 - Inspection Cover Sheet, Form 7 - Room/Functional Space Assessment, Form 8 - Homogeneous Area/Bulk Sample Summary, Form 9 - Homogeneous Area/Bulk Sample Diagram |



| Yes No N/A N/A - Not Applicable | School: | |
|------------------------------------|--|--|
| Response Actions | | |
| | 20. Does the management plan include the recommendations made to the LEA regarding response actions under 40 CFR § 763.88(d) and the following information about the accredited management planner: name, signature, state of accreditation, and, if applicable, the accreditation number for each accredited management planner making the recommendations? | |
| | (40 CFR §§ 763.88(d) and 763.93(e)(5)) | |
| | Note: Although not required, EPA suggests including in the AMP the name of the training agency, the course name and date, and a copy of the accreditation certificate for each accredited person making the recommendations. | |
| | *Tip: See Model AMP Form 11 - Recommended Response Actions | |
| | 21. Does the management plan include a detailed description of preventive measures and response actions to be taken, including the following: Did you know? The LEA may select, from the response actions which protect human health and the environment, the least burdensome action (40 CFR § 763.90(a)). | |
| | Methods to be used for any friable ACBM? Locations where such measures and actions will be taken? Reasons for selecting the response action or preventive measure? Schedule for beginning and completing each preventive measure or response action? | |
| | (40 CFR § 763.93(e)(6)) | |
| i | Note: For further details on how to conduct response actions, see 40 CFR § 763.90 | |
| | *Tip: See Model AMP Form 11 - Recommended Response Actions | |
| | 22. Does the management plan include one of the following statements for the person or persons who inspected for ACBM and who will design or carry out response actions, except for operations and maintenance, with respect to the ACBM: statement that he/she is accredited under the state accreditation program, or that the LEA has used (or will use) persons accredited under another state's accreditation program or an EPA-approved course? | |
| | (40 CFR § 763.93(e)(7)) | |
| | *Tip: See note on Model AMP Form 3 - Designated Persons Assurances | |



| Yes No N/A N/A - Not Applicable | School: |
|------------------------------------|---|
| | 23. Does the management plan include a detailed written description of each preventive measure and response action taken for friable and nonfriable ACBM and friable and nonfriable suspected ACBM assumed to be ACM, including the following: • Methods used? • Location where the measure or action was taken? • Reasons for selecting the measure or action? • Start and completion dates of the work? • Names and addresses of all contractors involved and, if applicable, their state of accreditation and accreditation numbers? • If ACBM is removed, the name and location of storage or disposal site of the ACM? (40 CFR § 763.94(b)(1)) Note: Although not required, EPA suggests including in the AMP a copy of the accreditation. *Tip: See Model AMP Form 12 - Implementation of Response Actions |
| | 24. Does the management plan include the following sampling information required to be collected at |
| | the completion of certain response actions specified by 40 CFR § 763.90(i): Name and signature of any person collecting any air sample required to be collected? Locations where samples were collected? Date of collection? Name and address of the laboratory analyzing the samples? Date of analysis? Results of analysis? Method of analysis? Name and signature of the person performing the analysis? Statement that the laboratory meets the applicable laboratory accreditation requirements of 40 CFR § 763.90(i)(2)(ii)? (40 CFR § 763.94(b)(2)) |
| | *Tip: See Model AMP Form 12 - Implementation of Response Actions |
| | 25. Does the management plan include a detailed description in the form of a blueprint, diagram, or written description, of any ACBM or suspected ACBM assumed to be ACM that remains in the school once response actions are undertaken under 40 CFR § 763.90 and is the description updated as response actions are completed? (40 CFR § 763.93(e)(8)) |
| | 26. For each homogeneous area where all ACBM has been removed, have records been retained in the management plan for at least 3 years after the next reinspection required under 40 CFR § 763.85(b)(1), or for an equivalent period? Did you know? Significantly damaged friable surfacing ACM or significantly damaged friable miscellaneous ACM must be immediately isolated and access must be restricted unless isolation is not necessary to protect human health and the environment. Then, this material must be removed, or depending upon whether enclosure or encapsulation would be sufficient to protect human health and the environment, enclosed or encapsulated (40 CFR § 763.90(d)(1) - (2)). |



| Yes No N/A N/A - Not Applicable | School: |
|------------------------------------|--|
| | Operations and Maintenance |
| | 27. Does the management plan include a record of each cleaning conducted under 40 CFR § 763.91(c), including the following: Name of each person performing the cleaning? Date of the cleaning? Locations cleaned? Methods used to perform the cleaning? |
| | (40 CFR §§ 763.93(h) and 763.94(e)) |
| | Note: For details on initial cleaning after an inspection and before the initiation of any response action, other than O&M activities or repair, see 40 CFR § 763.91(c)(1) and for details on any additional cleaning recommended by the management planner and approved by the LEA, see 40 CFR § 763.91(c)(2). |
| | *Tip: See Model AMP Form 16 - Cleaning Record |
| | 28. Does the management plan include a record of each O&M activity and major asbestos activity, with the following information: Name of each person performing the activity? For a major asbestos activity, the name, signature, state of accreditation and, if applicable, the accreditation number of each person performing the activity? Start and completion date of each activity? Location of the activity? Description of the activity including preventative measures used? If ACBM is removed, the name and location of the storage and disposal site for the ACM? |
| | (40 CFR §§ 763.93(h) and 763.94(f) and(g)) |
| | Note: The response actions for any maintenance activities disturbing friable ACBM, other than small-scale, short-duration maintenance activities, must be designed by persons accredited to design response actions and conducted by persons accredited to conduct response actions (40 CFR § 763.91(e)). Although not required, EPA suggests including in the AMP a copy of the accreditation. |
| | *Tip: See Model AMP Form 15 - Operations and Maintenance Activities |
| | 29. Does the management plan include a record of each fiber release episode, whether major or minor, with the following information: Date and location of the episode? Method of repair? Preventive measure or response action taken? Name of each person performing the work? If ACBM is removed, the name and location of the storage and disposal site of the ACM? |
| | (40 CFR §§ 763.93(h) and 763.94(h)) |
| | Note: A major fiber release episode is the falling or dislodging of more than 3 square or linear feet of friable ACBM (40 CFR § 763.91(f)(2)). A minor fiber release episode is the falling or dislodging of 3 square or linear feet or less of friable ACBM (40 CFR § 763.91(f)(1)). |
| | *Tip: See Model AMP Form 17 - Major/Minor Fiber Release Episode Log |



| Yes No N/A N/A - Not Applicable | School: | |
|------------------------------------|--|--|
| Periodic Surveillance | | |
| | 30. Does the management plan include a record of each periodic surveillance performed under 40 CFR § 763.92(b), with the following information: Name of person performing the surveillance? Date of the surveillance? Any changes in the condition of the material? | |
| | (40 CFR §§ 763.92(b)(2)(ii)-(iii), 763.93(h) and 763.94(d)) | |
| | Note: A periodic surveillance of each school building must be conducted at least once every 6 months after a management plan has been in effect (40 CFR § 763.92(b)). | |
| | *Tip: See Model AMP Form 18 - Periodic Surveillance Plan/Report | |
| | Notification | |
| | 31. Does the management plan include the following notification information: Description of the steps taken to notify, in writing, at least once a year, parent, teacher and employee organizations of the availability of the management plan for review? Dated copies of all such management plan availability notifications (e.g., letter, newsletter)? Description of the steps taken to inform workers and building occupants, or their legal guardians, about inspections, reinspections, response actions, and post-response action activities, including periodic reinspection and surveillance activities that are planned or in progress? (Under 40 CFR § 763.84(c), the LEA must inform them about these activities at least once each school year.) | |
| | *Tip: See Model AMP Form 19 - Plan to Inform (40 CFR §§ 763.93(e)(10) and 763.93(g)(4)) | |



Appendix A - Glossary

Unless otherwise noted with an asterisk (*), the following definitions contained in this Glossary can be found under 40 CFR § 763.83:

Act means the Toxic Substances Control Act (TSCA), 15 U.S.C. 2601, et seq.

Accessible when referring to asbestos-containing material means that the material is subject to disturbance by school building occupants or custodial or maintenance personnel in the course of their normal activities.

Accredited or accreditation when referring to a person or laboratory means that such person or laboratory is accredited in accordance with section 206 of Title II of the Act.

Air erosion means the passage of air over friable asbestos-containing building material (ACBM) which may result in the release of asbestos fibers.

Asbestos means the asbestiform varieties of: Chrysotile (serpentine); crocidolite (riebeckite); amosite (cummingtonitegrunerite); anthophyllite; tremolite; and actinolite.

Asbestos-containing material (ACM) when referring to school buildings means any material or product which contains more than 1 percent asbestos.

Asbestos-containing building material (ACBM) means surfacing ACM, thermal system insulation ACM, or miscellaneous ACM that is found in or on interior structural members or other parts of a school building.

Asbestos debris means pieces of ACBM that can be identified by color, texture, or composition, or means dust, if the dust is determined by an accredited inspector to be ACM.

Damaged friable miscellaneous ACM means friable miscellaneous ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged friable surfacing ACM means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

Damaged or significantly damaged thermal system insulation ACM means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its



structural integrity, or its covering, in whole or in part, is crushed, water-stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

Designated Person means a person appointed by the Local Education Agency (LEA), under 40 CFR § 763.84 (g), who is trained to ensure the proper implementation of AHERA in school buildings. *

Encapsulation means the treatment of ACBM with a material that surrounds or embeds asbestos fibers in an adhesive matrix to prevent the release of fibers, as the encapsulant creates a membrane over the surface (bridging encapsulant) or penetrates the material and binds its components together (penetrating encapsulant).

Enclosure means an airtight, impermeable, permanent barrier around ACBM to prevent the release of asbestos fibers into the air.

Fiber release episode means any uncontrolled or unintentional disturbance of ACBM resulting in visible emission.

Friable when referring to material in a school building means that the material, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure, and includes previously nonfriable material after such previously nonfriable material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.

Functional space means a room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped ceiling and the floor or roof deck above), such as classroom(s), a cafeteria, gymnasium, hallway(s), designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.

High-efficiency particulate air (HEPA) refers to a filtering system capable of trapping and retaining at least 99.97 percent of all monodispersed particles 0.3 µm in diameter or larger.

Homogeneous area means an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.

Local education agency (LEA) means: (1) Any local educational agency as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 3381). (2) The owner of any nonpublic, nonprofit elementary, or secondary school building. (3) The governing authority of any school operated under the defense dependent's education system provided for under the Defense Dependents' Education Act of 1978 (20 U.S.C. 921, et seq.).

Miscellaneous ACM means miscellaneous material that is ACM in a school building.

Miscellaneous material means interior building material on structural components, structural members or fixtures, such as floor and ceiling tiles, and does not include surfacing material or thermal system insulation.



Nonfriable means material in a school building which when dry may not be crumbled, pulverized, or reduced to powder by hand pressure.

Operations and maintenance program means a program of work practices to maintain friable ACBM in good condition, ensure clean up of asbestos fibers previously released, and prevent further release by minimizing and controlling friable ACBM disturbance or damage.

Phase contrast microscopy (PCM) refers to the procedure outlined in NIOSH Method 7400 for the evaluation of fibers in air samples.*

Polarized light microscopy (PLM) refers to the method outlined in 40 CFR § 763, Appendix E to Subpart E, for the identification of asbestos in bulk samples.*

Potential damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

Potential significant damage means circumstances in which: (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities. (2) There are indications that there is a reasonable likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage. (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

Preventive measures means actions taken to reduce disturbance of ACBM or otherwise eliminate the reasonable likelihood of the material's becoming damaged or significantly damaged.

Removal means the taking out or the stripping of substantially all ACBM from a damaged area, a functional space, or a homogeneous area in a school building.

Repair means returning damaged ACBM to an undamaged condition or to an intact state so as to prevent fiber release.

Response action means a method, including removal, encapsulation, enclosure, repair, operations and maintenance, that protects human health and the environment from friable ACBM.

Routine maintenance area means an area, such as a boiler room or mechanical room, that is not normally frequented by students and in which maintenance employees or contract workers regularly conduct maintenance activities.

School means any elementary or secondary school as defined in section 198 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2854).



School building means: (1) Any structure suitable for use as a classroom, including a school facility such as a laboratory, library, school eating facility, or facility used for the preparation of food. (2) Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education. (3) Any other facility used for the instruction or housing of students or for the administration of educational or research programs. (4) Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described in this definition of "school building" under paragraphs (1), (2), or (3). (5) Any portico or covered exterior hallway or walkway. (6) Any exterior portion of a mechanical system used to condition interior space.

Significantly damaged friable miscellaneous ACM means damaged friable miscellaneous ACM where the damage is extensive and severe.

Significantly damaged friable surfacing ACM means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

State means a State, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the Northern Marianas, the Trust Territory of the Pacific Islands, and the Virgin Islands.

Surfacing ACM means surfacing material that is ACM.

Surfacing material means material in a school building that is sprayed-on, troweled-on, or otherwise applied to surfaces, such as acoustical plaster on ceilings and fireproofing materials on structural members, or other materials on surfaces for acoustical, fireproofing, or other purposes.

Thermal system insulation (TSI) means material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts, or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.

Thermal system insulation ACM means thermal system insulation that is ACM.

Transmission electron microscopy (TEM) refers to the method outlined in 40 CFR § 763, Appendix A to Subpart E, for the identification of asbestos in air samples.*

Vibration means the periodic motion of friable ACBM which may result in the release of asbestos fibers.



Appendix B - Acronyms

ACM - Asbestos-containing material

ACBM - Asbestos-containing building material

AHERA - Asbestos Hazard Emergency Response Act

DOT - Department of Transportation

DP - AHERA Designated Person

EPA - U.S. Environmental Protection Agency

HEPA - High-efficiency particulate air

LEA - Local Education Agency

NIOSH - National Institute for Occupational Safety and Health

NIST - National Institute of Standards and Technology

NVLAP - National Voluntary Laboratory Accreditation Program

O&M - Operations and maintenance

OSHA - Occupational Safety and Health Administration

PCM - Phase contrast microscopy

PLM - Polarized light microscopy

TEM - Transmission electron microscopy

TSI - Thermal system insulation



APPENDIX E MANAGEMENT PLANNER TRAINING INFORMATION

MANAGEMENT PLANNER INFORMATION

MANAGEMENT PLANNER: Gregory Hatch

COMPANY: <u>TRC Environmental</u>

814 Broad Street

Weymouth, MA 02189

<u>(781) 337-0016</u>

SIGNATURE _____ DATE November 15, 2020

Accredited Course: Asbestos Management

Planner Training

State of

Accreditation: <u>Massachusetts</u>

Training

Provided By: Kaselaan & D'Angelo

Refresher Course Training Provided

By: <u>TRC Environmental</u>

Refresher Course

Certificate #: <u>MA 112019-0002</u>

State Certification #: AP 061534

Date of Certification: $\frac{2/21/20}{2}$

APPENDIX F MEMO TO PARENTS



September 1, 2020

To: Parents, Guardians, Teachers, Students, Building Occupants, and Employee

Organizations

From: Marc Furtado, Director of Finance of the Attleboro School District

Re: AHERA Yearly Notification

In the past, asbestos was used extensively in building materials because of its insulating, sound absorbing, and fire retarding capabilities. Virtually any building constructed before the late 1970s contained some asbestos. Intact and undisturbed asbestos materials generally do not pose a health risk. Asbestos materials, however, can become hazardous when, due to damage or deterioration over time, they release fibers. If the fibers are inhaled, they can lead to health problems such as cancer or asbestosis.

In 1986, Congress passed the Asbestos Hazard Emergency Response Act (AHERA) which requires schools to be inspected to identify any asbestos containing building materials. Suspected asbestos-containing building materials were located, sampled (or assumed) and rated according to condition and potential hazard. Every three years, the Attleboro Public School District has conducted a re-inspection to determine whether the condition of the known or assumed asbestos-containing building materials (ACBM) has changed and to make recommendations on managing or removing the ACBM.

The law further requires an asbestos management plan to be in place by July 1989. The Attleboro Public School District developed a plan, as required, which has been continually updated. The plan has several ongoing requirements: publish a notification on management plan and how to deal with it; notify short term or temporary workers on the locations of the ACBM; post warning labels in routine maintenance areas where asbestos was previously identified or assumed; follow set plans and procedures designed to minimize the disturbance of the ACBM; and survey the condition of the materials every six months to assure that they remain in good condition.

It is the intention of the Attleboro Public School District to comply with all federal and state regulations and to take whatever steps are necessary to ensure students and employees a healthy and safe environment in which to learn and work.

A copy of the AHERA management plan for the Attleboro School District is available for review in the facilities office and the individual school offices during regular school hours. Any inquiries regarding asbestos containing materials in our schools should be directed to our AHERA Designated Person Jason Parenteau, who can be reached at the Facilities Office and at jason.parenteau@sodexo.com or (508) 226-1169 with any questions.

APPENDIX G SAMPLE ANALYSIS REPORTS

Analysis Report prepared for

AEC Laboratories, LLC

Report Date: 8/14/2017

Project Name: Stadley Elementary Project #: 424071 21464

SanAir ID#: 17030160



NVLAP LAB CODE 200870-0









1551 Oakbridge Drive, Suite B, Powhatan, VA 23139 804.897.1177 Toll Free: 888.895.1177 Fax: 804.897.0070 Web: http://www.sanair.com E-mail: iaq@sanair.com

AEC Laboratories, LLC 814 Broad Street Weymouth, MA 02189

August 14, 2017

SanAir ID # 17030160

Project Name: Stadley Elementary Project Number: 424071 21464

Dear G. Hatch,

We at SanAir would like to thank you for the work you recently submitted. The 18 sample(s) were received on Monday, August 07, 2017 via FedEx. The final report(s) is enclosed for the following sample(s): 080517-01A, 080517-01B, 080517-02A, 080517-02B, 080517-03A, 080517-03B, 080517-04A, 080517-04B, 080517-05A, 080517-05B, 080517-06A, 080517-06B, 080517-07A, 080517-07B, 080517-08A, 080517-08B, 080517-09A, 080517-09B.

These results only pertain to this job and should not be used in the interpretation of any other job. This report is only complete in its entirety. Refer to the listing below of the pages included in a complete final report.

Sincerely,

Sandra Sobrino

Asbestos & Materials Laboratory Manager

andra Sobiino

SanAir Technologies Laboratory

Final Report Includes:

- Cover Letter

- Analysis Pages

- Disclaimers and Additional Information

sample conditions:

18 sample(s) in Good condition

1551 Oakbridge Drive, Suite B, Powhatan, VA 23139 804.897.1177 Toll Free: 888.895.1177 Fax: 804.897.0070

SanAir ID Number

17030160

FINAL REPORT

Name: AEC Laboratories, LLC Address:

814 Broad Street Weymouth, MA 02189 Project Number:

424071 21464

P.O. Number: Project Name:

Stadley Elementary

Collected Date: 8/2/2017

Received Date: 8/7/2017 9:35:00 AM Report Date: 8/14/2017 3:53:08 PM Analyst: Wilson, Johnathan

Asbestos Bulk PLM EPA 600/R-93/116

| | Stereoscopic | <u>Components</u> | | Asbestos |
|---------------------------------|--------------|-------------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-01A / 17030160-001 | White | 60% Cellulose | 20% Other | None Detected |
| Pavillion 2' X 2' Layer Ceiling | Fibrous | 20% Glass | | |
| Tile | Homogeneous | | | |

| | Stereoscopic | Compo | nents | Asbestos |
|---------------------------------|--------------|---------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-01B / 17030160-002 | White | 60% Cellulose | 20% Other | None Detected |
| Pavillion 2' X 2' Layer Ceiling | Fibrous | 20% Glass | | |
| Tile | Homogeneous | | | |

| | Stereoscopic | Comp | oonents . | Asbestos |
|---|------------------------------------|-----------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-02A / 17030160-003 Pavillion 4" Cove Base | Grey Non-Fibrous Homogeneous | | 100% Other | None Detected |

| | Stereoscopic | <u>Com</u> | ponents | Asbestos |
|---|---------------------|------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-02B / 17030160-004 Pavillion 4" Cove Base | Grey Non-Fibrous | | 100% Other | None Detected |
| Tavilian I cove base | Homogeneous | | | |

| | Stereoscopic | Com | <u>ponents</u> | Asbestos |
|---|-----------------------------------|-----------|----------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-03A / 17030160-005 Pavillion Mastic | Tan Non-Fibrous Homogeneous | | 100% Other | None Detected |

| | Stereoscopic | Compon | ents ents | Asbestos |
|---|-----------------------------------|-----------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-03B / 17030160-006 Pavillion Mastic | Tan Non-Fibrous Homogeneous | | 100% Other | None Detected |

| | Stereoscopic | <u>Com</u> | <u>ponents</u> | Asbestos |
|-------------------------------|--------------|------------|----------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-04A / 17030160-007 | Blue | | 100% Other | None Detected |
| Room 10 At Entry 4" Cove Base | Non-Fibrous | | | |
| | Homogeneous | | | |

Certification

Analyst:

Date: 8/14/2017 Analysis Date: 8/14/2017

Approved Signatory: Sandra Abbiing.
Page 3 of 7

1551 Oakbridge Drive, Suite B, Powhatan, VA 23139 804.897.1177 Toll Free: 888.895.1177 Fax: 804.897.0070

SanAir ID Number

17030160

FINAL REPORT

Name: AEC Laboratories, LLC Address:

814 Broad Street Weymouth, MA 02189 Project Number:

424071 21464

P.O. Number: Project Name:

Stadley Elementary

Collected Date: 8/2/2017

Received Date: 8/7/2017 9:35:00 AM Report Date: 8/14/2017 3:53:08 PM **Analyst:** Wilson, Johnathan

Asbestos Bulk PLM EPA 600/R-93/116

| | Stereoscopic | <u>Components</u> | | Asbestos |
|-------------------------------|--------------|-------------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-04B / 17030160-008 | Blue | | 100% Other | None Detected |
| Room 11 At Entry 4" Cove Base | Non-Fibrous | | | |
| | Homogeneous | | | |

| | Stereoscopic | Compo | onents en | Asbestos |
|--|--------------------------------------|--------------|---|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-05A / 17030160-009 Room 10 At Entry Mastic | Yellow Non-Fibrous Homogeneous | 2% Cellulose | 98% Other | None Detected |

| | Stereoscopic | Compone | ents ents | Asbestos |
|--|--------------------------------------|--------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-05B / 17030160-010 Room 10 At Entry Mastic | Yellow Non-Fibrous Homogeneous | 2% Cellulose | 98% Other | None Detected |

| | Stereoscopic | <u>Components</u> | | Asbestos |
|---|-----------------------------------|-------------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-06A / 17030160-011 Pavillion Tectum Ceiling | Various Fibrous Homogeneous | 85% Cellulose | 15% Other | None Detected |

| | Stereoscopic | Compone | ents ents | Asbestos |
|---|-----------------------------------|---------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-06B / 17030160-012 Pavillion Tectum Ceiling | Various Fibrous Homogeneous | 85% Cellulose | 15% Other | None Detected |

| | Stereoscopic <u>Components</u> | | | Asbestos |
|---|-------------------------------------|----------------------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-07A / 17030160-013 Kitchen Sheetrock Ceiling Tile | White Non-Fibrous Homogeneous | 15% Cellulose 10% Glass | 75% Other | None Detected |

| | Stereoscopic | Compo | <u>nents</u> | Asbestos |
|---|-------------------------------------|----------------------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-07B / 17030160-014 Kitchen Sheetrock Ceiling Tile | White Non-Fibrous Homogeneous | 15% Cellulose 10% Glass | 75% Other | None Detected |

Certification

Analyst:

Analysis Date: 8/14/2017

Approved Signatory: Sandra Sobient.
Page 4 Date: 8/14/2017

1551 Oakbridge Drive, Suite B, Powhatan, VA 23139 804.897.1177 Toll Free: 888.895.1177 Fax: 804.897.0070

SanAir ID Number

17030160

FINAL REPORT

Name: AEC Laboratories, LLC Address: 814 Broad Street

Weymouth, MA 02189

Project Number: 424071 21464

P.O. Number:

Project Name: Stadley Elementary

Collected Date: 8/2/2017

Received Date: 8/7/2017 9:35:00 AM **Report Date:** 8/14/2017 3:53:08 PM Analyst: Wilson, Johnathan

Asbestos Bulk PLM EPA 600/R-93/116

| | Stereoscopic | Compone | ents ents | Asbestos |
|---------------------------|--------------|---------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-08A / 17030160-015 | White | 15% Cellulose | 75% Other | None Detected |
| Storage Rm 3 At Art Rm | Non-Fibrous | 10% Glass | | |
| Sheetrock Wall | Homogeneous | | | |

| | Stereoscopic | Compo | nents . | Asbestos |
|---------------------------|--------------|---------------|---------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-08B / 17030160-016 | White | 15% Cellulose | 75% Other | None Detected |
| Janitor Closet At Art Rm | Non-Fibrous | 10% Glass | | |
| Sheetrock Wall | Homogeneous | | | |

| | Stereoscopic | oscopic <u>Components</u> | | scopic Components | Asbestos |
|------------------------------|--------------|---------------------------|---------------|-------------------|----------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers | |
| 080517-09A / 17030160-017 | White | | 100% Other | None Detected | |
| Storage Rm 3 At Art Rm Joint | Non-Fibrous | | | | |
| Compound | Homogeneous | | | | |

| | Stereoscopic | <u>Com</u> | <u>ponents</u> | Asbestos |
|--------------------------------|--------------|------------|----------------|---------------|
| SanAir ID / Description | Appearance | % Fibrous | % Non-Fibrous | Fibers |
| 080517-09B / 17030160-018 | White | | 100% Other | None Detected |
| Janitor Closet At Art Rm Joint | Non-Fibrous | | | |
| Compound | Homogeneous | | | |

Certification

Analyst:

Analysis Date: 8/14/2017

Approved Signatory: Sandra Abbiin
Page Date: 8/14/2017

Disclaimer

The final report cannot be reproduced, except in full, without written authorization from SanAir. Fibers smaller than 5 microns cannot be seen with this method due to scope limitations. The accuracy of the results is dependent upon the clients sampling procedure and information provided to the laboratory by the client. SanAir assumes no responsibility for the sampling procedure and will provide evaluation reports based solely on the sample and information provided by the client. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government.

For NY state samples, method EPA 600/M4-82-020 is performed.

Polarized- light microscopy is not consistently reliable in detecting asbestos in floor covering and similar non-friable organically bound materials. Quantitative transmission electron microscopy is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos containing.

NY ELAP lab ID 11983

| (0)(0) | AEC Laboratories, LLC 814 Broad Street Weymouth, MA 02189 Phone: 781-337-0567 Fax: 781-337-0986 abreports@americanenviron.com | □ PCB AEC Laboratories ID: 472pc, 21 46 Special Instructions: | SAMPLE DESCRIPTION OUS Area Type J'EL TAN CONE DASE WASTER COVE DASE WASTER COVE DASE TECTUM CEINE TO Shorts of want | SG 8/7/17 9:35cm |
|--------|--|---|--|------------------|
| | Date/Time: All But 2017 Folex Date/Time: All 2017 Folex Date/Time: All 2017 Folex Date/Time: All Broad St Weymouth, MA 02189 Project # 12407 | op Cualitative Point Count NOB Prep TEM Chat 124 Hour 148 Hour 3 Day 155 Day Verbal Results: V/N Cell #: CanAil | Pavillion Reem 10 pt entry Reem 10 Reim 10 Rei | |
| | Received by: Continue Received by: Children Received by: Received by: Client Name: American Environmental Consultants American Client: Att ober Public Sproject: Standard Project: Standard Received Broj. Address: Standard Received Broj. Address Broj. Addres | Analysis: MPLM Desitive Stop Turnaround Time: DRUSH D24 Sampled By: Date: Sampled By: | 1.48 ID FIELD ID | |

AEC American Bulk COC Version 1.1 (6/06/13)

| Received by: Received by: Received by: Received by: Client Name: American Environmental Client: Project: Proj. Address: | etary | AEC Laboratories, LLC 814 Broad Street Weymouth, MA 02189 Phone: 781-337-0567 Fax: 781-337-0986 labreports@americanenviron.com Page 1 of 1 BULK SAMPLE CHAIN OF CUSTODY |
|---|--|---|
| Analysis: PLM Positive Stop | Qualitative Point Count NOB Prep TEM Chat | PCB AEC Laboratories ID: |
| Turnaround Time: ☐RUSH ☐24 H | our 🗌 48 Hour 🔲 3 Day 🗡 5 Day | 424 21464 |
| Sampled By: | Verbal Results: Y\N |) Special Instructions: |
| Date: 8 21 | Cell #: | · |
| Results to (PM): 6. Hattah | Name: | Homogen- Material |
| LAB ID FIELD ID | LOCATION | Homogen- Material SAMPLE DESCRIPTION ous Area Type |
| 410- 14080 | Pavillion | 2x2 lavore cailor tile |
| 815- | | |
| A20- | 1 | H' gray con Lase |
| <i>A€</i> 0− | | |
| 4800 | | MASTO |
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| 420- | Paris 10 | Mastiz |
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| 430- | farillion & | Tectum Ceilme |
| ~0(B) | | |
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| 3 013 | SAMPOL CLOSE AL HILD KUI | |
| | | |
| | | |



EMSL Order: 131804560 Customer ID: AMEN62 Customer PO: 311274

Project ID:

 Attention:
 Greg Hatch
 Phone:
 (508) 369-7657

 TRC Solutions
 Fax:
 (781) 337-0986

814 Broad Street Received Date: 07/24/2018 10:12 AM

Weymouth, MA 02189 Analysis Date: 07/24/2018
Collected Date: 07/23/2018

Project: 311274 / 24015 / Attleboro School Dept / A. Irvin Studley Elementary School - 299 Rathbon Willard Dr,

Attleboro, MA

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

| | | | Non-A | sbestos | <u>Asbestos</u> |
|----------------|--|----------------------|-----------|--------------------------|-----------------|
| Sample | Description | Appearance | % Fibrous | % Non-Fibrous | % Type |
| 72318-1A | Classroom #8 - Lt Tan Floor Tile | Beige Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0001 | | Homogeneous | | | |
| 72318-1B | Classroom #8 - Lt Tan Floor Tile | Beige Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0002 | | Homogeneous | | | |
| 72318-1C | Classroom #8 - Lt Tan Floor Tile | Beige Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0003 | | Homogeneous | | | |
| 72318-2A | Classroom #8 - Black Mastic Under Lt Tan | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0004 | Floor Tile | Homogeneous | | | |
| 72318-2B | Classroom #8 - Black Mastic Under Lt Tan | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0005 | Floor Tile | Homogeneous | | | |
| 72318-2C | Classroom #8 - Black Mastic Under Lt Tan | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0006 | Floor Tile | Homogeneous | | | |
| 72318-3A | Classroom #8 - Lt Blue Floor Tile | Gray Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0007 | | Homogeneous | | | |
| 72318-3B | Classroom #8 - Lt Blue Floor Tile | Gray Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0008 | | Homogeneous | | | |
| 72318-3C | Classroom #8 - Lt Blue Floor Tile | Gray Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0009 | | Homogeneous | | | |
| 72318-4A | Classroom #8 - Black Mastic Under Lt Blue | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0010 | Floor Tile | Homogeneous | | | |
| 72318-4B | Classroom #8 - Black Mastic Under Lt Blue | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0011 | Floor Tile | Homogeneous | | | |
| 72318-4C | Classroom #8 - Black Mastic Under Lt Blue | Black Non-Fibrous | | 100% Non-fibrous (Other) | None Detected |
| 131804560-0012 | Floor Tile | Homogeneous | | | |

Initial report from: 07/24/2018 14:14:28



EMSL Order: 131804560 Customer ID: AMEN62 Customer PO: 311274

Project ID:

|--|

Elizabeth Stutts (12)

Steve Grise, Laboratory Manager or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. 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 relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility of the client. All samples received in acceptable condition unless otherwise noted. 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. EMSL recommends gravimetric reduction for all non-friable organically bound materials prior to analysis. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Woburn, MA NVLAP Lab Code 101147-0, CT PH-0315, MA AA000188, RI AAL-139, VT AL998919, Maine Bulk Asbestos LB-0039

Initial report from: 07/24/2018 14:14:28

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131804560

Industrial Hygiene Laboratory 21 Griffin Road North Windsor, CT 06095 (860) 298-6308



CLIENT: Attleboro School Department

Lab Log #: 0055894

Project #: 413225.0002.0000

Date Received: 10/29/2020 Date Analyzed: 11/02/2020

Site: Studley Elementary School, 299 Rathbun Willard Drive, Attleboro, MA

POLARIZED LIGHT MICROSCOPY by EPA 600/R-93/116

| Sample No. | Color | Homogenous | Multi- Layered | Layer No. | Other Matrix Materials | Asbestos % | Asbestos Type |
|------------|--------------------------------|------------|-------------------|-----------|---------------------------|---------------|------------------|
| Stud-01A | Grey (2" ceramic tile grout) | Yes | No | | | ND | None |
| Stud-01B | Grey (2" ceramic tile grout) | Yes | No | | | ND | None |
| Stud-02A | Grey (2" ceramic tile mud set) | Yes | No | | | ND | None |
| Stud-02B | Grey (2" ceramic tile mud set) | Yes | No | | | ND | None |
| Stud-03A | Pink (12x12 vinyl floor tile) | Yes | No | | | ND | None |
| Stud-03B | Pink (12x12 vinyl floor tile) | Yes | No | | | ND | None |
| Stud-04A | Yellow (mastic) | Yes | No | | | ND | None |
| Stud-04B | Yellow (mastic) | Yes | No | | | ND | None |
| Stud-05A | Yellow (carpet mastic) | Yes | No | | | ND | None |
| Stud-05B | Yellow (carpet mastic) | Yes | No | | | ND | None |
| Stud-06A | Brown (9x9 vinyl floor tile) | Yes | No | | | 10% | Chrysotile |
| Stud-06B | | | | | | NA/PS | |
| Stud-07A | Black (mastic) | Yes | No | | | 20% | Chrysotile |
| Stud-07B | | | | | | NA/PS | |
| Stud-08A | Blue (12x12 vinyl floor tile) | Yes | No | | | ND | None |
| Stud-08B | Blue (12x12 vinyl floor tile) | Yes | No | | | ND | None |
| Stud-09A | Colorless (mastic) | Yes | No | | | ND | None |
| Stud-09B | Colorless (mastic) | Yes | No | | | ND | None |

Industrial Hygiene Laboratory 21 Griffin Road North Windsor, CT 06095 (860) 298-6308



POLARIZED LIGHT MICROSCOPY by EPA 600/R-93/116

| Sample No. | Color | Homogenous | Multi- Layered | Layer No. | Other Matrix Materials | Asbestos % | Asbestos Type |
|------------|----------------------------|------------|-------------------|-----------|---------------------------|---------------|------------------|
| Stud-10A | Tan (9x9 vinyl floor tile) | Yes | No | | | 5% | Chrysotile |
| Stud-10B | | | | | | NA/PS | |
| Stud-11A | Black (mastic) | Yes | No | | | 5% | Chrysotile |
| Stud-11B | | | | | | NA/PS | |

Reporting limit- asbestos present at 1%

ND - asbestos was not detected

Trace - asbestos was observed at level of less than 1%

NA/PS - Not Analyzed / Positive Stop

SNA- Sample Not Analyzed- See Chain of Custody for details

Note: Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. In those cases, EPA recommends, and certain states (e.g. NY) require, that negative results be confirmed by quantitative transmission electron microscopy.

The Laboratory at TRC follows the EPA's Interim Method for the Determination of Asbestos in Bulk Insulation 1982 (EPA 600/M4-82-020) Bulk Analysis Code 18/A01 and the EPA recommended Method for the Determination of Asbestos in Bulk Building Materials July 1993, R.L. Perkins and B.W. Harvey, (EPA/600/R-93/116) Bulk Analysis Code 18/A03, which utilize polarized light microscopy (PLM). Our analysts have completed an accredited course in asbestos identification. TRC's Laboratory is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), for Bulk Asbestos Fiber Analysis, NVLAP Code 18/A01, effective through June 30, 2021. TRC is accredited by the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC in the Industrial Hygiene Program (IHLAP) for PLM effective through October 1, 2020. Asbestos content is determined by visual estimate unless otherwise indicated. Quality Control is performed in-house on at least 10% of samples and QC data related to the samples is available upon written request from client.

This report shall not be reproduced, except in full, without the written approval of TRC. This report must not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report relates only to the items tested.

| Analyzed by: | K. Welliam Reviewed by: | | Willia / | Date Issued |
|--------------|---|--|--------------------------------|--------------------|
| | Kathleen Williamson, Laboratory Manager | | Joel Corso, Approved Signatory | 11/02/2020 |

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| TRC 814 Broad Street Weymouth, MA 02189 Phone: 781-337-0016 Fax: 781-337-0986 o: mmccaffrey@trccompan ghatch@trccompanies.com Page of Campanies.com | AMEN 62 Laboratory ID: Special Instructions: email: | SCRIPTION A | The Later of the Control of the Cont | S C C C C S S S S S S S S S S S S S S S |
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