DES Waste Management Division
29 Hazen Drive PO Box 95
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HAZARDOUS BUILDING MATERIALS ASSESSMENT
FORMER L.W. PACKARD MILL
MAIN MILL BUILDING AND BOILER HOUSE
Lots 17-4-16 and 17-7-7
Hill Avenue and Mechanic Street
Ashland, New Hampshire

NHDES Site No. 200009045
NHDES Project No. 36187

Prepared For:
Lakes Region Planning Commission
103 Main Street, Suite #3
Meredith, New Hampshire 03253
603-279-8171
Mr. Jeffery R. Hayes, Executive Director

Prepared By:
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March 16, 2018
File No. 93002.00

Elizabeth Reese

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HAZARDOUS BUILDING MATERIALS ASSESSMENT

FORMER L.W. PACKARD MILL
ASHLAND, NEW HAMPSHIRE
NHDES SITE No. 200009045
NHDES PROJECT No. 36187

Conducting Hazardous Materials Brownfields Inventory and Assessments in the Lakes Region Planning Commission Brownfields Work Assignment No. BFWA- 2017-002.00

FOR

Mr. Jeffery R. Hayes
Executive Director
Lakes Region Planning Commission
103 Main Street, Suite # 3
Meredith, New Hampshire 03253

BY

NOBIS ENGINEERING, INC.

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Nobis Project No. 93002.00
MARCH 16, 2018

Nobis
Engineering a Sustainable Future

Nobis
Engineering a Sustainable Future

March 16, 2018
File No. 93002.00

Mr. Jeffery R. Hayes
Executive Director
Lakes Region Planning Commission
103 Main Street, Suite # 3
Meredith, New Hampshire 03253

Re: Hazardous Building Materials Assessment
Former L.W. Packard Mill
Main Mill Building and Boiler House / Lots 17-4-16 and 17-7-7
Hill Avenue and Mechanic Street
Ashland, New Hampshire
NHDES Site No. 200009045, Project No. 36187

Dear Mr. Hayes:

Nobis Engineering, Inc. (Nobis) is pleased to submit this Hazardous Building Materials Survey for the above-referenced property. This work will be completed under Nobis' agreement with LRPC for *Conducting Hazardous Materials Brownfields Inventory and Assessments in the Lakes Region Planning Commission* (as executed on March 16, 2017) as Brownfields Work Assignment (BFWA) No. BFWA- 2017-002.00. These assessment efforts will use hazardous waste funding available through Environmental Protection Agency (EPA) Brownfields Grant BF-00A00022, which was awarded to LRPC. This report is subject to the limitations in Appendix A.

Thank you for the opportunity to be of service to you. Please do not hesitate to contact us if you have any questions.

Very truly yours,

NOBIS ENGINEERING, INC.

Joshua Stewart
Project Scientist

Clarence "Tim" Andrews
Sr. Project Manager
Director of Environmental Services

Attachments

cc: Ms. Kate Emma Schlosser, P.E., NHDES Brownfields Program
Mr. Alan Peterson, USEPA

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APPENDIX

1.0 INTRODUCTION

Nobis Engineering, Inc. (Nobis) has prepared this report summarizing the results of our Hazardous Building Materials Survey for the Former L.W. Packard Mill, Lots 17-4-16 and 17-7-7 (L.W. Packard; Site) located at 1 Hill Avenue and Mechanic Street. This work was performed as described in our "Work Scope and Budget Hazardous Building Materials Survey" dated June 7, 2017, as approved by Lakes Region Planning Commission (LRPC) on June 6, 2017. The field activities and laboratory analyses were completed in general accordance with the Field Task Work Plan and Site-Specific Quality Assurance Project Plan Addendum - Final (RFA 16002, Former LW Packard), prepared by Nobis and approved by NHDES and United States Environmental Protection Agency (USEPA) September 1 and 5, 2017, respectively. This report is subject to the limitations in Appendix A.

1.1 Purpose

The purpose of this study was to:

- Evaluate the presence and extent of potential hazardous building materials as referenced by Credere Associates, LLC (Credere) during the completion of a Phase I ESA of the target property and surrounding area in July 2015[1].

2.0 SITE DESCRIPTION

2.1 General Information

The subject Site is comprised of two properties located at Hill Avenue and Mechanic Street in Ashland, New Hampshire. The first parcel is a 0.94-acre lot identified as Lot 17-4-16 containing a 47,000-square foot Main Mill Building that formerly housed the dye house and wastewater treatment area for the mill. The second parcel is a 0.61-acre lot identified as Lot 17-7-7 containing a 4,800-square foot building that formerly served as the Boiler House for the mill complex (Boiler Building). The current owner of subject Site is Ashland Properties, LLC. The approximate location of the Site is shown on Figure 1 and a Site Plan is included as Figure 2.

[1] "Phase I Environmental Site Assessment, L.W. Packard Mill (Lots 4-16 and 7-7), 1 Hill Avenue and Mechanic Street, Ashland, NH, NHDES Site No. 200009045" prepared by Credere Associates, LLC of Westbrook, ME dated July 23, 2015.

2.2 Site Development and Use Summary

The mill facility produced textiles and leather board, and portions of the complex also generated electricity. The majority of the larger mill complex operated until 1999 when the on-site manufacturing operations ceased and the mill properties were subdivided and sold to different entities. Currently, the Site is vacant and is under consideration for redevelopment by the Town of Ashland.

The Site is constructed such that the Squam River flows beneath the Main Mill Building. Wastewater from the mill processes was discharged to the river until circa 1968 when the wastewater treatment area in the mill basement was constructed and discharges were directed to the Town wastewater treatment facility. This area of the basement reportedly floods during periods of high water.

2.3 Previous Environmental Investigations

A Phase I Environmental Site Assessment (ESA) was performed by Credere Associates, LLC. (Credere) in 2015. The ESA was completed for the property known as the L.W. Packard Lots 4-16 and 7-7 at 1 Hill Avenue and Mechanic Street, Ashland, New Hampshire. This work was performed within the context of ASTM E 1527-05, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process". Several Recognized Environmental Conditions (RECs) were documented. Several, additional environmental considerations were identified in the Phase I ESA which include Potential Asbestos Containing Materials (ACM) observed throughout the Site buildings, the likely presence of Lead-based paint (LBP) due to the age of the buildings, and the potential presence of polychlorinated biphenyl (PCB)-containing building materials due to the age and industrial nature of the buildings.

3.0 SCOPE OF SERVICES

The findings of the Phase I ESA identified the likelihood for hazardous building materials to be present within the buildings at the target property. The intent of this assessment was to perform a hazardous building materials survey to assess the potential presence of asbestos, lead, and PCBs in building materials at the site as requested by NHDES.

In support of completing this Hazardous Building Materials Survey, the following tasks were performed:

Site-Specific QAPP Addendum

Based on the information gathered during the initial site visit, Nobis prepared and submitted to the NHDES and United States Environmental Protection Agency (USEPA) a Field Task Work Plan (FTWP) and Site-Specific Quality Assurance Project Plan Addendum (SSQAPPA), which described the quality control (QC) and quality assurance (QA) protocols and other technical procedures followed during implementation of the work to ensure that the results meet the stated performance criteria. The FTWP/SSQAPPA was based on Nobis' Generic Quality Assurance Project Plan (Generic QAPP), Revision 3 (RFA #16002) as approved by USEPA on January 27, 2017 and NHDES on April 21, 2017, and refers to standard operating procedures for Nobis and Nobis' subcontractors.

Site-Specific Health and Safety Plan

Prior to conducting site work, Nobis prepared a site-specific Health and Safety Plan (HASP) that included all field activities proposed in accordance with Occupational Safety and Health Administration (OSHA) requirements.

Hazardous Building Materials Survey

Nobis performed a hazardous building materials survey of the site building. It is our understanding that the hazardous building materials survey is being conducted in preparation for a potential renovation of the building. The objective of the survey was to locate, identify, and estimate the quantity of asbestos-containing materials (ACM), lead-based paint (LBP) coated materials and potential PCB-containing building materials located within the site buildings. In addition, Nobis recorded other potentially-hazardous building materials, such as fluorescent lamps and ballasts.

Report Preparation

Nobis prepared this report summarizing the work conducted at the site and an assessment of findings for use by Lakes Region Planning Commission (LRPC), NHDES and EPA. The report includes a description of activities performed, summary of ACM, LBP and PCB concentrations

detected in building materials and provides recommendations for additional investigative or remedial work. A discussion of QA/QC, including data validation, is included.

4.0 HAZARDOUS BUILDING MATERIALS SURVEY METHODOLOGY

This section describes the methodology used to conduct the hazardous building materials survey.

4.1 Asbestos Containing Materials

Nobis provided an Asbestos Hazard Emergency Response Act (AHERA) accredited Asbestos Inspector who visually inspected and sampled the site buildings for the presence of suspect ACMs. Based on details provided in the Phase I ESA, size of the site buildings, and the anticipated demolition needs, Nobis collected 36 bulk samples of suspect ACM for analysis. Sampling activities were performed in general accordance with the Environmental Protection Agency's (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) standard for demolition and the AHERA sampling protocol. As the building is already in disrepair, it is understood that Nobis was not required to repair any damage that may have been related from sampling of building materials. Suspect ACM samples were packaged and shipped to EMSL Analytical, Inc. (EMSL) of Woburn, MA for bulk asbestos analysis. In general, the samples were analyzed by Polarized Light Microscopy (PLM). However, it has been documented that PLM analysis is not fail-proof when analyzing non-friable organically bound (NOB) materials. Therefore, transmission electron microscopy (TEM) analysis was required for three NOB materials that include flooring and associated mastics, and knob and tube wiring material.

4.2 PCB Containing Materials

Based on the Phase I ESA and the age of the structures, there were several suspect PCB-containing building materials:

- Caulking on various interior and exterior surfaces
- Paint and glossy painted surfaces

The rationale for PCB characterization of the building materials was to determine the potential presence of PCBs in these building materials. The results will be used to obtain abatement contractor quotes for redevelopment planning. Therefore, the sampling approach was to

characterize these building materials first, then make a determination if additional building materials that are in contact with any PCB-containing building materials would require characterization for PCBs. Based on field observations at the time of sampling, a total of five different suspect building materials were collected for analysis.

The proposed sampling program was to collect a sample of each suspect building material listed above for analysis of PCBs by EPA Method 3540C/8082, using the Soxhlet extraction method. Approximately 10 grams of each bulk material was collected. All samples were analyzed by Eastern Analytical, Inc. (EAI) of Concord, New Hampshire. Nobis utilized dedicated disposable field sampling tools and equipment for each sample collected, so decontamination between sample points was not required.

4.3 Lead-Based Paint

An OSHA pre-demolition LBP survey of the site building was performed by a licensed Lead Inspector using X-ray fluorescence (XRF), under subcontract to Nobis. The lead survey included testing of representative components of locations in the interior and exterior of the building. It is noted that toxicity characteristic leaching procedure (TCLP) lead waste disposal characterization was not included in this phase of the investigation, but will be required prior to disposal of any wastes generated during future abatement operations.

5.0 HAZARDOUS BUILDING MATERIALS SURVEY SUMMARY

The hazardous building material survey included the identification, quantification, and location of ACM, LBP, PCB-containing building materials, mercury fluorescence bulbs, potential PCB-containing ballasts, and miscellaneous containers. Detailed below are the hazardous materials identified within the Site buildings.

Figures 3 and 4 depict the approximate bulk sample locations for asbestos and PCBs samples collected at the Main Mill Building and the Boiler Building, respectively. The laboratory reports for the asbestos and PCB samples are included as Appendix B. A copy of the LBP report is included as Appendix C.

5.1 Asbestos Containing Materials

Mr. Karl Karlsson, an AHERA certified Asbestos Inspector, collected a total of 36 bulk samples throughout the Site buildings, on September 26 and 27, 2017. The bulk samples were transmitted under a chain-of-custody to EMSL Analytical, Inc. in Woburn, Massachusetts, a NHDES and U.S. Environmental Protection Agency (EPA) accredited laboratory. Prior to logging in the samples for analysis the laboratory separated mastic or other components of the bulk sample (linoleum, floor tile), if present, and designated a new sample identification number for the material and each component was analyzed separately. Following the separation of materials from the substrate, 46 samples were logged for potential analysis. The laboratory analyzed the samples by PLM in accordance with the EPA "Method for Determination of Asbestos in Bulk Material"; EPA/600/R-93/116 (July 1993). Four samples of NOB materials were identified for additional analysis by TEM, if the PLM analysis did not already identify the sample as ACM.

Homogeneous building material bulk samples were analyzed by the "hit-stop" procedure. Utilizing the "hit-stop" procedure, if asbestos is detected in a sample collected from a homogeneous area, the remaining samples collected from that same homogeneous area are not required to be analyzed. Through the "hit-stop" procedure, a final total of 35 bulk samples were analyzed by PLM. Results of the laboratory analyses indicated the presence of asbestos (greater than or equal to 1 percent) in 8 of the 35 bulk samples analyzed by PLM. Asbestos was not detected above 1 percent in any of the 4 NOB bulk samples analyzed by TEM.

The building materials identified as ACM in the Main Mill Building included window glazing, 12x12 gray floor tile and associated mastic, and building transite siding shingles. The perimeter of the Main Mill Building had fragments of broken transite shingles on the ground. Removal of the transite shingles should include any asbestos impacted soils around the Mill Building and should be excavated to a depth of 1-foot and 4 feet from the building. These materials were readily accessible from the site.

The building materials identified as ACM in the Boiler Building included window glazing, felt paper, and asphalt shingles. Roof shingles from the Boiler Building were observed to have fallen from the roof and are present on the ground. Removal of the shingles should include the shingles and all shingle fragments present around the Boiler Building. These materials were readily accessible from the site.

Additional information for the ACM identified at the Site buildings are included in Table 1. A copy of the laboratory analytical data is included in Appendix B.

5.2 PCB Containing Materials

The rationale for PCB characterization of suspect building materials was to determine the presence and/or concentrations of PCBs in building materials prior to renovation/demolition of the Site buildings. Mr. Karl Karlsson performed PCB sampling of building materials on September 26 and 27, 2017. The sampling program consisted of collecting one sample of each suspected building material for analysis of PCBs by EPA Method 3540C/8082, using the Soxhlet extraction method.

A total of five samples were collected by Nobis and analyzed by EAI. EAI required a minimum of 10 grams of material per sample, to achieve the reporting limit of 0.2 milligrams per kilogram (mg/kg) equivalent to parts per million (ppm). Of the five PCB samples analyzed, two had a detected concentration greater than the standard of 1 ppm for unconditional high occupancy area use. Building materials with PCBs present at concentrations below 50 ppm and present solely due to the inclusion of PCBs at the time of manufacture are classified under the Toxic Substances Control Act (TSCA) as Excluded PCB Products and abatement of these materials does not require EPA notification under TSCA. Building materials with total PCB concentrations above 50 ppm are classified as under TSCA as PCB Bulk Product Waste. A summary of the PCB analytical results is included in Table 2. A QA/QC discussion of the data is presented in Section 4.5. A copy of the laboratory analytical data is included in Appendix B. A discussion of the results is presented below:

<u>Main Mill Building</u>

P-1 (White Paint), P-2 (Green Paint), P-3 (Light Blue Paint):

No PCB Aroclors were detected in the samples.

<u>Boiler Building</u>

P-4 (Green Paint):

PCB Aroclors 1254 and 1260 were detected in the sample, with the total a concentration of 1.21 ppm. These materials exceeded the 1 ppm criterion for High Occupancy Use but did not exceed

the 10 ppm criterion for High Occupancy Use With Encapsulation and Deed Recordation. These materials would be classified as Excluded PCB Product and would not trigger TSCA notification requirements as the detected total PCB concentration is < 50 ppm.

P-5 (Boiler Building Caulking):

PCB Aroclors 1254 and 1260 were detected in the sample, with the total a concentration of 2.8 ppm. These materials exceeded the 1 ppm criterion for High Occupancy Use but did not exceed the 10 ppm criterion for High Occupancy Use With Encapsulation and Deed Recordation. These materials would be classified as Excluded PCB Product and would not trigger TSCA notification requirements as the detected total PCB concentration is < 50 ppm.

Definition of TSCA Criteria

Cleanup criteria based on high and low occupancy standards are established in 40 CFR §761.61. Cleanup levels for bulk PCB remediation waste is defined under 40 CFR §761.61 (a)(4)(i) and for porous material under 40 CFR §761.61 (a)(4)(iii).

High Occupancy Use: Defined under TSCA as any area where PCB remediation waste has been disposed of on-site, and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: 840 hours or more (an average of 16.8 hours or more per week) for non-porous surfaces and 335 hours or more (an average of 6.7 hours or more per week) for bulk PCB remediation waste.

Low Occupancy Use: Defined under TSCA as any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste.

Based on the total PCB concentrations reported, samples P-4 and P-5 have concentrations >1 ppm but ≤10 ppm, within the range of concentrations for High Occupancy Use with Encapsulation and Deed Recordation if PCBs are left in place. Based on total PCB concentrations no segregation of building material with Excluded PCB Product is required for abatement and disposal as non-PCB containing waste.

5.3 Lead-Based Paint Building Components

Mr. Mel Blackman, a New Hampshire licensed Lead Risk Assessor (License No. RA-0026) performed a LBP survey in the interior of the building as well as the painted exterior surfaces, on September 26 and 27, 2017. The LBP survey supports future renovation/demolition activities, the OSHA communication of hazard, and the OSHA zero tolerance for lead exposure requirements. A mobile x-ray fluorescence (XRF) analyzer was used to conduct the LBP survey. It is noted that toxicity characteristic leaching procedure (TCLP) lead waste disposal characterization was not included in this phase of the investigation, but will be required prior to disposal of any wastes generated during future abatement operations.

Mr. Blackman identified LBP on twenty-six specific surfaces within the building. Components coated with LBP include brick walls, structural steel and concrete, window frames and trim, door and trim, lally columns, and stair railings. XRF readings for lead equal to or greater than 1.0 milligrams per square centimeter (mg/cm^2) are summarized in Table 3. The LBP survey report is included in Appendix C.

5.4 Other Hazardous Materials

Nobis identified approximately 1,400 mercury fluorescent bulbs within the Main Mill building, and 10 mercury fluorescent bulbs within the Boiler Building. Fluorescent bulbs can contain small amounts of mercury that can become potentially harmful if the bulbs are broken.

Fluorescent light ballasts labeled as non-PCB containing may contain diethylhexyl phthalate (DEHP). DEHP was the primary substitute to replace PCBs for small capacitors in fluorescent lighting ballasts. DEHP is a toxic substance, a suspected carcinogen and is listed under RCRA and the Superfund law as a hazardous waste. Therefore, Superfund liability exists for landfilling of DEHP-containing ballasts.

Nobis identified approximately 450 ballasts within the Main Mill building and 8 ballasts within the Boiler Building that should be evaluated pursuant to TSCA via labeling, size, and/or date of manufacture for the likely presence of PCBs prior to disposal. Nobis observed some labeling of ballasts in the Main Mill that may contain PCBs. Further, several fuse boxes and breaker boxes were observed within the building. These electrical devices should also be evaluated via labeling,

size, and/or date of manufacture prior to disposal. Alternatively, these items could be assumed to contain PCBs at concentrations above 50 ppm and disposed of accordingly.

5.5 Quality Assurance and Quality Control Discussion

Asbestos

Asbestos samples of the same material were submitted for analysis in groups of up to three for analysis by PLM using a "hit-stop" procedure. For NOB materials, if all PLM samples indicated that no asbestos was present, a sample was analyzed by TEM. The asbestos sampling and analysis methods meet QAPP requirements.

Lead-Based Paint

The XRF device was calibrated by Mel Blackman prior to conducting the LBP survey and was found to be within the acceptable limits. The lead inspector performed three readings on all painted surfaces on interior and exterior building surfaces, and documented the low and high range results the XRF recorded. The LBP survey methods meet QAPP requirements.

PCBs in Building Materials

The sampling program consisted of collecting a sample of each suspected bulk product building material for analysis of PCBs by EPA Method 3540C/8082, using the Soxhlet extraction method. EAI required a minimum of 10 grams of material per sample, to achieve the reporting limit of 0.2 mg/kg. A rinsate blank was not collected, dedicated or disposable equipment was used for each sample. The PCB sampling methods meet QAPP requirements.

6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 Conclusions

Based on the data collected during the Hazardous Building Materials Survey that included collection and analysis of asbestos, lead paint, and building materials for PCB analysis, Nobis concludes the following:

- The building materials identified as ACM during Nobis' asbestos inspection included window glazing on window installed in both the Main Mill and the Boiler Building, floor tile and mastic, exterior siding shingles on the Main Mill, roofing on the Boiler Building, and gray felt matting in the Boiler Building.
- Components with LBP in the building include brick walls, structural steel and concrete, window frames and trim, door and trim, lally columns, and stair railings.
- Of the five PCB samples analyzed, two of the bulk materials had a detection of greater than 1 parts per million (ppm), but less than 10 ppm, within the range of concentrations allowed for High Occupancy Use with Encapsulation and Deed Recordation. Based on total PCB concentrations no segregation of building material with Excluded PCB Product is required for abatement and disposal needs.
- Nobis identified approximately 1,400 mercury fluorescent bulbs within the Main Mill Building, and 10 mercury fluorescent bulbs within the Boiler Building.
- Nobis identified approximately 450 light ballasts within the Main Mill Building and 8 light ballasts within the Boiler Building. Fluorescent light ballasts labeled as non-PCB containing may contain DEHP.
- Based on observed labels, some of the fluorescent light ballasts may contain PCBs.
- Several fuse boxes and breaker boxes were observed within the building. These electrical devices should also be evaluated for PCBs via labeling, size, and/or date of manufacture prior to disposal

6.2 Recommendations

Based on the observations during the field work and data collected during the Hazardous Building Materials Survey, Nobis recommends the following:

- Prior to renovation/demolition activities occurring, all ACM on the Site must be abated by a licensed asbestos abatement contractor in accordance with NHDES regulations. All abated asbestos containing materials must be disposed of at a NHDES approved disposal facility.
- Any asbestos impacted soils around the Mill Building and should be excavated to a depth of 1-foot and out to 4 feet from the building.

- As a component of the building renovation/demolition plan, the building components that contain lead-based paint need to be handled appropriately in order to prevent worker exposure.
- Prior to renovation/demolition a representative building material sample must be collected and analyzed for TCLP PCBs and Lead.
- All removed ballasts, fluorescent light bulbs and electrical devices should be assessed and managed appropriately during renovation by recycling/disposal at an appropriately licensed facility.
- Bulk materials identified as containing greater than 1 ppm but less than 50 ppm total PCBs are classified as Excluded PCB Products under TSCA. If identified PCB impacted bulk materials will be removed during site redevelopment activities, proper disposal of the material is required.

TABLES

TABLE 1A

SUMMARY OF ASBESTOS ANALYTICAL RESULTS - MAIN MILL BUILDING

Former LW Packard Mill
Main Mill Building and Boiler House (Lots 17-4-16 and 17-7-7)
Hill Avenue and Mechanic Street
Ashland, New Hampshire

Sample Number	Sample Location	Type of Material[1]	Asbestos % and Type[2]	Friable or Non-Friable[3]	Physical Condition[4]	Accessibility / Potential for Disturbances[5]	Estimated Quantity of ACM (SF/LF/CF)
A-1	Exterior 3rd Floor Window 4/5 Glazing	M	NAD				
A-2	Exterior 3rd Floor Window 4/5 Glazing	M	NAD				
A-3	**Exterior 3rd Floor Window 4/5 Glazing**	**M**	**2% CH**	**NF**	**D**	**Moderate**	**20 Units**
A-4	Exterior 2nd Floor Window 5/4 Glazoing	M	NAD				
A-5	**Exterior 2nd Floor Window 5/4 Glazoing**	**M**	**2% CH**	**NF**	**D**	**Moderate**	**20 Units**
A-6	Exterior 2nd Floor Window 5/4 Glazoing	M	Not Analyzed				
A-7 Floor Tile	3rd Floor 12x12 Gray Floor Tile	M	NAD (TEM)				
A-7Mastic	**3rd Floor 12x12 Gray Floor Tile Mastic**	**M**	**10% CH**	**NF**	**D**	**Moderate**	**450 SF**
A-8 Floor Tile	3rd Floor 12x12 Gray Floor Tile	M	NAD				
A-8 Mastic	3rd Floor 12x12 Gray Floor Tile Mastic	M	Not Analyzed				
A-9 Floor Tile	3rd Floor 12x12 Gray Floor Tile	M	NAD				
A-9 Mastic	3rd Floor 12x12 Gray Floor Tile Mastic	M	Not Analyzed				
A-10	**Exterior 3rd Floor Small Window Glazing**	**M**	**3% CH**	**NF**	**D**	**Moderate**	**15 Units**
A-11	Exterior 3rd Floor Small Window Glazing	M	Not Analyzed				
A-12	Exterior 3rd Floor Small Window Glazing	M	Not Analyzed				
A-13	**Exterior Cement Siding Tiles**	**M**	**20% CH**	**NF**	**D**	**Moderate**	**20,000 SF**
A-14	Exterior Cement Siding Tiles	M	Not Analyzed				
A-15	Exterior Cement Siding Tiles	M	Not Analyzed				
A-16 Base Cove	1st Floor - Bathroom Base Cove	M	NAD				
A-16 Mastic	1st Floor - Bathroom Base Cove Mastic	M	NAD				
A-17 Base Cove	1st Floor - Bathroom Base Cove	M	NAD (TEM)				
A-17 Mastic	1st Floor - Bathroom Base Cove Mastic	M	NAD (TEM)				
A-18 Base Cove	1st Floor - Bathroom Base Cove	M	NAD				
A-18 Mastic	1st Floor - Bathroom Base Cove Mastic	M	NAD				
A-19	1st Floor - Office 12x12 Tan Tile	M	NAD				
A-20	1st Floor - Office 12x12 Tan Tile	M	NAD				
A-21	1st Floor - Office 12x12 Tan Tile	M	NAD				
A-22	1st Floor - Office 2'x4' Acoustic Ceiling Tile	M	NAD				
A-23	1st Floor - Office 2'x4' Acoustic Ceiling Tile	M	NAD				
A-24	1st Floor - Office 2'x4' Acoustic Ceiling Tile	M	NAD				

1) M=Miscellaneous, S=Surfacing or TSI=Thermal System Insulation
2) CH = Chrysotile; or NAD = No Asbestos Detected
3) F = Friable; or NF = Nonfriable
4) U = Undamaged, limited or no visible damage or deterioration; D = Damaged, surface is blistering, crumbling, water stained, gouged, marred or abraded up to 10% of area if damage is evenly distributed, orto 25% if damage is localized; or SD = Significantly Damaged, surface is crumbling, water stained, gouged, marred or abraded over at least 10% of area if damage is evenly distributed, or over at least 25% if damage is localized.
5) low = No Potential for Damage; medium = Potential for Damage; or high = Potential for Significant Damage
6) samples were analyzed using Polarized Light Microscopy (PLM). In cases where the samples were reanalyzed using point count methods (PC), or transmission electron microscopy (TEM), this is indicated.

TABLE 1B

SUMMARY OF ASBESTOS ANALYTICAL RESULTS - BOILER BUILDING

Former LW Packard Mill
Main Mill Building and Boiler House (Lots 17-4-16 and 17-7-7)
Hill Avenue and Mechanic Street
Ashland, New Hampshire

Sample Number	Sample Location	Type of Material[1]	Asbestos % and Type[2]	Friable or Non-Friable[3]	Physical Condition[4]	Accessibility / Potential for Disturbances[5]	Estimated Quantity of ACM (SF/LF/CF)
A-25	Boiler Building - Exterior Window Glazing	M	NAD				
A-26	Boiler Building - Exterior Window Glazing	M	NAD				
A-27	Boiler Building - Exterior Window Glazing	M	NAD				
A-28 Silver Paint	**Boiler Building - Exterior Asphalt Roof**	**M**	**2% CH**	**NF**	**D**	**Moderate**	**5,000 SF**
A-28 Tar Paper	Boiler Building - Exterior Asphalt Roof	M	NAD				
A-28 Shingle	Boiler Building - Exterior Asphalt Roof	M	NAD				
A-29 Shingle and Tar Paper	Boiler Building - Exterior Asphalt Roof	M	NAD (TEM)				
A-30 Silver Paint	Boiler Building - Exterior Asphalt Roof	M	Not Analyzed				
A-30 Tar Paper	Boiler Building - Exterior Asphalt Roof	M	NAD				
A-30 Shingle	Boiler Building - Exterior Asphalt Roof	M	NAD				
A-31	**Boiler Building - Interior Felt mat**	**M**	**30% CH**	**NF**	**D**	**Moderate**	**10 SF**
A-32	Boiler Building - Interior Felt mat	M	Not Analyzed				
A-33	Boiler Building - Interior Felt mat	M	Not Analyzed				
A-34	Boiler Building - Exterior Window Glazing 5/6	M	NAD				
A-35	Boiler Building - Exterior Window Glazing 5/6	M	NAD				
A-36	**Boiler Building - Exterior Window Glazing 5/6**	**M**	**2% CH**	**NF**	**D**	**Moderate**	**5 Units**

1) M=Miscellaneous, S=Surfacing or TSI=Thermal System Insulation
2) CH = Chrysotile; or NAD = No Asbestos Detected
3) F = Friable; or NF = Nonfriable
4) U = Undamaged, limited or no visible damage or deterioration; D = Damaged, surface is blistering, crumbling, water stained, gouged, marred or abraded up to 10% of area if damage is evenly distributed, orto 25% if damage is localized; or SD = Significantly Damaged, surface is crumbling, water stained, gouged, marred or abraded over at least 10% of area if damage is evenly distributed, or over at least 25% if damage is localized.
5) low = No Potential for Damage; medium = Potential for Damage; or high = Potential for Significant Damage
6) samples were analyzed using Polarized Light Microscopy (PLM). In cases where the samples were reanalyzed using point count methods (PC), or transmission electron microscopy (TEM), this is indicated.

TABLE 2

SUMMARY OF PCB SCREEENING RESULTS

Former LW Packard Mill
Main Mill Building and Boiler House (Lots 17-4-16 and 17-7-7)
Hill Avenue and Mechanic Street
Ashland, New Hampshire

										PCB Cleanup Standards	High Occupancy	Unconditional	1 mg/kg
												Encapsulated/Capped	10 mg/kg
											Low Occupancy	Unconditional	25 mg/kg
												Encapsulated/Capped	100 mg/kg
				Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Aroclor 1262	Aroclor 1268	Total PCBs
Sample	Matrix	Location	Date	NS	NS	NS	NS	NS	NS	NS	NS	NS	1
P-1	White Paint	Main Mill Building	9/26/2017	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<1.8
P-2	Green Paint	Main Mill Building	9/26/2017	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<1.8
P-3	Light Blue Paint	Main Mill Building	9/26/2017	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<0.2	<1.8
P-4	Green Paint	Boiler Building	9/26/2017	<0.2	<0.2	<0.2	<0.2	<0.2	0.76	0.45	<0.2	<0.2	**1.21**
P-5	Caulking	Boiler Building	9/27/2017	<0.2	<0.2	<0.2	<0.2	<0.2	1.8	0.99	<0.2	<0.2	**2.8**

Notes:
1. All concentrations reported in milligrams per kilogram (mg/kg) equivalent to parts per million (ppm) unless otherwise indicated.
2 "<" indicates that parameter was not present above the given analytical detection limit.
3. Samples collected by Nobis Engineering, Inc. on the dates indicated.
4. Laboratory analyses performed by Eastern Analytical, Inc. of Concord, NH.
5. PCB Cleanup levels are stated in 40 CFR § 761.61. Cleanup Levels listed are for bulk PCB remediation waste 40 CFR § 761.61 (a)(4)(i), and porous surfaces 40 CFR § 761.61 (a)(4)(iii).
10. High Occupancy Use: Defined under TSCA as any area where PCB remediation waste has been disposed of on-site, and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: 840 hours or more (an average of 16.8 hours or more per week) for non-porous surfaces and 335 hours or more (an average of 6.7 hours or more per week) for bulk PCB remediation waste.
11. Low Occupancy Use: Defined under TSCA as any area where PCB remediation waste has been disposed of on-site and where occupancy for any individual not wearing dermal and respiratory protection for a calendar year is: less than 840 hours (an average of 16.8 hours per week) for non-porous surfaces and less than 335 hours (an average of 6.7 hours per week) for bulk PCB remediation waste.

TABLE 3

SUMMARY OF LEAD-BASED PAINT SURVEY RESULTS

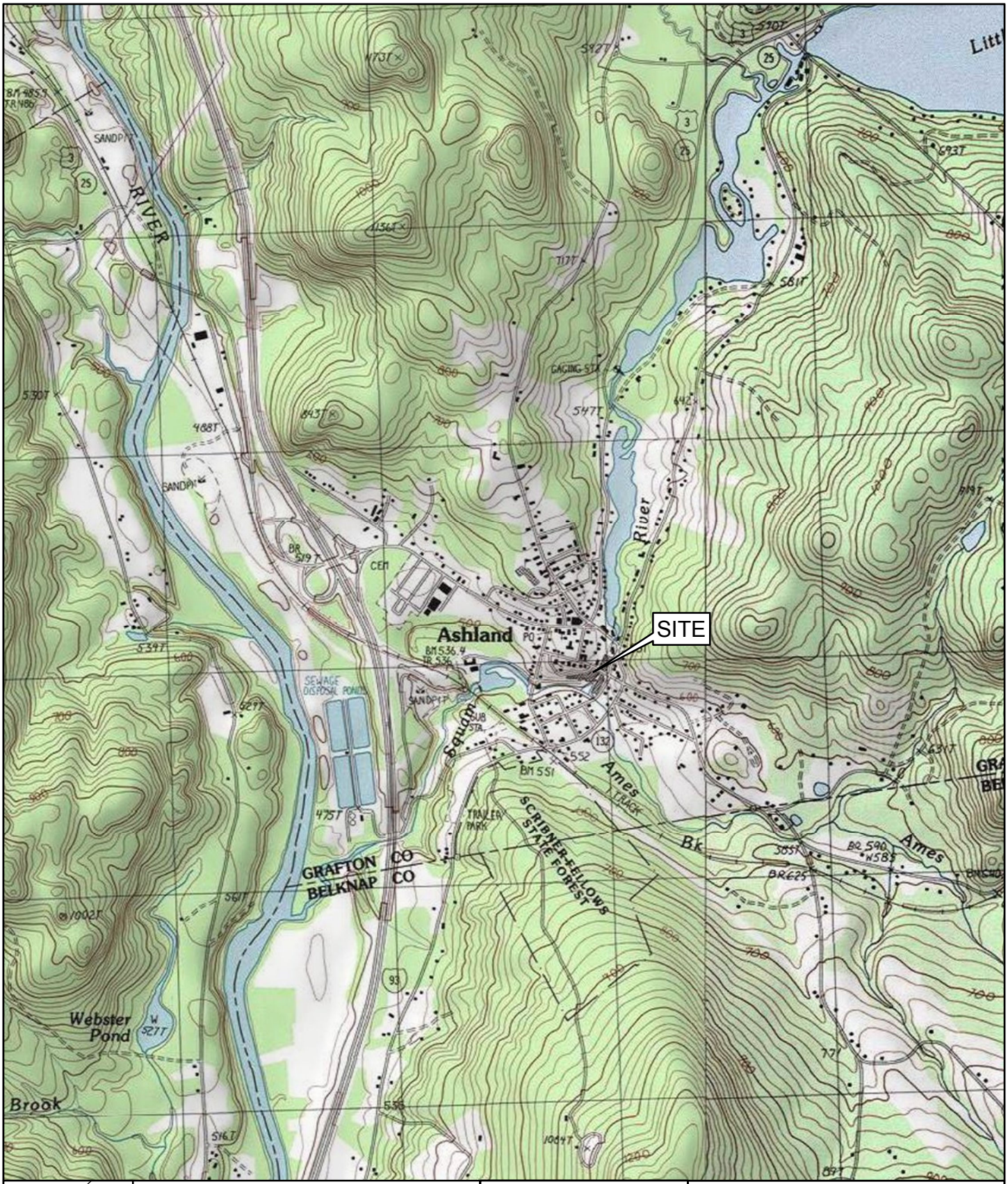
Former LW Packard Mill
Main Mill Building and Boiler House (Lots 17-4-16 and 17-7-7)
Hill Avenue and Mechanic Street
Ashland New Hampshire

Lead-Based Paint Inspection Performed on 9/26/2017-9/27/2017

Description of Material/Location of Material	Lead Concentrations and Physical Condition
Main Mill Building - 1st Floor	
Yellow metal support columns	1.4 - 4.9 mg/cm2, Loose
Green concrete support column bases	0.3 - 2.2 mg/cm2, Loose
White and green metal support columns and structural steel	0.4 - 1.4 mg/cm2, Loose
Main Mill Building - 2nd Floor	
Yellow and white metal columns and structural steel	4.0 - 5.7 mg/cm2
Yellow metal round columns	2.9 - 4.6 mg/cm2, Loose
Main Mill Building - 3rd Floor	
Gray metal sliding fire door	9.9 mg/cm2, Loose
Yellow metal round column	2.3 - 4.0 mg/cm2, Loose
White, gray, and green wood walls	2.2 - 3.5 mg/cm2, Loose
Main Mill Building - Basement	
White metal structrural steel	0.2 - 1.4 mg/cm2, Loose
Yellow metal staircase rails	0.7 - 1.1 mg/cm2, Loose
Main Mill Building - Staircase 1st Floor to Attic	
Green wood door and trim	9.9 mg/cm2, Loose
White wood newel posts and columns	2.3 - 5.8 mg/cm2, Loose
White wood railing cap	2.3 - 5.8 mg/cm2, Loose
Green wood walls	3.7 - 5.5 mg/cm2, Loose
White wood risers	1.2 - 3.0 mg/cm2, Loose
Yellow metal rail	1.6 - 2.9 mg/cm2, Loose
White and green brick walls	1.0 - 3.3 mg/cm2, Loose
Main Mill Building - Ramp 2nd to 3rd Floor	
Yellow metal rails	1.9 - 2.8 mg/cm2, Loose
Main Mill Building -Exterior	
Green wood loading dock door and trim	2.5 - 3.7 mg/cm2, Loose
Boiler Building - Interior	
Green wood exterior sides of windows and trim	1.8 - 2.0 mg/cm2
Green metal sliding fire door	1.4 - 1.8 mg/cm2
Yellow metal rails on staircase	1.0 - 1.2 mg/cm2, Loose
Boiler Building - Exterior	
Green metal sliding door and trim	1.8 - 5.5 mg/cm2, Loose
White and green wood overhead door and trim	3.2 - 3.9 mg/cm2
Gray brick walls	2.5 - 3.0 mg/cm2, Loose

1. For additional information refer to the attached Pre-Renovation/Demolition Lead Based Paint Survey report, completed by Master Lead Inspector Mr. Mel Blackman attached.
2. Due to unsafe conditions not all building components were accessable for testing.

FIGURES



USGS Topographic Map
Ashland, New Hampshire
1987

0 1,000 2,000 4,000

Feet1 inch = 2,000 feet

N

Nobis
Engineering a Sustainable Future
Nobis Engineering, Inc.
18 Chenell Drive
Concord, NH 03301
T(603) 224-4182
www.nobiseng.com
Client-Focused, Employee-Owned

FIGURE 1

LOCUS PLAN
L.W. PACKARD MILL
HILL AVENUE
ASHLAND, NEW HAMPSHIRE

PREPARED BY: NZ	CHECKED BY: TA
PROJECT NO. 70702.00	DATE: MARCH 2018

Path: J:\70702.00 - L.W. Packard Mill Brownfields Assessment\GIS\Figures\Figure 1 Locus Plan.mxd **Date Printed:** 3/19/2018

Notes:

1. Site Plan was developed from several sources including, City of Ashland Tax Map 17, observations made by Nobis, and from the aerial photography provided by New Hampshire GRANIT.

2. Locations of site features depicted hereon are approximate and given for illustrative purposes only.

Legend

- Property Boundary
- Edge of Waterbody
- Boiler Building
- Main Mill Building

0 25 50 100

Feet

1 inch = 50 feet

N

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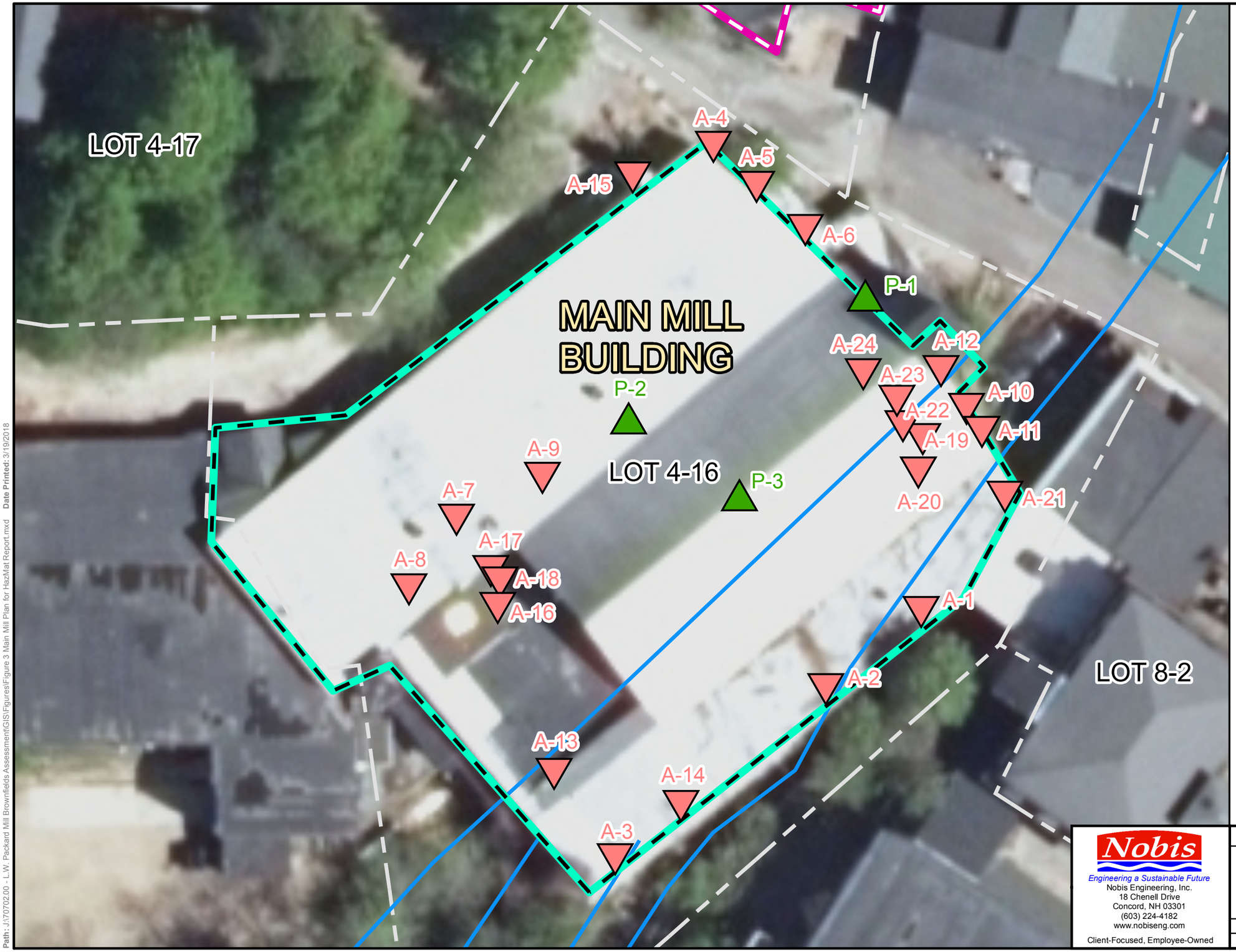
FIGURE 2

SITE PLAN
L.W. PACKARD MILL
ASHLAND, NEW HAMPSHIRE

PREPARED BY: JRS	CHECKED BY: TA
PROJECT NO. 93002.00	DATE: MARCH 2018

Path: J:\70702.00 - L.W. Packard Mill Brownfields Assessment\GIS\Figures\Figure 2 Site Plan for HazMat Report.mxd **Date Printed:** 3/19/2018



Notes:

1. Site Plan was developed from several sources including, City of Ashland Tax Map 17, observations made by Nobis, and from the aerial photography provided by New Hampshire GRANIT.

2. Refer to Table 1 for exact sample location and material sampled.

3. Locations of site features depicted hereon are approximate and given for illustrative purposes only.

Legend

- Asbestos Sample Location
- PCB Sample Location
- Property Boundary
- Edge of Waterbody
- Boiler Building
- Main Mill Building

0 12.5 25 50

Feet

1 inch = 25 feet

N

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FIGURE 3

MAIN MILL BUILDING DETAIL
WITH SAMPLE LOCATIONS
L.W. PACKARD MILL
ASHLAND, NEW HAMPSHIRE

PREPARED BY: JRS	CHECKED BY: TA
PROJECT NO. 93002.00	DATE: MARCH 2018

Path: J:\70702.00 - L.W. Packard Mill Brownfields Assessment\GIS\Figures\Figure 3 Main Mill Plan for HazMat Report.mxd **Date Printed:** 3/19/2018

Notes:

1. Site Plan was developed from several sources including, City of Ashland Tax Map 17, observations made by Nobis, and from the aerial photography provided by New Hampshire GRANIT.

2. Refer to Table 1 for exact sample location and material sampled.

3. Locations of site features depicted hereon are approximate and given for illustrative purposes only.

Legend

- Asbestos Sample Location
- PCB Sample Location
- Property Boundary
- Edge of Waterbody
- Boiler Building
- Main Mill Building

0 12.5 25 50

Feet

1 inch = 25 feet

N

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FIGURE 4

BOILER BUILDING DETAIL
WITH SAMPLE LOCATIONS
L.W. PACKARD MILL
ASHLAND, NEW HAMPSHIRE

PREPARED BY: JRS	CHECKED BY: TA
PROJECT NO. 93002.00	DATE: MARCH 2018

Path: J:\70702.00 - L.W. Packard Mill Brownfields Assessment\GIS\Figures\Figure 4 Boiler Building Plan for HazMat Report.mxd **Date Printed:** 3/19/2018

APPENDICES

APPENDIX A

APPENDIX A

LIMITATIONS

1) These environmental services were performed in accordance with generally accepted practices of other consultants undertaking similar assessments at the same time and in the same geographical area. The results of this assessment are based on our professional judgment and are not scientific certainties. Specifically, Nobis Engineering, Inc. does not and cannot represent that the site contains no hazardous wastes, oil or other latent conditions beyond those observed during this assessment. No other warranty, express or implied, is made.

2) The observations and conclusions presented in this report were made solely on the basis of conditions described in the report and not on scientific tasks or procedures beyond the scope of described services or the budgetary and time constraints imposed by the client. The work described in this report was performed in accordance with the terms and conditions of our contract. No other warranty, express or implied, is made.

3) Observations were made of the site as indicated in this report. Where access to portions of the site were unavailable or limited, Nobis Engineering, Inc. renders no opinion as to the presence of hazardous wastes or the presence of indirect evidence of hazardous wastes in that portion of the site.

4) No property boundary, site feature or topographic surveys of the site were performed by Nobis Engineering, Inc. unless specifically indicated in the text of the report.

5) No sampling or testing was performed for the presence of dioxins, furans, pesticides, herbicides, radon, lead paint, urea-formaldehyde, asbestos or polychlorinated biphenyls (PCBs) at the site unless specifically indicated in the text of the report. The observation, identification or assessment for the presence or absence of any mold, rot or fungi is beyond the scope of services for this work.

6) Except as noted within the text of the report, no quantitative laboratory testing was performed as part of this assessment. Where such analyses have been conducted by an outside laboratory, Nobis Engineering, Inc. has relied upon the data provided and has not conducted an independent evaluation of the reliability of these data.

7) Chemical analyses have been performed for specific parameters during this site assessment, as described in the text of the report. Additional chemical constituents not searched for during the current study may be present in soil and/or groundwater at the site.

8) This report has been prepared for the exclusive use of the New Hampshire Department of Environmental Services (NHDES) and the Lakes Region Planning Commission solely for use in an environmental evaluation of the site. This report shall not, in whole or in part, be conveyed to any other party, other than those authorized by NHDES and Lakes Region Planning Commission without prior written consent of Nobis Engineering, Inc.

APPENDIX B

EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

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

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

EMSL Order:	131704973
Customer ID:	NOBI50
Customer PO:	
Project ID:	

Attention:	Karl Karlsson	**Phone:**	(603) 224-4182
	Nobis Engineering, Inc.	**Fax:**	(603) 224-2507
	18 Chenell Drive	**Received Date:**	11/02/2017 9:02 AM
	Concord, NH 03301	**Analysis Date:**	11/16/2017
		Collected Date:	
Project:	93002.00		

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

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-1 *131704973-0001*	3rd Floor - Window Glazing 4/5	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-2 *131704973-0002*	3rd Floor - Window Glazing 4/5	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-3 *131704973-0003*	3rd Floor - Window Glazing 4/5	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
A-4 *131704973-0004*	2nd Floor - Window Glazing 5/4	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-5 *131704973-0005*	2nd Floor - Window Glazing 5/4	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
A-6 *131704973-0006*	2nd Floor - Window Glazing 5/4				Positive Stop (Not Analyzed)
A-7-Floor Tile *131704973-0007*	3rd Floor - Gray Floor Tile & Mastic	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-7-Mastic *131704973-0007A*	3rd Floor - Gray Floor Tile & Mastic	Black Non-Fibrous Homogeneous		90% Non-fibrous (Other)	10% Chrysotile
A-8-Floor Tile *131704973-0008*	3rd Floor - Gray Floor Tile & Mastic	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-8-Mastic *131704973-0008A*	3rd Floor - Gray Floor Tile & Mastic				Positive Stop (Not Analyzed)
A-9-Floor Tile *131704973-0009*	3rd Floor - Gray Floor Tile & Mastic	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-9-Mastic *131704973-0009A*	3rd Floor - Gray Floor Tile & Mastic				Positive Stop (Not Analyzed)
A-10 *131704973-0010*	3rd Floor - Small Windows Glazing	White Fibrous Homogeneous		97% Non-fibrous (Other)	3% Chrysotile
A-11 *131704973-0011*	3rd Floor - Small Windows Glazing				Positive Stop (Not Analyzed)
A-12 *131704973-0012*	3rd Floor - Small Windows Glazing				Positive Stop (Not Analyzed)
A-13 *131704973-0013*	Exterior - Siding	Gray Fibrous Homogeneous		80% Non-fibrous (Other)	20% Chrysotile

Initial report from: 11/16/2017 11:26:45

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

EMSL Order: 131704973
Customer ID: NOBI50
Customer PO:
Project ID:

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

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-14 *131704973-0014*	Exterior - Siding				Positive Stop (Not Analyzed)
A-15 *131704973-0015*	Exterior - Siding				Positive Stop (Not Analyzed)
A-16-Cove Base *131704973-0016*	1st Floor Bathroom - Base Cove & Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-16-Mastic *131704973-0016A*	1st Floor Bathroom - Base Cove & Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-17-Cove Base *131704973-0017*	1st Floor Bathroom - Base Cove & Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-17-Mastic *131704973-0017A*	1st Floor Bathroom - Base Cove & Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-18-Cove Base *131704973-0018*	1st Floor Bathroom - Base Cove & Mastic	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-18-Mastic *131704973-0018A*	1st Floor Bathroom - Base Cove & Mastic	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-19 *131704973-0019*	1st Floor - Floor Tile	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-20 *131704973-0020*	1st Floor - Floor Tile	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-21 *131704973-0021*	1st Floor - Floor Tile	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-22 *131704973-0022*	1st Floor Office - 2x4 Acoustic Ceiling Tile	Tan/White Fibrous Homogeneous	40% Cellulose 40% Min. Wool	20% Non-fibrous (Other)	None Detected
A-23 *131704973-0023*	1st Floor Office - 2x4 Acoustic Ceiling Tile	Tan/White Fibrous Homogeneous	40% Cellulose 40% Min. Wool	20% Non-fibrous (Other)	None Detected
A-24 *131704973-0024*	1st Floor Office - 2x4 Acoustic Ceiling Tile	Tan/White Fibrous Homogeneous	40% Cellulose 40% Min. Wool	20% Non-fibrous (Other)	None Detected
A-25 *131704973-0025*	Boiler Building - Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-26 *131704973-0026*	Boiler Building - Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-27 *131704973-0027*	Boiler Building - Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-28-Silver Paint *131704973-0028*	Boiler Building - Asphalt Roof	Black/Silver Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
A-28-Tar Paper *131704973-0028A*	Boiler Building - Asphalt Roof	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected

Initial report from: 11/16/2017 11:26:45

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

EMSL Order: 131704973
Customer ID: NOBI50
Customer PO:
Project ID:

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

			Non-Asbestos		Asbestos
Sample	**Description**	**Appearance**	**% Fibrous**	**% Non-Fibrous**	**% Type**
A-28-Shingle *131704973-0028B*	Boiler Building - Asphalt Roof	Black Fibrous Homogeneous	50% Cellulose	50% Non-fibrous (Other)	None Detected
A-29 *131704973-0029*	Boiler Building - Asphalt Roof	Black Fibrous Homogeneous	70% Cellulose	30% Non-fibrous (Other)	None Detected
A-30-Silver Paint *131704973-0030*	Boiler Building - Asphalt Roof				Positive Stop (Not Analyzed)
A-30-Tar Paper *131704973-0030A*	Boiler Building - Asphalt Roof	Black Non-Fibrous Homogeneous	50% Cellulose	50% Non-fibrous (Other)	None Detected
A-30-Shingle *131704973-0030B*	Boiler Building - Asphalt Roof	Black Fibrous Homogeneous	30% Cellulose	70% Non-fibrous (Other)	None Detected
A-31 *131704973-0031*	Boiler Building - Above Door	Gray Fibrous Homogeneous	30% Cellulose	40% Non-fibrous (Other)	30% Chrysotile
A-32 *131704973-0032*	Boiler Building - Above Door				Positive Stop (Not Analyzed)
A-33 *131704973-0033*	Boiler Building - Above Door				Positive Stop (Not Analyzed)
A-34 *131704973-0034*	Boiler Building - 5/6 Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-35 *131704973-0035*	Boiler Building - 5/6 Window Glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
A-36 *131704973-0036*	Boiler Building - 5/6 Window Glazing	White Non-Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile

Analyst(s)
Elizabeth Stutts (26)
Michael Mink (10)

Steve Grise, Laboratory Manager
or Other Approved Signatory

Initial report from: 11/16/2017 11:26:45

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

EMSL Order: 131704973
Customer ID: NOBI50
Customer PO:
Project ID:

Attention: Karl Karlsson
Nobis Engineering, Inc.
18 Chenell Drive
Concord, NH 03301

Project: 93002.00

Phone: (603) 224-4182
Fax: (603) 224-2507
Received Date: 11/02/2017 9:02 AM
Analysis Date: 11/30/2017
Collected Date:

Test Report: 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
A-7-Floor Tile *131704973-0007*	3rd Floor - Gray Floor Tile & Mastic	Gray Non-Fibrous Homogeneous	100	None	No Asbestos Detected
A-17-Cove Base *131704973-0017*	1st Floor Bathroom - Base Cove & Mastic	Black Non-Fibrous Homogeneous	100	None	No Asbestos Detected
A-17-Mastic *131704973-0017A*	1st Floor Bathroom - Base Cove & Mastic	Yellow Non-Fibrous Homogeneous	100	None	No Asbestos Detected
A-29 *131704973-0029*	Boiler Building - Asphalt Roof	Black Fibrous Homogeneous	100	None	No Asbestos Detected

Analyst(s)

Michael Mink (4)

Steve Grise, 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. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample.

Samples analyzed by EMSL Analytical, Inc. Woburn, MA

Initial report from: 11/30/2017 11:07:36

Eastern Analytical, Inc.
professional laboratory and drilling services

Tim Andrews
Nobis Engineering
18 Chenell Drive
Concord , NH 03301

Subject: Laboratory Report

Eastern Analytical, Inc. ID:	174881
Client Identification:	L.W. Packard | 93002.00
Date Received:	10/19/2017

Dear Mr. Andrews :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at www.eailabs.com for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

Solid samples are reported on a dry weight basis, unless otherwise noted
< : "less than" followed by the reporting limit
> : "greater than" followed by the reporting limit
%R : % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269) and Vermont (VT1012).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample(s) 30 days from the sample receipt date.

We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

Lorraine Olashaw, Lab Director | 10.27.17 Date | 3 # of pages (excluding cover letter)

SAMPLE CONDITIONS PAGE

EAI ID#: **174881**

Client: **Nobis Engineering**

Client Designation: **L.W. Packard | 93002.00**

Temperature upon receipt (°C): 0.0 **Received on ice or cold packs (Yes/No): Y**

Acceptable temperature range (°C): 0-6

Lab ID	Sample ID	Date Received	Date Sampled	Sample Matrix	% Dry Weight	Exceptions/Comments (other than thermal preservation)
174881.01	P-1	10/19/17	9/26/17	solid	100.0	Adheres to Sample Acceptance Policy
174881.02	P-2	10/19/17	9/26/17	solid	100.0	Adheres to Sample Acceptance Policy
174881.03	P-3	10/19/17	9/26/17	solid	100.0	Adheres to Sample Acceptance Policy
174881.04	P-4	10/19/17	9/26/17	solid	100.0	Adheres to Sample Acceptance Policy
174881.05	P-5	10/19/17	9/27/17	solid	100.0	Adheres to Sample Acceptance Policy

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.
Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

1) EPA 600/4-79-020, 1983
2) Standard Methods for Examination of Water and Wastewater,20th Edition, 1998 and 22nd Edition, 2012
3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
4) Hach Water Analysis Handbook, 2nd edition, 1992

LABORATORY REPORT

EAI ID#: **174881**

Client: **Nobis Engineering**

Client Designation: **L.W. Packard | 93002.00**

Sample ID:	P-1	P-2	P-3	P-4	P-5
Lab Sample ID:	174881.01	174881.02	174881.03	174881.04	174881.05
Matrix:	solid	solid	solid	solid	solid
Date Sampled:	9/26/17	9/26/17	9/26/17	9/26/17	9/27/17
Date Received:	10/19/17	10/19/17	10/19/17	10/19/17	10/19/17
Units:	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Date of Extraction/Prep:	10/23/17	10/23/17	10/23/17	10/23/17	10/23/17
Date of Analysis:	10/25/17	10/25/17	10/25/17	10/25/17	10/25/17
Analyst:	SG	SG	SG	SG	SG
Method:	8082A	8082A	8082A	8082A	8082A
Dilution Factor:	15	14	15	14	15
PCB-1016	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1221	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1232	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1242	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1248	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1254	< 0.2	< 0.2	< 0.2	**0.76**	**1.8**
PCB-1260	< 0.2	< 0.2	< 0.2	**0.45**	**0.99**
PCB-1262	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
PCB-1268	< 0.2	< 0.2	< 0.2	< 0.2	< 0.2
TMX (surr)	**77 %R**	**69 %R**	**82 %R**	**68 %R**	**86 %R**
DCB (surr)	**52 %R**	**49 %R**	**68 %R**	**58 %R**	**66 %R**

Acid clean-up was performed on the samples and associated batch QC.
Detection limits elevated in response to the lower initial mass used for analysis.
A lower initial mass was used due to the nature of the sample matrix.
Samples were received and analyzed beyond hold time.
Results are reported on an "as received" basis.

Page 1 of 1

CHAIN-OF-CUSTODY RECORD

BOLD FIELDS REQUIRED. PLEASE CIRCLE REQUESTED ANALYSIS.

174881

SAMPLE I.D.	SAMPLING DATE / TIME *IF COMPOSITE, INDICATE BOTH START & FINISH DATE / TIME	MATRIX (SEE BELOW)	GRAB/*COMPOSITE	VOC: 524.2 BTEX; 524.2 MTBE ONLY; 8260 624 1, 4 DIOXANE; 8021 BTEX HALOS; 8015 GRO MAVPH	SVOC: 8270 625 ABN A; SVTICS EDB PAH BN; TPH8100 LI L2; 8015 DRO MAEPH; PEST 608 PEST 8081; PCB 608 PCB 8082; OIL & GREASE 1664 TPH 1664	TCLP: TCLP 1311 VOC; TCLP METALS ABN PEST HERB	METALS: DISSOLVED METALS (LIST BELOW); TOTAL METALS (LIST BELOW)	INORGANICS: TS TSS TDS SPEC. CON.; BR CL F SO4 NO2 NO3 NO2; BOD CBOD T. ALK.; TKN NH3 T. PHOS. O. PHOS.; PH T. RES. CHLORINE; COD PHENOLS TOC DOC; TOTAL CYANIDE TOTAL SULFIDE; REACTIVE CYANIDE REACTIVE SULFIDE FLASHPOINT IGNITABILITY	MICRO: TOTAL COLIFORM E. COLI; FECAL COLIFORM; ENTEROCOCCI HETEROTROPHIC PLATE COUNT	OTHER: # OF CONTAINERS	NOTES MEOH VIAL #
P-1	9/26/17 0940	Soil	G		X						
P-2	9/26/17 1005		G		X						
P-3	9/26/17 1205		G		X						
P-4	9/28/17 1410		G		X						
P-5	9/27/17 0925		G		X						

MATRIX: A-AIR; S-SOIL; GW-GROUND WATER; SW-SURFACE WATER; DW-DRINKING WATER; WW-WASTE WATER

PRESERVATIVE: H-HCL; N-HNO_3; S-H_2SO_4; Na-NaOH; M-MEOH

PROJECT MANAGER: Tim Andrews

COMPANY: Nobis Engineering, Inc.

ADDRESS: 18 Chenell Dr.

CITY: Concord **STATE:** NH **ZIP:** 03301

PHONE: 603-224-4182 **EXT.:**

FAX: 603-224-2507

E-MAIL: TAndrews@nobis-eng.com

SITE NAME: Lis Packard

PROJECT #: 93002.00

STATE: NH MA ME VT **OTHER:**

REGULATORY PROGRAM: NPDES: RGP POTW STORMWATER OR GWP, OIL FUND, BROWNFIELD OR OTHER:

QUOTE #: **PO #:**

DATE NEEDED: Standard TAT

QA/QC REPORTING LEVEL A B C OR PRESUMPTIVE CERTAINTY

REPORTING OPTIONS PRELIMS: YES OR NO

ELECTRONIC OPTIONS E-MAIL PDF EQUIS EXCEL

TEMP. 0.0 °C ICE? (YES) NO

SAMPLER(S): Karl Kumpsaw

RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:
	10/9/17	1535	
RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:
RELINQUISHED BY:	DATE:	TIME:	RECEIVED BY:

METALS: 8 RCRA 13 PP FE, MN PB, CU

OTHER METALS:

SAMPLES FIELD FILTERED? ☐ YES ☐ NO

NOTES: (IE: SPECIAL DETECTION LIMITS, BILLING INFO, IF DIFFERENT)

Soxhlet Extraction

SITE HISTORY:

SUSPECTED CONTAMINATION:

FIELD READINGS:

Eastern Analytical, Inc.
professional laboratory and drilling services
25 CHENELL DRIVE | CONCORD, NH 03301 | TEL: 603.228.0525 | 1.800.287.0525 | E-MAIL: CUSTOMERSERVICE@EASTERNANALYTICAL.COM | WWW.EASTERNANALYTICAL.COM

(WHITE: ORIGINAL GREEN: PROJECT MANAGER)

APPENDIX C

MEL BLACKMAN
MASTER LEAD INSPECTOR

OSHA PRE-RENOVATION/DEMOLITION LEAD BASED PAINT SURVEY

Project:

FORMER MILL BUILDING – MAP 4 LOT 16
BOILER BUILDING – MAP 7 LOT 7
ASHLAND, NEW HAMPSHIRE

Date:

SEPTEMBER 26, 2017

Prepared For:

NOBIS ENGINEERING, INC.
18 CHENELL DRIVE
CONCORD, NH 03301
603-224-4182

Prepared & Inspected By:

MEL BLACKMAN
P O BOX 358
STONEHAM, MA 02180
781-820-8611

MEL BLACKMAN
MASTER LEAD INSPECTOR
P.O. BOX 358 - STONEHAM, MA. 02180
PHONE / FAX (781) 665-3806

1 Executive Summary:

Mel Blackman was retained by Nobis Engineering, Inc. of Concord, New Hampshire to conduct an OSHA pre-renovation/demolition lead based paint survey located in **Ashland, New Hampshire** on **September 26, 2017**. The survey included in place analysis of representative sampling of interior and exterior coated surfaces of the **Former Mill Building, Map 4 Lot 16**, and the **Boiler Building, Map 7 Lot 7.**

The intent of the lead paint survey was to identify specific building surfaces coated with lead based paint, utilizing XRF testing technology. The information collected, as a result of the testing, can be used to ensure OSHA compliance relative to worker exposure and proper disposal of renovation or demolition debris.

Many of the interior and exterior surfaces tested were found to have high contents of lead based paint.

A summary of components coated with any lead based paint can be found in **Section 5**.

The information contained in this report summarizes the sampling and analytical methodologies, site description, materials found to contain lead, locations of surfaces, sample results and qualifications of personnel.

Massachusetts Childhood Lead Poisoning Prevention Program regulations 105 CMR 460.00 defines a dangerous level of lead for residential premises to be equal to or greater than 1.0 milligrams per square centimeter (mg/cm2). The New Hampshire Rules HeP-1600 agrees with Massachusetts, however, refers to that level of lead content as a "lead based substance". OSHA believes that exposure with "any" lead content may pose a potential health risk to workers.

2 Site Description:

The property inspected for the presence of lead based paint is located in **Ashland, New Hampshire** and is presently owned by the **Lakes Region Planning Commission.** The purpose of this survey is to determine the extent of hazardous materials for an upcoming renovation/demolition project.

Surfaces tested consisted walls, doors and trim, windows and trim, structural steel, pipes, ceilings and beams, columns, floors, staircase components, and exterior components.

3 Survey Personnel:

The OSHA survey for lead based paint was conducted by Mel Blackman, Massachusetts licensed Master Lead Inspector #M-1377, and New Hampshire Risk Assessor #RA-0026.

4 Testing Methodology:

Lead in paint sampling of representative surfaces was conducted to assist with contractor compliance with the United States Department of Labor (US DOL) Occupational Safety and Health Administration (OSHA) Lead Exposure in Construction Standard (29 CFR 1926.62), and EPA Hazardous Waste Disposal Regulations (40 CFR Parts 260 through 271), as well as EPA's Renovation, Repair and Painting Final Rule (40 CFR 745), if applicable.

Representative surfaces from selected accessible areas of the properties were analyzed using an X-Ray Fluorescence Analyzer (XRF). An RMD, LPA-1 Lead Paint Analyzer XRF, Serial Number 1409 was used, which is a complete lead paint analysis system that quickly, accurately, and non-destructively measures the concentration of LBP on surfaces.

In conducting the determination, accessible representative architectural elements were tested. Not all painted surfaces in each functional space were reachable to be tested for the presence of lead-based paint. The contractor should assume that similar components that were not tested must be treated with the same caution and requirements as potentially having high lead concentrations.

Surfaces, which are listed as N/A, were not reachable for testing, and therefore the condition of the paint was listed. At least three to ten readings were taken for all similar groups of components.

The LPA-1 XRF relies on the measurement of the K-shell X-rays to determine the amount of lead present in the painted surface. K-shell X-rays can penetrate many layers of paint and allow a good measurement of the lead content of paint to be made without being significantly affected by the thickness or number of layers of paints on the surface of the sample.

The LPA-1 has the ability to analyze and compute corrections for the difference in the energy spectrums relating the different substrates. This analysis of the energy spectrum means that the lead paint reading displayed on the instrument already accounts for any substrate effects and no correction is required by the operator. The LPA-1's field of view is limited to a depth of 3/8", deep enough to handle virtually all painted surfaces, but not prone to detect lead objects located behind the surface.

There are two measurement modes of operation in the LPA-1 analyzer namely the "Standard Mode" and the "Quick Mode". In the "Standard" mode, the operator selects a fixed measurement time that remains constant irrespective of the lead signal. In the "Quick" mode, the analyzer automatically adjusts the measurement time to be the least time that is needed to make a definitive measurement with a 95% confidence level (2 sigma). The LPA-1 analyzer will finish a measurement once the 2-sigma confidence level is achieved and the data is statistically meaningful. This time period for conclusive measurements is typically between 1 to 5 seconds, but can extend to a measurement of 60 seconds depending on the action level for abatement.

I utilized the LPA-1 in the "Quick" mode to achieve a 95% confidence level down to 0.2 mg/cm2 for the testing performed at this unit. The highest level of LBP reported by the LPA-1 using the "Quick" mode is a result of >9.9 mg/cm2 (greater than 9.9 mg/cm2). Calibrations conducted indicated the instrument was functioning within the standard deviation as defined by the manufacturer.

Following the manufacturers' requirements for calibration, here are the results:

Cal. In: A.M. - 1.0, 1.2, 1.1 mg/cm2
Cal. Out: A.M. - 1.1, 1.0, 1.0 mg/cm2
Cal. In: P.M. – 1.2, 1.0, 1.0 mg/cm2
Cal. Out: P.M. – 1.0, 1.0, 1.0 mg/cm2

5 Summary of XRF Testing Results:

The following list is arranged by location and component type. Surfaces found to have higher lead concentrations are listed first in each section. The contractor should assume that similar components that were not tested should be treated with the same caution and requirements as potentially having high lead concentrations. Surfaces, which may be listed as N/A, were not reachable for testing, and therefore it is assumed that they contain lead paint. The condition of the majority of painted surfaces containing any concentrations of lead paint is loose.

FORMER MILL BUILDING – MAP 4 LOT 16

INTERIOR – 1ST FLOOR

Yellow metal support columns 1.4 – 4.9 mg/cm2 loose
Green and white metal round columns 0.3 – 2.2 mg/cm2 loose
Green concrete support column bases 0.7 – 1.4 mg/cm2 loose
White and green metal support columns and structural steel 0.4 – 1.4 mg/cm2
Green and white wood columns 0.3 – 0.7 mg/cm2
Gray and white metal columns 0.5 – 0.7 mg/cm2
Gray metal windows 0.0 – 0.3 mg/cm2
Green wood door and trim 0.0 – 0.3 mg/cm2
White and gray brick walls 0.2 – 0.5 mg/cm2
White and gray cinderblock and concrete walls 0.0 – 0.3 mg/cm2
White and gray wood walls 0.0 – 0.2 mg/cm2

INTERIOR – 2ND FLOOR

Yellow and white metal columns and structural steel 4.0 – 5.7 mg/cm2 loose
Yellow metal round columns 2.9 – 4.6 mg/cm2 loose
Green, white, and gray wood support columns 0.3 – 0.5 mg/cm2
Gray metal windows 0.2 – 0.5 mg/cm2
White and green wood walls 0.1 – 0.3 mg/cm2
Gray concrete floor 0.0 – 0.3 mg/cm2

INTERIOR – 3RD FLOOR

Gray metal sliding fire door 9.9 mg/cm2
Yellow metal round column 2.3 – 4.0 mg/cm2 loose
White, gray, and green wood walls 2.2 – 3.5 mg/cm2
White and green brick walls 0.6 – 0.8 mg/cm2

Green and white wood door trim 0.2 – 0.5 mg/cm2
Beige wood ceiling and beams 0.2 – 0.5 mg/cm2
Gray metal windows 0.0 – 0.7 mg/cm2
White and gray metal "I" beams 0.3 – 0.5 mg/cm2
Gray and white wood window trim 0.1 – 0.4 mg/cm2

BASEMENT

White metal structural steel 0.2 – 1.4 mg/cm2 loose
Yellow metal staircase rails 0.7 – 1.1 mg/cm2 loose
Brown wood windows and trim 0.4 – 0.7 mg/cm2
White metal pipes 0.3 – 0.6 mg/cm2
White cinderblock and concrete walls 0.1 – 0.4 mg/cm2
Gray metal ceiling 0.2 – 0.4 mg/cm2
White brick walls 0.2 – 0.4 mg/cm2
Red metal pipes 0.0 – 0.3 mg/cm2

STAIRCASE 1ST FLOOR TO ATTIC

Green wood door and trim 9.9 mg/cm2 loose
White wood newel posts and columns 2.2 – 5.7 mg/cm2 loose
White wood railing cap 2.3 – 5.8 mg/cm2 loose
Green wood walls 3.7 – 5.5 mg/cm2 loose
White wood risers 1.2 – 3.0 mg/cm2 loose
Yellow metal rail 1.6 – 2.9 mg/cm2 loose
White and green brick walls 1.0 – 3.3 mg/cm2 loose
Brown and yellow wood treads 0.2 – 0.5 mg/cm2

RAMP 2ND TO 3RD FLOOR

Yellow metal rails 1.9 – 2.8 mg/cm2 loose
Gray metal support columns 0.1 – 0.5 mg/cm2
Gray wood walls 0.1 – 0.3 mg/cm2

EXTERIOR

Green wood loading dock door and trim 2.5 – 3.7 mg/cm2
White wood walls 0.1 – 0.4 mg/cm2
White metal siding on loading dock 0.0 – 0.3 mg/cm2
White cinderblock walls 0.1 – 0.3 mg/cm2
White metal walls 0.0 – 0.2 mg/cm2
White asbestos shingles 0.0 – 0.2 mg/cm2

BOILER BUILDING – MAP 7 LOT 7

INTERIOR

NOTE: DUE TO UNSAFE CONDITIONS NOT ALL COMPONENTS WERE ACCESSABLE FOR TESTING

Green wood exterior sides of windows and trim 1.8 – 2.0 mg/cm2 loose
Green metal sliding fire door 1.4 – 1.8 mg/cm2 loose
Yellow metal rails on staircase 1.0 – 1.2 mg/cm2 loose
Gray brick walls 0.3 – 0.5 mg/cm2
Gray concrete walls 0.1 – 0.3 mg/cm2

EXTERIOR

Green wood upper building trim N/A loose
Green metal sliding door and trim 1.8 – 5.5 mg/cm2 loose
White and green wood overhead door trim 3.2 – 3.9 mg/cm2 loose
Gray brick walls 2.5 – 3.0 mg/cm2 loose
White wood overhead door 0.3 – 0.5 mg/cm2
Green wood siding 0.2 – 0.4 mg/cm2
Green metal door and trim 0.0 – 0.2 mg/cm2

Conclusions and Recommendations:

Many of the surfaces tested contain high levels of lead paint. A composite sampling of the aggregate waste stream from demolition would be necessary to determine whether the TCLP testing is considered hazardous waste.

Prior to demolition, an OSHA site specific lead compliance plan should be developed including wasted segregation to minimize the potential generation of hazardous waste.

In areas where demolition is to occur and lead is present, the demolition debris waste stream should be further analyzed during segregation for compliance with EPA and NH DEP regulations to ensure proper disposal.

TCLP testing should be performed to characterize all waste prior to disposal. TCLP testing can be performed prior to waste segregation but results may not be indicative of the actual waste streams produced during demolition.

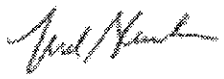
Demolition/renovation workers should be trained and protected in accordance with OSHA regulations 29 CFR 1926.62 and, if applicable, EPA's Renovation, Repair and Painting Final Rule (40 CFR 745), if applicable.

This section applies to all construction work where an employee may be occupationally exposed to lead. All construction work excluded from coverage in the general industry for lead by 29 CFR 1910.1025 (a)(2) is covered by this standard.

Construction work is defined as work for construction, alteration and/or repair, including painting and decorating. It includes but is not limited to the following:

- Demolition or salvage of structures where lead or materials containing lead is present
- Removal or encapsulation of materials containing lead
- New Construction, alteration, repair, or renovation of structures, substrates, or portions thereof that contain lead, or materials containing lead.
- Handlers of salvageable materials and the treatment/disposal facility must be informed of the material's lead content. All personnel involved must be trained in personal protection and proper work practice procedures in accordance with OSHA regulations.
- All waste contaminated with lead paint should be disposed of in accordance with all state, local, and federal regulations.

Respectfully submitted



Mel Blackman