

July 19, 2021

Mr. Kenneth Weston
Oak Point Associates
231 Main Street
Biddeford, ME 04005

Re: Pierce Island Pump/Bath House
Building Survey Findings
RPF File No. 21.0482

Dear Mr. Weston,

On April 13, 2021, RPF Environmental, Inc. (RPF) conducted a survey at the Pierce Island Pump House and Bath House located at 99 Pierce Island Road, in Portsmouth, NH. The survey was performed in the building, as designated by you or your site representative, for accessible hazardous building material, as indicated herein. Below is a summary of findings, discussion of the results and preliminary recommendations for proper management of the identified hazardous building material. Attached to this report are the survey data tables, laboratory results, survey methodologies and limitations.

This report is not intended to be used as an abatement specification or work plan. To proceed with abatement work, the following important steps are necessary:

1. A work plan or project design documents must be prepared prior to abatement by a certified abatement project designer.
2. The abatement specification or work plan should then be used to solicit bids from qualified abatement contractors. Only properly licensed contractors should be used for asbestos abatement and disposal.
3. A qualified industrial hygiene/testing consultant should conduct sufficient testing and inspections of the work, independent of the abatement contractor. The consultant should also prepare final abatement reports for the work.

Summary of Findings

The Pierce Island Bath House is a single-story concrete structure that houses both a men's and women's changing room as well as a snack bar area. The Pump House is located behind the Bath House and is a single story concrete structure.

The scope of the survey included accessible asbestos-containing building material (ACBM) in accordance with the initial asbestos inspection requirements prior to renovation or demolition work as stated in the State regulations and applicable federal regulations. In addition, the survey included screening for lead paint (LP), polychlorinated biphenyls (PCB) light ballasts, PCB caulking,

mercury switches, cathode ray tubes, refrigerants, building system hydraulics, and fluorescent light bulbs.

Asbestos

Several types of suspect ACM were observed by RPF, including friable and nonfriable suspect material. Based on the testing performed by RPF, asbestos was detected in the light gray wall patching material observed on walls throughout the Bath House. No asbestos was detected in the material samples collected from the Pump House.

Lead Paint

Based on the year of construction and extent of renovation conducted over the years, it is reasonable to assume that some lead paint (LP) is present. RPF conducted limited spot testing of paint and LP was confirmed to be present on various interior and exterior building components. The intent of the lead testing was for potential lead hazardous waste disposal screening purposes only.

Visual Observations of Suspect PCB Caulk

Based on the RPF visual observations, suspect PCB caulk was not observed.

Visual Observations of Polychlorinated Biphenyls, Mercury, Refrigerants, Batteries, Building System Hydraulics, and Fire Escape Signs

Based on the RPF visual observations fluorescent light bulbs are present throughout both of the buildings along with potential PCB containing ballasts. The Bath House also has several components that contain refrigerants. Mercury containing switches, batteries, and building systems hydraulics were not observed at the time of the surveys.

Depending on the extent of renovation and final construction plans, proper abatement and/or management of the materials will be required in accordance with applicable State and federal regulations. Renovation and demolition plans should be reviewed by a certified industrial hygienist and a licensed project designer for possible asbestos impact issues. Based on the impact assessment and planned usage, technical specifications should be prepared for abatement, as applicable. A management plan should also be prepared to address any asbestos or other hazardous material scheduled to remain after construction.

Discussion of Findings

Asbestos-Containing Building Material

Asbestos is the name for a group of naturally occurring minerals that separate into strong, very fine fibers. The adverse health effects associated with asbestos exposure have been extensively studied for many years. Results of these studies and epidemiological investigations have

demonstrated that inhalation of asbestos fibers may lead to increased risk of developing one or more diseases. In all cases, extreme care must be used not to disturb asbestos-containing materials or to create fiber release episodes.

In the accessible locations surveyed, RPF identified eighteen (18) homogeneous groups of accessible suspect asbestos-containing building material between the two buildings. Suspect materials were identified based on current industry standards, EPA, and other guideline listings of potential suspect ACM.

The following is a summary list of the suspect ACM identified and sampled in the buildings during this survey:

Bath House

- Tan Peel and Stick Tile with Black Adhesive
- Tan Tub Glue
- White Window Caulk
- Light Gray Patching Material
- Tan Patching Material
- White Window Glaze
- Foam Insulation
- Black Built Up Asphalt
- Black Flashing Caulk
- Black Pipe Sealant

Pump House

- Red Gasket
- Black Gasket
- Black Seam Sealant
- Brown Fiberboard
- Tan Patching Material
- Dark Gray Patching Material
- Black Rubber
- Black Rolled Asphalt

A total of forty-two (42) samples were extracted from the different groups of suspect material in accordance with EPA sampling protocols. Of the samples collected by RPF, asbestos was detected in one group of suspect ACM light gray patching material in the Bath House.

Table 1 below includes a list of ACM identified in the Bath House, EPA category listings, and asbestos content. A listing of the different homogenous groups of suspect material identified in both buildings, samples collected, and analytical results is included in Table 2 of Appendix A.

**TABLE 1
 SUMMARY OF ACM IDENTIFIED**

Building Material	Location	Approximate Quantity	EPA Category	Asbestos Results
Light Gray Patching Material	Bath House – small patches on cement walls throughout building	6 sq. ft.	Category II Nonfriable	3% Chrysotile

The ACBM identified during this survey consists of nonfriable material which was observed to be in good to fair condition and, left undisturbed and properly managed, is unlikely to cause any major fiber release episodes.

At the time of the surveys the upper roof of the pump house was inaccessible, however judging by visual observations it appeared to be similar to the lower roof of the pump house, where samples were collected from.

Suspect materials encountered at the site subsequent to this survey, which are not included on the enclosed listings of suspect material sampled, should be assumed to be ACBM until proper testing proves otherwise (for example prior to any disturbance due to maintenance, renovation or demolition activity). Please notify RPF in this event to arrange for proper testing and assessments. Please reference the attached methodology and limitations.

Lead Paint Screening

For the purposes of this survey, RPF performed screening for lead in paint using a Niton X-Ray Fluorescence (XRF) Meter of various interior and exterior painted surfaces. The results of this lead screening are included at Table 3 of Appendix A. The results of this testing showed lead concentrations in various interior and exterior painted surfaces at levels ranging from 0.01 to 0.30 milligrams per square centimeter (mg/cm^2). The intent of the lead testing was for potential lead hazardous waste disposal screening purposes only.

Based on this limited testing, it should be assumed that other painted surfaces at the site may also contain lead.

In addition, based on the type and age of building construction, it is reasonable to assume that various painted surfaces contain some lead. It is not uncommon in buildings such as this and that have had various renovation and upgrades to have both lead containing paint and non-lead containing paint. Lead is a toxic metal that was used for many years in paint and other products found in and around buildings and homes. Exposure to lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Children six years old and under are most at risk; however, adults are also susceptible to the effects of lead over exposure.

Current State of New Hampshire Lead Poisoning regulations consider any paint that contains greater than $1.0 \text{ mg}/\text{cm}^2$ to be lead-based paint. However, the intent of this survey was for construction purposes only and preliminary demolition waste stream implications, not for compliance with State, HUD, or any regulatory abatement order.

Any surfaces with lead present should be managed in accordance with current rules and guidelines, including but not limited to OSHA worker safety rules and State and EPA waste handling and disposal regulations. U.S. Occupational Safety and Health Administration (OSHA) construction rules do not specify any "safe" or acceptable levels of lead within paint for the purposes of occupational exposures. Therefore, construction work involving paint found to contain lead must be completed in accordance with OSHA regulations, not limited to the lead standard, 29 CFR 1926.62. Contractors completing work in areas found to contain lead, or where it is reasonable to

assume lead may be present, should be notified of the presence (and potential presence) of lead and proper work protocols should be used.

As lead was found to be present in the screening, proper waste testing with TCLP extraction for lead and potentially other toxic materials should also be completed prior to disposal of any waste generated in accordance with current EPA requirements. Often times it is recommended that pre-demolition TCLP testing be completed such that waste can be segregated as required during demolition activity. Construction/demolition waste that is found to contain lead greater or equal to 5.0 milligrams per liter (mg/L) by TCLP analysis must be handled and treated as hazardous waste.

Please also note that construction and renovation work involving lead paint in housing and child-occupied facilities built before 1978 is also regulated under the EPA Renovation, Repair, and Painting (RRP) rule. Any contractors conducting such work must be properly certified and must use lead safe work methods pursuant to the EPA RRP rule. In addition, pursuant to Title X requirements landlords and sellers are required to disclose the results of lead inspections to tenants and purchasers, and to provide the warning notice and pamphlets in accordance with Title X and State requirements.

Fluorescent Lamps, PCB Light Ballasts, Batteries, Refrigerants, Building System Hydraulics, and Mercury Switches

PCB or assumed PCB ballasts were observed by RPF throughout both of the buildings. For this survey, RPF inventoried representative fluorescent lamps throughout each building. The following table shows the inventory of fluorescent light bulbs, light fixture ballasts, batteries, refrigerants, building system hydraulics, and mercury switches throughout each building:

Summary of Visual Observations

Universal Waste	Approximate Quantities – Bath House	Approximate Quantities – Pump House
Fluorescent Bulbs	36	12
Light Ballasts	18	6
Batteries	0	0
Refrigerants	1	0
Building System Hydraulics	0	0
Mercury Switches	0	0

Fluorescent lamps contain a small quantity of mercury that may pose a hazard to human health or the environment if the materials are not managed properly. These bulbs, along with mercury switches (thermostats) should be segregated and properly disposed of during demolition.

During this survey, RPF was unable to open and check the fluorescent light ballasts as the buildings electrical systems were still energized. During demolition, additional inspections should be made to identify PCB versus non-PCB containing ballasts. Ballasts should be checked for a “PCB-Free”

or “No PCBs” label prior to disposal. PCB and non-PCB ballasts should be segregated and packaged for waste disposal in accordance with State and federal requirements. There is a substantial cost difference for disposal of PCB ballasts versus non-PCB ballasts.

PCBs have been shown to cause chronic toxic effects and are a human carcinogen. PCBs are toxic according to the U.S. EPA and are a regulated material. The two primary federal laws that affect the handling of PCBs are the Toxic Substance Control Act and the Superfund Law (CERCLA). Other regulations include various State requirements, Department of Transportation, U.S. OSHA, and the Resource Conservation and Recovery Act. The regulations establish various requirements for the removal, handling, storage and disposal of PCBs.

It should be noted that the Pierce Island Pump House is currently in use for the Pierce Island Pool. The pump house stores various chemicals, including a chlorinator for the pool.

With regard to light ballasts, approximately half were manufactured prior to 1979 and nearly all pre-1979 ballasts contain PCBs. Ballasts manufactured after July 1, 1978, and that do not contain PCBs are required to be clearly marked “No PCBs”. Please note that it is possible that post 1979 ballasts may contain some PCBs in the capacitor oils and more information should be requested if needed for applicable State and federal agencies. PCBs may also be present in common household appliances with small capacitors and as dielectric fluids; other electric equipment such as transformers, switches and voltage regulators; and recent studies have shown PCB content in caulk and some paints. Documentation of current conditions and in-depth hazard assessments, and laboratory testing for these other PCB usages, is beyond the scope-of-work for this initial survey.

PCB in Caulking

Based on RPF’s visual observations, RPF did not observe accessible suspect PCB caulk at the time of this limited survey.

PCB-containing caulk is considered PCB bulk product waste if the concentration of PCBs in the caulk is greater than or equal to (\geq) 50 ppm pursuant to 40 CFR § 761.3. PCB bulk product waste includes waste derived from manufactured products containing PCBs in a non-liquid state where the concentration at the time of designation for disposal is \geq 50 ppm PCBs.

Conclusions

Based on the survey findings, the Bath House building was found to contain ACBM. Both the Bath House and the Pump House were found to contain LP and other hazardous building material.

In accordance with current regulatory requirements, ACBM that may be impacted or disturbed (such that asbestos fiber release occurs) by renovation, demolition or other such activity must be removed by qualified, licensed firms. Although regulations for removal of nonfriable ACBM are somewhat less stringent than the requirements for friable ACBM, it should be noted that nonfriable ACBM that is subjected to grinding, abrasion, and other forces, could be rendered friable. In this event, the nonfriable ACBM would be re-categorized friable ACBM.

ACBM that will not be impacted by renovation or demolition activity may be left in place if managed properly and if the materials are maintained in good condition. ACBM to remain in the building should be included in an asbestos management plan and operations and maintenance (O&M) program detailing the measures to be used to safely occupy the building until the ACBM is fully removed. An accredited Management Planner should prepare the O&M Program in accordance with the guidelines set forth in 40 CFR Part 763 (AHERA).

Work impacting LP, fluorescent light bulbs, mercury and potential PCB ballasts must be performed in accordance with current State and federal standards, including but not limited safe work practices, engineering controls, proper waste packaging, and proper disposal. Work involving LP may require notification of tenants, if rented or leased space, prior to start of work.

Sufficiently in advance of the start of renovation and/or remediation work, abatement project design should be completed. As part the initial design steps any planned renovation and demolition activity should be reviewed for potential impact on ACBM. Asbestos removal is highly regulated at the State and federal level, and in some cases, at the local level also. Notification to NH Air Resources is required 10-days prior to the start of abatement work and demolition. Only qualified, trained, and licensed firms, as applicable, should be engaged to complete asbestos removal or other abatement activity. Asbestos abatement work must be designed (abatement specifications or work plan prepared) by accredited personnel.

All employees and contractors that may access or otherwise disturb areas with suspect ACBM present should be notified of the presence of ACBM and possible hidden ACBM, and the need to use caution when proceeding with work. Appropriate notifications, labeling and other hazard communications should be completed to all employees, contractors and others in accordance with US OSHA regulations and other applicable requirements (including asbestos labeling in accordance with 29 CFR Part 1926). The scope of RPF services for this survey did not include labeling of ACBM or hazard communications to other employees, building occupants, contractors, or subcontractors.

Documentation of current ACBM conditions and in-depth hazard assessment is beyond the scope-of-work for this initial survey. With the exception of the specific testing and analysis detailed herein, no other samples of materials, oil, water, ground water, air, or other suspect hazardous materials were collected in the course of this inspection that supports or denies these conclusions. No additional services beyond those explicitly stated herein were performed and none should be inferred or implied. The summary and conclusions are based on reasonably ascertainable information as described in this report. RPF Environmental, Inc. makes no guarantees, warranties, or references regarding this property or the condition of the property after the period of this report.

If you have any questions at this time, or if you would like to discuss the remediation process, please call our office.

Sincerely,
RPF ENVIRONMENTAL, INC.



Katherine Corey
EH&S Consultant
Licensed Asbestos Inspector

Enclosures:

- Appendix A: Data and Analytical Tables
- Appendix B: Example Pictures
- Appendix C: Site Sketch
- Appendix D: Summary of Methodology and Limitations

21.0482 Pierce Island Pump House 051721 Asb & Hazmat Report

APPENDIX A

TABLE 2

**OAK POINT ASSOCIATES
 99 Pierce Island Road, Portsmouth, NH
 Bath House and Pump House**

Polarized Light Microscopy – EPA 600/R-93/116 Method

Samples Collected: May 17, 2021

Sample ID	Description	Asbestos Content
051721-HG1a	Peel and Stick Tile and Adhesive, Tan/Clear, Bath House Countertop	None Detected
051721-HG1b	Peel and Stick Tile and Adhesive, Tan/Clear, Bath House Countertop	None Detected
051721-HG2a	Adhesive, Tan, Bath House Men's Bathroom, under shower surround	None Detected
051721-HG2b	Adhesive, Tan, Bath House Men's Bathroom, under shower surround	None Detected
051721-HG3a	Window Caulk, White, Bath House Southwest Wall in Snack Bar Area	None Detected
051721-HG3b	Window Caulk, White, Bath House Southwest Wall in Snack Bar Area	None Detected
051721-HG4a	Patching Material, Light Gray, Bath House Snack Bar Area	3% Chrysotile
051721-HG4b	Patching Material, Light Gray, Bath House Men's Changing Area Southeast Wall	*SFP
051721-HG4c	Patching Material, Light Gray, Bath House Women's Changing Area Northwest Wall	*SFP
051721-HG5a	Patching Material, Tan, Bath House Snack Bar Area	None Detected
051721-HG5b	Patching Material, Tan, Bath House Snack Bar Area	None Detected
051721-HG5c	Patching Material, Tan, Bath House Snack Bar Area	None Detected
051721-HG6a	Window Glaze, White, Bath House Northeast Exterior	None Detected
051721-HG6b	Window Glaze, White, Bath House Southwest Exterior	None Detected
051721-HG7a	Gasket, Red, Pump House	None Detected
051721-HG7b	Gasket, Red, Pump House	None Detected
051721-HG8a	Gasket, Black, Pump House	None Detected
051721-HG8b	Gasket, Black, Pump House	None Detected
051721-HG9a	Patching Material, Tan, Pump House	None Detected
051721-HG9b	Patching Material, Tan, Pump House	None Detected

Notes:

- SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.

TABLE 2

OAK POINT ASSOCIATES
99 Pierce Island Road, Portsmouth, NH
Bath House and Pump House

Polarized Light Microscopy – EPA 600/R-93/116 Method

Samples Collected: May 17, 2021

Sample ID	Description	Asbestos Content
051721-HG10a	Patching Material, Dark Gray, Pump House	None Detected
051721-HG10b	Patching Material, Dark Gray, Pump House	None Detected
051721-HG11a	Seam Sealant, Black, Pump House Lower Roof West Edge	None Detected
051721-HG11b	Seam Sealant, Black, Pump House Lower Roof West Edge	None Detected
051721-HG12a	Rubber, Black, Pump House, Lower Roof, Field, Approximate Center of Roof	None Detected
051721-HG12b	Rubber, Black, Pump House, Lower Roof, Edge, Southeast Corner of Roof	None Detected
051721-HG12c	Rubber, Black, Pump House, Lower Roof, Abutment, East Edge Along Wall	None Detected
051721-HG13a	Fiberboard, Brown, Pump House, Lower Roof, Edge, Southeast Corner of Roof	None Detected
051721-HG13b	Fiberboard, Brown, Pump House, Lower Roof, Field, Near Northwest Corner	None Detected
051721-HG13c	Fiberboard, Brown, Pump House, Lower Roof, Abutment, East Edge Along Wall	None Detected
051721-HG14a	Rolled Asphalt, Black, Pump House, Lower Roof, Field, Approximate Center of Roof	None Detected
051721-HG14b	Rolled Asphalt, Black, Pump House, Lower Roof, Field, Near Northwest Corner	None Detected
051721-HG14c	Rolled Asphalt, Black, Pump House, Lower Roof, Abutment, East Edge Along Wall	None Detected
052821-HG15a	Foam Insulation, White, Bath House Roof, Field, Approximate Center of Roof	None Detected
052821-HG15b	Foam Insulation, White, Bath House Roof, Edge, North Side	None Detected
052821-HG16a	Built Up Asphalt, Black, Bath House Roof, Field, Approximate Center of Roof	None Detected
052821-HG16b	Built Up Asphalt, Black, Bath House Roof, Field, Near South End	None Detected
052821-HG16c	Built Up Asphalt, Black, Bath House Roof, Edge, North Side	None Detected
052821-HG17a	Flashing Caulk, Black, Bath House Roof, Edge, West Side	None Detected
052821-HG17b	Flashing Caulk, Black, Bath House Roof, Edge, South Side	None Detected

Notes:

- SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.

TABLE 2

OAK POINT ASSOCIATES
99 Pierce Island Road, Portsmouth, NH
Bath House and Pump House

Polarized Light Microscopy – EPA 600/R-93/116 Method
Samples Collected: May 17, 2021

Sample ID	Description	Asbestos Content
052821-HG18a	Pipe Sealant, Black, Bath House Roof, Near Southwest Edge	None Detected
052821-HG18b	Pipe Sealant, Black, Bath House Roof, Near Southwest Edge	None Detected

RPF File 21.0482

Notes:

- SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.

TABLE 3

OAK POINT ASSOCIATES
99 Pierce Island Road, Portsmouth, NH
Bath House and Pump House

XRF TEST RESULTS

Sample Collected: May 17, 2021

Component	Substrate	Color	Location	Result (mg/cm ²)
Calibration	--	--	SRM 2573	1.0
Calibration	--	--	SRM 2573	1.1
Calibration	--	--	SRM 2573	1.1
Wall	Cement	Light Yellow	Bath House Exterior, West Wall	0.00
Shutters	Vinyl	Green	Bath House Exterior, West Side	0.00
Door Frame	Metal	White	Bath House Exterior, West Side	0.00
Drain Pipe	Metal	Light Yellow	Bath House Exterior, West Side	0.00
Window Frame	Cement	White	Bath House Exterior, South Side	0.01
Door	Wood	White	Bath House Exterior, North Side	0.00
Floor	Concrete	Dark Red	Bath House Exterior, East Side	0.01
Wall	Cement	Light Yellow	Bath House Exterior, East Side	0.01
Door	Wood	Light Blue	Bath House, Snack Shop	0.01
Floor	Concrete	Grey	Bath House, Snack Shop, Floor	0.00
Counter Trim	Wood	White	Bath House, Snack Shop, Floor	0.00
Stall Walls	Wood	Dark Green	Bath House, Women's Restroom	0.02
Floor	Concrete	Dark Red	Bath House, Women's Restroom	0.00
Wall	Cement	Light Yellow	Bath House, Women's Restroom	0.04
Column	Metal	Yellow	Bath House, Men's Restroom	0.20
Stall Walls	Metal	Green	Bath House, Men's Restroom	0.00
Door	Wood	White	Bath House, Men's Restroom	0.00
Floor	Concrete	Dark Red	Bath House, Men's Restroom	0.00
Wall	Concrete	Light Yellow	Pump House, Exterior Wall, West Side	0.00

**TABLE 3
(continued)**

**OAK POINT ASSOCIATES
99 Pierce Island Road, Portsmouth, NH
Bath House and Pump House**

XRF TEST RESULTS

Sample Collected: May 17, 2021

Component	Substrate	Color	Location	Result (mg/cm ²)
Door Frame	Metal	White	Pump House, Exterior Wall, West Side	0.00
Door Frame	Metal	Green	Pump House, Exterior Wall, West Side	0.00
Shelf	Wood	Grey	Pump House, West Room, Shelves	0.00
Board	Wood	Black	Pump House, Pump Room, Behind Electrical	0.00
Sand Filter	Metal	Pink	Pump House, Pump Room, Behind Electrical	0.30
Wall	Cement	Light Yellow	Pump House, Exterior, North Side	0.01
Wall	Cement	Light Yellow	Pump House, Exterior, South Side	0.00
Soffit	Wood	White	Pump House, Exterior, West Side	0.23
Calibration	--	--	SMR 2573	1.0
Calibration	--	--	SRM 2573	1.1
Calibration	--	--	SRM 2573	1.0

RPF Job Number: 21.0482

Notes:

- Lead based paint as defined by current state lead poisoning prevention regulations, is any paint that contains in excess of 1.0 mg/cm² of lead. OSHA does not currently establish a percent lead for lead paint.
- mg/cm² milligrams per centimeter square; cps means hertz measurement
- Please reference the full report for discussions and additional information and limitations pertaining to these results. This testing is not for State or HUD LBP inspection or risk assessment compliance.

APPENDIX B



1. Exterior view of the Pierce Island Bath House.



2. Snack Bar area in the Bath House. Two refrigerators visible behind the counter.



3. View of the lobby from behind the snack bar in the Bath House. ACBM patching material is located on the wall entering the women's changing area.



4. View of the roof of the Pierce Island Bath House.



5. View of the roof core sample on the Bath House roof.



6. Exterior view of the Pierce Island Pump House.

APPENDIX B: SITE PHOTOGRAPHS

Site Address:
99 Pierce Island Road
Portsmouth, NH



www.airpf.com
603-942-5432

Project No. 21.0482



7. Exterior view of the Pierce Island Pump House.



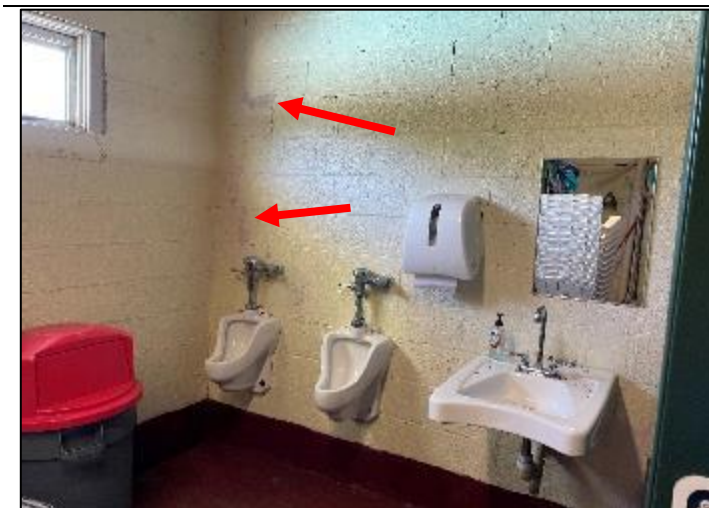
8. Interior view of the Pump House.



9. View of the upper roof of the Pump House.



10. View of the Pump House lower roof abutment.



11. Example of ACBM light gray patching material on wall in the Bath House men's bathroom.



12. View of Non-ACBM dark gray patching material on wall in Pump House.

APPENDIX B: SITE PHOTOGRAPHS

Site Address:
99 Pierce Island Road
Portsmouth, NH



www.airpf.com
603-942-5432

Project No. 21.0482

APPENDIX C

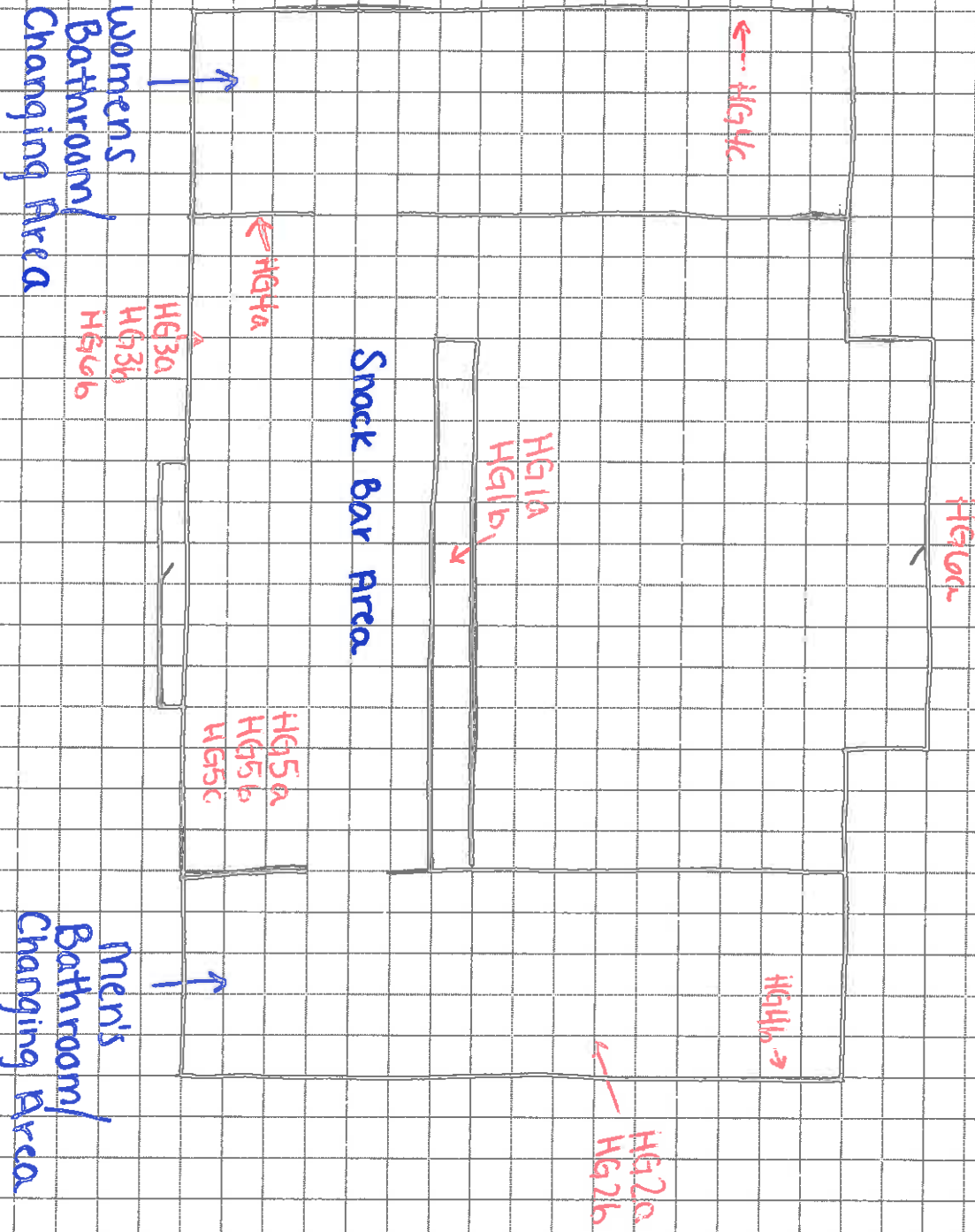
Project: Oak Point Assoc.

File No: 21.0482

Date: 5/17/21

Location: Bath House

Tech: KC



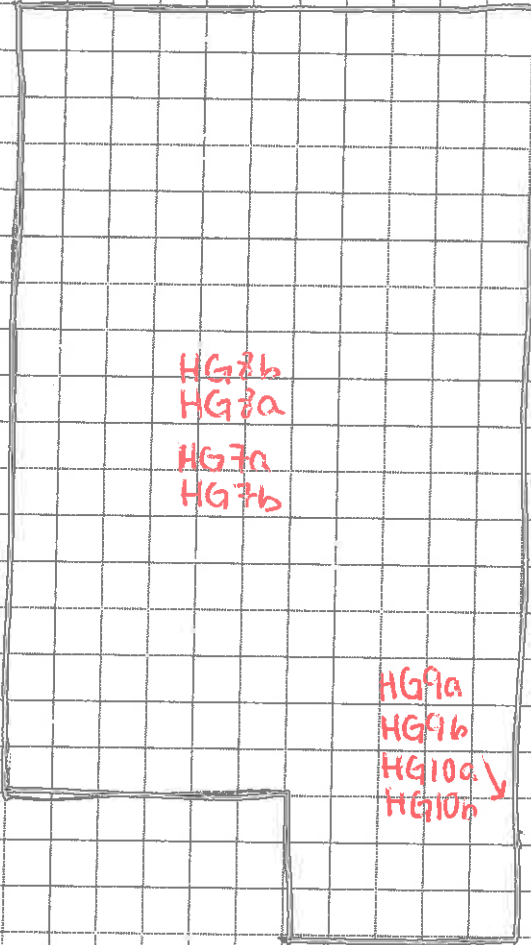
Project: Oak Point Assoc.

File No: 21.0482

Date: 5/17/21

Location: Pump House

Tech: KC



APPENDIX D

Summary of Methodology: Asbestos-Containing Building Materials Survey

EPA accredited inspector(s) surveyed accessible space in the building or site areas included within the RPF Scope of Work (SOW) to identify suspect asbestos-containing building material (ACBM). Suspect ACBM was inventoried and categorized into homogeneous groups of materials. To the extent indicated in the report, samples were then extracted from the different groups of homogeneous materials in accordance with applicable State and federal rules and regulations. For surveys in which the SOW included full inspections of the affect space, sampling methodologies were based on the requirements set forth in 40 CFR Part 763 (EPA) and 29 CFR Part 1926.1101 (OSHA). For preliminary or limited surveys, findings apply to only the affected material or space as indicated in the RPF SOW and Report and additional inspection and testing will be required to satisfy regulatory obligations associated with renovation, demolition, maintenance and other occupational safety and health requirements. Sampling methodologies used are as set forth in 40 CFR Part 763 (EPA):

- Surfacing Material: 3 bulk samples from each homogenous area and/or material that is 1,000 square feet or less. 5 bulk samples from each homogenous area that is greater than 1,000 square feet but less than or equal to 5000 square feet. 7 bulk samples from each homogenous area that is greater than 5,000 square feet.
- Thermal System Insulation: 3 bulk samples from each homogenous area. 1 bulk sample from each homogenous area of patched thermal system insulation if the patched section is less than 6 linear or square feet. Samples sufficient to determine whether the material is ACM from each insulated mechanical system where cement is utilized on tees, elbows, or valves.
- Miscellaneous ACM: 3 samples from each miscellaneous material. 1 sample if the amount of miscellaneous material is less than 6 square or linear feet.

Collected samples were individually placed into sealed containers, labeled, and submitted with proper chain of custody forms to the RPF NVLAP-accredited vendor laboratory. Sample containers and tools were cleaned after each sample was collected. Samples were analyzed for asbestos content using polarized light microscopy (PLM). Although PLM is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, PLM may not be sensitive enough to detect all of the asbestos fibers in certain types of materials, such as floor tile and other nonfriable ACBM. In the event that more definitive results are requested in cases of with negative or trace results of asbestos are detected, RPF recommends that confirmation testing be completed using transmission electron microscopy.

For each homogeneous group of suspect material, a “stop at first positive” (SFP) method may have been employed during the analysis. The SFP method is based on current EPA sampling protocols and means that if one sample within a homogeneous group of suspect material is found to contain >1% asbestos, then further analysis of that specific homogenous group samples is terminated and the entire homogeneous group of material is considered to be ACBM regardless of the other sample results. This is based on the potential for inconsistent mix of asbestos in the product yielding varying findings across the different individual samples collected from the same homogeneous group. Unless otherwise noted in the report, sample groups found to have 1% to <10% asbestos content are assumed to be ACBM; to rebut this assumption further analysis with point count methods are required.

Inaccessible and hidden areas, including but not limited to wall/floor/ceiling cavity space, space with obstructed access (such as fiberglass insulation above suspended ceilings), sub floors, interiors of mechanical and process equipment, and similar spaces were not included in the inspection and care should be used when accessing these areas in the future. Unless otherwise noted in the RPF Report, destructive survey techniques were not employed during this survey.

In the event that additional suspect materials are encountered that are not addressed in this report, the materials should be properly tested by an accredited inspector. For example, during renovation and demolition it is likely that additional suspect material will be encountered and such suspect materials should be assumed to be hazardous until proper inspection and testing occurs.

RPF followed applicable industry standards; however, various assumptions and limitations of the methods can result in missed materials or misidentification of materials due several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspection, assumptions regarding the determination of homogenous groups of suspect material, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar material. Also reference the Limitations document attached to the report.

Summary of Methodology: Lead in Paint Survey

Screening for lead in paint (LP) was performed using bulk sampling of paint or using an X-Ray Fluorescence (XRF) meter for in situ measurements of various painted surfaces. For bulk sampling, samples for determinations were collected by scraping lead paint chips from the substrate. The surveyor attempted to sample layers of paint down to the substrate surface at each sample location. Samples were placed into proper sample containers, the containers were then sealed, labeled and shipped with chain of custody to the RPF AIHA accredited vendor laboratory. The samples were analyzed for total lead content using SW 846 3050B - NIOSH Method 7420. For XRF screening, the device was used and calibrated in accordance with the equipment and industry guidelines applicable for the specific testing performed.

Unless specific TCLP waste characterizations were included in the RPF Scope of Work (SOW), further analysis of waste streams for toxicity characteristics including, but not necessarily limited to lead, may be required prior to disposal of the waste stream. Other toxics may also be present including other heavy metals and PCBs and it may also be necessary to conduct waste characterization for these materials.

Sampling was limited to the specific components as listed in the RPF Report and testing and survey was not completed on every different surface in every room or area in the building. In addition unless otherwise noted in the RPF Report, surface dust, air and soil testing were not conducted during this survey. In order to conduct thorough hazard assessments for lead exposures, representative surface dust testing and air monitoring throughout the building, LBP testing of all surfaces in the building, and representative soil testing in the exterior areas should be completed. This type of testing and analysis was beyond the SOW for the initial survey

The intent of this survey is for lead in construction purposes, not for lead abatement, lead inspections, or lead hazard assessments in residential situations. Specific survey and inspection protocols are required for residential lead-based paint inspections that were not included in the RPF SOW.

RPF followed applicable industry standards for construction related identification in nonresidential settings; however, RPF does not warrant or certify that all lead or other hazardous materials in or on the building has been identified and included in this report. Various assumptions and limitations of the methods can result in missed materials or misidentification of materials due several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to inspect or sample, assumptions regarding the determination of homogenous or like types of paint, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar appearing material. Also reference the Limitations document attached to the report.

Summary of Methodology: Polychlorinated Biphenyls, Mercury and Refrigerants

Various, accessible fluorescent light fixtures were inspected to determine if the ballasts contain a “No PCBs” label. Ballasts that do not have the “No PCBs” label are assumed to contain PCB.

Only limited fixtures were checked based on accessibility and safety concerns. Further inspection will be required during the course of construction, maintenance, renovation and demolition.

Various equipment and machinery within the building may also contain PCB oils. Specific findings relating to such equipment and machinery were not included in the RPF SOW.

It is common to find fluorescent light bulbs, thermostats and switches are present in buildings. RPF performed a visual inspection of specific areas included in the RPF SOW in an attempt to identify such materials. Findings are limited to the specific accessible space accessed by RPF.

Various compressor and refrigerant equipment may be present and is should be assumed that such equipment contains Freon or other chlorofluorocarbons unless otherwise tested or documented. Although general comment may be provided in the RPF Report, the specific identification of all potential Freon and CFCs is not included in the RPF SOW.

The findings may or may not be fully representative of all of the entire building. Confirmation testing and analysis of PCB, refrigerants and mercury was not included in the RPF SOW.

RPF followed applicable industry standards; however, RPF does not warrant or certify that all hazardous material in or on the building has been identified and included in this report. Various assumptions and limitations of the methods can result in missed materials or misidentification of materials due several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspection, electrical safety considerations, and assumptions relating to areas or material being representative of other locations which in fact may not be representative. Also reference the Limitations document attached to the report.

LIMITATIONS

1. The observations and conclusions presented in the Report were based solely upon the services described herein, and not on scientific tasks or procedures beyond the RPF Environmental, Inc. Scope of Work (SOW) as discussed in the proposal and/or agreement. The conclusions and recommendations are based on visual observations and testing, limited as indicated in the Report, and were arrived at in accordance with generally accepted standards of industrial hygiene practice and asbestos professionals. The nature of this survey or monitoring service was limited as indicated herein and in the report or letter of findings. Further testing, survey, and analysis is required to provide more definitive results and findings.
2. For site survey work, observations were made of the designated accessible areas of the site as indicated in the Report. While it was the intent of RPF to conduct a survey to the degree indicated, it is important to note that not all suspect ACM material in the designated areas were specifically assessed and visibility was limited, as indicated, due to the presence of furnishings, equipment, solid walls and solid or suspended ceilings throughout the facility and/or other site conditions. Asbestos or hazardous material may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition proceeds. Access and observations relating to electrical and mechanical systems within the building were restricted or not feasible to prevent damage to the systems and minimize safety hazards to the survey team.
3. Although assumptions may have been stated regarding the potential presence of inaccessible or concealed asbestos and other hazardous material, full inspection findings for all asbestos and other hazardous material requires the use of full destructive survey methods to identify possible inaccessible suspect material and this level of survey was not included in the SOW for this project. For preliminary survey work, sampling and analysis as applicable was limited and a full survey throughout the site was not performed. Only the specific areas and /or materials indicated in the report were included in the SOW. This inspection did not include a full hazard assessment survey, full testing or bulk material, or testing to determine current dust concentrations of asbestos in and around the building. Inspection results should not be used for compliance with current EPA and State asbestos in renovation/demolition requirements unless specifically stated as intended for this use in the RPF report and considering the limitations as stated therein and within this limitations document.
4. Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas. The survey results only apply to areas specifically accessed by RPF during the survey. Interiors of mechanical equipment and other building or process equipment may also have asbestos and other hazardous material present and were not included in this inspection. For renovation and demolition work, further inspection by qualified personnel will be required during the course of construction activity to identify suspect material not previously documented at the site or in this survey report. Bordering properties were not investigated and comprehensive file review and research was not performed.
5. For lead in paint, observations were made of the designated accessible areas of the site as indicated in the Report. Limited testing may have been performed to the extent indicated in the text of the report. In order to conduct thorough hazard assessments for lead exposures, representative surface dust testing, air monitoring and other related testing throughout the building, should be completed. This type of in depth testing and analysis was beyond the scope of services for the initial inspection. For lead surveys with XRF readings, it is recommended that surfaces found to have LBP or trace amount of lead detected with readings of less than 4 mg/cm² be confirmed using laboratory analysis if more definitive results are required. Substrate corrections involving destructive sampling or damage to existing surfaces (to minimize XRF read-through) were not completed. In some instances, destructive testing may be required for more accurate results. In addition, depending on the specific thickness of the paint films on different areas of a building component, differing amounts of wear, and other factors, XRF readings can vary slightly, even on the same building component. Unless otherwise specifically stated in the scope of services and final report, lead testing performed is not intended to comply with other state and federal regulations pertaining to childhood lead poisoning regulations.

6. Air testing is to be considered a “snap shot” of conditions present on the day of the survey with the understanding that conditions may differ at other times or dates or operational conditions for the facility. Results are also limited based on the specific analytical methods utilized. For phase contrast microscopy (PCM) total airborne fiber testing, more sensitive asbestos-specific analysis using transmission electron microscopy (TEM) can be performed upon request.
7. For asbestos bulk and dust testing, although polarize light microscopy (PLM) is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, some industry studies have found that PLM may not be sensitive enough to detect all of the asbestos fibers in certain nonfriable material, vermiculate type insulation, soils, surface dust, and other materials requiring more sensitive analysis to identify possible asbestos fibers. In the event that more definitive results are requested, RPF recommends that confirmation testing be completed using TEM methods or other analytical methods as may be applicable to the material. Detection of possible asbestos fibers may be made more difficult by the presence of other non-asbestos fibrous components such as cellulose, fiber glass, etc., by binder/matrix materials which may mask or obscure fibrous components, and/or by exposure to conditions capable of altering or transforming asbestos. PLM can show significant bias leading to false negatives and false positives for certain types of materials. PLM is limited by the visibility of the asbestos fibers. In some samples the fibers may be reduced to a diameter so small or masked by coatings to such an extent that they cannot be reliably observed or identified using PLM.
8. For hazardous building material inspection or survey work, RPF followed applicable industry standards; however, RPF does not warrant or certify that all asbestos or other hazardous materials in or on the building has been identified and included in this report. Various assumptions and limitations of the methods can result in missed materials or misidentification of materials due to several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspect, assumptions regarding the determination of homogenous groups of suspect material, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar material.
9. Full assessments often requires multiple rounds of sampling over a period of time for air, bulk material, surface dust and water. Such comprehensive testing was beyond the scope of RPF services. In addition clearance testing for abatement, as applicable, was based on the visual observations and limited ambient area air testing as indicated in the report and in accordance with applicable state and federal regulations. The potential exists that microscopic surface dust remains with contaminant present even in the event that the clearance testing meets the state and federal requirements. Likewise for building surveys, visual observations are not sufficient alone to detect possible contaminant in settled dust. Unless otherwise specifically indicated in the report, surface dust testing was not included in the scope of the RPF services.
10. For abatement or remediation monitoring services: RPF is not responsible for observations and test for specific periods of work that RPF did not perform full shift monitoring of construction, abatement or remediation activity. In the event that problems occurred or concerns arouse regarding contamination, safety or health hazards during periods RPF was not onsite, RPF is not responsible to provide documentation or assurances regarding conditions, safety, air testing results and other compliance issues. RPF may have provided recommendations to the Client, as needed, pertaining to the Client’s Contractor compliance with the technical specifications, schedules, and other project related issues as agreed and based on results of RPF monitoring work. However, actual enforcement, or waiving of, contract provisions and requirements as well as regulatory liabilities shall be the responsibility of Client and Client’s Contractor(s). Off-site abatement activities, such as waste transportation and disposal, were not monitored or inspected by RPF.
11. For services limited to clearance testing following abatement or remediation work by other parties: The testing was limited to clearance testing only and as indicated in the report and a site assessment for possible environmental health and safety hazards was not performed as part of the scope of this testing. Client, or Client’s abatement contractor as applicable, was responsible for performing visual inspections

of the work area to determine completeness of work prior to air clearance testing by RPF.

12. For site work, including but not limited to air clearance testing services, in which RPF did not provide full site safety and health oversight, abatement design, full shift monitoring of all site activity, RPF expresses no warranties, guarantees or certifications of the abatement work conducted by the Client or other employers at the job site(s), conditions during the work, or regulatory compliance, with the exception of the specific airborne concentrations as indicated by the air clearance test performed by RPF during the conditions present for the clearance testing. Unless otherwise specifically noted in the RPF Report, visual inspections and air clearance testing results apply only to the specific work area and conditions present during the testing. RPF did not perform visual inspections of surfaces not accessible in the work area due to the presence of containment barriers or other obstructions. In these instances, some contamination may be present following RPF clearance testing and such contamination may be exposed during and after removal of the containment barriers or other obstructions following RPF testing services. Client or Client's Contractor is responsible for using appropriate care and inspection to identify potential hazards and to remediate such hazards as necessary to ensure compliance and a safe environment.
13. The survey was limited to the material and/or areas as specifically designated in the report and a site assessment for other possible environmental health and safety hazards or subsurface pollution was not performed as part of the scope of this site inspection. Typically, hazardous building materials such as asbestos, lead paint, PCBs, mercury, refrigerants, hydraulic fluids and other hazardous product and materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the Report.
14. For mold and moisture survey services, RPF services did not include design or remediation of moisture intrusion. Some level of mold will remain at the site regardless of RPF testing and Contractor or Client cleaning efforts. RPF testing associated with mold remediation and assessments is limited and may or may not be representative of other surfaces and locations at the site. Mold growth will occur if moisture intrusion deficiencies have not been fully remedied and if the site or work areas are not maintained in a sufficiently dry state. Porous surfaces in mold contaminated areas which are not removed and disposed of will likely result in future spore release, allergen sources, or mold contamination.
15. Existing reports, drawings, and analytical results provided by the Client to RPF, as applicable, were not verified and, as such, RPF has relied upon the data provided as indicated, and has not conducted an independent evaluation of the reliability of these data.
16. Where sample analyses were conducted by an outside laboratory, RPF has relied upon the data provided, and has not conducted an independent evaluation of the reliability of this data.
17. All hazard communication and notification requirements, as required by U.S. OSHA regulation 29 CFR Part 1926, 29 CFR Part 1910, and other applicable rules and regulations, by and between the Client, general contractors, subcontractors, building occupants, employees and other affected persons were the responsibility of the Client and are not part of the RPF SOW.
18. The applicability of the observations and recommendations presented in this report to other portions of the site was not determined. Many accidents, injuries and exposures and environmental conditions are a result of individual employee/employer actions and behaviors, which will vary from day to day, and with operations being conducted. Changes to the site and work conditions that occur subsequent to the RPF inspection may result in conditions which differ from those present during the survey and presented in the findings of the report.