efi global

BOSTON NORTH

March 13, 2024

Rick Underwood
Director of Operations & Maintenance
Lowell Public Schools
155 Merrimack Street, 4th Floor
Lowell, Massachusetts 01852

via email: runderwood@lowell.k12.ma.us

RE: AHERA 3-Year Reinspection
Cardinal O'Connell Early Learning Center
21 Carter Street
Lowell, Massachusetts
EFI Project No. 014.07795

Dear Mr. Underwood:

EFI Global Inc. (EFI) is pleased to present this AHERA 3-Year Reinspection Report prepared for the Cardinal O'Connell Early Learning Center located at 21 Carter Street, Lowell, Massachusetts (Site). The reinspection site visit was conducted on February 21, 2024, and the corresponding report was completed in accordance with the United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR 763) and Massachusetts Department of Labor Standards "Requirements for Schools Subject to AHERA" regulations (454 CMR 28.13).

EFI relied upon previous 3-Year Inspection and Management Plan Update report from 2014 prepared by Cardo ATC, and 2017 and 2020 reinspection's prepared by EFI Global Inc. The original AHERA Management Plan and other subsequent records were not made available at the school for review. EFI relied upon the 2020 table of identified ACM for this reinspection. The school's Management Plan and records should be located and kept on file at the school and the administrative offices.

EFI is pleased to provide environmental consulting services to Lowell Public Schools. This report should be kept on file with the school's AHERA records. If you have any questions regarding the contents of this report, or are in need of additional information, please contact either of the undersigned at (800) 659-1202. Thank you for the opportunity to serve your environmental needs.

Sincerely,
EFI Global, Inc.

Derrick Calvario
Project Manager
MA Asbestos Inspector # AI 900703

Michael McCarter
Senior Project Manager
MA Asbestos Management Planner #AP 035661

AHERA 3-YEAR REINSPECTION

FOR:

CARDINAL O'CONNELL EARLY LEARNING CENTER
21 CARTER STREET
LOWELL, MASSACHUSETTS

PREPARED BY:

efi global
BOSTON NORTH

155 WEST STREET, SUITE 6
WILMINGTON, MASSACHUSETTS 01887

EFI PROJECT NUMBER 014.07795

March 13, 2024

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INTRODUCTION

EFI Global, Inc. (EFI) was retained by Lowell Public Schools to perform a 3-Year AHERA Reinspection in accordance with United States Environmental Protection (USEPA) Asbestos Hazard Emergency Response Act (AHERA) asbestos regulations (40 CFR 763) and Massachusetts Department of Labor Standards "Requirements for Schools Subject to AHERA" regulations (454 CMR 28.13). These regulations, commonly known as the "Asbestos in Schools Rule," require under 40 CFR 763.80 and 454 CMR 28.13(2)(b)(1) that local education agencies (LEAs) must conduct a reinspection at least once every three years of all friable and nonfriable known or assumed asbestos-containing materials (ACMs). The reinspection includes all previously known and assumed ACMs, as well as any additional suspect ACM not previously included, as required by 40 CFR 763.80 and 454 CMR 28.13 in each school building leased, owned, or otherwise used as a school building. A school building is defined in 454 CMR 28.02 as including each of the following:

- Any structure suitable for use as a classroom, including a school facility such as a library, school eating facility, or facility used in the preparation of food
- Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education
- Any other facility used for the instruction or housing of students or for the administration of educational or research programs
- Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described as a school building above
- Any portico or covered exterior hallway or walkway
- Any exterior portion of a mechanical system used to condition interior space.

EFI conducted a 3-year AHERA re-inspection at the Cardinal O'Connell Early Learning Center, which involved determining the condition and hazard potential of previously known and assumed ACMs, and additional confirmed and assumed ACMs observed during the 2024 reinspection. The 3-year re-inspection was conducted on February 20, 2024, by Derrick Calvario and Emma Cypherd, both EPA accredited, and Massachusetts Department of Labor Standards (MADLS) licensed Asbestos Inspectors, (license number AI-900703) and (license number AI-901189) respectively. EFI relied upon the 2020 3-year reinspection table of identified and assumed ACMs for this reinspection. The original AHERA Management Plan and subsequent records were not made available at the school for review. The recommended response actions were prepared by MADLS-licensed Asbestos Management Planner Michael McCarter (AP-033118).

A summary of known and assumed ACM within the Cardinal O'Connell Early Learning Center is presented in the AHERA Summary Table in **Attachment A**. Site Plans showing buildings and locations referenced in this report are presented in **Attachment B.**

The Designated Person for the Lowell Public Schools is Rick Underwood. Rick's contact information is:

Rick Underwood
Director of Operations & Maintenance
Lowell Public Schools
155 Merrimack Street, 4th Floor
Lowell, Massachusetts 01852
978-674-4328
runderwood@lowell.k12.ma.us

AHERA 3-YEAR REINSPECTION

A. AHERA Records Review

As part of this 3-year reinspection, EFI reviewed available AHERA records for the school, in accordance with the AHERA regulation and 454 CMR 28.13(5)(f). A summary of records reviewed is provided in the table below.

Review of AHERA Documentation Cardinal O'Connell Early Learning Center 21 Carter Street, Lowell, Massachusetts		
Document/Record	**Present?**	**Comment**
Asbestos Management Plan (on hand at school and available for review)	No	No records available at the school for review. The Cardo ATC 2014 3-Year Reinspection and Updated Management Plan is posted on the school web site.
Designated Person Training Records (for Rick Underwood)	No	No records available at the school for review. Designated Person should receive formal designated person training or review the Designated Person Self Study Guide (available at https://www.epa.gov/sites/default/files/2015-01/documents/dp_study_guide_0.pdf).
Custodial Personnel 2-hour Awareness Training Records	No	No records available at the school for review.
Annual Parental Notification Records	No	No records available at the school for review. Annual notification letters should be sent and copies kept on file with the AHERA records.
Abatement/Response Action Records (includes abatement, special cleaning activities & small scale short duration (SSSD) activities and associated monitoring reports and work plans)	No	No records available at the school for review.
Designated Person True and Correct Statement	No	No records available at the school for review.
6-month Surveillance Inspection Records	No	No records available at the school for review.
Previous 3-Year Reinspection Records	No	No records available at the school for review.
Asbestos Labels present (required in routine maintenance areas)	No	No labeling observed. Labels should be placed immediately adjacent to ACM present in routine maintenance areas (i.e., boiler rooms, utility closets, etc.)

B. ACM Application Types

ACMs are divided into the following application types:

Thermal system insulation (TSI): Insulation applied to mechanical, heating, and cooling systems such as pipes, boilers, flue breechings, ducts, tanks and fittings.

Surfacing Materials: Material that is spray-applied or trowel-applied to walls, ceilings or structural components (i.e. plasters, acoustical finishes and fireproofing).

Miscellaneous Materials: All other asbestos materials, including but not limited to floor tiles and mastic, ceiling tiles, vinyl cove base and mastic, gypsum board and joint compound, and asbestos-cement board, etc.

C. ACM Assessment Criteria

The assessment is divided into two categories - the physical assessment and the hazard potential assessment.

Physical Assessment

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

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

Hazard Assessment

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

Hazard Rank #1 – Good condition/Low potential for disturbance
Hazard Rank #2 – Good condition/ Moderate potential for disturbance
Hazard Rank #3 – Good condition/ High potential for disturbance
Hazard Rank #4 – Damaged condition/Low potential for disturbance
Hazard Rank #5 – Damaged condition/Moderate potential for disturbance
Hazard Rank #6 – Damaged condition/High potential for disturbance
Hazard Rank #7 – Significantly damaged condition

The following is the Assessment Criteria used during the inspection:

1. Homogeneous Areas (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) were quantified by location and assessed by condition. Materials are listed as friable or non-friable. Note: friable materials are materials that can be crushed and pulverized to dust by hand pressure. A general condition description for suspect materials used in this inspection is as follows:

    a. Damaged Surfacing ACM: That material which has deterioration, delamination, water damage, lacks cohesion, is blistered, crumbling, gouged, marred heavily, abraded, or in any way has lost its structural integrity over more than 1% but less than 10 % of the total surface area if the damage is evenly distributed or less than 25%, if the damage is localized in one area of the homogeneous area.

    b. Significantly Damaged ACM: That material which has deterioration, delamination, water damage, lacks cohesion, is blistered, crumbling, gouged, marred heavily, abraded, or in any way has lost its structural integrity over at least 10% of the surface area if the damage is evenly distributed or at least 25% if the damaged is localized.

    c. Good Condition ACM: ACM with no visible damage or deterioration in less than one percent of the material and/or coverings.

    d. ACM with potential for damage: Pertains to circumstances in which:

        i. Friable ACM is in an area regularly used by building occupants, including maintenance workers, currently in intact (good) condition.

        ii. There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated or delaminated due to factors such as changes in building use, changes in O&M practices, changes in occupancy or recurrent damage.

Note: All ACM in good condition is still considered to have a potential for damage, and in certain instances, has the potential for significant damage.

    e. ACM with potential for significant damage: Pertains to circumstances in which:

        i. Friable ACM is in an area regularly used by building occupants, including maintenance personnel.

        ii. Indications show that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in O&M practices, changes in occupancy or re-occurring damage.

        iii. The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or under certain circumstances, vibration or air erosion.

D. Response Actions – General Recommendations

Specific response actions for each known and assumed ACM located at the Cardinal O'Connell Early Learning Center are located in **Attachment A**. The following are general recommendations for response actions associated with managing ACMs at the school.

1. Damaged materials in the school should be repaired, if feasible, or removed in order to maintain compliance with the AHERA regulations. Damaged ACMs of any quantity listed in the report should be repaired or removed by a Massachusetts licensed asbestos abatement contractor following all applicable regulations, in accordance with a work plan design, and final clearance air testing performed in accordance with the AHERA regulations. It is the policy of the Lowell Public Schools to use licensed asbestos contractors for all response action work.

2. The AHERA regulation states that the response actions chosen for other than small scale/short duration repairs (less than 3 square or linear feet), must be designed and conducted by persons accredited to design and conduct response actions. MADLS Regulation 454 CMR 28.00 requires the services of licensed Project Designers who meet the requirements set forth in 454 CMR 28.00, as well as Massachusetts licensed Asbestos Contractors.

3. Damaged ACMs that involve small scale/short duration repairs can only be conducted by 16-hour asbestos-trained personnel or by a licensed Asbestos Contractor. EFI understands that small scale/ short duration projects will not be performed by in house personnel, and that all work will be conducted by an outside licensed Asbestos Contractor.

4. Each known and assumed ACM should be monitored for any changes in condition during the six-month periodic surveillance, or more frequently.

5. If known or suspect ACMs are to be impacted by planned renovation or demolition activities, the ACM must be removed by a Massachusetts licensed Asbestos Contractor. Note that AHERA inspections do not meet the EPA NESHAP and Commonwealth of Massachusetts Department of Environmental Protection (MADEP) requirements for a comprehensive pre-renovation or demolition survey. Prior to any planned renovation or demolition project, all renovation/demolition areas must be thoroughly surveyed to meet the requirements of EPA NESHAP and MADEP 310 CMR 7.15(4) Survey Requirements. LEA Designated Persons should make sure that pre-renovation/demolition surveys are performed in each instance that ACM may be disturbed.

E. AHERA Licensing & Training Documentation

The AHERA 3-year Reinspection report for the Cardinal O'Connell Early Learning Center was performed by the following individuals who have received appropriate training and who are MADLS licensed personnel:

Derrick Calvario
Project Manager
MA Asbestos Inspector # AI 900703

Michael McCarter
Senior Project Manager
MA Asbestos Management Planner #AP 035661

F. Asbestos Bulk Sampling

Asbestos bulk sampling of suspect ACM was performed for various suspect ACMs not previously identified as ACM in portions of the building included in the AHERA program. The bulk sampling was performed by USEPA-accredited, and MADLS licensed Asbestos Inspector Derrick Calvario and Emma Cypherd. A total of 33 bulk samples of suspect ACMs were collected and transported under chain of custody protocol to EMSL Analytical, Inc., of Woburn, Massachusetts, a Massachusetts-licensed laboratory. EMSL is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos fiber analysis, which is administered by the National Institute of Standards and Testing (NIST).

Samples were analyzed with a standard 3-day turnaround time using polarized light microscopy (PLM) in accordance with United States Environmental Protection Agency (USEPA) Method 600/R-93/116. The PLM/DS analytical method is modeled after 40 CFR Part 763, Subpart F, Attachment A: "Interim Method for the Determination of Asbestos in Bulk Insulation Samples." MADEP asbestos regulations define an ACM as any material containing greater than or equal to one percent asbestos. The findings of this report are based upon observations of accessible materials and the analysis of representative bulk samples collected. **Attachment B** contains site plans indicating locations of samples collected and analyzed as part of this reinspection. A copy of the asbestos laboratory reports is presented in **Attachment C**.

Bulk samples representing individual homogenous areas of suspect ACM, (materials that are determined to be uniform in color and texture and installed in the same construction period) were collected in a randomly distributed manner, in accordance with the EPA sampling protocol outlined in 40 CFR 763.

The following suspect ACMs sampled by EFI during the 2024 reinspection were reported by EMSL as containing no detectable concentration of asbestos:

Summary of Non-ACMs per 2024 3-Year Reinspection

Material Description	Location(s) Sampled
1’ X 1’ White Floor Tile	Basement CFCE Area
Yellow Mastic Associated with 1’ X 1’ White Floor Tile	Basement CFCE Area
2’ X 4’ Pinhole Ceiling Tile	3rd/4th Floor Staircase, Basement Hallways
Yellow Carpet Mastic	Main Office 2nd Floor
Ceramic Tile Grout	2nd Floor Hallway
Gypsum Board*	Basement Hall, 3rd Floor Offices
Base Coat Plaster*	Basement Left Stair, Principals Office, 2nd Floor Main Hallway, 3rd Floor Stair Right, 3rd Floor Faculty Room, 3rf Floor Offices, 3rd Floor Stair Case Ceiling

* EFI recommends that the material be treated and disposed of as an ACM since the associated ACM cannot be easily separated (associated ACM is listed in the AHERA 3-year reinspection table contained in Attachment A).

G. ACM Hazard Assessment & Recommended Response Actions

Accessible locations were inspected and assessed to determine the presence and condition of ACM. A Summary Table of known and assumed ACMs present at the school, the physical and hazard assessments and the recommended response action for each ACM, is presented in **Attachment A.** It should be noted that EFI did not conduct destructive evaluations of the school building to identify suspect ACM. Per USEPA NESHAP and MADEP asbestos regulations, a thorough "path of construction" survey should be conducted prior to any renovation or repair activities that may impact suspect ACM, regardless of the date of installation.

H. Cost Estimate and Schedule for Recommended Response Actions

The confirmed and assumed ACMs outlined in the summary table in **Attachment A** that were in good condition at the time of the reinspection must be maintained in place in accordance with the Operations and Maintenance Plan. Estimated costs associated with managing known and assumed ACMs at the school are summarized below.

Cost Estimate of AHERA Considerations Cardinal O'Connell Early Learning Center 21 Carter Street, Lowell, Massachusetts	
Training Costs	
Item	**Approximate Cost**
2-hour asbestos awareness training (New Hires, within 60 days of hire)	$500/person
Designated Person Training	$250
Maintenance Costs	
Item	**Approximate Cost**
Asbestos labeling (Place/maintain labels adjacent to ACM in routine maintenance areas)	$500
6-month surveillance inspections (Per schedule below)	$500/event
3-year re-inspection (Per schedule below)	$2,000
Response Action Costs	
Item	**Approximate Cost**
Immediately and annually notify occupants regarding ACM materials noted in the Summary Table if Identified and Assumed ACMs.	$500
2' x 4' Large fissured ceiling tile – Perform initial cleaning as recommended in the Summary Table if Identified and Assumed ACMs.	$10.000

A proposed schedule of events between this 3-Year reinspection and the 2027 3-Year reinspection is provided for your use:

Schedule of AHERA-Related Actions Cardinal O'Connell Early Learning Center 21 Carter Street, Lowell, Massachusetts	
Event	**Completion Date**
Immediately and annually notify occupants regarding ACM ceiling tile, plaster skim coat, and joint compound as recommended in the Summary Table of Identified and Assumed ACMs.	By February 20th, 2024, and annually thereafter.
2' x 4' Large fissured ceiling tile – Perform initial cleaning as recommended in the Summary Table of Identified and Assumed ACMs.	By February 20th, 2024, and annually thereafter. Perform initial cleaning buy June 30th, 2024
6 Month Surveillance Inspection	August 20, 2024
Annual Parental Notification Letter	September 1, 2024
6 Month Surveillance Inspection	February 20, 2025
6 Month Surveillance Inspection	August, 2025
Annual Parental Notification Letter	September 1, 2025
6 Month Surveillance Inspection	February 20, 2026
6 Month Surveillance Inspection	August 20, 2026
Annual Parental Notification Letter	September 1, 2026
3 Year Reinspection	February 20, 2027

ATTACHMENT A

AHERA SUMMARY TABLE

AHERA 3-Year Reinspection Summary Table
Cardinal O'Connell Alternative School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
1	Pipe Insulation on Boiler Exhaust	Basement – Boiler Room	40 LF	NF	Not Sampled. Assumed ACM	6	Good	Manage in place in accordance with the Asbestos O&M Program. Rooms where vibration is present due to operating mechanical equipment can be inspected regularly for damage, such as every three months by trained maintenance personnel.	
2	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Boiler Room	500 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O& Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	
3	"Aircell" Pipe Insulation	Basement – Hallway by Custodian's Office	4 LF	NF	Not Sampled. Assumed ACM	6	Good	Manage in place in accordance with the Asbestos O&M Program. Pipe insulation in a hallway that is readily accessible to occupants can be inspected regularly for damage, such as every three months by trained maintenance personnel.	
4	Pipe Fitting Insulation	Basement – Storage Room Near Custodian's Office	2 Elbows	NF	Not Sampled Assumed ACM	6	Good	Manage in place in accordance with the Asbestos O&M Program. Do not store ladders, supplies or other equipment near the pipe fitting insulation.	
5	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - Hallways	250 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
6	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Hallways	1000 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
7	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - SW Office	250 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024

AHERA 3-Year Reinspection Summary Table
Cardinal O'Connell Alternative School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
8	Joint Compound Walls (material added per 2024 reinspection)	Basement - SW Office	600 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
9	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - SW Office	200 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
10	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - SW Office Closet	100 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
11	Joint Compound on Walls (material added per 2024 reinspection)	Basement - Custodian	800 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
12	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Custodian	300 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
13	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - CFCE	500 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024

AHERA 3-Year Reinspection Summary Table
Cardinal O'Connell Alternative School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
14	Joint Compound on Walls (material added per 2024 reinspection)	Basement - CFCE	1000 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
15	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - CFCE	425 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
16	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - Conference Room	350 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
17	Joint Compound on Walls (material added per 2024 reinspection)	Basement - Conference Room	750 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
18	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Conference Room	250 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
19	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - Gym	600 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024

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Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
20	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Gym	700 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
21	Joint Compound on Walls (material added per 2024 reinspection)	Basement Hallway off Gym	300 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
22	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	Basement - Rear Storage Areas	300 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
23	Joint Compound on Walls (material added per 2024 reinspection)	Basement - Rear Storage Areas	250 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
24	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Rear Storage Areas	950 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
25	Joint Compound on Walls (material added per 2024 reinspection)	Basement - Girl's Bathroom	150 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

AHERA 3-Year Reinspection Summary Table
Cardinal O'Connell Alternative School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
26	Plaster Skim Coat on Ceilings (material added per 2024 reinspection)	Basement - Girl's Bathroom	250 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
27	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	1st Floor - Principal's Office	450 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
28	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Principal's Office	250 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
29	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	1st Floor Hallway/ Staircase	500 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
30	Joint Compound on Walls (material added in 2024)	1st Floor - Hallway/ staircase	500 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
31	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor Hallway/ Staircase	1300 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

AHERA 3-Year Reinspection Summary Table
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Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
32	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor Hallway/ Staircase	1300 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
33	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Room 1	1150 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
34	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Main Office	1100 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
35	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Main Office Bathroom	250 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
36	Floor Tile	1st Floor – Bathroom in Main Office	15 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	Notify by February 20, 2024, and annually thereafter.
37	Mastic associated with Floor Tile	1st Floor – Bathroom in Main Office	15 SF	NF	Positive per Management Plan records	N/A	NA, not visible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program.	
38	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Room 2	800 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
39	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Room 3	800 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

AHERA 3-Year Reinspection Summary Table
Cardinal O'Connell Alternative School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
Dates of Inspection: 2/21/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
40	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	1st Floor - Room 4	1000 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
41	Joint Compound on Walls (material added per 2024 reinspection)	1st Floor - Room 4	200 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
68	2' x 4' Large Fissure Ceiling Tile (material added per 2024 reinspection)	2nd Floor - Hallway/ Staircase	500 SF	F	2% Chrysotile Asbestos	5	Good	Immediately and annually thereafter notify occupants that the tiles are ACM and should not be disturbed by lifting or moving tile, hanging items from the ceiling tile grid or other activities. Perform an initial cleaning as required by 454 CMR 28(7)(b) that includes HEPA-vacuuming or steam-cleaning of carpets, and HEPA-vacuuming or wet cleaning of all floors and horizontal surfaces below ACM ceiling tiles. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter. Perform initial cleaning by June 30, 2024
69	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Hallway/ Staircase	1300 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
70	Joint Compound on Walls (material added per 2024 reinspection)	2nd Floor - Hallway/ Staircase	700 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
71	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Room 5	1000 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

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Summary Table of Identified and Assumed Asbestos-Containing Building Materials
21 Carter Street, Lowell, MA
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Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
72	Joint Compound on Walls (material added per 2024 reinspection)	2nd Floor - Room 5	300 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
73	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Room 6	850 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
74	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Faculty/Staff Room	1100 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
75	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Faculty/Staff Bathroom	300 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
76	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Offices	650 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
77	Joint Compound on Walls (material added per 2024 reinspection)	2nd Floor - Offices	1000 SF	NF	2% Chrysotile Asbestos (note that associated gypsum board is non-ACM)	5	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls and ceilings and do not disturb the material by hanging items or storing materials against the joint compound. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.
78	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Room 7	1150 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

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Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
79	Plaster Skim Coat on Ceiling and Walls (material added per 2024 reinspection)	2nd Floor - Room 8	850 SF	NF	2% Chrysotile Asbestos (note that plaster base coat is non-ACM)	5	Good	Immediately and annually thereafter notify occupants that the plaster is ACM and should not be disturbed by hanging items or storing materials against plaster. Manage in place in accordance with the Asbestos O&M Program. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	Notify by February 20, 2024, and annually thereafter.

SF = Square Feet

LF = Linear Feet

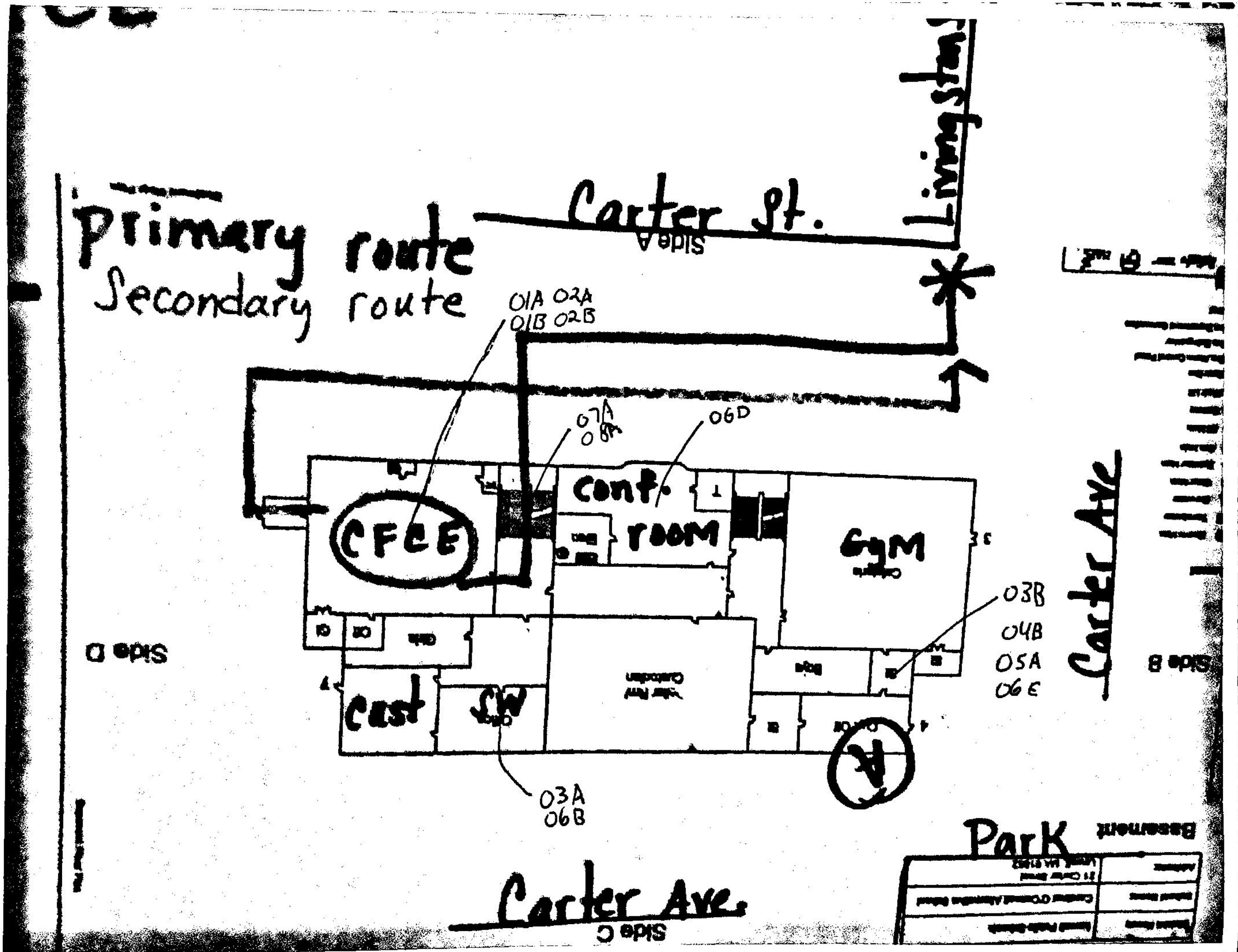
Assumed ACM = This material was not identified in the Management Plan records and was not sampled during the 2024 Re-inspection. Prior to any planned disturbance by maintenance, renovation, or demolition activities, EFI recommends bulk sampling and analysis to determine asbestos content.

For all recommended response actions, the work should be conducted by a Massachusetts licensed Asbestos Contractor and a work plan for the specific repair or removal activity should be prepared by a Massachusetts licensed Asbestos Designer.

Physical Assessment Category
1 – Damaged or Significantly Damaged Thermal System ACM
2 – Damaged Friable Surfacing ACM
3 – Significantly Damaged Surfacing ACM
4 – Damaged or Significantly Damaged Friable Miscellaneous ACM
5 – ACM with Potential for Damage
6 – ACM with Potential for Significant Damage
7 – Any Remaining friable ACM or friable suspect ACM

ATTACHMENT B

SITE PLANS AND 2024 REINSPECTION ASBESTOS BULK SAMPLE LOCATIONS


Primary route
Secondary route
Carter St.
Side A
Livingston
01A 02A
01B 02B
07A
08A
06D
CFCE
Conf. room
Gym
03B
04B
05A
06E
Carter Ave
Side B
Side D
Cust
SW
03A
06B
Park
Basement
Carter Ave.
Side C

District Name:	Lowell Public Schools
School Name:	Cardinal O'Connell Alternative School
Address:	21 Carter Street Lowell, MA 01852

1st Floor

Side C

Carter Ave

Park

Side B

Carter Ave

Side D

Side A

Carter St.

Principal

Room 1

Room 2

Room 3

Room 4

Main Office

St

Vent

T

Legend

- Electric Main
- Transformer
- Generator
- Water Main
- Sprinkler Main
- Gas Main
- Oil Main
- Camera
- Chair Lift
- Knox Box
- Fire Alarm Control Panel
- Fire Extinguisher
- Fire Department Connection
- Ramp

Primary route

Secondary route

Front office

District Name:	Lowell Public Schools
School Name:	Cardinal O'Connell Alternative School
Address:	21 Carter Street Lowell, MA 01852

2nd Floor

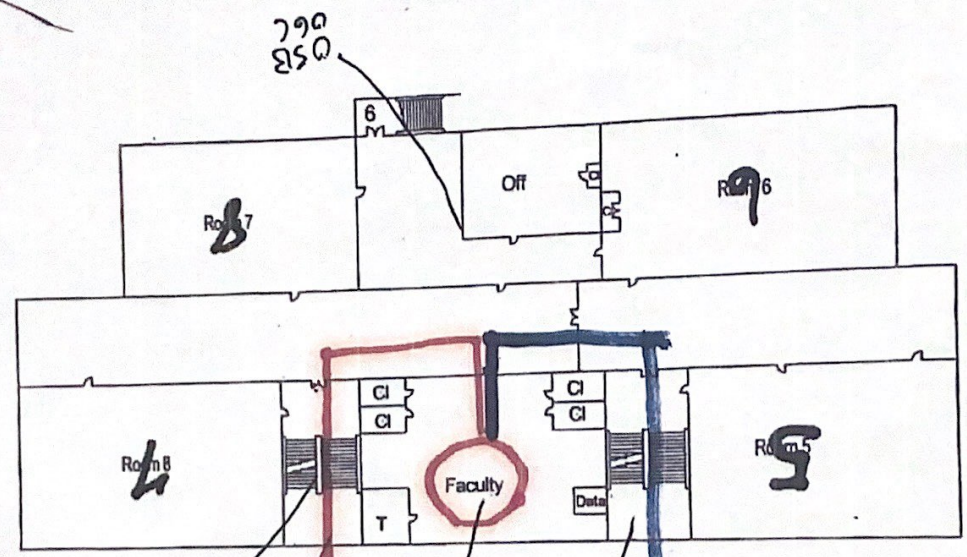
Side C

Carter Ave

Side B

Carter Ave.

Side D



Legend

Carter St.

Side A

Livingston St.

2nd Floor Plan

- Primary route
- Secondary route

Start room

ATTACHMENT C

2024 REINSPECTION ASBESTOS BULK SAMPLE LABORATORY REPORT

EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

Tel/Fax: (781) 933-8411 / (781) 933-8412

http://www.EMSL.com / bostonlab@emsl.com

EMSL Order:	132401072
Customer ID:	EAFI66
Customer PO:	
Project ID:	

Attention:	Derrick Calvario	**Phone:**	(978) 688-3736
	EFI Global, Inc.	**Fax:**	(978) 688-5494
	155 West Street	**Received Date:**	02/23/2024 11:50 AM
	Suite 6	**Analysis Date:**	02/26/2024 - 02/27/2024
	Wilmington, MA 01887	**Collected Date:**	02/22/2024
Project:	014.07795 - Cardinal O'Conell School; Corner of Livingston Street & Carter Avenue		

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**
01A *132401072-0001*	Basement CFCE Area - 12x12 White Floor Tile	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
01B *132401072-0002*	Basement CFCE Area - 12x12 White Floor Tile	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02A *132401072-0003*	Basement CFCE Area - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02B *132401072-0004*	Basement CFCE Area - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
03A *132401072-0005*	SW Office - 2x4 CT Large Fissure	Gray/White Fibrous Homogeneous	85% Min. Wool	13% Non-fibrous (Other)	2% Chrysotile
03B *132401072-0006*	(1st Floor) Rear Basement Hallway - 2x4 CT Large Fissure				Positive Stop (Not Analyzed)
04A *132401072-0007*	4th/3rd Floor Staircase - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
04B *132401072-0008*	(1st Floor) Basement Rear Hallway - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
05A *132401072-0009*	(1st Floor) Basement Hallway - Gypsum Board	Brown/Gray Fibrous Homogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
05B *132401072-0010*	3rd Floor Offices - Gypsum Board	Brown/White Fibrous Homogeneous	15% Cellulose	85% Non-fibrous (Other)	None Detected
06A *132401072-0011*	2nd Floor - Joint Compound	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
06B *132401072-0012*	Basement SW Office - Joint Compound	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
06C *132401072-0013*	3rd Floor Offices - Joint Compound	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
06D *132401072-0014*	Conf Room - Joint Compound	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
06E *132401072-0015*	(1st Floor) Rear Basement Hallway Off Gym - Joint Compound	Tan Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
07A *132401072-0016*	1st Floor/Basement Left Staircase - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/27/2024 15:36:45

EMSL Analytical, Inc.
5 Constitution Way, Unit A Woburn, MA 01801
Tel/Fax: (781) 933-8411 / (781) 933-8412
http://www.EMSL.com / bostonlab@emsl.com

EMSL Order: 132401072
Customer ID: EAFI66
Customer PO:
Project ID:

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**
07B *132401072-0017*	Principal's Office - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07C *132401072-0018*	2nd Floor Main Hallway - Plaster Skim Coat	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
07D *132401072-0019*	3rd Floor Staircase Right - Plaster Skim Coat	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
07E *132401072-0020*	3rd Floor Faculty Room - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07F *132401072-0021*	3rd Floor Offices - Plaster Skim Coat	Tan/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07G *132401072-0022*	3rd Floor Staircase Ceiling - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
08A *132401072-0023*	1st Floor/Basement Left Staircase - Plaster Base Coat	White Fibrous Homogeneous	2% Hair	98% Non-fibrous (Other)	None Detected
08B *132401072-0024*	Principal's Office - Plaster Base Coat	Gray/White Non-Fibrous Homogeneous	<1% Hair	100% Non-fibrous (Other)	None Detected
08C *132401072-0025*	2nd Floor Main Hallway - Plaster Base Coat	White Fibrous Homogeneous	2% Hair	98% Non-fibrous (Other)	None Detected
08D *132401072-0026*	3rd Floor Staircase Right - Plaster Base Coat	Gray Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
08E *132401072-0027*	3rd Floor Faculty Room - Plaster Base Coat	Tan/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
08F *132401072-0028*	3rd Floor Offices - Plaster Base Coat	Gray/White Non-Fibrous Homogeneous	<1% Hair	100% Non-fibrous (Other)	None Detected
08G *132401072-0029*	3rd Floor Staircase Ceiling - Plaster Base Coat	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09A *132401072-0030*	Main Office 2nd Floor - Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09B *132401072-0031*	Main Office 2nd Floor - Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10A *132401072-0032*	2nd Floor Hallway - Ceramic Tile Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10B *132401072-0033*	2nd Floor Hallway - Ceramic Tile Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/27/2024 15:36:45

EMSL Analytical, Inc.
5 Constitution Way, Unit A Woburn, MA 01801
Tel/Fax: (781) 933-8411 / (781) 933-8412
http://www.EMSL.com / bostonlab@emsl.com

EMSL Order:	132401072
Customer ID:	EAFI66
Customer PO:	
Project ID:	

Analyst(s)
John McCarthy (32)

Steve Grise, Laboratory Manager
or Other Approved Signatory

Initial report from: 02/27/2024 15:36:45

OrderID: 132401072

efi global 132401072

BOSTON NORTH
155 West Street | Suite 6 | Wilmington, MA 01887 | PHONE 978.688.3736 | FAX 978.688.5494 | FREE 800.659.1202

BULK SAMPLE CHAIN OF CUSTODY FORM

Report to (Inspector Name):	Derrin Calvano	**Bill To:**	Accounts Payable
Company:	EFI Global, Inc.	**Address:**	Same
Address:	155 West Street	**City, State, Zip:**	Same
	Suite 6	**Telephone:**	800-659-1202
City, State, Zip:	Wilmington, MA 01887	**Email:**	US-EFIGlobal-BostonEnviroPC@efiglobal.com
Inspector Cell:	781-825-5012		

Project Information

Project No./ Description:	014.07795 – Cardinal O'Connell School
Email Report to:	Derrin.Calvano@efiglobal.com → Corner of Livingston and Carter Ave
Alternate:	Lowell, MA

Requested Turnaround Time:

☐ RUSH (6hr)	☐ 1 day (24hr)	☐ 2 day (48hr)	☒ 3 day (72hr)	☐ 5 day

Media and Methodology

Type of Analysis:	PLM	**Check for Positive Stop:**	☒
Notes:	Analyze all plaster and joint compound samples	**Date Collected:**	2/22/24

Sample ID	Type of Material	Location
01A	12x12 white fitile	Basement CFCE area
01B	" "	" "
02A	Yellow tile mastic	" "
02B	" "	" "
03A	2x4 CT large fissure ~~fissure~~	SW office
03B	" "	rear (1st fl) basement hallway
04A	2x4 CT Pinhole	~~SW office~~ 4th/3rd fl Staircase
04B	" "	(1st fl) Basement rear hallway
05A	GYP Sum board	(1st fl) Basement hallway
05B	" "	3rd fl offices

Total Number of Samples Submitted: 33

Samplers Name: Derrin Calvano Samplers Signature: [signature]

Relinquished By (Client): [signature] Date: 2/23/24 Time: 1150

RECD EMSL-BOSTON FEB 23 2024

Received By (Lab): [signature] Date: [illegible] Time: [illegible]

efi global 132401072

Sample ID	Type of Material	Location
06A	Joint Compound	~~Basement hallway~~ ~~2nd~~ 3rd fl
06B	" "	Basement Stu office
06C	" "	~~Basement Custodian office~~ 3rd fl offices
06D	" "	Conf room
06E	" "	Near basement (1st fl) hallway & ff gym
07A	Plaster Skim Coat	1st fl/Basement left Staircase
07B	" "	Principals office
07C	" "	~~1st~~ 2nd fl Main hallway
07D	" "	3rd fl Staircase right
07E	" "	3rd fl faculty rm
07F	" "	3rd fl offices
07G	" "	3rd fl Staircase Ceiling
08A	Plaster Base Coat	1st fl/Basement left Staircase
08B	" "	Principals office
08C	" "	~~1st~~ 2nd fl main hallway
08D	" "	3rd fl Staircase right
08E	" "	3rd fl faculty rm
08F	" "	3rd fl offices
08G	" "	3rd fl Staircase Ceiling
09A	Yellow mastic	Main office 2nd fl
09B	" "	" " "
10A	Ceramic tile grout	2nd fl hallway
10B	" "	" "

REC'D EMSL-BOSTON FEB 23 2024

ATTACHMENT D

LICENSES AND TRAINING CERTIFICATES OF ASBESTOS INSPECTOR & MANAGEMENT PLANNER

efi global

BOSTON NORTH

March 13, 2024

Rick Underwood
Director of Operations & Maintenance
Lowell Public Schools
155 Merrimack Street, 4th Floor
Lowell, Massachusetts 01852

via email: runderwood@lowell.k12.ma.us

RE: AHERA 3-Year Reinspection
Peter W. Reilly Elementary School
115 Douglas Road
Lowell, Massachusetts
EFI Project No. 014.07795

Dear Mr. Underwood:

EFI Global Inc. (EFI) is pleased to present this AHERA 3-Year Reinspection Report prepared for the Peter W. Reilly Elementary School located at 115 Douglas Road, Lowell, Massachusetts (Site). The reinspection site visit was conducted on February 20, 2024, and the corresponding report was completed in accordance with the United States Environmental Protection Agency (USEPA) Asbestos Hazard Emergency Response Act (AHERA) regulations (40 CFR 763) and Massachusetts Department of Labor Standards "Requirements for Schools Subject to AHERA" regulations (454 CMR 28.13).

EFI relied upon previous 3-Year Inspection and Management Plan Update report from 2014 prepared by Cardo ATC, and 2017 and 2020 reinspection's prepared by EFI Global Inc. The original AHERA Management Plan and other subsequent records were not made available at the school for review. EFI relied upon the 2020 table of identified ACM for this reinspection. The school's Management Plan and records should be located and kept on file at the school and the administrative offices.

EFI is pleased to provide environmental consulting services to Lowell Public Schools. This report should be kept on file with the school's AHERA records. If you have any questions regarding the contents of this report, or need of additional information, please contact either of the undersigned at (800) 659-1202. Thank you for the opportunity to serve your environmental needs.

Sincerely,
EFI Global, Inc.

Derrick Calvario
Project Manager
MA Asbestos Inspector # AI 900703

Michael McCarter
Senior Project Manager
MA Asbestos Management Planner #AP 035661

AHERA 3-YEAR REINSPECTION

FOR:

PETER W. REILLY ELEMENTARY SCHOOL
115 DOUGLAS ROAD
LOWELL, MASSACHUSETTS

PREPARED BY:

efi global
BOSTON NORTH

155 WEST STREET, SUITE 6
WILMINGTON, MASSACHUSETTS 01887

EFI PROJECT NUMBER 014.07795

March 13, 2024

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INTRODUCTION

EFI Global, Inc. (EFI) was retained by Lowell Public Schools to perform a 3-Year AHERA Reinspection in accordance with United States Environmental Protection (USEPA) Asbestos Hazard Emergency Response Act (AHERA) asbestos regulations (40 CFR 763) and Massachusetts Department of Labor Standards "Requirements for Schools Subject to AHERA" regulations (454 CMR 28.13). These regulations, commonly known as the "Asbestos in Schools Rule," require under 40 CFR 763.80 and 454 CMR 28.13(2)(b)(1) that local education agencies (LEAs) must conduct a reinspection at least once every three years of all friable and nonfriable known or assumed asbestos-containing materials (ACMs). The reinspection includes all previously known and assumed ACMs, as well as any additional suspect ACM not previously included, as required by 40 CFR 763.80 and 454 CMR 28.13 in each school building leased, owned, or otherwise used as a school building. A school building is defined in 454 CMR 28.02 as including each of the following:

- Any structure suitable for use as a classroom, including a school facility such as a library, school eating facility, or facility used in the preparation of food
- Any gymnasium or other facility which is specially designed for athletic or recreational activities for an academic course in physical education
- Any other facility used for the instruction or housing of students or for the administration of educational or research programs
- Any maintenance, storage, or utility facility, including any hallway, essential to the operation of any facility described as a school building above
- Any portico or covered exterior hallway or walkway
- Any exterior portion of a mechanical system used to condition interior space.

EFI conducted a 3-year AHERA reinspection at the Peter W. Reilly Elementary School, which involved determining the condition and hazard potential of previously known and assumed ACMs, and additional confirmed and assumed ACMs observed during the 2024 reinspection. The 3-year reinspection was conducted on February 20, 2024, by Derrick Calvario and Emma Cypherd, both EPA accredited, and Massachusetts Department of Labor Standards (MADLS) licensed Asbestos Inspectors, (license numbers AI-900703 and license number AI-901189, respectively. EFI relied upon the previous 3-year AHERA reinspection report conducted by EFI in 2020. The original AHERA Management Plan and subsequent records were not made available at the school for review. The recommended response actions were prepared by MADLS-licensed Asbestos Management Planner Michael McCarter (AP-035661).

A summary of known and assumed ACM within the Peter W. Reilly Elementary School is presented in the AHERA Summary Table in **Attachment A**. Site Plans showing buildings and locations referenced in this report are presented in **Attachment B.**

The Designated Person for the Lowell Public Schools is Rick Underwood, who provided EFI with AHERA documentation for review. Rick's contact information is:

Rick Underwood
Director of Operations & Maintenance
Lowell Public Schools
155 Merrimack Street, 4th Floor
Lowell, Massachusetts 01852
978-674-4328
runderwood@lowell.k12.ma.us

AHERA 3-YEAR REINSPECTION

A. AHERA Records Review

As part of this 3-year reinspection, EFI reviewed available AHERA records for the school, in accordance with the AHERA regulation and 454 CMR 28.13(5)(f). A summary of records reviewed is provided in the table below.

Review of AHERA Documentation Peter W. Reilly Elementary School 115 Douglas Road, Lowell, Massachusetts		
Document/Record	**Present?**	**Comment**
Asbestos Management Plan (on hand at school and available for review)	No	No records available at the school for review. The Cardo ATC 2014 3-Year Reinspection and Updated Management Plan is posted on the schools web site.
Designated Person Training Records (for Rick Underwood)	No	No records available at the school for review. Designated Person should receive formal designated person training or review the Designated Person Self Study Guide (available at https://www.epa.gov/sites/default/files/2015-01/documents/dp_study_guide_0.pdf).
Custodial Personnel 2-hour Awareness Training Records	No	No records available at the school for review.
Annual Parental Notification Records	No	No records available at the school for review. Annual notification letters should be sent and copies kept on file with the AHERA records.
Abatement/Response Action Records (includes abatement, special cleaning activities & small scale short duration (SSSD) activities and associated monitoring reports and work plans)	No	No records available at the school for review.
Designated Person True and Correct Statement	No	No records available at the school for review.
6-month Surveillance Inspection Records	No	No records available at the school for review.
Previous 3-Year Reinspection Records	No	No records available at the school for review.
Asbestos Labels present (required in routine maintenance areas)	No	No labeling observed. Labels should be placed immediately adjacent to ACM present in routine maintenance areas (i.e., boiler rooms, utility closets, etc.)

B. ACM Application Types

ACMs are divided into the following application types:

Thermal system insulation (TSI): Insulation applied to mechanical, heating, and cooling systems such as pipes, boilers, flue breechings, ducts, tanks and fittings.

Surfacing Materials: Material that is spray-applied or trowel-applied to walls, ceilings or structural components (i.e., plasters, acoustical finishes and fireproofing).

Miscellaneous Materials: All other asbestos materials, including but not limited to floor tiles and mastic, ceiling tiles, vinyl cove base and mastic, gypsum board and joint compound, and asbestos-cement board, etc.

C. ACM Assessment Criteria

The assessment is divided into two categories - the physical assessment and the hazard potential assessment.

Physical Assessment

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

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

Hazard Assessment

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

Hazard Rank #1 – Good condition/Low potential for disturbance
Hazard Rank #2 – Good condition/ Moderate potential for disturbance
Hazard Rank #3 – Good condition/ High potential for disturbance
Hazard Rank #4 – Damaged condition/Low potential for disturbance
Hazard Rank #5 – Damaged condition/Moderate potential for disturbance
Hazard Rank #6 – Damaged condition/High potential for disturbance
Hazard Rank #7 – Significantly damaged condition

The following is the Assessment Criteria used during the inspection:

1. Homogeneous Areas (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) were quantified by location and assessed by condition. Materials are listed as friable or non-friable. Note: friable materials are materials that can be crushed and pulverized to dust by hand pressure. A general condition description for suspect materials used in this inspection is as follows:

    a. Damaged Surfacing ACM: That material which has deterioration, delamination, water damage, lacks cohesion, is blistered, crumbling, gouged, marred heavily, abraded, or in any way has lost its structural integrity over more than 1% but less than 10 % of the total surface area if the damage is evenly distributed or less than 25%, if the damage is localized in one area of the homogeneous area.

    b. Significantly Damaged ACM: That material which has deterioration, delamination, water damage, lacks cohesion, is blistered, crumbling, gouged, marred heavily, abraded, or in any way has lost its structural integrity over at least 10% of the surface area if the damage is evenly distributed or at least 25% if the damaged is localized.

    c. Good Condition ACM: ACM with no visible damage or deterioration in less than one percent of the material and/or coverings.

    d. ACM with potential for damage: Pertains to circumstances in which:

        i. Friable ACM is in an area regularly used by building occupants, including maintenance workers, currently in intact (good) condition.

        ii. There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated or delaminated due to factors such as changes in building use, changes in O&M practices, changes in occupancy or recurrent damage.

Note: All ACM in good condition is still considered to have a potential for damage, and in certain instances, has the potential for significant damage.

    e. ACM with potential for significant damage: Pertains to circumstances in which:

        i. Friable ACM is in an area regularly used by building occupants, including maintenance personnel.

        ii. Indications show that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in O&M practices, changes in occupancy or re-occurring damage.

        iii. The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or under certain circumstances, vibration or air erosion.

D. Response Actions – General Recommendations

Specific response actions for each known and assumed ACM located at the Peter W. Reilly Elementary School are located in **Attachment A**. The following are general recommendations for response actions associated with managing ACMs at the school.

1. Damaged materials in the school should be repaired, if feasible, or removed in order to maintain compliance with the AHERA regulations. Damaged ACMs of any quantity listed in the report should be repaired or removed by a Massachusetts licensed Asbestos Contractor following all applicable regulations, in accordance with a work plan design, and final clearance air testing performed in accordance with the AHERA regulations. It is the policy of the Lowell Public Schools to use licensed Asbestos Contractors for all response action work.

2. The AHERA regulation states that the response actions chosen for other than small scale/short duration repairs (less than 3 square or linear feet), must be designed and conducted by persons accredited to design and conduct response actions. MADLS Regulation 454 CMR 28.00 requires the services of licensed Project Designers who meet the requirements set forth in 454 CMR 28.00, as well as Massachusetts licensed Asbestos Contractors.

3. Damaged ACMs that involve small scale/short duration repairs can only be conducted by 16-hour asbestos-trained personnel or by a licensed Asbestos Contractor. EFI understands that small scale/ short duration projects will not be performed by in house personnel, and that all work will be conducted by an outside licensed Asbestos Contractor.

4. Each known and assumed ACM should be monitored for any changes in condition during the six-month periodic surveillance, or more frequently.

5. If known or suspect ACMs are to be impacted by planned renovation or demolition activities, the ACM must be removed by a Massachusetts licensed Asbestos Contractor. Note that AHERA inspections do not meet the EPA NESHAP and Commonwealth of Massachusetts Department of Environmental Protection (MADEP) requirements for a comprehensive pre-renovation or demolition survey. Prior to any planned renovation or demolition project, all renovation/demolition areas must be thoroughly surveyed to meet the requirements of EPA NESHAP and MADEP 310 CMR 7.15(4) Survey Requirements. LEA Designated Persons should make sure that pre-renovation/demolition surveys are performed in each instance that ACM may be disturbed.

E. AHERA Licensing & Training Documentation

The AHERA 3-year Reinspection report for the Peter Reilly W. School was performed by the following individuals who have received appropriate training and who are MADLS licensed personnel:

Derrick Calvario
Project Manager
MA Asbestos Inspector # AI 900703

Michael McCarter
Senior Project Manager
MA Asbestos Management Planner #AP 035661

F. Asbestos Bulk Sampling

Asbestos bulk sampling of suspect ACM was performed for various suspect ACMs not previously identified as ACM in portions of the building included in the AHERA program. The bulk sampling by USEPA-accredited and MADLS-licensed Asbestos Inspectors Derrick Calvario and Emma Cypherd. A total of 103 bulk samples of suspect ACMs were collected and transported under chain of custody protocol to EMSL Analytical, Inc., of Woburn, Massachusetts, a Massachusetts-licensed laboratory. EMSL is accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) for bulk asbestos fiber analysis, which is administered by the National Institute of Standards and Testing (NIST).

Samples were analyzed with a standard 3-day turnaround time using polarized light microscopy (PLM) in accordance with United States Environmental Protection Agency (USEPA) Method 600/R-93/116. The PLM/DS analytical method is modeled after 40 CFR Part 763, Subpart F, Attachment A: "Interim Method for the Determination of Asbestos in Bulk Insulation Samples." MADEP asbestos regulations define an ACM as any material containing greater than or equal to one percent asbestos. The findings of this report are based upon observations of accessible materials and the analysis of representative bulk samples collected. **Attachment B** contains site plans indicating locations of samples collected and analyzed as part of this reinspection. A copy of the asbestos laboratory reports is presented in **Attachment C**.

Bulk samples representing individual homogenous areas of suspect ACM, (materials that are determined to be uniform in color and texture and installed in the same construction period) were collected in a randomly distributed manner, in accordance with the EPA sampling protocol outlined in 40 CFR 763.

The following suspect ACMs sampled by EFI during the 2024 reinspection were reported by EMSL as containing no detectable concentration of asbestos:

Summary of Non-ACMs per 2024 3-Year Reinspection

Material Description	Location(s) Sampled
Ceiling Texture	Main Lobby/ Entrance
Yellow Carpet Mastic	Office Off Main Lobby, Storage Off Room Next to Literature Room
1’ x 1’ Brown Floor Tile Under Carpet	Office Off Main Lobby
Yellow Mastic associated with 1’ x 1’ Brown Floor Tile Under Carpet	Office Off Main Lobby
2” x 4” Ceiling Tile Pinhole	Hallway Side D, Music Room
Plaster Skim Coat	Kitchen Rear Right Storage Room, Room 407, Hallway Side A, Room 104, Hallway Side D
Plaster Base Coat	Kitchen Rear Right Storage Room, Room 407, Hallway Side A, Room 104, Hallway Side D
Gypsum Board	Room Next to Literature Room, Library
Joint Compound	Room Next to Literature Room, Library
2” x 4” Ceiling Tile Crows Feet	Hallway Side D/C Intersection, Room 407
1’ x 1’ Gray Floor Tile with White Speckle	Library

Material Description	Location(s) Sampled
Yellow Mastic associated with 1’ x 1’ Gray Floor Tile with White Speckle	Library
Brown Floor Leveler	Library
Cove Base	Library, K1
Tan Mastic associated with Cove Base	Library, K1
2’ x 2’ Ceiling Tile Pinhole	Library, Hallway Side A
2’ x 2’ Ceiling Tile Crows Feet	Room 104, Literature Room
Brown Felt/Roofing	Library
1’ x 1’ Light Blue Floor Tile with White and Blue Streak	Literature Room
Yellow Mastic associated with 1’ x 1’ Light Blue Floor Tile with White and Blue Streak	Literature Room
White Floor Leveler	Storage Room Off Literature Room
Cork Board	Hallway Side C
Black Mastic associated with Cork Board	Hallway Side C
6” x 6” Brown Ceramic Floor Tile Grout	Room 019
Black Mastic	Room 405, Room 402
White Ceramic Floor Tile Grout	Staff Bath
Black Mastic associated with 1’ x 1’ Black Floor Tile Under Red 1’ x 1’ Floor Tile	Room 403
1’ x 1’ White Floor Tile with color	Room 306
1’ x 1’ White Floor Tile with Tan Speckle	Room 302
Cove Base Brittle	Hallway Side A, Pre-k-3
Black Mastic associated with Cove Base Brittle	Hallway Side A, Pre-k-3
1’ x 1’ Ceiling Squares Pinhole	Room Ck-4 CS1-2, K1
Felt Backing above Wood Ceiling	Hallway Side B
1’ x 1’ Light Blue Floor Tile with Speckle	Room 101, K2
1’ x 1’ White Floor Tile with Streak	Main Offices
Blue Epoxy Sheet Flooring	RN Office
1’ x 1’ Tan Floor Tile	Room 205
Residual Black Mastic associated with 1’ x 1’ Tan Floor Tile	Room 205
Gray Door Caulking	Exterior Door 1
Brown Door Caulking	Exterior Door 2
Brown Window Caulking	Exterior North windows, Exterior West Windows

G. ACM Hazard Assessment & Recommended Response Actions

Accessible locations were inspected and assessed to determine the presence and condition of known and assumed ACM. A Summary Table of known and assumed ACMs present at the school, the physical and hazard assessments and the recommended response action for each ACM, is presented in **Attachment A.** It should be noted that EFI did not conduct destructive evaluations of the school building to identify suspect ACM. Per USEPA NESHAP and MADEP asbestos regulations, a thorough “path of construction”

survey should be conducted prior to any renovation or repair activities that may impact suspect ACM, regardless of the date of installation.

H. Cost Estimate and Schedule for Recommended Response Actions

The confirmed and assumed ACMs outlined in the summary table in **Attachment A** that were in good condition at the time of the reinspection must be maintained in place in accordance with the Operations and Maintenance Plan. Estimated costs associated with managing known and assumed ACMs at the school are summarized below.

Cost Estimate of AHERA Considerations Peter W. Reilly Elementary School 115 Douglas Road, Lowell, Massachusetts	
Training Costs	
Item	**Approximate Cost**
2-hour asbestos awareness training (New Hires, within 60 days of hire)	$500/person
Designated Person Training	$250
Maintenance Costs	
Item	**Approximate Cost**
Asbestos labeling (Place/maintain labels adjacent to ACM in routine maintenance areas)	$500
6-month surveillance inspections (Per schedule below)	$500/event
3-year re-inspection (Per schedule below)	$2,000
Response Action Costs	
Item	**Approximate Cost**
No Recommended Response Actions	N/A

A proposed schedule of events between this 3-Year reinspection and the 2027 3-Year reinspection is provided for your use:

Schedule of AHERA-Related Actions Peter W. Reilly Elementary School 115 Douglas Road, Lowell, Massachusetts	
Event	**Completion Date**
6 Month Surveillance Inspection	August 20, 2024
Annual Parental Notification Letter	September 1, 2024
6 Month Surveillance Inspection	February 20, 2025
6 Month Surveillance Inspection	August, 2025
Annual Parental Notification Letter	September 1, 2025
6 Month Surveillance Inspection	February 20, 2026
6 Month Surveillance Inspection	August 20, 2026
Annual Parental Notification Letter	September 1, 2026
3 Year Reinspection	February 20, 2027

ATTACHMENT A

AHERA SUMMARY TABLE

AHERA 3 Year Reinspection Summary Table
Peter W. Reilly Elementary School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
115 Douglas Road, Lowell, MA
Dates of Inspection: 2/20/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
1	Flex Joint	Boiler Room Mezzanine	4 Joints	NF	Positive per Management Plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Rooms where vibration is present due to operating mechanical equipment can be inspected more frequently, such as every 3 months, by trained maintenance personnel.	
2	9" x 9" Brown Floor Tile	Custodian Office	15 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
3	Mastic associated with 9" x 9" Brown Floor Tile (added per 2024 reinspection)	Custodian Office	15 SF	NF	Not sampled. Assumed AC	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
4	Pipe thread sealant (added per 2024 reinspection)	Boiler Room	200 SF	NF	Not sampled. Assumed ACM	5	Good	Material was observed to be exposed in the boiler room. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
5	Grey duct seam sealant (added per 2024 reinspection)	Boiler Room	100 SF	NF	Not sampled. Assumed ACM	5	Good	Material was observed to be exposed in the boiler room. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
6	Flex Joint	Roof Room (above Gym Storage)	4 Joints	NF	Positive per Management Plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Rooms where vibration is present due to operating mechanical equipment can be inspected more frequently, such as every 3 months, by trained maintenance personnel.	
7	"Transite" Wall Panels	Roof Room (above Gym Storage)	750 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Do not store ladders, equipment, or other objects near "transite" wall panels.	
8	Vinyl countertop (added per 2024 reinspection)	Room K01	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
9	Black sink undercoat (added per 2024 reinspection)	Room K02	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
10	Vinyl countertop (added per 2024 reinspection)	Room k02	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
11	Black sink undercoat (added per 2024 reinspection)	Room K03	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
12	Vinyl countertop (added per 2024 reinspection)	Room K03	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	

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13	1' x 1' Red Floor Tile	Room K04	950 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
14	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room K04	950 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for viewing	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
15	Black sink undercoat (added per 2024 reinspection)	Room K04	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
16	Vinyl countertop (added per 2024 reinspection)	Room K04	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
17	1' x 1' Red Floor Tile	Room K05	950 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
18	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room K05	950 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for viewing	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
19	Black sink undercoat (added per 2024 reinspection)	Ck4 CSA-2	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
20	Black sink undercoat (added per 2024 reinspection)	Pre-K03	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
21	Black sink undercoat (added per 2024 reinspection)	Room 101	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
22	Vinyl countertop (added per 2024 reinspection)	Room 101	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	

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23	Black sink undercoat (added per 2024 reinspection)	Room 102	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
24	Vinyl countertop (added per 2024 reinspection)	Room 102	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
25	Black sink undercoat (added per 2024 reinspection)	Room 103	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
26	Black sink undercoat (added per 2024 reinspection)	Room 104	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
27	Vinyl countertop (added per 2024 reinspection)	Room 104	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
28	9” x 9” Brown Floor Tile	Room 201	550 SF	NF	Positive per Management Plan records	5	Good condition overall. ~1 square foot of cracked but intact floor tile	Good condition overall with minor cracking. Monitor to determine condition does not worsen. Manage in place in accordance with the Asbestos O&M Program or replace with new non-ACM flooring. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
29	Mastic associated with 1’ x 1’ Red Floor Tile (added per 2024 reinspection)	Room 201	550 SF	NF	Not sampled. Assumed ACM.	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
30	Vinyl countertop (added per 2024 reinspection)	Room 202	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
31	9” x 9” Brown Floor Tile	Room 203	525 SF	NF	Positive per Management Plan records	5	Good condition overall. ~1 square foot of cracked but intact floor tile.	Good condition overall with minor cracking. Monitor to determine condition does not worsen. Manage in place in accordance with the Asbestos O&M Program or replace with new non-ACM flooring. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	

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Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
32	Mastic associated with 9" x 9" Brown Floor Tile (added per 2024 reinspection)	Room 203	525 SF	NF	Not sampled. Assumed ACM.	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
33	Black sink undercoat (added per 2024 reinspection)	Room 203	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
34	9" x 9" Tan/Green Floor Tile	Room 204	950 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
35	Mastic associated with 9" x 9" Tan/Green Floor Tile (added per 2024 reinspection)	Room 204	950 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
36	Black sink undercoat (added per 2024 reinspection)	Room 204	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
37	Vinyl countertop (added per 2024 reinspection)	Room 204	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
38	Vinyl countertop (added per 2024 reinspection)	Room 205	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
39	Grey sink undercoat (added per 2024 reinspection)	Room 206	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
40	Vinyl countertop (added per 2024 reinspection)	Room 206	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
41	1' x 1' Red Floor Tile	Room 207	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	

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68	Mastic associated with 9" x 9" Tan/Green Floor Tile (added per 2024 reinspection)	Room 207	1,080 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
69	Black sink undercoat (added per 2024 reinspection)	Room 207	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
70	Vinyl countertop (added per 2024 reinspection)	Room 207	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
71	1' x 1' Red Floor Tile	Room 301	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
72	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 301	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
73	1' x 1' Red Floor Tile	Room 302	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
74	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 302	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
75	Grey sink undercoat (added per 2024 reinspection)	Room 302	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
76	1' x 1' Red Floor Tile	Room 303	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
77	Mastic associated with 1' x 1' Red Floor Tile	Room 303	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	

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78	1' x 1' Red Floor Tile	Room 304	840 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
79	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection	Room 304	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
80	Grey sink undercoat (added per 2024 reinspection)	Room 304	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
81	1' x 1' Red Floor Tile	Room 305	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
82	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 305	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
83	Grey sink undercoat (added per 2024 reinspection)	Room 305	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
84	Grey sink undercoat (added per 2024 reinspection)	Room 306	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
85	1' x 1' Red Floor Tile	Room 307	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
86	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 307	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
87	Grey sink undercoat (added per 2024 reinspection)	Room 307	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	

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88	1' x 1' Red Floor Tile	Room 401	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
89	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 401	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
90	Grey sink undercoat (added per 2024 reinspection)	Room 401	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
91	Pipe Fitting Insulation	Hall Outside Room 401	6 Elbows	NF	Positive per Management Plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Pipe fittings that are easily accessible to students can be inspected regularly, such as every 3 months, by trained maintenance personnel.	
92	1' x 1' Red Floor Tile	Room 402	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
93	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 402	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
94	Grey sink undercoat (added per 2024 reinspection)	Room 402	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
95	1' x 1' Red Floor Tile	Room 403	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
96	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 403	1,080 SF	NF	Not Sampled. Assumed ACM	N/A	N/A, material not accessible	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	

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97	1' x 1' Black floor tile below 1' x 1' Red Floor Tile (material added in 2024)	Room 403	1,080 SF	NF	5% Chrysotile Asbestos (associated mastic is non-ACM per bulk sample results from 2024)	N/A	N/A, material not accessible for inspection (except for single location sampled)	The bottom layer of floor tile is not visible for inspection. Maintain top layer of floor tile in good condition in accordance with the O&M Program.	
98	Grey sink undercoat (added per 2024 reinspection)	Room 403	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
99	1' x 1' Red Floor Tile	Room 404	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
100	Mastic associate with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 404	1,080 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
101	Grey sink undercoat (added per 2024 reinspection)	Room 404	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	
102	Pipe Fitting Insulation	Hall Outside Room 404	4 Elbows	NF	Positive per Management Plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Pipe fittings that are easily accessible to students can be inspected regularly, such as every 3 months, by trained maintenance personnel.	
103	1' x 1' Red Floor Tile	Room 405	1,080 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
104	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	Room 405	1,080 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
105	Grey sink undercoat (added per 2024 reinspection)	Room 405	1 Unit	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Stored items below the sink should avoid contact with basin coating. Collect bulk samples to determine asbestos content prior to any disturbance.	

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106	Pipe Fitting Insulation	Hall Outside Room 405	3 Elbows	NF	Positive per Management Plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Pipe fittings that are easily accessible to students and can be inspected regularly, such as every 3 months, by trained maintenance personnel.	
107	Floor Tile below Carpet	Room 407	180 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	N/A	N/A, material not accessible (except for single location inspected)	Maintain carpet in good condition. Use care when lifting carpet to not disturb floor tile. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
108	Mastic associated with Floor Tile below Carpet (added per 2024 reinspection)	Room 407	180 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible	Maintain carpet in good condition. Use care when lifting carpet to not disturb floor tile. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
109	Floor Tile below Carpet	Room 409	200 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	N/A	N/A, material not accessible (except in single location inspected)	Maintain carpet in good condition. Use care when lifting carpet to not disturb floor tile. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
110	Mastic associated with Floor Tile below Carpet (added per 2024 reinspection)	Room 409	200 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible	Maintain carpet in good condition. Use care when lifting carpet to not disturb floor tile. Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
111	1' x 1' Red Floor Tile	New Office (formerly part of Main Office Lobby)	220 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity. Lastly, consider using chair glides to minimize potential for gauging or scratching tile.	
112	Mastic associated with 1' x 1' Red Floor Tile (added per 2024 reinspection)	New Office (formerly part of Main Office Lobby)	220 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
113	9" x 9" Brown Floor Tile	Bathroom in Principal's Office	15 SF	NF	Positive per Management Plan records	5	Good	Manage in place in accordance with the Asbestos O&M Program. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity.	

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115 Douglas Road, Lowell, MA
Dates of Inspection: 2/20/2024

Item	Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
114	Mastic associated with 9" x 9" Brown Floor Tile (added per 2024 reinspection	Bathroom in Principal's Office	15 SF	NF	Not sampled. Assumed AC	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
115	9" x 9" Tan/Brown Floor	Bathroom in Assistant Principal's Office	15 SF	NF	Positive per Management Plan records	5	Overall good condition, but some minor cracked but intact tile.	Good condition overall with minor cracking. Monitor to determine condition does not worsen. Manage in place in accordance with the Asbestos O&M Program or replace with new non-ACM flooring. Floor tile should be maintained in accordance with EPA and OSHA guidelines. Strip floors when wet using low abrasive pads and low speed buffers (175- 300 rpm), and regularly clean and maintain flooring with wax coating to maximize longevity.	
116	Mastic associated with 9" x 9" Tan/Brown Floor Tile	Bathroom in Assistance Principal's Office	15 SF	NF	Not sampled. Assumed AC	N/A	N/A, material not accessible for inspection	Mastic is not visible. Maintain floor tile in good condition in accordance with the O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
117	White backer board mastic (added per 2024 reinspection)	Women's room off cafeteria	200 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for inspection	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
118	White backer board mastic (added per 2024 reinspection)	Men's room off music room	200 SF	NF	Not sampled. Assumed ACM	N/A	N/A, material not accessible for inspection	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	
119	Vinyl countertop (added per 2024 reinspection)	Art room	10 SF	NF	Not sampled. Assumed ACM	5	Good	Manage in place in accordance with the Asbestos O&M Program. Collect bulk samples to determine asbestos content prior to any disturbance.	

SF = Square Feet

Assumed ACM = This material was not identified in the Management Plan records and was not sampled during the 2024 Re-inspection. Prior to any planned disturbance by maintenance, renovation, or demolition activities, EFI recommends bulk sampling and analysis to determine asbestos content.

For all recommended response actions, the work should be conducted by a Massachusetts licensed Asbestos Contractor and a work plan for the specific repair or removal activity should be prepared by a Massachusetts licensed Asbestos Designer.

Physical Assessment Category
1 – Damaged or Significantly Damaged Thermal System ACM
2 – Damaged Friable Surfacing ACM
3 – Significantly Damaged Surfacing ACM
4 – Damaged or Significantly Damaged Friable Miscellaneous ACM
5 – ACM with Potential for Damage
6 – ACM with Potential for Significant Damage
7 – Any Remaining friable ACM or friable suspect ACM

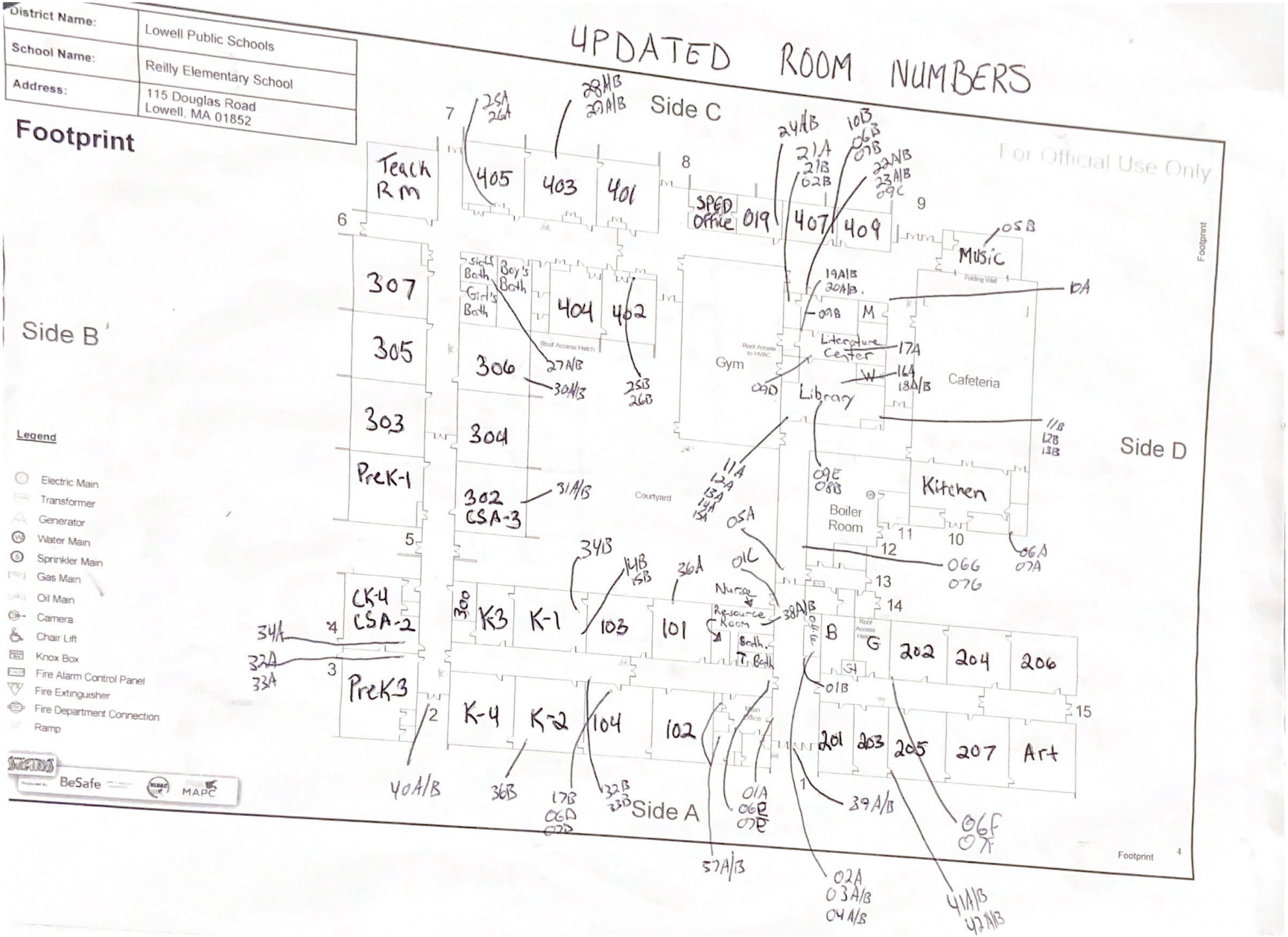
ATTACHMENT B

SITE PLANS AND BULK SAMPLE LOCATION PLANS

District Name:	Lowell Public Schools
School Name:	Reilly Elementary School
Address:	115 Douglas Road Lowell, MA 01852

Footprint

UPDATED ROOM NUMBERS



ATTACHMENT C

2024 REINSPECTION ASBESTOS BULK SAMPLE REPORTS

EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

Tel/Fax: (781) 933-8411 / (781) 933-8412

http://www.EMSL.com / bostonlab@emsl.com

EMSL Order:	132401076
Customer ID:	EAFI66
Customer PO:	
Project ID:	

Attention:	Derrick Calvario	**Phone:**	(978) 688-3736
	EFI Global, Inc.	**Fax:**	(978) 688-5494
	155 West Street	**Received Date:**	02/23/2024 11:50 AM
	Suite 6	**Analysis Date:**	02/28/2024
	Wilmington, MA 01887	**Collected Date:**	02/20/2024
Project:	014.07795 - Riley School; 115 Douglas Road; Lowell, MA		

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**
01A *132401076-0001*	Main Lobby/Entrance - Ceiling Texture on Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
01B *132401076-0002*	Main Lobby/Entrance - Ceiling Texture on Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
01C *132401076-0003*	Main Lobby/Entrance - Ceiling Texture on Plaster	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02A *132401076-0004*	Office Off Main Lobby - Yellow Carpet Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02B *132401076-0005*	Storage Off Room next to Literature Room - Yellow Carpet Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
03A *132401076-0006*	Office Off Main Lobby - 12x12 Brown Floor Tile under Carpet	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
03B *132401076-0007*	Office Off Main Lobby - 12x12 Brown Floor Tile under Carpet	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
04A *132401076-0008*	Office Off Main Lobby - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
04B *132401076-0009*	Office Off Main Lobby - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
05A *132401076-0010*	Hallway Side D - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
05B *132401076-0011*	Music Room - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
06A *132401076-0012*	Kitchen Rear Right Storage Room - Plaster Skim Coat Ceiling	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06B *132401076-0013*	Room 407 - Plaster Skim Coat Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06C *132401076-0014*	Center Hallway Side A - Plaster Skim Coat Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06D *132401076-0015*	Room 104 - Plaster Skim Coat Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 15:29:27

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5 Constitution Way, Unit A Woburn, MA 01801
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http://www.EMSL.com / bostonlab@emsl.com

EMSL Order: 132401076
Customer ID: EAFI66
Customer PO:
Project ID:

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**
06E *132401076-0016*	Hallway Side A Outside Main Offices - Plaster Skim Coat Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06F *132401076-0017*	Hallway Side A Outside Right Wing - Plaster Skim Coat Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06G *132401076-0018*	Hallway Side D Outside Boiler Room - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07A *132401076-0019*	Kitchen Rear Right Storage Room - Plaster Base Coat Ceiling	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07B *132401076-0020*	Room 407 - Plaster Base Coat Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07C *132401076-0021*	Center Hallway Side A - Plaster Base Coat Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07D *132401076-0022*	Room 104 - Plaster Base Coat Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07E *132401076-0023*	Hallway Side A Outside Main Offices - Plaster Base Coat Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07F *132401076-0024*	Hallway Side A Right Wing - Plaster Base Coat Wall	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07G *132401076-0025*	Hallway D Outside Boiler Room - Plaster Base Coat	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
08A *132401076-0026*	Room next to Literature Room - Gypsum Board	Brown/Gray Fibrous Homogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
08B *132401076-0027*	Library - Gypsum Board	Brown/Gray Fibrous Homogeneous	15% Cellulose 2% Glass	83% Non-fibrous (Other)	None Detected
09A *132401076-0028*	Library Center - Joint Compound - Wall	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09B *132401076-0029*	Room next to Literature Room - Joint Compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09C *132401076-0030*	Room next to Literature Room - Joint Compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09D *132401076-0031*	Literature Room - Joint Compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09E *132401076-0032*	Library Center - Joint Compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10A *132401076-0033*	Hallway Side D/C Intersection - 2x4 CT Crows Feet	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 15:29:27

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EMSL Order: 132401076
Customer ID: EAFI66
Customer PO:
Project ID:

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**
10B *132401076-0034*	Room 407 - 2x4 CT Crows Feet	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
11A *132401076-0035*	Library - 12x12 Gray Floor Tile w. White Spec	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
11B *132401076-0036*	Library - 12x12 Gray Floor Tile w. White Spec	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
12A *132401076-0037*	Library - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
12B *132401076-0038*	Library - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13A *132401076-0039*	Library - Brown Floor Leveler under Tile on Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13B *132401076-0040*	Library - Brown Floor Leveler under Tile on Concrete	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14A *132401076-0041*	Library - Cove Base	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14B *132401076-0042*	K1 - Cove Base	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15A *132401076-0043*	Library - Tan Cove Base Adhesive	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15B *132401076-0044*	K1 - Tan Cove Base Adhesive	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
16A *132401076-0045*	Library - 2x2 CT Pinhole	Gray/White Fibrous Homogeneous	45% Cellulose 40% Min. Wool	15% Non-fibrous (Other)	None Detected
16B *132401076-0046*	Center Hallway Side A - 2x2 CT Pinhole	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
17A *132401076-0047*	Literature Room - 2x2 CT Crows Feet	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
17B *132401076-0048*	Room 104 - 2x2 CT Crows Feet	Gray/White Fibrous Homogeneous	50% Cellulose 35% Min. Wool	15% Non-fibrous (Other)	None Detected
18A *132401076-0049*	Library - Brown Felt/Roofing above Gypsum Ceiling/Drop Ceiling	Brown Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
18B *132401076-0050*	Library - Brown Felt/Roofing above Gypsum Ceiling/Drop Ceiling	Brown Fibrous Homogeneous	98% Cellulose	2% Non-fibrous (Other)	None Detected
19A *132401076-0051*	Literature Room - 12x12 Light Blue Tile w. White/Blue Streak	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

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			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
19B *132401076-0052*	Literature Room - 12x12 Light Blue Tile w. White/Blue Streak	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
20A *132401076-0053*	Literature Room - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
20B *132401076-0054*	Literature Room - Assoc. Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
21A *132401076-0055*	Storage Off Room Off Literature Room - White Floor Leveler	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
21B *132401076-0056*	Storage Off Room Off Literature Room - White Floor Leveler	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
22A *132401076-0057*	Hallway Side C - Cork Board on Wall	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
22B *132401076-0058*	Hallway Side C - Cork Board on Wall	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
23A *132401076-0059*	Hallway Side C - Assoc. Black Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
23B *132401076-0060*	Hallway Side C - Assoc. Black Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
24A *132401076-0061*	Room 019 - 6x6 Brown Ceramic Floor Tile Grout	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
24B *132401076-0062*	Room 019 - 6x6 Brown Ceramic Floor Tile Grout	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
26A *132401076-0063*	Room 405 - Assoc. Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
26B *132401076-0064*	Room 402 - Assoc. Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27A *132401076-0065*	Staff Bath - White Floor Ceramic Squares Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
27B *132401076-0066*	Staff Bath - White Floor Ceramic Squares Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
28A *132401076-0067*	Room 403 - 12x12 Black Floor Tile under Red Floor Tile	Brown Non-Fibrous Homogeneous		95% Non-fibrous (Other)	5% Chrysotile
28B *132401076-0068*	Room 403 - 12x12 Black Floor Tile under Red Floor Tile				Positive Stop (Not Analyzed)
29A *132401076-0069*	Room 403 - Assoc. Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
29B *132401076-0070*	Room 403 - Assoc. Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 15:29:27

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5 Constitution Way, Unit A Woburn, MA 01801
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EMSL Order: 132401076
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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**
30A *132401076-0071*	Room 306 - 12x12 White Floor Tile w. Color	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
30B *132401076-0072*	Room 306 - 12x12 White Floor Tile w. Color	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
31A *132401076-0073*	Room 302 - 12x12 White Floor Tile w. Tan Spec	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
31B *132401076-0074*	Room 302 - 12x12 White Floor Tile w. Tan Spec	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32A *132401076-0075*	Pre K-3 - Cove Base Brittle	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
32B *132401076-0076*	Hallway Side A - Cove Base Brittle	Black/Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
33A *132401076-0077*	Pre K-3 - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
33B *132401076-0078*	Hallway Side A - Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
34A *132401076-0079*	Room CK-4 CS1-2 - 1x1 Pinhole CT Squares	Brown/Tan Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
34B *132401076-0080*	K1 - 1x1 Pinhole CT Squares	Brown/Tan Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
35A *132401076-0081*	Hallway Side B Outside 306 - Felt Backing above Wood Ceilings	Black Fibrous Homogeneous	95% Glass	5% Non-fibrous (Other)	None Detected
35B *132401076-0082*	Hallway Side B Outside 305 - Felt Backing above Wood Ceilings	Black Fibrous Homogeneous	95% Glass	5% Non-fibrous (Other)	None Detected
36A *132401076-0083*	Room 101 - 12x12 Light Blue Floor Tile w. Spec	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
36B *132401076-0084*	K2 - 12x12 Light Blue Floor Tile w. Spec	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
37A *132401076-0085*	Main Offices - 12x12 White Floor Tile w. Streak	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
37B *132401076-0086*	Main Offices - 12x12 White Floor Tile w. Streak	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
38A *132401076-0087*	RN Office - Blue Epoxy Sheet Flooring	White/Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
38B *132401076-0088*	RN Office - Blue Epoxy Sheet Flooring	White/Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 15:29:27

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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**
39A *132401076-0089*	Exterior Door #1 - Gray Door Caulking	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
39B *132401076-0090*	Exterior Door #1 - Gray Door Caulking	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40A *132401076-0091*	Exterior Door #2 - Brown Door Caulking	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
40B *132401076-0092*	Exterior Door #2 - Brown Door Caulking	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
41A *132401076-0093*	Room 205 - 12x12 Tan Floor Tile	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
41B *132401076-0094*	Room 205 - 12x12 Tan Floor Tile	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
42A *132401076-0095*	Room 205 - Assoc. Residual Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
42B *132401076-0096*	Room 205 - Assoc. Residual Black Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
43A *132401076-0097*	Exterior W - Brown Caulk on Exterior Windows	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
43B *132401076-0098*	Exterior N - Brown Caulk on Exterior Windows	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)
John McCarthy (97)

Steve Grise, Laboratory Manager
or Other Approved Signatory

Initial report from: 02/28/2024 15:29:27

OrderID: 132401076

efi global

132401076

BOSTON NORTH
155 West Street | Suite 6 | Wilmington, MA 01887 | PHONE 978.688.3736 | FAX 978.688.5494 | FREE 800.659.1202

BULK SAMPLE CHAIN OF CUSTODY FORM

Report to (Inspector Name):	Derrick Calvario	**Bill To:**	Accounts Payable
Company:	EFI Global, Inc.	**Address:**	Same
Address:	155 West Street	**City, State, Zip:**	Same
	Suite 6	**Telephone:**	800-659-1202
City, State, Zip:	Wilmington, MA 01887	**Email:**	US-EFIGlobal-BostonEnviroPC@efiglobal.com
Inspector Cell:	781-825-5012		
Project Information			
Project No./ Description:	014.07795 - ~~40 June St, Lowell, MA~~ (Riley School)		
Email Report to:	Derrick.Calvario@efiglobal.com ↳ 115 Douglas Rd. Lowell, MA		
Alternate:			
Requested Turnaround Time:			
☐ RUSH (6hr)	☐ 1 day (24hr)	☐ 2 day (48hr)	☒ 3 day (72hr)	☐ 5 day
Media and Methodology			
Type of Analysis:	PLM	**Check for Positive Stop:**	☒
Notes:	Analyze all plaster and joint compound samples	**Date Collected:**	2/20/24

Sample ID	Type of Material	Location
01A	Ceiling texture on plaster	Main lobby / enterance
01B	" "	" "
01C	" "	" "
02A	Yellow Carpet Mastic	office off Main lobby
02B	" "	Storage off room next to Literature room
03A	12x12 Brown floor tile under Carpet	office off main lobby
03B	" "	" "
04A	associated Yellow mastic	" "
04B	" "	" "

Total Number of Samples Submitted: 103

Samplers Name: Derrick Calvario Samplers Signature

Relinquished By (Client): RECD EMSL-BOSTON FEB 23 2024 Date: 2/23/24 Time: 1150

Received By (Lab): walk in Date: Time:

efi global

132401076

Sample ID	Type of Material	Location
05A	2X4 CT pinhole	Hallway Side D
05B	" "	Music room
06A	Plaster Skim Coat Ceiling	Kitchen rear right Storage room
06B	" " wall	Rm 407
06C	" " wall	Center Hallway Side A
06D	" " wall	Rm 104
06E	" " wall	Hallway Side A outside main offices
06F	" " wall	" " right wing
06G	" "	Hallway side D outside boiler rm
07A	Plaster Base Coat Ceiling	Kitchen rear right storage room
07B	" " wall	Rm 407
07C	" " wall	Center Hallway Side A
07D	" " wall	Rm 104
07E	" " wall	Hallway Side A outside main offices
07F	" " wall	" " right wing
07G	" "	Hallway Side D outside boiler rm
08A	Gypsum board	room next to Literature room
08B	" "	Library
09A	Joint Compound - wall	Library Center
09B	" "	room next to literature room
09C	" "	~~Boston~~ "
09D	" "	Literature room
09E	" "	Library Center
~~09F~~	~~" "~~	
09G	" "	
10A	2X4 CT Craws feet	Hallway side D/C intersection
10B	" "	Rm 407
11A	12x12 gray fitile w/ white spec	Library
11B	" "	" "
12A	associated Yellow mastic	" "

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Sample ID	Type of Material	Location
12B	associated Yellow mastic	Library
13A	brown floor leveler under tile on Concrete	" "
13B	" "	" "
14A	Cove base	Library
14B	" "	K1
15A	Tan Cove base adhesive	Library
15B	" "	K1
16A	2x2 CT pin hole	Library
16B	" "	Center Hallway ~~Side~~ See A
17A	2x2 CT Crows feet	Literature room
17B	" "	~~Center Hallway Side A~~ Rm 104
18A	brown felt/roofing above gypsum ceiling/drop ceiling	Library
18B	" "	" "
19A	12x12 light blue tile w/white/blue streak	Literature room
19B	" "	" "
20A	associated Yellow mastic	" "
20B	" "	" "
21A	white floor leveler	Storage off room off literature room
21B	" "	" "
22A	Cork board on wall	Hallway Side C
22B	" "	" "
23A	associated black mastic	" "
23B	" "	" "
24A	6x6 brown Ceramic floor tile grout	Rm 019
24B	" "	" "
~~25A~~	~~12x12 red floor tile~~ VOID	~~Rm 405~~
~~25B~~	" " VOID	~~Rm 402~~
26A	associated black mastic	Rm 405
26B	" "	Rm 402

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Sample ID	Type of Material	Location
27A	White floor Ceramic squares grout	Staff bath
27B	" "	" "
28A	12x12 black floor tile under resilient	Rm 403
28B	" "	" "
29A	associated black mastic	" "
29B	" "	" "
30A	12x12 white fl tile w/ Color	Rm 306
30B	" "	" "
31A	12x12 White fl tile w/ tan spec	Rm 302
31B	" "	" "
32A	Cove base brown	Prek-3
32B	" "	Hallway Side A
33A	black mastic	Prek-3
33B	" "	Hallway Side A
34A	1x1 Pinhole CT Squares	Rm CK-4 CSA-2
34B	1x1 pinhole CT Squares	K1
35A	felt backing above wood Ceilings	Hallway Side B outside 306
35B	" "	" " outside 305
36A	12x12 light blue fl tile w/ spec	Rm 101
36B	" "	K2
37A	12x12 white fl tile w/ streak	Main offices
37B	" "	" "
38A	blue epoxy sheet flooring	RN office
38B	" "	RN office
39A	gray door Caulking	exterior door #1
39B	" "	" "
40A	Brown door Caulking	exterior door #2
40B	" "	" "
41A	12x12 Tan fl tile	Rm 205
41B	" "	" "

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Sample ID	Type of Material	Location
42A	associated residual black mastic	Rm 205
42B	" "	" "
43A	brown Caulk on exterior windows	Exterior W
43B	" "	Exterior W

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ATTACHMENT D

LICENSES AND TRAINING CERTIFICATES OF ASBESTOS INSPECTOR & MANAGEMENT PLANNER

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

Michael Flanagan
Director

ASBESTOS INSPECTOR

DERRICK W. CALVARIO
Eff.Date: 11/03/2023
Exp.Date: 11/02/2024
AI900703

Member C.O.N.E.S.
WB - NEW

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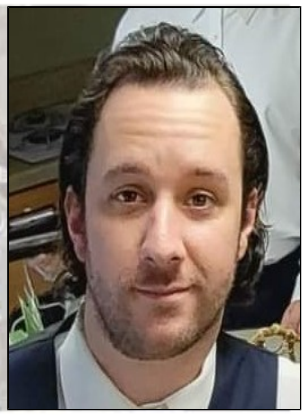

This is to certify that

Derrick W. Calvario

39 Valleywood Road, Hopkinton, MA 01748
MA DLS Asbestos Inspector License# AI900703

has completed requisite training by Video Conference, and has passed an examination for reaccreditation as:

Asbestos Inspector Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

Course Location
Zoom Video Conference
Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

August 3, 2023
Course Dates

August 03, 2023
Examination Date

23-4811-106-265405
Certificate Number

August 03, 2024
Expiration Date

Training Director

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF LABOR AND WORKFORCE DEVELOPMENT
DEPARTMENT OF LABOR STANDARDS

Michael Flanagan
Director

ASBESTOS MANAGEMENT PLANNER

MICHAEL MCCARTER

Eff.Date: 09/08/2023
Exp.Date: 09/07/2024
AP035661

Member C.O.N.E.S.

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This is to certify that

Michael L McCarter

7 Millstone Road, Windham, NH 03087

MA DLS Asbestos Management Planner License# AP035661

has completed the requisite training by Video Conference, and has passed an examination for reaccreditation

Asbestos Management Planner Refresher

pursuant to Title II of the Toxic Substance Control Act, 15 U.S.C. 2646

Course Location

Zoom Video Conference

Institute for Environmental Education 16 Upton Drive Wilmington, MA 01887

April 21, 2023
Course Dates

23-4930-136-219102
Certificate Number

April 21, 2023
Examination Date

April 21, 2024
Expiration Date

Training Director

16 Upton Drive, Wilmington, MA 01887 Telephone 978.658.5272 www.ieetrains.com

INSTITUTE FOR ENVIRONMENTAL EDUCATION