Three (3) Year EPA AHERA
Re-Inspection Report For The

Whiteriver Unified School District #20

Activity Center
Whiteriver, Arizona

April 20, 2017

PREPARED BY:

EMC2, LLC
9830 SOUTH 51ST STREET, SUITE B-109
PHOENIX, ARIZONA 85044
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GENERAL INVENTORY (763.93)

The site of: Activity Center, located in Whiteriver, Arizona is a single building facility. There is one (1) two story Permanent Structure located at this site that is included in this inspection report.

The following will give the building designation assigned by the Owner, the name of the building or general usage / function, and the approximate year that original construct occurred:

1. Activity Center Approx. 34,000 sf 1996

During the inspection process of each of the buildings, the following suspect materials were observed at this site:

Surfacing Material

01. None Observed

Miscellaneous Materials

01. 2x4 Ceiling Panels
02. Drywall Systems
03. Interior & Exterior Paint
04. Block & Mortar
05. Baseboard & Adhesive
06. Window Putty
07. 12x12 Floor Tile & Mastic
08. Ceramic Tile Systems
09. Door / Window Frame Caulking
10. HVAC Duct Seam Mastic
11. Sink Acoustical Coating
12. Stucco
13. Building Expansion Joint
14. Concrete Material
15. Spray-on Floor Texture

Thermal System Insulation

01. None Observed
INSPECTION REPORT (763.85)

At the request of the Whiteriver Unified School District #20, a comprehensive survey and inspection was completed at this facility on 04/20/2017 by the following accredited personnel:

Patricia Francis:  
Inspector:  
EPA#  25511-2392356-289373 (Exp. 08/14/17)

Benjamin Jones:  
Management Planner:  
EPA#  10052-2885918-414576 (Exp. 12/07/17)

INSPECTION (763.85) and BULK SAMPLE PROCEDURES (763.86)

A complete visual inspection was performed to acquaint the inspector with a total perspective of each building / area. Homogenous areas were mapped where building materials of the same type, style and composition were used in the same manner.

Representative samples, were taken in random / convenience fashion of the homogeneous areas, using variations of the attached random sample pattern. These samples were given individual numbers and recorded on collection sheets for future reference, (see Field Sample Sheets).

Bulk samples were submitted and analyzed by Polarized Light Microscopy (PLM) in a AIHA accredited laboratory to determine which, if any, contain asbestos. Sample results were cross referenced to the locations in which they were taken to determine which areas of this facility have Asbestos Containing Materials (ACM). For a list of materials found to contain asbestos, see Summary of Asbestos Containing Materials.

All of the ACM materials were determined to be either friable or non-friable by touch. A material is considered friable if when dry, it may be crumbled, pulverized, or reduced to powder by hand pressure. According to EPA standards (NESHAP - 40 CFR 61, Subpart M), these materials are considered Regulated Asbestos Containing Materials (RACM) and have a high probability of becoming airborne during renovation and / or demolition.

The EPA (NESHAP - 40 CFR 61, Subpart M) considers a material non-friable if, when dry, it cannot be crumbled, pulverized, or reduced to powder by hand pressure. These materials are considered Non Regulated Asbestos Containing Materials (non-RACM) because they historically will not become friable during renovation and / or demolition and have limited probability of releasing airborne fibers.
INSPECTION (763.85) and BULK SAMPLE PROCEDURES (763.86)
(Continued)

This inspection was conducted in a non-aggressive manner. No destructive means were used to gain access to inaccessible spaces such as duct chases, wall interiors, and areas above solid ceilings, etc. During any renovation / demolition activities, personnel should always be aware and alert for any ACM suspect material that may be hidden.

Following are the results of this inspection and the methods used to obtain them. This includes, if applicable, the materials sampled, bulk analysis of the materials, results of analysis, and the material assessment of the materials that are ACM. If applicable, response actions and handling procedures are included for the friable ACM materials that were found. All areas / buildings have a written description listing the locations where each bulk sample was collected. All ACM materials, assumed or tested, have a written description designating the location of the material, see Summary of ACBM and Inspection Reports.

**NESHAP Inspection Information:**

<table>
<thead>
<tr>
<th>Benjamin Jones</th>
<th>EPA Building Inspector:</th>
<th>EPA # F8316 (Exp. 10/04/2014)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of Inspection:</td>
<td>05/01/2014</td>
<td>Training Provider: Asbestos Institute</td>
</tr>
<tr>
<td>Laboratory:</td>
<td>EMC Labs, Inc.</td>
<td># of Samples: 49</td>
</tr>
<tr>
<td>Date of Analysis:</td>
<td>05/16/2014</td>
<td>Method: PLM - Polarized Light Microscopy</td>
</tr>
</tbody>
</table>
ABBREVIATION KEY

The following key will define the terms used in this report along with data needed to fully understand this report.

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Term</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACBM</td>
<td>Asbestos Containing Building Materials</td>
</tr>
<tr>
<td>ACM</td>
<td>Asbestos Containing Materials</td>
</tr>
<tr>
<td>HA</td>
<td>Homogeneous Area</td>
</tr>
<tr>
<td>FS</td>
<td>Functional Space</td>
</tr>
<tr>
<td>TSI</td>
<td>Thermal System Insulation</td>
</tr>
<tr>
<td>SM</td>
<td>Surfacing Material</td>
</tr>
<tr>
<td>MISC</td>
<td>Miscellaneous Material</td>
</tr>
<tr>
<td>NF</td>
<td>Non-Friable</td>
</tr>
<tr>
<td>F</td>
<td>Friable</td>
</tr>
<tr>
<td>A</td>
<td>Assumed</td>
</tr>
<tr>
<td>T</td>
<td>Tested</td>
</tr>
<tr>
<td>SF</td>
<td>Square Feet</td>
</tr>
<tr>
<td>LF</td>
<td>Linear Feet</td>
</tr>
<tr>
<td>POT</td>
<td>Potential for Damage</td>
</tr>
<tr>
<td>SIG</td>
<td>Significantly Damaged</td>
</tr>
<tr>
<td>POT SIG</td>
<td>Potential for Significant Damage</td>
</tr>
<tr>
<td>O &amp; M</td>
<td>Operation &amp; Maintenance Plan</td>
</tr>
<tr>
<td>EPA</td>
<td>Environmental Protection Agency</td>
</tr>
<tr>
<td>BLDG</td>
<td>Building</td>
</tr>
<tr>
<td>INSL</td>
<td>Insulation</td>
</tr>
<tr>
<td>FBGL</td>
<td>Fiberglass</td>
</tr>
<tr>
<td>BBA</td>
<td>Baseboard Adhesive</td>
</tr>
<tr>
<td>VAT</td>
<td>Vinyl Asbestos Tile</td>
</tr>
</tbody>
</table>

Explanation of terms and rankings used in this report:

AHERA CATEGORIES

#1    Damaged or Significantly Damaged TSI ACM  
#2    Damaged Friable Surfacing ACM            
#3    Significantly Damaged Friable Surfacing ACM  
#4    Damaged or Significantly Damaged Friable Miscellaneous ACM  
#5    ACBM with Potential for Damage           
#6    ACBM with Potential for Significant Damage  
#7    Any Remaining Friable ACBM or Friable Suspected ACBM

HAZARD RANKING

#1    ACBM in good condition with Low Potential for Damage  
#2    ACBM in good condition with Potential for Damage     
#3    ACBM in good condition with Potential for Significant Damage  
#4    ACBM in Damaged condition with Low Potential for Disturbance  
#5    ACBM in Damaged condition with Potential for further Damage  
#6    ACBM in Damaged condition w/Potential for Significant Damage  
#7    Significantly Damaged ACBM

The following three pages are flow charts showing the method of categorizing the materials and acceptable response actions.
CLASSIFICATION FOR HAZARD POTENTIAL
(DECISION TREE DISPLAY)

ACRM Conditions

Significant Damage
Hazard Rank #7

Potential Disturbance

Potential Significant Damage
Hazard Rank #1

Potential Significant Damage
Hazard Rank #3

Potential Damage
Hazard Rank #2

Potential Damage
Hazard Rank #4

Low

Good

Potential Disturbance

Potential Significant Damage
Hazard Rank #5

Potential Damage
Hazard Rank #6

Low
<table>
<thead>
<tr>
<th>HAZARD RANK</th>
<th>RELATIVE PRIORITY</th>
<th>AHERA CATEGORIES</th>
<th>RESPONSE ACTIONS REQUIRED BY AHERA</th>
</tr>
</thead>
<tbody>
<tr>
<td>7</td>
<td>1</td>
<td>SIGNIFICANT DAMAGE</td>
<td>IMMEDIATELY EVACUATE THE AREA IF NEEDED. REMOVE THE ACBM (OR ENCLOSE OR ENCAPSULATE IF SUFFICIENT TO CONTAIN FIBERS). REPAIR IS ALLOWED IF FEASIBLE AND SAFE. REGULATORY O&amp;M PROCEDURES REQUIRED FOR ALL FRIABLE ACBM.</td>
</tr>
<tr>
<td>6</td>
<td>2</td>
<td>DAMAGE + POTENTIAL FOR SIGNIFICANT DAMAGE</td>
<td>REMOVE, ENCLOSE, ENCAPSULATE OR REPAIR TO CORRECT DAMAGE. TAKE STEPS TO REDUCE POTENTIAL FOR DISTURBANCE (APPLY PREVENTIVE MEASURES). REGULATORY O&amp;M PROCEDURES REQUIRED FOR ALL FRIABLE ACBM</td>
</tr>
<tr>
<td>5</td>
<td>3</td>
<td>DAMAGE + POTENTIAL FOR DAMAGE</td>
<td>REMOVE, ENCLOSE, ENCAPSULATE OR REPAIR TO CORRECT DAMAGE. REGULATORY O&amp;M PROCEDURES REQUIRED FOR ALL FRIABLE ACBM</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
<td>DAMAGE + LOW POTENTIAL DISTURBANCE</td>
<td>SAME AS HAZARD RANK 5. PRIORITIZE TO CHOOSE THE LEAST BURDENSOME METHOD.</td>
</tr>
<tr>
<td>3</td>
<td>5</td>
<td>GOOD + POTENTIAL FOR SIGNIFICANT DAMAGE</td>
<td>ALL 5 RESPONSE ACTIONS ARE AVAILABLE. TAKE STEPS TO REDUCE POTENTIAL FOR DISTURBANCE. APPLY PREVENTIVE MEASURES. REGULATORY O&amp;M PROCEDURES FOR ALL FRIABLE ACBM AND TSI. O&amp;M MAY BE CHOSEN AS INITIAL RESPONSE.</td>
</tr>
<tr>
<td>2</td>
<td>6</td>
<td>GOOD + POTENTIAL FOR DAMAGE</td>
<td>ALL 5 RESPONSE ACTIONS ARE ALLOWED. REGULATORY O&amp;M REQUIRED FOR ALL FRIABLE AND TSI. O&amp;M MAY BE CHOSEN INITIAL RESPONSE ACTION.</td>
</tr>
<tr>
<td>1</td>
<td>7</td>
<td>ALL REMAINING ACBM</td>
<td>ALL 5 RESPONSE ACTIONS ALLOWED. REGULATORY O&amp;M REQUIRED FOR ALL FRIABLE AND TSI. REQUIRES A RESPONSE ACTION. O&amp;M MAY BE CHOSEN AS INITIAL RESPONSE ACTION.</td>
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B) SAMPLE COLLECTION LOGS ........................................... 010
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LIST OF HOMOGENEOUS AREAS (763.85)

During the mandatory initial AHERA inspection, a complete visual inspection was performed to acquaint the inspectors with the general layout of the facility or sections of the facility that are covered under AHERA regulations. The following homogeneous areas were observed. These areas/materials represent building materials of the same type, style, and composition which were used in the same manner.

The following table summarizes whether the homogeneous area is Friable or Non-Friable; Surfacing Material, Thermal System Insulation, or Miscellaneous Material; Material Description; Material Location; Approximate square footage or linear footage for each material; Whether the material was Tested or Assumed ACM; the Laboratory that analyzed the bulk samples, Bulk sample numbers, and the date analyzed; and also which AHERA Category the material is, if applicable.

For an explanation of the AHERA Categories and the way each material is assessed to be in that category, see the Abbreviation Key. To see what condition each Homogeneous Area is in, see the Inspection Forms and the Physical Assessment Data (Friable Materials) for each individual Area.
# LIST OF HOMOGENEOUS AREAS

**CLIENT:** Whiteriver Unified School District  
**FACILITY:** Activity Center  
**DATE:** 04/20/2017  
**BUILDING:** Activity Center

<table>
<thead>
<tr>
<th>HA #</th>
<th>TYPE F / NF</th>
<th>MATERIAL DESCRIPTION</th>
<th>MATERIAL LOCATION</th>
<th>AMOUNT SF / LF</th>
<th>TEST RESULTS</th>
<th>AHERA #</th>
</tr>
</thead>
<tbody>
<tr>
<td>01</td>
<td>MISC F</td>
<td>2x4 Tectum Ceiling Panels</td>
<td>Located in various areas throughout the building</td>
<td>18,410 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>02A</td>
<td>MISC NF</td>
<td>Drywall Material</td>
<td>Located on various surfaces throughout the building</td>
<td>8,540 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>02B</td>
<td>MISC NF</td>
<td>Drywall Texture</td>
<td>Located on various surfaces throughout the building</td>
<td>8,540 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>02C</td>
<td>MISC NF</td>
<td>Drywall Compound</td>
<td>Located on various surfaces throughout the building</td>
<td>8,540 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>03</td>
<td>MISC NF</td>
<td>Interior Paint (On Block)</td>
<td>Located on interior painted masonry surfaces</td>
<td>59,620 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>04</td>
<td>MISC NF</td>
<td>Masonry Block and Mortar</td>
<td>Located in perimeter &amp; various interior walls, exposed &amp; behind other wall systems</td>
<td>42,000 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>05</td>
<td>MISC NF</td>
<td>Baseboard Adhesive</td>
<td>Located in various areas throughout the building</td>
<td>4,300 lf. @ 4&quot;</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>06A</td>
<td>MISC NF</td>
<td>12x12 Floor Tile</td>
<td>Located in the West Classrooms</td>
<td>1,560 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Key:**  
- **HA** - HOMOGENEOUS AREA #  
- **SF** - SQUARE FEET  
- **LF** - LINEAR FEET  
- **RM** - ROOM  
- **TSI** - THERMAL SYSTEM INSULATION  
- **MISC** - MISCELLANEOUS MATERIAL  
- **SM** - SURFACING MATERIAL  
- **F** - FRIABLE  
- **NF** - NON-FRIABLE  
- **(A)** - ASSUMED  
- **(T)** - TESTED
# LIST OF HOMOGENEOUS AREAS

**CLIENT:** Whiteriver Unified School District  
**FACILITY:** Activity Center  
**DATE:** 04/20/2017  
**BUILDING:** Activity Center

<table>
<thead>
<tr>
<th>HA #</th>
<th>TYPE F / NF</th>
<th>MATERIAL DESCRIPTION</th>
<th>MATERIAL LOCATION</th>
<th>AMOUNT SF / LF</th>
<th>TEST RESULTS</th>
<th>AHERA #</th>
</tr>
</thead>
<tbody>
<tr>
<td>06B</td>
<td>MISC NF</td>
<td>Floor Tile Mastic</td>
<td>Located under HA 06A</td>
<td>1,560 sf.</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>07</td>
<td>MISC NF</td>
<td>HVAC Duct Seam Mastic</td>
<td>Located on HVAC equipment / duct work in various areas throughout the plenum</td>
<td>Unquantified</td>
<td>Negative</td>
<td>N/A</td>
</tr>
<tr>
<td>08</td>
<td>MISC NF</td>
<td>Ceramic Tile Systems</td>
<td>Located in the Restrooms, Locker Rooms, and Coaches Offices</td>
<td>5,060 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>09</td>
<td>MISC NF</td>
<td>Sink Acoustical Coating</td>
<td>Located on the underside of the sink in the Concessions Stand</td>
<td>10 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>10</td>
<td>MISC NF</td>
<td>Spray-on Floor Texture</td>
<td>Located on concrete floors in the Restrooms</td>
<td>1,400 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>11</td>
<td>MISC NF</td>
<td>Exterior Paint (On Block)</td>
<td>Located on exterior masonry wall surfaces</td>
<td>15,000 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>12</td>
<td>MISC NF</td>
<td>Exterior Stucco</td>
<td>Located on various exterior surfaces</td>
<td>16,000 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>13</td>
<td>MISC NF</td>
<td>Frame Caulking</td>
<td>Located around door and window frames in the masonry wall systems</td>
<td>770 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**Legend:**  
- **HA #** - HOMOGENEOUS AREA 
- **F** - FRIABLE  
- **NF** - NON-FRIABLE  
- **SF** - SQUARE FEET  
- **LF** - LINEAR FEET  
- **RM** - ROOM  
- **TSI** - THERMAL SYSTEM INSULATION  
- **MISC** - MISCELLANEOUS MATERIAL  
- **SM** - SURFACING MATERIAL  
- **(A)** - ASSUMED  
- **(T)** - TESTED
# LIST OF HOMOGENEOUS AREAS

**CLIENT:** Whiteriver Unified School District  
**FACILITY:** Activity Center  
**DATE:** 04/20/2017  
**BUILDING:** Activity Center

<table>
<thead>
<tr>
<th>HA #</th>
<th>TYPE F / NF</th>
<th>MATERIAL DESCRIPTION</th>
<th>MATERIAL LOCATION</th>
<th>AMOUNT SF / LF</th>
<th>TEST RESULTS</th>
<th>AHERA #</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>MISC NF</td>
<td>Window Putty</td>
<td>Located around window panes in the window systems</td>
<td>250 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>15</td>
<td>MISC NF</td>
<td>Building Expansion Joint</td>
<td>Located within the masonry wall systems</td>
<td>1,500 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>16</td>
<td>MISC NF</td>
<td>Concrete Material</td>
<td>Floor slabs / foundation</td>
<td>52,600 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**NOTES:**  
- HA - HOMOGENEOUS AREA #  
- NF - NON-FRIABLE  
- F - FRIABLE  
- SF - SQUARE FEET  
- LF - LINEAR FEET  
- TSI - THERMAL SYSTEM INSULATION  
- MISC - MISCELLANEOUS MATERIAL  
- SM - SURFACING MATERIAL  
- (A) - ASSUMED  
- (T) - TESTED
BULK SAMPLE COLLECTION FORM

The following pages are copies of the field sample collection forms used during this inspection. It will include the following data:

Column 1: Test result - Negative (-) or Positive (+);

Column 2: Bulk material sample number will correspond to the laboratory analysis sheets.

Column 3: Material Description;

Column 4: Room or area where bulk sample was taken;

Column 5: Location in the room where bulk sample was taken; Example - NW corner, 3'W (west), 2' E (east), 4' AFF (above finished floor);
<table>
<thead>
<tr>
<th></th>
<th>#</th>
<th>Material</th>
<th>Room/Area</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>1</td>
<td>Tectum 2x1 Ceiling Panels</td>
<td>NE Upper Lobby</td>
<td>Origin: NW: E/W; N 04 AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>2</td>
<td></td>
<td>SW Upper Lobby</td>
<td>Origin: SW: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>3</td>
<td></td>
<td>North Lower Hall</td>
<td>Origin: NE: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>4</td>
<td></td>
<td>SE Lower Lobby</td>
<td>Origin: NW: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>5</td>
<td></td>
<td>NW Lower Lobby</td>
<td>Origin: NW: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>6</td>
<td>Drywall Texture</td>
<td>Upper Men's Restroom</td>
<td>Origin: SE: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>7</td>
<td></td>
<td>Girl's Locker Room</td>
<td>Origin: NE; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>7</td>
<td></td>
<td>Upper West Mechanical</td>
<td>Origin: SE; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>7</td>
<td></td>
<td>Upper Women's Restroom</td>
<td>Origin: NW; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>10</td>
<td></td>
<td>Lower Weight Room</td>
<td>Origin: NW: E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>16</td>
<td>Drywall Compound</td>
<td>Upper Men's Restroom</td>
<td>Origin: SE; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>17</td>
<td></td>
<td>Girl's Locker Room</td>
<td>Origin: NE; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>18</td>
<td></td>
<td>Upper West Mechanical</td>
<td>Origin: SE; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>19</td>
<td></td>
<td>Upper Women's Restroom</td>
<td>Origin: NW; E/W; N/S; AFF 8</td>
</tr>
<tr>
<td>-</td>
<td>20</td>
<td></td>
<td>Lower Weight Room</td>
<td>Origin: NW: E/W; N/S; AFF 8</td>
</tr>
</tbody>
</table>

Origin - Corner of room or start point - NW corner, NE Unit, etc.;

E/W or N/S - Insert foliage and circle the direction you travel to the sample location;

AFF - Above finished floor - height of sample.
<table>
<thead>
<tr>
<th></th>
<th>#</th>
<th>Material/Location</th>
<th>Room/Area</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>Paint, Block, Mortar</td>
<td>Lower South Mechanical</td>
<td>NW/E/W, NS, AFF 4</td>
</tr>
<tr>
<td>2</td>
<td></td>
<td>Gymnasium</td>
<td></td>
<td>NE/E/W, NS, AFF 3</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Boys Towel Room</td>
<td></td>
<td>NW/E/W, NS, AFF 5</td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Upper Men's Restroom</td>
<td></td>
<td>SE/E/W, NS, AFF 5</td>
</tr>
<tr>
<td>5</td>
<td></td>
<td>Upper Women's Restroom</td>
<td></td>
<td>SW/E/W, NS, AFF 4</td>
</tr>
<tr>
<td>6</td>
<td></td>
<td>Baseboard Adhesive</td>
<td>Main Lobby</td>
<td>NE/E/W, NS, AFF</td>
</tr>
<tr>
<td>7</td>
<td></td>
<td>South Lower Hall</td>
<td></td>
<td>SE/E/W, NS, AFF</td>
</tr>
<tr>
<td>8</td>
<td></td>
<td>Gymnasium</td>
<td></td>
<td>NE/E/W, NS, AFF</td>
</tr>
<tr>
<td>9</td>
<td></td>
<td>Upper NE Mechanical</td>
<td></td>
<td>NW/E/W, NS, AFF</td>
</tr>
<tr>
<td>10</td>
<td></td>
<td>Upper SE Mechanical</td>
<td></td>
<td>SE/E/W, NS, AFF</td>
</tr>
<tr>
<td>11</td>
<td>101</td>
<td>12x12 Floor, Mastic</td>
<td>NW Classroom</td>
<td>SE/E/W, NS, AFF</td>
</tr>
<tr>
<td>12</td>
<td>102</td>
<td>SW Classroom</td>
<td></td>
<td>SW/E/W, NS, AFF</td>
</tr>
<tr>
<td>13</td>
<td></td>
<td>SW Classroom</td>
<td></td>
<td>NE/E/W, NS, AFF</td>
</tr>
</tbody>
</table>

**Origin** - Corner of room or start point - NW corner, NE Unit, etc.;

**E/W or N/S** - Insert footage and circle the direction you travel to the sample location;

**AFF** - Above finished floor - height of sample,
**FIELD SAMPLE SHEET**

**Site:** Activity Center  
**Building:** Main  
**Date:** 5/1/2014  
**Inspector:** Benjamin Jones

<table>
<thead>
<tr>
<th>#</th>
<th>Material</th>
<th>Room/Area</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>-</td>
<td>HVAC Duct Seem Master</td>
<td>NE Upper Mechanical</td>
<td>Origin: E/W; N/S; AFF</td>
</tr>
<tr>
<td>-</td>
<td>47</td>
<td></td>
<td>Origin: E/W; N/S; AFF</td>
</tr>
<tr>
<td>-</td>
<td>46</td>
<td>SE Upper Mechanical</td>
<td>Origin: E/W; N/S; AFF</td>
</tr>
<tr>
<td>-</td>
<td>49</td>
<td>SW Classroom</td>
<td>Origin: E/W; N/S; AFF</td>
</tr>
</tbody>
</table>

Origin - Corner of room or start point - NW corner, NE Unit, etc.
E/W or N/S - Insert footage and circle the direction you travel to the sample location.
AFF - Above finished floor - height of sample.
## SUMMARY OF ASBESTOS CONTAINING MATERIALS (763.88)

**CLIENT:** Whiteriver Unified School District  
**FACILITY:** Activity Center  
**DATE:** 04/20/2017  
**BUILDING:** Activity Center

<table>
<thead>
<tr>
<th>HA #</th>
<th>TYPE F / NF</th>
<th>MATERIAL DESCRIPTION</th>
<th>MATERIAL LOCATION</th>
<th>AMOUNT SF / LF</th>
<th>TEST RESULTS</th>
<th>AHERA #</th>
</tr>
</thead>
<tbody>
<tr>
<td>08</td>
<td>MISC NF</td>
<td>Ceramic Tile Systems</td>
<td>Located in the Restrooms, Locker Rooms, and Coaches Offices</td>
<td>5,060 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>09</td>
<td>MISC NF</td>
<td>Sink Acoustical Coating</td>
<td>Located on the underside of the sink in the Concessions Stand</td>
<td>10 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>10</td>
<td>MISC NF</td>
<td>Spray-on Floor Texture</td>
<td>Located on concrete floors in the Restrooms</td>
<td>1,400 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>11</td>
<td>MISC NF</td>
<td>Exterior Paint (On Block)</td>
<td>Located on exterior masonry wall surfaces</td>
<td>15,000 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>12</td>
<td>MISC NF</td>
<td>Exterior Stucco</td>
<td>Located on various exterior surfaces</td>
<td>16,000 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>13</td>
<td>MISC NF</td>
<td>Frame Caulking</td>
<td>Located around door and window frames in the masonry wall systems</td>
<td>770 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>14</td>
<td>MISC NF</td>
<td>Window Putty</td>
<td>Located around window panes in the window systems</td>
<td>250 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
<tr>
<td>15</td>
<td>MISC NF</td>
<td>Building Expansion Joint</td>
<td>Located within the masonry wall systems</td>
<td>1,500 lf. @ 1&quot;</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**INSPECTOR / ASSESSOR'S NAME:** Patricia Francis  
**INSPECTOR / ASSESSOR'S Signature:**  
**EPA ACCREDITATION #:** EPA# 25511-23922356-289373 (Exp.08/14/17)  
**DATE OF INSPECTION:** 04/20/2017
### SUMMARY OF ASBESTOS CONTAINING MATERIALS (763.88)

**CLIENT:** Whiteriver Unified School District  
**FACILITY:** Activity Center  
**DATE:** 04/20/2017  
**BUILDING:** Activity Center

<table>
<thead>
<tr>
<th>HA #</th>
<th>TYPE F / NF</th>
<th>MATERIAL DESCRIPTION</th>
<th>MATERIAL LOCATION</th>
<th>AMOUNT SF / LF</th>
<th>TEST RESULTS</th>
<th>AHERA #</th>
</tr>
</thead>
<tbody>
<tr>
<td>16</td>
<td>MISC NF</td>
<td>Concrete Material</td>
<td>Floor slabs / foundation</td>
<td>52,800 sf.</td>
<td>Assumed</td>
<td>N/A</td>
</tr>
</tbody>
</table>

**INSPECTOR / ASSESSOR'S NAME:** Patricia Francis  
**EPA ACCREDITATION #:** EPA# 25511-2392356-289373 (Exp.08/14/17)  
**DATE OF INSPECTION:** 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 08 FUNCTIONAL SPACE: 8.1

HOMOGENEOUS AREA DESCRIPTION: Ceramic Tile Systems

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: 
MISC.: X 
B.B.A.: 
V.A.T.: 
S.M.: 
FRIABLE: 
NON-FRIABLE: X 
ASSUMED: X 
TESTED: 

DESCRIPTION: Ceramic Tile Systems

AMOUNT OF MATERIAL 5,060 sf.

ACCESSIBILITY

YES: X NO: 
COMMENTS: 

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X 
DAMAGED: 
SIG. DAMAGE: 
POT. DAMAGE: 
POT. SIG. DAMAGE: 
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: NO: X
POTENTIAL FOR VIBRATION: YES: X NO: 

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR’S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)

INSPECTOR’S SIGNATURE: 

ASSESSOR’S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)

ASSESSOR’S SIGNATURE: 

DATE: 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 09 FUNCTIONAL SPACE: 9.1

HOMOGENEOUS AREA DESCRIPTION: Sink Acoustical Coating

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRIABLE: 
MISC.: X NON-FRIABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED:
S.M.: 

DESCRIPTION: Sink Undercoat

AMOUNT OF MATERIAL 10 sf.

ACCESSIBILITY

YES: X NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (% OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: NO: X
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR’S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)

INSPECTOR’S SIGNATURE: 

ASSESSOR’S NAME: Patricia Francis

ASSESSOR’S SIGNATURE: 

DATE: 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 10 FUNCTIONAL SPACE: 10.1

HOMOGENEOUS AREA DESCRIPTION: Spray-on Floor Texture

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRIABLE:
MISC.: X NON-FRIABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED:
S.M.:

DESCRIPTION: Flooring

AMOUNT OF MATERIAL: 1,400 sf.

ACCESSIBILITY

YES: X NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: NO: X
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR'S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)
INSPECTOR'S SIGNATURE: Patricia Francis
ASSESSOR'S NAME: EPA# 25511-2392356-289373 (Exp.08/14/17)
ASSESSOR'S SIGNATURE: Patricia Francis
DATE: 04/20/2017

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A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 11 FUNCTIONAL SPACE: 11.1

HOMOGENEOUS AREA DESCRIPTION: Exterior Paint (on Block)

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRiABLE: 
MISC.: X NON-FRiABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED:
S.M.:

DESCRIPTION: Wall Systems

AMOUNT OF MATERIAL 15,000 sf.

ACCESSIBILITY

YES: X NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: X NO:
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-frangible ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR’S NAME: Patricia Francis
INSPECTOR’S SIGNATURE: 

ASSESSOR’S NAME: Patricia Francis
ASSESSOR’S SIGNATURE: 

DATE: 04/20/2017

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A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 12  FUNCTIONAL SPACE: 12.1

HOMOGENEOUS AREA DESCRIPTION: Exterior Stucco

BUILDING: Activity Center  MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRIABLE:
MISC.: X  NON-FRIABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED:
S.M.:

DESCRIPTION: Wall Systems

AMOUNT OF MATERIAL 16,000 sf.

ACCESSIBILITY

YES: X  NO:  COMMENTS:

CONDITION OF MATERIAL AND EXTENT (% OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:
POTENTIAL FOR AIR EROSION: YES: NO: X
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR'S NAME: Patricia Francis  EPA# 25511-2392356-289373 (Exp.08/14/17)
INSPECTOR'S SIGNATURE:

ASSESSOR'S NAME: Patricia Francis  EPA# 25511-2392356-289373 (Exp.08/14/17)
ASSESSOR'S SIGNATURE:

DATE: 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 13 FUNCTIONAL SPACE: 13.1

HOMOGENEOUS AREA DESCRIPTION: Frame Caulking

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRIABLE:
MISC.: X NON-FRIABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED:
S.M.:

DESCRIPTION: Doors & Window

AMOUNT OF MATERIAL 770 lf. @ 1"

ACCESSIBILITY

YES: X NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: X NO:
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR'S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)
INSPECTOR'S SIGNATURE:
ASSESSOR'S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)
ASSESSOR'S SIGNATURE:
DATE: 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 14 FUNCTIONAL SPACE: 14.1

HOMOGENEOUS AREA DESCRIPTION: Window Putty

BUILDING: Activity Center MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.:        FRIABLE:
MISC.: X       NON-FRIABLE: X
B.B.A.:        ASSUMED: X
V.A.T.:        TESTED:
S.M.:          

DESCRIPTION: Window Systems

AMOUNT OF MATERIAL 250 lf. @ 1"

ACCESSIBILITY

YES: X NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: X NO:
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR’S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)
INSPECTOR’S SIGNATURE: 
ASSESSOR’S NAME: Patricia Francis EPA# 25511-2392356-289373 (Exp.08/14/17)
ASSESSOR’S SIGNATURE: 
DATE: 04/20/2017
**A.H.E.R.A. INSPECTION FORM**

**FACILITY:** Activity Center

**HOMOGENEOUS AREA #:** 15  **FUNCTIONAL SPACE:** 15.1

**HOMOGENEOUS AREA DESCRIPTION:** Building Expansion Joint

**BUILDING:** Activity Center  **MATERIAL LOCATION:** See ACM Summary

**TYPE OF SUSPECT MATERIAL**

<table>
<thead>
<tr>
<th>T.S.I.</th>
<th>FRIABLE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>MISC.:</td>
<td>X</td>
</tr>
<tr>
<td>B.B.A.:</td>
<td>NON-FRIABLE: X</td>
</tr>
<tr>
<td>V.A.T.:</td>
<td>ASSUMED: X</td>
</tr>
<tr>
<td>S.M.:</td>
<td>TESTED:</td>
</tr>
</tbody>
</table>

**DESCRIPTION:** Wall Systems

**AMOUNT OF MATERIAL:** 1,500 ft. @ 1"

**ACCESSIBILITY**

**YES:** X  **NO:**  **COMMENTS:**

**CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE**

**NOT DAMAGED:** X

**DAMAGED:**

**SIG. DAMAGE:**

**POT. DAMAGE:**

**POT. SIG. DAMAGE:**

**OTHER:**

**FREQUENCY OF DAMAGE:**

**LOCALIZED:**

**DISTRIBUTED:**

**POTENTIAL FOR AIR EROSION:**

**YES:**

**NO:** X

**POTENTIAL FOR VIBRATION:**

**YES:**

**NO:** X

**ASSESSMENT:** Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

**INSPECTOR’S NAME:** Patricia Francis  **EPA#** 25511-2392356-289373 (Exp.08/14/17)

**INSPECTOR'S SIGNATURE:**

**ASSESSOR’S NAME:** Patricia Francis  **EPA#** 25511-2392356-289373 (Exp.08/14/17)

**ASSessor’s SIGNATURE:**

**DATE:** 04/20/2017
A.H.E.R.A. INSPECTION FORM

FACILITY: Activity Center

HOMOGENEOUS AREA #: 16  FUNCTIONAL SPACE: 16.1

HOMOGENEOUS AREA DESCRIPTION: Concrete Material

BUILDING: Activity Center  MATERIAL LOCATION: See ACM Summary

TYPE OF SUSPECT MATERIAL

T.S.I.: FRIABLE: 
MISC.: X  NON-FRIABLE: X
B.B.A.: ASSUMED: X
V.A.T.: TESTED: 
S.M.: 

DESCRIPTION: Slab / Foundation

AMOUNT OF MATERIAL 52,600 sf.

ACCESSIBILITY

YES: X  NO: COMMENTS:

CONDITION OF MATERIAL AND EXTENT (%) OF DAMAGE

NOT DAMAGED: X
DAMAGED:
SIG. DAMAGE:
POT. DAMAGE:
POT. SIG. DAMAGE:
OTHER:

FREQUENCY OF DAMAGE: LOCALIZED: DISTRIBUTED:

POTENTIAL FOR AIR EROSION: YES: NO: X
POTENTIAL FOR VIBRATION: YES: NO: X

ASSESSMENT: Undamaged non-friable ACM with low potential for damage. Material is in good condition. No debris was observed at the time of the inspection.

INSPECTOR'S NAME: Patricia Francis  EPA# 25511-2392356-289373 (Exp.08/14/17)
INSPECTOR'S SIGNATURE: 

ASSESSOR'S NAME: Patricia Francis  EPA# 25511-2392356-289373 (Exp.08/14/17)
ASSESSOR'S SIGNATURE: 
DATE: 04/20/2017
REMAINING NON-FRIABLE ACM

Continue O & M Plan to maintain the remaining non-friable ACM in at least their present condition. This would include periodic inspections (at least every 6 months) to determine material condition and repair of any detected damage. Maintenance and custodial staff should be made aware of the exact locations of these materials.

All activities involving the Non-Friable ACM materials should be completed using approved methods described under the O & M Plan.

Removal of any of the Assumed Asbestos Containing Materials contained in this report should not be attempted without express written permission from your Designated Person.
**Bulk Asbestos Analysis by Polarized Light Microscopy**

**NVLAP#101926-0**

<table>
<thead>
<tr>
<th>Lab ID</th>
<th>Sample Location</th>
<th>Layer Name / Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
</tr>
</thead>
<tbody>
<tr>
<td>0140617-001</td>
<td>NE UPPER LOBBY</td>
<td>2x4 Ceiling Panel, Tectum, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Carbonates</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Gyptsum</td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Binder/Filler</td>
</tr>
<tr>
<td>0140617-002</td>
<td>SW UPPER LOBBY</td>
<td>2x4 Ceiling Panel, Tectum, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Carbonates</td>
</tr>
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<td></td>
<td>Gyptsum</td>
</tr>
<tr>
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<td></td>
<td></td>
<td>Binder/Filler</td>
</tr>
<tr>
<td>0140617-003</td>
<td>N. LOWER HALL</td>
<td>2x4 Ceiling Panel, Tectum, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Carbonates</td>
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<td>Gyptsum</td>
</tr>
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<td></td>
<td></td>
<td>Binder/Filler</td>
</tr>
<tr>
<td>0140617-004</td>
<td>SE LOWER LOBBY</td>
<td>2x4 Ceiling Panel, Tectum, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td>Carbonates</td>
</tr>
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<td>Gyptsum</td>
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<td>Binder/Filler</td>
</tr>
<tr>
<td>0140617-005</td>
<td>NW LOWER LOBBY</td>
<td>2x4 Ceiling Panel, Tectum, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
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<td></td>
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<td>Gyptsum</td>
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<td>Binder/Filler</td>
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<tr>
<td>0140617-006</td>
<td>UPPER MEN'S RESTRM</td>
<td>Drywall, Brown Note: No Paper Backing Present</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
<td></td>
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<td></td>
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<td></td>
<td>Fibrous Glass</td>
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<td>Gypsum</td>
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<td>Carbonates</td>
</tr>
<tr>
<td>0140617-007</td>
<td>GIRL'S LOCKER RM</td>
<td>Drywall, White/ Brown</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber</td>
</tr>
<tr>
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<td>Carbonates</td>
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</table>

Page 1 of 9
## Bulk Asbestos Analysis by Polarized Light Microscopy

### EMC Labs, Inc.

**Client:** EMC², LLC  
**Address:** 9830 S. 51st Street, Suite B109, Phoenix, AZ 85044

**Project Name:** WHITERIVER SCHOOLS-ACTIVITY CENTER

<table>
<thead>
<tr>
<th>Lab ID</th>
<th>Client ID</th>
<th>Sample Location</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
</tr>
</thead>
</table>
| 0140617-008 | 8 | UPPER WEST MECHANICAL | Drywall, Brown | No | None Detected | Cellulose Fiber 10%  
Fibrous Glass 2%  
Gypsum  
Mica  
Carbonates 88% |
| 0140617-009 | 9 | UPPER WOMEN'S RESTRM | Drywall, White/Brown | No | None Detected | Cellulose Fiber 10%  
Fibrous Glass 2%  
Gypsum  
Mica  
Carbonates 88% |
| 0140617-010 | 10 | LOWER WEIGHT RM | Drywall, White/Brown | No | None Detected | Cellulose Fiber 10%  
Fibrous Glass 2%  
Gypsum  
Mica  
Carbonates 88% |
| 0140617-011 | 11 | UPPER MEN'S RESTRM | Texture, Cream/White | No | None Detected | Carbonates  
Mica  
Quartz  
Perlite  
Binder/Filler 100% |
| 0140617-012 | 12 | GIRL'S LOCKER RM | Texture, Cream/White | No | None Detected | Carbonates  
Mica  
Quartz  
Perlite  
Binder/Filler 100% |
| 0140617-013 | 13 | UPPER WEST MECHANICAL | Texture, Cream/White | No | None Detected | Carbonates  
Mica  
Quartz  
Perlite  
Binder/Filler 100% |

**Job# / P.O. #:** 0140617  
**Date Received:** 05/02/2014  
**Date Analyzed:** 05/16/2014  
**Date Reported:** 05/19/2014  
**EPA Method:** EPA 600/R-93/116  
**Submitted By:** CLIENT

**Collected By:**
### Bulk Asbestos Analysis by Polarized Light Microscopy

**NVLAP#101926-0**

**Client:** EMC², LLC  
**Address:** 9830 S. 51ST ST. STE B109 PO BOX 720  
**PHOENIX AZ 85044**

**Collected:** 05/01/2014  
**Project Name:** WHITERIVER SCHOOLS-ACTIVITY CENTER  
**Address:**

**Job# / P.O. #:**  
**Date Received:** 05/02/2014  
**Date Analyzed:** 05/16/2014  
**Date Reported:** 05/19/2014  
**EPA Method:** EPA 600/R-93/116  
**Submitted By:** CLIENT

---

<table>
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<tr>
<th>Lab ID</th>
<th>Sample Location</th>
<th>Sample Description</th>
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<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
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<tbody>
<tr>
<td>0140617-014</td>
<td>UPPER WOMEN'S</td>
<td>Texture, Cream/White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler, 100%</td>
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<tr>
<td>0140617-015</td>
<td>LOWER WEIGHT</td>
<td>Texture, Cream/White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler, 100%</td>
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<tr>
<td>0140617-016</td>
<td>UPPER MEN'S</td>
<td>Drywall Compound, Cream/White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler, 100%</td>
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<tr>
<td>0140617-017</td>
<td>GIRL'S LOCKER</td>
<td>Drywall Compound, Cream/White</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber, Carbonates, Mica, Quartz, Perlite, Binder/Filler, 99%</td>
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<tr>
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<td>UPPER WEST</td>
<td>Drywall Compound, Cream/White</td>
<td>No</td>
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<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler, 100%</td>
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<tr>
<td>Lab ID</td>
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<td>Asbestos Type (%)</td>
<td>Non-Asbestos Constituents</td>
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<td>0140617-019 19</td>
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<td>Drywall Compound, Cream/ White</td>
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<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler 100%</td>
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<td>0140617-020 20</td>
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<td>Carbonates, Mica, Quartz, Perlite, Binder/Filler 100%</td>
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<td>0140617-021 21</td>
<td>LOWER S. MECHANICAL</td>
<td>Paint, White/ Off White Note: Difficult to separate adjacent layer</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Quartz, Binder/Filler 100%</td>
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<td>0140617-022 22</td>
<td>GYMNASIUM</td>
<td>Paint, Mauve/ White Note: Difficult to separate adjacent layer</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Quartz, Binder/Filler 100%</td>
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<tr>
<td>0140617-023 23</td>
<td>BOYS TOWEL RM</td>
<td>Paint, White/ Off White Note: Difficult to separate adjacent layer</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Quartz, Binder/Filler 100%</td>
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<td>0140617-024 24</td>
<td>UPPER MEN'S RESTRM</td>
<td>Paint, White/ Off White Note: Difficult to separate adjacent layer</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Quartz, Binder/Filler 100%</td>
</tr>
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</table>
## Bulk Asbestos Analysis by Polarized Light Microscopy

**NVLAP#101926-0**

### Details
- **Client:** EMC®, LLC
- **Address:** 9830 S. 51ST ST. STE B109
  - PHOENIX, AZ 85044
- **Collected:** 05/01/2014
- **Project Name:** WHITERIVER SCHOOLS-ACTIVITY CENTER

### Laboratory Report
- **Job# / P.O. #:**
- **Date Received:** 05/02/2014
- **Date Analyzed:** 05/16/2014
- **Date Reported:** 05/19/2014
- **EPA Method:** EPA 600/R-93/116
- **Submitted By:** CLIENT

### Results

<table>
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<tr>
<th>Lab ID</th>
<th>Sample Location</th>
<th>Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
</tr>
</thead>
</table>
| 0140617-025 | UPPER WOMEN'S RESTRM | Paint, White/ Off White Note: Difficult to separate adjacent layer | No | None Detected | Carbonates
|        |                  |                   |                   |                   | Gypsum
|        |                  |                   |                   |                   | Quartz
|        |                  |                   |                   |                   | Binder/Filler 100% |
| 0140617-026 | LOWER S. MECHANICAL | Block, Red/ Gray | No | None Detected | Quartz
|        |                  |                   |                   |                   | Gypsum
|        |                  |                   |                   |                   | Mica
|        |                  |                   |                   |                   | Carbonates
|        |                  |                   |                   |                   | Binder/Filler 100% |
| 0140617-027 | GYMNASIUM | Block, Red/ Gray | No | None Detected | Quartz
|        |                  |                   |                   |                   | Gypsum
|        |                  |                   |                   |                   | Mica
|        |                  |                   |                   |                   | Carbonates
|        |                  |                   |                   |                   | Binder/Filler 100% |
| 0140617-028 | BOYS TOWEL RM | Block, Red/ Gray | No | None Detected | Quartz
|        |                  |                   |                   |                   | Gypsum
|        |                  |                   |                   |                   | Mica
|        |                  |                   |                   |                   | Carbonates
|        |                  |                   |                   |                   | Binder/Filler 100% |
| 0140617-029 | UPPER MENS RESTRM | Block, Red/ Gray | No | None Detected | Quartz
|        |                  |                   |                   |                   | Gypsum
|        |                  |                   |                   |                   | Mica
|        |                  |                   |                   |                   | Carbonates
|        |                  |                   |                   |                   | Binder/Filler 100% |
### Bulk Asbestos Analysis by Polarized Light Microscopy

**Client:** EMC², LLC  
**Address:** 9830 S. 51ST ST. STE B109  
**City:** PHOENIX  
**State:** AZ  
**Zip Code:** 85044  
**Job# / P.O. #:** 0140617  
**Date Received:** 05/02/2014  
**Date Analyzed:** 05/16/2014  
**Date Reported:** 05/19/2014  
**Project Name:** WHITERIVER SCHOOLS-ACTIVITY CENTER  
**Submitted By:** CLIENT

<table>
<thead>
<tr>
<th>Lab ID</th>
<th>Sample Location</th>
<th>Layer Name / Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
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<tbody>
<tr>
<td>0140617-030</td>
<td>UPPER WOMEN'S RESTRM</td>
<td>Block, Red/ Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
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<tr>
<td>0140617-031</td>
<td>LOWER S. MECHANICAL</td>
<td>Mortar, Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
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<tr>
<td>0140617-032</td>
<td>GYMNASIUM</td>
<td>Mortar, Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
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<tr>
<td>0140617-033</td>
<td>BOYS TOWEL RM</td>
<td>Mortar, Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
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<tr>
<td>0140617-034</td>
<td>UPPER MEN'S RESTRM</td>
<td>Mortar, Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
</tr>
</tbody>
</table>

Page 6 of 9
**EMC LABS, INC.**  
9830 S. 51st Street, Suite B109, Phoenix, AZ 85044  
Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726

**Bulk Asbestos Analysis by Polarized Light Microscopy**  
NVLAP#101926-0

<table>
<thead>
<tr>
<th>Lab ID</th>
<th>Client ID</th>
<th>Sample Location</th>
<th>Layer Name / Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
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<tbody>
<tr>
<td>0140617-035</td>
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<td>UPPER WOMEN'S RESTRM</td>
<td>Mortar, Gray</td>
<td>No</td>
<td>None Detected</td>
<td>Quartz, Gypsum, Mica, Carbonates, Binder/Filler 100%</td>
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<tr>
<td>0140617-036</td>
<td>36</td>
<td>MAIN LOBBY</td>
<td>Baseboard Adhesive, Off White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Binder/Filler 100%</td>
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<td>0140617-037</td>
<td>37</td>
<td>S. LOWER HALL</td>
<td>Baseboard Adhesive, Off White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Binder/Filler 100%</td>
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<tr>
<td>0140617-038</td>
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<td>GYMNASIUM</td>
<td>LAYER 1, Baseboard Adhesive, Off White</td>
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<td>Cellulose Fiber, Carbonates, Gypsum, Binder/Filler 99%</td>
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<td>LAYER 2, Baseboard Adhesive, Tan</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber, Carbonates, Gypsum, Binder/Filler 1%</td>
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<td>0140617-039</td>
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<td>UPPER NE MECHANICAL</td>
<td>Baseboard Adhesive, Off White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Binder/Filler 100%</td>
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<tr>
<td>0140617-040</td>
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<td>UPPER SE MECHANICAL</td>
<td>Baseboard Adhesive, Off White</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Gypsum, Binder/Filler 100%</td>
</tr>
</tbody>
</table>
**EMC LABS, INC.**  
9830 S. 51st Street, Suite B109, Phoenix, AZ 85044  
Phone: 800-362-3373 or 480-940-5294 - Fax: (480) 893-1726  

**Bulk Asbestos Analysis by Polarized Light Microscopy**  
NVLAP#101926-0  

<table>
<thead>
<tr>
<th>Lab ID</th>
<th>Sample Location</th>
<th>Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
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<tbody>
<tr>
<td>0140617-041</td>
<td>NW CLASSRM</td>
<td>12&quot;x12&quot; Floor Tile, Beige</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Quartz, Binder/Filler 100%</td>
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<tr>
<td>0140617-042</td>
<td>SW CLASSRM</td>
<td>12&quot;x12&quot; Floor Tile, Beige</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Quartz, Binder/Filler 100%</td>
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<tr>
<td>0140617-043</td>
<td>SW CLASSRM</td>
<td>12&quot;x12&quot; Floor Tile, Beige</td>
<td>No</td>
<td>None Detected</td>
<td>Carbonates, Quartz, Binder/Filler 100%</td>
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<td>0140617-044</td>
<td>NW CLASSRM</td>
<td>Mastic, Yellow</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber, Carbonates, Gypsum, Quartz, Binder/Filler &lt;1%</td>
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<tr>
<td>0140617-045</td>
<td>SW CLASSRM</td>
<td>Mastic, Yellow</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber, Carbonates, Gypsum, Quartz, Binder/Filler 99%</td>
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<tr>
<td>0140617-046</td>
<td>SW CLASSRM</td>
<td>Mastic, Yellow</td>
<td>No</td>
<td>None Detected</td>
<td>Cellulose Fiber, Carbonates, Gypsum, Quartz, Binder/Filler 99%</td>
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<tr>
<td>0140617-047</td>
<td>NE UPPER MECHANICAL</td>
<td>HVAC Duct Seam Mastic, White/Gray/Silver</td>
<td>No</td>
<td>None Detected</td>
<td>Aluminum, Carbonates, Gypsum, Binder/Filler 100%</td>
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</tbody>
</table>
**EMC LABS, INC.**  
9830 S. 51st Street, Suite B109, Phoenix, AZ 85044  
Phone: 800-382-3373 or 480-940-5294 - Fax: (480) 893-1726

**Bulk Asbestos Analysis by Polarized Light Microscopy**  
NVLAP#101926-0

<table>
<thead>
<tr>
<th>Client ID</th>
<th>Sample Location</th>
<th>Layer Name / Sample Description</th>
<th>Asbestos Detected</th>
<th>Asbestos Type (%)</th>
<th>Non-Asbestos Constituents</th>
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<tbody>
<tr>
<td>0140617-048</td>
<td>SE UPPER MECHANICAL</td>
<td>HVAC Duct Seam Mastic, White/Gray/ Silver</td>
<td>No</td>
<td>None Detected</td>
<td>Aluminum, Carbonates, Gypsum, Binder/Filler 100%</td>
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<tr>
<td>0140617-049</td>
<td>SW CLASSRM</td>
<td>HVAC Duct Seam Mastic, White/Gray/ Silver</td>
<td>No</td>
<td>None Detected</td>
<td>Aluminum, Carbonates, Gypsum, Binder/Filler 100%</td>
</tr>
</tbody>
</table>

---

*Octavio Gavarreteayestas*

*Signatory - Lab Director - Kurt Kettler*

---

Disclaimer: Analytical results are derived from calibrated visual estimate and measured in area percent unless otherwise noted. The report contains the standards and procedures identified and is the sampling data. The data are not necessarily indicative or representative of the condition of the lot from which the sample was taken or of all samples of similar or similar products, nor do they represent an ongoing quality assurance program unless so noted. These reports are for the exclusive use of the addressed client and that they will not be reproduced wholly or in part for advertising or other purposes without our prior written approval. The report shall not be reproduced except in full, without written approval by our laboratory. The samples are destroyed in testing and retained a maximum of thirty days. The laboratory measurement of uncertainty for the test method is approximately less than 1 by area percent. Accredited by the National Institute of Standards and Technology, Voluntary Laboratory Accreditation Program for selected test methods for asbestos. The accreditation or any reports generated by this laboratory in no way constitutes or signifies product certification, approval, or endorsement by the National Institute of Standards and Technology. The report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government. Polarized Light Microscopy may not be consistently reliable in detecting asbestos in floor coverings and similar non-fragile organically-bound materials.
COMPANY NAME: EMC², LLC  
9830 S. 51ST ST, STE B109  
PHOENIX, AZ 85044  
(800) 362-3373  Fax (480) 893-1726

BILL TO:  
EMC², LLC  
9830 S. 51ST ST, STE B109  
PHOENIX, AZ 85044  
HOWARD LANGE

CONTACT: HOWARD LANGE

now accepting: VISA – MASTERCARD

price quoted: $_____/Sample $_____/Layers

COMPLETE ITEMS 1-4: (Failure to complete any items may cause a delay in processing or analyzing your samples)

1. TURNAROUND TIME: [4hr rush] [8hr rush] [1-Day] [2-Day] [3-Day] [5-Day] [6-10 Day]
   ***Prior confirmation of turnaround time is required.
   ***Additional charges for rush analysis (please call marketing department for pricing details).
   ***Laboratory analysis may be subject to delay if credit terms are not met.

2. TYPE OF ANALYSIS: [Bulk-PLM] [Air-PCM] [Lead] [Point Count] [Fungi: AOC, W-C, Bulk, Swab, Tape]

3. DISPOSAL INSTRUCTIONS: [Dispose of samples at EMC] / [Return samples to me at my expense]
   (If you do not indicate preference, EMC will dispose of samples 60 days from analysis.)

4. Project Name: White River Schools - Activity Center

<table>
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<tr>
<th>P.O. Number:</th>
<th>Project Number:</th>
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<table>
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<th>CLIENT SAMPLE #</th>
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<th>LOCATION/MATERIAL TYPE</th>
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SPECIAL INSTRUCTIONS: Put hard copy in Howard's Box

Sample Collector: (Print) Benjamin Jones  (Signature)  __________

Relinquished by:  __________ Date/Time:  S/1/14  Received by:  __________ Date/Time:  5/2/14

Relinquished by:  __________ Date/Time:  5/2/14  Received by:  __________ Date/Time:  5/2/14

Relinquished by:  __________ Date/Time:  __________  Received by:  __________ Date/Time:  __________

**In the event of any dispute between the above parties for these services or otherwise, parties agree that jurisdiction and venue will be in Phoenix, Arizona and prevailing party will be entitled to attorney's fees and court costs.

Rev. 09/01/08
ACTIVITY PLANS (763.93-e.9)

THREE YEAR REINSPECTION

The next 3 year reinspection for this facility, Whiteriver Elementary School, is due in April, 2020. Reinspection should be planned for March, 2020.

PERIODIC SURVEILLANCE

Periodic surveillance is planned to take place approximately every six months. The next period surveillance is due in October, 2017.

OPERATION AND MAINTENANCE PLAN

Retain this original Management Plan, with all records of activities which occur at this facility in this Management Plan in the administrative office. These activities include: minor and major abatements (if any); and any minor or major release incidents (with appropriate records) etc.

Records of maintenance / custodial personnel who have received required training at any time since July, 1989 should be retained in this Management Plan for ready reference.

Plans are to continue O & M as long as ACM remains at this facility.

NOTIFICATIONS (763.93)

In order to comply with sections 763.93 (e) (10) and (g) (4) of AHERA, workers and building occupants, as well as parents and legal guardians of the children, must be notified of activities such as building inspections/re-inspections and response actions connected with inspection findings. These same individuals should be notified of any post-response actions such as periodic re-inspections and surveillance activities and also results of actions taken subsequent to these activities.

At least once during each year, the local education agency shall notify in writing, parents, teachers, and employee organizations of the availability of the management plans. A dated copy of this notice must be retained in the plan.

A method of informing interested parties could be in the form of special P.T.O. meetings, public awareness seminars, or written notification. We recommend a combination of all of the above.
ANALYSIS OF BULK SAMPLES

All samples collected from this facility were processed in accordance with AHERA's Final Rule and Notice Part II Federal Register regarding ACM in schools (See EPA 40 CFR Part 763.86, 763.87 and 763.88 - Sampling, analysis and assessment.)

Analysis of samples taken during the initial AHERA building inspection dated May, 2014 was performed by EMC Labs, Inc. located at 9830 South 51st Street, Suite B-109, Phoenix, Arizona 85044, under NVLAP accreditation number 101926-0, using Polarized Light Microscopy (PLM) according to the EPA 600/R-93/116 method.
United States Department of Commerce
National Institute of Standards and Technology

NVLAP

Certificate of Accreditation to ISO/IEC 17025:2005

NVLAP LAB CODE: 101926-0

EMC Labs, Inc.
Phoenix, AZ

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

BULK ASBESTOS FIBER ANALYSIS

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

2013-07-01 through 2014-06-30
Effective dates

For the National Institute of Standards and Technology

NVLAP-01C (REV. 2009-01-28)
ASSURANCE OF ACCREDITATION

This is a statement of assurance that the people involved in this Management Plan for the facility, Maintenance, are full time employees of this firm. These employees have attended and successfully completed formal EPA-approved courses for AHERA Building Inspector and AHERA Management Planner as witnessed by the attached completion certificates.

Howard Lange
EMC², LLC
THE ASPENITOS INSTITUTE

Certifies that PATRICIA FRANCIS has attended the EPA approved course Building Inspector Refresher and successfully passed and completed the competency exam.

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

Issue Date: 14-Aug 2016
Expiration Date: 14-Aug 2017

Approved Instructor

20033 N. 19th Avenue, Building 6, Phoenix, AZ 85027
602-864-6564 - www.theasbestosinstitute.com
THE ASBESTOS INSTITUTE

Certifies that BENJAMIN JONES

has attended the EPA approved course
Management Planner Refresher

and successfully passed and completed
the competency exam.

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

Issue Date: 07-Dec 2016
Expiration Date: 07-Dec 2017

Approved Instructor
THE ASBESTOS INSTITUTE

Certifies that

Benjamin A Jones

has attended the EPA approved course

AHERA Refresher
Management Planner
October 4, 2013

and successfully passed the competency exam.

Date of Examination: October 4, 2013

Date of Expiration: October 4, 2014

William T. Cavness
Director

Approved Instructor

THE ASBESTOS INSTITUTE
20033 N. 19th Avenue
Building #6
Phoenix, AZ 85027
602-864-6564

This training meets all requirements for asbestos accreditation under TSCA Title II and California OSHA.
THE ASBESTOS INSTITUTE

Certifies that

Benjamin A Jones

has attended the EPA approved course

AHERA Refresher
Building Inspector
October 4, 2013

and successfully passed the competency exam.

Date of Examination: October 4, 2013
Date of Expiration: October 4, 2014

William T. Cavness
Director

Approved Instructor

THE ASBESTOS INSTITUTE
20033 N. 19th Avenue
Building #6
Phoenix, AZ 85027
602-864-6564

This training meets all requirements for asbestos accreditation under TSCA Title II and California OSHA.
RESOURCES TO BE USED FOR MANAGEMENT PLAN ACTIVITIES

Operations and Maintenance under this Management Plan will require the involvement of various resources depending on the specific activity involved. The following is a outline of and directions to appropriate Resources for the specific activity.

1. Response actions are of a magnitude that require qualified and certified personnel involvement.
   
   (a) A Certified Project Design Agent to prepare specifications for the Response Action selected by LEA.
   
   (b) Qualified, licensed Asbestos Abatement Contractor to comply with the specifications for the abatement. This includes permits, notifications, removal of asbestos under Controlled Conditions, proper disposal and all necessary documentation for inclusion in the LEA files.
   
   (c) Qualified air sampling laboratories to test air before and during abatement process and provide clean air testing using approved techniques with accompanying records.
   
   (d) LEA and the designated person shall be involved in the process of overseeing the initiation, contract activities, abatement and acceptance of completed Response Action.

2. Three (3) year reinspections must be completed by qualified, EPA certified Inspectors. This can be the LEA designated person, if qualified, or any Certified Inspector contracted by the LEA or designated person.

3. Periodic surveillance every 6 months may be conducted by maintenance/custodial staff qualified through the 16 hour training program. In the event qualified personnel do not exist, for what ever reason, the LEA designated person should be contacted so that arrangements can be made to complete the inspection, with qualified personnel, on a timely basis.

4. Training of maintenance/custodial staff must be by qualified personnel. The Principal shall insure that the LEA's designated person is advised as to new maintenance/custodial personnel that require 2 or 16 hour training within the 60 days of commencing employment. The Designated person will attempt to set up classes for groups when possible, or will identify separate classes that may be available. Personnel shall accordingly be trained within 60 days and certificates of completion shall be filed herein and with LEA (attn: designated person).
RESOURCES TO BE USED FOR MANAGEMENT PLAN ACTIVITIES

(Continued)

5. Maintenance activities that require the total of 16 hours of training for the maintenance/custodial personnel are as follows:

* Initial cleaning
* Additional cleaning
* Conducting operation and maintenance activities following disturbance of friable ACBM
* Maintenance activity of small-scale, short-term duration
* Minor fiber release episodes

Maintenance/custodial personnel who conduct these activities must also be medically qualified (Physical) to wear a respirator, have respirator training and be in a medical surveillance program.

6. Major fiber release episodes and those other than small scale - short duration shall be responded to by qualified, 16 hour trained personnel. The area shall have restricted access, NO EXCEPTIONS, using barrier tape, signs, locked doors, etc. at all area entrances. Shut off all HVAC systems going to and coming from the affected area. Contact LEA designated person immediately. After the LEA designated person is alerted, actions similar to those outlined in item 1 above, will be followed.
DESIGNATED PERSON

The person designated by the Whiteriver Unified School District #20 to be the ASBESTOS COORDINATOR and ensure that the duties of the LEA under AHERA are carried out is:

Name (Print): John Sempert

Title (Print): CCM Senior Project Manager

Signature: _______________________________

Address: Whiteriver Unified School District #20
P.O. Box 190, 959 South Chief Avenue
Whiteriver, Arizona 85941

Telephone: (928) 637-3031

DESIGNATED PERSON SIGN-OFF

I, ______ John Sempert ______, as the person designated by the Whiteriver Unified School District #20, certify that the LEA has met or will meet all general local education agency responsibility under the Asbestos Hazard Emergency Response Act of 1986 and 40 CFR 763.84.

Furthermore, I certify that the LEA has used and will continue to use E.P.A. accredited Building Inspectors, Management Planners, Abatement Project Designers, and Asbestos Abatement Supervisors and Workers to meet the local education agencies responsibilities under the Asbestos Hazard Emergency Response Act of 1986 and 40 CFR 763.

Name (Print): John Sempert

Signature: _______________________________

Date: _________________________________
OPERATIONS & MAINTENANCE PROGRAM

Description of Operations & Maintenance (O & M) Program

The O & M Program is designed for the building environment and its unique needs with the staff, maintenance and visitor population in mind. This program includes work practices to (1) maintain ACM in good condition, (2) insure proper cleanup of asbestos fibers previously released, (3) prevent further release of asbestos fibers, and (4) monitor the condition of ACM.

This program also identifies actions required by qualified maintenance / custodial personnel to insure occupant awareness of asbestos containing material (ACM) and actions being taken to manage the asbestos condition and / or problem if a disturbance / release occurs. This occurs through proper training of maintenance / custodial personnel and knowledge of the designated person. It will identify the intensity of management and continued surveillance of the asbestos containing building material (ACBM) thereby establishing the intent to protect the health and environment for the occupants of these facilities.

Designation of Asbestos Coordinator

The Owner shall designate one member, preferably the lead member of the maintenance / custodial staff, to be trained in the "16 hour" Asbestos Awareness Program" and then to be the Asbestos Coordinator for the facility. This person shall work with the Owner to initiate required actions and follow up actions required under this O&M program. This person should also review all "work control / permits" to insure that ACBM is not inadvertently disturbed.

Notification

Notification to building occupants and other affected individuals is required, under OSHA regulations, due to the presence of ACM being verified in this facility. The notification and warning serves several purposes:

1) To inform building occupants of the presence and location of ACM;
2) The need to avoid disturbing the ACM even though the fiber levels are currently non-injurious;
3) What is being done to deal with the material and to prevent release from the material.

Even though there are many ways to notify individuals who occupy or visit these facilities, the most common are:

1) distributing notices or letters;
2) conducting awareness / informational seminars;

Notices should state that this facility currently contains asbestos containing building materials (ACBM) and that as changes are made to the ACBM content, affected personnel will be notified. The Inspection Report will be updated with all changes that occur. Recipients of this notice need to be assured that there is no need for concern and that every possible action and care is being taken to insure the health and environment of the occupants of these facilities. The main purpose of these notifications are awareness and precautions.
Asbestos Awareness Training

All full time or part time members of the maintenance and custodial staff who may work in buildings that contain ACBM must receive "Asbestos Awareness Training" in accordance with OSHA regulations. New maintenance / custodial personnel shall receive this training before any actions that might disturb asbestos occurs. The training requirements will develop an awareness of asbestos and will be site specific so that the person(s) will know where ACBM exists in this facility. The training program is as follows:

"Asbestos Awareness" - 2 hours

- What is asbestos
- Sources, forms and uses of asbestos
- Examples of ACM, site specific
- Visual identification of suspect ACM
- Hazard identification and reporting
- Asbestos exposure health effect
- Recognizing and responding to damage / deterioration / delamination
- Management Plan and Inspection Report
- Name, address and telephone number of designated person

Operation and Maintenance Training - 14 hours

Maintenance / custodial personnel who may conduct any activity that will result in the disturbance of ACBM shall receive an additional 14 hours (in addition to the 2 hours above) to qualify them in the handling of a disturbance or minor release while protecting themselves and other building occupants. A minimum of 1 person, preferably the lead custodian, should be the person to receive this additional training. More than one qualified person would be valuable for expeditious and responsive coverage of activities of this O&M program. The additional training consists of:

- Summary of EPA and OSHA regulations pertaining to asbestos
- Applicable State, Federal and Local laws
- Proper methods of handling ACBM
- Use of respiratory protection and other protective clothing;
- Good work habits when involved with disturbance / release / cleaning. (Includes respirator "Fit-test" and requirements of medical examination)
- Cleaning procedures in the area of ACM
- Use of glove bag removal of asbestos (within allowed parameters), and removal and safe disposal of asbestos debris and contaminated cleaning materials.
- Identification of site specific work areas containing ACBM
- Procedures for periodic surveillance of ACBM identified in the facility

Note: Contact the designated person for sources of the above training. This training can only be provided by qualified and certified personnel.
Asbestos Awareness Training  (Continued)

One of the most significant aspects of the O&M program is the proper understanding of problems and work practices that are vital to the success of this program. It is imperative to instill in the cleaning, maintenance and custodial staff that the disruption of ACM is to be avoided whenever possible. A "work control / permit system" must be put into effect immediately. (See separate paragraph on this subject). Anytime ACM is disturbed, a variety of materials, labeling, warning signs, barriers, vacuum, and cleaning equipment must be utilized to maintain the integrity and decontamination of an area.

It is the Owner's responsibility to inform any outside contractors (i.e. electrical, plumbing, construction, telephone etc.) that a facility / area, in which he / she will be working in has asbestos. Acquaint them of the location and any other pertinent information as to materials friability and make recommendations as to the use of protective respirators and garments, as necessary.

To protect the Owner and the facility, it is recommended that all short term, outside contractors be required to check-in at the facilities office before any work is completed. Provide a form which identifies the above information, have them read and sign the form as an acknowledgement of having been appropriately advised and accordingly waive any liability for entry into, and the work environment itself.

Labels and Signs

EPA and OSHA require specifically worded warning signs, that notify personnel of the hazard and indicate the type of protective equipment required be posted at all "routine maintenance areas". These are areas such as boiler rooms, HVAC rooms / closets, communication / telephone equipment rooms, pipe chases, etc. where contract workers or employees have the possibility of disturbing asbestos containing materials (ACM).

Most of the work completed by the staff is to repair damaged pipe insulation, remove less than 3 feet of pipe insulation or possible encapsulation. When this type of small scale project is being performed, a plastic sheet shall be hung inside the door to prevent fiber release to other areas. Warning signs must be posted at the entrance to the areas where asbestos clean up is being performed. Eating, drinking or smoking is not allowed in asbestos work areas.

Appropriate caution labels shall be affixed to all materials, scrap waste, debris or other products containing asbestos fibers or their containers.

Major removal projects require that caution signs be displayed at each location where airborne concentrations of asbestos fibers may exceed the permissible exposure concentration. Signs shall be posted at such a distance outside the work area that personnel can read the signs and take necessary precautions prior to entering the work area.

Warning signs should be used in conjunction with small renovations or repair areas when ACM will be disturbed. These signs need to be posted at the entrances and the perimeters of the project according to OSHA. It is in your best interest to consult your designated person prior to undertaking any small renovation or repair by staff maintenance / custodial trained and qualified person. There are specific minimal allowable parameters for the quantity of ACM that can be handled by staff personnel.
Record-Keeping

An effective Management Plan is keyed to a comprehensive record-keeping system.

In general, the record keeping system must track three types of data - data on the physical condition of the ACBM, actions taken on the ACBM, and the data associated with the personnel involved with the asbestos management program.

Complete documentation and maintenance of records can make future renovation in the facility easier. More importantly, they will be an excellent source of defense in the event of any legal liability action against the Owner or facility. The more thorough the documentation, the more defensible the actions taken. Further, poor or sloppy record keeping could imply callousness toward staff, building occupants and the public. Therefore, it is essential that the best possible records be kept.

A building is required, by EPA, to maintain an accurate set of records of all inspections, surveillance, reinspections, major and minor releases, "preventative measures", "response actions", "initial" and "additional cleaning", "O&M activity", and any major activity which identifies the actions taken.

The Inspection Report identifies the physical condition of the ACBM. Records regarding personnel involved include those of whom were trained, when the training occurred, to what extent, and by whom. The medical history and results of all physical / medical examinations of qualified personnel who are under the medical surveillance program must be meticulously maintained and recorded. This information will provide a ready reference and complete story to anyone who wishes to review the inspection report and your asbestos programs.

For each homogeneous area where all ACBM has been removed, records of such removal should be retained for as long as the building is owned.

For each "preventative measure" and "response action" taken for friable and non-friable ACBM and suspected ACBM assumed to be ACM, the complete activity document shall be retained.

Each time "cleaning" and / or "additional cleaning" is conducted, a report shall be written and filed. Reports shall include name of person performing cleaning, date of cleaning, location of cleaned and method used.

Each "operation and maintenance activity" performed requires that a report indicating name of person, start and completion date, location of activity, description of activity, description of "preventative measures" if ACBM is removed, and the name and location of storage or disposal site of ACM.

Each major asbestos activity requires the involvement of a qualified contractor. The complete activity document developed by the contractor shall be filed and retained.

For each minor fiber release episode a report of the action shall be prepared which shall include information required under "O&M activity" above. Periodic surveillance inspection reports verifying condition or change of condition of ACBM materials must be retained and filed.
Record-Keeping  (Continued)

A record shall be established for each maintenance / custodial person receiving the 2 hour awareness training, also for each receiving the 2 hour plus 14 hour asbestos training. The record shall identify - the persons name, job title, social security number, date of training, location of training and number of hours completed. This record and the certificate of training should be retained in both sets of records for a period of at least thirty (30) years.

All records of Medical History, annual medical examinations, X-rays and termination medical examination, for each qualified staff personnel who works with asbestos (ACM) and uses a negative pressure respirator shall be retained for thirty (30) years after termination of employment, in both sets of records.

Worker Protection Program

Although maintenance and custodial personnel may not encounter asbestos fiber levels that exceed OSHA and EPA permissible exposure limit (PEL) (0.1 fibers/cc) during regular maintenance procedures, it is entirely possible that in the process of repairs, renovation, replacement of fixtures, working in "routine maintenance areas" such as boiler rooms, HVAC rooms etc. release of fibers can be encountered such that the airborne fibers could well exceed the PEL.

It is during these episodes that a qualified "16 hour trained" custodian will be required to be outfitted with special worker protection equipment and garments. This special equipment is in the form of negative pressure respirators (approved specifically for use in an environment with fiber counts above referenced value) to protect against fiber inhalation. The protective garments consist of disposable coveralls with integral head gear and surgical type disposable gloves to eliminate the probability of inadvertently carrying / transporting asbestos fibers from the controlled work area to other building occupants, spaces, or his / her home.

According to regulations, the Owner is required to provide maintenance personnel, who are expected to work in an asbestos fiber environment, with appropriately sized protective equipment. This includes approved respirators, with a "Fit-Test" if negative pressure, disposable gloves, outer garments and safety glasses.

Only those individuals who are medically capable to wear respirator protective equipment are to be issued this equipment. Before being issued a respirator, an employee must receive and complete a comprehensive medical evaluation.
Medical Surveillance Program

In accordance with OSHA regulations, if there are any employees / personnel that are required to or will have to wear a negative pressure respirators, a Medical Surveillance Program will be required. The maintenance / custodian personnel who have had the "16 hour" training, a "respirator Fit-Test", and are required by their employer to work in an asbestos fiber environment with fiber count equal to or greater than the PEL must, by mandate, be included in this program.

An acceptable medical surveillance program must include pre-placement, annual and termination examinations.

The comprehensive medical evaluation includes as a minimum, a medical history to determine existing conditions of any respiratory diseases, a chest X-ray, and pulmonary function tests.

Under this program the employer must provide, at their expense the comprehensive evaluation and annual evaluations of the same type. This is so the physician can compare the annual examinations with the initial pre-placement evaluations to determine if there were any changes in an employee's health status. Any noticeable changes require that the employer and the employee review the conditions and determine the appropriate action to undergo - the discontinuance of respirator activities etc.

Upon completion of each medical evaluation, the physician should be requested to provide - a written opinion stating whether or not the employee has any detectable medical conditions that might place him at increased risk; any limitations that the employee may have in the use of a respirator; and a statement that the employee has been informed by the physician of the results of his medical examination. A copy of the physician's written statement should be provided to the employee, by the Owner, within 30 days of receipt.

It is the Owner's responsibility to provide the physician with the following information -

- a copy of the OSHA asbestos standards (if he does not have one).
- a description of the employee's duties as they relate to asbestos
- the actual or anticipated level of exposure to asbestos fiber
- a description of the personal protective and respiratory equipment that the employee will be utilizing

To insure a complete set of medical records for each employee, the company is also directed to complete a termination medical evaluation. This and all prior evaluations / medical records must be retained for at least 30 years.
Periodic Surveillance

A systematic plan for surveillance of this facility must be carefully followed by the Owner to comply with the Asbestos Model Accreditation Plan and OSHA regulations to be in continual cognizance of the condition of all identified ACBM or assumed ACBM.

This plan includes:

During normal activities or every 6 months, the facility should have an inspection of the condition of all identified ACBM or assumed ACBM, as identified in the Inspection Report.

The person performing this periodic surveillance shall visually inspect all areas that are identified in the Inspection Report as ACBM or assumed ACBM. Reports shall be made of these surveillance including -- date of surveillance, name of inspector, and any changes in condition of the materials throughout the facility.

This inspection can be made by a qualified "16 hour" trained maintenance / custodial person who has record of such training filed herein.

The inspector shall inspect each area of the facility building and shall:
- Visually reinspect, and reassess the condition of all friable known or assumed ACBM.
- By touching previously considered non-friable ACBM, determine whether it has become friable since the last inspection or reinspection.
- Identify any homogeneous areas with material that has become friable since the last inspection or reinspection.
- Assess the condition of the newly friable material that is already assumed to be ACBM, bulk samples may be taken and submitted for analysis.
- Identify the potential for damage for each of the materials determined to be present during these reinspections.
- Notify building occupants, staff, maintenance personnel and other applicable organizations regarding any significant changes in the status of the ACBM.

Initial Cleaning

Initial cleaning of a facility, where friable ACBM, damaged TSI ACM or friable suspected ACBM assumed to be ACM are present, is recommended.

It is required that the specially trained and properly equipped maintenance / custodial personnel, with "16 hour" training, conduct this initial cleaning of targeted areas as soon as the program is in place and before the initiation of any Response Action(s).

Any method that might possibly re-suspend asbestos fibers into the air is to be avoided. Therefore, it is critical that specialized cleaning procedures are implemented.

Half-face negative pressure respirators are the minimum protection to be used by personnel. Any other type of approved respirator (PAPR, Full face) that has an equal or greater protection factor is also satisfactory.
Initial Cleaning (Continued)

Thorough cleaning must be completed by wet mopping the floors and wet washing walls with a damp cloth. A combination of wet mopping, wiping and vacuuming should be used to clean all surfaces within a building including any irregular surfaces such as curtains, books, shelving, furniture and attachments. Carpeting should be cleaned using equipment such as steam cleansers etc. Cleaning with mops, dust cloths, rags necessitate that they be wetted with "amended" water. "Amended" water is a mixture of water and a non-sudsing surfactant or wetting agent. A dust suppressant may also be used on mops. Cleaning mops, waste water, and clothes must be treated as asbestos contaminated and accordingly must be disposed of in appropriately marked, leak proof, sealable, 6 mil plastic bags or barrels.

Additional Cleaning

Additional cleaning may be necessary in certain areas. This may be where a material is deteriorating, a high exposure area, or mechanical rooms where there is constant vibration.

Routine Cleaning

Regular, periodic and routine cleaning is required for this facility. It is imperative that disruption of asbestos fibers be avoided. Personnel should avoid touching or otherwise contacting any ceilings or walls that are covered with friable asbestos materials. Maintenance personnel and staff must be aware of these ACM locations.

Improper cleaning can stir asbestos fibers. To prevent this type of contamination, the following procedures should be followed:

- Trained maintenance / custodial personnel should only be used for this activity
- Dust with damp cloth. DO NOT dust with brushes or dry cloths
- Wet mop all floors. DO NOT dry sweep floors. Use treated dust mops for non-friable flooring on a daily basis
- Avoid touching or contacting ceilings or walls that are covered with friable asbestos materials. DO NOT brush / sweep or paint ceilings or walls covered with asbestos materials
- DO NOT remove ventilation system filters dry; mist with water.
- DO NOT shake ventilation system filters, or blow them out with air for cleaning; dispose of filters in 6 mil, properly marked, plastic, seal tight, leak proof bags.
- Extreme caution must be exercised in the process of stripping and cleaning of vinyl asbestos tile (VAT) so as not to cause fiber release.

In the event any of the cleaning personnel encounter or identify asbestos debris during routine assignment they shall report the presence of the debris to the asbestos coordinator who shall:

- Immediately remove occupants / visitors / staff from the area
- Cordon off and secure the contaminated area
- Spray / mist water on any debris found near damaged ACM
- Advise the designated person of the incident
Routine Cleaning  (Continued)

- Clean up the debris using approved techniques and place in two labeled 6 mil plastic bag. Labels shall clearly state - CAUTION: * ASBESTOS CONTAINING MATERIALS * DISPOSE OF PROPERLY
- Vacuum asbestos debris using HEPA vacuum machine for all carpet, furniture, drapes, books, etc. DO NOT use standard vacuum for this debris.
- Wet wipe or wet mop all flat surface and floors
- Dispose of all filters, mop heads, wiping cloths, etc. in two six mil disposable plastic bags as referred to above.

General Maintenance

It is very important to caution staff to exercise extreme care when performing routine maintenance jobs around asbestos materials. A "Work Control / Permit System" should be set up and used to insure that everyone is aware and that every caution is taken during any activity that will disturb asbestos fibers. Qualified personnel shall follow the "Procedures of Activities Disturbing Friable ACBM" section presented later in this O&M Plan.

Work Control / Permit System

A "Work Control / Permit System" shall be initiated and placed under the responsibility of the designated person as a method of controlling the intentional or inadvertent disruption of ACM during routine daily maintenance or any renovations.

All work requests that involve renovations, modifications, applying of fixtures, brackets, hanging devices, mounting or otherwise affixing of appurtenances to building parts/structures, and system repairs/modifications that could by any remote possibility cause disturbance to any identified or assumed friable or non-friable ACBM, shall be submitted for approval through this system. This will help insure against any disturbance, controlled or otherwise.

The designated person shall be required to review all work requests to identify any potential for asbestos disturbance. In the event such disturbance is possible and is within the activity parameters of the Owner's qualified "16 hour" personnel, the request may be approved. All procedures outlined and described under "Procedures for Activities Disturbing Friable ACBM" section of this O&M plan must be followed.

In the event that the disturbance exceeds the activity parameters of the staff personnel, a certified, licensed asbestos abatement contractor may have to be contacted. In no instance shall work proceed without approval from the designated person.
Work Practice / Procedures

The work practices discussed in this plan are intended to review the types of routine tasks that the maintenance / custodial staff are expected to encounter. The activities suggested under various situations or types of materials are intended to be those that most specifically apply.

However, it must be understood that all of the background information such as material identification, notification, training of asbestos awareness, labels and signs, record keeping, worker protection etc. apply as a basis for all of these tasks and shall be complied with throughout the sequence of activities during the work procedures.

ACBM is categorized in accordance with EPA as follows:

- **Surfacing materials** which are sprayed on or trowel-applied materials
- **Thermal Systems Insulation (TSI)** such as equipment of HVAC type and pipe insulation
- **Miscellaneous ACBM** such as non-friable floor or ceiling tiles, tile mastic, putty, etc. (some of these can become friable).

The type of ACBM, condition, and quantity determine whether the work is within the scope of the maintenance / custodial personnel training and capabilities.

The practices and procedures reviewed are those that are to be used by qualified, trained personnel and "16 hour" personnel when protective equipment and garments are required. The size of the activity or incident is also a determinant as to the project being within the scope of the "16 hour" training and capabilities. Three (3) linear feet or less or three (3) square feet or less are the allowable parameters within the scope of training received. Any activity or incident that exceeds these parameters should be referred to the designated person after the necessary action to protect building occupants and disbursement of contamination has been completed.

Some Basic Procedures include:

- Use wet methods to reduce the release of asbestos - containing fibers. NEVER DRY SWEEP OR DRY DUST ASBESTOS CONTAINING MATERIALS;

- Use HEPA vacuum to clean up asbestos materials. NEVER USE A WET / DRY VACUUM OR A REGULAR VACUUM ON ASBESTOS MATERIALS;

- Wherever possible, have trained, qualified personnel use a containment system such as glove bag to further reduce the chances of fiber release;

- When small ACM areas must be disturbed, be sure wet methods are followed. Misting and covering the floor with 4 or 6 mil polyethylene sheeting will facilitate clean up. MAKE SURE ALL DEBRIS IS PROPERLY DISPOSED OF;

- Promptly bag all asbestos debris. Store in a covered, labeled container and keep containers in a locked, secured area until it is can be properly disposed of. ALL CLEAN UP PROCEDURES SHOULD BE PERFORMED BY QUALIFIED, TRAINED STAFF UTILIZING APPROVED TECHNIQUES AND RESPIRATORS.
Routine Work Practices

The maintenance and custodial staff is CAUTIONED against conducting any maintenance work in a manner that may disturb ACM. The staff must become familiar with the ACM materials and their locations in this facility through continued reference to the Inspection Report. (See the "Summary of ACBM")

Routine work practices should include:

- Avoid touching or disturbing asbestos materials on walls, ceilings, pipes, tanks, etc.
- Do not drill holes to hang objects from ceilings or walls that are covered with or contain asbestos materials
- Do not pin or hang materials on walls covered with or contain asbestos materials
- Do not sand or dry strip asbestos floor tiles or asbestos mastic backing materials. Stripping of ACM floor tile shall be kept to an absolute minimum and then may only be performed cautiously under a wetted condition with a slow speed (170 to 190 rpm) machine with low abrasive pad and by qualified asbestos trained personnel.
- Mastic may be removed under wetted condition only.
- Avoid disturbing asbestos materials while changing light bulbs or ballast in fixtures.
- Do not install drapes, curtains or dividers that may rub, disturb or damage ACM.

Procedures for Miscellaneous ACBM

This type of ACM is normally hard and non-friable; however, fibers can be released when they are worked on, i.e. cutting, drilling, sanding, etc. or if they are damaged. Maintenance and custodial personnel shall:

- Know the exact location of these materials
- Notify short term contractors of the location of ACM prior to their starting any work. Assure that these contractors acknowledge the presence of ACM by completing appropriate "acknowledgement and release" document.
- Ensure that only trained, qualified personnel handle work that involves ACM.
- Ensure that recommended work control documents are completed and approved and all handling procedures and safety precautions are followed before authorizing any repair or maintenance activity that will cause an asbestos release
- Avoid removing, sanding or stripping floor tiles containing asbestos. If tiles need to be removed, this shall be done under wetted condition only. If stripping is necessary, use procedures described above.
- Prepare necessary reports of activities and file per instructions herein.
**Procedures for Surfacing Materials**

ACM that is sprayed on or trowel-applied (Popcorn ceilings, fireproofing, etc.) on walls, decks, and ceilings is likely to be the main source of airborne asbestos fibers in buildings. If the material is friable, fibers can be released slowly as the material ages and deteriorates or cracks. **Disturbing friable material can result in large numbers of fibers being released. It is of the utmost importance that friable surfacing material not be disturbed.**

If there is a potential for material disturbance, the qualified, trained "16 hour" maintenance persons should:

- Wear appropriate protective respirator and clothing, including body suit, hood, boots and gloves
- Place a 4 or 6 mil vinyl drop sheet directly under the work area to collect any debris
- If surfacing material is above a suspended ceiling, the entry tiles should be removed carefully to minimize disturbance of ACM, thoroughly mist area above the tiles, HEPA vacuum as far as can be safely reached, complete work and then remove debris above and below ceiling with HEPA vacuum or wet wipes.
- Thoroughly HEPA vacuum all surfaces in the area including furniture, books, etc. if there is any evidence that there has been any disbursement of debris. Wet mop all floors. Carpeted areas should be HEPA vacuumed.
- Wet wipe all tools and ladders.
- Wet wipe vinyl drop sheet, fold and dispose of as asbestos waste
- Debris, cleaning cloths, mops, vacuum bags and filters should be disposed of as asbestos waste in sealed, leak tight plastic bags or containers properly labeled per regulations.
- Protective clothing should be vacuumed, removed and disposed of in plastic bags, as described above, prior to removal of respirator and leaving the work area.

**Work Practices in or near Air Plenums**

Work performed in a confined space that contains ACM can be hazardous to both the worker and the building occupants. Air plenums above suspended ceilings are of special concern because the disturbance of ACM and settled fibers can raise the levels of airborne fibers into the ventilated air and be distributed throughout the building. Any time ceiling panels are removed, the following precautions shall be followed:

- The air handling system should be temporarily shut off to prevent any distribution of fibers from the work site to other areas of the building;
- Doors should be securely fastened and signs posted to prevent unauthorized access into the work area.
Procedures for Thermal System Insulation (TSI)

Asbestos containing thermal system insulation (pipe, boiler, duct insulation) is typically a less significant source of airborne asbestos material, unless damaged, protective jackets around such insulation prevent fiber release. If the protective jacket is removed for repair purposes or the jacket is damaged, ACM insulation can be extremely friable. Precautions must be practiced prior to commencing any small repairs or removals that are within the 3 linear feet / 3 square feet allowable parameters of the qualified, trained "16 hour" person.

Qualified trained personnel should:

- Be knowledgeable as to the exact location of all TSI
- Apply appropriate labeling, cautioning of the presence of ACM, to inform building occupants and other maintenance personnel.
- Notify short term contractors of the location of ACM prior to their starting any work. Have their acknowledgement confirmed by completing the "acknowledgement and release" document. Retain in files.
- Wear appropriate respirator and protective disposable clothing during periodic cleaning or when cleaning after TSI has been damaged or repairs have been made.
- Ensure that proper techniques are used when repairs are being made with "glove bag". Proper protective equipment and clothing shall be worn.
- Clean the contaminated area using procedures outlined under "Procedures for Surfacing Materials" and follow waste / debris etc. disposition as detailed therein.
- Receive reports of any TSI damage or asbestos release from all maintenance personnel. The designated person should be informed immediately of damage. All clean up should be coordinated through the designated person.
- Prepare a complete report of all activities including cause, response, etc. Submit to the designated person for the record purposes.
Operation and Maintenance Activities

Procedures for Activities Disturbing Friable ACBM

- Work Control / Permit shall be submitted and approved by asbestos coordinator
- The planned activity by qualified, trained maintenance and / or custodial personnel cannot disturb ACBM in an area greater than 3 sf or 3 lf. In excess of these quantities, a qualified contractor is required. Contact your designated person.
- Restrict entry into the work area to only those necessary to perform the maintenance project by physically isolating the area or scheduling the activity in an "off" hour.
- Post appropriate signs, barrier tape, etc. to prevent unauthorized persons from entering.
- Shut off or temporarily modify air handling system and restrict other sources of air movement to minimized asbestos fiber dispersed.
- Use appropriate work practices or other controls, such as wet methods, protective clothing, HEPA vacuum, mini-enclosures, or glove bags as necessary to inhibit spread of any released fibers.
- Wet clean all fixtures or other components, tools, etc. in the immediate work area, upon completion of the necessary disturbance.
- Place all asbestos debris and all cleaning materials, protective clothing, filters, glove bags, etc. in sealed, leak tight, labeled plastic bags (double) or container depending on the volume.
- Prepare a report of the activity including the following:
  * Date started / Date completed
  * Project Activity Title
  * Work Control / Permit Number (also attach copy)
  * Location (Reference room / building). Include specific dimensions in feet i.e. north, south, east, west from a selected and designated point of reference.
  * Description of work completed
  * Protective garments and equipment used
  * Clean-up procedure and materials used
  * Disposition of asbestos material or contaminated cleaning materials
  * Who did the actual work (Name and signature -- and date signed).
  * Who inspected the work upon completion and verifies this report (Name, signature, and date signed.)

File a copy of this report in your Inspection Report in the Designated Person’s office.
Maintenance Activity OTHER than Small Scale, Short Duration

The extent of a maintenance or repair must be determined prior to any activity. The size of the project will determine whether the repairs are within the scope of the qualified, trained maintenance / custodial personnel.

Small, short duration activities include tasks such as, but not limited to (per 40 CFR Appendix B to Subpart E).

- Removal of asbestos-containing insulation in pipes (3 lineal feet).
- Removal of small quantities of asbestos-containing insulation on beams or above ceilings (3 square feet)
- Replacement of an asbestos-containing gasket on a valve or handhold cover.
- Installation or removal of small section of drywall (3 square feet)
- Installation of electrical conduit(s) through or around ACM (affecting 3 square feet or less in area).

If you are unsure as to your activity being within these defined parameters, contact your designated person for determination.

For activities disturbing friable ACBM greater than the above parameters, contact your designated person who will identify options or required actions.

Minor Fiber Release Episodes

The minor release episode is defined as the falling or dislodging of 3 square feet or 3 lineal feet or less of friable material. If the release exceeds these parameters, it is considered a major release, and you need to contact your designated person.

If minor, ensure that the following procedures are complied with:

- Restrict entry into the area and post the area
- Use proper respiratory protection
- Thoroughly saturate the debris using wet methods
- Thoroughly clean the area; remove the debris, wipe and mop the area, as necessary, to pick up dislodged and disbursed fibers
- Place the asbestos debris, cleaning materials, mops, etc. in sealed, leak-tight plastic bags or container designated (marked) as asbestos material
- Repair the area of damaged ACM to prevent further release of fibers
- Advise your designated person of activity and status / condition of repair. A condition may exist that warrants further response actions. This should be identified by a qualified, certified inspector or your designated person.
- Prepare a report of this action, including information detailed in report requirement under "Procedures for Activities Disturbing Friable ACBM".
Major Fiber Release Episode

This release exceeds the 3 square feet / 3 lineal feet parameters of a minor release; accordingly, the following procedures need be complied with:

- Restrict entry into the area by cordonning off or locking the building or room as required. Post signs to prevent entry by other than personnel necessary to perform the "response action".
- "Response Action" - a method including removal, encapsulation, enclosure repair, operations, and maintenance that protects human health and environment from friable ACBM.
- Shut off or temporarily modify the air-handling system to prevent distribution of asbestos fibers to other areas of the building.
- In the event of a release caused by fire, shut off the electrical power supply to that building or room, if possible. Consideration must be given to electrical "short circuits" effecting facility integrity vs. continued facility operation.
- Contact your designated person so that an inspection can be made to expedite a definition of ensuing response action. Arrangements will be made via the designated person to obtain the services of an accredited project designer to recommend "response action" options.
- The Owner and / or designated person shall select the "response action" deemed to best meet the objectives of protection of health of building occupants and the overall economic resources.
- The appropriate "response action" will be designed by the selected project designer.
- A qualified asbestos contractor will complete the "response action."

Disposal of Asbestos Waste and Contaminated Materials

Storage and disposal shall be conducted in the following manner:

- All ACM properly sealed in 2 - 6 mil poly bags or 1 - 6 mil bag sealed in a drum.
- All containers stored in a designated area.
- Designated storage area should have the following qualifications:

  * Only accessible to trained personnel
  * Area sufficient to hold the amount of containers.
  * Keep record of number of containers in storage and keep designated person informed of amount periodically.
  * When storage area is near capacity, contact designated person and a solution will be determined of where to transfer containers.
  * Upon transfer of containers, a chain of custody must be included with transfer from the site.
Asbestos Maintenance Kit

To expeditiously respond to a planned disturbance, small-scale short duration, minor or major release, it is important that the facility be equipped with necessary tools, wetting agents, sprayers, protective clothing, glove bags, disposable towels, printed disposal plastic bags, polyethylene sheeting, safety goggles, barrier tape, asbestos labels and signs, respirator(s) and filters, and repair materials that are properly organized and identified as an "ASBESTOS MAINTENANCE KIT". This kit should be readily accessible for the maintenance / custodian personnel who are trained and qualified to work in the asbestos activity area.

NOTE: Each person qualified to provide asbestos maintenance must have his / her own personal respirator which he / she shall be responsible to maintain in good working condition and proper fit condition.

For availability and content of this type of kit, contact the designated person.

Summary of IMPORTANCE of Management Plan as a TOOL

The Inspection report and all activities dealing with the ACM is the Owner's responsibility. This document is intended to be your tool for identifying asbestos problem areas and to direct you in how to operate your facilities and maintain them in the best interest of protecting the health of your staff and visitors.

This Plan, with its present contents, is just the foundation for a continuing, on-going record of how your facility's asbestos content and status changes.

Any time any activity is accomplished or occurs, by accident or design, a report of the incident and completed action must be prepared and filed herein. This becomes your substantiation, when activity is properly conducted and recorded, that the Owner and you are doing everything possible to protect the health of the building occupants, staff, and visiting public.

At any time, the Federal Regulatory Agencies can review these records and determine whether or not you are in compliance and doing what MUST be done.