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
LeBlanc Therapeutic School
58 Sycamore 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 LeBlanc Therapeutic School located at 58 Sycamore Street, Lowell, Massachusetts (Site). The reinspection site visit was conducted on February 22, 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 033118

AHERA 3-YEAR REINSPECTION

FOR:

LEBLANC THERAPEUTIC SCHOOL
58 SYCAMORE 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 LeBlanc Therapeutic 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 re-inspection was conducted on February 22, 2024, by Derrick Calvario an EPA accredited, and Massachusetts Department of Labor Standards (MADLS) licensed Asbestos Inspector, (license number AI-001825). 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-035661).

A summary of known and assumed ACM within the LeBlanc Therapeutic 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. 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 LeBlanc Therapeutic School 58 Sycamore 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	Yes	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 LeBlanc Therapeutic 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 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. AHERA regulations state 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 abatement 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.

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 LeBlanc Therapeutic 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 was performed USEPA-accredited and MADLS licensed Asbestos Inspector Derrick Calvario. A total of 52 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 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
Terrazzo Flooring	Room 210, B02
Red Firestop	Room 205, Room 109
1’ X 1’ White W/ Spec Floor Tile	3rd Floor Hallways
Yellow Mastic Associated with 1’ X 1’ White W/ Spec Floor Tile	2nd Floor Hallways, 3rd Floor Hallways
1’ X 1’ White Floor Tile	Room 104, Room 107
Yellow Mastic associated with 1’ X 1’ White Floor Tile	Room 104, Room 107
Gray Floor Leveler	Room 104, Room 107
Black Paper Under Floor Tile	Room 104, Room 107
Black Fibrous Layer Under Floor Tile	Room 104, Room 107
9” x 9” Brown Floor Tile	Room 109
Yellow Mastic Assoc. W/ 9” X 9” Brown Floor Tile	Room 109
Cove Base	Room 109, 1st Floor Hallways
Yellow Mastic Associated with Cove Base	Room 109, 1st Floor Hallways

Material Description	Location(s) Sampled
Ceramic Tile Grout	Room 113 Bathroom
2' X 4' Large Fissure CT	3rd Floor Hallways, 1st Floor Hallways
2' X 4' Pinhole CT	2nd Floor Hallways
2' X 4' Crows Feet CT	2nd Floor Hallways
Exterior Door Caulk	Main Entrance

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 assessment must be maintained in place in accordance with the Operations and Maintenance Plan. Estimated costs associated with managing ACMs at the school are summarized below.

Cost Estimate of AHERA Considerations LeBlanc Therapeutic School 58 Sycamore 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 as recommended in the Summary Table of Identified and Assumed ACMs.	$500
AHERA workplan (for all non-Small Scale/Short Duration Work)	$500/plan
Asbestos Monitoring Costs (dependent on duration of project)	$1,000/shift

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 LeBlanc Therapeutic School 58 Sycamore Street, Lowell, Massachusetts	
Event	**Completion Date**
Immediately and annually notify occupants regarding ACM materials as recommended in the Summary Table if Identified and Assumed ACMs.	March 22, 2024, and annually thereafter
6 Month Surveillance Inspection	August 20, 2024
Annual Parental Notification Letter	September 1, 2024
6 Month Surveillance Inspection	February 20, 2025
Annual Parental Notification Letter	September 1, 2025
6 Month Surveillance Inspection	August 20, 2025
6 Month Surveillance Inspection	February 20, 2026
Annual Parental Notification Letter	September 1, 2026
6 Month Surveillance Inspection	August 20, 2026
3 Year Reinspection	February 20, 2027

ATTACHMENT A

AHERA SUMMARY TABLE

AHERA 3 Year Re-Inspection Summary Table
Leblanc Therapeutic Day School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
58 Sycamore Street, Lowell, MA
Dates of Inspection: 2/22/2024

Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
1' X 1' Tan Floor Tile	Basement – Hallway/Gym/Stage Area	2,812 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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 floor tile.	
1' X 1' Tan Floor Tile	Exit to Hall	184 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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 covering floor tile with heavy carpets in door vestibule areas to minimize potential for damage.	
Gypsum Board	Basement Hall (location added per 2024 reinspection)	3,160 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound on Gypsum Board Walls (material added per 2024 reinspection)	Basement Hall	3,160 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls 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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
"Transite" (Asbestos Cement Board)	Basement Hallway behind water fountain	5 SF	NF	20% chrysotile asbestos	5	Good	Manage in place in accordance with the Asbestos O&M Program.	
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B02	300 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

AHERA 3 Year Re-Inspection Summary Table
Leblanc Therapeutic Day School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
58 Sycamore Street, Lowell, MA
Dates of Inspection: 2/22/2024

Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Gypsum Board Walls	Room B03 (Location added per 2024 reinspection)	500 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B03	500 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	Good	Immediately and annually thereafter notify occupants of the ACM joint compound associated with gypsum board walls 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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B03	200 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room B04 (location added per 2024 reinspection)?	500 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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 March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B04	500 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B04	200 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

AHERA 3 Year Re-Inspection Summary Table
Leblanc Therapeutic Day School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
58 Sycamore Street, Lowell, MA
Dates of Inspection: 2/22/2024

Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Gypsum Board Walls	Room B05 (location added per 2024 reinspection)	750 SF	NF	Positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B05	750 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B05	250 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room B06 (location added per 2024 reinspection)	1,200 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B06	1,200 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B06	200 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

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Leblanc Therapeutic Day School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
58 Sycamore Street, Lowell, MA
Dates of Inspection: 2/22/2024

Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
1' X 1' Tan Floor Tile	Room B06	400 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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.	
Gypsum Board Walls	Room B08 (location added per 2024 reinspection)	1,000 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound Walls (material added per 2024 reinspection)	Room B08	1,000 SF	NF	Not sampled assumed, gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room B08	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
1' X 1' Tan Floor Tile	Room B08	400 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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.	
Gypsum Board Walls	Room B09 (location added per 2024 reinspection)	1,500 SF	NF	Positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter

AHERA 3 Year Re-Inspection Summary Table
Leblanc Therapeutic Day School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
58 Sycamore Street, Lowell, MA
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Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B09	1,500 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B09	150 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room B11 (location added per 2024 reinspection)	1,500 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room B11	1,500 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B11	200 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B14	300 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

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Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	Room B16/ Boiler Room Area	200 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	1st Floor Hallways	1,000 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
1' X 1' Beige Floor Tile	1st Floor Hallway	1,650 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	5	Good condition overall with minor cracking. Tile is intact.,.~10 square feet cracks and missing pieces at threshold	Damaged floor tile is sealed with wax, manage in place in accordance with the Asbestos O&M Program or replace with 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	
Gypsum Board Walls	Room 104 (location added per 2024 reinspection)	600 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with gypsum board Walls (material added per 2024 reinspection)	Room 104	600 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 104	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

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Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
1' X 1' Tan Floor Tile	Room 104	325 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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.	
Pipe Elbow Insulation	Room 104	2 Elbows	NF	Positive per management plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program. Avoid storing desks, shelving units, or equipment in close proximity to the pipe fitting insulation. Routine inspections of ACM for physical damages due to occupancy or other factors can be performed more frequently, such as every three months.	
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Bathroom off Room 104	300 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room 107 (location added per 2024 reinspection)	600 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room 107	600 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 107	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

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Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Gypsum Board Walls	Room 108 (location added per 2024 reinspection)	200 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room 108	200 SF	NF	Not sampled Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 108	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 109	1,400 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Bathroom off Room 109	350 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 110	1,400 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 111	1,100 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter

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Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 112	1,100 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Walls (material added per 2024 reinspection)	Room 113	850 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Walls (material added per 2024 reinspection)	Bathroom off Room 113	300 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Main Entrance	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings (material added per 2024 reinspection)	2nd Floor Hallways	1,000 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
1' X 1' Beige Floor Tile	2nd Floor Hallway	1,640 SF	NF	Positive per management plan records (underlying mastic is non-ACM per sample results in 2024)	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.	
Gypsum Board	Girl's Room 2nd Floor (204) (location added per 2024 reinspection)	720 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter

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Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Girl's Room 2nd Floor (204)	720 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Girl's Room 2nd Floor (204)	1,000 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 205	1,400 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 206	1,400 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 207	600 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room 208 (location added per 2024 reinspection)	1,440 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter

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Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room 208	300 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 208	1,100 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Room 209 (location added per 2024 reinspection)	1,440 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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 March 22, 2024, and annually thereafter
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Room 209	300 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Room 209	1,100 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
Gypsum Board Walls	Boy's Room 2nd Floor (210) (location added per 2024 reinspection)	720 SF	NF	Not Sampled, appears homogeneous to other areas of confirmed ACM. Assumed ACM.	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter

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Dates of Inspection: 2/22/2024

Material Description	Location	Quantity	Friability (F/NF)	Sample Results	Assessment Category	Condition	Response Actions/Notes	Recommended Completion Date
Joint Compound associated with Gypsum Board Walls (material added per 2024 reinspection)	Boy's Room 2nd Floor (210)	720 SF	NF	Not sampled. Assumed ACM. Note that gypsum board is positive per management plan records	6	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. Collect bulk samples to determine asbestos content prior to any disturbance.	Notify by March 22, 2024, and annually thereafter
Plaster Skim Coat Ceilings and Walls (material added per 2024 reinspection)	Boy's Room 2nd Floor (210)	1,400 SF	NF	2% chrysotile asbestos (note that plaster base coat is non-ACM)	6	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 March 22, 2024, and annually thereafter
"Transite" (Asbestos Cement Board)	Outside Building Above Door on Overhang	10 SF	NF	Positive per management plan records	6	Good	Manage in place in accordance with the Asbestos O&M Program.	

SF = Square Feet

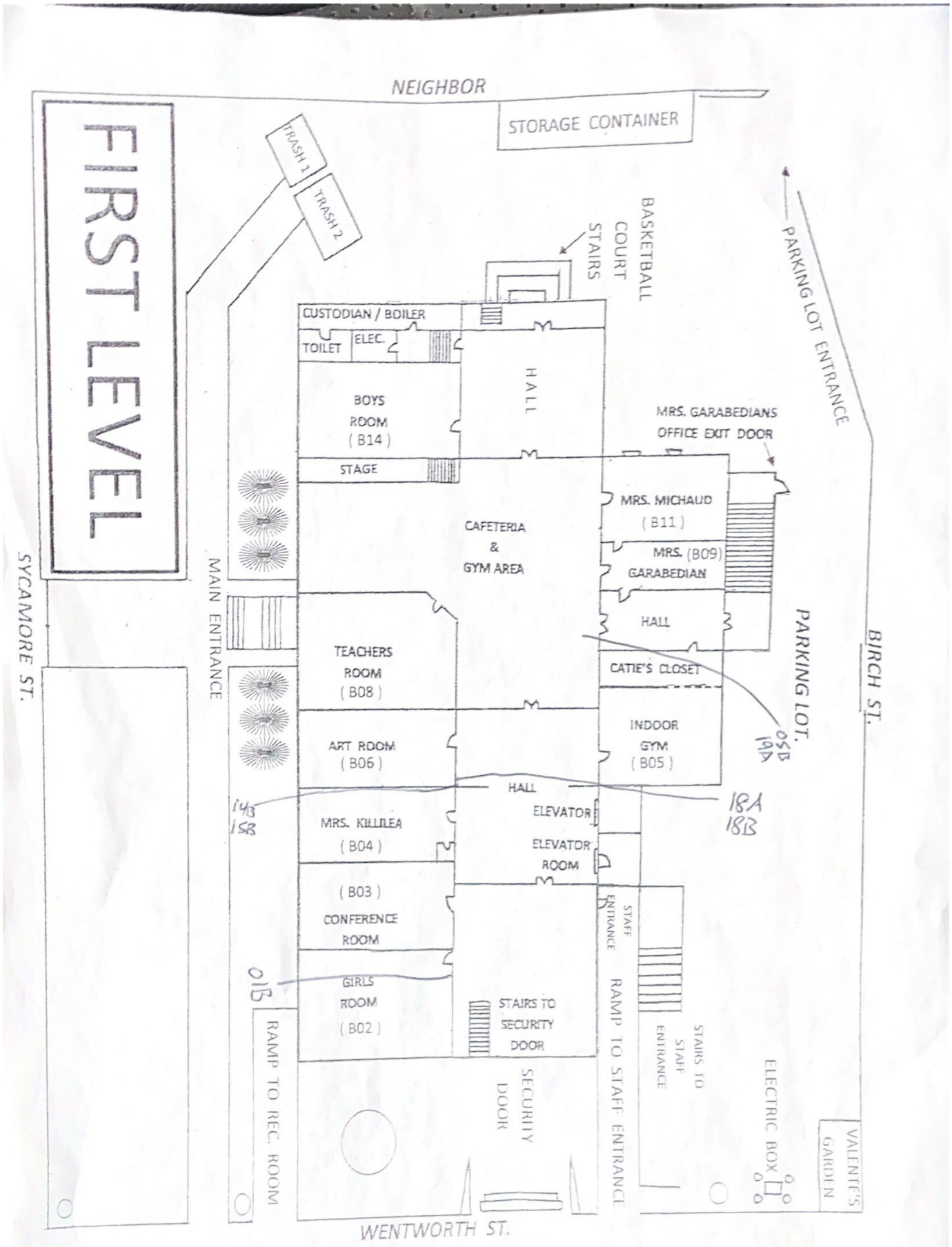
Assumed ACM = This material was not identified in the Management Plan records and was not sampled during the 2024 Re-inspection. Prior to any planned disturbance by maintenance, renovation, or demolition activities, EFI recommends bulk sampling and analysis to determine asbestos content.

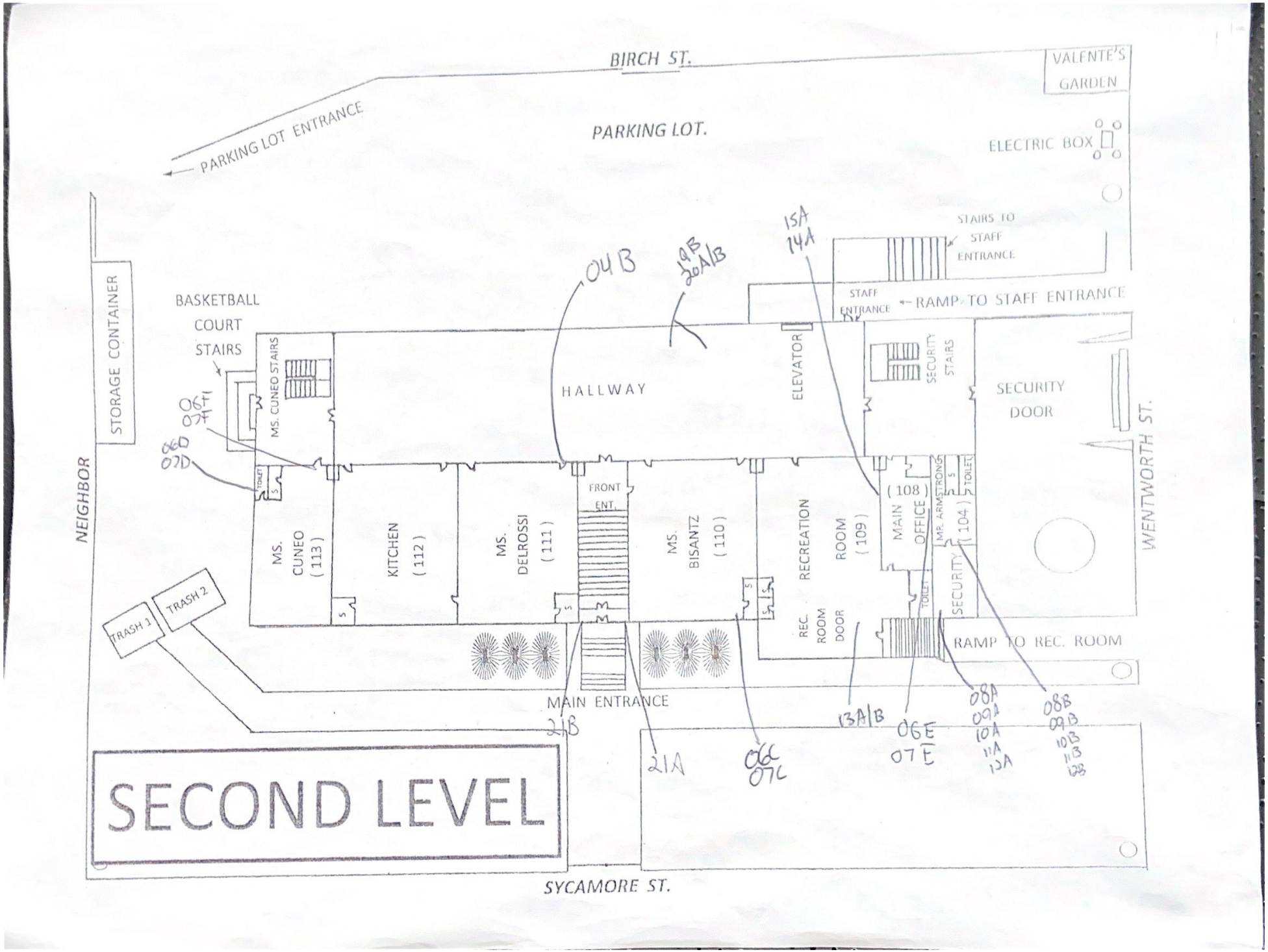
For all recommended response actions, the work should be conducted by a Massachusetts licensed Asbestos Contractor and a work plan for the specific repair or removal activity should be prepared by a Massachusetts licensed Asbestos Designer.

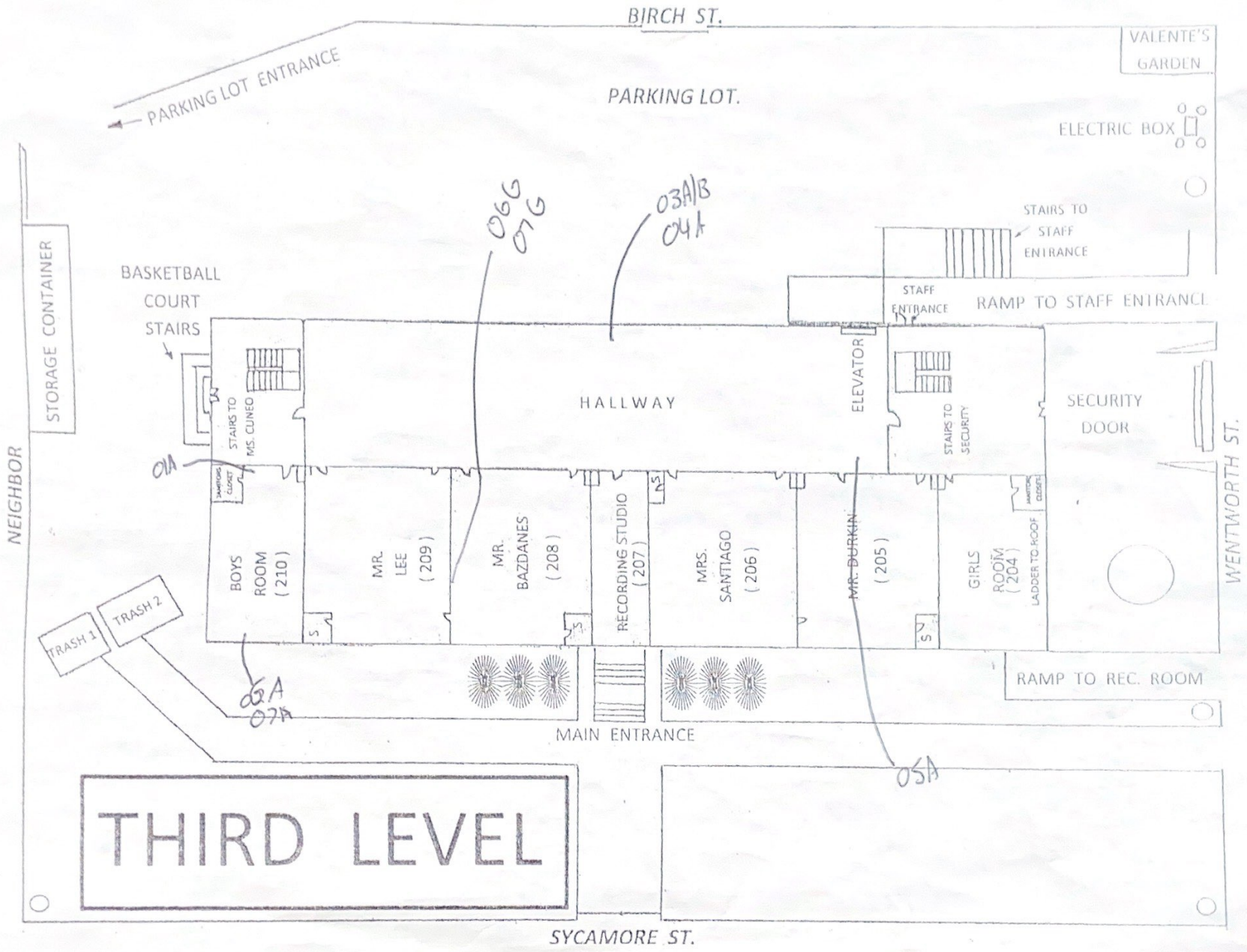
Physical Assessment Category
1 – Damaged or Significantly Damaged Thermal System ACM
2 – Damaged Friable Surfacing ACM
3 – Significantly Damaged Surfacing ACM
4 – Damaged or Significantly Damaged Friable Miscellaneous ACM
5 – ACM with Potential for Damage
6 – ACM with Potential for Significant Damage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

ATTACHMENT B

SITE PLANS AND 2024 REINSPECTION ASBESTOS BULK SAMPLE LOCATIONS


FIRST LEVEL
NEIGHBOR
STORAGE CONTAINER
TRASH 2
TRASH 2
BASKETBALL COURT
STAIRS
PARKING LOT ENTRANCE
CUSTODIAN / BOILER
TOILET
ELEC.
HALL
BOYS ROOM (B14)
MRS. GARABEDIANS OFFICE EXIT DOOR
STAGE
MRS. MICHAUD (B11)
CAFETERIA & GYM AREA
MRS. (B09) GARABEDIAN
HALL
MAIN ENTRANCE
TEACHERS ROOM (B08)
CATIE'S CLOSET
PARKING LOT.
BIRCH ST.
INDOOR GYM (B05)
ART ROOM (B06)
HALL
ELEVATOR
MRS. KILLILEA (B04)
ELEVATOR ROOM
(B03)
CONFERENCE ROOM
STAFF ENTRANCE
GIRLS ROOM (B02)
STAIRS TO SECURITY DOOR
RAMP TO STAFF ENTRANCE
STAIRS TO STAFF ENTRANCE
ELECTRIC BOX
VALENTE'S GARDEN
SECURITY DOOR
RAMP TO REC. ROOM
SYCAMORE ST.
WENTWORTH ST.


BIRCH ST.
VALENTE'S GARDEN
PARKING LOT ENTRANCE
PARKING LOT.
ELECTRIC BOX
STAIRS TO STAFF ENTRANCE
STAFF ENTRANCE
RAMP TO STAFF ENTRANCE
STORAGE CONTAINER
BASKETBALL COURT STAIRS
MS. CUNEO STAIRS
HALLWAY
ELEVATOR
SECURITY STAIRS
SECURITY DOOR
NEIGHBOR
WENTWORTH ST.
TOILET
S
MS. CUNEO (113)
KITCHEN (112)
MS. DELROSSI (111)
FRONT ENT.
MS. BISANTZ (110)
REC. ROOM DOOR
RECREATION ROOM (109)
(108) MAIN OFFICE
MR. ARMSTRONG
(104) SECURITY
RAMP TO REC. ROOM
TRASH 1
TRASH 2
MAIN ENTRANCE
SECOND LEVEL
SYCAMORE ST.
04B
09B 10A/B
15A 14A
06F 07F
06D 07D
21B
21A
06C 07C
13A/B
06E 07E
08A 09A 10A 11A 12A
08B 09B 10B 11B 12B


BIRCH ST.
PARKING LOT ENTRANCE
PARKING LOT.
VALENTE'S GARDEN
ELECTRIC BOX
STAIRS TO STAFF ENTRANCE
STAFF ENTRANCE
RAMP TO STAFF ENTRANCE
BASKETBALL COURT STAIRS
STORAGE CONTAINER
NEIGHBOR
STAIRS TO MS. CUNEO
HALLWAY
ELEVATOR
STAIRS TO SECURITY
SECURITY DOOR
WENTWORTH ST.
BOYS ROOM (210)
MR. LEE (209)
MR. BAZDANES (208)
RECORDING STUDIO (207)
MRS. SANTIAGO (206)
MR. DURKIN (205)
GIRLS ROOM (204)
LADDER TO ROOF
TRASH 1
TRASH 2
RAMP TO REC. ROOM
MAIN ENTRANCE
SYCAMORE ST.
THIRD LEVEL

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:	132401075
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:**	
Project:	014.07795 - Leblanc School; 58 Sycamore Street; 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 *132401075-0001*	3rd Floor Room 210 - Terrazzo Flooring	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
01B *132401075-0002*	1st Floor Girls BR B02 - Terrazzo Flooring	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02A *132401075-0003*	Room 205 - Red Fire Stop	Red Fibrous Homogeneous	2% Glass	98% Non-fibrous (Other)	None Detected
02B *132401075-0004*	Room 109 - Red Fire Stop	Red Non-Fibrous Homogeneous	2% Glass	98% Non-fibrous (Other)	None Detected
03A *132401075-0005*	3rd Floor Hallway Center - 12x12 White Floor Tile	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
03B *132401075-0006*	3rd Floor Hallway Center - 12x12 White Floor Tile	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
04A *132401075-0007*	3rd Floor Hallway Center - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
04B *132401075-0008*	2nd Floor Hallway Center - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
05A *132401075-0009*	3rd Floor Hallway Center - 2x4 CT Large Fissure	Gray/White Fibrous Homogeneous	45% Cellulose 35% Min. Wool	20% Non-fibrous (Other)	None Detected
05B *132401075-0010*	1st Floor Hallway Center - 2x4 CT Large Fissure	Gray Fibrous Homogeneous	45% Cellulose 35% Min. Wool	20% Non-fibrous (Other)	None Detected
06A *132401075-0011*	3rd Floor Boys Room (210) - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06B *132401075-0012*	3rd Floor Girls Room (204) - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06C *132401075-0013*	2nd Floor Room (110) - Plaster Skim Coat	White Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
06D *132401075-0014*	2nd Floor Room 113 BR - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06E *132401075-0015*	Main Office Room 108 - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
06F *132401075-0016*	Room 113 - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 11:03:01

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: 132401075
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**
06G *132401075-0017*	Room 208 - Plaster Skim Coat	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07A *132401075-0018*	3rd Floor Boys Room (210) - Plaster Base Coat	White Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
07B *132401075-0019*	3rd Floor Girls Room (204) - Plaster Base Coat	Gray Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
07C *132401075-0020*	2nd Floor Room (110) - Plaster Base Coat	Gray Fibrous Homogeneous	<1% Cellulose	100% Non-fibrous (Other)	None Detected
07D *132401075-0021*	2nd Floor Room 113 BR - Plaster Base Coat	Gray Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
07E *132401075-0022*	Main Office Room 108 - Plaster Base Coat	Gray Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
07F *132401075-0023*	Room 113 - Plaster Base Coat	Gray Fibrous Homogeneous	2% Cellulose	98% Non-fibrous (Other)	None Detected
07G *132401075-0024*	Room 208 - Plaster Base Coat	Gray Fibrous Homogeneous	<1% Cellulose	100% Non-fibrous (Other)	None Detected
08A *132401075-0025*	Room 104/107 - 12x12 White Floor Tile w. Spec	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
08B *132401075-0026*	Room 104/107 - 12x12 White Floor Tile w. Spec	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09A *132401075-0027*	Room 104/107 - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09B *132401075-0028*	Room 104/107 - Yellow Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10A *132401075-0029*	Room 104/107 - Gray Floor Leveler	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10B *132401075-0030*	Room 104/107 - Gray Floor Leveler	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
11A *132401075-0031*	Room 104/107 - Black Paper under Tile	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
11B *132401075-0032*	Room 104/107 - Black Paper under Tile	Black Fibrous Homogeneous	80% Cellulose	20% Non-fibrous (Other)	None Detected
12A *132401075-0033*	Room 104/107 - Black Fibrous Layer under Tile	Brown Fibrous Homogeneous	7% Cellulose	93% Non-fibrous (Other)	None Detected
12B *132401075-0034*	Room 104/107 - Black Fibrous Layer under Tile	Brown Fibrous Homogeneous	7% Cellulose	93% Non-fibrous (Other)	None Detected
13A-Brown Floor Tile *132401075-0035*	2nd Floor Room 109 - Yellow 9x9 Brown Tile Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 11:03:01

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: 132401075
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**
13A-Yellow Mastic *132401075-0035A*	2nd Floor Room 109 - Yellow 9x9 Brown Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13B-Brown Floor Tile *132401075-0036*	2nd Floor Room 109 - Yellow 9x9 Brown Tile Mastic	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13B-Yellow Mastic *132401075-0036A*	2nd Floor Room 109 - Yellow 9x9 Brown Tile Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14A *132401075-0037*	2nd Floor Room 109 - Cove Base	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14B *132401075-0038*	1st Floor Hallway Center - Cove Base	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15A *132401075-0039*	2nd Floor Room 109 - Mastic Yellow	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15B *132401075-0040*	1st Floor Hallway Center - Mastic Yellow	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
16A *132401075-0041*	2nd Floor Room 113 BR - Ceramic Tile Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
16B *132401075-0042*	2nd Floor Room 113 BR - Ceramic Tile Yellow Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
17A *132401075-0043*	2nd Floor Room 113 BR - Ceramic Tile Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
17B *132401075-0044*	2nd Floor Room 113 BR - Ceramic Tile Grout	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
18A *132401075-0045*	1st Floor Hallway behind Water Fountain - Cement Board	Gray Fibrous Homogeneous		80% Non-fibrous (Other)	20% Chrysotile
18B *132401075-0046*	1st Floor Hallway behind Water Fountain - Cement Board				Positive Stop (Not Analyzed)
19A *132401075-0047*	1st Floor Hallway - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	60% Cellulose 15% Min. Wool	25% Non-fibrous (Other)	None Detected
19B *132401075-0048*	2nd Floor Hallway Center - 2x4 CT Pinhole	Gray/White Fibrous Homogeneous	60% Cellulose 15% Min. Wool	25% Non-fibrous (Other)	None Detected
20A *132401075-0049*	2nd Floor Hallway Center - 2x4 CT Crows Feet	Gray/White Fibrous Homogeneous	60% Cellulose 15% Min. Wool	25% Non-fibrous (Other)	None Detected
20B *132401075-0050*	2nd Floor Hallway Center - 2x4 CT Crows Feet	Gray/White Fibrous Homogeneous	65% Cellulose 15% Min. Wool	20% Non-fibrous (Other)	None Detected
21A *132401075-0051*	Main Entrance - Exterior Door Caulk	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 02/28/2024 11:03:01

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: 132401075
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**
21B *132401075-0052*	Main Entrance - Exterior Door Caulk	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s)
Ramon Buenaventura (53)

Steve Grise, Laboratory Manager
or Other Approved Signatory

Initial report from: 02/28/2024 11:03:01

OrderID: 132401075

efi global 132401075

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 - Leblanc School - 58 Sycamore St. Lowell, MA
Email Report to:	Derrick.Calvario@efiglobal.com
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/ /24

Sample ID	Type of Material	Location
01A	Terrazzo flooring	~~2nd~~ 3rd fl rm 210
01B	" "	1st fl girls BR B02
02A	red fire stop	rm 205
02B	" "	rm 109
03A	12x12 white floor tile	3rd fl Hallway Center
03B	" "	" "
04A	Yellow tile mastic	3rd fl Hallway Center
04B	" "	2nd fl ~~Center~~ Hallway Center
05A	2x4 CT large fissure	3rd fl Hallway Center
05B	" "	1st fl Hallway Center

Total Number of Samples Submitted: 52

Samplers Name: Derrick Calvario Samplers Signature

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

REC'D EMSL-BOSTON FEB 23 2024

Received By (Lab): Date: Time:

efi global 132401075

Sample ID	Type of Material	Location
06 A	plaster skim Coat	3rd fl boys rm (210)
06 B	" "	3rd fl girls rm (204)
06 C	" "	2nd fl rm (110)
06 D	" "	2nd fl rm 113 br
06 E	" "	Main Office Rm 108
06 F	" "	Rm 113
06 G	" "	Rm 208
07 A	Plaster Base Coat	3rd fl Boys rm (210)
07 B	" "	3rd fl girls rm (204)
07 C	" "	2nd fl rm (110)
07 D	" "	2nd fl rm 113 br
07 E	" "	Main Office Rm 108
07 F	" "	Rm 113
07 G	" "	Rm 208
08A	12x12 White fl tile w/ speck	Rm 104/107
08B	" "	" "
09A	Yellow tile mastic	" "
09B	" "	" "
10A	gray floor leveler	" "
10B	" "	" "
11A	black paper under tile	" "
11B	" "	" "
12A	brown fibrous layer under tile	" "
12B	" "	" "
13A	Yellow 9x9 brown tile mastic	Rm 2nd fl log
13B	" "	" "
14A	Cove base	Rm 2nd fl 109
14B	" "	1st fl hallway Center
15A	Mastic Yellow	Rm 2nd fl 109
15B	" "	1st fl hallway Center

REC'D EMSL-BOSTON FEB 23 2024

efi global 132401075

Sample ID	Type of Material	Location
16A	Ceramic tile yellow mastic	2nd FL RM 113 bF
16B	" "	" "
17A	Ceramic tile grout	" "
17B	" "	" "
18A	Cement board	1st floor hallway behind water fountain
18B	" "	" "
19A	2X4ct Pinhole	1st fl Hallway
19B	" "	2nd fl hallway Center
20A	2X4ct Crows feet	2nd fl hallway Center
20B	" "	" "
21A	Ext. Door Caulk	Main Entrance
21B	" "	" "

RECD 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

TABLE OF CONTENTS

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.	

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
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.	

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
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.	

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
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.	

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
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.	

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
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.	

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
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.	

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
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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Peter W. Reilly Elementary School
Summary Table of Identified and Assumed Asbestos-Containing Building Materials
115 Douglas Road, 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
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.	

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
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

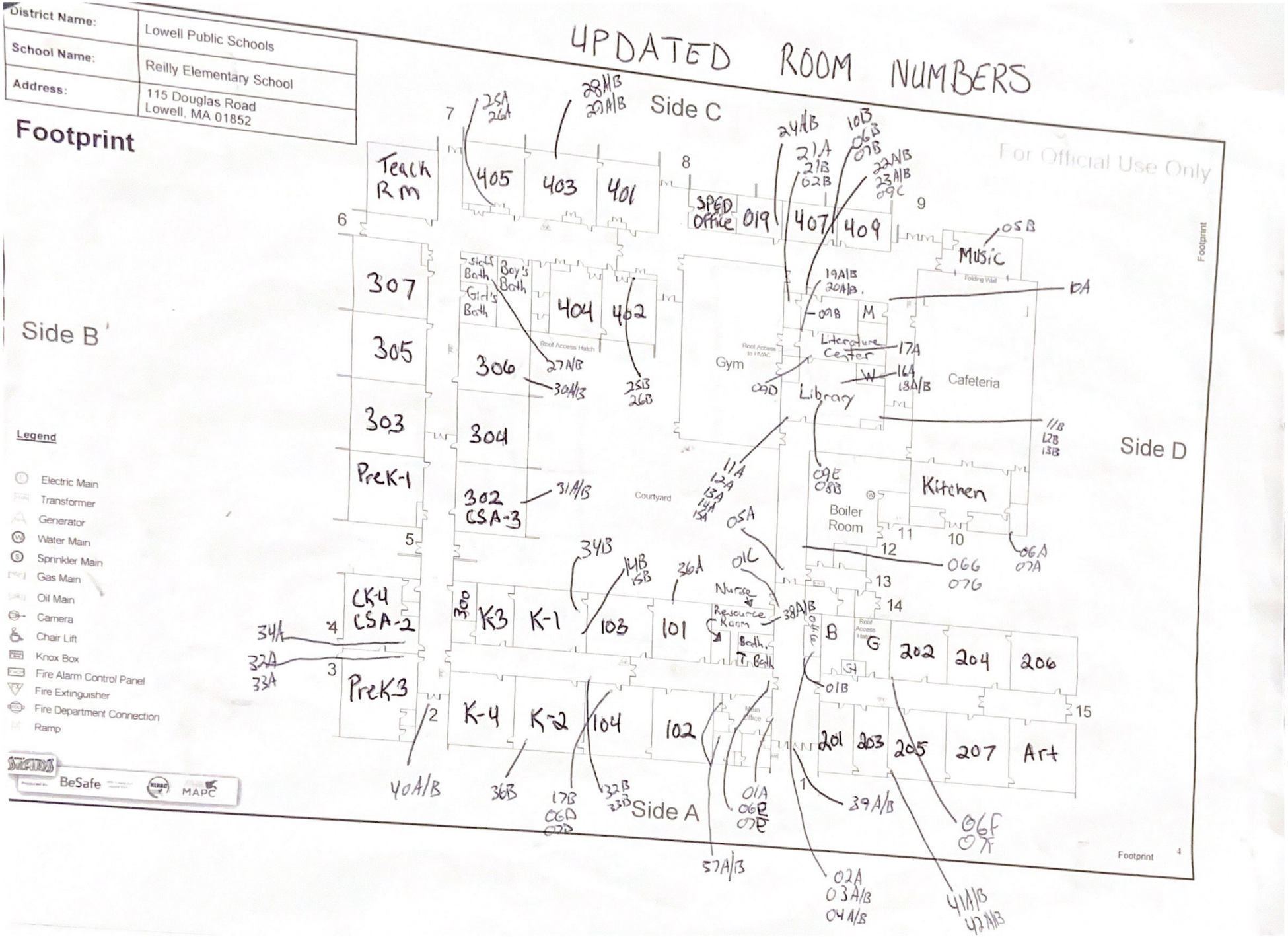
ATTACHMENT B

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

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:

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

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:

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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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**
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

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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

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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**
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

132401076

efi global

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/ lenterance
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 1150 FEB 23 2024 EMSL-BOSTON Date: 2/23/24 Time:

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	" "	~~Room~~ "
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	" "

REC'D EMSL-BOSTON FEB 23 2024

efi global 132401076

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~~ 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

REC'D EMSL-BOSTON FEB 23 2024

OrderID: 132401076

efi global 132401076

Sample ID	Type of Material	Location
27A	White Ceramic floor squares grout	Staff bath
27B	" "	" "
28A	12x12 black floor tile under red tile	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	" "	" "

RECD EMSL-BOSTON FEB 23 2024

efi global 132401076

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

REC'D EMSL-BOSTON FEB 23 2024

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

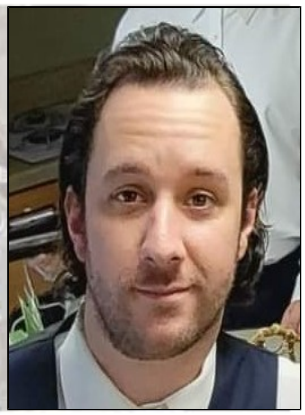
ASBESTOS INSPECTOR

DERRICK W. CALVARIO

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

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

24



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.

24

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