AHERA - THREE YEAR REINSPECTION



ROWING FACILITY

1 MADISON STREET
ALEXANDRIA, VIRGINIA 22304

ECS PROJECT NO. 47:11652-E4-19

FOR: ALEXANDRIA CITY PUBLIC SCHOOLS

SEPTEMBER 8, 2025

September 8, 2025

Mr. Lee Conroy
Alexandria City Public Schools
1719 North Beauregard Street
Alexandria, Virginia 22311

ECS Project No. 47:11652-E4-19

Reference: AHERA - Three Year Reinspection, Rowing Facility, 1 Madison Street, Alexandria, Virginia

Dear Mr. Conroy:

ECS Mid-Atlantic, LLC (ECS) is pleased to provide Alexandria City Public Schools with the results of the above referenced AHERA - Three Year Reinspection performed at Rowing Facility located at 1 Madison Street in Alexandria, Virginia.

Previous asbestos surveys of the facility identified asbestos-containing materials. ECS performed a walk through of the school to observe present conditions.

This report summarizes our observations, findings, and recommendations related to the work performed. The work described in this report was performed by ECS in general accordance with the Scope of Services described in ECS Proposal Number 47:39012-EP and the terms and conditions of the agreement authorizing those services.

ECS appreciates this opportunity to provide Alexandria City Public Schools with our services. If we can be of further assistance to you, please do not hesitate to contact us.

Sincerely,

ECS Mid-Atlantic, LLC

Adam Truax
Environmental Senior Project Manager
atruax@ecslimited.com
540-667-3750

Christopher J. Chapman, CIH
Director of Industrial Hygiene
cchapman@ecslimited.com
804-767-5102

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1.0 SITE DESCRIPTION

The subject property consists of Rowing Facility, a three-story metal and wood training facility located at 1 Madison Street in Alexandria, Virginia. The facility was originally constructed in 1986 and has been improved with renovation and additions in 2005, 2007, and 2018. Building finishes observed included concrete slab floors, vinyl floor tiles, and/or ceramic tiles; the wall systems appeared to generally consist of concrete masonry unit (CMU) block walls, drywall wallboard, and/or ceramic wall tiles; and the ceiling systems appeared to generally consist of suspended drop ceilings with ceiling tiles and some plaster finishes

Note: Based on the age of the structure, it is likely that asbestos insulation on piping and ductwork could be present and concealed behind solid walls/above solid ceilings.

2.0 PURPOSE

The purpose of this Asbestos Hazard Emergency Response Act (AHERA) three-year re-inspection of asbestos-containing materials was to assess previously identified asbestos-containing building materials (ACBMs) present on the subject property. The survey was performed on the interior areas of the subject building. This survey is intended to provide a supporting document for the AHERA management plan.

3.0 METHODOLOGY

ECS performed the authorized Scope of Services in general accordance with our proposal, standard industry practice(s) and methods specified by regulation(s) for the identification of Asbestos-Containing Materials (ACMs).

3.1 Asbestos Re-Inspection

The AHERA re-inspection survey was performed by William Sargent, a Virginia licensed asbestos inspector (license number 3303005062) who has received EPA-accredited training.

Before conducting the re-inspection, ECS reviewed existing inspection reports and then walked through areas where previously friable or non-friable ACBM were reported to be located, including assumed materials.

The scope of work for the re-inspection included the following items:

- Review the existing management plan to determine the areas requiring re-inspection (not available).
- Visually reinspect and reassess the condition of known or assumed friable ACBM.
- Visually reinspect known or assumed non-friable ACBM and determine if it has become friable.
- Identify homogeneous areas that have changed conditions since previous re-inspections.
- Identify renovations or new materials that have been added to the building since the previous inspection.

At the request of the client, ECS did not sample additional materials during this inspection.

4.0 RESULTS

The following is a summary of laboratory results, findings and observations.

4.1 Asbestos-Containing Materials

An Asbestos-Containing Material (ACM) is defined as any material containing more than one percent (>1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, PLM. Materials are categorized by the U.S. EPA in the following categories:

- Friable ACMs are defined as any ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure.
- Non-friable ACMs are defined as any ACM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
    - Category I non-friable ACM are listed as following: packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than one percent (>1%) asbestos.
    - Category II non-friable ACM are listed as any material, excluding Category I non-friable ACM, containing more than one percent (>1%) asbestos.

Regulated Asbestos Containing Materials (RACM) are friable ACM or non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading or has crumbled, been pulverized, or reduced to powder in the course of renovation and/or demolition operations.

A table of previously identified ACBM in the building is appended to this report.

5.0 RECOMMENDATIONS AND REGULATORY REQUIREMENTS

Based on our understanding of the purpose of the AHERA - Three Year Reinspection, and our findings and observations, ECS presents the following recommendations.

5.1 Asbestos-Containing Materials

ECS notes that the management plan was not observed on-site at the time of this survey. ECS recommends that a copy of the management plan be moved to the facility.

All known ACM materials identified in the plan that were observed by ECS during this survey were found to be in good to fair condition. No action is required. Continue management under the O&M Plan for the school.

If ACMs are to be removed, it is recommended that an industrial hygienist monitor the project. This involves collecting air samples from within and outside abatement work areas to monitor the asbestos abatement contractor's work practices over the course of the project. Only after the industrial hygienist has determined the identified ACMs have been removed should final clearance air samples be collected.

For any future renovation project, a more in-depth survey should be performed for asbestos in the path of construction. Where asbestos is found, an asbestos abatement plan should be prepared by an accredited professional as outlined in AHERA prior to performing any asbestos removal work.

The results of this survey should be added to the school's AHERA management plan.

6.0 LIMITATIONS

The conclusions and recommendations presented within this report are based upon a reasonable level of assessment within normal bounds and standards of professional practice for a site in this particular geographic setting. ECS is not responsible or liable for the discovery and elimination of hazards that may potentially cause damage, accidents, or injuries.

The observations, conclusions, and recommendations pertaining to environmental conditions at the subject site are necessarily limited to conditions observed, and/or materials reviewed at the time this study was undertaken. No warranty, expressed or implied, is made with regard to the conclusions and recommendations presented within this report. This report is provided for the exclusive use of the client. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties without the written consent of ECS and the client.

Our recommendations are in part based on federal, state, and local regulations and guidelines. ECS does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, state, or federal public agencies, any conditions at the site that may present a potential danger to public health, safety, or the environment. Under this scope of services, ECS assumes no responsibility regarding any response actions initiated as a result of these findings. General compliance with regulations and response actions are the sole responsibility of the Client and should be conducted in accordance with local, state, and/or federal requirements.

Appendix I: AHERA ACBM Tables

MATERIAL	LOCATION	FRIABILITY	CONDITION	COMMENTS	LAST INSPECTION DATE	RECOMMENDATION	SEMI-ANNUAL INSPECTION DATE	REMARKS
MATERIALS REPORTED AS ASBESTOS-CONTAINING MATERIALS ON PRIOR SURVEYS THAT WERE NOT IDENTIFIED/OBSERVED BY ECS IN JULY 3, 2025 SURVEY								
Interior White Door Caulk	1st Floor Stairwell and 2nd Floor Gym Area	NF	N/A	This material is assumed to be located in other areas.	3-Jul-25	Maintain in O & M Plan	3-Jul-25	5% Chrysotile
Interior White Expansion Joint Caulk	2nd Floor Gym Area and 1st Floor W	NF	N/A	This material is assumed to be located in other areas.	3-Jul-25	Maintain in O & M Plan	3-Jul-25	3% Chrysotile
MATERIALS ASSUMED TO CONTAIN ASBESTOS								
Pipe Flange Gaskets	Throughout the Building	Unknown	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Electrical Panels: Transite Components	Mechanical Rooms	NF	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Thermal System Insulation	Throughout building behind Solid Walls and Ceiling	F	N/A	PACM Until Tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Mirror Mastic	Bathrooms	NF	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Interior Pipe Wrap associated with Water Fountains and Radiators	Throughout the Building	NF	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Waterproofing Membranes/Mastics	Behind Interior Finishes, Exterior Veneer and/or Subgrade Walls, and Under Ceramic Flooring	NF	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered
Asphalt-Based Roofing Material and Caulks/Sealants	Roof	NF	N/A	PACM until tested	3-Jul-25	Maintain in O & M Plan	3-Jul-25	Sampling if encountered/uncovered

Notes: F = Friable; NF = Non-Friable; PACM = Presumed Asbestos Containing Material; O & M Plan = Operations and Maintenance Plan; NAD = No Asbestos Detected.

Appendix II: Certifications/ Licenses

DPOR License Lookup License Number 3303005062

License Details

Name	SARGENT, WILLIAM TAIGA
License Number	3303005062
License Description	Asbestos Inspector License
Rank	Asbestos Inspector
Address	ROCKVILLE, MD 20851
Initial Certification Date	2023-11-29
Expiration Date	2025-11-30

The data located on this website are not the public records of the Department of Professional and Occupational Regulation (DPOR). All public records are physically located at DPOR's Public Records Section: 9960 Mayland Drive, Suite 400, Richmond, VA 23233. While DPOR works to ensure the accuracy of the data provided online, the data available on these pages are updated routinely but may not be up to date at all times (due to document processing delays, technical maintenance, etc.).

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DPOR License Lookup License Number 3304001722

License Details

Name	TRUAX, ADAM MICHAEL
License Number	3304001722
License Description	Asbestos Management Planner License
Rank	Asbestos Management Planner
Address	RANSON, WV 25438
Initial Certification Date	2023-03-30
Expiration Date	2026-03-31

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DPOR assumes no liability for any errors, omissions, or inaccuracies in the information provided or for any reliance on data provided online. While DPOR has attempted to ensure that the data contained herein are accurate and reflect the status of its regulants, DPOR makes no warranties, expressed or implied, concerning the accuracy, completeness, reliability, or suitability of this data. If discrepancies or errors are discovered, please inform DPOR so that appropriate action may be taken.

DPOR License Lookup build 1,524 (built 2025-04-18 11:59:26).

Appendix III: Previous Reports

AHERA ASBESTOS-CONTAINING MATERIALS SURVEY



DEE CAMPBELL ROWING FACILITY

1 MADISON STREET
ALEXANDRIA, VIRGINIA 22301

ECS PROJECT NO. 47:11652-E2

FOR: ALEXANDRIA CITY PUBLIC SCHOOLS

MAY 4, 2022

May 4, 2022

Mr. John Contreras
Alexandria City Public Schools
1340 Braddock Place
Alexandria, Virginia 22314
john.contreras@acps.k12.va.us

ECS Project No. 47:11652-E2

Reference: AHERA Asbestos-Containing Materials Survey, Dee Campbell Rowing Facility, 1 Madison Street, Alexandria, Virginia

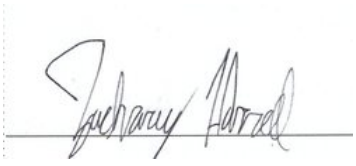
Dear Mr. Contreras:

ECS Mid-Atlantic, LLC (ECS) is pleased to provide Alexandria City Public Schools with the results of the above referenced AHERA Asbestos-Containing Materials Survey performed at the Dee Campbell Rowing Facility located at 1 Madison Street in Alexandria, Virginia. This report summarizes our observations, analytical results, findings, and recommendations related to the work performed. The work described in this report was performed by ECS in general accordance with the Scope of Services described in ECS Proposal Number 47:16069-EP and the terms and conditions of the agreement authorizing those services.

ECS appreciates this opportunity to provide Alexandria City Public Schools with our services. If we can be of further assistance to you, please do not hesitate to contact us.

Sincerely,

ECS Mid-Atlantic, LLC





Zach Harrell
Environmental Technician
zharell@ecslimited.com
571-334-3350

Christopher J. Chapman, CIH
Director of Industrial Hygiene
cchapman@ecslimited.com
804-767-5102

EXECUTIVE SUMMARY

The subject property consists of Dee Campbell Rowing Center, a three-story metal and wood training facility building located at 1 Madison Avenue in Alexandria, Virginia. The facility was originally constructed in 1986 and has been improved with renovation and additions in 2005, 2007, and 2018. Building finishes observed included concrete sub-floors, vinyl floor tiles, and/or ceramic tiles; the wall systems appeared to generally consist of concrete masonry unit (CMU) block walls, drywall wallboard, and/or ceramic wall tiles; and the ceiling systems appeared to generally consist of suspended drop ceilings with ceiling tiles and some plaster finishes.

The purpose of the survey was to determine if asbestos-containing building materials (ACBMs) present on the subject property. The survey was performed within interior areas of the school building excluding the roofs and exterior materials. This survey is intended to provide a supporting document for the Asbestos Hazard Emergency Response Act (AHERA) management plan for the building.

Based on the laboratory analysis of the bulk samples collected during the survey, the following materials were reported to contain asbestos:

- Interior White Door Caulk present in 1st Floor Stairwell and 2nd Floor Gym Area
- Interior White Expansion Joint Caulk present in 2nd Floor Gym Area, and 1st Floor Warehouse

Recommendations regarding the removal and disposal of the ACMs identified by ECS can be found in Section 5.0 of this report. The executive summary is an integral portion of this report, however, ECS recommends the report be read in its entirety.

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1.0 SITE DESCRIPTION

The subject property consists of Dee Campbell Rowing Center, a three-story metal and wood training facility building located at 1 Madison Avenue in Alexandria, Virginia. The facility was originally constructed in 1986 and has been improved with renovation and additions in 2005, 2007, and 2018. Building finishes observed included concrete slab floors, vinyl floor tiles, and/or ceramic tiles; the wall systems appeared to generally consist of concrete masonry unit (CMU) block walls, drywall wallboard, and/or ceramic wall tiles; and the ceiling systems appeared to generally consist of suspended drop ceilings with ceiling tiles and some plaster finishes.

2.0 PURPOSE

The purpose of this Asbestos Hazard Emergency Response Act (AHERA) asbestos re-inspection was to determine if asbestos-containing building materials (ACBMs) are present on the subject building that had not been previously identified, to account for the ACMs previously identified with regards to their general location and condition, and finally to generally identify if any of the previously noted ACMs had been abated. The survey was performed within interior areas of the subject building. Exterior and roofing materials were not included in this survey. This survey is intended to provide a supporting document for the AHERA management plan for the school.

US EPA AHERA regulations requires all public and private schools to survey school buildings and associated support school buildings for ACMs, and to prepare management plans for identified ACMs.

3.0 METHODOLOGY

ECS performed the authorized Scope of Services in general accordance with our proposal, standard industry practice(s) and methods specified by regulation(s) for the identification of Asbestos-Containing Materials (ACMs).

3.1 Asbestos-Containing Materials

The non-invasive asbestos survey was performed by asbestos inspectors who have received EPA accredited training and are licensed by the Commonwealth of Virginia. Samples of suspect ACMs were collected utilizing hand tools and placed into individual, labeled plastic bags. Unique bulk suspect ACM samples were submitted to Scientific Analytical Institute, Inc. (SAI) in Greensboro, North Carolina for analysis via Polarized Light Microscopy (PLM) in accordance with current EPA-600 methodology. Materials consisting of additional layers were analyzed separately. Scientific Analytical Institute, Inc. (SAI) is listed as an accredited laboratory by the National Voluntary Laboratory Accreditation Plan (NVLAP) managed by the National Institute of Standards and Technology (NIST) for bulk sample analysis by currently approved EPA methodology by PLM.

During the survey, ECS attempted to identify suspect ACMs in readily accessible areas. However, due to the destructive means required to identify some materials, certain areas were deemed inaccessible (i.e. behind walls or sub grade materials) and were not surveyed for suspect ACMs. It is important to note that due to the COVID-19 pandemic, extra precautions were taken in order to avoid contact with students and staff, increasing the number of areas deemed inaccessible. Unidentified suspect ACMs may be located in these and/or other inaccessible areas.

Samples were collected in general accordance with EPA Standard 40 CFR 763 Subpart E, Asbestos Hazard Emergency Response Act (AHERA) and OSHA Standard 29 CFR 1926.1101 Inspection Protocol. Multiple samples of each unique material were submitted. Samples were analyzed using "Positive Stop" methodology. If one sample of a homogeneous material is reported to contain asbestos, the remaining samples of that material are not analyzed. EPA regulations stipulate that if one sample contains asbestos the entire quantity of that material contains asbestos, regardless of additional analysis.

4.0 RESULTS

The following is a summary of laboratory results, findings and observations.

4.1 Asbestos-Containing Materials

An Asbestos-Containing Material (ACM) is defined as any material containing more than one percent (>1%) asbestos as determined using the method specified in Appendix E, Subpart E, 40 CFR Part 763, Section 1, PLM. Materials are categorized by the U.S. EPA in the following categories:

- Friable ACMs are defined as any ACM that, when dry, can be crumbled, pulverized or reduced to powder by hand pressure.
- Non-friable ACMs are defined as any ACM that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
    - Category I non-friable ACM are listed as following: packings, gaskets, resilient floor coverings, and asphalt roofing products containing more than one percent (>1%) asbestos.
    - Category II non-friable ACM are listed as any material, excluding Category I non-friable ACM, containing more than one percent (>1%) asbestos.

Regulated Asbestos Containing Materials (RACM) are friable ACM or non-friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading or has crumbled, been pulverized, or reduced to powder in the course of renovation and/or demolition operations.

AHERA requires identified asbestos-containing building materials (ACBMs) to be categorized by a trained AHERA inspector into the following categories:

• (1) Damaged or significantly damaged thermal system insulation ACBM.
• (2) Damaged friable surfacing ACBM.
• (3) Significantly damaged friable surfacing ACBM.
• (4) Damaged or significantly damaged friable miscellaneous ACBM.
• (5) ACBM with potential for damage.

• (6) ACBM with potential for significant damage.
• (7) Any remaining friable ACBM or friable suspected ACBM.

Definitions for the above-referenced categories can be found in the Appendices.

Scientific Analytical Institute, Inc. (SAI) submitted a signed final laboratory report to ECS on October 18, 2021. Two of the bulk samples submitted for analysis were reported to contain asbestos in detectable concentrations. These materials are summarized below. A complete list of the sampled materials submitted for analysis and sample locations are located in the Appendix of this report. Additional details regarding the overall locations of the materials identified as asbestos-containing are provided further in the report. Photographs of collected samples reported as asbestos-containing are also located in the Appendix of this report.

In total, 25 bulk samples from homogeneous areas were submitted to the laboratory of which 34 layers were analyzed.

Summary of Asbestos-Containing Materials Identified

Location	Material Description	Analytical Result	EPA Category	AHERA Category
1st Floor Stairwell and 2nd Floor Gym Area	Interior White Door Caulk	5% Chrysotile	Category II Non-Friable	Not applicable
2nd Floor Gym Area, and 1st Floor Warehouse	Interior White Expansion Joint Caulk	3% Chrysotile	Category II Non-Friable	Not applicable

Summary of Non Asbestos-Containing Materials Identified

Location	Material Description	Analytical Results
Materials Sampled in 2021 AHERA Survey		
2nd Floor Gym Area	Interior White Window Caulk	NAD
1st Floor Stairwell, 2nd Floor Gym Area	Drywall and Joint Compound	Both NAD
2nd Floor Gym Area	Leveling Compound w/ Inseparable Mastic	Both NAD
2nd Floor Gym Area	Clear Floor Mat Mastic Gray Leveling Compound and Brown Mastic	Both NAD
2nd Floor Gym Area	4" Black Cove Base with Cream Mastic	Both NAD

Location	Material Description	Analytical Results
2nd Floor Men's Locker Room	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Linoleum	Both NAD
1st Floor Sprinkler Room, 1st Floor Electric Room, and 2nd Floor Gym Area	CMU Block Filler	NAD
2nd Floor Hallway	White Carpet Mastic	NAD
2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	Both NAD
Stairwell	Interior White Stair Stringer Caulk	NAD

Notes:
NAD = No Asbestos Detected
Locations reflect the area in which the material was sampled. These materials may be representative of and located in other homogenous areas throughout the school.

Miscellaneous Materials

ECS observed asbestos-containing Interior White Door Caulk in the 1st Floor Stairwell and 2nd Floor Gym Area. This material may be present in similar applications throughout the building, and in inaccessible areas such as behind door frame applications, window applications, etc. This material should be tested if uncovered or scheduled to be disturbed.

Additionally, ECS observed asbestos-containing Interior White Expansion Joint Caulk in the 2nd Floor Gym Area and 1st Floor Warehouse. This material may be present in similar applications throughout the building, and in inaccessible areas such as within the CMU blocks. This material should be tested if uncovered or scheduled to be disturbed.

4.2 Suspect or Assumed Asbestos-Containing Materials

Due to the inaccessibility or the destructive means that asbestos sampling requires, additional suspect ACMs may remain within the building hidden behind inaccessible areas that include, but are not limited to, sub-grade walls, structural members, topping slabs, sub-grade sealants, flooring located below underlayments, areas behind exterior walls, pipe trenches, and subsurface utilities, etc. These areas were deemed inaccessible and were not assessed.

If these materials are discovered during construction activities, they should be presumed to contain asbestos and be treated as ACMs or be sampled immediately upon discovery and prior to disturbance for asbestos content by a certified asbestos inspector in accordance with 29 CFR 1926.1101.

Based upon our past experience in the identification of ACMs in similarly constructed buildings, the following additional suspect ACMs may also be located in inaccessible areas of the structure:

- **Duct Pin Mastic** associated with the HVAC Units.
- **Fire Door and associated Casing Insulation** in locations requiring a rated fire door and door casing.
- Red fire packing on pipe penetrations
- **Mastics** behind/under mirrors and dry-erase/chalk boards.
- **"Transite" Panels** used chalk boards, soffits, panels under windows interior/exterior)
- **Water Fountain Components** in water fountains (mastics, pipe cloth, etc).
- **Thermal System Insulation (TSI)** on pipes within chases behind solid walls, within the inaccessible regions of crawl spaces, above the visible ductwork, or below subgrade.
- **Pipe Flange Gaskets** in heating and plumbing systems.
- **Air Handler Components** in the air handlers (interior components).
- **Vibration Dampener Cloth** associated with HVAC Systems
- **Felt Paper and adhesives** associated with hardwood floors.
- **Asbestos-Cement Pipe Conduit** encased in duct banks and/or below sub-grade.
- **Exterior materials** (roofs, caulks, soffits, vapor barriers, water proofing etc.)

5.0 RECOMMENDATIONS AND REGULATORY REQUIREMENTS

Based on our understanding of the purpose of the AHERA Asbestos-Containing Materials Survey, the results of laboratory analysis, and our findings and observations, ECS presents the following recommendations.

5.1 Asbestos-Containing Materials

ECS recommends where a material type has been identified as asbestos-containing that other materials with similar color, texture, age and size throughout the building's interior and exterior be assumed to contain asbestos. Please refer to Section 4.1 for a complete list of building materials that were reported positive for asbestos and to Section 4.2 for materials that were assumed to contain asbestos.

If the identified ACMs are scheduled to be disturbed in the future, it is recommended that this work be performed by a Commonwealth of Virginia licensed asbestos abatement contractor. The Commonwealth of Virginia requires 20 calendar-days notice prior to an asbestos project involving greater than or equal to 10 linear feet or 10 squared feet. The EPA requires 10 working days notice prior to removal of regulated ACM (RACM) in quantities greater than or equal to 160 square feet, 260 linear feet, or 35 cubic feet. Note that EPA Region III no longer requires notification of asbestos projects but rather request all notification go to the appropriate state agencies. Notification requirements in general will be dependent on the means/methods used by the contractor to abate the material found in the building.

If ACMs are to be removed, it is recommended that an industrial hygienist monitor the project. This involves collecting air samples from within and outside abatement work areas to monitor the asbestos abatement contractor's work practices over the course of the project. The industrial hygienist should evaluate if the asbestos abatement work is in accordance with project specifications, U.S. EPA regulation 40 CFR Part 61-National Emission Standards for Hazardous Air Pollutants Subpart

M: National Emission Standard for Asbestos, and U.S. Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 – Asbestos in Construction. The industrial hygienist should assess each work area to monitor the removal of ACMs. Only after the industrial hygienist has determined the identified ACMs have been removed should final clearance air samples be collected (if necessary).

Suspect ACMs not observed due to inaccessibility or not sampled due to the destructive means that sampling would require may also be encountered during construction activities. At the time of the survey, only limited destructive means were used to locate or sample suspect ACMs; therefore, additional suspect ACMs may remain within inaccessible areas that include, but are not limited to, sub-grade walls, structural members, topping slabs, exterior areas, sub-grade sealants, flooring located below underlayments, vapor barriers, pipe trenches and other subsurface utilities, etc. If additional suspect ACMs are uncovered which were not accessible during this survey, it is recommended that these materials either be assumed to contain asbestos or be sampled prior to disturbance upon discovery for asbestos content by an asbestos inspector in accordance with 29 CFR 1926.1101.

The results of this survey should be added to the school's management plan.

6.0 LIMITATIONS

The conclusions and recommendations presented within this report are based upon a reasonable level of assessment within normal bounds and standards of professional practice for a site in this particular geographic setting. ECS is not responsible or liable for the discovery and elimination of hazards that may potentially cause damage, accidents, or injuries.

During this study, samples were submitted for analysis at an accredited laboratory via polarized light microscopy. As with any similar survey of this nature, actual conditions exist only at the precise locations from which samples were collected. Certain inferences are based on the results of this sampling and related testing to form a professional opinion of conditions in areas beyond those from which the samples were collected. No warranty, expressed or implied, is made.

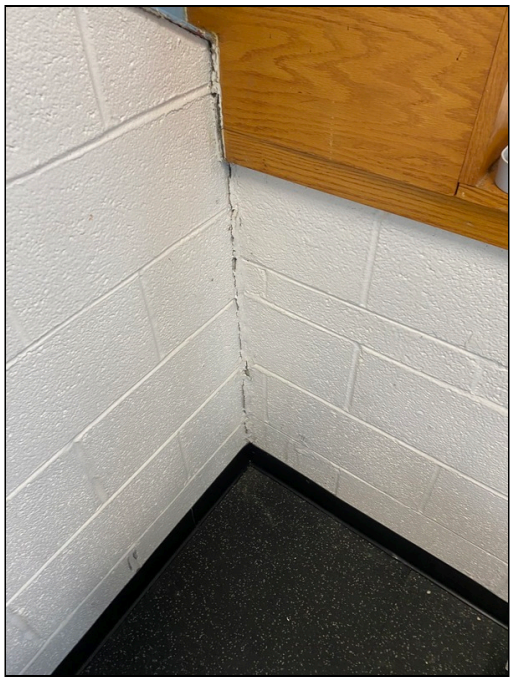
The observations, conclusions, and recommendations pertaining to environmental conditions at the subject site are necessarily limited to conditions observed, and/or materials reviewed at the time this study was undertaken. No warranty, expressed or implied, is made with regard to the conclusions and recommendations presented within this report. This report is provided for the exclusive use of the client. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties without the written consent of ECS and the client.

Our recommendations are in part based on federal, state, and local regulations and guidelines. ECS does not assume the responsibility of the person(s) in charge of the site, or otherwise undertake responsibility for reporting to any local, state, or federal public agencies, any conditions at the site that may present a potential danger to public health, safety, or the environment. Under this scope of services, ECS assumes no responsibility regarding any response actions initiated as a result of these findings. General compliance with regulations and response actions are the sole responsibility of the Client and should be conducted in accordance with local, state, and/or federal requirements.

Appendix I: Figures

Floor Plans Not Provided to ECS

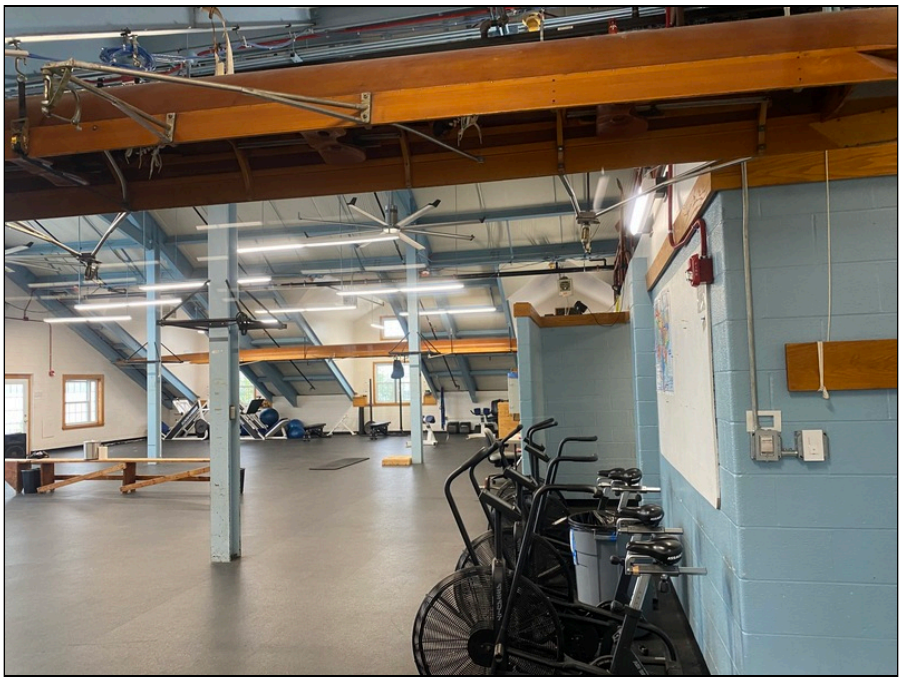
Appendix II: Site Photographs



1 - View of White Expansion Joint Caulk



2 - View of Gym



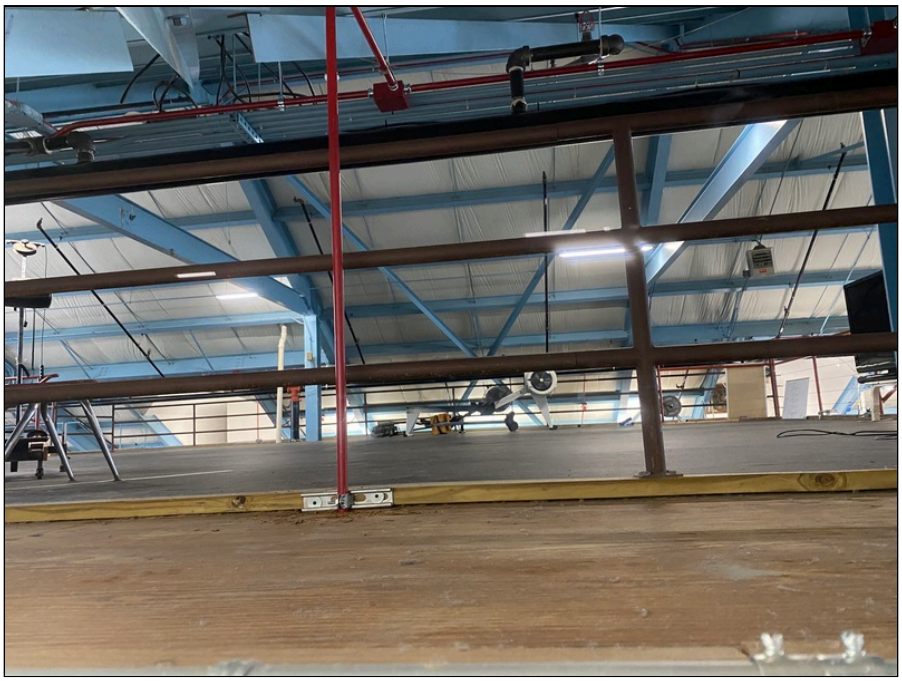
3 - View of Gym 2



4 - View of 12" x 12" White with Blue Fleck Floor Tile with Yellow Mastic (NAD)



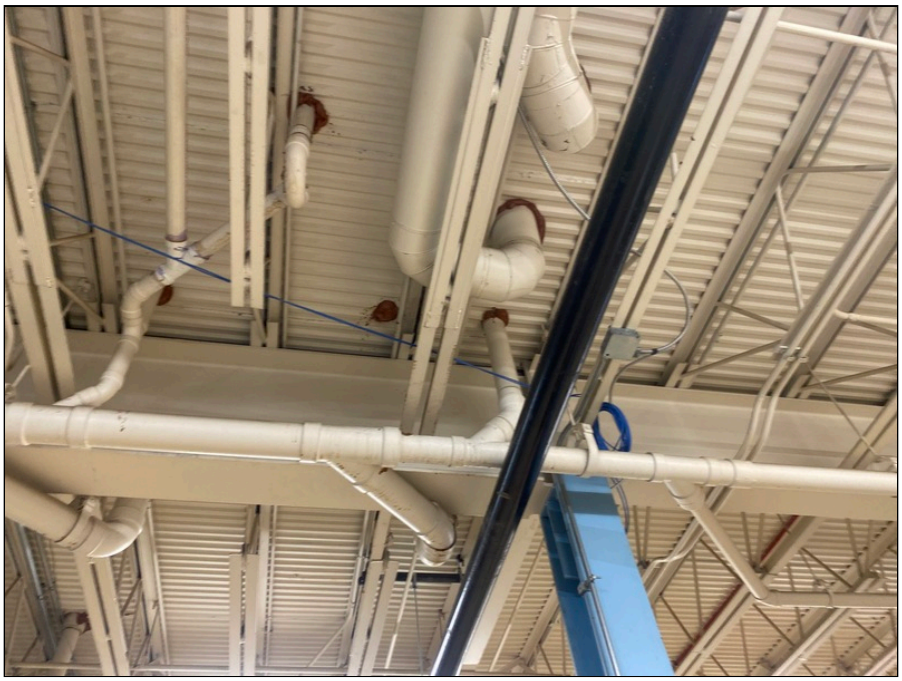
5 - View of Dry wall and Joint Compound



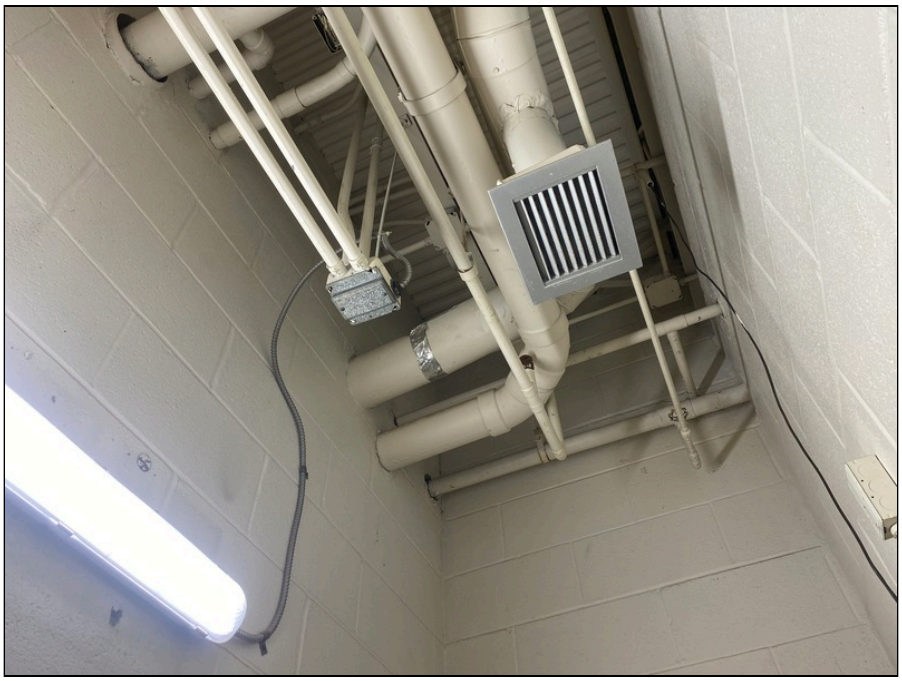
6 - View of Gym Floor



7 - View of Rowing Boat Storage



8 - View of inaccessible Red Pipe Packing



9 - View of inaccessible Duct System



10 - View Boiler Room



11 - View of Exit Door- Interior White Door Caulk (ACM- 5% Chrysotile)



12 - View of Drywall Ceiling (NAD)



13 - View of Interior White Expansion Joint Caulk (ACM- 3% Chrysotile)



14 - View of Leveling Compound



15 - View of 12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum (NAD)

Appendix III: Asbestos Bulk Sample Results

SUSPECT ASBESTOS-CONTAINING MATERIALS BULK SAMPLING RESULTS

Sample #	Sampling Location	Material/Description	Analytical Results
1	2nd Floor Gym Area	Interior White Window Caulk	NAD
2	2nd Floor Gym Area	Interior White Window Caulk	NAD
3	2nd Floor Gym Area	Drywall Ceiling	NAD
4	1st Floor Stairwell	Drywall Ceiling	NAD
5	2nd Floor Gym Area	Drywall Ceiling Joint Compound	NAD
6	1st Floor Stairwell	Drywall Ceiling Joint Compound	NAD
7	2nd Floor Gym Area	ray Leveling Compound, and Brown Mastic- Leveling Compoun	NAD
8	2nd Floor Gym Area	ray Leveling Compound, and Brown Mastic- Leveling Compoun	NAD
9	2nd Floor Gym Area	Interior White Door Caulk	NAD
10	**1st Floor Stairwell**	**Interior White Door Caulk**	**5% Chrysotile**
11	2nd Floor Gym Area	Interior White Expansion Joint Caulk	NAD
12	**1st Floor Warehouse**	**Interior White Expansion Joint Caulk**	**3% Chrysotile**
13-A	2nd Floor Gym Area	4" Black Cove Base with Cream Mastic- Cove Base	NAD
13-B	2nd Floor Gym Area	4" Black Cove Base with Cream Mastic- Mastic	NAD
14-A	2nd Floor Gym Area	4" Black Cove Base with Cream Mastic- Cove Base	NAD
14-B	2nd Floor Gym Area	4" Black Cove Base with Cream Mastic- Mastic	NAD
15-A	nd Floor Men's Locker Roo	ite with Blue Flecked Floor Tile with Brown/Yellow Mastic and L	NAD
15-B	nd Floor Men's Locker Roo	e with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin	NAD
16-A	nd Floor Men's Locker Roo	ite with Blue Flecked Floor Tile with Brown/Yellow Mastic and L	NAD
16-B	nd Floor Men's Locker Roo	e with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin	NAD
16-C	nd Floor Men's Locker Roo	Blue Flecked Floor Tile with Brown/Yellow Mastic and Linoleum-	NAD
17	2nd Floor Gym Area	CMU Block Filler	NAD
18	1st Floor Electric Room	CMU Block Filler	NAD
19	1st Floor Sprinkler Room	CMU Block Filler	NAD
20	2nd Floor Hallway	White Carpet Mastic	NAD
21	2nd Floor Hallway	White Carpet Mastic	NAD
22-A	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Tile	NAD
22-B	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Mastic	NAD

Table Notes:
Bold = Asbestos-Containing Materials
N/A = Not Analyzed
None Detected = No Asbestos Detected

SUSPECT ASBESTOS-CONTAINING MATERIALS BULK SAMPLING RESULTS

Sample #	Sampling Location	Material/Description	Analytical Results
22-C	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Linoleum	NAD
23-A	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Tile	NAD
23-B	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Mastic	NAD
23-C	2nd Floor Men's Locker Room	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum- Linoleum	NAD
24	Stairwell	Interior White Stair Stringer Caulk	NAD
25	Stairwell	Interior White Stair Stringer Caulk	NAD

Table Notes:
Bold = Asbestos-Containing Materials
N/A = Not Analyzed
None Detected = No Asbestos Detected

Appendix IV: Laboratory Report(s)

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E

NVLAP TESTING NVLAP LAB CODE 200664-0

AIHA ACCREDITED LABS.ORG Lab ID # 173190

Customer: ECS Mid-Atlantic, LLC
14026 Thunderbolt Place
Suite 100
Chantilly, VA 20151

Attn: Michael Hamill

Project: 11652-E2/ AHERA Rowing Facility

Lab Order ID: 71976766
Analysis ID: 71976766_PLM
Date Received: 10/13/2021
Date Reported: 10/18/2021

Sample ID *Lab Sample ID*	Description *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes Treatment
1 *71976766PLM_1*	Interior White Window Caulk	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Ashed, Crushed
2 *71976766PLM_2*	Interior White Window Caulk	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Ashed, Crushed
3 *71976766PLM_3*	Drywall Ceiling *drywall: none detect; joint compnd: none detect*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
4 *71976766PLM_4*	Drywall Ceiling *drywall: none detect; joint compnd: none detect*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
5 *71976766PLM_5*	Drywall Ceiling Joint Compound *joint compound only*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
6 *71976766PLM_6*	Drywall Ceiling Joint Compound *joint compound only*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
7 *71976766PLM_7*	Clear Floor Mat Mastic, Gray Leveling Compound, and Brown Mastic *leveling compound w/ inseperable mastic*	**None Detected**		**100% Other**	Gray Non Fibrous Heterogeneous Ashed, Crushed
8 *71976766PLM_8*	Clear Floor Mat Mastic, Gray Leveling Compound, and Brown Mastic *leveling compound w/ inseperable mastic*	**None Detected**		**100% Other**	Gray Non Fibrous Heterogeneous Ashed, Crushed

Disclaimer: Due to the nature of the EPA 600 method, asbestos may not be detected in samples containing low levels of asbestos. We strongly recommend that analysis of floor tiles, vermiculite, and/or heterogeneous soil samples be conducted by TEM for confirmation of "None Detected" by PLM. This report relates only to the samples tested and may not be reproduced, except in full, without the written approval of SAI. This report may not be used by the client to claim product endorsement by NVLAP or any other agency of the U.S. government. Analytical uncertainty available upon request. Scientific Analytical Institute participates in the NVLAP Proficiency Testing program. Unless otherwise noted blank sample correction was not performed. Estimated MDL is 0.1%.

Heather Davide (34)

Analyst

Approved Signatory

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E

NVLAP TESTING NVLAP LAB CODE 200664-0

AIHA ACCREDITED LABS.ORG Lab ID # 173190

Customer: ECS Mid-Atlantic, LLC
14026 Thunderbolt Place
Suite 100
Chantilly, VA 20151

Attn: Michael Hamill

Project: 11652-E2/ AHERA Rowing Facility

Lab Order ID: 71976766
Analysis ID: 71976766_PLM
Date Received: 10/13/2021
Date Reported: 10/18/2021

Sample ID *Lab Sample ID*	Description *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes Treatment
9 *71976766PLM_9*	Interior White Door Caulk	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Ashed, Crushed
10 *71976766PLM_10*	Interior White Door Caulk	**5% Chrysotile**		**95% Other**	Tan Non Fibrous Homogeneous Ashed, Crushed
11 *71976766PLM_11*	Interior White Expansion Joint Caulk	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
12 *71976766PLM_12*	Interior White Expansion Joint Caulk	**3% Chrysotile**		**97% Other**	Tan Non Fibrous Homogeneous Crushed
13 - A *71976766PLM_13*	4" Black Cove Base with Cream Mastic *cove base*	**None Detected**		**100% Other**	Black, Gray Non Fibrous Homogeneous Ashed, Crushed
13 - B *71976766PLM_27*	4" Black Cove Base with Cream Mastic *mastic*	**None Detected**		**100% Other**	Beige Non Fibrous Homogeneous Ashed, Crushed
14 - A *71976766PLM_14*	4" Black Cove Base with Cream Mastic *cove base*	**None Detected**		**100% Other**	Black Non Fibrous Homogeneous Ashed, Crushed
14 - B *71976766PLM_28*	4" Black Cove Base with Cream Mastic *mastic*	**None Detected**		**100% Other**	Beige Non Fibrous Homogeneous Ashed, Crushed

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Heather Davide (34)

Analyst

Approved Signatory

P-F-002 r15 1/16/2021

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E

NVLAP TESTING NVLAP LAB CODE 200664-0

AIHA ACCREDITED LABS.ORG Lab ID # 173190

Customer: ECS Mid-Atlantic, LLC
14026 Thunderbolt Place
Suite 100
Chantilly, VA 20151

Attn: Michael Hamill

Project: 11652-E2/ AHERA Rowing Facility

Lab Order ID: 71976766
Analysis ID: 71976766_PLM
Date Received: 10/13/2021
Date Reported: 10/18/2021

Sample ID *Lab Sample ID*	Description *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes Treatment
15 - A *71976766PLM_15*	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin *tile*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
15 - B *71976766PLM_29*	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin *mastic*	**None Detected**		**100% Other**	Tan, Yellow Non Fibrous Homogeneous Crushed
16 - A *71976766PLM_16*	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin *tile*	**None Detected**		**100% Other**	White Non Fibrous Homogeneous Crushed
16 - B *71976766PLM_30*	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin *mastic*	**None Detected**		**100% Other**	Yellow, Tan Non Fibrous Homogeneous Crushed
16 - C *71976766PLM_35*	12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Lin *vinyl sheet flooring*	**None Detected**	**40% Cellulose**	**60% Other**	Brown, Tan Non Fibrous Homogeneous Ashed, Crushed
17 *71976766PLM_17*	CMU Block Filler	**None Detected**		**100% Other**	White, Gray Non Fibrous Heterogeneous Crushed, Ashed
18 *71976766PLM_18*	CMU Block Filler	**None Detected**		**100% Other**	Gray, White Non Fibrous Heterogeneous Crushed, Ashed
19 *71976766PLM_19*	CMU Block Filler	**None Detected**		**100% Other**	Gray, White Non Fibrous Heterogeneous Crushed, Ashed

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Heather Davide (34)

Analyst

Approved Signatory

P-F-002 r15 1/16/2021

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E

NVLAP TESTING NVLAP LAB CODE 200664-0

AIHA ACCREDITED LABS.ORG Lab ID # 173190

Customer: ECS Mid-Atlantic, LLC
14026 Thunderbolt Place
Suite 100
Chantilly, VA 20151

Attn: Michael Hamill

Project: 11652-E2/ AHERA Rowing Facility

Lab Order ID: 71976766
Analysis ID: 71976766_PLM
Date Received: 10/13/2021
Date Reported: 10/18/2021

Sample ID *Lab Sample ID*	Description *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes Treatment
20 *71976766PLM_20*	White Carpet Mastic *carpet mastic w/ foam*	**None Detected**		**100% Other**	White, Tan Non Fibrous Homogeneous Ashed, Crushed
21 *71976766PLM_21*	White Carpet Mastic	**None Detected**		**100% Other**	Tan Non Fibrous Homogeneous Ashed, Crushed
22 - A *71976766PLM_22*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum *tile*	**None Detected**		**100% Other**	Blue Non Fibrous Homogeneous Crushed
22 - B *71976766PLM_31*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum *mastic*	**None Detected**	**20% Cellulose**	**80% Other**	Brown Non Fibrous Homogeneous Crushed
22 - C *71976766PLM_32*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum *linoleum*	**None Detected**	**5% Cellulose**	**95% Other**	Tan Non Fibrous Homogeneous Ashed, Crushed
23 - A *71976766PLM_23*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	**None Detected**		**100% Other**	Blue Non Fibrous Homogeneous Crushed
23 - B *71976766PLM_33*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	**None Detected**	**20% Cellulose**	**80% Other**	Brown Non Fibrous Homogeneous Crushed
23 - C *71976766PLM_34*	12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	**None Detected**	**5% Cellulose**	**95% Other**	Tan Non Fibrous Homogeneous Ashed, Crushed

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Heather Davide (34)

Analyst

Approved Signatory

Bulk Asbestos Analysis

By Polarized Light Microscopy
EPA Method: 600/R-93/116 and 40 CFR, Part 763, Subpart E, App.E

NVLAP TESTING
NVLAP LAB CODE 200664-0

Lab ID # 173190

Customer: ECS Mid-Atlantic, LLC
14026 Thunderbolt Place
Suite 100
Chantilly, VA 20151

Attn: Michael Hamill

Project: 11652-E2/ AHERA Rowing Facility

Lab Order ID: 71976766
Analysis ID: 71976766_PLM
Date Received: 10/13/2021
Date Reported: 10/18/2021

Sample ID *Lab Sample ID*	Description *Lab Notes*	Asbestos	Fibrous Components	Non-Fibrous Components	Attributes Treatment
24	Interior White Stair Stringer Caulk	None Detected		100% Other	White, Cream Non Fibrous Homogeneous
71976766PLM_24					Ashed, Crushed
25	Interior White Stair Stringer Caulk	None Detected		100% Other	White, Cream Non Fibrous Homogeneous
71976766PLM_25					Ashed, Crushed

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Heather Davide (34)

Analyst

Approved Signatory

7197667666

Client:	ECS Mid-Atlantic, LLC	***Instructions:***
Contact:	Michael Hamill	*Use Column "B" for your contact info*
Address:	14026 Thunderbolt Place, Suite	
Phone:	(703)-471-8400	*To See an Example Click the bottom Example Tab.*
Fax:		
Email:	mhamil@ecslimited.com	***Enter samples between "<<" and ">>" Begin Samples with a "<< "above the first sample and end with a ">>" below the last sample.***
Project:	11652-E2/ AHERA Rowing Facility	
Client Notes:		*Only Enter your data on the first sheet "Sheet1"*
P.O. #.	11652-E2/ AHERA Rowing Facility	*Note: Data 1 and Data 2 are optional fields that do not show up on the official report, however they will be included in the electronic data returned to you to facilitate your reintegration of the report data.*
Date Submitted:	10/12/2021 0:00	
Analysis:	PLM EPA 600/R-93/116	
TurnAroundTime:	3-Day	

Scientific Analytical Institute

4604 Dundas Drive
Greensboro, NC 27407
Phone: 336.292.3888
Fax: 336.292.3313
Email: lab@sailab.com

Sample Number	Data 1	Sample Description	Data 2
<<			
1		Interior White Window Caulk	2nd Floor Gym Area
2		Interior White Window Caulk	2nd Floor Gym Area
3		Drywall Ceiling	2nd Floor Gym Area
4		Drywall Ceiling	1st Floor Stairwell
5		Drywall Ceiling Joint Compound	2nd Floor Gym Area
6		Drywall Ceiling Joint Compound	1st Floor Stairwell
7		Clear Floor Mat Mastic, Gray Leveling Compound, and Brown Mastic	2nd Floor Gym Area
8		Clear Floor Mat Mastic, Gray Leveling Compound, and Brown Mastic	2nd Floor Gym Area
9		Interior White Door Caulk	2nd Floor Gym Area
10		Interior White Door Caulk	1st Floor Stairwell
11		Interior White Expansion Joint Caulk	2nd Floor Gym Area
12		Interior White Expansion Joint Caulk	1st Floor Warehouse
13		4" Black Cove Base with Cream Mastic	2nd Floor Gym Area
14		4" Black Cove Base with Cream Mastic	2nd Floor Gym Area
15		12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Linoleum	2nd Floor Men's Locker Room
16		12" x 12" White with Blue Flecked Floor Tile with Brown/Yellow Mastic and Linoleum	2nd Floor Men's Locker Room
17		CMU Block Filler	2nd Floor Gym Area
18		CMU Block Filler	1st Floor Electric Room
19		CMU Block Filler	1st Floor Sprinkler Room
20		White Carpet Mastic	2nd Floor Hallway
21		White Carpet Mastic	2nd Floor Hallway
22		12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	2nd Floor Men's Locker Room
23		12" x 12" Blue with White Flecked Floor Tile with Yellow Mastic and Linoleum	2nd Floor Men's Locker Room
24		Interior White Stair Stringer Caulk	Stairwell
25		Interior White Stair Stringer Caulk	Stairwell
>>			

B Shelley 10/13
10:30A

Accepted ☒
Rejected ☐

Relinquished By

Received By

Appendix V: Certifications/ Licenses

License Details

Name	HAMILL, MICHAEL PETER
License Number	3303003941
License Description	Asbestos Inspector License
Rank	Asbestos Inspector
Address	NATIONAL HARBOR, MD 20745
Initial Certification Date	2014-04-16
Expiration Date	2022-04-30

The license information in this application was last updated at Tue Apr 26 02:50:17 EDT.

COMMONWEALTH of VIRGINIA

Department of Professional and Occupational Regulation
9960 Mayland Drive, Suite 400, Richmond, VA 23233
Telephone: (804) 367-8500

EXPIRES ON
12-31-2022

NUMBER
3303004832

BOARD FOR ASBESTOS, LEAD, AND HOME INSPECTORS
ASBESTOS INSPECTOR LICENSE

ZACHARY DAVID HARRELL
1927 N CAMERON ST
ARLINGTON, VA 22207

DPOR

Mary Broz-Vaughan, Director

Status can be verified at http://www.dpor.virginia.gov

(SEE REVERSE SIDE FOR PRIVILEGES AND INSTRUCTIONS)

DPOR-LIC (02/2017)

(DETACH HERE)

DPOR COMMONWEALTH of VIRGINIA
Department of Professional and Occupational Regulation

BOARD FOR ASBESTOS, LEAD, AND HOME INSPECTORS
ASBESTOS INSPECTOR LICENSE
NUMBER: 3303004832 EXPIRES: 12-31-2022

ZACHARY DAVID HARRELL
1927 N CAMERON ST
ARLINGTON, VA 22207

(FOLD)

Status can be verified at http://www.dpor.virginia.gov

DPOR-PC (02/2017)

Appendix VI: AHERA ACBM and Suspect ACBM Categories Document

AHERA ACBM and Suspect ACBM Categories

(1) Damaged or significantly damaged thermal system insulation ACM:

- (1) Means thermal system insulation ACM on pipes, boilers, tanks, ducts, and other thermal system insulation equipment where the insulation has lost its structural integrity, or its covering, in whole or in part, is crushed, water stained, gouged, punctured, missing, or not intact such that it is not able to contain fibers. Damage may be further illustrated by occasional punctures, gouges or other signs of physical injury to ACM; occasional water damage on the protective coverings/jackets; or exposed ACM ends or joints. Asbestos debris originating from the ACBM in question may also indicate damage.

(2) Damaged friable surfacing ACM:

- (2) Means friable surfacing ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or which has delaminated such that its bond to the substrate (adhesion) is inadequate, or which, for any other reason, lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

(3) Significantly damaged friable surfacing ACM:

- (3) Means damaged friable surfacing ACM in a functional space where the damage is extensive and severe.

(4) Damaged or significantly damaged friable miscellaneous ACM:

- (4) Means friable miscellaneous ACM which has deteriorated or sustained physical injury such that the internal structure (cohesion) of the material is inadequate or, if applicable, which has delaminated such that its bond to the substrate (adhesion) is inadequate or which for any other reason lacks fiber cohesion or adhesion qualities. Such damage or deterioration may be illustrated by the separation of ACM into layers; separation of ACM from the substrate; flaking, blistering, or crumbling of the ACM surface; water damage; significant or repeated water stains, scrapes, gouges, mars or other signs of physical injury on the ACM. Asbestos debris originating from the ACBM in question may also indicate damage.

(5) ACBM with potential for damage:

- (5) Means circumstances in which:

    - (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities.

- (2) There are indications that there is a reasonable likelihood that the material or its covering will become damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

(6) ACBM with potential for significant damage:

- (6) Means circumstances in which:

  - (1) Friable ACBM is in an area regularly used by building occupants, including maintenance personnel, in the course of their normal activities.

  - (2) There are indications that there is a reasonable likelihood that the material or its covering will become significantly damaged, deteriorated, or delaminated due to factors such as changes in building use, changes in operations and maintenance practices, changes in occupancy, or recurrent damage.

  - (3) The material is subject to major or continuing disturbance, due to factors including, but not limited to, accessibility or, under certain circumstances, vibration or air erosion.

(7) Any remaining friable ACBM or friable suspected ACBM:

- (1) Means any remaining friable ACBM or friable Suspected ACBM in a building.