[EARLY FEASIBILITY PHASE] REPORT TO

ARROWSTREET

APRIL 26, 2024

HAZARDOUS BUILDING MATERIALS INSPECTION
MARGARET A. NEARY ELEMENTARY SCHOOL
53 PARKERVILLE ROAD
SOUTHBOROUGH, WORCESTER COUNTY, MASSACHUSETTS

Submitted by:

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Project Number: 8404

1. INTRODUCTION

PEER Consultants, P.C. (PEER) [Asbestos Consulting Service Provider Certificate, AF66] conducted a limited, non-destructive asbestos in building materials inspection (the "Scope"), during Early Feasibility Phase, and related to the proposed Massachusetts School Building Authority (MSBA) project and Associated Work (the "Work") at the Margaret A. Neary Elementary School building (the "Building"), 53 Parkerville Road, Southborough, Worcester County, Massachusetts (the "Property").

The Scope was conducted on the following date: April 17, 2024; by MA Licensed Asbestos Inspector/Management Planner Dave Gorden [PEER Consultants, 10 Mall Road, Suite 301, Burlington, MA 01803; 781-238-8880] in general accordance with PEER's Proposal to Arrowstreet (the "Client"), dated February 4, 2024. In consideration of this proposal, and in consideration that a solution under the MSBA Modules has not yet been determined for the Building on the Property, the Client requested that PEER only allow for one day on the Property at this Early Feasibility Phase in order to perform a Scope under Task 3.1.A. (and related tasks: Task 3.2.A and Task 3.2.B).

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PEER notes that for this Early Feasibility Phase Report, and as it relates to suspect ACM Sampling, and as discussed with the Client, the intent of this specific "early feasibility phase" report was for one asbestos inspector to collect as many suspect ACM samples within the time frame of the initial day of collection as physically possible. The overall intent was not to collect (at this "early feasibility phase") suspect ACM samples according to certain regulatory requirements [refer to 454 CMR 28.13 (3)]. Specifically, 454 CMR 28.13 (3)(b)5. cites that for "miscellaneous material, in a manner sufficient to determine whether material is ACM or not ACM, a licensed inspector must collect bulk samples from each homogeneous area of friable miscellaneous material that is not assumed to be ACM." In addition, 454 CMR 28.13 (3)(b)6. cites that for "non-friable suspected ACM. if any homogeneous area of non-friable suspected ACM is not assumed to be ACM, then a licensed inspector must collect, in a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from the homogeneous area of non-friable suspected ACM that is not assumed to be ACM."

Depending on the desired solution for the Building on the Property by the MSBA and/or the Owner and/or the Architect, PEER anticipates that additional hazardous building material sampling and investigation will be necessary to achieve a "thorough" inspection under 310 CMR 7.15; and to achieve these requirements under 454 CMR 28.13.

As such, for the purposes of this Early Feasibility Phase Report, PEER considers that all "NAD" (No Asbestos Detected) shown in Table 1A below shall still be considered to be "presumed ACM", i.e., building materials that potentially contain asbestos until such a time that the material is tested and found to be non-asbestos containing. The material is "presumed" to contain asbestos unless it is demonstrated, in accordance with 454 CMR 28.00, that the presumed ACM does not contain asbestos.

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Where accessible on the date of the Scope, the interior and exterior building components associated with the Work were inspected, and initial homogeneous areas of suspect asbestos-containing materials (ACM) were visually identified and documented. The Building was "in use" and occupied during the period of the Scope. Although a reasonable effort was made to inspect accessible suspect ACM associated with the

Scope, additional suspect but un-sampled building materials may be located in inaccessible and/or concealed and/or unsafe areas on the interior (or exterior) of the Building, and also may be located in other areas of the interior (or exterior) of the Building not assessed under this limited Scope, and/or not anticipated to be included in the Work. Suspect ACM samples were collected in general accordance with the sampling protocols outlined in United States Environmental Protection Agency (EPA) Regulation 40 Code of Federal Regulations (CFR) Part 763 Subpart E 763.86, known as the Asbestos Hazard Emergency Response Act (AHERA) and 454 CMR 28.00. Suspect ACM samples were delivered to an accredited laboratory for analysis by Polarized Light Microscopy (PLM).

Please note that according to "Final Amendments to 310 CMR 7.15 U Asbestos, dated 7/12/19", the owner/operator of a facility or facility component that contains suspect (asbestos containing material) {ACM} shall, prior to conducting any demolition or renovation, employ or engage an asbestos inspector to thoroughly inspect the facility or facility component, or those parts thereof where the demolition or renovation will occur, to identify the presence, location, amount and condition of any ACM or suspect ACM and to prepare a written asbestos evaluation report. The evaluation shall identify and assess suspect ACM located in all areas that will be breached or otherwise affected by demolition or renovation activities, including, but not limited to wall cavities, areas above ceilings and under/between multiple layers of flooring.

In consideration of this information, PEER recommends that a comparison of sampled and analyzed building materials included in PEER's limited Scope be reviewed against the proposed building materials, which may be impacted by any future Work, and if necessary, in coordination with other trades, additional samples of building materials (i.e., a thorough inspection), including irreparable destructive sampling of building materials, be collected, and analyzed for asbestos, prior to the (finalization and) issuance of bid / contract documents and prior to any site work.

The Massachusetts Health and Human Services Database (the "Database") for 'Lead Safe Homes' was searched as of April 25, 2024. This Database (Lead Safe Homes 1.0) is no longer updated however it may indicate whether an address has been inspected for lead, has had any lead hazards, or has a letter of compliance (105 CMR 460.00).

The address for the Building (53 Parkerville Rd., Southborough, MA) **was not listed** in this database. The Massachusetts Childhood Lead Poisoning Prevention Program's Lead Safe Homes 2.0 database was also searched as of April 25, 2024 for lead inspection reports and compliance documents for the Building (53 Parkerville Rd., Southborough, MA), and the database reported "**no documents found**".

The Occupational Safety and Health Administration (OSHA) 29 CFR 1926.62 Subpart D, Lead, applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead by 29 CFR 1910.1025(a)(2) is covered by this standard (OSHA 29 CFR 1926.62 Subpart D, Lead). Construction work is defined as work for construction, alteration and/or repair, including painting and decorating. Construction work includes but is not limited to the following: Demolition or salvage of structures where lead or materials containing lead are present; Removal or encapsulation of materials containing lead; New construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead; Installation of products containing lead; Lead contamination/emergency cleanup; Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and Maintenance operations associated with the construction activities described in this paragraph.

The employer shall include lead in the program established to comply with the Hazard Communication Standard (HCS) (§ 1910.1200). The employer shall ensure that each employee has access to labels on containers of lead and safety data sheets, and is trained in accordance with the provisions of HCS. Where lead is present, until the employer performs an employee exposure assessment and documents that the employee performing any of the listed tasks is not exposed above the permissible exposure limit (PEL), the employer shall treat the employee as if the employee were exposed above the PEL.

Project Objective:
PEER understands that this limited hazardous building materials inspection was requested by the Facility Owner/Operator of the Margaret A. Neary Elementary School building to gather information on the potential for the presence or absence of hazardous building materials related to the Work at the existing Building on the Property, and in order to satisfy the requirements of the USEPA Regulation 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants (NESHAP).

The objective of this limited hazardous building material inspection was to inspect readily accessible constructs, finishes, and other building materials that may be affected by the proposed Work at the Building and that may contain asbestos or that may contain lead in paint.

2. GENERAL BUILDING PROJECT DESCRIPTION

Based on information within the Request for Designer Services, the Town of Southborough is a suburban town with approximately 10,400 residents located fifteen miles east of Worcester, and 25 miles west of Boston. Southborough possesses a highly skilled labor force, a diversified economy, high-wage employment, and a three-decade record of growth. Many businesses and non-profit organizations choose Southborough because of its highly educated workforce and its close proximity to rail, air, bus, and highway services. Southborough has a stop on the MBTA's Framingham/Worcester line which offers service from Worcester to Boston and the Metropolitan Boston area.

The town government is an open town meeting form of government. The five elected members of the Select Board are the town's executive officers. The Town Administrator is appointed by the Select Board and is responsible for the daily operations of the town and the supervision of town employees. The School Committee consists of five elected members and has oversight and responsibility for the school system.
The Southborough Public School District is a high performing school district. The K-8 District is comprised of three elementary schools and one middle school. Student enrollment for the 2022-2023 school year was 1,270 students as of October 1, 2022. The District's mission is to educate, inspire, and challenge. The District is centered in the core values of integrity, empathy, inclusivity, equity, perseverance, and respect.

The existing building is a structural block construction with masonry in-fill walls and exterior face brick veneer. Steel roof joists support a flat Carlisle EDPM membrane roof, which was replaced in 1990. An addition of two (2) modular classrooms occurred at the building in 2001, adding 2,744 square feet. The interior finishes include vinyl roll, vinyl asbestos tile, ceramic tile, vinyl gym flooring, and quarry tile as well as exposed concrete flooring and concrete block walls, and plaster, acoustic tile and lay-in acoustic tile (LAT) ceilings. Doors and windows are original construction. There has been no significant modification from the original design at the building. An upgrade of the HVAC equipment, generator, and electrical system was completed in 2007. This upgrade also included new clocks and a communication system. A voice over IP phone system was installed in 2018.

3. FIELD ACTIVITIES

3.1 Asbestos Inspection

The asbestos inspection was completed by Mr. Dave Gorden, Massachusetts Department of Labor Standards (DLS) licensed asbestos inspector (AI 900459). Multiple samples of suspect building materials were collected to meet the requirements of the sampling protocols established in the USEPA Regulation 40 CFR Part 763 Subpart E 763.86, known as the AHERA, 454 CMR 28.00, and the OSHA regulations. A summary of inspection activities is provided below.

3.1.1 Visual Assessment

Asbestos inspection activities were initiated with limited, visual observation of the interior and exterior spaces of the Building associated with the proposed Work to identify homogeneous areas of suspect ACM. A homogeneous area is an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in size, color and texture and was applied at approximately the same time. In general, a homogeneous area may consist of building materials that appear similar throughout in terms of size, color, and texture with consideration given to the suspected date of application. The interior and exterior assessment was conducted in visually accessible areas of the interior and exterior portion of the Building proposed for renovation / demolition related to the proposed Work.

3.1.2 Physical Assessment

A physical assessment of each homogeneous area of suspect ACM was conducted to assess the friability and condition of the materials. A friable asbestos material is defined by the EPA as “any material containing more than 1 percent asbestos as determined using the method specified in Appendix E, subpart E, 40 CFR part 763, section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure”.

MADEP defines a Friable Asbestos-Containing Material, as a material, “when dry, can be crumbled, shattered, pulverized or reduced to powder by hand pressure or any non-friable ACM that has been subjected to sanding, grinding, cutting, or abrading or has been crumbled, shattered or pulverized by mechanical means such as, but not limited to, the use of excavators, bulldozers, heavy equipment, or power and/or hand tools”.

Friability was assessed by physically touching suspect materials. If any **friable** building materials were determined by the laboratory to be asbestos containing, these materials may have been classified into one of the three following condition categories by the asbestos inspector:

- “Good” condition (G); material with no visible damage or deterioration; or showing only very limited damage or deterioration.

- “Damaged” condition (D); materials with greater than 1% although less than 10% distributed damage or less than 25% localized damage. Damage is determined when 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; or damage to jacketing or coatings; and

- "Significantly Damaged" condition (SD); materials where damage impacts at least 10% of a localized subject surface area or if the damage is evenly distributed representing an area of at least 25% of the subject surface area.

3.1.3 Asbestos - Sample Collection

Based on results of the visual observations of suspect building materials, bulk samples of suspect ACM were collected in general accordance with USEPA AHERA (and 454 CMR 28.00) sampling protocols. Samples of suspect building materials were collected from randomly selected locations in each homogeneous area with the access assistance of representatives from Margaret A. Neary Elementary School, the Town of Southborough, and the Client in order to facilitate the sampling of suspect building materials that may be disturbed by the future renovation / demolition activities related to the proposed Work. Bulk samples were collected using wet methods as applicable to reduce the potential for fiber release. Samples were placed in sealable plastic containers, labeled with unique sample numbers using an indelible marker, and appropriate chain-of-custody documentation was completed for the samples, prior to delivering and then relinquishing the samples to the analytical laboratory.

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PEER collected approximately 90 bulk samples from 41 discrete, homogeneous areas of suspect ACM associated with the interior and exterior of the Building on the Property. The suspect ACM included: *glazing putty, coating, acoustical wall tile, resilient floor tile, mastic, cement board, mortar, cementitious material, frame caulk, coating, concrete masonry units, other caulk, cove base, acoustical ceiling tile, gypsum wall board, joint compound / joint tape, sealant, canvas, brick, concrete,*

The selection of sample locations and frequency of sampling were based on PEER's observations and the assumption that similar materials in the same area are homogeneous in content. PEER did not collect samples from suspect ACM associated with any other portions of the Building or areas on the Property, not specifically identified in the chain of custody (COC) included in Attachment A. However, homogeneous areas of suspected ACM may extend into other portions of the Building beyond those areas in which ACM were sampled, and beyond areas which may have been included in the Scope and the proposed Work at this phase of the project. A summary of suspect ACM samples collected during the inspection is included as Table 1A. An EMSL Analytical, Inc. (EMSL) laboratory Test Report and associated COCs for the suspect ACM is included as Attachment A of this Report.

3.1.4 Asbestos - Sample Analysis

Bulk samples of suspected ACM were submitted under COC to EMSL of Woburn, Massachusetts for analysis by PLM coupled with dispersion staining techniques per EPA methodology EPA 600/R-93/116 and/or EPA 600/M4-82-020 "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116, July 1993). The percentage of asbestos, where applicable, was determined by microscopic visual estimation or point counting.

OSHA and EPA define ACM as a material which contains greater than 1% asbestos by qualitative or quantitative analysis techniques. MADEP defines ACM as "any material containing 1% or more asbestos

as determined by a laboratory using protocols set forth in the Method for the Determination of Asbestos in Bulk Building Materials found in EPA report EPA/600/R-93/116, or another method as directed by the Department". The EPA NESHAP requires quantitative analysis, commonly referred to as a "point count," for all qualitative analysis results when asbestos is detected in concentrations <1% to 10%. However, under common practice, qualitative results greater than or equal to 2% and <10% are often accepted to be ACM.

If the laboratory determined that the building materials contained <1% asbestos, depending on the building material type, the samples may have been re-analyzed via the Asbestos Analysis of Non-Friable Organically Bound Materials by Transmission Electron Microscopy (TEM) via "Method for the Determination of Asbestos in Bulk Building Materials" (EPA/600/R-93/116 Section 2.5.5.1) or Quantitation using the 400 Point Count Procedure.

This reanalysis was not applicable to these ACM sample analyses.

In general, except if and where noted on the "Special Instructions and/or Regulatory Requirements" section of the COC, or the "Positive Stop – Clearly Identify Homogeneous Areas" section of the COC for the specific sampling date, the laboratory was instructed to analyze all samples from each homogeneous area. The analysts described below were overseen by Mr. Steve Grise, Laboratory Manager. EMSL is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP Accreditation No. 101147-0).

At the Building, for samples A-1 through A-63, Mr. John McCarthy, Mr. Kevin McKenzie, and Ms. Ava Kopellas; Analysts, provided the asbestos analytical services for EMSL. The samples (A-1 through A-63) were kept under custody by PEER until they were delivered to and relinquished to EMSL on April 19, 2024. Sample results for A-1 through A-63 were received electronically by PEER on April 23, 2024.

3.2 Lead in Paint Inspection

The limited lead in paint and lead in coating inspection on interior building materials was completed by Mr. Dave Gorden, Massachusetts Lead Safe Renovator Supervisor (22-4561-374-251190). PEER collected representative homogeneous paint or coating samples on substrates found on the interior of the Building on the Property that may be subject to disturbance during the proposed Work. Homogenous paints / coatings may be defined as areas of similar paint or coating history, such as color, consistency, and location.

3.2.1 Lead in Paint – Sample Collection

The selection of sample locations and frequency of sampling were based on PEER's observations, the assumption that similar painted materials in the same area on the same surface are homogeneous in content.

On April 17, 2024, PEER collected three paint/coating samples. These paint / coating samples were collected from building materials associated with the proposed Work on the interior of the Building on the Property by swabbing the surface with a 3M™ LeadCheck™ Swab.

PEER understands that EPA has been informed that, as of October 2023, 3M has suspended the production and sale of 3M™ LeadCheck™ test kits. Consumers may continue to use 3M™ LeadCheck™ test kits they may already have on hand. EPA will continue to recognize the 3M™ LeadCheck™ test kit, or any already recognized test kit, should it be transferred to another entity, provided that the formulation does not change and no new test kit that meets both response criteria is recognized.

The 3M™ LeadCheck™ Swab has no shelf life and EPA recognizes that when used by a Certified Renovator, the 3M™ LeadCheck™ lead test kit can reliably determine that regulated lead-based paint is not present on wood, ferrous metal (alloys that contain iron), or drywall and plaster surfaces. In Massachusetts.

EPA recognizes that when used by trained professionals, the Commonwealth of Massachusetts lead test kit can reliably determine that regulated lead-based paint is not present on drywall and plaster; it is not recognized for use on wood and ferrous metal (alloys that contain iron) surfaces.

The Swab immediately provides an accurate but qualitative (yes/no) confirmation of the presence of lead in paint, i.e., “red means lead.” According to the manufacturer, 3M™ LeadCheck™ Swabs reliably detect lead in paints at 0.5% (5,000 ppm), and 3M™ LeadCheck™ Swabs may indicate lead in some paint films as low as 0.06% (600 ppm).

Please note that lead may still occur in paints and coatings at the Building below the concentration that 3M™ LeadCheck™ Swabs can reliably detect lead in paints; therefore, Title 29 - Subtitle B - Chapter XVII - Part 1926 - Subpart D - § 1926.62 is made applicable to all Work associated with the Scope at the Building.

PEER did not collect samples from suspect lead in paint or lead in coatings associated with any other portions of the Building or areas on the Property, not specifically identified in Table 2A. In addition, PEER did not collect samples from areas near the Building not anticipated to be impacted by the proposed Work.

4. REGULATORY OVERVIEW

4.1 Asbestos

USEPA regulation 40 CFR 61, Subpart M, NESHAP regulates asbestos fiber emissions during renovation or demolition activities and asbestos waste disposal practices. It also requires one to thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos, including Category I and Category II nonfriable ACM.

Under NESHAP, asbestos-containing building materials are classified as Friable or Category I non-friable or Category II non-friable ACM. Friable ACM are those materials containing more that 1% asbestos that, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. Category I non-friable ACM includes packings, gaskets, resilient floor coverings and asphalt roofing products containing more than 1% asbestos. Category II non-friable ACM are any materials other than Category I materials that contain more than 1% asbestos.

Friable ACM, along with Category I and Category II non-friable ACM which is in poor condition and has become friable or which will be subjected to drilling, sanding, grinding, cutting or abrading and which

could be crushed or pulverized during anticipated renovation or demolition activities are considered regulated asbestos containing material (RACM).

In the Commonwealth of Massachusetts, asbestos activities are regulated by the Massachusetts Department of Environmental Protection (DEP) [310 CMR 7.15: Asbestos, dated July 12, 2019], and by the Massachusetts Executive Office of Labor and Workforce Development (EOLWD) under 454 CMR 28.00.

According to 310 CMR 7.15 (2)(a), 310 CMR 7.15 applies to any persons engaged in asbestos abatement activities or associated activities or actions set forth in 310 CMR 7.15(3), and to activities associated with such asbestos abatement activities, including, but not limited to, notifications, inspections, visual inspections, and recordkeeping.

According to 454 CMR 28.01 (2)(a), 454 CMR 28.00 applies to (a) all work, including construction, demolition, alteration or repair, involving any building or structure, including those owned or leased by the commonwealth or any of its political subdivisions or authorities, where such work involves the use or handling of asbestos or material containing asbestos, including the disposal of materials containing asbestos and asbestos contaminated waste. 454 CMR 28.00 also applies to asbestos training, consultation and/or analytical services including, but not limited to:

1. Asbestos inspection and hazard assessment services;
2. The preparation of asbestos project designs, asbestos project oversight and/or monitoring;
3. Asbestos training required by 454 CMR 28.00; and
4. Asbestos analysis performed in connection with any of the above services.

Massachusetts regulations require that any asbestos-related activity conducted in the Commonwealth be performed by personnel licensed by the EOLWD Division of Safety. Asbestos abatement must be performed by Massachusetts-licensed asbestos abatement contractors in accordance with a Project Design prepared by an MA-Licensed Asbestos Designer. Third-party clearance air monitoring must be conducted at the completion of abatement activities. Management Plans developed for the in-place management of asbestos-containing materials must be developed by an EOLWD-licensed Management Planner.

RACM must be removed prior to demolition activities. The owner or operator of a facility must provide DEP (and EPA) with written notification of planned removal activities at least 10 working days prior to the commencement of asbestos abatement activities. In addition, certain cities and towns, including health departments and fire departments, in the Commonwealth of Massachusetts may have additional notification requirements.

The U. S. Occupational Safety and Health Administration (OSHA) Asbestos standard for construction (29 CFR 1926.1101) regulates workplace exposure to asbestos. The OSHA standard requires that employee exposure to airborne asbestos fibers be maintained at or below 0.1 asbestos fibers per cubic centimeter of air (0.1 f/cc) as an 8-hour time weighted average (TWA) and not exceed 1.0 fibers per cubic centimeter of air (1.0 f/cc) over a 30-minute time period known as an excursion limit (EL). The TWA and EL are known as OSHA's permissible exposure limits (PELs). The OSHA standard classifies construction and maintenance activities which could disturb ACM; and specifies work practices and precautions which employers must follow when engaging in each class of regulated work.

The DLS Asbestos Program (the "Program") is responsible for the regulation of occupational asbestos exposure in Massachusetts. The Program works with employers, employees, unions, and state and local

agencies to create healthier and safer work conditions for Massachusetts workers through site visits, analytical services, and technical information. The Program aids in the coordination of OSHA, EPA, and Multi-State regulatory authorities along with the Consortium of North Eastern U.S. States (CONES) in the common goal of protecting the public from long term damage from excessive asbestos exposure.

4.2 Lead in Paint

EPA Renovation, Repair and Painting (RRP) Rule
EPA's RRP rule was published on April 22, 2008, under the authority of the Toxic Substances Control Act (TSCA). RRP was effective on April 22, 2010 and addresses lead-based paint hazards created in target housing and child-occupied facilities.

Target housing is a home or residential unit built before 1978. There are exceptions for elderly and disable persons and zero-bedroom dwellings. A child-occupied facility is a pre-1978 building that is visited regularly by the same child (under 6 years of age), for at least two different days during the week, and each visit lasts at least 3 hours. The combined weekly visits must be at least 6 hours, and the combined annual visits must be at least 60 hours.
The RRP Final Rule Requires:

- Renovators (individuals) performing work in target housing or child-occupied facilities must be trained and certified.
- Renovation firms must be certified.
- Non-Certified workers must work under and be trained on-the-job by a certified renovator.
- Lead safe work practices must be followed.
- Certified renovators must educate owners/occupants.
- Training providers must be accredited.

The requirements listed above are triggered if renovation, repair, or painting activities will disturb more than 6 square feet of interior paint or 20 square feet of exterior paint in target housing or child-occupied facilities. Please note that the RRP does not replace lead-based paint abatement regulations (40 CFR 745.223) or the OSHA Lead in Construction Standard (29 CFR 1926.62). Federally assisted target housing must address lead hazards under the U.S. Department of Housing and Urban Development (HUD) Guidelines.

Lead is a pollutant regulated by many laws administered by EPA, including the Toxic Substances Control Act (TSCA), Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X), Clean Air Act (CAA), Clean Water Act (CWA), Safe Drinking Water Act (SDWA), Resource Conservation and Recovery Act (RCRA), and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) among others. Please note that according to EPA, lead-based paint is defined by statute as paint with lead levels equal to or exceeding 1.0 milligrams per square centimeter (mg/cm^2) or 0.5% by weight (see section 302(c) of the Lead-Poisoning Prevention Act (42 U.S.C. 4822(c)) and Toxic Substances Control Act (TSCA) section 401(9) (15 U.S.C. 2681(9)).

OSHA: Lead-Based Paint (LBP) Rules
29 CFR 1926.62 Subpart D, Lead, applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry standard for lead by 29 CFR 1910.1025(a)(2) is covered by this standard (OSHA 29 CFR 1926.62 Subpart D, Lead). Construction work is defined as work for construction, alteration and/or repair, including painting

and decorating. Construction work includes but is not limited to the following: Demolition or salvage of structures where lead or materials containing lead are present; Removal or encapsulation of materials containing lead; New construction, alteration, repair, or renovation of structures, substrates, or portions thereof, that contain lead, or materials containing lead; Installation of products containing lead; Lead contamination/emergency cleanup; Transportation, disposal, storage, or containment of lead or materials containing lead on the site or location at which construction activities are performed, and Maintenance operations associated with the construction activities described in this paragraph.

The employer shall include lead in the program established to comply with the HCS (§ 1910.1200). The employer shall ensure that each employee has access to labels on containers of lead and safety data sheets, and is trained in accordance with the provisions of HCS. Where lead is present, until the employer performs an employee exposure assessment and documents that the employee performing any of the listed tasks is not exposed above the PEL, the employer shall treat the employee as if the employee were exposed above the PEL.

Commonwealth of Massachusetts LBP Rules

In the December 1, 2017 update, the Massachusetts lead law (105 CMR 460.000) requires certain actions when lead paint hazards are present in homes built before 1978 where any children under 6 years of age live. Lead paint hazards include loose lead paint, lead on moveable/impact windows, lead on accessible/mouth-able surfaces (windowsills, handrails, railing caps), and lead on friction surfaces (doors edge, door jambs, stair treads). Owners are responsible for complying with the lead law. This includes owners of rental property as well as owners living in their own single-family home.

Under 105 CMR 460.000, Dangerous Levels of Lead means the level of lead in paint, other coating, plaster, or putty which materially endangers the health of children or adults by producing a substantial and serious danger of lead poisoning.

1) When present in paint or coatings offered for sale, a dangerous level of lead shall be deemed to be 90 parts per million or greater as measured by atomic absorption spectrophotometry.
2) When present in a dried film including, but not limited to, paint, glaze, stain, varnish or other substance on any toy, furniture or other articles, or when present in paint, other coating, plaster or putty on residential surfaces, a dangerous level of lead shall be deemed to be the following:
    a. a positive reaction with a 6% to 8% sodium sulfide solution, indicative of 0.5% or more lead by dry weight; or
    b. equal to or more than 1.0 milligram of lead per square centimeter (mg/cm^2) of surface as measured on site by a mobile X-ray fluorescence analyzer; or
    c. equal to or more than 5,000 parts per million (ppm) or equal to or more than 0.5% by dry weight, as measured by atomic absorption spectrophotometry.
3) When present in a glaze or enamel on a glass, ceramic, porcelain or porcelain-coated cooking, eating or drinking utensil, or a porcelain-coated household appliance or fixture, a dangerous level of lead shall be deemed to be two (2) parts per million or greater as tested by A.S.T.M. Standard Method C 738-94(2000).

If work is to be done in areas that contain lead paint hazards in target housing, it is called deleading. Deleading must be done by people who are trained, certified, and authorized to do the work safely. Renovation is work done to repair or improve a residence if it is built before 1978. Contractors must be RRP certified to do renovations in a residence if it is built before 1978. Work that disturbs lead paint can be dangerous, and can include Painting (removing paint; sanding or scraping painted surfaces; painting

outside surfaces); Renovation/Demolition (tearing down walls or plaster; removing windows and woodwork); and Repairing (fixing plumbing or electrical systems; repairing heating or ventilation ducts).

In Massachusetts, the Childhood Lead Poisoning Prevention Program (CLPPP) was established for the prevention, screening, diagnosis, and treatment of lead poisoning, including the elimination of sources of poisoning through research and educational, epidemiologic, and clinical activities as may be necessary. CLPPP provides a range of both primary and secondary prevention services to the children of the Commonwealth of Massachusetts, their families, and others with an interest in the prevention of lead poisoning. In order to accomplish the fundamental goals of identifying lead poisoned children and ensuring that they receive medical and environmental services as well as preventing further cases of lead poisoning, CLPPP has developed linkages with a wide array of professionals and programs that provide services to children. CLPPP also provides coordinated and comprehensive nursing case management.

Commonwealth of Massachusetts Lead Safe Renovation Information
Renovation, repair, and painting work conducted for a fee in housing built before to 1978 and child-occupied facilities where more than 6 square feet of painted surface per Room is disturbed on the interior of a building, or more than 20 square feet of painted surface on the exterior of a building, must be carried out by lead-safe renovation (LSR) contractor. Licensed LSR contractors must have a trained and certified LSR supervisor on their staff. Under Massachusetts regulations, an LSR supervisor is always required to be on site while renovation work is in progress. Entities that perform renovation work (as defined in 454 CMR 22.02) must be licensed as a LSR contractor, deleading contractor, or have a contractor licensing waiver.

The presence of lead in paint during renovation and demolition activities may necessitate certain requirements under OSHA for worker protection. In addition, the presence of lead in paint in construction and demolition waste/debris, as it applies to the toxicity characteristic leaching procedure (TCLP), may serve a certain role in the selected location for the final building material disposal location, as it relates to classification as a hazardous waste or non-hazardous waste under RCRA. In addition, Massachusetts has specific transport and disposal requirements related to the characterization of waste, which contains concentrations of lead.

4.3 Management of Lead Wastes - Massachusetts

In Massachusetts, the Massachusetts Policy on the Management of Wastes from Lead Abatement, Remodeling and Renovation Activities Conducted in Households policy provides further clarification of the household hazardous waste exemption cited at 310 CMR 30.104(6) as it relates to the management of lead-based paint (LBP) waste generated from lead abatement, remodeling and renovation activities in residences. LBP waste is composed of coated building components (doors, window frames and painted woodwork), and concentrated residue from chemical and physical paint removal activities (paint chips, dust, and sludges).

This policy adds LBP waste to the household waste exemption, 310 CMR 30.104(2)(g), and is consistent with recent USEPA guidance discussed below. LBP coated building components and concentrated residues generated by residents or by contractors performing activities in residences are classified as household waste, and are therefore exempt from hazardous waste regulations. Accordingly, LBP wastes from residences may be managed as non-hazardous solid waste. However, this policy does not apply to LBP wastes generated from activities conducted in non-residential buildings or from structures (e.g., bridges,

tanks); such wastes continue to be subject to the Massachusetts Hazardous Waste Management Regulations, 310 CMR 30.000.

This policy is intended to facilitate lead abatement activities, especially in HUD-funded public housing initiatives, by reducing waste management and disposal costs while ensuring public and environmental protection. The Department's management approach mirrors the federal approach described in a July 31, 2000, memo by Elizabeth Cotsworth, Director of the Office of Solid Waste, USEPA, entitled "Regulatory Status of Waste Generated by Contractors and Residents from Lead-Based Paint Activities Conducted in Households." This memo clarifies the federal regulatory status of lead-based paint waste generated as a result of lead abatement, renovation and remodeling activities in homes and other residences.

Specifically, EPA clarifies that the "household waste" exemption, which has been historically limited to residents, is applicable to waste generated by contractors conducting lead abatement, remodeling and renovation activities in residences, thereby allowing both contractors and residents to manage LBP waste as non-hazardous solid waste. The memo further states that LBP waste can be discarded in a municipal solid waste landfill or a municipal solid waste combustor. Finally, the memo expands the definition of "residence" to include not only single-family homes, multifamily homes, apartment buildings, but public and military housing as well. By this policy, the Department adopts the guidance provided in EPA's July 31, 2000, interpretive memo and strongly recommends that residents and contractors comply with the "Best Management Practices" (BMPs) for removing, packaging and disposing of lead abatement wastes specifically described in the memorandum.

4.4 TCLP Lead in Paint and Substrates

Since the Building is currently used as the Margaret A. Neary Elementary School, an elementary education facility for the Town of Southborough, it may be important to note that the presence of lead in paint and its associated leachability in the construction and demolition waste/debris waste stream may serve a certain role in the selected location for the final building material disposal location, as it relates to determining whether a "solid waste" exhibits the characteristics of "hazardous waste" or non-hazardous waste under RCRA.

Solid wastes containing lead are subject to RCRA regulation and 310 CMR 30.00. If the amount of lead that leaches from a waste using the toxicity characteristic leaching procedure (TCLP) exceeds the lead toxicity characteristic (TC) limit of 5 mg/L, the solid waste must be managed as a TC hazardous waste (unless otherwise excluded, as per Paragraph 4.3, above).

A solid waste (except manufactured gas plant waste) exhibits the characteristic of toxicity if, using the Toxicity Characteristic Leaching Procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW–846, as incorporated by reference in § 260.11 of this chapter, the extract from a representative sample of the waste contains any of the contaminants listed in Table 1 of that publication at the concentration equal to or greater than the respective value given in that that table.

For this analysis, if the TCLP result for lead is equal to or greater than 5 milligrams per Liter (mg/L), the waste stream may be considered a hazardous waste that must be disposed of at a hazardous waste landfill.

Depending on the desired solution for the Building on the Property by the MSBA and/or the Owner and/or the Architect, PEER anticipates that TCLP lead in paint and substrates analytical testing may be completed for future phases.

5. FINDINGS

5.1 Asbestos-Containing Material Classifications

As discussed in Section 4.1, ACMs, if identified during the Inspection were classified on Table 1B as; RACM ("friable"), Category I non-friable ACM, or Category II non-friable ACM. These categories are shown on Table 1B for each identified material containing asbestos. The classifications are used because ACMs can vary in the relative hazard these materials present; and based on their characteristics when disturbed by varying renovation or demolition techniques. For this reason, state and federal regulations manage these categories differently when regulating disturbance and abatement activities.

PACM includes building materials that potentially contain asbestos until such a time that the material is tested and found to be non-asbestos containing. The material is "presumed" to contain asbestos unless it is demonstrated, in accordance with 454 CMR 28.00, that PACM does not contain asbestos.

5.1.1 Regulated Asbestos-Containing Material (RACM)

RACM was identified associated with the proposed Work at the Building (based on the material's expectation to become friable during any disturbance), as per Table 1B. If renovation or demolition will disturb RACM, it must be removed prior to disturbance. All RACM must be removed prior to the demolition of a building. Removal must be performed by Massachusetts licensed Asbestos Contractors using accredited and Massachusetts licensed personnel.

5.1.2 Category I Non-Friable ACM

At the Building, Category I non-friable asbestos-containing material (including *resilient floor tiles*) was detected associated with the sampled building materials as part of the proposed Work at the Building on the Property.

5.1.3 Category II Non-Friable ACM

At the Building, Category II non-friable asbestos-containing material (including *glazing putty, mastic, coating, cementitious mudded thermal system insulation, joint compound / joint tape, cement board*) was detected associated with the sampled building materials as part of the proposed Work at the Building on the Property.

5.1.4 Asbestos Management Recommendations

Please note that according to 454 CMR 28.00, an asbestos project design is a site-specific written work plan describing the means and methods for asbestos removal, enclosure, encapsulation or repair projects that exceed three linear or three square feet of asbestos containing material in facilities ***(required for facilities subject to AHERA).***

In addition, according to 454 CMR 28.00, except as mandated by AHERA for Asbestos Response Actions conducted in school facilities, the preparation of an asbestos project design *is recommended*, but not required by 454 CMR 28.00.

Under OSHA and EPA regulations, any employee or contractor working in proximity to asbestos containing materials at the building must be made aware of the asbestos inspection and its limitations, and provided a copy of this Inspection Report prior to commencing renovation/demolition activities. If previously inaccessible suspected ACM is discovered during renovation or demolition activities, disturbance work should immediately stop, until representative bulk samples can be collected by a licensed asbestos inspector and analytical laboratory results are available to render a determination regarding asbestos content within the material discovered.

Therefore, an asbestos project design is **REQUIRED** prior to the Renovation/Demolition Work at the Margaret A. Neary Elementary School and All Other Associated Work.

5.1.5 Data Gaps - Asbestos

As part of this Report, PEER understands that there may be areas and building materials within the interior (or the exterior) of the Building, which may become impacted by or become part of the proposed Work, or a future proposed Work, that:

- may have been covered, hidden, or otherwise not visible,
- may not have been safely accessible (as determined by PEER),
- may not have been included in the Architect's or Engineer's scope of work,
- may not have been included in PEER's limited Scope,
- may have been modified, removed, or eliminated from PEER's limited Scope by the Architect, Engineer, Owner, or Others after PEER's proposal date(s); and either prior to the date of, or during the date of the hazardous building material sampling investigation event,
- has yet to be evaluated as part of this Early Feasibility phase for the project site,
- may have been added to the Building after PEER's April 17, 2024 limited hazardous building materials investigation,
- would have required irreparable, destructive sampling (which may have impacted the historical integrity, structural integrity, or impact the health and safety of the Inspector, occupants, visitors, or workers present or anticipated to be present after the April 17, 2024 building material sampling event, and/or for any other reason (as determined by PEER).

In general, PEER recommends that a comparison of sampled and analyzed building materials (as per Table 1A) be reviewed by the Facility Owner/Operator, Architect/Engineer, General Contractor, Asbestos Contractor, and/or Others (together, the "Parties") against the building materials which may become impacted by the proposed Work, and if determined to be necessary by the Parties, in coordination with other trades, additional samples of building materials, including irreparable destructive sampling of building materials, be collected, and analyzed for asbestos, prior to the (finalization and) issuance of bid documents and prior to any site work.

Table 1A

Suspect ACM Summary Table
Margaret A. Neary Elementary School
53 Parkerville Road, Southborough, Massachusetts
- - -
Collection Date (2024): April 17

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
April 17, 2024						
A-1	**2**	Glazing Putty	1	Room 22	M	Yellow-White Glazing Putty for Metal Reinforced Glass at Wood Classroom Door
A-2	**10**	Coating	2	Room 22	M	Gray Coating on Base/Bottom of 19” x 22" Metal Sink
A-3	NAD	Acoustical Wall Tile	3	Room 22	M	White Coated Gray Back 1’ x 1’ Acoustical Wall Tile with Pinpricks and Valleys on Wall
A-4A	**4**	Resilient Floor Tile	4-1	Room 22	M	Brown-Light Brown-Black-Pink Speckled/Mosaic 12” x 12” Resilient Floor Tile
A-4B	**10**	Mastic	4-2	Room 22	M	Black Mastic on Back of Resilient Floor Tile and on Concrete Floor
A-5A	**15**	Cement Board	5-1	Room 22	M	Black 6” x 60” Cement Board Window Sill with White Fibers
A-5B	NAD	Mortar	5-2	Room 22	M	Light Gray Mortar beneath Sill at Vertical Wall Surface
A-5C	NAD	Cementitious Material	5-3	Room 22	M	Light Gray-Gray Cementitious Material as Filler for Sill at Edge of Concrete Masonry Unit Wall
A-6	**3**	Glazing Putty	6	Room 22	M	Light Gray Brittle Glazing Putty for Operable Exterior Window
A-7	**2**	Glazing Putty	7	Room 22	M	Light Gray Brittle Glazing Putty for Non-Operable Window Glass Pane
A-8A	NAD	Frame Caulk	8-1	Room 22	M	Brown Firm Interior Frame Caulk for Exterior Window System
A-8B	NAD	Frame Caulk / Coating	8-2	Room 22	M	White Brittle Frame Caulk/Textured Concrete Masonry Unit Coating as Contaminant

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
A-9A	NAD	Coating	9-1	Room 22	M	White Painted White Coating on Surface of Concrete Masonry Unit
A-9B	NAD	Concrete Masonry Unit	9-2	Room 22	M	Gray Concrete Masonry Unit Wall Block with Black Grains
A-9C	NAD	Mortar	9-3	Room 22	M	Light Gray Mortar for Gray Concrete Masonry Unit at Concrete Masonry Unit to Concrete Masonry Unit Connections
A-10	NAD	Other Caulk	10	Room 22	M	White Painted White Firm Other Caulk at Concrete Masonry Unit/Concrete Masonry Unit Corner Connect
A-11	NAD	Glazing Putty	11	Room 22	M	Gray Glazing Putty for Metal Reinforced Glass at Wood for Classroom Door Exit D3
A-12	NAD	Frame Caulk	12	Room 22	M	Yellow Stained Light Gray-White Frame Caulk Solid Wood Door Frame at Closet
A-13A	NAD	Cove Base	13-1	Room 22	M	Black Hard 3.5" Wide Cove Base at Base of Fixed Cabinetry
A-13B	**2**	Mastic	13-2	Room 22	M	Yellow-Brown Mastic on 4.25" Cove Base and on Wood Cabinetry Base
A-14A	NAD	Cove Base	14-1	Room 22	M	Black Hard 4.25" Wide Cove Base at Base of Concrete Masonry Unit Wall/Fixed Closet
A-14B	**2**	Mastic	14-2	Room 22	M	Brown Mastic on 4.25" Wide Cove Base and on Concrete Masonry Unit/Wood
A-15	NAD	Acoustical Ceiling Tile	15	Room 22	M	White Coated 2’ x 2’ Acoustical Ceiling Tile with Surface Small to Medium Dots and Long Valleys (with Light Brown Interior)
A-16	**5**	Cementitious Mud	16	Room 22	M	White Cementitious Mud Wrapped on Elbow Fittings in Plenum
A-17	NAD	Acoustical Ceiling Tile	17	Hallway at Room 22	M	White Textured/Coated 2’ x 2’ Acoustical Ceiling Tile with Light Gray Interior (071300-LM-01-34)
A-18A	NAD	Gypsum Wall Board	18-1	Hallway at Room 22	M	Brown Paper Coated Light Gray Gypsum Wall Board above Hall Corridor Door/in Plenum
A-18B	**2**	Joint Compound/ Joint Tape	18-2	Hallway at Room 22	M	White Joint Compound/Joint Tape on Light Gray Gypsum Wall Board - Hall Corridor Door
A-19	NAD	Sealant	19	Hallway at Room 22	M	Red Sealant at Through Wall Pipe Run in Plenum above Corridor Door

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
A-20	NAD	Frame Caulk	20	Hallway at Room 22	M	White Hard Frame Caulk for Hallway Corridor Door at Concrete Masonry Unit
A-21	NAD	Glazing Putty	21	Hallway at Room 22	M	Light Gray Brittle Glazing Putty for 7.5x8' Corridor Door System
A-22A	NAD	Canvas	22-1	Room 22	M	Light Blue Painted 1/4" Thick Canvas Tack Board Wall of Classroom
A-22B	NAD	Mastic	22-2	Room 22	M	Brown Mastic on Back of Canvas and on Wood Backing Board Wall Classroom
A-23	**2**	Glazing Putty	1	Room 6	M	Yellow-White Glazing Putty for Metal Reinforced Glass at Wood Classroom Door
A-24	**3**	Coating	23	Room 6	M	Black Coating on Base/Bottom of 19” x 25" Metal Sink
A-25	NAD	Acoustical Wall Tile	3	Room 6	M	White Coated Gray Back 1’ x 1’ Acoustical Wall Tile with Pinpricks and Valleys on Wall
A-26A	**3**	Resilient Floor Tile	4-1	Room 6	M	Brown-Light Brown-Black-Pink Speckled/Mosaic 12” x 12” Resilient Floor Tile
A-26B	**10**	Mastic	4-2	Room 6	M	Black Mastic on Back of Resilient Floor Tile and on Concrete Floor
A-27A	**15**	Cement Board	5-1	Room 6	M	Black 6” x 60” Cement Board Window Sill with White Fibers
A-27B	NAD	Mortar	5-2	Room 6	M	Light Gray Mortar beneath Sill at Vertical Wall Surface
A-27C	NAD	Cementitious Material	5-3	Room 6	M	Light Gray-Gray Cementitious Material as Filler for Sill at Edge of Concrete Masonry Unit Wall
A-28	NAD	Glazing Putty	24	Room 6	M	Black Sticky Glazing Putty for Operable Exterior Window
A-29	**2**	Glazing Putty	7	Room 6	M	Light Gray Brittle Glazing Putty for Non-Operable Window Glass Pane
A-30A	NAD	Frame Caulk	8-1	Room 6	M	Brown Firm Interior Frame Caulk for Exterior Window System
A-30B	NAD	Frame Caulk / Coating	8-2	Room 6	M	White Brittle Frame Caulk/Textured Concrete Masonry Unit Coating as Contaminant
A-31A	NAD	Coating	9-1	Room 6	M	White Painted White Coating on Surface of Concrete Masonry Unit

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
A-31B	NAD	Concrete Masonry Unit	9-2	Room 6	M	Gray Concrete Masonry Unit Wall Block with Black Grains
A-31C	NAD	Mortar	9-3	Room 6	M	Light Gray Mortar for Gray Concrete Masonry Unit at Concrete Masonry Unit to Concrete Masonry Unit Connections
A-32	NAD	Other Caulk	10	Room 6	M	White Painted White Firm Other Caulk at Concrete Masonry Unit/Concrete Masonry Unit Corner Connect
A-33	NAD	Frame Caulk	12	Room 6	M	Yellow Stained Light Gray-White Frame Caulk Solid Wood DF at Closet
A-34A	NAD	Cove Base	13-1	Room 6	M	Black Hard 3.5" Wide Cove Base at Base of Fixed Cabinetry
A-34B	**2**	Mastic	13-2	Room 6	M	Yellow-Brown Mastic on 4.25" Cove Base and on Wood Cabinetry Base
A-35A	NAD	Cove Base	14-1	Room 6	M	Black Hard 4.25" Wide Cove Base at Base of Concrete Masonry Unit Wall/Fixed Closet
A-35B	**2**	Mastic	14-2	Room 6	M	Brown Mastic on 4.25" Wide Cove Base and on Concrete Masonry Unit/Wood
A-36	NAD	Acoustical Ceiling Tile	15	Room 6	M	White Coated 2’ x 2’ Acoustical Ceiling Tile with Surface Small to Medium Dots and Long Valleys (with Light Brown Interior)
A-37	**20**	Cementitious Mud	16	Room 6	M	White Cementitious Mud Wrapped on Elbow Fittings in Plenum
A-38	NAD	Acoustical Ceiling Tile	17	Room 6	M	White Textured/Coated 2’ x 2’ Acoustical Ceiling Tile with Light Gray Interior (071200LM2243)
A-39A	NAD	Gypsum Wall Board	18-1	Hallway at Room 6	M	Brown Paper Coated Light Gray Gypsum Wall Board above Hall Corridor Door/in Plenum
A-39B	**2**	Joint Compound/ Joint Tape	18-2	Hallway at Room 6	M	White Joint Compound/Joint Tape on Light Gray Gypsum Wall Board - Hall Corridor Door
A-40	NAD	Frame Caulk	20	Hallway at Room 6	M	White Hard for Hallway Corridor Door at Concrete Masonry Unit
A-41	**2**	Glazing Putty	21	Hallway at Room 6	M	Light Gray Brittle Glazing Putty for 10’ x 8.6' High 5 Pane Metal Reinforced Glass Door System
A-42A	NAD	Canvas	22-1	Room 6	M	Light Blue Painted 1/4" Thick Canvas Tack Board Wall of Classroom (Blue Paint)

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
A-42B	NAD	Mastic	22-2	Room 6	M	Brown Mastic on Back of Canvas and on Wood Backing Board Wall Classroom
A-43A	NAD	Resilient Floor Tile	25-1	Hallway at Room 15	M	Gray 12" x 12" Speckled Resilient Floor Tile with Light Gray/Dark Gray Specks
A-43B	**4**	Mastic	25-2	Hallway at Room 15	M	Black Mastic under Resilient Floor Tile and on Concrete Slab (Check for Yellow Mastic)
A-44A	NAD	Resilient Floor Tile	25-2	Hallway at Gym	M	Gray 12" x 12" Speckled Resilient Floor Tile with Light Gray/Dark Gray Specks
A-44B	**5**	Mastic	25-2	Hallway at Gym	M	Black Mastic under Yellow Mastic and on Concrete Slab
A-44C	NAD	Mastic	25-3	Hallway at Gym	M	Yellow Mastic on Surface of Black Mastic and on Resilient Floor Tile
A-45	NAD	Frame Caulk	26	Courtyard at Entry A1	M	Light Red Firm Frame Caulk for Double Glass Doors with Transom into Courtyard
A-46	NAD	Frame Caulk	27	Courtyard at Entry A1	M	Gray Firm Frame Caulk for 2 Door System into Courtyard - on Metal
A-47	NAD	Frame Caulk	28	Courtyard at Entry A1	M	White Hard Remnant Frame Caulk for Suspect Former Boarded Area Hallway Windows
A-48A	NAD	Glazing Putty	29-1	Courtyard at Entry A1	M	Black to Dark Gray Exterior Glazing Putty on Surfaces of Courtyard Hallway Windows
A-48B	**2**	Glazing Putty	29-2	Courtyard at Entry A1	M	Light Brown Glazing Putty on Exterior Windows for Courtyard at Hallway
A-49	Not Analyzed	Other Caulk	30	Courtyard at Entry A1	M	White-Light Brown Firm, Hard Other Caulk - Cementitious Forms at Red Brick
A-50	Not Analyzed	Other Caulk	31	Courtyard at Entry A1	M	White-Light Brown Firm, Hard Other Caulk - Cementitious Forms at Gravel Panel
A-51A	**8**	Glazing Putty	29-1	Courtyard at Entry A1	M	Black to Dark Gray Exterior Glazing Putty on Surfaces of Courtyard Hallway Windows
A-51B	**2**	Glazing Putty	29-2	Courtyard at Entry A1	M	Light Brown Glazing Putty on Exterior Windows for Courtyard at Hallway
A-52	NAD	Other Caulk	32	Courtyard at Entry A1	M	White Firm Other Caulk Coating Mortar in between Cementitious Material Panels at Roof Elev
A-53	NAD	Cementitious Panels	33	Courtyard at Entry A1	M	Yellowish-White Preformed Vertical Cementitious Panels (Fine Grained) at Roof Elevation

Sample Number	Analytical Results (%)	Building Material	Homogeneous Area	Location/ Room	Material Classification	Detailed Description
A-54	NAD	Other Caulk	34	Courtyard at Entry A1	M	White Firm, Hard Other Caulk as Horizontal Bead Preformed Panels at Brick
A-55	NAD	Cementitious Panels	35	Courtyard at Entry A1	M	White Fine Grained Cementitious Material Frame for Gravel Panel (with White Suspect Quartz)
A-56	NAD	Cementitious Material	36	Courtyard at Entry A1	M	White Fine Grained Cementitious Material Beams for Exterior Edge of Window System (with White Suspect Quartz)
A-57A	NAD	Brick	37-1	Courtyard at Entry A1	M	Red To Red Brown Brick for Exterior Envelope of Building
A-57B	NAD	Mortar	37-2	Courtyard at Entry A1	M	White Mortar in between Red to Red Brown Brick for Exterior of Build
A-58	NAD	Frame Caulk	38	Exterior Door A2	M	Red Painted Light Gray Frame Caulk - Metal at Brick - Door A2
A-59	NAD	Frame Caulk	39	Exterior	M	Black Flexible Frame Caulk for New Window Penetration "Lemieur" Office
A-60A	NAD	Brick	37-1	Exterior at B1 Door	M	Red To Red Brown Brick for Exterior Envelope of Building
A-60B	NAD	Mortar	37-2	Exterior at B1 Door	M	White Mortar in between Red to Red Brown Brick for Exterior of Build
A-61	NAD	Concrete	40	Exterior at B1 Door	M	Gray Fine to Medium Grained – with Few Coarse Grained Concrete as Foundation
A-62	NAD	Frame Caulk	41	Exterior at B1 Door	M	Red Painted Pink Firm Frame Caulk Metal Door at Brick
A-63	**2**	Glazing Putty	42	Exterior at B1 Door	M	White Brittle Glazing Putty for Side Glass Transom Panel in Door System

Notes (as may be applicable):

a. Material Classification = Surfacing (S), Thermal System Insulation (TSI), or Miscellaneous (M)
b. NAD = No Asbestos Detected.
c. As per 454 CMR 28.00 – “Homogeneous Area” is an area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in size, color and texture and was applied at approximately the same time. Homogeneous sub areas, typically materials that could not be separated by hand tools in the field, are represented by a “-“ in the above table. Materials listed in these groups are associated with other building materials within that homogeneous area.

d. LQ = Limited Quantity of building material available for sampling without eliminating building material source / Limited Quantity of building material available for sampling in order to still be classified as homogeneous / Limited Quantity of building material available for sampling due to health and safety related inaccessibility of material.

e. PEER notes that for this Early Feasibility Phase Report, and as it relates to suspect ACM Sampling, and as discussed with the Client, the intent of this specific “early feasibility phase” report was for one asbestos inspector to collect as many suspect ACM samples within the time frame of the initial day of collection as physically possible. The overall intent was not to collect (at this “early feasibility phase”) suspect ACM samples according to certain regulatory requirements [refer to 454 CMR 28.13 (3)]. Specifically, 454 CMR 28.13 (3)(b)5. cites that for “miscellaneous material, in a manner sufficient to determine whether material is ACM or not ACM, a licensed inspector must collect bulk samples from each homogeneous area of friable miscellaneous material that is not assumed to be ACM.” In addition, 454 CMR 28.13 (3)(b)6. cites that for “non-friable suspected ACM. if any homogeneous area of non-friable suspected ACM is not assumed to be ACM, then a licensed inspector must collect, in a manner sufficient to determine whether the material is ACM or not ACM, bulk samples from the homogeneous area of non-friable suspected ACM that is not assumed to be ACM.” Depending on the desired solution for the Building on the Property by the MSBA and/or the Owner and/or the Architect, PEER anticipates that additional hazardous building material sampling and investigation will be necessary to achieve a “thorough” inspection under 310 CMR 7.15; and to achieve these requirements under 454 CMR 28.13. As such, for the purposes of this Early Feasibility Phase Report, PEER considers that all “NAD” (No Asbestos Detected) shown in Table 1A below shall still be considered to be “presumed ACM”, i.e., building materials that potentially contain asbestos until such a time that the material is tested and found to be non-asbestos containing. The material is "presumed" to contain asbestos unless it is demonstrated, in accordance with 454 CMR 28.00, that the presumed ACM does not contain asbestos.

Table 1B

Identified ACM Summary Table Details
Margaret A. Neary Elementary School
53 Parkerville Road, Southborough, Massachusetts
- - -
Collection Date (2024): April 17

Sample Number	Analytical Results (%)	Building Material	Homogenous Area	Material Classification	Friable (F) / Non-Friable (NF)	Current Condition	Disturbance Potential	Estimated Quantity	Detailed Description
A-4A; A-26A	3; 4	Resilient Floor Tile {*Brown-Light Brown-Black-Pink Speckled/Mosaic 12" x 12"*}	4-1	M	CAT I NF (RACM)#	Damaged	High	See Note ①	See Note ①
A-4B; A-26B; A-43B: A-44B	4; 5; 10	Mastic {*on All Resilient Floor Tile and on Concrete*}	4-2; 25-2	M	CAT II NF (RACM)#	Good	Low	See Note ①	See Note ①
A-13B; A-14B; A-34B; A-35B	2	Mastic {*on Cove Base, Wood Cabinetry, Concrete Masonry Unit Walls, Other Wall Surfaces*}	13-2; 14-2	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ②	See Note ②
A-18B; A-39B	2	Joint Compound / Joint Tape {on *Gypsum Board Walls above and below Plenum*}	18-2	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ③	See Note ③
A-1; A-23	2	Glazing Putty {*Metal Reinforced Glass at Classroom Door*}	1	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ④	See Note ④

Sample Number	Analytical Results (%)	Building Material	Homogenous Area	Material Classification	Friable (F) / Non-Friable (NF)	Current Condition	Disturbance Potential	Estimated Quantity	Detailed Description
A-2; A-24	3; 10	Coating {*on underside of Metal Sinks*}	2; 23	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ⑤	See Note ⑤
A-16; A-37	5; 20	Mudded Thermal System Insulation {*on Fittings*}	16	M	CAT II NF (RACM)#	Damaged	High	See Note ⑥	See Note ⑥
A-5A; A-27A	15	Cement Board {*Interior Window Sills*}	5-1	M	CAT II NF (RACM)#	Damaged	Low	See Note ⑦	See Note ⑦
A-6; A-7; A-29; A-48B; A-51A; A-51B	2; 3; 8	Glazing Putty {*on Interior and Exterior of Windows at Building Envelope*}	6; 7; 29-1; 29-2	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ⑧	See Note ⑧
A-63	2	Glazing Putty {*on Interior and Exterior of Doors / Door Systems at Building Envelope*}	42	M	CAT II NF (RACM)#	Significantly Damaged	High	See Note ⑨	See Note ⑨
A-41	2	Glazing Putty {*on Both Sides of Doors / Door Systems at Building Hallways*}	21	S	CAT II NF (RACM)#	Significantly Damaged	High	See Note ⑩	See Note ⑩

Notes: Material Classification = Surfacing (S), Thermal System Insulation (TSI), or Miscellaneous (M)
Friable = Material containing more than 1% asbestos, that when dry, can be crumbled, pulverized, or reduced to powder by hand pressure
Category I Non-Friable: Asbestos containing packings, gaskets, resilient floor covering, and asphalt roofing products containing >1% asbestos…
Category II Non-Friable: Any material excluding Category I non-friable…

Assessment Category:

(1) Damaged or significantly damaged TSI ACM
(2) Damaged friable surfacing ACM
(3) Significantly damaged friable surfacing ACM
(4) Damaged or significantly damaged friable miscellaneous ACM
(5) ACBM with potential for damage
(6) ACBM with potential for significant damage
(7) Any remaining friable ACBM or friable suspected ACBM

Current Condition: Good, Damaged, Significantly Damaged;
Disturbance Potential: Contact/Vibration/Air Erosion [High (H), Moderate (M), or Low (L)]
= RACM based on anticipated disturbance during renovation/demolition.

Notes: ① through ⑩

- ✓ Asbestos abatement includes the following materials and/or building materials associated with the proposed Massachusetts School Building Authority Project at Margaret A. Neary Elementary School and All Other Associated Work, under the Base Bid, as per the above Table 1B, and as per the Project Drawings.

[PEER has inserted this section as a placeholder and notes that this section will be further developed during future phases of this project.]

All of which occurring at, in, on, beneath, and/or associated with the interior and/or envelope and/or exterior of the Building on the Property, and which is comprised of an ACM on a building component associated with the interior and/or envelope and/or exterior building environment, and any ACM debris, and/or any other asbestos containing or asbestos contaminated materials (including asbestos contaminated building materials), as per the Asbestos Project Design, and as per all Contract Documents, and as per the Project Drawings (when Project Drawings have been included with the Asbestos Project Design).

5.2 Lead in Paint Inspection Findings

On April 17, 2024, PEER collected three paint/coating samples on concrete masonry unit, or metal, or canvas building materials associated with the proposed Work on the interior of the Building on the Property by swabbing the surface with a 3M™ LeadCheck™ Swab. Lead was not detected at or above the 3M™ LeadCheck™ Swab method detectable concentration of 5,000 ppm.

Table 2A

Lead in Paint/Substrates
Margaret A. Neary Elementary School
53 Parkerville Road, Southborough, Massachusetts
- - -
Collection Date (2024): April 17

Lead Sample ID	Description	Lead (ppm)	TCLP Pb (mg/L)	Screening (Yes / No)
L-1	White paint over white textured coating on the concrete masonry unit wall in Room 22.	- -	- -	No
L-2	Red coating on a metal truss within the plenum at Room 22.	- -	- -	No
L-3	Light blue painted tack canvas board on wall within Room 22.	- -	- -	No

Notes:
In general, interior painted surfaces at the Site were observed to be intact.

PEER notes that for Sample L-3, the canvas (i.e., not the paint) became light pink in color after the use of the 3M™ LeadCheck™ Swab. PEER has noted this occurrence at other Facilities and may be a result of the canvas board manufacturing process.

"No" = Screening results did not show method detectable (greater than or equal to 5,000 ppm) concentrations of lead. Please note that 3M™ LeadCheck™ Swabs may indicate lead in some paint films as low as 0.06% (600 ppm). Please note that lead may be present within the paint/coatings at certain concentrations. Please refer to the requirements of OSHA 1926.62 Lead In Construction Standard.

"Yes" = Screening results showed method detectable (greater than or equal to 5,000 ppm) concentrations of lead. Please note that 3M™ LeadCheck™ Swabs may indicate lead in some paint films as low as 0.06% (600 ppm).

"- -" = Sample not screened using a Swab or sample not analyzed at an analytical laboratory, for the stated analysis.

5.2.1 Lead in Paint Recommendations

Considering the Work Practices which may occur during proposed renovation, repair, and painting activities at the Building on the Property, and considering the current and future use of the Building, including consideration for the occupants and visitors to continue to utilize the interior and exterior of the Building on the Property as part of the elementary school facility, **PEER recommends that the work practices associated with 454 CMR 22.00, be considered and then implemented by the Contractor or**

Contractors for any renovation, repair, and painting which may become associated with the Work at the Property.

Renovation includes the modification of any existing structure, or portion thereof, that results in the disturbance of painted surfaces. The term renovation includes, but is not limited to, the removal or modification of painted surfaces or painted components (e.g., modification of painted doors, surface preparation activity such as sanding, scraping, or other such activities that may generate paint dust); the removal of portions of structures (e.g., walls, ceiling, large surface replastering, major re-plumbing); and window replacement.

Licensed lead safe renovation (LSR) contractors must have a trained and certified LSR supervisor on their staff. An LSR supervisor is a person who is duly certified under 454 CMR 22.06 to carry out supervisory functions on renovation projects, and with the additional training specified by 454 CMR 22.08(4)(e), to carry out supervisory functions and/or performs the work, in accordance with 454 CMR 22.12(2), on moderate risk deleading projects. An LSR supervisor is always required to be on site while renovation work is in progress. Entities that perform renovation work (as defined in 454 CMR 22.02) must be licensed as a LSR contractor, deleading contractor, or have a contractor licensing waiver.

In addition, in relation to All Work which may disturb paint or coating, or which may disturb lead in paint or lead in coating, PEER recommends that the policies, rules, and regulations from OSHA (and specifically, OSHA 29 CFR 1926.62 Subpart D, Lead) be reviewed and followed by the Contractor or Contractors performing the Work, for applicability to the Work at the Site on the Property.

6. Standard of Care / Limitations / Reliance / General Comments

As detailed in the above paragraphs, this limited hazardous building materials inspection report (this "Report") was conducted utilizing limited, non-destructive sampling techniques. Therefore, efforts were made to determine if multiple layers of building materials may be present although limited to the extent of allowable access points with hand tools without affecting historical integrity, structural integrity, the impact to the health and safety of those occupants or workers present, or anticipated to be present, security, fire and life safety, slips, trips and/or fall hazards, and including unacceptable aesthetic or functional damage to building surfaces and materials, as per the judgment of the inspector at the time of the Inspection.

Please note that additional suspect hazardous building materials may be present associated with the Building such as those in concealed spaces, cavities, plenums, behind walls, above ceilings, beneath floors, beneath roofs or roof decks, beneath slabs or underground, in crawl spaces, in confined spaces, behind or associated with any electrical, heating, ventilation, air conditioning, or mechanical system, and in any other area, including non-accessible or unsafe areas (as determined by PEER) associated with the proposed Work for the Building or a future proposed Work for the Building.

This limited hazardous building materials inspection was performed in accordance with generally accepted Practices of this profession, undertaken in similar studies at the same time and in the same geographical area, and in a manner consistent with the level of care and skill ordinarily exercised by members of the profession currently practicing.

We have endeavored to meet this standard of care, but may be limited by conditions encountered during its performance, a client-driven scope of work, the inability to review information not received by the report date, and/or any other condition as determined by PEER.

The limited hazardous building materials inspection, such as the one performed at the Building on the Property, is of limited scope, is noninvasive, and cannot eliminate the potential for hazardous building materials to occur elsewhere at the Building on the Property beyond what has been identified through the limited scope of services included in PEER's proposal as part of this limited hazardous building materials inspection.

In conducting the limited scope of services described herein, certain sources of information and other public records were not reviewed. The limitations herein must be considered when Arrowstreet and the Town of Southborough formulates opinions as to risks associated with the Building on the Property or otherwise uses this Report for any other purpose. These risks may be further evaluated – but not eliminated – through additional research and/or assessment. We will, upon your written request, advise you of additional research or assessment options that may be available and associated costs.

We have no obligation to provide information obtained or discovered by us after the issuance date of this Report, or to perform any additional scope of services, regardless of whether the information would affect any findings, and/or opinions, and/or conclusions, and/or recommendations in this Report. This disclaimer specifically applies to any information that has not been provided by the Client, and/or by the Facility Owner/Operator, and/or by any other person or entity, as of the date of this Report.

Findings, opinions, and conclusions in this Report are based upon the current use of the Building on the Property, and information visually and/or physically observed during our limited, non-destructive

assessment of the specific building materials sampled (identified earlier in this report from the most recent site visit on April 17, 2024).

Therefore, such information, including findings, opinions, and conclusions are subject to change. Certain indicators of the presence of hazardous building materials may have been latent, inaccessible, not observable, or not present during the most recent site visit and may have subsequently become observable (such as after property renovations, building repairs, building demolition, new development on the property, and/or redevelopment on the Property). Further, our scope of services are not to be construed as legal interpretation or legal advice.

This Report has been prepared for the exclusive use and reliance of Arrowstreet and the Town of Southborough (the "Authorized Parties"). Use or reliance by any other party is prohibited without the written authorization of Arrowstreet, the Town of Southborough, and PEER Consultants, P.C.

Reliance on this Report by the Authorized Parties will be subject to the terms, conditions and limitations stated in the PEER proposal (or proposals), stated in this Report, and/or stated in PEER's Agreement for Services with the Client. The limitation of liability (i.e., the total cost defined in the PEER's June 30, 2023 proposal to the Client and/or PEER's Agreement for Services) is the aggregate limit of PEER's liability to the Client, and all relying parties.

The information contained in this Report (dated April 26, 2024) is relevant to the date on which the most recent inspection was performed (April 17, 2024) and should not be relied upon to represent building conditions at a later date. This Report represents our scope of services to Arrowstreet and the Town of Southborough as of this Report date and constitutes our Final document; its text may not be altered after issuance.

This Report is not a stand-alone bidding document and **MUST NOT** be used by itself for bidding purposes. Contractors or consultants or any other party reviewing this Report must draw their own conclusions regarding further investigation, further assessment, further sampling, and/or remediation/abatement deemed necessary. PEER does not warrant the work of regulatory agencies, laboratories, and any or all other third parties supplying information which may have been used in the preparation of this Report. No warranties, express or implied, are intended or made.

Appendix A

Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using PLM

Sample Log and Analytical Data

OrderID: 132402216

EMSL ANALYTICAL, INC.
LABORATORY • PRODUCTS • TRAINING

Asbestos Bulk Building Materials - Chain of Custody

EMSL Analytical, Inc.
5 Constitution Way, Unit A
Woburn, MA 01801
PHONE: (781) 933-8411
EMAIL: bostonlab@emsl.com

EMSL Order Number / Lab Use Only

132402216

Customer Information		Billing Information	
Customer ID:	PEER42	Billing ID:	PEER42
Company Name:	PEER Consultants	Company Name:	PEER Consultants
Contact Name:	Dave Gorden	Billing Contact:	Dave Gorden
Street Address:	10 Mall Road, Suite 301	Street Address:	10 Mall Road, Suite 301
City, State, Zip:	Burlington MA 01803	City, State, Zip:	Burlington MA
Country:	US	Country:	US
Phone:	781-238-8880	Phone:	781-238-8880
Email(s) for Report:	gordend@peercpc.com	Email(s) for Invoice:	gordend@peercpc.com

Project Information

Project Name/No:	Margaret A. Neary School / 8404	Purchase Order:	8404
EMSL LIMS Project ID: (If applicable, EMSL will provide)		US State where samples collected:	MA
State of Connecticut (CT) must select project location:	☐ Commercial (Taxable) ☐ Residential (Non-Taxable)		
Sampled By Name:	Dave Gorden (PEER)	Sampled By Signature:	
Date Sampled:	4/17/24	No. of Samples in Shipment	90

Turn-Around-Time (TAT)

☐ 3 Hour ☐ 6 Hour ☐ 24 Hour ☐ 32 Hour ☑ 48 Hour ☐ 72 Hour ☐ 96 Hour ☐ 1 Week ☐ 2 Week

Please call ahead for large projects and/or turnaround times 6 Hours or Less. *32 Hour TAT available for select tests only; samples must be submitted by 11:30am.

Test Selection

PLM - Bulk (reporting limit)

- ☑ PLM EPA 600/R-93/116 (<1%)
- ☐ PLM EPA NOB (<1%)
- ☐ POINT COUNT
  - ☐ 400 (<0.25%) ☐ 1,000 (<0.1%)
- ☐ POINT COUNT w/ GRAVIMETRIC
  - ☐ 400 (<0.25%) ☐ 1,000 (<0.1%)
- ☐ NIOSH 9002 (<1%)
- ☐ NYS 198.1 (Friable - NY)
- ☐ NYS 198.6 NOB (Non-Friable - NY)
- ☐ NYS 198.8 (Vermiculite SM-V)

TEM - Bulk

- ☐ TEM EPA NOB
- ☐ NYS NOB 198.4 (Non-Friable - NY)
- ☐ TEM EPA 600/R-93/116 w Milling Prep (0.1%)

Other Tests (please specify)

☐ Positive Stop - Clearly Identified Homogeneous Areas (HA)

Sample Number	HA Number	Sample Location	Material Description

Special Instructions and/or Regulatory Requirements (Sample Specifications, Processing Methods, Limits of Detection, etc.)

A1 to A63

Method of Shipment:	Delivery	Sample Condition Upon Receipt:	SM 935
Relinquished by:	Dave Gorden (PEER)	Date/Time: 4/19/24 0932	Received by: REC'D EMSL-BOSTON APR 19 2024 walk in
Relinquished by:		Date/Time:	Received by:

Controlled Document - Asbestos Bulk R7 9/14/2021

☑ AGREE TO ELECTRONIC SIGNATURE (By checking, I consent to signing this Chain of Custody document by electronic signature.)

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ENGINEERS • SCIENTISTS • PLANNERS

10 Mall Road, Suite 301 • Burlington, MA 01803 • (781) 238-8880 • Fax (781) 238-8884

CLIENT: Arrowstreet
PROJECT NAME: Margaret A. Neary School
PROJECT #: 8404

Hazardous Building Material Inspection Sample Log / Chain of Custody

BUILDING NAME: MANS, 53 Parkerville Rd., Southborough, MA
YEAR: 2024 ▲ SAMPLING DATE: April 17

ASBESTOS INSPECTOR: D. Gorden (PEER); MA: AI-900459

Homogenous Group Sample No.		Location (Level / Room)	Building Material / Type (S, TSI, M)	Physical Assessment Category, and Damage Type or Disturbance Potential	Detailed Description of Sampled Material	Quantity / Other
A-1	1	Room 22	G. putty	M	yellow-white glazing putty for MR glass @ wood CR door	9x43" H/B
A-2	2		coating		gray coating on base/bottom of 19x22" metal sink.	
A-3	3		AWT		white coated gray back 1x1' AWT w/ pinpricks + valleys on wall	
A-4A	4		RFT		Brown-light brown-black-pink speckled/mosaic 12x12" RFT	
A-4B	4		mastic		Black mastic on back of RFT and on concrete floor	
A-5A	5		cement board		Black 6x60" cement board window sill w/ white fibers	
A-5B	5		mortar		light gray mortar beneath sill at vertical wall surface	
A-5C	5		CM		light gray-gray cementitious material as filler for sill at edge of cmu wall	
A-6	6		G putty		light gray brittle glazing putty for operable exterior window	15x56"
A-7	7		G. putty		light gray brittle glazing putty for non-op. window glass pane	56x63"
A-8A	8		F. caulk		Brown firm interior frame caulk for exterior window system	
A-8B	8		F. caulk		white brittle frame caulk / textured cmu coating as contaminant	
A-9A	9		coating		white painted white coating on surface of cmu	
A-9B	9		cmu		gray cmu wall block w/ black grains	16x7.5x 5.5"
A-9C	9		mortar		light gray mortar for gray cmu at cmu to cmu connections	
A-10	10		O. caulk		white painted white firm other caulk at cmu/cmu corner connect	
A-11	11		G putty		gray glazing putty for MR. glass @ wood for CR door exit D3	9x43" H/B
A-12	12		F. caulk		yellow stained light gray-white frame caulk solid wood DF at closet	

Physical Assessment: (1) Damaged "D" or significantly damaged "SD" TSI ACBM, (2) D friable surfacing ACBM, (3) SD friable surfacing ACBM, (4) D or SD friable miscellaneous ACBM, (5) ACBM with potential for D, (6) ACBM with potential for SD, (7) Any remaining friable ACBM or friable suspected ACBM.

Damage Type: Contact, Water, Age, Vibration, Air Erosion

Disturbance Potential: Low, Moderate, High

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10 Mall Road, Suite 301 • Burlington, MA 01803 • (781) 238-8880 • Fax (781) 238-8884

CLIENT: Arrowstreet
PROJECT NAME: Margaret A. Neary School
PROJECT #: 8404

Hazardous Building Material Inspection Sample Log / Chain of Custody

BUILDING NAME: MANS, 53 Parkerville Rd., Southborough, MA
YEAR: 2024 ▲ SAMPLING DATE: April 17

ASBESTOS INSPECTOR: D. Gorden (PEER); MA: AI-900459
PAGE 3 OF 6

Homogenous Group Sample No.		Location (Level / Room)	Building Material / Type (S, TSI, M)		Physical Assessment Category, and Damage Type or Disturbance Potential — Detailed Description of Sampled Material	Quantity / Other
A-13A	13	Room 22	CB	M	Black hard 3.5" wide cove base at base of fixed cabinetry.	
A-13B	13	↓	mastic	↓	yellow-brown mastic on ~~3~~ 4.25" CB and on wood cabinetry base	
A-14A	14		CB		Black hard 4.25" cwide cove base at base of cmu wall / fixed closet	
A-14B	14		mastic		Brown mastic on 4.25" wide cove base + on cmu / wood	
A-15	15		ACT		white coated 2x2' ACT w/ surface s-m dots and long valleys (w/ Hi brown interior)	TYPE A
A-16	16	↓	cement. mud		white cementitious mud wrapped on elbow fittings in plenum	
A-17	17	Hallway at Room 22	ACT		white textured/coated 2x2' ACT w/ lt gray interior (071300-LM-01-34)	TYPE B
A-18A	18	↓	GWB		Brown paper coated light gray gwb above hall corridor door / in plenum	
A-18B	18		JC		white joint compound / joint tape on light gray gwb - hall corridor door	
A-19	19		SEALANT		Red sealant at through wall pipe run in plenum above corridor door	firm
A-20	20		F. Caulk		white hard frame caulk for hallway corridor door at cmu	
A-21	21	↓	G. putty		Light gray brittle glazing putty for 7.5' x 8' corridor door system	MR glass
A-22A	22	Room 22	CANVAS		light blue painted 1/4" thick canvas tack board wall of CR	mastic wall?
A-22B	22	↓	MASTIC		Brown mastic on back of canvas + on wood backing board wall CR	
A-23	1	Room 6	G. putty		See A1	which ones fire door
A-24	23	↓	coating		Black coating on base / bottom of 19 x 25" metal sink.	
A-25	3	↓	AWT		See A3	
A-26A	4	↓	RFT	↓	See A4A	

Physical Assessment: (1) Damaged "D" or significantly damaged "SD" TSI ACBM, (2) D friable surfacing ACBM, (3) SD friable surfacing ACBM, (4) D or SD friable miscellaneous ACBM, (5) ACBM with potential for D, (6) ACBM with potential for SD, (7) Any remaining friable ACBM or friable suspected ACBM.

Damage Type: Contact, Water, Age, Vibration, Air Erosion

Disturbance Potential: Low, Moderate, High

REC'D EMSL-BOSTON APR 19 2024

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CLIENT: Arrowstreet
PROJECT NAME: Margaret A. Neary School
PROJECT #: 8404

Hazardous Building Material Inspection Sample Log / Chain of Custody

BUILDING NAME: MANS, 53 Parkerville Rd., Southborough, MA
YEAR: 2024 ▲ SAMPLING DATE: April 17

ASBESTOS INSPECTOR: D. Gorden (PEER); MA: AI-900459
PAGE 4 OF 6

Homogenous Group / Sample No.		Location (Level / Room)	Building Material / Type (S, TSI, M)		Physical Assessment Category, and Damage Type or Disturbance Potential / Detailed Description of Sampled Material	Quantity / Other
A-26B	4	Room 6	mastic	M	see A4B	
A-27A	5		cement board		see A5A	
A-27B	5		mortar		see A5B	
A-27C	5		CM		see A5C	
A-28	24		G, putty		Black sticky glazing putty for operable exterior window	15×57" some rubber
A-29	7		G, putty		see A7	42×57" +3rd pane
A-30A	8		G, F, caulk		see A8A	
A-30B	8		F, caulk		see A8B	
A-31A	9		coating		see A9A	
A-31B	9		cmu		see A9B	
A-31C	9		mortar		see A9C	
A-32	10		O, caulk		see A10	
A-33	12		F, caulk		see A12 (entry door)	
A-34A	13		CB		see A13A	
A-34B	13		mastic		see A13B	
A-35A	14		CB		see A14A	
A-35B	14		mastic		see A14B	
A-36	15		ACT		see A15	TYPE A

Physical Assessment: (1) Damaged "D" or significantly damaged "SD" TSI ACBM, (2) D friable surfacing ACBM, (3) SD friable surfacing ACBM, (4) D or SD friable miscellaneous ACBM, (5) ACBM with potential for D, (6) ACBM with potential for SD, (7) Any remaining friable ACBM or friable suspected ACBM.

Damage Type: Contact, Water, Age, Vibration, Air Erosion

Disturbance Potential: Low, Moderate, High

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Hazardous Building Material Inspection Sample Log / Chain of Custody

BUILDING NAME: MANS, 53 Parkerville Rd., Southborough, MA
YEAR: 2024 ▲ SAMPLING DATE: April 17

ASBESTOS INSPECTOR: D. Gorden (PEER); MA: AI-900459

Homogenous Group / Sample No.		Location (Level / Room)	Building Material / Type (S, TSI, M)		Physical Assessment Category, and Damage Type or Disturbance Potential / Detailed Description of Sampled Material	Quantity / Other
A-37	16	Room 6	cement. mud	M	see A16	
A-38	17	↓	ACT		white textured/coated 2x2' ACT w/ lt gray interior (071200LM2243)	Relates TYPEC
A-39A	18	Hallway at Room 6	GWB		see A18A	
A-39B	18	↓	JC		see A18B	
A-40	20	↓	F. caulk		see A20	
A-41	21	↓	G. putty		light gray brittle glazing putty for 10' x 8.6' high 5 pane MR glass DS	
A-42A	22	Room 6	CANVAS		see A22A (blue paint)	
A-42B	22	↓	mastic		see A22B	
A-43A	25	Hallway at Room 15	RFT		gray 12x12" speckled RFT w/ lt gray/dark gray specks	
A-43B	25	↓	mastic.		Black mastic under RFT and on concrete slab (check for yellow mastic)	
A-44A	25	Hallway at Gym	RFT		see A 43A	
A-44B	25	↓	mastic		Black mastic under yellow mastic and on concrete slab	
A-44C	25	↓	mastic		yellow mastic on surface of black mastic and on RFT	
A-45	26	Courtyard at Entry A1	F. caulk		light red firm frame caulk for double glass doors w/ transom into CY	metal at brick
A-46	27	↓	F. caulk		gray firm frame caulk for 2 door system into CY - on metal	
A-47	28	↓	O caulk		white hard remnant frame caulk for suspect former boarded area. HW W	3 glass
A-48A	29	↓	g putty		black to dark gray exterior glazing putty on surface of CY HW windows	
A-48B	29	↓	↓	↓	light brown glazing putty on exterior windows for CY at HW	

Physical Assessment: (1) Damaged "D" or significantly damaged "SD" TSI ACBM, (2) D friable surfacing ACBM, (3) SD friable surfacing ACBM, (4) D or SD friable miscellaneous ACBM, (5) ACBM with potential for D, (6) ACBM with potential for SD, (7) Any remaining friable ACBM or friable suspected ACBM.

Damage Type: Contact, Water, Age, Vibration, Air Erosion

Disturbance Potential: Low, Moderate, High

OrderID: 132402216

132402216

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CLIENT: Arrowstreet
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PROJECT #: 8404

Hazardous Building Material Inspection Sample Log / Chain of Custody

BUILDING NAME: MANS, 53 Parkerville Rd., Southborough, MA
YEAR: 2024 ▲ SAMPLING DATE: April 17

ASBESTOS INSPECTOR: D. Gorden (PEER); MA: AI-900459
PAGE 6 OF 6

Homogenous Group Sample No.		Location (Level / Room)	Building Material / Type (S, TSI, M)		Physical Assessment Category, and Damage Type or Disturbance Potential — Detailed Description of Sampled Material	Quantity / Other
A-49	30	Courtyard at entry A1	O caulk	M	white-light brown firm, hard other caulk cement. forms at red brick	
A-50	31	↓	O. caulk	↓	white-light brown firm, hard other caulk cement forms @ gravel panel	
A-51A	29	↓	G. putty		see A48A	
A-51B	29	↓	↓		see A48B	
A-52	32		O caulk		white firm other caulk coating mortar in b/w cm panels at roof elev	
A-53	33		cement. mat.		yellowish-white preformed vertical cement panels (finegrained) at Roof elev	
A-54	34		O caulk		white firm, hard other caulk as horiz. bead preformed panels at brick	
A-55	35		cement. mat.		white fine grained cm frame for gravel panel (w/white suspect quartz)	3'x5' Relates
A-56	36		↓		white fine grained cm beams for ext. edge of window system (w/ white suspect quartz)	6"x10' Relates
A-57A	37		brick		Red to red brown brick for ext envelope of building	8x2 1/4 x3.5"D
A-57B	37	↓	mortar		white mortar in b/w red to red brown brick for ext of build	
A-58	38	Exterior Door A2	F. caulk		red painted light gray frame caulk - metal at brick - door A2	
A-59	39	Exterior	F. caulk		Black Flexible frame caulk for new window penetration "lemieux" offs	36.5x 66.5"
A-60A	37	Exterior @ B1 door	brick		see A57A	
A-60B	37	↓	mortar		see A57B	
A-61	40	↓	concrete		gray f-m grained - few coarse graine concrete as foundation	
A-62	41	Exterior @ B1 door	F. caulk		red painted pink firm frame caulk metal door at brick.	
A-63		↓	g. putty	↓	white brittle glazing putty for side glass transom panel in door syst	5 GL Transoms 1 door.

Physical Assessment: (1) Damaged "D" or significantly damaged "SD" TSI ACBM, (2) D friable surfacing ACBM, (3) SD friable surfacing ACBM, (4) D or SD friable miscellaneous ACBM, (5) ACBM with potential for D, (6) ACBM with potential for SD, (7) Any remaining friable ACBM or friable suspected ACBM.

Damage Type: Contact, Water, Age, Vibration, Air Erosion

Disturbance Potential: Low, Moderate, High

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EMSL Order:	132402216
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Project ID:	

Attention:	Dave Gorden PEER Consultants 10 Mall Road, Suite 301 Burlington, MA 01803	**Phone:**	(781) 238-8880
		Fax:	(781) 238-8884
		Received Date:	04/19/2024 9:35 AM
		Analysis Date:	04/22/2024 - 04/23/2024
		Collected Date:	04/17/2024
Project:	8404 / Margaret A. Neary School		

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

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-1 *132402216-0001*	Room 22 - Yellow-White Glazing Putty for MR Glass at Wood CR Door	Tan Non-Fibrous Homogeneous	HA: 1	98% Non-fibrous (Other)	2% Chrysotile
A-2 *132402216-0002*	Room 22 - Gray Coating on Base/Bottom of 19x22" Metal Sink	Gray Fibrous Homogeneous	HA: 2	90% Non-fibrous (Other)	10% Chrysotile
A-3 *132402216-0003*	Room 22 - White Coated Gray Back 1x1' AWT w. Pinpricks & Valleys on Wall	Gray/White Fibrous Homogeneous	40% Cellulose 30% Min. Wool HA: 3	30% Non-fibrous (Other)	None Detected
A-4A *132402216-0004*	Room 22 - Brown-Light Brown-Black-Pink Speckled/Mosaic 12x12" RFT	Brown/Gray Fibrous Homogeneous	HA: 4	96% Non-fibrous (Other)	4% Chrysotile
A-4B *132402216-0005*	Room 22 - Black Mastic on Back of RFT & on Concrete Floor	Black Fibrous Homogeneous	HA: 4	90% Non-fibrous (Other)	10% Chrysotile
A-5A *132402216-0006*	Room 22 - Black 6x60" Cement Board Window Sill w. White Fibers	Black Fibrous Homogeneous	HA: 5	85% Non-fibrous (Other)	15% Chrysotile
A-5B *132402216-0007*	Room 22 - Light Gray Mortar beneath Sill at Vertical Wall Surface	Gray Non-Fibrous Homogeneous	HA: 5	100% Non-fibrous (Other)	None Detected
A-5C *132402216-0008*	Room 22 - Light Gray-Gray Cementitious Material as Filler for Sill at Edge of CMU Wall	Gray Non-Fibrous Homogeneous	HA: 5	100% Non-fibrous (Other)	None Detected
A-6 *132402216-0009*	Room 22 - Light Gray Brittle Glazing Putty for Operable Exterior Window	Tan Non-Fibrous Homogeneous	HA: 6	97% Non-fibrous (Other)	3% Chrysotile
A-7 *132402216-0010*	Room 22 - Light Gray Brittle Glazing Putty for Non-Op Window Glass Pane	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile

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Sample	Description	Appearance	Non-Asbestos % Fibrous	Non-Asbestos % Non-Fibrous	Asbestos % Type
			HA: 7		
A-8A *132402216-0011*	Room 22 - Brown Firm Interior Frame Caulk for Exterior Window System	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 8		
A-8B *132402216-0012*	Room 22 - White Brittle Frame Caulk/Textured CMU Coating as Contaminant	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 8		
A-9A *132402216-0013*	Room 22 - White Painted White Coating on Surface of CMU	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 9		
A-9B *132402216-0014*	Room 22 - Gray CMU Wall Block w. Black Grains	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 9		
A-9C *132402216-0015*	Room 22 - Light Gray Mortar for Gray CMU at CMU to CMU Connections	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 9		
A-10 *132402216-0016*	Room 22 - White Painted White Firm Other Caulk at CMU/CMU Corner Connect	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 10		
A-11 *132402216-0017*	Room 22 - Gray Glazing Putty for MR Glass at Wood for CR Door Exit D3	Gray Non-Fibrous Homogeneous	2% Glass	98% Non-fibrous (Other)	None Detected
			HA: 11		
A-12 *132402216-0018*	Room 22 - Yellow Stained Light Gray-White Frame Caulk Solid Wood DF at Closet	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 12		
A-13A *132402216-0019*	Room 22 - Black Hard 3.5" Wide Cove Base at Base of Fixed Cabinetry	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 13		
A-13B *132402216-0020*	Room 22 - Yellow-Brown Mastic on 4.25" CB & on Wood Cabinetry Base	Brown Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
			HA: 13		
A-14A *132402216-0021*	Room 22 - Black Hard 4.25" Wide Cove Base at Base of CMU Wall/Fixed Closet	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
			HA: 14		

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-14B *132402216-0022*	Room 22 - Brown Mastic on 4.25" Wide Cove Base & on CMU/Wood	Brown Non-Fibrous Homogeneous	HA: 14	98% Non-fibrous (Other)	2% Chrysotile
A-15 *132402216-0023*	Room 22 - White Coated 2x2' ACT w. Surface S-M Dots & Long Valleys (w. Light Brown Interior)	Gray/White Fibrous Homogeneous	65% Min. Wool HA: 15	35% Non-fibrous (Other)	None Detected
A-16 *132402216-0024*	Room 22 - White Cementitious Mud Wrapped on Elbow Fittings in Plenum	Gray Fibrous Homogeneous	10% Min. Wool HA: 16	85% Non-fibrous (Other)	5% Chrysotile
A-17 *132402216-0025*	Hallway at Room 22 - White Textured/Coated 2x2' ACT w. Light Gray Interior (071300-LM-01-34)	Gray/White Fibrous Homogeneous	40% Cellulose 30% Min. Wool HA: 17	30% Non-fibrous (Other)	None Detected
A-18A *132402216-0026*	Hallway at Room 22 - Brown Paper Coated Light Gray GWB above Hall Corridor Door/in Plenum	Gray/Tan Fibrous Homogeneous	10% Cellulose 2% Glass HA: 18	88% Non-fibrous (Other)	None Detected
A-18B *132402216-0027*	Hallway at Room 22 - White Joint Compound/Joint Tape on Light Gray GWB - Hall Corridor Door	Tan Non-Fibrous Homogeneous	HA: 18	98% Non-fibrous (Other)	2% Chrysotile
A-19 *132402216-0028*	Hallway at Room 22 - Red Sealant at Through Wall Pipe Run in Plenum above Corridor Door	Red Fibrous Homogeneous	3% Glass HA: 19	97% Non-fibrous (Other)	None Detected
A-20 *132402216-0029*	Hallway at Room 22 - White Hard Frame Caulk for Hallway Corridor Door at CMU	White Non-Fibrous Homogeneous	HA: 20	100% Non-fibrous (Other)	None Detected
A-21 *132402216-0030*	Hallway at Room 22 - Light Gray Brittle Glazing Putty for 7.5x8' Corridor Door System	Tan Non-Fibrous Homogeneous	2% Glass HA: 21	98% Non-fibrous (Other)	None Detected
A-22A *132402216-0031*	Room 22 - Light Blue Painted 1/4" Thick Canvas Tack Board Wall of CR	Brown/Blue Fibrous Homogeneous	25% Cellulose HA: 22	75% Non-fibrous (Other)	None Detected

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-22B *132402216-0032*	Room 22 - Brown Mastic on Back of Canvas & on Wood Backing Board Wall CR	Brown Non-Fibrous Homogeneous	HA: 22	100% Non-fibrous (Other)	None Detected
A-23 *132402216-0033*	Room 6 - Yellow-White Glazing Putty for MR Glass at Wood CR Door	Tan Non-Fibrous Homogeneous	HA: 1	98% Non-fibrous (Other)	2% Chrysotile
A-24 *132402216-0034*	Room 6 - Black Coating on Base/Bottom of 19x25" Metal Sink	Black Fibrous Homogeneous	HA: 23	97% Non-fibrous (Other)	3% Chrysotile
A-25 *132402216-0035*	Room 6 - White Coated Gray Back 1x1' AWT w. Pinpricks & Valleys on Wall	Gray/White Fibrous Homogeneous	45% Cellulose 20% Min. Wool HA: 3	35% Non-fibrous (Other)	None Detected
A-26A *132402216-0036*	Room 6 - Brown-Light Brown-Black-Pink Speckled/Mosaic 12x12" RFT	Gray Fibrous Homogeneous	HA: 4	97% Non-fibrous (Other)	3% Chrysotile
A-26B *132402216-0037*	Room 6 - Black Mastic on Back of RFT & on Concrete Floor	Black Fibrous Homogeneous	HA: 4	90% Non-fibrous (Other)	10% Chrysotile
A-27A *132402216-0038*	Room 6 - Black 6x60" Cement Board Window Sill w. White Fibers	Black Non-Fibrous Homogeneous	HA: 5	85% Non-fibrous (Other)	15% Chrysotile
A-27B *132402216-0039*	Room 6 - Light Gray Mortar beneath Sill at Vertical Wall Surface	Gray Non-Fibrous Homogeneous	HA: 5	100% Non-fibrous (Other)	None Detected
A-27C *132402216-0040*	Room 6 - Light Gray-Gray Cementitious Material as Filler for Sill at Edge of CMU Wall	Gray Non-Fibrous Homogeneous	HA: 5	100% Non-fibrous (Other)	None Detected
A-28 *132402216-0041*	Room 6 - Black Sticky Glazing Putty for Operable Exterior Window	Black Non-Fibrous Homogeneous	HA: 24	100% Non-fibrous (Other)	None Detected
A-29 *132402216-0042*	Room 6 - Light Gray Brittle Glazing Putty for Non-Op Window Glass Pane	Gray Non-Fibrous Homogeneous	HA: 7	98% Non-fibrous (Other)	2% Chrysotile

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-30A *132402216-0043*	Room 6 - Brown Firm Interior Frame Caulk for Exterior Window System	Gray Non-Fibrous Homogeneous	HA: 8	100% Non-fibrous (Other)	None Detected
A-30B *132402216-0044*	Room 6 - White Brittle Frame Caulk/Textured CMU Coating as Contaminant	White Non-Fibrous Homogeneous	HA: 8	100% Non-fibrous (Other)	None Detected
A-31A *132402216-0045*	Room 6 - White Painted White Coating on Surface of CMU	White Non-Fibrous Homogeneous	HA: 9	100% Non-fibrous (Other)	None Detected
A-31B *132402216-0046*	Room 6 - Gray CMU Wall Block w. Black Grains	Gray Non-Fibrous Homogeneous	HA: 9	100% Non-fibrous (Other)	None Detected
A-31C *132402216-0047*	Room 6 - Light Gray Mortar for Gray CMU at CMU to CMU Connections	Gray Non-Fibrous Homogeneous	HA: 9	100% Non-fibrous (Other)	None Detected
A-32 *132402216-0048*	Room 6 - White Painted White Firm Other Caulk at CMU/CMU Corner Connect	White/Beige Non-Fibrous Homogeneous	1% Glass HA: 10	99% Non-fibrous (Other)	None Detected
A-33 *132402216-0049*	Room 6 - Yellow Stained Light Gray-White Frame Caulk Solid Wood DF at Closet	Tan/White Non-Fibrous Homogeneous	2% Fibrous (Other) HA: 12	98% Non-fibrous (Other)	None Detected
A-34A *132402216-0050*	Room 6 - Black Hard 3.5" Wide Cove Base at Base of Fixed Cabinetry	Black Non-Fibrous Homogeneous	HA: 13	100% Non-fibrous (Other)	None Detected
A-34B *132402216-0051*	Room 6 - Yellow-Brown Mastic on 4.25" CB & on Wood Cabinetry Base	Brown Non-Fibrous Homogeneous	HA: 13	98% Non-fibrous (Other)	2% Chrysotile
A-35A *132402216-0052*	Room 6 - Black Hard 4.25" Wide Cove Base at Base of CMU Wall/Fixed Closet	Black Non-Fibrous Homogeneous	HA: 14	100% Non-fibrous (Other)	None Detected
A-35B *132402216-0053*	Room 6 - Brown Mastic on 4.25" Wide Cove Base & on CMU/Wood	Brown Non-Fibrous Homogeneous	HA: 14	98% Non-fibrous (Other)	2% Chrysotile

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-36 *132402216-0054*	Room 6 - White Coated 2x2' ACT w. Surface S-M Dots & Long Valleys (w. Light Brown Interior)	Beige Fibrous Homogeneous	90% Min. Wool HA: 15	10% Non-fibrous (Other)	None Detected
A-37 *132402216-0055*	Room 6 - White Cementitious Mud Wrapped on Elbow Fittings in Plenum	Beige Non-Fibrous Homogeneous	60% Min. Wool HA: 16	20% Non-fibrous (Other)	20% Chrysotile
A-38 *132402216-0056*	Room 6 - White Textured/Coated 2x2' ACT w. Light Gray Interior (071200LM2243)	Gray/Tan/White Fibrous Homogeneous	50% Cellulose 30% Min. Wool HA: 17	20% Non-fibrous (Other)	None Detected
A-39A *132402216-0057*	Hallway at Room 6 - Brown Paper Coated Light Gray GWB above Hall Corridor Door/in Plenum	Brown/Gray Non-Fibrous Homogeneous	12% Cellulose 1% Glass HA: 18	87% Non-fibrous (Other)	None Detected
A-39B *132402216-0058*	Hallway at Room 6 - White Joint Compound/Joint Tape on Light Gray GWB - Hall Corridor Door	Tan/White Non-Fibrous Homogeneous	HA: 18	98% Non-fibrous (Other)	2% Chrysotile
A-40 *132402216-0059*	Hallway at Room 6 - White Hard Frame Caulk for Hallway Corridor Door at CMU	Gray/Tan/White Non-Fibrous Homogeneous	HA: 20	100% Non-fibrous (Other)	None Detected
A-41 *132402216-0060*	Hallway at Room 6 - Light Gray Brittle Glazing Putty for 10x8.6' High 5 Pane MR Glass DS	Gray/Tan/White Non-Fibrous Homogeneous	HA: 21	98% Non-fibrous (Other)	2% Chrysotile
A-42A *132402216-0061*	Room 6 - Light Blue Painted 1/4" Thick Canvas Tack Board Wall of CR (Blue Paint)	Brown/Tan Non-Fibrous Homogeneous	25% Cellulose HA: 22	75% Non-fibrous (Other)	None Detected
A-42B *132402216-0062*	Room 6 - Brown Mastic on Back of Canvas & on Wood Backing Board Wall CR	Brown Non-Fibrous Homogeneous	HA: 22	100% Non-fibrous (Other)	None Detected
A-43A *132402216-0063*	Hallway at Room 15 - Gray 12x12' Speckled RFT w. Light Gray/Dark Gray Specks	Gray Non-Fibrous Homogeneous	HA: 25	100% Non-fibrous (Other)	None Detected

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-43B *132402216-0064*	Hallway at Room 15 - Black Mastic under RFT & on Concrete Slab (Check for Yellow Mastic)	Brown/Black/Yellow Non-Fibrous Homogeneous	HA: 25	96% Non-fibrous (Other)	4% Chrysotile
A-44A *132402216-0065*	Hallway at Gym - Gray 12x12' Speckled RFT w. Light Gray/Dark Gray Specks	Gray Non-Fibrous Homogeneous	HA: 25	100% Non-fibrous (Other)	None Detected
A-44B *132402216-0066*	Hallway at Gym - Black Mastic under Yellow Mastic & on Concrete Slab	Brown/Black Non-Fibrous Homogeneous	HA: 25	95% Non-fibrous (Other)	5% Chrysotile
A-44C *132402216-0067*	Hallway at Gym - Yellow Mastic on Surface of Black Mastic & on RFT	Yellow Non-Fibrous Homogeneous	HA: 25	100% Non-fibrous (Other)	None Detected
A-45 *132402216-0068*	Courtyard at Entry A1 - Light Red Firm Frame Caulk for Double Glass Doors w. Transom into CY	Brown Non-Fibrous Homogeneous	HA: 26	100% Non-fibrous (Other)	None Detected
A-46 *132402216-0069*	Courtyard at Entry A1 - Gray Firm Frame Caulk for 2 Door System into CY - on Metal	Gray Non-Fibrous Homogeneous	HA: 27	100% Non-fibrous (Other)	None Detected
A-47 *132402216-0070*	Courtyard at Entry A1 - White Hard Remnant Frame Caulk for Suspect Former Boarded Area HWW	Brown/White/Black Non-Fibrous Homogeneous	2% Fibrous (Other) HA: 28	98% Non-fibrous (Other)	None Detected
A-48A *132402216-0071*	Courtyard at Entry A1 - Black to Dark Gray Exterior Glazing Putty on Surfaces of CY HW Windows	Gray/Black Non-Fibrous Homogeneous	HA: 29	100% Non-fibrous (Other)	None Detected
A-48B *132402216-0072*	Courtyard at Entry A1 - Light Brown Glazing Putty on Exterior Windows for CY at HW	Gray Non-Fibrous Homogeneous	HA: 29	98% Non-fibrous (Other)	2% Chrysotile
A-49 *132402216-0073*	Courtyard at Entry A1 - White-Light Brown Firm, Hard Other Caulk Cement. Forms at Red Brick		HA: 30		Not Submitted

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-50 *132402216-0074*	Courtyard at Entry A1 - White-Light Brown Firm, Hard Other Caulk Cement. Forms at Gravel Panel		HA: 31		Not Submitted
A-51A *132402216-0075*	Courtyard at Entry A1 - Black to Dark Gray Exterior Glazing Putty on Surfaces of CY HW Windows	Gray Non-Fibrous Homogeneous	HA: 29	92% Non-fibrous (Other)	8% Chrysotile
A-51B *132402216-0076*	Courtyard at Entry A1 - Light Brown Glazing Putty on Exterior Windows for CY at HW	Gray Non-Fibrous Homogeneous	HA: 29	98% Non-fibrous (Other)	2% Chrysotile
A-52 *132402216-0077*	Courtyard at Entry A1 - White Firm Other Caulk Coating Mortar in between CM Panels at Roof Elev	White Non-Fibrous Homogeneous	HA: 32	100% Non-fibrous (Other)	None Detected
A-53 *132402216-0078*	Courtyard at Entry A1 - Yellowish-White Preformed Vertical Cement. Panels (Fine Grained) at Roof Elev	Gray Non-Fibrous Homogeneous	HA: 33	100% Non-fibrous (Other)	None Detected
A-54 *132402216-0079*	Courtyard at Entry A1 - White Firm, Hard Other Caulk as Horiz. Bead Preformed Panels at Brick	White Non-Fibrous Homogeneous	HA: 34	100% Non-fibrous (Other)	None Detected
A-55 *132402216-0080*	Courtyard at Entry A1 - White Fine Grained CM Frame for Gravel Panel (w. White Suspect Quartz)	White Non-Fibrous Homogeneous	HA: 35	100% Non-fibrous (Other)	None Detected
A-56 *132402216-0081*	Courtyard at Entry A1 - White Fine Grained CM Beams for Ext. Edge of Window System (w. White Suspect Quartz)	White Non-Fibrous Homogeneous	HA: 36	100% Non-fibrous (Other)	None Detected
A-57A *132402216-0082*	Courtyard at Entry A1 - Red Toned Brown Brick for Ext. Envelope of Building	Red Non-Fibrous Homogeneous	HA: 37	100% Non-fibrous (Other)	None Detected
A-57B *132402216-0083*	Courtyard at Entry A1 - White Mortar in between Red to Red Brown Brick for Ext. of Build	Gray Non-Fibrous Homogeneous	HA: 37	100% Non-fibrous (Other)	None Detected

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-58 *132402216-0084*	Exterior Door A2 - Red Painted Light Gray Frame Caulk - Metal at Brick - Door A2	Brown Non-Fibrous Homogeneous	HA: 38	100% Non-fibrous (Other)	None Detected
A-59 *132402216-0085*	Exterior - Black Flexible Frame Caulk for New Window Penetration "Lemieur" Office	Brown Non-Fibrous Homogeneous	HA: 39	100% Non-fibrous (Other)	None Detected
A-60A *132402216-0086*	Exterior at B1 Door - Red Toned Brown Brick for Ext. Envelope of Building	Red Non-Fibrous Homogeneous	HA: 37	100% Non-fibrous (Other)	None Detected
A-60B *132402216-0087*	Exterior at B1 Door - White Mortar in between Red to Red Brown Brick for Ext. of Build	Gray Non-Fibrous Homogeneous	HA: 37	100% Non-fibrous (Other)	None Detected
A-61 *132402216-0088*	Exterior at B1 Door - Gray F-M Grained - Fair Coarse Grained Concrete as Foundation	Gray Non-Fibrous Homogeneous	HA: 40	100% Non-fibrous (Other)	None Detected
A-62 *132402216-0089*	Exterior at B1 Door - Red Painted Pink Firm Frame Caulk Metal Door at Brick	Brown Non-Fibrous Homogeneous	HA: 41	100% Non-fibrous (Other)	None Detected
A-63 *132402216-0090*	Exterior at B1 Door - White Brittle Glazing Putty for Side Glass Transom Panel in Door System	Gray Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile

Analyst(s)
Ava Kopellas (30)
John McCarthy (21)
Kevin McKenzie (37)

Steve Grise, Laboratory Manager
or Other Approved Signatory

Initial report from: 04/23/2024 12:52:27