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February 13, 2008

Mr. Paul LaChance
St. Paul's School
325 Pleasant Street
Concord, NH 03301

Re: AHERA Campus Wide Survey
RPF File 06.2267

Dear Mr. LaChance:

As requested by St. Paul's School, RPF performed a campus wide review of the status of EPA Asbestos AHERA Inspection documentation as well as asbestos inspections relative to renovation and demolition. The reinspection portion of the work included a visual inspection of the areas known to contain asbestos-containing building materials (ACBM) as listed in the existing building files. In addition, RPF performed initial AHERA inspections at sites 407, 469, and 37. The reinspection document and initial inspection reports were provided previously to you and copies of the documents are enclosed herein.

Also enclosed is a campus survey summary which indicates the current status for building surveys at each of the buildings. Please note buildings constructed after 1988, including buildings with substantial renovations, require a statement from the architect or engineer stating no asbestos was specified or used during the construction (in lieu of this certification an initial AHERA is required). Buildings which have had minor renovations or material replacements should have MSDS information for newly installed material indicating that the replacement material is asbestos-free.

If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to call me.

Sincerely,
RPF ASSOCIATES, INC.

A handwritten signature in cursive script that reads "Kara L. Forsythe".

Kara Forsythe
EH&S Consultant

Enclosures

06.2267 Rpt 021308

Asbestos Survey Status Summary

Site #	Site Name	Date Built	Renovation (Yr)	Addition (YR)	No accessible interior ACBM present	ACBM present	Requires A/E Asbestos Certification	If reno/demo needs survey
ACADEMIC FACILITIES								
1	SCHOOL HOUSE	1935	1990			X		X
2	PAYSON	1951		1986		X		X
4	ASTRONOMY CTR.	1984			X			X
5	4EA OBSV. BLDGS	1984			X			X
6	MOORE	1960				X		X
ARTS FACILITIES								
11	HARGATE	1828	1966			X		X
12	DRAMA/NEWSpace	1979				X		X
13	OATES PERFORMING-Music	1979				X		X
	OATES PERFORMING-Dance					X		X
ATHLETIC FACILITIES								
20	CLUBHOUSE	2000					X	
21	CAGE	1958					X	
22	LWR GRNDS STRG	1880			X			X
23	SQUASH COURTS	1915	1992	1992	X			
24	ATHLETIC/FITNESS CENTER	2004					X	
25	LAUNCH HOUSE	1960			X			X
26	SHATTUCK BOAT	1960		1993	X			X
27	HALCYON BOAT	1960			X			x
33	HOCKEY CENTER	1998					X	
34	CONNECTOR BUILDING	1998					X	
35	GORDON RINK	1952	1968/98	1965			X	
36	INGALLS RINK	1998					X	
37	CROSS COUNTRY SKI HUT	1999			X			X
MULTIPURPOSE FACILITIES								
50	RECTORY	1872	1960/92/93					
51	CHAPEL SP & SP	1886	2002	1928		X		
52	OLD CHAPEL	1858	1988/2002		X		X	
53	SHELDON LIBR	1901	1994		X		X	
54	OHRESTROM LIB	1991			X		X	
55	MEMORIAL HALL	1951				X		X
FACULTY/STUDENT HOUSING FACILITIES								
100	FOSTER	1901	1960/89/95				X	
210	Foster Apt.						X	
211	Foster Apt.						X	
212	Foster Apt.						X	

Asbestos Survey Status Summary

Site #	Site Name	Date Built	Renovation (Yr)	Addition (YR)	No accessible interior ACBM present	ACBM present	Requires A/E Asbestos Certification	If reno/demo needs survey
105	MIDDLE				X		X	
264	Middle House Apt.	1955	1993/1998		X		X	
265	Middle 2nd Flr. Apt.				X		X	
266	Middle 3rd Flr. Apt.				X		X	
106	ARMOUR	1912	1996		X		X	
340	ARMOUR Apt. West				X		X	
341	ARMOUR Apt. East				X		X	
342	ARMOUR Apt. Center				X		X	
107	CONOVER 20	1962	1995/1998		X		X	
269	Con/20 Apt				X		X	
271	Con/20 Apt				X		X	
272	Con/20 Apt				X		X	
111	NASH	1915	1964/93/94	1994		X	X	
278	Nash Apt.				X		X	
279	Nash Apt.				X		X	
113	KITTREDGE	1968	1972/89/96			X	X	
114	KITT I	1968	1996			X	X	
115	KITT II	1968	1996			X	X	
116	KITT III	1968	1996			X	X	
117	KITT LINK	1984			X			X
280	Kitt Apt.					X		
281	Kitt Apt.					X		
282	Kitt Apt.					X		
283	Kitt Apt.					X		
284	Kitt Apt.					X		
285	Kitt Apt.					X		
286	Kitt Apt.					X		
120	COIT HOUSE	1900	1991/92		X		X	
122	COIT CENTER	1900	1992		X		X	
293	Coit Center Apt.				X		X	
294	Coit Center Apt.				X		X	
295	Coit Center Apt.				X		X	
124	COIT NORTH	1900	1992		X		X	
290	Coit North Apt.				X		X	
291	Coit North Apt.				X		X	
292	Coit North Apt.				X		X	
126	COIT WING	1900	1992		X		X	

Asbestos Survey Status Summary

Site #	Site Name	Date Built	Renovation (Yr)	Addition (YR)	No accessible interior ACBM present	ACBM present	Requires A/E Asbestos Certification	If reno/demo needs survey
297	Coit Wing Apt.				X		X	
298	Coit Wing Apt.				X		X	
130	DRURY	1939	1994	1994	X		X	
300	Drury Apt.		2000		X		X	
301	Drury Apt.		1994		X		X	
302	Drury Apt.		1994		X		X	
131	KEHAYA	1993			X		X	
334	Kehaya Apt.				X		X	
335	Kehaya Apt.				X		X	
336	Kehaya Apt.				X		X	
132	SIMPSON	1926	1997	1997	X		X	
308	Simpson Apt.				X		X	
309	Simpson Apt.				X		X	
31D	Simpson Apt.				X		X	
134	FORD	1926	1997	1997	X		X	
315	Ford Apt.				X		X	
316	Ford Apt.				X		X	
31C	Ford Apt.				X		X	
136	MANVILLE	1926	1997	1997	X		X	
318	Manville Apt.				X		X	
319	Manville Apt.				X		X	
31B	Manville Apt.				X		X	
139	BREWSTER	1926	1996	1996	X		X	
320	Brewster Apt.				X		X	
321	Brewster Apt.				X		X	
32A	Brewster Apt.				X		X	
140	WARREN	1918	1988, 2005		X		X	
310	Warren Apt.				X		X	
311	Warren Apt.				X		X	
312	Warren Apt.				X		X	
	Subtotal							
	FACULTY HOUSING FACILITIES							
203	Tuttle	1896	1992			X		X
208	Oziomek	1928	1989, 2001			X		X
209	Hirchfeld	1894	1993, 2001			X		X
213	Dickson	1874	1988			X		X
214	Faculty Triplex	2005				X		X

Asbestos Survey Status Summary

Site #	Site Name	Date Built	Renovation (Yr)	Addition (YR)	No accessible interior ACBM present	ACBM present	Requires A/E Asbestos Certification	If reno/demo needs survey
217	Triplex Apt. Center	2005					X	
218	Triplex Apt. West	2005					X	
228	Seaton	1925				X		X
229	Ryder/Clark	1881	1994, 2001			X		X
234	7 Fisk Road	1874		1993		X		X
235	6 Fisk Road	1946	1995			X		X
237	11 Fisk Road	1874				X		X
242	Faulkner	1911				X		X
243	Old Miller House	1885	1990, 2001			X		X
245	Old Miller House Apt.	1885	1990, 2001			X		X
246	Old Miller House Apt.	1885	1990, 2001			X		X
247	Faculty House	2004					X	
248	Patenotte	1911	1990			X		X
249	Pardo	1910				X		X
250	Hill Farm Duplex	1886				X		X
251	Hill Farm Duplex Apt.	1886				X		X
252	Hill Farm Duplex Apt.	1886				X		X
254	Ellison	1929	2004			X		X
255	Morgan	1910	1990			X		X
257	Jerome Ridge #1	1885	1989	2001		X		X
259	Jerome Ridge #2	1898	2003			X		X
260	Jerome Ridge #3	1888	1995			X		X
261	Jerome Ridge #4	1895	1995			X		X
274	New Duplex	2003					X	
275	Faculty Apt.	2003					X	
276	Faculty Apt.	2003					X	
277	Faculty House	2003					X	
289	Brandt	1872	1997	1997		X		X
303	Honor	1870	1995			X		X
304	Brewster	1923	1992			X		X
305	Carlisle	1881	1987			X		X
322	Crutchfield	1894	1993, 2004				X	
325	Saw Mill Road House	1994					X	
326	Saw Mill Road House	1994					X	
327	Saw Mill Road House	1991	1991				X	
329	1918 House	1970						
330	1944 House	1970				X		X

Asbestos Survey Status Summary

Site #	Site Name	Date Built	Renovation (Yr)	Addition (YR)	No accessible interior ACBM present	ACBM present	Requires A/E Asbestos Certification	If reno/demo needs survey
332	Silk Farm Road House	1875	2000			X	X	X
333	Freese Farm	1900			Requires Initial AHERA survey			
SUPPORT FACILITIES								
401	ALUMNI	1901	1987/90			X		X
204	GUEST ROOM 5 Alumni	1901						X
205	GUEST ROOMS 3&4 Alumni	1901						X
206	GUEST RM 2 Alumni	1901						X
207	GUEST APT Alumni	1901						X
402	SCUDDER	1940				X		X
403	RED BARN	1895				X		X
404	POWER HOUSE	1927				X		X
405	FREEMAN CENTER	1970	1990				X	X
406	POST OFFICE	1886	1965			X		X
407	LARGE COW BARN	1866				X		X
407	MILK BARN	1886			X			X
407	PIG BARN	1900			X			X
407	CALF BARN	1970				X		X
408	MAINTENANCE (CHP)	1927			X			X
409	BOOK STORE (CHP)	1927	1990				X	X
410	TUCK SHOP	1880	1990			X		X
411	SERVICE BLDG	1890			X			X
412	VEHICLE GARAGE	2002					X	
412	GARAGE STALLS	1930			X			X
413	GARAGE & FACULTY TRIPLEX	1997					X	
414	UPPER FOOD SERV	1902				X		X
415	CLC	1991					X	
416	CLARK HOUSE	1920			Requires Initial AHERA survey			X
417	POLE BARN	2002					X	
469	FREES FARM BARN	1950						X
470	STICKNEY HILL BARN	1894			Requires Initial AHERA survey			X
471	MILLER COTTAGE GARAGES	1990			X		X	
473	GARAGES @ COIT	1975			X			X
474	GARAGES @ COIT	1975			X			X
475	GARAGES @ KEHAYA	1993			X			X
476	GARAGES @ DRURY	1994			X			X

Any campus buildings with renovations that did not involve full demolition may still have some hidden ACBM present. Care is required in these cases during future demolition work.



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ST. PAUL'S SCHOOL
2006 ASBESTOS 3 YEAR REINSPECTION
School Building

Prepared by:
RPF ASSOCIATES, INC.
320 First NH Turnpike
Northwood, NH 03261
603-942-5432

Introduction

RPF Associates, Inc. (RPF) conducted asbestos reinspection work for the St. Paul's School (SPS) located in Concord, New Hampshire during the period of October 11 through November 1, 2006. Buildings included in this phase of the reinspection work consisted of: Memorial Hall, Moore Building, Payson Service Center, School House, Power Plant, Gymnasium, Tuck Stores, Music and Dance, Alumni Hall, Post Office, Red Barn, Upper Building, Kittredge, White Farm, Hargate Art Center, Scudder House, and the New Chapel.

The subsequent associated management planner review and assessment work was performed during this period as well. The reinspection work was completed in accordance with Part 763.85 (b) of 40 CFR Part 763, Subpart E - Asbestos Hazard Emergency Response Act (AHERA). As we reviewed, the scope-of-services for the reinspection included a visual inspection of the areas known to contain asbestos-containing building materials (ACBM) and assumed ACBM, which was documented, as of the time of this reinspection, in the above referenced buildings as stated in the AHERA inspection records provided to RPF for review.

Reinspection Methods

All accessible ACBM which were identified in the existing AHERA reports were visually reinspected in accordance with AHERA, to (a) observe whether the materials are friable, (b) observe the conditions of the ACBM and potential for disturbance, and (c) to assess the hazard potential of the ACBM. Documentation review consisted of only those specific documents which list ACBM and which were provided by the School to RPF for review. A full review or audit of the AHERA Plans for each building, including abatement records, other record keeping requirements, or AHERA implementation records was not completed as part of this service.

Please note that this reinspection report is intended to comply with the federal regulation and the report should not be considered or referenced as a detailed full, initial AHERA room-by-room inspection. Please also reference the initial 1988 AHERA Inspection Report prepared for the building by AOHHS, subsequent update reinspection records prepared by RPF, and 6-month surveillance update reports prepared by the School's Program Manager. This reinspection does not meet the requirements for full inspections prior to renovation or demolition activity.

A full inspection (for confirmation of previous inspection results) was also not completed during this project. In the event that other readily accessible suspect materials were observed by the inspector during the course of the reinspections (materials that may have been missed during the initial inspection or may require confirmation testing), the inspector provide preliminary notation on the reinspection reports to make the School aware that additional inspection or review may be required; however, in accordance with the AHERA reinspection requirements, the inspector did not conduct full initial inspection during the course of the reinspection work.

Signatures

The reinspection work and management planning was completed by Kara Forsythe and Roger Francoeur of RPF Associates, Inc.

Accredited Inspectors


Kara L. Forsythe, NH AI000211 Exp. 10/24/07

Accredited Inspector/Management Planner


Roger Francoeur, NH AM00025, Exp. 08/31/07

Assessments and Recommendations

Attachment 1 includes general comments and preliminary recommendations for compliance with AHERA that need to be reviewed and considered by the School. Attachment 2 contains a listing of the ACBMs reinspected during this project and the AHERA assessment and minimum responses for each area of ACBM. For areas with damaged ACBM listed, care must be used to prevent further disturbance and to avoid the creation of dust. Areas with damaged material should also be prioritized for abatement work.

It is recommended that a preliminary audit of the AHERA files and recordkeeping procedures and policies in general be performed as needed to ensure future compliance with 40 CFR Part 763 and other applicable state and federal regulations.

The report findings and recommendations should be reviewed by the School's designated asbestos coordinator and a plan for implementation should be prepared, as applicable. Any ACBM maintenance or repair activity must be conducted by accredited personnel using proper personal protective equipment. Properly accredited personnel and certified laboratories must conduct all ACBM testing. Response actions, as defined by AHERA, must be detailed in a specification (project design) prepared by a license asbestos abatement project designer in accordance with AHERA and NH Admn. Rule He-P 5000. Finally, properly licensed personnel and contractors must carry out response actions and the work must be monitored/tested by a qualified environmental testing firm.

The School must continue with their ACBM surveillance activity every 6 months, training of maintenance and custodial staff, annual notifications, labeling and other Management Plan items. *A copy of this report must be filed in the School central office.* If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to contact our office.

Other General Recommendations and Comments

Below are other general comments and recommendations to be reviewed and considered by the School for compliance with current State and Federal regulations and industry standards. The comments and recommendations should be reviewed in conjunction with the findings and discussions contained in the text of the report, attachments, and the federal standard, 40 CFR Part 763 and other applicable State and federal standards.

- The 1988 initial AHERA reports should be reviewed for detailed initial inspection results, Management Plan and O&M Plan requirements, analytical data, and other related documentation. Except as otherwise noted the reinspection work only included ACBM identified in the inspection reports provided to RPF by the School. During the reinspection, initial inspections, abatement documentation and other record keeping items were not completely reviewed or audited for accuracy and completeness. This type of review was beyond the scope of services for the project. Based on the RPF preliminary review of the records provided to RPF, it is our opinion that the AHERA Plans may not address all of the possible ACBM present. For example, although not directly regulated by AHERA, various exterior suspect materials are present as well as hidden interior ACBM in some locations.
- This reinspection only included the school buildings designated in the RPF listing. Other buildings used as school buildings in accordance with 40 CFR Part 763 still require reinspection as reviewed with the School and this additional work will be scheduled by the School as soon as feasible. For any new buildings or renovated space, obtain architectural statements for new construction/renovation areas in accordance with AHERA certifying no asbestos was specified or used.
- All ACBMs must be included in the Management Plan and O&M Program until the materials are completely removed. The ACBM listings in the Reports should be reviewed and updated periodically to reflect all abatement work, any testing performed, and all O&M Program maintenance or repair activity completed. Examples of activity that must be documented include but are not limited to the following: covering area of ACBM tile with carpet or other newer flooring; installation of other new building materials - certification of asbestos-free material must be obtained and filed; any sampling and testing; any spot asbestos repairs or removal work; personnel training; annual notifications; and other activities.
- Materials listed as MNO (materials not observed) should be reviewed further by the Program Manager to determine if in fact such materials were abated, if abatement records are on file, and/or, if the areas were not accessible that such materials be inspected when the areas can be accessed. ACBM assumed to be enclosed should continue to be documented as such for future renovations/demolition issues. Please note that new enclosures are a form of abatement and are subject to the requirements of AHERA as a response action.

- Inaccessible ACBMs are or may be present in wall, floor, ceiling, and other spaces not accessible during the inspection. Care should be used during any renovation or demolition work. If suspect materials are encountered, the materials must be properly tested by a NH licensed inspector and, if in fact identified as ACBM, properly abated prior to disturbance. All contractors and other persons working in the building who may come into contact with the ACBM should be properly notified in accordance with current State and federal regulations.
- Certain types of floor maintenance activities can result in release of asbestos fibers. Proper cleaning, stripping, and finishing methods should be used as recommended by the State of NH and U.S.E.P.A. guidelines. Depending on the condition of various non-friable ACBMs and the specific action/disturbance to the material (i.e., chipping of flooring during removal, cutting and abrasive activities, or sanding/scraping of adhesives), non-friable ACBM can be rendered friable. This is particularly true with flooring materials that are aged, thin, brittle, or have prolonged water damage.
- Flooring mastic, along with any floor tile or linoleum that is ACBM was or may have been assumed to be ACBM, should continue to be classified as ACBM and properly tested prior to any flooring removal work, as applicable. It should be noted that a recent EPA advisory statement recommends that flooring which was previously tested as asbestos free be confirmed using electron microscopy prior to any removal or other activities that may result in the disturbance of the flooring.
- All assumed ACBM should be properly tested by a licensed inspection firm, prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. This type of testing *should not* be conducted by asbestos abatement contractors, but by a qualified licensed consulting/laboratory firm.
- In accordance with State and federal regulations, ACBM must be abated prior to disturbance due to renovation or demolition activity, or maintenance activity that will result in disturbance to the materials. This work must be properly designed in advance of the planned work and it must be implemented by properly trained, accredited, and/or licensed individuals as applicable.
- Abatement of friable and non-friable ACBM should be designed by, and monitored by, a qualified/certified consultant. Trained, licensed workers and firms should complete all abatement work. Please note that exterior building materials, such as roofing materials, were often not included in the initial inspection work and should be properly tested prior to any renovation or demolition. It is recommended that sufficient time be allowed prior to any renovation or construction work for accredited design, review, and impact study to determine abatement work that may be necessitated to facilitate renovation. It should also be determined that all suspect materials have been properly sampled in the existing reports prior to work.
- O&M level trained employees may be able to perform small scale, short duration maintenance work (<3 linear/square feet) involving asbestos if all applicable state and federal requirements

are met and proper medical surveillance, safety equipment and other programs are in place. Any work in excess of 3 feet or work performed for the sole purpose of abating asbestos hazards must be designed and performed by licensed personnel and companies.

- All janitorial, custodial, and maintenance staff require a minimum of 2-hour asbestos awareness training and maintenance staff who perform O&M work must also have another 14 hours of training. Maintenance staff performing O&M work must also receive at least 4-hours refresher training every two years for the State and annual refresher training is required for 2-Hour and 16-Hour personnel in accordance with 29 CFR Part 1926.1101.
- A general review of the AHERA Plans should be completed periodically to ensure compliance with record keeping, training, labeling of ACBM in maintenance areas and as required by OSHA, annual notifications, and other requirements. The school must also continue with their 6-month surveillance activities. Certain record keeping and notification requirements may still be required regardless of whether new construction has occurred or all ACBMs have been removed.

The following Attachment 1 includes an index sheet with a description of codes used in the Attachment 2 building listings of ACBM assessed during this reinspection.

ATTACHMENT 1

CODE DESCRIPTIONS

(Index sheet for use with individual building listings included with Attachment 2)

EPA Assessment Codes:

1. Damaged or significantly damaged thermal systems insulation asbestos containing material (ACM)
2. Damaged friable surfacing ACM
3. Significantly damaged friable surfacing ACM
4. Damaged or significantly damaged friable miscellaneous ACM
5. ACBM with the potential for damage
6. ACBM with the potential for significant damage
7. Any remaining ACBM or friable suspected ACBM
- NF. Material is nonfriable and assessments are not required.

Response Summary Codes: (Summary of minimum recommendations only, please reference text of report and Attachment 2 for additional recommendations.)

<u>Code</u>	<u>Description</u>
-------------	--------------------

- | | |
|----|---|
| 1. | Continue to manage this ACBM under the buildings Management Plan, Operations and Maintenance (O&M) Program and AHERA. Conduct spot maintenance repairs of any minor damage present (nonfriable ACBM) or that occurs in accordance with AHERA and the School O&M Program. |
| 2. | Conduct repair, surface cleaning, encapsulation or enclosure response actions for this ACBM in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage this ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. Some small-scale maintenance work (<3 linear/square feet) can be completed by the School's maintenance staff if they qualify for the licensing exemption and they possess adequate training, current refresher training, and the necessary personal protective equipment and safety programs in place. |
| 3. | Remove the ACBM and conduct surface decontamination as recommended by accredited/licensed project designer in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage any remaining ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). All assumed ACBM should be properly tested by a licensed inspection prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. All abatement activities must be conducted by properly accredited and licensed personnel/companies. |
| 4. | Complete verification of AHERA Inspection documentation. Licensed inspector must assume materials are ACBM or properly test additional suspect ACBM. Exterior materials, except under certain circumstances, are not covered under AHERA but still must be inspected and handled as ACBM in accordance with other State, local, and federal regulations. Licensed inspector and management planner must update ACBM listings and Management Plans as needed. Obtain architectural statements for new construction/renovation areas in accordance with AHERA. Confirm that proper numbers of samples have been collected. |
| 5. | Abated material may be removed from ACBM listing. Materials have been removed and abatement records are on file. RPF did not audit records for completeness or accuracy. |
| 6. | Material could not be located and may have been abated, or it was not possible to confirm if the materials observed were in fact newer replacement materials. Verify abatement records and, if all records are obtained and complete, update the ACBM listings to reflect the abatement work. If an MNO listing is due to an inaccessible area or locked room, such areas should be inspected when feasible. |

ATTACHMENT 2

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Red Barn								
First Floor								
Shop	Transite Ceiling Panel	600 sq. ft	Misc.	No	Good	NF	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See code description sheet, further discussion, and</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Upper Building: Site No. 120								
Basement								
Storage Rm. D (former Pelican Rm.)	Ceiling Patch	-----	Surf.	MNO	MNO	MNO	6	
Basement Corridor	Ceiling Plaster	3,000 sq. ft	Surf.	Yes	Fair	2	2	Some areas of damaged material observed and should be repaired as soon as feasible
Storage A	Ceiling Plaster	400 sq. ft	Surf.	Yes	Damaged	3	2 or 3	Damaged material throughout and should be repaired or removed as soon as feasible
Storage B	Ceiling Plaster	300 sq. ft	Surf.	Yes	Good	5	1	
Basement and Laundry	Ceiling Plaster	500 sq. ft	Surf.	Yes	Good	5	1	
Crawlspace	Pipe Fittings	-----	TSI	MNO	MNO	MNO	6	Materials could not be located
First Floor								
Common Room	Flooring Paper	1,400 sq. ft	Misc.	MNO	MNO	MNO	1	Material is under wood flooring
Rm. 414 Large Dining	Flooring Paper	3,000 sq. ft	Misc.	MNO	MNO	MNO	1	Material is under wood flooring
Second Floor								
Food Service	Flooring Paper	700 sq. ft	Misc.	MNO	MNO	MNO	1	Material is under wood flooring
Food Service	Ceiling Plaster	700 sq. ft	Surf.	Yes	Good	5	1	
Third Floor								
Room 1	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 2	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 3	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 4	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 5	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 6	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
See notes on last page								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Frable	Condition	Assessment	Response	Notes
Upper Building: Site No. 120								
Third Floor Continued								
Room 7	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 8	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 9	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 10	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 11	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Room 12	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Men's Bath	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
Women's Bath	Flooring Paper	50 sq. ft	Misc.	MNO	MNO	MNO	1	
	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
	Flooring Paper	50 sq. ft	Misc.	MNO	MNO	MNO	1	
Corridor	Ceiling Plaster	75 sq. ft	Surf.	Yes	Good	5	1	
	Wall Plaster	400 sq. ft	Surf.	Yes	Good	5	1	
	Flooring Paper	50 sq. ft	Misc.	MNO	MNO	MNO	1	

See notes on last page

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Upper Building: Site No. 120								
Fourth Floor								
RPF did not gain access to the 4th floor as the site representative indicated it is locked and no students or faculty go in the areas. Throughout						Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.	4	Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes	
Alumni Hall									
Basement									
Basement Bathroom	9" Floor Tile	18 Sq. Ft.	Misc	No	Good	NF	1		
First Floor									
1st Floor Bathroom	Linoleum	36 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with newer flooring according to the site representative	
ASP Office	Floor Tile	486 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpeting according to the site representative	
Business Office	Floor Tile	486 Sq. Ft.	Misc	No	MNO	MNO	1, 6		
Human Resources	Floor Tile	405 Sq. Ft.	Misc	No	MNO	MNO	1, 6		
Second Floor									
2nd Floor, Hall Closet	Transite floor	10 sq. ft.	Misc	No	Good	NF	1		
2nd Floor, A-1 Kitchen	Linoleum	63 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with newer flooring according to the site representative	
2nd Floor, A-1 Bath	Linoleum	20 Sq. Ft.	Misc	No	MNO	MNO	1, 6		
Men's Bathroom	Linoleum	12 Sq. Ft.	Misc	No	MNO	MNO	1, 6		
Office Storage	Linoleum	16 Sq. Ft.	Misc	No	MNO	MNO	1, 6		
Third Floor									
Apt. 1, Bath	Linoleum	75 sq. ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with newer flooring according to the site representative	
Apt. 4, Bath	Linoleum	75 sq. ft.	Misc	No	MNO	MNO	1, 6		
Apt. 5, Bath	Linoleum	100 sq. ft.	Misc	No	MNO	MNO	1, 6		
Hall Closet	Transite floor	5 sq. ft.	Misc	No	MNO	MNO	1, 6		
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assessment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.							4	See further discussion in report. Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.									
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.									
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.									

St. Paul's School : 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Damage	Assessment	Response	Notes
Gymnasium								
Cage	Pipe Fitting Insulation	17 Observed	TSI	Yes	MNO	MNO	5	Materials were removed by Dec-Tam Corporation during the summer of 2003
Hockey & Ski Storage	Transite	480 Sq. Ft.	Misc	No	MNO	MNO	5	
Main Corridor	9" Floor Tile	140 Sq. Ft.	Misc	No	MNO	MNO	5	
Lobby	9" Floor Tile	200 Sq. Ft.	Misc	No	MNO	MNO	5	
Custodial Closet	9" Floor Tile	12 Sq. Ft.	Misc	No	MNO	MNO	5	
Secretary's Office	9" Floor Tile	396 Sq. Ft.	Misc	No	MNO	MNO	5	
2nd Floor Gym	Pipe Fittings	10 Observed	TSI	Yes	MNO	MNO	5	
2nd Floor Weight Rm	Pipe Fittings	7 Observed	TSI	Yes	MNO	MNO	5	
Pent House	Expansion Cloth	3 Linear Ft.	Misc	No	MNO	MNO	5	
Kitchen	9" Floor Tile	13 Sq. Ft.	Misc	No	MNO	MNO	5	
Visitor Locker Rooms 1, 2, 3 and 4	12" Floor Tile	93 Sq. Ft.	Misc	No	MNO	MNO	5	
Athletic Training Rm	9" Floor Tile	819 Sq. Ft.	Misc	No	MNO	MNO	5	
Rifle Range	Fire Door Insulation	1	Misc	Yes	MNO	MNO	5	
Basement Corridor	Pipe Fittings	20 Observed	TSI	Yes	MNO	MNO	5	
Mechanical Room	Tank Jacket Insulation	72 Sq. Ft.	TSI	Yes	MNO	MNO	5	
Mechanical Room	Pipe Fittings	67 Observed	TSI	Yes	MNO	MNO	5	
Mechanical Room	Pipe Insulation	Throughout	TSI	Yes	MNO	MNO	5	
Mechanical Room	Expansion Cloth	1 Linear Ft.	Misc	No	MNO	MNO	5	
Crawl Space	Pipe Fittings	7 Observed	TSI	Yes	MNO	MNO	5	
Wrestling Room	Pipe Fittings	Unknown	TSI	Yes	MNO	MNO	5	
Note:	The school should obtain an architect and engineering statement stating no asbestos was used during the construction of the gymnasium, if they have not done so yet. This document should be kept with the AHERA records for the gymnasium.							
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF								
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Frable	Condition	Assessment	Response	Notes
Hargate Art Center: Site No. 11								
Basement								
Throughout	Pipe Fitting Insulation	-----	TSI	Yes	MNO	MNO	5	Materials were removed by Dec-Tam Corporation during the summer of 2006
Drawing Room Office	12" Floor tile	-----	Misc.	No	MNO	MNO	5	
Drawing Rooms	12" Floor tile	-----	Misc.	No	MNO	MNO	5	
Hall, Photo Room, Storage Rooms	12" Floor tile	-----	Misc.	No	MNO	MNO	5	
Supply Closet (former paint storage)	Pipe Insulation	-----	TSI	Yes	MNO	MNO	5	
Supply Closet (former)	Pipe Fitting Insulation	-----	TSI	Yes	MNO	MNO	5	
Paint Storage (former)	Pipe Fitting Insulation	-----	TSI	Yes	MNO	MNO	5	
Studio 84	Pipe Insulation	-----	TSI	Yes	MNO	MNO	5	
First Floor								
Drafting Room Corridor	12" Floor tile	100 sq. ft	Misc.	No	Fair	NF	1	Materials were observed to have some lifting throughout
Drafting Room	12" Floor tile	300 sq. ft	Misc.	No	Good	NF	1	
Gallery	12" Floor tile	1,500 sq. ft	Misc.	No	MNO	MNO	6	Materials have been removed, however no records were available at the time of the survey
See notes on following page								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Hargate Art Center: Site No. 11								
Second Floor								
North Apartment: Kitchen, Living Room	Transite	40 sq. ft	Misc.	No	Good			
North Apartment: Kitchen	Floor Tile	150 sq. ft	Misc.	MNO	MNO	MNO	1	Materials have been covered over with newer flooring according to the records for the buildings
Attic								
Over Gallery	Pipe Fitting Insulation	12 observed	TSI	Yes	Damaged	1	2	Materials were observed to have exposed edges and should be repaired as soon as feasible
Over Common Area	Pipe Fitting Insulation	19 observed	TSI	Yes	Damaged	1	3	Material was observed to be damaged with debris present on the floor and should be removed as soon as feasible
Theater Mechanical Room	Pipe Fitting Insulation	7 observed	TSI	Yes	Good	5	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.					and/or	4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes								
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Frable	Condition	Assessment	Response	Notes
Kitredge								
Site 280								
Bath	Floor Tile	60 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over
Kitchen	Floor Tile	120 sq. ft	Misc.	MNO	MNO	MNO	6	with newer flooring
Site 281								
Bath	Floor Tile	60 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over
Kitchen	Floor Tile	75 sq. ft	Misc.	MNO	MNO	MNO	6	with newer flooring
	Transite	-----	Misc.	MNO	MNO	MNO	6	Material previously listed in kitchen by sliding glass doors, however no sliding glass doors are present in the kitchen.
Bath	Floor Tile	60 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over with newer flooring
Site 283								
Kitchen	Floor Tile	75 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over
	Transite	-----	Misc.	MNO	MNO	MNO	6	Material previously listed in kitchen by sliding glass doors, however no sliding glass doors are present in the kitchen.
Bath	Floor Tile	50 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over with newer flooring
Site 284								
Bath	Floor Tile	50 sq. ft	Misc.	MNO	MNO	MNO	6	Material may have been covered over
Kitchen	Floor Tile	75 sq. ft	Misc.	MNO	MNO	MNO	6	with newer flooring
	Transite	-----	Misc.	MNO	MNO	MNO	6	Material previously listed in kitchen by sliding glass doors, however no sliding glass doors are present in the kitchen.
see notes on last page								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Kitredge Site 285								
Baths	Floor Tile	50 sq. ft/bath	Misc.	MNO	MNO	MNO	6	Material may have been covered over with newer flooring
Kitchen	Transite	-----	Misc.	MNO	MNO	MNO	6	Material previously listed in kitchen by sliding glass doors, however no sliding glass doors are present in the kitchen.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	Possible inaccessible ACBM also.

Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.

Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes.

Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.

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Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Memorial: Site No. 55								
Basement								
Corridor	Pipe Fitting Insulator	17 Observed	TSI	Yes	Good	NF	1	
Paint and Costume	Pipe Fitting Insulator	17 fittings	TSI	Yes	Damaged	1	2	Materials were observed to have
Paint and Costume	Pipe Insulation	40 lf.	TSI	Yes	Damaged	1	2	knicks and dents in the insulation and
Costume Shop	Pipe Fitting Insulator	1 Observed	TSI	Yes	Damaged	1	2	should be repaired as soon as feasible
Prop Storage	Pipe Fitting Insulation	18 Observed	TSI	Yes	Damaged	1	2	
Electrical Room	Pipe Fitting Insulator	13 Observed	TSI	Yes	Good	NF	1	
Electrical Room	Pipe Insulation	27 Linear Ft.	TSI	Yes	Good	NF	1	
Tunnel by Prop Storage	Pipe Fitting Insulation	43 Observed	TSI	Yes	Damaged	1	2	Materials were observed to have
Tunnel by Prop Storage	Pipe Insulation	309 Linear Feet.	TSI	Yes	Damaged	1	2	knicks, exposed edges, and crackson
Radio Station Mech	Pipe Insulation	-----	TSI	Yes	MNO	MNO	1, 6	approximately 10% of the materials
Radio Station Mech	Pipe Fitting Insulator	-----	TSI	Yes	MNO	MNO	1, 6	RPF could not gain access to this area
Radio Station Mech	Duct Skim Coat	-----	TSI	Yes	MNO	MNO	1, 6	at the time of the survey
Women's Dressing Rm	9" Floor Tile	75 Sq. Ft.	Misc	No	Good	NF	1	
Men's Room	Pipe Insulation	12 Linear Ft.	TSI	Yes	Good	5	1	
Rear Hall	Pipe Insulation	15 Linear Ft.	TSI	Yes	Good	5	1	
Baths Under Auditorium	Pipe Insulation	9 Linear Ft.	TSI	Yes	Good	5	1	
Foyer outside restroom:	9" Floor Tile	580 sq. ft	Misc	No	Good	NF	1	
Alpine Ski Storage (former	Pipe Insulation	10 Linear Ft.	TSI	Yes	Good	5	1	
custodian room)	Pipe Fitting Insulator	1 Observed	TSI	Yes	Good	5	1	
	9" Floor Tile	80 sq. ft	Misc	No	Good	NF	1	
see notes on last page								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Frable	Condition	Assessment	Response	Notes
First Floor								
Custodian Closet by Auditorium	Pipe Insulation	10 Linear Ft.	TSI	Yes	Good	5	1	
Second Floor								
North Stairwell	9" Floor Tile	540 Sq. Ft.	Misc	No	Good	NF	1	
Auditorium & Balcony Ceiling	Trowel On Surfacing Material	3249 Sq. Ft.	Surf	Yes	Good	5	1	
Auditorium & Balcony	9" Floor Tile	4446 Sq. Ft.	Misc	No	Fair	NF	1	Material was observed to have chips and missing tiles present
Auditorium & Balcony Wall	Trowel On Surfacing Material	570 Sq. Ft.	Surf	Yes	Good	5	1	
Attic	Pipe Insulation	108 Linear Ft.	TSI	Yes	Damaged	1	2	Material was observed to have knicks, dents, and exposed edges and should be repaired as soon as feasible
Attic	Pipe Fitting Insulation	19 Observed	TSI	Yes	Damaged	1	2	Material was observed to have knicks and dents on approximately 5% of the material and should be repaired as soon as feasible
Attic	Duct Skim Coat	150 sq. ft	TSI	Yes	Good	5	1	
Projector Room	Wire Cable Insulation	12 Linear Ft.	Misc	No	Good	5	1	
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assesment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.							
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACBM Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Frable	Condition	Assessment	Response	Notes
Moore Building								
Mechanical Room	Pipe Insulation	Throughout	TSI	MNO	MNO	MNO	1,6	Material was not observed and may have been removed
Hall	9" Floor Tile	105 Sq. Ft.	Misc	No	Fair	NF	1	Material has been observed to be lifting
Stairwells	9" Floor Tile	196 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with rubber stairtreads
Room 45	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 47	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 48	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 46	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 49	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Janitor Room	9" Floor Tile	72 Sq. Ft.	Misc	No	Fair	NF	1	Materials was observed to have chipped and lifting tiles with
Lobby	9" Floor Tile	196 Sq. Ft.	Misc	No	Fair	NF	1	
Room 42	9" Floor Tile	432 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 43	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 40	9" Floor Tile	432 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 41	9" Floor Tile	441 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Room 44	9" Floor Tile	720 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet
Entrance Rms 44 -42	9" Floor Tile	81 Sq. Ft.	Misc	No	MNO	MNO	1, 6	Material has been covered over with carpet

See notes on following page

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Hall by Mech Room	9" Floor Tile	36 Sq. Ft.	Misc	No	Fair	NF	1	Material was observed to be lifting with some spot replacement tiles.
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assesment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.						4	See further discussion in report. Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Music & Dance								
Music								
Exterior: West Side Music	Corregagated transite siding	800 sq. ft	Misc	No	Good	NF	1	
Dance								
Exterior: North Side	Corregagated transite siding	1,500 sq. ft	Misc	No	Good	NF	1	
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assesment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.						4	See further discussion in report. Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School:3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Payson Science Center								
First Floor								
1st Floor Hall	9" Floor Tile	320 Sq. Ft.	Misc	No	Good	NF	1	
1st Floor Stairwell	9" Floor Tile	100Sq. Ft.	Misc	No	Good	NF	1	
Second Floor								
2nd Floor Hall	9" Floor Tile	500 Sq. Ft.	Misc	No	Good	NF	1	
2nd Floor Stairwell	9" Floor Tile	350 Sq. Ft.	Misc	No	Good	NF	1	Materials was observed to have slight lifting by the door entrance and stair landing
2nd Floor Lobby	9" Floor Tile	800 Sq. Ft.	Misc	No	Good	NF	1	
Third Floor								
3rd Floor Hall	9" Floor Tile	930 Sq. Ft.	Misc	No	Good	NF	1	Materials was observed to have slight lifting throughout
3rd Floor Stairwell	9" Floor Tile	200 Sq. Ft.	Misc	No	Good	NF	1	
3rd Floor Women's Bathroom	9" Floor Tile	12 Sq. Ft.	Misc	No	Good	NF	1	
Attic								
Attic Stairwell	9" Floor Tile	100 sq. ft	Misc	MNO	MNO	MNO	1, 6	Material has been covered over with rubber stairtreads
Attic, Vent Hood	Expansion Cloth	10 lf.	Misc	No	Good	NF	1	
Attic, Fume Hood	Chimney Mud	20 Sq. Ft.	TSI	No	Good	NF	1	
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assessment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.							
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes	
Physical Plant/Maintenance: Site No. 404									
Boiler Room									
Main Basement and Shop									
Main Basement and Shop	Pipe Insulation	-----	TSI	Yes	MNO	MNO	5	Materials were removed by Dec-Tam Corporation in 2006	
	Pipe Fitting Insulation	-----	TSI	Yes	MNO	MNO	5		
Crawlspace									
Crawlspace	Pipe and Pipe Fitting Insulation	-----	TSI	MNO	MNO	MNO	5	Materials were removed by Dec-Tam Corporation in 2006	
Facilities Building									
Facilities Director office (former reception/key office)	Pipe Fitting Insulation	-----	TSI	MNO	MNO	MNO	6	Material was not observed and may be above the sheetrock ceiling or within the wall space	
	Pipe Insulation	-----	TSI	MNO	MNO	MNO	6		
see notes on last page									
maintenance and secretaries offices	Pipe Insulation	-----	TSI	MNO	MNO	MNO	6	Material was not observed and may be above the sheetrock ceiling or within the wall space	
maintenance and secretaries offices	Pipe Fitting Insulation	-----	TSI	MNO	MNO	MNO	6		
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.									
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes									
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.									

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Post Office: Site No. 406								
First Floor								
Post Master Area	9" Floor Tile and associated mastic	690 sq. ft	Misc.	No	Good	NF	1	Approximately 60 sq. ft. of material was removed for a new bathroom by Seacoast Diversified in 2004
Post Master Area	Trowelled-On Surfacing Material	1,477 sq. ft	Misc.	Yes	Good	5	1	Possible inaccessible ACBM also.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and further review is required. See further discussion and requirements in report. testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
School House								
Basement								
Basement Ceiling	Pipe Insulation	-----	TSI	MNO	MNO	MNO	1, 6	Material is located above the sheetrock ceiling
Basement Ceiling	Pipe Fittings	-----	TSI	MNO	MNO	MNO	1,6	
Basement Electrical Room	9" Floor Tile	180 Sq. Ft.	Misc	No	Fair	NF	2	Material was observed to be cracking throughout with missing pieces at entrance and should be removed or repaired as soon as feasible
Basement Mechanical Room	Pipe Insulation	-----	TSI	MNO	MNO	MNO	1,6	Material could not be located
Third Floor								
Room 312 Closet	9" Floor Tile	20 Sq. Ft.	Misc	No	Good	NF	1	
Registrar's Office Closet	9" Floor Tile	30 Sq. ft	Misc	No	Good	NF	1	
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assesment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.						4	See further discussion in report. Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleanings; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Scudder House: Site No. 402								
Basement								
	Pipe Insulation	640 lf	TSI	Yes	Damaged	1	2, 3	Material appears to have had some repairs as newly installed wet wrap is present, however RPF did
	Pipe Fitting Insulation	82 observed	TSI	Yes	Damaged	1	2, 3	observed material with exposed edges and delaminating wrap and should be repaired or removed as soon as feasible.
First Floor								
Kitchen	Linoleum	100 sq. ft	Misc.	MNO	MNO	MNO	5	Materials were removed by
Bathroom	Linoleum	50 sq. ft	Misc.	MNO	MNO	MNO	5	Advanced Building Systems during
Hall to Bathroom	Linoleum	20 sq. ft	Misc.	MNO	MNO	MNO	5	the summer of 2004
Second Floor								
Bathroom	9" Floor Tile	75 sq. ft	Misc.	No	Good	NF	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						4	Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes								
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
Tuck Stores								
Food Storage	Pipe Fitting Insulation	24 Observed	TSI	Yes	Good	5	1	
Mechanical Room	Pipe Fitting Insulation	50 Observed	TSI	Yes	Good	5	1	
Steam Pit and Tunnel	Pipe Cover Insulation	30 linear ft.	TSI	MNO	MNO	MNO	5	Materials were removed by Dec-Tam Corporation during the summer of 2006
Throughout	Other suspect ACBM is present in and on the building that requires further review, testing, assessment and, based on the results modifications to the management plan may be required. In addition, interior and exterior inspection are required prior to any renovation or demolition work.						4	See further discussion in report. Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. Please reference AHERA and the school management plan for discussion on assessment codes. MNO means material was not observed during reinspection. NF Means nonfriable and assessments are not required.								
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
White Farm Garage								
Garage	Transite	-----	Misc.	MNO	MNO	MNO	6	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							Possible inaccessible ACBM also.
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>								

St. Paul's School: 3-Year AHERA Reinspection 2006

Location	ACBM	Approximate Quantity	Category	Friable	Condition	Assessment	Response	Notes
New Chapel: Site 51								
First Floor								
Choir	Flooring Paper	675 sq. ft	Misc	Yes	MNO	MNO	1, 6	Material is located under the wood flooring
Side Entrance near choir	Flooring Paper	100 sq. ft	Misc	MNO	MNO	MNO	1, 6	
Rectory Hall	Flooring Paper	475 sq. ft	Misc	MNO	MNO	MNO	1, 6	
Rectory	Flooring Paper	220 sq. ft	Misc	MNO	MNO	MNO	1, 6	
Side Entrance to Chapel	Transite Board	40 sq. ft	Misc	No	Good	NF	1	
Exterior	Other suspect exterior materials are present and further review is required. Prior to any exterior renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763. Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation ACM; 2. Damaged friable surfacing ACM; 3. Significantly damaged friable surfacing ACM; 4. Damaged or significantly damaged friable miscellaneous ACM; 5. ACM with potential for damage; 6. ACM with potential for significant damage; 7. Any remaining ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference the report, code description sheet, and the school management plan for discussion on assessment codes Response Codes: 1. Manage ACM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACM has been removed and may be removed from listings; 6. ACM was not observed and further review is required. See further discussion and requirements in report.								



November 18, 2007

Mr. Ed Ferman
St. Paul's School
325 Pleasant Street
Concord NH 03301

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Re: Site 407, 469, and 37
Asbestos Inspection

Dear Mr. Ferman:

On October 17, 2007 through November 2, 2007, RPF Associates, Inc. (RPF) performed an AHERA Inspection for the above referenced locations. The site inspections were conducted in accordance with 40 CFR Part 763 (AHERA), and in particular, Part 763.85. The inspection was conducted by Kara Forsythe of RPF Associates, Inc. In accordance with AHERA, below is the required signature section and enclosed are the appropriate accreditation training records.

Inspector: Kara L. Forsythe Date: 11/18/07
Kara Forsythe, NH License Inspector AI00211

Bulk material samples of the accessible suspect materials were extracted and analyzed for asbestos content during the inspection. The inspections included the interior areas for the following buildings: Cow Barn Site 407, Freese Farm Barn Site 469, and Ski Shed Site 37. As reviewed with you, the inspection did not include inaccessible building space or sampling of exterior building materials. The following are the required reporting and findings for the inspection work completed.

Listings of Homogeneous Groups of Suspected ACM Identified, Friability, and AHERA Types

All accessible, portions of the buildings were visually inspected to identify the locations of accessible suspected asbestos-containing building material (ACBM). Suspect ACBM was inspected to determine whether the material is friable or not (in its existing condition at the time of the inspection), and then each homogeneous group of suspected ACBM was categorized as friable or nonfriable. Appendix A includes an inventory of the locations of all homogeneous groups of suspected ACBMs identified and whether the materials are friable.

In addition, a list of possible exterior suspect material present, that will require testing and inspection prior to renovation in accordance with current State and federal regulations, is as follows. Please note that although these building materials are beyond the scope of an AHERA Inspection, the materials are regulated under other State and federal standards. In lieu of proper testing and inspection, the following are example types of exterior materials that should be assumed to be ACBM.

- Caulking compounds
- Roofing, sealants
- Exterior felt paper and certain siding materials

Bulk Material Sampling Inventory

Bulk material sampling was performed in accordance with the protocols established in 40 CFR Part 763.

Appendix A includes a summary of locations where materials were observed, assumed ACBM, and summary of asbestos content for the sample groups analyzed. All samples were collected on October 17, 2007. Sampling methodology was determined in accordance with AHERA. Samples were extracted by the inspector, sealed in sample containers, and labeled in accordance with AHERA and other industry standards for shipment to the laboratory.

Appendix B includes the analytical results for the samples. The samples were analyzed using polarized light microscopy in accordance with AHERA, Appendix A to Subpart F. All PLM analysis on this project was completed by RPF's subcontract laboratory, EMSL Analytical, Inc of Woburn, MA. EMSL is a NVLAP accredited laboratory (NVLAP # 101147-0).

Summary of ACBM and Assumed ACBM Identified:

Based on the inspection and testing results, accessible nonfriable ACBM window glaze was identified on the Cow Barn Site 407. ACBM was not detected in the site 469 and site 37 structures.

As you can see in the analytical results, one homogenous group of window glaze, sample group 101707 HG 102 & 102b, was found to have trace amounts (<1%) of asbestos present. Current definitions for ACBM include material found to contain greater than 1% asbestos content. For friable material, point count methods are performed for confirmation purposes in accordance with US Environmental Protection Agency (EPA) National Emission Standard for Hazardous Air Pollutants (NESHAPs). However, for nonfriable material it is not feasible for the laboratory to conduct standard PLM point count analysis. In addition, PLM analysis, although the method specified in the current regulations, may not be sufficient to detect all asbestos in certain nonfriable material. Therefore, for more definitive results the nonfriable caulking material was submitted for further analysis using transmission electron microscopy (TEM). Based on the TEM analysis, the door caulk was found to contain 3.9% to 6.0% chrysotile asbestos and therefore this material is considered ACBM.

Comments on Nonfriable ACBM and Nonfriable Assumed ACBM

The nonfriable window glaze was found to be in good to fair condition in general and there is approximately 15 windows with 24 linear feet of glaze per window. The material should be classified under AHERA as ACBM with the potential for damage. However, it should be noted that nonfriable ACBM can be rendered friable when subjected to certain forces such as cutting, grinding, sawing, sanding, drilling, high-speed buffing, and other abrasive forces. This is particularly true during demolition or removal of nonfriable ACBM.

General Recommendations

Below are general comments and recommendations to be reviewed and considered by the School for compliance with current State and Federal regulations and industry standards. The comments and recommendations should be reviewed in conjunction with the findings and discussions contained in the text of the report, attachments, and the federal standard, 40 CFR Part 763 and other applicable State and federal standards. Please also reference the AHERA regulation in its entirety for further information on the various requirements.

- All ACBMs must be included in a Management Plan and O&M Program until the materials are completely removed.
- This inspection only included the interior areas of Site 407, 333, and 37. In addition, any new school building areas must either have architectural statements certifying that no ACBM was used in the construction of the buildings or the area must be inspected in accordance with AHERA. Inspections should be performed in accordance with current OSHA and EPA NESHAPs requirements, by properly accredited personnel.
- A general review of the AHERA Plan should be completed periodically to ensure compliance with recordkeeping, training, notification, and other requirements. The Management Plans should be maintained as a dynamic document requiring periodic modifications and revisions.
- Inaccessible ACBMs are or may be present in wall, floor, ceiling, and other spaces not accessible during the inspection. Care should be used during any renovation or demolition work. If suspect materials are encountered, the materials must be properly tested by a MA licensed inspector and, if in fact identified as ACBM, properly abated prior to disturbance. All contractors and other persons working in the building who may come into contact with the ACBM should be properly notified in accordance with current State and federal regulations.
- In accordance with State and federal regulations, ACBM must be abated prior to disturbance due to renovation or demolition activity, or maintenance activity that will result in disturbance to the materials. This work must be properly designed in advance of the planned work and it must be implemented by properly trained, accredited, and/or licensed individuals as applicable.
- It is recommended that sufficient time be allowed prior to any renovation or construction work for the accredited design, review, and impact study to determine abatement work that may be necessitated to facilitate renovation.
- Abatement of non-friable ACBM should be designed and monitored by a qualified/certified consultant. Trained, licensed workers and firms should complete all abatement work. Please note that exterior building materials, such as roofing materials, are often not covered by AHERA, however, they must be properly tested prior to any renovation or demolition. It is recommended that sufficient time be allowed prior to any renovation or construction work for accredited design, review, and impact study to determine abatement work that may be necessitated to

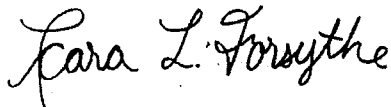
facilitate renovation. It should also be determined that all suspect materials have been properly sampled in the existing reports prior to work.

- O&M level trained employees may be able to perform small scale, short duration maintenance work (<3 linear/square feet) involving asbestos if all applicable state and federal requirements are met and proper medical surveillance, safety equipment and other programs are in place. Any work in excess of 3 feet or work performed for the sole purpose of abating asbestos hazards must be design and performed by licensed personnel and companies.
- All janitorial, custodial, and maintenance staff require a minimum of 2-hour asbestos awareness training and maintenance staff who perform O&M work must also have another 14 hours of training. In accordance with AHERA and OSHA (or EPA Worker Protection Rule), refresher training must also be provided annually.

A general review of the AHERA Plans should be completed periodically to ensure compliance with recordkeeping, training, labeling of ACBM in maintenance areas and as required by OSHA, annual notifications, and other requirements. The school must also complete 6-month surveillance activities in accordance with AHERA. Certain record keeping and notification requirements may still be required regardless of whether new construction has occurred or all ACBMs have been removed.

In accordance with 40 CFR part 763, this report should be used to prepare a management plan for this facility. The management plan must be prepared by an accredited management planner. The documents should be filed with the School's AHERA Files in the school building and the Central office. Based on the limited ACBM identified during this inspection, the fee to revise the current management plan will range from \$200 to \$400. Please contact me at your convenience should you have any questions or if you require further assistance. Thank you for using the services of RPF Associates, Inc.

Sincerely,
RPF ASSOCIATES, INC.



Kara Forsythe
EH&S Consultant, NH-Licensed Inspector

- Appendix A: Homogeneous Material Groups & Summary of Asbestos Content
- Appendix B: ACBM Sampling Results
- Appendix C: General Asbestos Information
- Appendix D: Summary of Methodology and Limitations
- Appendix E: Copies of Inspector Credentials

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APPENDIX A

Appendix A
St. Paul's School
Summary of Suspect Homogeneous Material Identified & Asbestos Content: Interior Areas

Homogeneous Group	Locations	Friable?	AHERA Type	Asbestos Content
Freese Farm Barn Site 469				
<u>Homogeneous Group 1</u> Window Glaze	Throughout window units through the stalls	Nonfriable	Misc. Material	None Detected
Cow Barn Site 407				
<u>Homogeneous Group 100</u> Gypsum Board	Cow barn upper lower partition	<u>Nonfriable</u>	<u>Misc. Material</u>	<u>None Detected</u>
<u>Homogeneous Group 101</u> Plaster with Skim Coat	Cow barn upper wall partition	Friable	Surfacing	None Detected
<u>Homogeneous Group 102</u> Window Glaze	Cow barn throughout window units	Nonfriable	Misc. Material	3.9% -6.0% chrysotile
Ski Shed 37				
No interior suspect materials observed all wood				

Note: Only interior, accessible suspect building materials were included in the inspection in accordance with 40 CFR Part 763. It is possible that inaccessible suspect ACBM is present in areas of the building not inspected by RPF

APPENDIX B



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**St. Paul's School
Site 407 Cow Barn**

**SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS
Polarized Light Microscopy – EPA 600/R-93/116 Method**

Samples Collected: October 17, 2007

Sample ID	Sample Description	Asbestos Content	Other Content
101707 HG 100	Gypsum board, grey, interior lower partition walls, east side	No Asbestos Detected	10% Cellulose, 90% Non-fibrous
101707 HG 100b	Gypsum board, grey, interior lower partition walls, west side	No Asbestos Detected	10% Cellulose, 90% Non-fibrous
101707 HG 100c	Gypsum board, grey, interior lower partition walls, north side	No Asbestos Detected	10% Cellulose, 90% Non-fibrous
101707 HG 101	Plaster with skim coat, grey, interior upper partition walls, north side	No Asbestos Detected	100% Non-fibrous
101707 HG 101b	Plaster with skim coat, grey, interior upper partition walls, south side	No Asbestos Detected	100% Non-fibrous
101707 HG 101c	Plaster with skim coat, grey, interior upper partition walls, west side	No Asbestos Detected	100% Non-fibrous
101707 HG 102	Window glaze, grey, north side window units	Trace Chrysotile	100% Non-fibrous
101707 HG 102b	Window glaze, grey, south side window units	Trace Chrysotile	100% Non-fibrous

06.2268 101707 bulk

- Trace means less than 1%. SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample during the survey work. Please reference the "HG" group number.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.
- Recent studies have shown that PLM analysis, although the method specified in various regulations for asbestos in bulk samples, may not be sensitive enough to detect asbestos fibers in certain nonfriable material such a floor tile. For confirmation analysis of such nonfriable material found to have trace amounts or no asbestos detected, RPF recommends the use of transmission electron microscopy.
- Vermiculite is a known problem matrix, negative results cannot be guaranteed. Conventional TEM method analysis w/CARB 435 milling prep is recommended for proper quantification of asbestos in vermiculite.
- For samples of friable material found to contain trace amount of asbestos, the EPA requires point count method analysis to confirm the quantity of asbestos detected in the sample or such material should be assumed to be asbestos-containing material. For samples of friable material found to contain 1% up to 10% asbestos the EPA also requires point count method or, as often is the case, such materials is assumed to be asbestos-containing material.



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Asbestos & Lead Management

**St. Paul's School
Site 333 Freese Farm Barn**

**SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS
Polarized Light Microscopy – EPA 600/R-93/116 Method**

Samples Collected: October 17, 2007

Sample ID	Sample Description	Asbestos Content	Other Content
101707 HG 1	Window glaze, tan, interior door entrance divider wall	No Asbestos Detected	100% Non-fibrous
101707 HG 1b	Window glaze, tan, interior door entrance divider wall	No Asbestos Detected	100% Non-fibrous

06.2268 101707 bulk freese farm

- Trace means less than 1%. SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample during the survey work. Please reference the "HG" group number.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.
- Recent studies have shown that PLM analysis, although the method specified in various regulations for asbestos in bulk samples, may not be sensitive enough to detect asbestos fibers in certain nonfriable material such a floor tile. For confirmation analysis of such nonfriable material found to have trace amounts or no asbestos detected, RPF recommends the use of transmission electron microscopy.
- Vermiculite is a known problem matrix, negative results cannot be guaranteed. Conventional TEM method analysis w/CARB 435 milling prep is recommended for proper quantification of asbestos in vermiculite.
- For samples of friable material found to contain trace amount of asbestos, the EPA requires point count method analysis to confirm the quantity of asbestos detected in the sample or such material should be assumed to be asbestos-containing material. For samples of friable material found to contain 1% up to 10% asbestos the EPA also requires point count method or, as often is the case, such materials is assumed to be asbestos-containing material.



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**St. Paul's School
Site 407 Cow Barn**

TRANSMISSION ELECTRON MICROSCOPY ANALYSIS

Samples Collected: October 17, 2007

Sample ID	Sample Description	Asbestos Content	Other Content
101707 HG 102	Window glaze, grey, north side window units	6.0% Asbestos	94% Non-fibrous
101707 HG 102b	Window glaze, grey, south side window units	3.9% Asbestos	96.1 Non-fibrous

06.2268 101707 TEM tables

Notes: Samples analyzed by RPF Associates, Inc. vendor laboratory, EMSL Analytical, Inc. of Woburn, MA.
Please refer to full report for further information.



EMSL Analytical, Inc.

7 Constitution Way, Suite 107, Woburn, MA 01801

Phone: (781) 933-8411 Fax: (781) 933-8412 Email: bostonlab@emsl.com

Attn: **Kara Forsythe**
RPF Associates
320 First NH Turnpike
Northwood, NH 03261

Customer ID: RPFA50
Customer PO:
Received: 10/22/07 9:45 AM
EMSL Order: 130704013

EMSL Proj:
Analysis Date: 10/24/2007
Report Date: 10/24/2007

Fax: (603) 942-5300 Phone: (603) 942-5432
Project: **Not Given / SPS: Cow Barn/Freese Farm**

Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Location	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
101707HG1 130704013-0001	Window Glaze	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
101707HG1b 130704013-0002	Window Glaze	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
101707HG100 130704013-0003	GB	Tan/White Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	None Detected
101707HG100b 130704013-0004	GB	Tan/White Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	None Detected
101707HG100c 130704013-0005	GB	Tan/White Fibrous Heterogeneous	10% Cellulose	90% Non-fibrous (other)	None Detected
101707HG101 130704013-0006	Plaster/Skim Coats	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
101707HG101b 130704013-0007	Plaster/Skim Coats	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected
101707HG101c 130704013-0008	Plaster/Skim Coats	White Non-Fibrous Homogeneous		100% Non-fibrous (other)	None Detected

Analyst(s)

Kevin Pine (10)

Todd Nardozzi, Laboratory Manager
or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. Samples reported as <1% or none detected may require additional testing by TEM to confirm asbestos quantities. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of EMSL Analytical, Inc. EMSL's liability is limited to the cost of analysis. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. Samples received in good condition unless otherwise noted.
Analysis performed by EMSL Boston NVLAP# 101147-0 MA# AA000188



EMSL Analytical, Inc.

7 Constitution Way, Suite 107, Woburn, MA 01801

Phone: (781) 933-8411 Fax: (781) 933-8412 Email: bostonlab@emsl.com

Attn: **Kara Forsythe**
RPF Associates
320 First NH Turnpike
Northwood, NH 03261

Fax: (603) 942-5300 Phone: (603) 942-5432
Project: **Not Given / SPS: Cow Barn/Freese Farm**

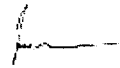
Customer ID: RPFA50
Customer PO:
Received: 10/22/07 9:45 AM
EMSL Order: 130704013
EMSL Proj:
Analysis Date: 10/24/2007
Report Date: 10/24/2007

Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Location	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
101707HG102 130704013-0009	Window Glaze	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	<1% Chrysotile
101707HG102b 130704013-0010	Window Glaze	Gray Non-Fibrous Homogeneous		100% Non-fibrous (other)	<1% Chrysotile

Analyst(s)

Kevin Pine (10)



Todd Nardozzi, Laboratory Manager
or other approved signatory

Due to magnification limitations inherent in PLM, asbestos fibers in dimensions below the resolution capability of PLM may not be detected. Samples reported as <1% or none detected may require additional testing by TEM to confirm asbestos quantities. The above test report relates only to the items tested and may not be reproduced in any form without the express written approval of EMSL Analytical, Inc. EMSL's liability is limited to the cost of analysis. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. Samples received in good condition unless otherwise noted.
Analysis performed by EMSL Boston NVLAP# 101147-0 MA# AA000188



EMSL Analytical, Inc.

7 Constitution Way, Suite 107, Woburn, MA 01801

Phone: (781) 933-8411 Fax: (781) 933-8412 Email: bostonlab@emsl.com

Attn: **Kara Forsythe**
RPF Associates
320 First NH Turnpike
Northwood, NH 03261

Fax: (603) 942-5300 Phone: (603) 942-5432
Project: **Not Given / SPS: Cow Barn/Freese Farm**

Customer ID: RPF A50
Customer PO:
Received: 10/22/07 9:45 AM
EMSL Order: 130704013

EMSL Proj:
Analysis Date: 10/30/2007
Report Date: 10/31/2007

Asbestos Analysis of Non-Friable Organically Bound Materials by TEM via EPA/600/R-93/116 Section 2.5.5.1

SAMPLE ID	DESCRIPTION	APPEARANCE	% MATRIX MATERIAL	% NON-ASBESTOS FIBERS	ASBESTOS TYPES	% TOTAL ASBESTOS
101707HG102 130704013-0009	Window Glaze	Gray Non-Fibrous Homogeneous	94.0	None	6.0% Chrysotile	6.0
101707HG102b 130704013-0010	Window Glaze	Gray Non-Fibrous Homogeneous	96.1	None	3.9% Chrysotile	3.9

Analyst(s)

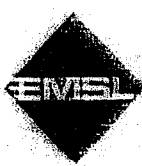
Todd Nardozzi (2)

Todd Nardozzi, Laboratory Manager
or other approved signatory

This laboratory is not responsible for % asbestos in total sample when the residue only is submitted for analysis. The above report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. Samples received in good condition unless otherwise noted.

PLMEPANOB-228-1

THIS IS THE LAST PAGE OF THE REPORT.



EMSL - MA
7 Constitution Way, Suite 107
Woburn, MA 01801
(781) 933-8411
(781) 933-8412 Fax

EMSL - CT
4 Fairfield Blvd.
Wallingford, CT 06492
(203) 284-5948
(203) 284-5978 Fax

EMSL - NY
307 West 38th Street
New York, NY 10018
(866) 448-3675
(212) 290-0058 Fax

EMSL - NJ
107 Haddon Avenue
Westmont, NJ 08108
(800) 220-3675
(856) 858-4960 Fax

Your Name: Kara Forsythe Project Manager: KF
 Company: RPF Associates, Inc.
 Street: 320 First NH Turnpike
 City/State/Zip: Northwood, NH 03261
 Phone: 603-942-5432 Fax: 603-942-5300 Email: safear@airpf.com
 Project Name: SPS Project #: _____
 Project Location: Cow Barn / Freeze Farm Project State (US): NH

TURNAROUND TIME

- 3 Hours 6 Hours 12 Hours 24 Hours 48 Hours 72 Hours 4 Days 5 Days 6-10 Days

SAMPLE MATRIX

- Air Bulk Soil Wipe Micro-Vac Drinking Water Wastewater Chips Other

ASBESTOS ANALYSIS

PCM - Air
 NIOSH 7400 (A) Issue 2: August 1994
 OSHA w/TWA

TEM AIR
 AHERA 40 CFR, Part 763 Subpart E
 NIOSH 7402 Issue 2
 EPA Level II

PLM - Bulk
 EPA 600/R-93/116
 NY Stratified Point Count
 California Air Resource Board (CARB) 435
 NIOSH 9002
 Pumping Gravimetric NY 988-1

EPA Point Count (400 Points)
 EPA Point Count (1,000 Points)
 Standard Addition Point Count

SOILS
 EPA Protocol Qualitative
 EPA Protocol Quantitative
 EMSL MSD 9000 Method fibers/gram
 Superfund EPA 540-R097-028 (dust generation)

TEM BULK
 Drop Mount (Qualitative)
 Chatfield SOP-1988-02
 TEM NOB (Gravimetric) NY 198.4

TEM MICROVAC
 ASTM D 5755-95 (Quantitative)

TEM WIPE
 ASTM D-6480-99
 Qualitative

TEM WATER
 EPA-100.1
 EPA-100.2
 NYS-198.2
 Other

LEAD ANALYSIS

Flame Atomic Absorption
 Wipe, SW846-7420 ASTM non ASTM
 Soil, SW846-7420
 Air, NIOSH 7082
 Chips, SW846-7420 or AOAC 5:009 (974.02)
 Wastewater, SW 846-7420
 TCLP LEAD SW846-1311/7420

Graphite Furnace Atomic Absorption
 Air, NIOSH 7105
 Wastewater, SW846-7421
 Soil, SW846-7421
 Drinking Water, EPA 239.2

ICP - Inductively Coupled Plasma
 Wipe, SW846-6010 ASTM non ASTM
 Soil, SW846-6010
 Air, NIOSH 7300

MATERIALS ANALYSIS

Full Particle Identification
 Optical Particle Identification
 Dust Mines and Insect Fragments
 Particle Size & Distribution
 Product Comparison
 Paint Characterization
 Failure Analysis
 Corrosion Analysis
 Glove Box Containment Study
 Petrographic Examination of Concrete
 Portland Cement in Workplace Atmospheres (OSHA ID-143)
 Man Made Vitrous Fibers - MMVF's
 Synthetic Fiber Identification
 Other

MICROBIAL ANALYSIS

Air Samples
 Mold & Fungi by Air O Cell
 Mold & Fungi by Agar Plate count & id
 Bacterial Count and Gram Stain
 Bacterial Count and Identification

Water Samples
 Total Coliforms, Faecal Coliforms
 Escherichia Coli, Faecal Streptococcus
 Legionella
 Salmonella
 Giardia and Cryptosporidium

Wipe and Bulk Samples
 Mold & Fungi - Direct Examination
 Mold & Fungi - Culture follow up to direct examination if necessary)
 Mold & Fungi - Culture (Count & ID)
 Mold & Fungi - Culture (Count only)
 Bacterial Count & Gram Stain
 Bacterial Count & Identification (3 most prominent types)
 Other

IAQ ANALYSIS

Nuisance Dust (NIOSH 0500 & 0600)
 Airborne Dust (PM10, TSP)
 Silica Analysis by XRD Niosh 7500
 HVAC Efficiency
 Carbon Black
 Airborne Oil Mist
 Other

Additional Information/Comments/Instructions: _____

Client Sample # (S) 101707HG-1 101707HG-102 TOTAL SAMPLE # 103

Relinquished: _____ Date: _____ Time: _____
 Received: _____ Date: _____ Time: _____
 Relinquished: _____ Date: _____ Time: _____
 Received: _____ Date: _____ Time: _____

RECEIVED

OCT 22 2007

By: OSIUS KFO



EMSL - MA
 7 Constitution Way, Suite 107
 Woburn, MA 01801
 (781) 933-8411
 (781) 933-8412 Fax

EMSL - CT
 4 Fairfield Blvd.
 Wallingford, CT 06492
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 (203) 284-5978 Fax

EMSL - NY
 307 West 38th Street
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 (866) 448-3675
 (212) 290-0058 Fax

EMSL - NJ
 107 Haddon Avenue
 Westmont, NJ 08108
 (800) 220-3675
 (856) 858-4960 Fax

18070401

SAMPLE NUMBER	SAMPLE DESCRIPTION/LOCATION	VOLUME Air (L)	Area (inches sq.)
101707 H6 1	Window Glaze (Presse farm)		
1b	↓		
100	Gyp-board (Caw barn)		
100b			
100c			
101	Plaster / skam coats		
101b	↓		
101c	↓		
102	Window Glaze		
102b	↓		

SFP - Stop at first positive per homogenous group.
 *All samples to be composite analysis unless otherwise specified per HG

Relinquished: _____ Date: _____ Time: _____
 Received: _____ Date: _____ Time: _____
 Relinquished: _____ Date: _____ Time: _____
 Received: _____ Date: _____ Time: _____

RECEIVED
 OCT 22 2007
 By 0940 rd

APPENDIX C

INDUSTRY AND REGULATORY OVERVIEW

General Overview

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.

Asbestos-containing building material (ACBM) that is in good condition, and is not damaged or otherwise disturbed, is not likely release asbestos fibers into the air if it is managed properly. When properly managed, release of asbestos fibers into the air or surrounding areas is prevented or minimized, and the risk of asbestos-related disease can be reduced to a negligible level. However, ACBM can become hazardous when, due to damage, disturbance, or deterioration over time, they release fibers into the air. In the event of fiber release without proper controls, elevated airborne concentrations of asbestos create a potential hazard for any employees and building occupants in the affected areas.

ACBM is classified by the different regulatory agencies based on friability. Friable ACBM, when dry, can be crumbled, pulverized, or reduces to powder by hand pressure. Considering that a primary concern when dealing with ACBM is airborne fibers or the potential for exposure to airborne fibers, friable ACBM is typically considered to present more of a health risk as compared with nonfriable ACBM. Nonfriable ACBM is further grouped by the EPA into Category I and Category II nonfriable ACBMS depending on the specific type of ACM. It should be noted that nonfriable ACBM that is rendered friable, or in some cases, subjected to certain activities and forces during work, may also be considered regulated as friable ACBM.

Health Issues

The three primary diseases most often related to asbestos exposure are asbestosis, mesothelioma, and lung cancer. Asbestosis is a fibrous scarring of the lung caused by scar tissue formations in the lung in response to the asbestos fibers. Mesothelioma is a rare cancer of the lining of the lungs or the lining of the abdomen. Exposure to all types of asbestos increases the risk of developing lung cancer and asbestosis. Other diseases found more often among persons exposed to asbestos include cancer of the esophagus, stomach, colon, and pancreas; pleural plaques and pleural thickening; and pleural effusion.

Exposure to airborne asbestos rarely causes immediate health problems. The diseases related to asbestos may develop over a period of 10 to 30 years. Studies have shown that there is dose-response relationship between exposure to asbestos and disease -or the more asbestos inhaled over an extended period, the greater the risk of developing an asbestos-related disease. Smoking, in combination with asbestos exposure, can increase the risk of disease by 50 percent.

Regulatory Overview

Asbestos is highly regulated at the federal, state, and local levels. To date, the two primary Federal agencies responsible for generating asbestos-related regulations are the U.S. Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). Additionally, regulations regarding asbestos vary from state-to-state and, in some cases, locally.

Regulations promulgated by the Environmental Protection Agency (EPA) include:

Asbestos Abatement Projects; Worker Protection Rule
Title 40 Part 763, Sub-part G of the Code of Federal Regulations

Asbestos School Hazard Abatement Reauthorization Act (ASHARA)
Training Requirements of (AHERA) Regulation
Asbestos Containing Materials in Schools Final Rule & Notice
Title 40, Part 763, Sub-part E, Code of Federal Regulations

Asbestos Hazard Emergency Response Act (AHERA) Regulation
Asbestos Containing Materials in Schools Final Rule & Notice
Title 40, Part 763, Sub-part E of the Code of Federal Regulations

National Emission Standard for Hazardous Air Pollutants (NESHAPS)
National Emission Standard for Asbestos, Title 40, Part 61, Sub-part A,
and Sub-part M (Revised Sub-part B) of the Code of Federal Regulations

The US Occupational Safety and Health Administration (OSHA) has also developed regulations for asbestos (abatement and related issues) including:

Occupational Exposure to Asbestos, Tremolite,
Anthophyllite, and Actinolite; Final Rules

Title 29, Part 1910, Section 1001 and
Part 1926, Section 1101 of the Code of Federal Regulations

Respiratory Protection
Title 29, Part 1910, Section 134 of the Code of Federal Regulations
Other related sections of 29 CFR 1926 and 29 CFR 1910

Individual state agencies must also be consulted for current updated copies of state rules and regulations. Regulations and requirements can vary significantly from state to state.

In summary, based on current regulatory requirements, ACBM, which 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. ACBM, which will not be impacted or disturbed by renovation or demolition activity, may be left in place if managed properly and if the materials are maintained in good condition. A qualified, licensed project designer and certified industrial hygienist must design abatement work. All abatement should be monitored, tested, and inspected by a qualified EH&S firm/certified industrial hygienist. ACBM that will not be impacted or disturbed by renovation or demolition activity may be left in place if managed properly and if the materials are maintained in good condition.

APPENDIX D

SUMMARY OF METHODOLOGY – AHERA SURVEY

Asbestos

An EPA accredited inspector surveyed the areas as specifically designated in the Survey Report in accordance with 40 CFR Part 763 (AHERA). 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. Collected samples were placed into containers, labeled, and submitted for analysis to determine asbestos content.

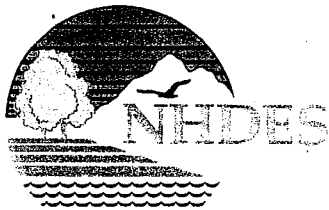
Unless otherwise stated in the Survey Report and if sample collection and analysis was included in the scope of services, standard laboratory analysis was conducted using polarized light microscopy (PLM). Although PLM is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, some industry studies have found that PLM may not be sensitive enough to detect all of the asbestos fibers in certain types of materials, such as floor tile. In the event that more definitive results are requested, RPF recommends that confirmation testing be completed using transmission electron microscopy.

Inaccessible areas, such as building space behind walls and floors were not included in the inspection and care should be used when accessing these areas during demolition. In the event that additional suspect materials are encountered, the materials should be properly tested by an accredited inspector. Please also reference the discussions and findings for additional notes on the inspection methods used during this inspection. In addition, AHERA does not cover roofing and other exterior suspect materials in many cases; however, these materials may contain asbestos and are regulated under other state and federal regulations. Further survey work will be required prior to engaging in renovation or demolition activity at this site.

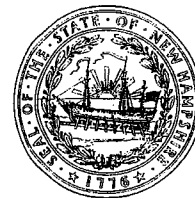
SURVEY LIMITATIONS: PRELIMINARY OR LIMITED ACBM

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 scope of services as discussed in the proposal and text of the report. 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 initial survey service was preliminary and limited as indicated herein and in the report letter of findings. Further testing, survey, and analysis is required to provide more definitive results and findings. As applicable, 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.
2. 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 ACBM 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. Asbestos or suspect material may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition proceeds.
3. Although some preliminary assumptions may have been stated regarding the potential presence of inaccessible or hidden ACBM, a full inspection for all ACBM or a destructive inspection for possible inaccessible suspect ACBM was not conducted. The ACBM spot testing was limited and a full inspection for all ACBM and suspect ACBM was not conducted. Only the specific areas and /or materials indicated in the report were included in the scope of services. This inspection did not include a hazard assessment survey, full testing or bulk material, or testing to determine current dust concentrations of asbestos in and around the building. The survey was limited to ACBM as indicated herein 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 initial site inspection.
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 site inspection. Interiors of mechanical equipment and other building or process equipment may also have ACBM gaskets or insulation present and were not included in this inspection. Further inspections would likely be required prior to renovation or demolition activity.
5. For air sampling, please note that the testing completed 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. For PCM total airborne fiber testing, more sensitive, asbestos-specific analysis can be performed using transmission electron microscopy (TEM) upon request.
6. 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.
7. 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 scope of services to provided.
8. Results presented in the report area limited to the materials and conditions present at the time that the site inspection was actually performed by RPF. The applicability of the observations and recommendations presented in this report to other portions of the site were not determined as part of this scope of work. 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 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. For example, during construction changes it is possible that previously inaccessible suspect material may be encountered. As such, the contractors, employers OSHA-competent persons, and other affected staff should be advised of the possible presence of inaccessible ACBM and suspect ACBM. In the event that newly identified suspect material is encountered, please contact RPF to arrange for proper inspection, assessment and testing as applicable.
9. Typically, hazardous building materials such as asbestos, lead paint, PCBs, mercury, refrigerants, hydraulic fluids and other materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the report. In general it is recommended that surveys for all accessible hazardous building material be performed. Notify RPF to arrange for additional survey work as needed.

APPENDIX E



The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

15-October-2007

KARA FORSYTHE
RPF ASSOCIATES, INC.
320 FIRST NH TURNPIKE
NORTHWOOD NH 03261

RECEIVED
10/17

Re: New Hampshire certification for Asbestos Inspector (#AI 000211).

Dear Ms. Forsythe:

Your application for certification as an Asbestos Inspector has been approved. Attached please find the referenced certificate.

This certificate is valid until the expiration date shown and for only those disciplines noted in the certificate number. You are responsible for contacting this office for renewal of your certificate prior to the expiration of this certification.

All applicable asbestos rules and regulations for the State of New Hampshire must be adhered to.

If you have any questions, please feel free to contact me at (603) 271-4609.

Sincerely,

Joy EH Perkins
Industrial Hygienist
Asbestos Management & Control Program
Air Resources Division

STATE OF NEW HAMPSHIRE
Department of Environmental Services
Asbestos Management & Control Program

ASBESTOS Inspector

Kara L Forsythe

; as a carrier for mailing your card to you.



DOB: 10-19-1978

Eff. Date: 10/27/07

Exp. Date: 10/26/08

R

AI 000211

Robert Scott, Director
Air Resources Division

RPF ASSOCIATES, INC.

320 First NH Turnpike, Northwood, NH 03261 (603) 942-5432

Class Location: Northwood, NH

This is to certify that

Kara Forsythe

*has completed the requisite training and
has passed an examination for accreditation as:*

Asbestos Inspector - Annual Refresher

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

April 13, 2007

Course Date

April 13, 2008


Expiration Date

April 13, 2007

Examination Date

07.2452-03-101978

Certificate Number/DOB


Dennis N. Francoeur – Instructor

Kara Forsythe

Environmental Health and Safety Professional

SUMMARY OF EXPERIENCE

Ms. Haley has been working with RPF Associates, Inc. since May 2000, under the supervision of a CSP, CIH, licensed asbestos inspectors, management planner and project designer. Her responsibilities include preparation of power point presentations for Hazwoper safety and health training, data entry for analytical reporting, industrial hygiene technician monitoring, asbestos inspector, and site supervision tasks at various construction sites, PCM air sample analysis and indoor air quality surveys. Ms. Haley is licensed for asbestos work in NH, MA, NY and Maine.

EXPERIENCE

Ms. Haley is currently an environmental, health and safety specialist for regional clients. Duties include Indoor air quality surveys and assessments; lead clearance technician, asbestos abatement project monitoring; performing asbestos NESHAP surveys and AHERA reinspections; client safety and health training.

While in college Ms. Haley participated in the following organizations: American Society of Safety Engineers Student Section, Vice-President and Public Relations; Organized student leadership conference, safety speakers, and other Safety related Meetings. Kept minutes and attendance for meetings and activities. While serving as Vice President of the Student Section of ASSE, Keene State College awarded the group with an Outstanding Academic Organization Award. The National ASSE also awarded the organization with the Mine, Safety & Appliance award for Outstanding Student Section throughout the United States; Eta Gamma Chi Sorority, Vice President, Treasurer, and Public Relations

EDUCATION

Keene State College, Bachelors of Science Degree-Occupational Safety and Health, May, 2001
Keene State College, Bachelors of Science Degree-Management, May 2001

CERTIFICATIONS

Warrington Radiation Safety January 23, 2003
Mold Remediation Course, November 1, 2002
Fork Lift Training, October, 29, 2002
Asbestos Disposal Site Worker Training-HeP-5013, June 13, 2002
Radiation Safety-XRF Portable Gages, April 25, 2002
Lead Inspector and Risk Assessor Initial Course, February 18-22,2002
Lead Clearance Technician, December 7, 2001
Asbestos Inspector Initial Course, September 10-12, 2001
(Refresher completed 8/26/02, 4/29/03 4/21/04, 4/21/05)
Basic Observation Course Management February 1997

Kara Forsythe

Kara Haley (cont)

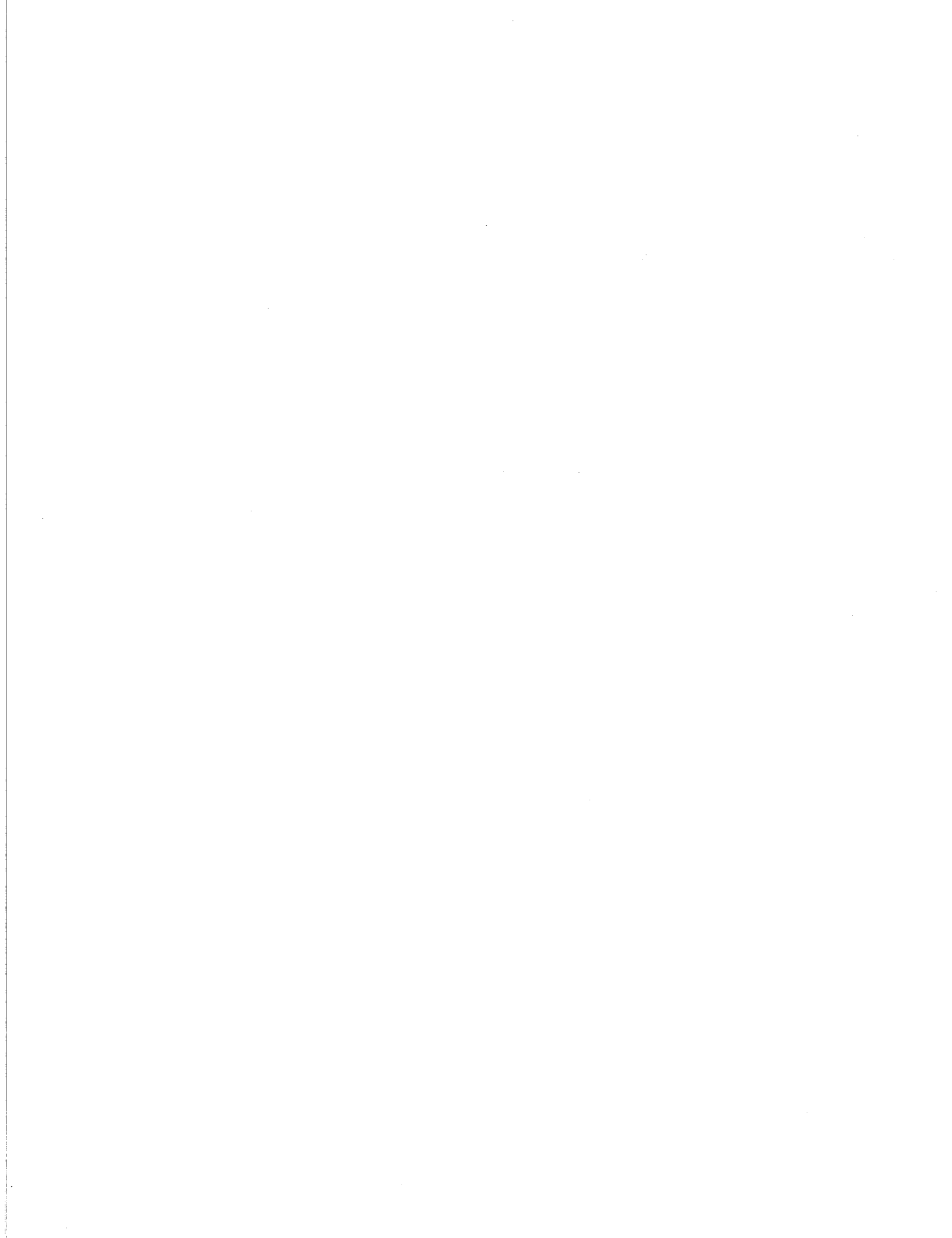
Serve Safe Food Safety February 1997
Leadership and Team Building November 1999
American Blood Born Pathogens April 2000
Permit Confined Space May 2000
Asbestos Awareness July 2000
OSHA 501 Certification December 2000
Confined Space Entry Training – May 2000

PROFESSIONAL ACTIVITIES:

American Society of Safety Engineers (ASSE) / Greater Boston Chapter – Board of Directors,
Membership Committee Chair, 2001-2003
Treasurer, 2003-2005, Vice President of Finance 2005-present
New England Area American Society of Safety Engineers (NEAASSE)-PDC Committee
Member
2002-2004
New Hampshire Health and Safety Council

AWARDS RECEIVED:

Nominated for Outstanding Keene State College Junior 2000
Received Outstanding Executive Board Member ASSE 2001
Received Keene State College Senior Service award 2001
Nominated for Outstanding Keene State College Senior 2001
Received SIMS Safety Leadership Award 2001
ASSE Greater Boston Member of the Month July 2002
ASSE Greater Boston Member of the Month December 2002
ASSE Greater Boston Member of the Month September 2003





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ST. PAUL'S SCHOOL
2007 ASBESTOS 3 YEAR REINSPECTION
Faculty Residences

Prepared by:
RPF ASSOCIATES, INC.
320 First NH Turnpike
Northwood, NH 03261
603-942-5432

Introduction

RPF Associates, Inc. (RPF) conducted asbestos reinspection work for the St. Paul's School (SPS) located in Concord, New Hampshire during the period of September 28 through October 18, 2007. The Faculty residential buildings included in this phase of the reinspection work consisted of: Site 234, Site 330, Site 331, Site 329, Site 242, Site 255, Site 254, Site 289, Site 259, Site 261, Site 249, Site 229, Site 303, Site 327, Old Miller house Sites 243-246, Site 248, and Site 228.

The subsequent associated management planner review and assessment work was performed during this period as well. The reinspection work was completed in accordance with Part 763.85 (b) of 40 CFR Part 763, Subpart E - Asbestos Hazard Emergency Response Act (AHERA). As we reviewed, the scope-of-services for the reinspection included a visual inspection of the areas known to contain asbestos-containing building materials (ACBM) and assumed ACBM, which was documented, as of the time of this reinspection, in the above referenced buildings as stated in the AHERA inspection records provided to RPF for review.

Reinspection Methods

All accessible ACBM which were identified in the existing AHERA reports were visually reinspected in accordance with AHERA, to (a) observe whether the materials are friable, (b) observe the conditions of the ACBM and potential for disturbance, and (c) to assess the hazard potential of the ACBM. Documentation review consisted of only those specific documents which list ACBM and which were provided by the School to RPF for review. A full review or audit of the AHERA Plans for each building, including abatement records, other record keeping requirements, or AHERA implementation records was not completed as part of this service.

Please note that this reinspection report is intended to comply with the federal regulation and the report should not be considered or referenced as a detailed full, initial AHERA room-by-room inspection. Please also reference the initial 1988 AHERA Inspection Report prepared for the building by AOHS, subsequent update reinspection records prepared by RPF, and 6-month surveillance update reports prepared by the School's Program Manager. This reinspection does not meet the requirements for full inspections prior to renovation or demolition activity.

A full inspection (for confirmation of previous inspection results) was also not completed during this project. In the event that other readily accessible suspect materials were observed by the inspector during the course of the reinspections (materials that may have been missed during the initial inspection or may require confirmation testing), the inspector provide preliminary notation on the reinspection reports to make the School aware that additional inspection or review may be required; however, in accordance with the AHERA reinspection requirements, the inspector did not conduct full initial inspection during the course of the reinspection work.


Signatures

The reinspection work and management planning was completed by Kara Forsythe and Roger Francoeur of RPF Associates, Inc.

Accredited Inspectors


Kara L. Forsythe, NH AI000211 Exp. 10/24/08

Accredited Inspector/Management Planner


Roger Francoeur, NH AM00025, Exp. 08/31/08

Assessments and Recommendations

Attachment 1 includes general comments and preliminary recommendations for compliance with AHERA that need to be reviewed and considered by the School. Attachment 2 contains a listing of the ACBMs reinspected during this project and the AHERA assessment and minimum responses for each area of ACBM. For areas with damaged ACBM listed, care must be used to prevent further disturbance and to avoid the creation of dust. Areas with damaged material should also be prioritized for abatement work.

It is recommended that a preliminary audit of the AHERA files and recordkeeping procedures and policies in general be performed as needed to ensure future compliance with 40 CFR Part 763 and other applicable state and federal regulations.

The report findings and recommendations should be reviewed by the School's designated asbestos coordinator and a plan for implementation should be prepared, as applicable. Any ACBM maintenance or repair activity must be conducted by accredited personnel using proper personal protective equipment. Properly accredited personnel and certified laboratories must conduct all ACBM testing. Response actions, as defined by AHERA, must be detailed in a specification (project design) prepared by a license asbestos abatement project designer in accordance with AHERA and NH Admn. Rule He-P 5000. Finally, properly licensed personnel and contractors must carry out response actions and the work must be monitored/tested by a qualified environmental testing firm.

The School must continue with their ACBM surveillance activity every 6 months, training of maintenance and custodial staff, annual notifications, labeling and other Management Plan items. *A copy of this report must be filed in the School central office.* If you have any questions or comments, or if you would like assistance with the recommendations provided herein, please do not hesitate to contact our office.

Other General Recommendations and Comments

Below are other general comments and recommendations to be reviewed and considered by the School for compliance with current State and Federal regulations and industry standards. The comments and recommendations should be reviewed in conjunction with the findings and discussions contained in the text of the report, attachments, and the federal standard, 40 CFR Part 763 and other applicable State and federal standards.

- The 1988 initial AHERA reports should be reviewed for detailed initial inspection results, Management Plan and O&M Plan requirements, analytical data, and other related documentation. Except as otherwise noted the reinspection work only included ACBM identified in the inspection reports provided to RPF by the School. During the reinspection, initial inspections, abatement documentation and other record keeping items were not completely reviewed or audited for accuracy and completeness. This type of review was beyond the scope of services for the project. Based on the RPF preliminary review of the records provided to RPF, it is our opinion that the AHERA Plans may not address all of the possible ACBM present. For example, although not directly regulated by AHERA, various exterior suspect materials are present as well as hidden interior ACBM in some locations.
- This reinspection only included the school buildings designated in the RPF listing. Other buildings used as school buildings in accordance with 40 CFR Part 763 still require reinspection as reviewed with the School and this additional work will be scheduled by the School as soon as feasible. For any new buildings or renovated space, obtain architectural statements for new construction/renovation areas in accordance with AHERA certifying no asbestos was specified or used.
- All ACBMs must be included in the Management Plan and O&M Program until the materials are completely removed. The ACBM listings in the Reports should be reviewed and updated periodically to reflect all abatement work, any testing performed, and all O&M Program maintenance or repair activity completed. Examples of activity that must be documented include but are not limited to the following: covering area of ACBM tile with carpet or other newer flooring; installation of other new building materials - certification of asbestos-free material must be obtained and filed; any sampling and testing; any spot asbestos repairs or removal work; personnel training; annual notifications; and other activities.
- Materials listed as MNO (materials not observed) should be reviewed further by the Program Manager to determine if in fact such materials were abated, if abatement records are on file, and/or, if the areas were not accessible that such materials be inspected when the areas can be accessed. ACBM assumed to be enclosed should continue to be documented as such for future renovations/demolition issues. Please note that new enclosures are a form of abatement and are subject to the requirements of AHERA as a response action.

- Inaccessible ACBMs are or may be present in wall, floor, ceiling, and other spaces not accessible during the inspection. Care should be used during any renovation or demolition work. If suspect materials are encountered, the materials must be properly tested by a NH licensed inspector and, if in fact identified as ACBM, properly abated prior to disturbance. All contractors and other persons working in the building who may come into contact with the ACBM should be properly notified in accordance with current State and federal regulations.
- Certain types of floor maintenance activities can result in release of asbestos fibers. Proper cleaning, stripping, and finishing methods should be used as recommended by the State of NH and U.S.E.P.A. guidelines. Depending on the condition of various non-friable ACBMs and the specific action/disturbance to the material (i.e., chipping of flooring during removal, cutting and abrasive activities, or sanding/scraping of adhesives), non-friable ACBM can be rendered friable. This is particularly true with flooring materials that are aged, thin, brittle, or have prolonged water damage.
- Flooring mastic, along with any floor tile or linoleum that is ACBM was or may have been assumed to be ACBM, should continue to be classified as ACBM and properly tested prior to any flooring removal work, as applicable. It should be noted that a recent EPA advisory statement recommends that flooring which was previously tested as asbestos free be confirmed using electron microscopy prior to any removal or other activities that may result in the disturbance of the flooring.
- All assumed ACBM should be properly tested by a licensed inspection firm, prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. This type of testing *should not* be conducted by asbestos abatement contractors, but by a qualified licensed consulting/laboratory firm.
- In accordance with State and federal regulations, ACBM must be abated prior to disturbance due to renovation or demolition activity, or maintenance activity that will result in disturbance to the materials. This work must be properly designed in advance of the planned work and it must be implemented by properly trained, accredited, and/or licensed individuals as applicable.
- Abatement of friable and non-friable ACBM should be designed by, and monitored by, a qualified/certified consultant. Trained, licensed workers and firms should complete all abatement work. Please note that exterior building materials, such as roofing materials, were often not included in the initial inspection work and should be properly tested prior to any renovation or demolition. It is recommended that sufficient time be allowed prior to any renovation or construction work for accredited design, review, and impact study to determine abatement work that may be necessitated to facilitate renovation. It should also be determined that all suspect materials have been properly sampled in the existing reports prior to work.

- O&M level trained employees may be able to perform small scale, short duration maintenance work (<3 linear/square feet) involving asbestos if all applicable state and federal requirements are met and proper medical surveillance, safety equipment and other programs are in place. Any work in excess of 3 feet or work performed for the sole purpose of abating asbestos hazards must be designed and performed by licensed personnel and companies.
- All janitorial, custodial, and maintenance staff require a minimum of 2-hour asbestos awareness training and maintenance staff who perform O&M work must also have another 14 hours of training. Maintenance staff performing O&M work must also receive at least 4-hours refresher training every two years for the State and annual refresher training is required for 2-Hour and 16-Hour personnel in accordance with 29 CFR Part 1926.1101.
- A general review of the AHERA Plans should be completed periodically to ensure compliance with record keeping, training, labeling of ACBM in maintenance areas and as required by OSHA, annual notifications, and other requirements. The school must also continue with their 6-month surveillance activities. Certain record keeping and notification requirements may still be required regardless of whether new construction has occurred or all ACBMs have been removed.

The following Attachment 1 includes an index sheet with a description of codes used in the Attachment 2 building listings of ACBM assessed during this reinspection.

ATTACHMENT 1

CODE DESCRIPTIONS

(Index sheet for use with individual building listings included with Attachment 2)

EPA Assessment Codes:

1. Damaged or significantly damaged thermal systems insulation asbestos containing material (ACM)
2. Damaged friable surfacing ACM
3. Significantly damaged friable surfacing ACM
4. Damaged or significantly damaged friable miscellaneous ACM
5. ACBM with the potential for damage
6. ACBM with the potential for significant damage
7. Any remaining ACBM or friable suspected ACBM
- NF. Material is nonfriable and assessments are not required.

Response Summary Codes: (Summary of minimum recommendations only, please reference text of report and Attachment 2 for additional recommendations.)

Code Description

1. **Continue to manage this ACBM under the buildings Management Plan, Operations and Maintenance (O&M) Program and AHERA.** Conduct spot maintenance repairs of any minor damage present (nonfriable ACBM) or that occurs in accordance with AHERA and the School O&M Program.
2. **Conduct repair, surface cleaning, encapsulation or enclosure response actions** for this ACBM in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage this ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. Some small-scale maintenance work (<3 linear/square feet) can be completed by the School's maintenance staff if they qualify for the licensing exemption and they possess adequate training, current refresher training, and the necessary personal protective equipment and safety programs in place.
3. **Remove the ACBM and conduct surface decontamination** as recommended by accredited/licensed project designer in accordance with AHERA. Use care to not create dust in the area and to prevent further disturbance. Continue to manage any remaining ACBM under the buildings Management Plan, O&M Program and AHERA (See Summary Code 1). All assumed ACBM should be properly tested by a licensed inspection prior to abatement work or as soon as feasible, and the AHERA records updated accordingly. A licensed consultant design firm must prepare repair specifications (design) prior to obtaining pricing or bids for response actions by licensed asbestos contractors. All abatement activities must be conducted by properly accredited and licensed personnel/companies.
4. **Complete verification of AHERA Inspection documentation.** Licensed inspector must assume materials are ACBM or properly test additional suspect ACBM. Exterior materials, except under certain circumstances, are not covered under AHERA but still must be inspected and handled as ACBM in accordance with other State, local, and federal regulations. Licensed inspector and management planner must update ACBM listings and Management Plans as needed. Obtain architectural statements for new construction/renovation areas in accordance with AHERA. Confirm that proper numbers of samples have been collected.
5. **Abated material may be removed from ACBM listing.** Materials have been removed and abatement records are on file. RPF did not audit records for completeness or accuracy.
6. **Material could not be located** and may have been abated, or it was not possible to confirm if the materials observed were in fact newer replacement materials. Verify abatement records and, if all records are obtained and complete, update the ACBM listings to reflect the abatement work. If an MNO listing is due to an inaccessible area or locked room, such areas should be inspected when feasible.

ATTACHMENT 2

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
<p align="center">St. Paul's School Site No. 234 - Ellis</p>							
Den	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring. Possible inaccessible ACBM also.
Throughout	<p>Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.</p>						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p>							
<p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p>							
<p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 330-Gonzalez-O'Meara							
Porch	Transite	Misc	No	Fair	NF	1	Normal wear throughout
2nd Floor Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over by newer flooring
Basement Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	
Basement, N.W. Bedroom	Floor Tile	Misc	MNO	MNO	MNO	1	
Quirk Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	
S.W. Bedroom & Hall	Floor Tile	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 331- Bazon							
2nd Floor Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Basement, N.W. Bedroom	Floor Tile	Misc	No	Good	NF	1	
Basement, Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	
S.W. Bedroom & Hall Closet	Floor Tile	Misc	No	Good	NF	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes	
St. Paul's School								
Site No. 329 - Chase								
Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with	
2nd Floor Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1		
Basement, N.W. Bedroom	Floor Tile	Misc	No	Good	NF	1		
Basement, Bathroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring	
S.E. Bedroom	Floor Tile	Misc	No	Good	NF	1		
S.W. Bedroom	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.							Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.								
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.								
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.								

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 242							
Crawl/Space	Pipe insulation	TSI	Yes	MNO	MNO	6	Material was not observed and further review of the records is required.
1st Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
1st Floor Closet	Pipe Fitting	TSI	Yes	MNO	MNO	6	Material was not observed and further review of the records is required.
2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with
Washroom	Floor Tile	Misc	MNO	MNO	MNO	1	Possible inaccessible ACBM also.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 255							
Basement	Pipe Insulation	TSI	Yes	Damaged	1	3	Material was observed to have knicks, dents, and water damage
	Pipe Fitting	TSI	Yes	Damaged	1	3	
Garage	Transite	Misc.	No	Damaged	1	3	Material was observed to be cracked, broken pieces with debris present along the floor, and rough edges and should be removed as soon as possible
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 254							
1st Floor, Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 289							
Basement	Pipe Fitting	TSI	Yes	MNO	MNO	5	Material was removed in 1997 and may be removed from the listing
	Pipe Fitting	TSI	Yes	MNO	MNO	5	
Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
2nd Floor Closet	Linoleum	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 259 - Retweets							
1st Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
2nd Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
	Linoleum	Misc	No	Good	NF	1	
3rd Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Possible inaccessible ACBM also.							
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 261 - Lemeland							
1st Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
3rd Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
Wine Cellar	Pipe Insulation	TSI	Yes	MNO	MNO	5	Material was removed in July 1995 and may be removed from the listing
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Possible inaccessible ACBM also.							
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site 249							
Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring Possible inaccessible ACBM also.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 229 - Ryder							
2nd Floor Bathroom	Linoleum	Misc	No	Good	NF	1	
1st Floor Kitchen	Floor Tile	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 303							
Basement	Pipe Insulation	TSI	Yes	Poor	1	2	
	Pipe Insulation	TSI	MNO	MNO	MNO	5	Material was removed in 1995 and may be removed from the listing
Kitchen	Linoleum	Misc	No	Good	NF	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 327							
Basement Crawlspace	Pipe Insulation	TSI	Yes	MNO	MNO	6	Material was not observed and may have been encapsulated or removed. Further review is required.
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						Possible inaccessible ACBM also.
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 243, 244, 245, 246 Old Miller House							
Chen Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Chen Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Greenleaf Kitchen	Linoleum	Misc	MNO	MNO	MNO	1	
Greenleaf 2nd Floor Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
2nd Floor Apartment Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	
Top Floor Apartment	Linoleum	Misc	MNO	MNO	MNO	1	
2nd Floor Apartment Washroom	Linoleum	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.							
Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.							
Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 248 - Pattenoff							
Basement & Crawlspace	Pipe Insulation	TSI	Yes	MNO	MNO	5	Material was not observed and may have been encapsulated. Further review of the records is required
	Pipe Fitting	TSI	Yes	Poor	MNO	5	
Kitchen & Bathroom	Linoleum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							

St. Paul's School : 3-Year AHERA Reinspection 2007

Location	ACBM	Category	Friable	Condition	Assessment	Response	Notes
St. Paul's School							
Site No. 228 - Seaton Building							
En trance & Kitchen	Lino/leum	Misc	MNO	MNO	MNO	1	Site representative indicated this material has been covered over with newer flooring
1st Floor Bathroom	Lino/leum	Misc	MNO	MNO	MNO	1	
2nd Floor Bathrooms	Lino/leum	Misc	MNO	MNO	MNO	1	
Throughout	Other suspect materials are present and further review is required. Prior to any renovation and/or demolition a full NESHAP survey must be conducted in accordance with various state and federal regulations.						
<p>Category: MISC is miscellaneous material; TSI is thermal system insulation; SURF is surfacing material. Categorized in accordance with 40 CFR Part 763.</p> <p>Assessment Codes based on 40 CFR Part 763: 1. Damaged or significantly damaged thermal system insulation 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 ACM. "NF" means nonfriable, and assessments are not required. MNO means material not observed. Please reference AHERA and the school management plan for discussion on assessment codes.</p> <p>Response Codes: 1. Manage ACBM in accordance with Management Plan; 2. Conduct repairs and cleaning; 3. Conduct removal and cleaning; 4. Material suspect and requires further testing; 5. ACBM has been removed and may be removed from listings; 6. ACBM was not observed and further review is required. See further discussion and requirements in report.</p>							