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ASBESTOS HAZARD EMERGENCY RESPONSE ACT (AHERA) THREE-YEAR REINSPECTION REPORT – SPRING 2025

Conducted at:

DISTRICT EDUCATION CENTER
351 SOUTH HUDSON AVENUE
PASADENA, CALIFORNIA 91109

Prepared for:

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M&O AND TRANSPORTATION
PASADENA UNIFIED SCHOOL DISTRICT
351 SOUTH HUDSON AVENUE
PASADENA, CALIFORNIA 91109

September 2025

Report generated/reviewed by:

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I. EXECUTIVE SUMMARY

I. EXECUTIVE SUMMARY

On September 2, 2025, Environmental Assistance Group (EAG) Building Inspector, Eldwin Kennedy Certified Asbestos Consultant (CAC), performed a three-year reinspection for asbestos-containing building materials (ACBMs) at the District Education Center, located at 351 S. Hudson Avenue, Pasadena, California. The purpose of the reinspection was to comply with the U.S. Environmental Protection Agency (EPA) 40 CFR 763 Asbestos Hazard Emergency Response Act (AHERA) Three-Year Reinspection and Six-Month Surveillance requirements.

Prior to the reinspection, previous inspection reports were reviewed in order to determine which building materials had been previously tested and found to contain asbestos, which materials were determined not to be asbestos-containing, and whether any materials had not been tested for asbestos. After the review of the previous building inspections, a complete visual walk-through inspection of the site was performed. The inspection revealed that conditions at the District Education Center have changed since the last inspection in June 2022.

Some ACBMs that remain at the District Education Center listed as “suspect” or “assumed” may require sampling prior to disturbance to confirm asbestos content and potentially rule out the need for abatement. The enclosed table of materials contains specific information regarding buildings, materials, locations, quantities, condition and recommended response actions.

- Non-friable Miscellaneous material 9”x9” Vinyl Floor Tile and associated mastic is found in various rooms in Building B, C and D
- Non-friable Miscellaneous material 12”x12” Vinyl Floor Tile and associated mastic is found in various rooms in Building D
- Friable Thermal System Insulation asbestos containing Pipe Insulation is found in some rooms, attics crawl spaces and suspect in the walls in Buildings B, C and D
- Friable Surfacing Trowelled Wall and Ceiling Plaster is found in Buildings B, C and D
- Non-Friable Miscellaneous Transite (Asbestos Cement) Pipe is found in Building D
- Non-Friable Miscellaneous Transite (asbestos cement) (Asbestos Cement Board) are found associated with Buildings B, C and D
- Friable Miscellaneous Flexible Duct Joint Cloth is found in Building D
- Friable backed Miscellaneous Vinyl Sheet Flooring is located in Building C and D
- Friable Surfacing Stucco is found on the exterior of Building B
- Friable Metal Clad Pipe Insulation on risers in Building C

Except as noted in the enclosed Table, remaining asbestos-containing materials located throughout the school were intact and in good condition at the time of the reinspection. To ensure their integrity and continued good condition, it is recommended that the materials be placed on the school’s Operations and Maintenance (O&M) Program. Surveillance at six-month intervals is also recommended for all materials. Material descriptions and locations can be found in Section II (Survey Results Report), along with additional information for each material.

If you have any questions, or if EAG can be of further assistance, please contact our office at 949-237-1036.

II. SURVEY RESULTS REPORT

SURVEY RESULTS REPORT GENERAL INFORMATION

Information in **RED** = Notes/Changes from the previous asbestos reinspection report

ACM = Asbestos Containing Materials

ACBM = Asbestos Containing Building Materials

Assumed = The material looks like it is ACM but sample analyses determining asbestos content was not available.

NC = No Change since the last inspection

ND = No asbestos Detected

Suspect = ACM (like pipe insulation) could not be visually confirmed present. For example, the inspector believes it is likely to be inside of walls or ceiling spaces.

Type

Misc = Miscellaneous building materials manufactured elsewhere and installed in or on the building

Surfacing = Material sprayed or troweled onto interior or exterior building surfaces

TSI = Thermal System Insulation applied on pipes and ducts heating and/or cooling buildings

Friable

Yes/No= Building materials that can be crumbled to powder by hand pressure when dry

Assessment

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

(2) Damaged friable surfacing ACM.

(3) Significantly damaged friable surfacing ACM.

(4) Damaged or significantly damaged friable miscellaneous ACM.

(5) ACBM with potential for damage.

(6) ACBM with potential for significant damage.

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

Response Action = Recommendations for all ACM that was found during this inspection. The Response Actions indicate one of the following options.

Response Action/ Priority Levels	Response
1	Removal
2	Repair
3	Enclosure
4	Encapsulation
5	Operations and Maintenance (O&M) Program
6	Periodic Surveillance
7	Removed –No Action Necessary

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<i>Building</i>	<i>Location</i>	<i>Material</i>	<i>Approx. Quantity</i>	<i>Type</i>	<i>Friable</i>	<i>Assessment</i>	<i>Response Action</i>	<i>Notes</i>
B & C	116-135 Crawlspace	Pipe insulation	285 LF	TSI	Yes	7	5/6	Viewed from S.W. patio access. NC Not viewed
B & C	122-130 Crawlspace	Pipe insulation	190 LF	TSI	Yes	7	5/6	Restrict access. Hatch in boiler room, east wall. Repair work evident. Not accessed NC
B	Boiler Storage Room	Pipe insulation	50 LF	TSI	Yes	7	5/6	Repair work evident (access from first floor inside) NC
B	Tunnel to A Bldg.	Pipe insulation	6 LF	TSI	Yes	7	5/6	Repair work evident NC
B 1 st & 2 nd Floors	118-236 Interior	Wall/ceiling plaster	28,270 SF	Surface	Yes	7	5/6	Minor water damage 233 ceiling, damage hall ceilings
B 1 st & 2 nd Floors	133-230 Exterior	Stucco	3,250 SF	Surface	Yes	7	5/6	Minor damage
B 1 st floor	122-138 Hallway	Transite (asbestos cement) board	300 SF	Misc	No	5	5/6	NC
B 1 st floor	130 Health Clinic	9x9 grayish floor tile/mastic	440 SF	Misc	No	5	5/6	Possible under gray linoleum NC
B 2 nd floor	227/236 Hallway	Transite (asbestos cement) board	240 SF	Misc	No	5	5/6	At end of hall NC At 233 and transom window fill
B 2 nd Floor	233	9x9 brownish floor tile/mastic	160 SF	Misc	No	5	5/6	NC
C	C to D Tunnel S.W. corner of crawlspace	Pipe insulation	30 LF	TSI	Yes	7	5/6	Repaired Not viewed
C	116-122 Crawlspace	Pipe insulation	875 LF	TSI	Yes	1	5/6	Restrict entry, minor damage. Viewed from access at S. exterior patio. Repair work evident. NC Not viewed

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C 1 st floor	112-230 Interior	Wall/ceiling plaster	55,200 SF	Surface	Yes	7	5/6	NC Sample
C 1 st floor	119 115	9x9 gray floor tile/mastic	120 SF	Misc	No	5	5/6	Possible under carpeting NC
C	119 and 123	Pipe insulation on risers	2 at 6'	TSI	Yes	7	5/6	NC Metal clad in 123, exposed end inside cabinet chase 119
C 1 st floor	121	Brown linoleum/sheet vinyl	1,280 SF	Misc	Yes	5	5/6	Possible under carpet NC
C	121 Along west wall	Metal clad pipe insulation on risers	2 at 6'	TSI	Yes	1	1/2	Exposed at top Jacket damaged NC
C 1 st floor	123 Mechanical Room	Brown linoleum/sheet vinyl	210 SF	Misc	Yes	4	5/6	Minor damage NC
C 2 nd floor	214-230 Attic	Pipe insulation debris	5 SF	TSI	Yes	7	5/2	Restrict entry. Access in 230 Custodian Rm. Not accessed
C 2 nd floor	221-223	9x9 beige floor tile/mastic	1,656 SF	Misc	No	5	5/6	Under carpet NC
C 2 nd floor	222 Storage Room	9x9 green floor tile/mastic	45. SF	Misc	No	5	5/6	NC
D	001	Transite (asbestos cement) board	24 SF	Misc	No	5	5/6	East wall NC
D	002-006 Plenum	Pipe insulation	90 LF	TSI	Yes	1	5/6	Damage, debris above spline ceiling tile NC Not accessed
D	002-009 Hallway	9x9 red brick pattern floor tile/mastic	456 SF	Misc	No	5	5/6	Missing & damaged. NC

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D	003-021 above ceilings	Pipe insulation	260 LF 10"	TSI	Yes	7	5/6	Restrict access View in rear of Custodian Rm. NC
D	004, 008, 009, 010, 011	9x9 brown floor tile/mastic	3,600 SF	Misc	No	5	5/6	Suspect Under carpet in 008 and 011 and 009 and 004 NC
D	005 Kitchen	Yellow linoleum/sheet vinyl	945 SF	Misc	Yes	5	5/6	Damage NC
D	005 Kitchen Closet	9x9 multi-colored floor tile/mastic	25 SF	Misc	No	4	5/6	Minor damage S.W. corner NC
D	006	9x9 multi-colored floor tile/mastic	250 SF	Misc	No	4	1	45% missing NC
D	007 Plenum	Flexible duct joint cloth	2 EA	Misc	Yes	7	5/6	OK NC
D	007 Plenum	Pipe insulation		TSI	Yes	1	2	Damage & debris NC
D	012, 014, 015, 019	12x12 brown floor tile/mastic	750 SF	Misc	No	5	5/6	Under carpet 212 and 215 NC
D	016 Master Control	9x9 beige floor tile/mastic	350 SF	Misc	No	4	2	Remove New 12x12 grey tile
D	014 017 Cust. Rm.	9x9 brown floor tile/mastic		Misc	No	5	5/6	NC
D	020 Electrical Rm.	Pipe insulation	8 LF	TSI	Yes	1	5/6	Minor damage along north wall NC
D	021, 023, 010 Studio Prop Rm.	9x9 brown floor tile/mastic	2,70 SF	Misc	No	4	2	Damaged, missing tiles in Studio Prop Rm. Under carpet in 023 NC
D	021, 022, 023 West ceiling space	Pipe insulation	32 LF	TSI	Yes	1	5/6	Exposed in Rm. 021 NC

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D	Mechanical Rm.	Flexible duct joint cloth	3 EA	Misc	Yes	7	5/6	Located next to elevators NC
D 1 st floor	Hallway, Men's RR entry	9x9 beige multi color floor tile/mastic	1,552 SF	Misc	No	5	5/6	Includes south end NC
D 1 st floor	102-114 Even	9x9 brown floor tile/mastic	3,410 SF	Misc	No	5	5/6	Under carpet & 12x12 tile. 102-114 under carpet. Suspect NC
D 1 st floor	103 Men's RR and above Custodian Rm.	Pipe insulation	75 LF	TSI	Yes	1	5/6	In plenum & pipe chase. (Go to end of plumbing access and climb up) Damage NC
D 1 st floor	103 Men's RR Entry	9x9 tan multi-color floor tile/mastic	24 SF	Misc	No	5	5/6	NC
D 1 st floor	105 Kitchen Plenum	Pipe insulation	23 LF	TSI	Yes	1	2	Restrict access – damage & debris. Above drop ceiling Repair/clean Not accessed NC
D 1 st floor	105 Kitchen	9x9 plus 12x12 tan floor tile/mastic	48 SF	Misc	No	5	5/6	9x9 gray tile underneath NC
D 1 st floor	105, 107, 108, 113, 109	9x9 gray floor tile/mastic	3,000 SF	Misc	No	5	5/7	Under carpet. Reported by site staff removed in 109, 111 NC
D 1 st floor	111 Storage Vault	9x9 gray floor tile/mastic	48 SF	Misc	No	5	5/6	NC
D 1 st floor	111B Plenum	Pipe insulation	12 LF	TSI	Yes	7	5/6	NC
D 1 st floor	Hallway Plenum	Pipe insulation	26 LF	TSI	Yes	7	5/6	Above concealed spline ceiling near elevator NC
D 2 nd floor	201 Custodian Rm.	Pipe insulation	7 LF	TSI	Yes	1	2	Damage Repair NC

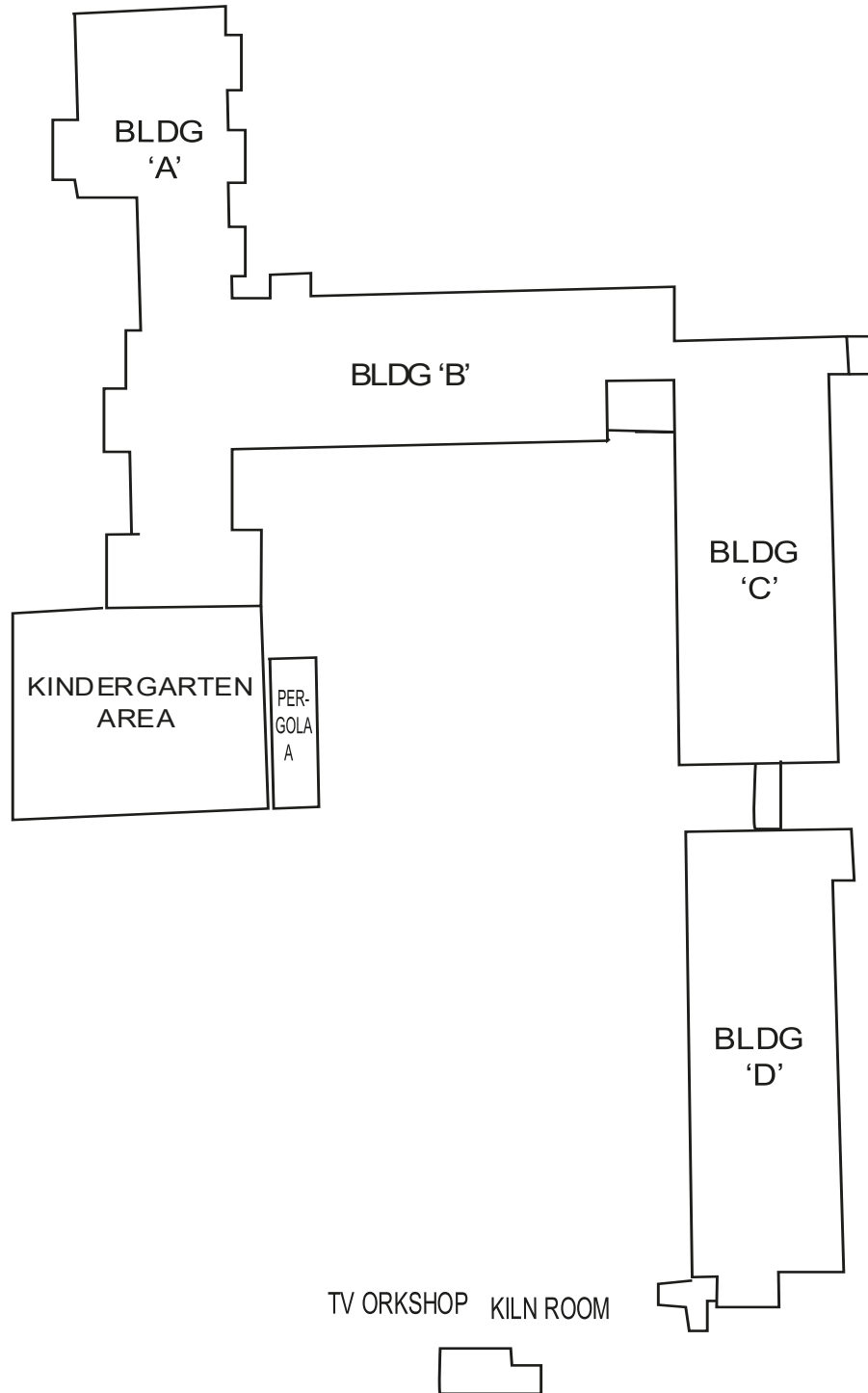
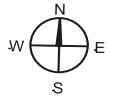
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D 2 nd floor	201 Custodian Rm.	Transite (asbestos cement) pipe	1 EA	Misc	No	5	5/6	Transite (asbestos cement) flue NC
D 2 nd floor	202 Plenum	Pipe insulation	18 LF	TSI	Yes	7	5/6	Above concealed spline ceiling NC Not accessed
D 2 nd floor	204, 206, 208	9x9 brown floor tile/mastic	3,500 SF	Misc	No	5	5/6/2	Rest NC
D 2 nd floor	203 Area Hall Above ceiling	Pipe insulation	8 LF	TSI	Yes	7	5/6	NC Not accessed
D 2 nd floor	203 Cust. Rm. attic & west rooms ceiling space	Pipe insulation	14 LF	TSI	Yes	7	5/6/7	Good. NC
D 2 nd floor	205 Plenum	Flexible duct joint cloth	2 ES	Misc	Yes	7	5/6	Suspect above drop ceiling NC
D 2 nd floor	205-207, 209, 211	9x9 gray multi floor tile/mastic	1,950 SF	Misc	No	5	5/6	Under carpet in Rm. 205, 207 NC
D 2 nd floor	206/208 Copy Room	9x9 brown floor tile/mastic	380 SF	Misc	No	5	5/6	NC
D 2 nd floor	209, 210, 211, 212	9x9 brown floor tile/mastic	3,500 SF	Misc	No	5	5/6	Under carpet in 210-212. NC
D 2 nd floor	209 Workroom Plenum	Pipe insulation	14 LF	TSI	Yes	7	5/6	Not viewed NC
D 2 nd floor	209 B Office, Storage	9x9 gray multi floor tile/mastic	1,350 SF	Misc	No	5	5/6	NC
D 2 nd floor	211 Storage Room	Pipe insulation	12 LF	TSI	Yes	1	1	Repaired
D 2 nd floor	211, 213 Storage	9x9 brown floor tile/mastic	180 SF	Misc	No	4	5/6	Minor damage

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D 2 nd floor	212 Area Hall above ceiling	Pipe insulation	8 LF	TSI	Yes	7	5/6	Suspect NC
D 2 nd floor	212 Kitchen Plenum	Pipe insulation	6 LF	TSI	Yes	1	5/6	Damage. Spline ceiling TSI not observed
D 2 nd floor	213 Plenum	Pipe insulation	12 LF	TSI	Yes	7	5/6	Above ceiling grid. NC
D 2 nd floor	Hallway	9x9 brown floor tile/mastic	1,553 SF	Misc	No	5	5/6	Includes electrical closet, north end NC
D 3 rd floor	301 Kitchen, Lounge	9x9 beige multi floor tile/mastic	1,200 SF	Misc	No	5	5/6	New carpet - suspect underneath NC
D 3 rd floor	301 Mechanical Room	Flexible duct joint cloth	2 ES	Misc	Yes	7	5/6	Encapsulated NC
D 3 rd floor	301 Mechanical Room	Pipe insulation	20 LF	TSI	Yes	7	5/6	1.5 LF at rear of heater near ceiling – not found 20 LF in pit. chase NC
D 3 rd floor	301 Storage	9x9 brown floor tile/mastic	50 SF	Misc	No	5	5/6	New carpet over tile NC
D	Interior	Wall/ceiling plaster	43,000 SF	Surface	Yes	7	5/6	NC Sample

III. DIAGRAM



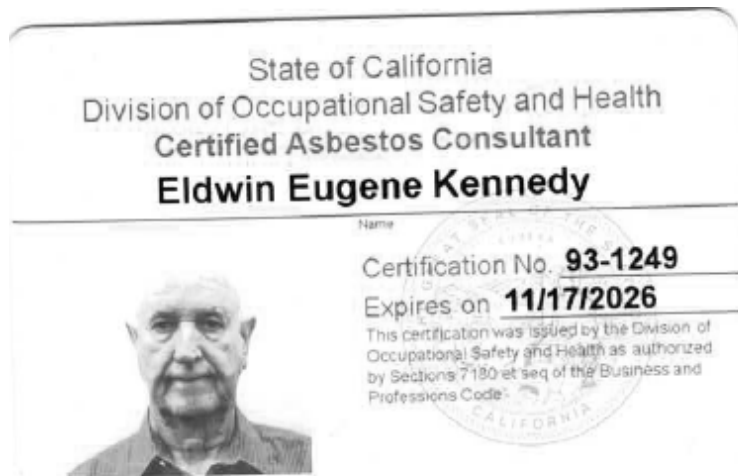
CAMPUS SITE

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IV. INSPECTOR'S CERTIFICATIONS

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V. DISCLAIMER/REPORT LIMITATIONS

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All reports and recommendations are based on conditions and practices observed and information made available to Environmental Assistance Group (EAG) by the client and the designated sites/facilities on the days the inspection was completed. This report does not purport to set forth all hazards, or to indicate that other hazards do not exist. No responsibility is assumed by EAG for the control or correction of conditions or practices existing at the facilities, or at any other premises surveyed by EAG, for and on the behalf of the client. Services provided by EAG shall be governed by the standard of practice for professional services measured at the time those services are rendered.

All information contained in this report is proprietary and limited to the scope of services, parameters of the analytical methods used and the conditions present at the time of this inspection. Any references to quantities are considered estimates and are not to be construed as actual.

The provided survey was not destructive. Prior to any demolition or renovation a comprehensive (possibly destructive) "Renovation Survey" is highly recommended.