



The Scott Lawson Group, Ltd.  
Environmental, Health & Safety Consultants

October 30, 2014

Mr. Alan Miller, Facilities Manger  
School Administrative Unit No. 28 - Pelham School District  
19 Haverhill Road  
Windham, New Hampshire 03087

Re: NESHAP Asbestos Survey – Pelham High School  
SLGL File Number 14-3117

Dear Mr. Miller:

### EXECUTIVE SUMMARY

On August 13, 2014, an Asbestos Survey was conducted by *The Scott Lawson Group, Ltd. (SLGL)*, at the High School in Pelham, New Hampshire. *SLGL* was contracted by SAU #28 for the purpose of identifying the type, quantity, and locations of Asbestos-Containing Building Materials (ACBM). The Survey was completed in anticipation of planned renovations to the building and to comply with State and Federal (NESHAP) regulations that require a thorough inspection prior to renovations and demolition. **NOTE:** *SLGL* also utilized the results from previous inspections completed per the United States Environmental Protection Agency Asbestos Hazard Emergency Response Act (U.S. EPA AHERA) regulation for schools.

#### Summary of Findings

Based on the site inspections and analytical results, Asbestos-Containing Materials (ACM) **were identified** on the interior and exterior of the building. Materials found to contain greater than one percent (> 1%) Asbestos by dry-weight, are considered to be Asbestos-containing. The ACM identified included: floor tiles and mastics, Linoleum flooring, Cement Board (fume hoods), Joint Compound, and exterior water proofing material. The ACM must be abated prior to renovation/demolition of the structure if ACM is to be impacted.

## DISCUSSION

During SLGL's walkthrough of the various sections of the building on August 13, 2014, eleven (11) homogenous groups of suspect ACM were identified on the interior and exterior of the building. Thirty-eight (38) samples were collected from the different homogenous groups of suspect materials. This section offers a description of the estimated quantities of ACM identified. {This data is provided for informational purposes only, and is based on the best information available at the time of the on-site survey.} The analytical results for all the samples collected during the survey may be found in the attached bulk sample analysis report in Appendix A.

**TABLE I - ACM at The Pelham High School**

Location	ACM Description	Approximate Quantity
Maintenance Garage	Generator Exhaust	6 LF
Kitchen	Linoleum	400 ft
Cafeteria	Brown Floor Tile and Mastic	3,500 ft
Room 2	White Floor Tile and Mastic	1,730 ft
Rooms 3 & 4	Brown Floor Tile and Mastic	2,240 ft
Room 5	Brown Floor Tile and Mastic	800 ft
Room 6	Brown Floor Tile and Mastic	960 ft
SPED & Misc. Rooms, by Rooms 6 & 7	Brown Floor Tile and Mastic	660 ft
Guidance	Brown Floor Tile and Mastic	1,300 ft
Nurse	Brown Floor Tile and Mastic	150 ft
Main Office	Brown Floor Tile and Mastic	125 ft
Room 8	Brown Floor Tile and Mastic	700 ft
Teachers Work Room	Brown Floor Tile and Mastic	1,520 ft
Corridors	Brown Floor Tile and Mastic	1,900 ft
Room 22 Science	Asbestos-cement Board Fume Hoods (2)	30 ft
Second Floor, Work Room By Room 34	Brown Floor Tile and Mastic	160 ft
Room 33	Brown Floor Tile and Mastic	1200 ft <sup>2</sup>
*Through-out	Joint Compound	Through-out
Exterior	Water Proofing Material	Exterior

ft<sup>2</sup> = Square feet, LF=Linear Feet

\* Please note, In reference to the Environmental Protection Agency ( EPA ) 40 CFR Part 61 “Asbestos NESHAP Clarification Regarding Analysis of Multi-Layered Systems - When joint compound and/or tape is applied to wallboard it becomes an integral part of the wallboard and in effect becomes one material forming a wall system. Therefore, where a demolition or renovation impacts such a wall system, a composite analysis of the wall system (percent of asbestos in the joint compound, tape and wallboard) can be conducted.” Therefore, at the request of SAU #28 under the guidance and direction of The Scott Lawson Group (SLGL), some of the joint compound samples, with reported lab results at 2% Asbestos during the original Survey, were re-analyzed as a composite sample. The joint compound was analyzed together with the gypsum wallboard samples that were taken on the day of the Survey. Laboratory Results of the composite samples for the Joint Compound and Wallboard material came back at < 1% indicating the material can be treated as normal demolition debris.

Non-Asbestos Materials:

No Asbestos was detected as a result of the laboratory analysis of the following suspect materials.

**TABLE II - Non-ACM at The Pelham High School**

<b>Suspect Material</b>	<b>General Location</b>
Roofing Materials	Exterior
Window Glazing	Throughout
Suspended Ceiling Tiles	Throughout
Ceiling and Wall Gypsum Board	Throughout
Pipe Fitting Insulation	Throughout
Blue Floor Tile and Mastic	Various locations
Caulking Material	Expansion Joints-1st floor ceiling
Cove Base Mastics	Throughout
Stucco Wall Coating	Exterior
Acoustical Panels	Gym
Door Caulking	Back Entrance Door
Ceiling and Wall Gypsum Board	Throughout
Pipe Fitting Insulation	Throughout

\* At the request of SAU #28, *SLGL* collected a paint chip sample of the Steel Building Structure to determine the presence of Lead. Lead paint results were **below** the HUD guideline for Lead (greater than 0.5 percent [ $> 0.5\%$ ] Lead by dry weight).

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## CONCLUSION

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The NESHAP Asbestos Materials Survey for the Pelham High School has been completed. ACM was identified in the form of floor tiles and mastics, Linoleum flooring, Cement Board (fume hoods), Joint Compound, and exterior water proofing material.

The ACM must be properly handled during building renovations or demolition activities.

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## RECOMMENDATION

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Based on the results of this Survey, *SLGL* has the following general recommendation:

- State and Federal regulations require the removal of ACM prior to demolition/renovation activities. Asbestos abatement work must be conducted by trained and licensed Asbestos abatement contractors and be conducted in accordance with the applicable State and Federal regulations.

Thank you for utilizing the services of *The Scott Lawson Group, Ltd.* We trust that you will find everything in order; however, should you have any questions or comments regarding the contents of this report, the inspection or the analytical reports, please feel free to contact me at your earliest convenience.

Sincerely,

*The Scott Lawson Group, Ltd.*

Jeff Brown  
Manager of Technical Services

Enclosures

### WARRANTY

The conclusions and recommendations contained in this report are based on the information available to *SLGL* as of August 13, 2014. *SLGL* provides no warranties on information provided by third parties and contained herein. Data compiled were in accordance with *SLGL's* approved scope of services and should not be construed beyond their limitations. Any interpretations or use of this report other than those expressed herein are not warranted. The use, partial use, or duplication of this report without the expressed written consent of *The Scott Lawson Group, Ltd.*, is strictly prohibited.

**APPENDIX A1**

**ANALYSIS REPORT**

**Asbestos Bulk Samples**

## **APPENDIX A2**

### **ANALYTICAL RESULTS**

#### **Lead Paint Chip Sample**