ASBESTOS ABATEMENT PROJECT DESIGN AND WORK PLAN

Miller Junior High School
Aberdeen, Washington 98520

Water-Damage Wall Abatement

Owner / LEA	Aberdeen School District (ASD)
General Contractor	ServiceMaster 1st Choice
Project Designer	EnviroTech Consulting Services, LLC
Prepared By	Gary A. Randall, AHERA Accredited Asbestos Project Designer Accreditation No. PDR-20251106-01 | Exp. 11/06/2026
Revision / Date	Rev. A / September 15, 2026

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IMPORTANT DESIGN BASIS: The available bulk-sample report is Washington Asbestos Testing LLC Batch WATT2606238, issued September 1, 2026. Samples 1 through 3, identified as Nurse Room Wall, each reported the tan compact powdery wall texture with paint at 2% chrysotile and the tan compact powdery joint compound with paper at 2% chrysotile; the underlying white chalky material with paper was reported as none detected. These are the only wall analytical results provided to ETCS. For purposes of this Project Design, visually and physically matching wall texture and joint compound at the green-line work faces shown in Appendix A are treated as asbestos-containing material and shall be abated under this design. Any materially different or previously concealed suspect material shall not be disturbed until evaluated.

1. Project Identification and Design Summary

Project Location	Miller Junior High School, 100 East Lindstrom, Aberdeen, Washington 98520
Owner / Local Education Agency	Aberdeen School District (ASD)
General Contractor	ServiceMaster 1st Choice
Asbestos Abatement Contractor	RSG Abatement & Demolition Corp 2701 S J St, Tacoma, WA 98409 | (253) 327-1904 WA Abatement License/Certification: ABCN00001669 | Exp. 06/20/2027
Project Designer	EnviroTech Consulting Services, LLC (ETCS) Gary A. Randall, AHERA Accredited Asbestos Project Designer
Project Designer Accreditation	PDR-20251106-01 | Expires November 6, 2026
Known ACM	Wall texture and wallboard joint compound: 2% chrysotile asbestos in Samples 1-3 (Nurse Room Wall), Washington Asbestos Testing LLC Batch WATT2606238, issued 09/01/2026
Ceiling Height	7 ft 8 in
Flooring	Vinyl composition tile (VCT) and glue-down carpet; both remain in place
Ceiling	Suspended acoustic ceiling panels in lay-in grid; remains in place
School Occupancy	School will be closed and unoccupied during abatement and through final clearance
Primary Abatement Method	Negative-pressure enclosure (NPE) with wet removal, HEPA filtration, controlled decontamination, and final AHERA TEM clearance
Clearance	Independent final visual inspection and aggressive TEM air clearance under direct authorization from the LEA
Analytical Report	Washington Asbestos Testing LLC, Batch WATT2606238, issued September 1, 2026
Certified Asbestos Supervisor	Name: Alfredo Acevedo Certificate No.: NES-ASR-202060312-11 Expiration Date: March 12, 2027

The latest project drawing, Appendix A, governs the locations of flood cuts, critical barriers, demarcation points, decontamination unit, HEPA-filtered negative-air discharge points, and PCM area-monitoring points. The drawing identifies the school area as Miller Junior High School and shows the relevant rooms, hallways, adjacent clean areas, and the decontamination arrangement.

2. Purpose and Regulatory Classification

The purpose of this Project Design is to define the minimum asbestos abatement controls, work practices, monitoring, clearance procedures, and responsibilities for removal of water-damaged wall materials and associated asbestos-containing surfacing material within the affected school area. This document is intended to be used with the asbestos survey/laboratory documentation and Appendix A drawing.

Because the wall texture is a surfacing ACM and will be stripped from the remaining gypsum wallboard, that portion of the work is Class I asbestos work under Washington law. Removal of asbestos-containing wallboard/joint compound is Class II when considered separately; however, all work within the common regulated area shall be performed using the Class I controls established by this design.

This is an AHERA school response action. The connected negative-pressure work area shown in Appendix A is designated by the Project Designer as one functional space/testing site for final clearance, provided the contractor does not create separately isolated containment phases. If the project is divided into separate isolated work areas or phases, each separate testing site shall be evaluated for its own clearance sampling requirements.

2.1 Laboratory Analytical Basis

ServiceMaster 1st Choice provided ETCS with Washington Asbestos Testing LLC bulk asbestos report Batch WATT2606238, issued September 1, 2026. The chain of custody identifies four samples collected on August 31, 2026.

Samples 1, 2, and 3 were collected from the Nurse Room Wall. For each of these three samples, the laboratory reported: (1) tan compact powdery texture with paint - 2% chrysotile; (2) tan compact powdery joint compound with paper - 2% chrysotile; and (3) white chalky material with paper - none detected.

Sample 4 was collected from the Boys Bathroom Ceiling. The laboratory reported no asbestos detected in each reported layer/material of that sample. The suspended ceiling system is not included in the abatement scope and will remain in place under protective polyethylene.

Because the available analytical report documents wall samples only from the Nurse Room, this Project Design treats all visually and physically matching texture and joint compound at the green-line work faces in Appendix A as ACM for the response action. Any wall finish or concealed material that differs materially from the sampled system shall be treated as suspect and shall not be disturbed until evaluated by ETCS/LEA.

3. Applicable Regulations and Standards

Authority	Requirement
Federal - AHERA	40 CFR Part 763, Subpart E, including §§ 763.83, 763.84, 763.90, 763.93, 763.94 and Appendix A.
Washington L&I	WAC 296-62-07701 through 296-62-07753, including exposure assessment/monitoring, regulated areas, Class I controls, respiratory protection, hygiene, hazard communication, and competent-person duties.
WA Asbestos Certification	Chapter 296-65 WAC, including contractor/worker/supervisor certification and project notification requirements.
ORCAA	Olympic Region Clean Air Agency Regulation 6.3 - Asbestos, including notification, controlled-area, wet-method, HEPA exhaust, and waste requirements.
Federal NESHAP	40 CFR Part 61, Subpart M, where project quantities and material condition make the work subject to NESHAP.

Where requirements differ, the contractor shall comply with the most protective applicable requirement. Nothing in this Project Design relieves the asbestos contractor of responsibility for compliance with worker-safety, environmental, licensing, notification, transportation, or disposal requirements.

4. Detailed Scope of Abatement

1. Establish the regulated area and negative-pressure enclosure in the locations shown on Appendix A. Restrict access to authorized asbestos personnel and designated project representatives only.
2. At each wall face identified by a green line on Appendix A, perform the flood cut on that side of the wall only. The opposite wall face shall remain intact and shall not be disturbed unless ETCS issues written authorization.

3. Remove gypsum wallboard from finished floor level to 24 inches above finished floor (AFF) at the green-line work faces. Removal shall be performed under wet conditions using methods that minimize breakage and fiber release.
4. After the 24-inch flood cut is complete, remove the asbestos-containing wall texture from the remaining gypsum wallboard for an additional 18 inches above the cut, from 24 inches to 42 inches AFF. The intent is to leave a clean, texture-free transition band for the General Contractor to blend new wall texture without disturbing the remaining ACM texture above 42 inches AFF.
5. Remove associated asbestos-containing joint compound located within the 24-inch wallboard removal zone as part of the wallboard system. Any joint compound or texture above the specified limits shall remain undisturbed.
6. Maintain the existing VCT and glue-down carpet in place. The flooring and flooring adhesives are excluded from disturbance under this design.
7. Maintain the suspended acoustic ceiling panels and grid in place. They are excluded from disturbance under this design.
8. Any additional suspect material, concealed material, or ACM encountered outside the defined scope shall not be disturbed. Stop work in the affected location, secure the material, and notify ServiceMaster 1st Choice and ETCS for evaluation and written direction.

SCOPE CONTROL: Green lines on Appendix A identify the wall face to be cut. They do not indicate removal of both sides of the partition. The 24-inch wallboard flood cut plus the 18-inch texture-removal strip produces a 42-inch-high treatment zone on the identified face only.

5. Roles and Responsibilities

5.1 Local Education Agency (Aberdeen School District)

- Provide the current AHERA management plan information, asbestos survey/laboratory records, and access needed for the response action.
- Retain or directly authorize ETCS, independent of the abatement contractor, for the final AHERA visual inspection and TEM clearance sampling.
- Keep the school closed and prevent student, staff, and public access to the affected area until final clearance is achieved and the regulated area is released.
- Update the school AHERA management plan and response-action records with the required project, contractor, disposal, and clearance documentation.

5.2 General Contractor - ServiceMaster 1st Choice

- Coordinate project schedule, access, utilities, non-asbestos trades, and the asbestos abatement subcontractor.
- Ensure the asbestos abatement contractor receives the asbestos survey, this Project Design, Appendix A, and all approved revisions before work begins.
- Prevent reconstruction, drying operations that disturb remaining ACM, or other trades from entering the regulated area before written clearance/release.
- Require the asbestos abatement contractor to be responsible for the cost of additional inspection, sampling, laboratory analysis, shipping, and related retesting costs when the initial clearance is not achieved. Retesting shall use the same laboratory turnaround time selected by the LEA for the initial TEM clearance unless the LEA authorizes a change in writing.

5.3 Asbestos Abatement Contractor - RSG Abatement & Demolition Corp

RSG Abatement & Demolition Corp, 2701 S J St, Tacoma, WA 98409, (253) 327-1904. Abatement License/Certification No. ABCN00001669, expiration date June 20, 2027, as provided to ETCS. The certified asbestos supervisor's name, certificate number, and expiration date were not available at the time of this revision and shall be submitted before mobilization.

- Maintain all required Washington asbestos-contractor, supervisor, and worker certifications and designate a certified asbestos supervisor/competent person.
- Submit required L&I and ORCAA notifications and determine NESHAP applicability based on verified project quantities before mobilization.
- Construct, operate, inspect, and maintain the regulated area, critical barriers, decontamination facilities, negative-pressure enclosure, HEPA filtration, and protective floor/ceiling coverings.
- Perform employee exposure assessment and monitoring, contractor area monitoring, respiratory protection, medical surveillance, hygiene/decontamination, and daily competent-person inspections.
- Perform removal, cleaning, waste packaging, transport, disposal, and required contractor closeout documentation.

- Immediately report containment breaches, elevated air results, loss of negative pressure, unexpected ACM, or other conditions that may affect this design.

5.4 EnviroTech Consulting Services, LLC

- Provide the AHERA Project Design and written design clarifications as required.
- When separately retained by the LEA, perform the independent final visual inspection and AHERA aggressive TEM clearance sampling.
- ETCS is not the abatement contractor and does not assume the abatement contractor's statutory duties for employee exposure monitoring, respiratory protection, competent-person supervision, or means and methods.

6. Preconstruction Requirements and Submittals

Before disturbance of ACM, the abatement contractor shall provide the following to ServiceMaster 1st Choice and make copies available to ETCS/LEA upon request:

- Current Washington asbestos contractor certification and certified asbestos supervisor/worker credentials. RSG shall identify the project certified asbestos supervisor by name and provide the supervisor certificate number and expiration date before mobilization; worker certification records shall be available for review.
- Copies of required Washington L&I and ORCAA notifications and amendments, including approved emergency/short-term authorization if applicable.
- Field-verified quantity of ACM to be removed for notification and NESHAP determinations. Based on the extent shown, the project is expected to exceed ORCAA's 48-square-foot notification threshold. If subject to 40 CFR Part 61 Subpart M, ORCAA requires the NESHAP notification period.
- Project-specific initial exposure assessment/negative exposure assessment and respiratory protection program information applicable to the work.
- Negative-air equipment schedule showing unit capacity, HEPA filtration, planned locations, and calculation demonstrating a minimum of four air changes per hour for the actual enclosure volume at the 7-foot-8-inch ceiling height.
- Differential-pressure monitoring method and daily pressure-log form.
- Product information/SDS for amended-water surfactant and lockdown encapsulant; encapsulant must be compatible with subsequent wall finishing.
- Confirm the controlled bagged ACM waste load-out route through the decontamination unit, together with the temporary waste-storage location, disposal facility, and waste transporter information. No separate waste load-out area is available for this project.
- Emergency contacts, work schedule, and proposed mobilization/abatement/clearance sequence.

6.1 Preconstruction Meeting

Before containment setup, ServiceMaster 1st Choice shall coordinate a preconstruction meeting with the LEA/AHERA representative, abatement contractor competent person, and ETCS. The meeting shall review the work limits, one-sided green-line flood cuts, indoor HEPA exhaust locations, HVAC lockout/tagout, decontamination access, bagged ACM waste load-out through the decontamination unit, air-monitoring responsibilities, final clearance sequence, and emergency procedures.

7. Notifications, Posting, and Site Security

- Post required DANGER/ASBESTOS warning signs at every regulated-area entrance before setup or disturbance. Signs shall comply with WAC 296-62-07721.
- Barrier and lock or otherwise secure access routes so unauthorized persons cannot enter the regulated area, decontamination unit, waste route, or indoor HEPA-exhaust receiving zones.
- Maintain copies of Washington Asbestos Testing LLC Batch WATT2606238, this Project Design and Appendix A drawing, applicable notifications/amendments, and required contractor records at the site.
- ORCAA notification is required for asbestos projects exceeding 48 square feet or 10 linear feet of ACM. ORCAA currently requires 10 days' advance notice for a standard asbestos project and 14 days for an Asbestos-NESHAP project, unless an authorized emergency exception applies.
- The abatement contractor is responsible for L&I asbestos-project notification in accordance with WAC 296-65-020 and for all required amendments if dates, quantities, contractor information, or work hours change.

8. HVAC Isolation, Electrical Safety, and Building Systems

- The HVAC system serving the affected area shall be shut down, locked out/tagged out, and remain off throughout containment setup, abatement, cleaning, contractor clearance, AHERA TEM clearance, and until final written release.

- All supply registers, return grilles, penetrations, and other HVAC openings within the regulated area shall be sealed as critical barriers using a double layer of 6-mil polyethylene or equivalent, continuously sealed at the perimeter. This requirement is more specific than the drawing note and controls the work.
- Because HEPA-filtered negative-air exhaust will discharge to interior clean areas, HVAC returns/intakes in or capable of drawing air from those discharge zones shall remain shut down or effectively isolated until clearance and containment removal are complete.
- Electrical circuits within the NPE shall be de-energized unless protected by GFCI as required. Temporary lighting and power shall be GFCI-protected and arranged so cords do not compromise containment or decontamination routes.
- Fire alarms, sprinkler systems, and other life-safety systems shall not be disabled except under an approved impairment plan coordinated by the LEA/General Contractor.

9. Regulated Area, Critical Barriers, and Surface Protection

9.1 Critical Barriers and Containment

- Construct the regulated area to the limits shown on Appendix A. Seal doors, windows, penetrations, pipe openings, electrical openings, and other pathways capable of allowing asbestos migration. Critical barriers shall be durable, airtight, and maintained until final clearance is achieved.
- Provide transparent viewing ports where feasible, consistent with ORCAA requirements for negative-pressure enclosures.
- Interior doors within the common NPE that are not designated as critical barriers should remain open during active negative-air operation and final aggressive clearance so airflow can communicate throughout the designated testing site. Doors leading outside the NPE shall be sealed or controlled by decontamination/airlock arrangements.
- The note on Appendix A stating that a door remains open while under negative air shall not be interpreted as permission for an unprotected opening directly from the regulated area to an adjacent clean area. Any makeup-air opening shall be controlled through an inward-flapped critical barrier, airlock, or equivalent arrangement that maintains inward airflow and prevents asbestos migration.

9.2 Suspended Ceiling Protection

- Leave the suspended acoustic ceiling panels and grid in place.
- Cover the entire exposed suspended ceiling within the regulated area with polyethylene sheeting not less than 4 mil thick. Seal the sheeting continuously to the surrounding walls and around penetrations so the ceiling plenum is isolated from the work area.
- The ceiling covering is a protective isolation layer and shall not substitute for the required critical barriers at HVAC openings or other air pathways.
- If the ceiling barrier is breached or a ceiling tile/grid component is disturbed, stop work locally, repair the barrier, and notify the competent person. Suspected contamination above the ceiling shall be evaluated before work resumes.

9.3 Floor Protection

- Protect all VCT and glue-down carpet within the regulated area with a minimum 8-mil polyethylene floor covering, lapped and continuously sealed to prevent water and asbestos debris from contacting the flooring.
- Do not cut, sand, scrape, drill, staple, screw through, or otherwise disturb the existing flooring or adhesive to secure protection. Use tape, perimeter sealing, or other nonpenetrating means.
- Repair tears or punctures immediately. If a breach exposes flooring to asbestos debris, the affected area shall be HEPA-vacuumed and wet-cleaned as appropriate before final clearance.

10. Negative-Pressure Enclosure and HEPA Exhaust

- Operate the regulated area as a negative-pressure enclosure for all asbestos disturbance and cleaning activities.
- Maintain not less than four air changes per hour within the NPE and a pressure differential of at least -0.02 inches water column relative to adjacent clean areas. Maintain negative pressure continuously during the period of NPE use.
- Provide a continuous-reading differential-pressure monitor/manometer. Record pressure at startup, at least every two hours during active work, after filter changes or major entry/exit events, and at shutdown. Investigate and correct any reading that fails to maintain the required differential.
- Before asbestos disturbance and at the beginning of each work shift, inspect the enclosure for breaches and smoke-test the NPE for leakage. Repair leaks before work proceeds.
- Position HEPA filtration units to promote air movement from clean entry/makeup-air points across the work zone and away from workers toward the HEPA units.

- Maintain sufficient operating capacity, considering filter loading, to continuously meet both the four-ACH minimum and the -0.02-inch pressure requirement. Provide reserve capacity or a standby unit sufficient to restore compliant negative pressure if an operating unit fails.
- HEPA-filtered exhaust shall discharge to the interior clean areas shown on Appendix A. Those discharge areas shall remain unoccupied, secured from unnecessary access, and free of operating HVAC returns/intakes that could recirculate exhaust air. Exhaust shall be directed away from doors, personnel, and surfaces where dust could be redistributed.
- All negative-air exhaust shall pass through HEPA filtration. Ducts, collars, and discharge connections shall be sealed and inspected for leakage.

11. Worker Decontamination and Access

Provide the decontamination facility in the location shown on Appendix A. The arrangement shown includes a clean room, airlock, shower, airlock, and equipment room. The equipment room shall connect directly to the regulated area.

- All asbestos workers shall enter and exit the regulated area through the decontamination unit. No routine access through critical barriers or waste-load-out openings is permitted.
- The contractor shall implement entry/exit procedures consistent with WAC 296-62-07719, including removal of contaminated protective clothing in the equipment room and showering as required.
- Keep the clean room free of contaminated equipment and protective clothing. Maintain separate storage for street clothing and clean PPE.
- Because no practical separate waste-load-out area is available, sealed bagged ACM waste and asbestos-contaminated debris shall be loaded out through the decontamination unit shown in Appendix A. Waste shall be adequately wet and sealed in leak-tight, properly labeled containers or double 6-mil bags, as appropriate. The exterior of each package shall be HEPA-vacuumed and wet-wiped before passage through decontamination. Waste load-out shall be conducted as a controlled operation separate from routine personnel decontamination, preserving clean/dirty separation and preventing contamination of the clean room or adjacent building areas.

12. Asbestos Removal Procedures

12.1 General Work Practices

- Use HEPA-filtered vacuums and wet methods throughout removal and cleanup. ACM shall be handled in a wet/saturated condition sufficient to prevent visible emissions and fiber release.
- Do not use dry sweeping, dry shoveling, compressed air for cleanup, uncontrolled high-speed abrasive tools, or methods that unnecessarily pulverize ACM.
- Keep removed absorbent ACM and asbestos-contaminated waste adequately wet until sealed in leak-tight containers.
- Do not drop, throw, slide, or allow removed wallboard/ACM to fall in a manner that breaks material or produces dust.
- Only certified asbestos workers under the supervision of the certified asbestos supervisor/competent person may perform the abatement.

12.2 Wallboard Flood Cuts - 24 Inches AFF

- Confirm the green-line work face before cutting. Protect the opposite wall face from damage.
- Wet the wall surface and maintain wet conditions at the cut line. Use manual tools or HEPA-controlled cutting methods that minimize dust and fragmentation.
- Cut and remove gypsum wallboard from floor level to 24 inches AFF in manageable sections. Where feasible, remove sections substantially intact.
- As wallboard is removed, immediately wet any exposed friable texture/joint-compound residue. HEPA-vacuum and wet-clean studs, plates, wall-cavity surfaces, and adjacent surfaces as removal progresses.
- If water-damaged cavity insulation must be removed as part of the restoration scope, remove it within containment and package it as asbestos-contaminated waste unless ETCS/ServiceMaster 1st Choice directs otherwise based on documented conditions.

12.3 Texture Removal - 24 to 42 Inches AFF

- Following the flood cut, thoroughly wet the asbestos-containing texture on the remaining gypsum wallboard from 24 inches through 42 inches AFF.
- Remove the texture by wet scraping or another nonaggressive wet method. Sanding, dry scraping, or grinding is prohibited.
- Exercise care not to gouge or unnecessarily damage the gypsum facing or disturb the ACM texture above the 42-inch limit.

- After texture removal, HEPA-vacuum and wet-wipe the exposed substrate until free of visible residue. Apply a compatible penetrating/lockdown encapsulant as required to bind residual fibers while maintaining compatibility with subsequent drywall finishing and texture application.

12.4 Limits of Disturbance

- No wall surface outside the green-line limits shall be disturbed without written approval.
- No flooring, flooring adhesive, suspended ceiling panel/grid, or other excluded building material shall be disturbed as part of this plan.
- Any trim, base, electrical device, or other component that must be removed to accomplish the flood cut shall be evaluated against the asbestos survey before disturbance. Suspect untested materials shall be treated as ACM or sampled by an accredited inspector before disturbance.

13. Cleaning, Waste Handling, and Disposal

- Perform continuous housekeeping. HEPA-vacuum and wet-clean settled debris promptly; do not allow debris to accumulate.
- At the end of each shift, seal asbestos-containing waste in leak-tight, properly labeled containers. Double 6-mil bags or equivalent leak-tight packaging shall be used where appropriate; large rigid wallboard sections may be wrapped in leak-tight 6-mil polyethylene and sealed.
- Clean the exterior of waste containers before removal from the regulated area. All bagged ACM waste shall be loaded out through the decontamination unit. Packages shall remain sealed throughout the load-out sequence and shall be HEPA-vacuumed and wet-wiped as needed before progressing toward the clean side. No unsealed asbestos waste may enter the decontamination clean room or any clean building area.
- Transport and dispose of asbestos waste at an authorized disposal facility in accordance with ORCAA, Washington, EPA, and DOT requirements. Maintain waste shipment records/manifests for project closeout.
- Wastewater generated by wet methods or decontamination shall be managed so asbestos solids are not released to storm drainage or the environment. Disposal shall comply with the receiving sanitary sewer authority and applicable law.

14. Air Monitoring Requirements

14.1 Contractor Employee Exposure Monitoring

The abatement contractor is the employer responsible for the initial exposure assessment and employee exposure monitoring required by WAC 296-62-07709. For Class I/Class II operations, representative daily personal monitoring is required unless the contractor has a valid negative exposure assessment covering the entire operation. Personal sampling shall address the 8-hour TWA and applicable 30-minute excursion exposure.

14.2 Contractor Area PCM Monitoring

- Before asbestos work begins, obtain representative pre-abatement/background area air samples for comparison with contractor clearance monitoring.
- While the NPE is in operation, conduct representative area monitoring at least every other day at each HEPA-machine exhaust and at the entrance to the decontamination area. The "A" locations shown on Appendix A identify the intended minimum PCM monitoring points: the decontamination/clean-side location and the two interior HEPA-exhaust discharge locations.
- Additional area samples shall be collected when conditions, airflow, containment changes, elevated results, or the competent person indicate they are necessary.
- At completion of asbestos work, the contractor shall conduct WISHA clearance monitoring as required by WAC 296-62-07709(3)(h). Results must be obtained before removal or reoccupancy of the regulated area and must demonstrate airborne fiber concentrations below the PEL or at/below the pre-abatement level, whichever is lower.
- Contractor PCM monitoring is separate from and does not replace the LEA's independent AHERA TEM final clearance.

14.3 Independent AHERA TEM Final Clearance

- ETCS will perform final AHERA clearance only under separate direct authorization from the LEA and independently of the asbestos abatement contractor.
- Final TEM sampling will not begin until the contractor has completed gross removal, final cleaning, required contractor monitoring, and has notified ETCS that the work area is ready for inspection.
- ETCS will conduct the LEA-designated final visual inspection. If visible dust, debris, residue, water, or incomplete work is observed, the area fails visual inspection, and no TEM samples will be collected. The contractor shall reclean and request reinspection.

- After successful visual inspection and when the work area is dry, ETCS will perform aggressive TEM clearance sampling in accordance with 40 CFR 763.90 and Appendix A. A minimum of 13 samples will be collected for the designated testing site: five abatement-area samples, five ambient samples representative of air entering the site, two field blanks, and one sealed blank.
- Ambient TEM samples may be located in interior clean areas when those areas are representative of makeup air entering the abatement site. Ambient samples shall not be placed in the direct HEPA-exhaust plume.
- Aggressive sampling will include use of a cleaned minimum one-horsepower leaf blower to agitate floors, walls, and ceiling surfaces and stationary fans directed toward the ceiling; air filtration units remain operating during sampling. Fan quantity shall comply with Appendix A (one stationary fan per 10,000 cubic feet of worksite volume).
- TEM sample volumes and analysis shall comply with Appendix A. Where the 70 structures/mm² screening criterion is used, each of the five inside samples shall have the minimum required air volume (at least 1,199 L for a 25-mm filter or 2,799 L for a 37-mm filter), and the arithmetic mean of the five inside samples must not exceed 70 structures/mm². Otherwise, completion shall be determined by the applicable blank criteria and inside-versus-ambient Z-test under 40 CFR 763.90(i).
- If final clearance fails, the entire affected testing site shall be recleaned, reinspected, and resampled. Retesting costs shall be assigned to the abatement contractor as required by the General Contractor's contract, and the laboratory turnaround time shall be the same as the initial TEM testing unless the LEA authorizes a different turnaround time in writing.

15. Final Cleaning and Clearance Sequence

Step	Requirement
1	Complete ACM removal and remove all visible asbestos debris while maintaining wet methods and negative pressure.
2	HEPA-vacuum and wet-clean all surfaces within the work area, including floors/protective sheeting, walls, ledges, framing, equipment, decon surfaces, and other horizontal/vertical surfaces.
3	Apply compatible lockdown encapsulant to abated surfaces as required by WAC 296-62-07712 and this design. Allow surfaces to dry fully.
4	The contractor's competent person performs its final inspection and contractor-required WISHA clearance monitoring. Correct deficiencies before requesting independent clearance.
5	ETCS performs the LEA final visual inspection. Any visible dust/debris/residue results in rejection and recleaning.
6	After visual acceptance, prepare for aggressive TEM clearance. Disposable interior work layers may be removed as appropriate, but final critical barriers over doors, windows, HVAC, and air passageways and the final containment barrier shall remain in place through TEM sampling and acceptance.
7	ETCS collects AHERA aggressive TEM clearance samples and submits them to an appropriately accredited TEM laboratory.
8	Maintain containment, HVAC lockout/tagout, critical barriers, and negative air until satisfactory TEM results are received and ETCS/LEA releases the area.
9	After written clearance, dismantle containment carefully from clean to dirty, HEPA-vacuum/wet-wipe as needed, remove floor and ceiling protection without dispersing debris, and remove remaining critical barriers last.
10	Only after containment removal and final housekeeping may authorized school personnel restore the HVAC system. Reconstruction may then begin.

16. Contingency and Emergency Procedures

Condition	Required Response
Loss of Negative Pressure	Stop ACM disturbance immediately. Wet and secure exposed material, limit entry/exit, determine cause, restore compliant negative pressure, inspect/smoke-test containment, and document corrective action before resuming.

Condition	Required Response
Containment Breach	Stop work, isolate the affected clean area, notify the competent person/ServiceMaster 1st Choice/ETCS, repair the breach, HEPA-vacuum and wet-clean any affected clean-side surfaces, and perform additional air monitoring as directed before resuming.
Power Failure	Stop disturbance, maintain wet conditions, secure waste/material, and exit through decontamination if safe. Resume only after power, NPE, and required controls are restored.
Unexpected ACM / Suspect Material	Do not disturb. Wet/secure if necessary, stop work locally, notify ServiceMaster 1st Choice and ETCS, and obtain written direction following inspection/sampling or assumption as ACM.
Medical / Fire Emergency	Life safety takes precedence. Workers shall evacuate as necessary using the safest available route. Notify emergency responders of the asbestos-regulated area and complete decontamination as soon as practical after the emergency is controlled.
Elevated Air Result	Stop and evaluate the affected operation/containment. Inspect HEPA equipment and barriers, correct deficiencies, clean affected areas, and conduct follow-up monitoring before normal work resumes.

17. Changes, Deviations, and Requests for Information

The asbestos contractor shall not materially change containment boundaries, exhaust discharge locations, decontamination configuration, removal limits, or abatement method without written approval from ETCS and coordination with ServiceMaster 1st Choice/LEA. Field conditions that conflict with this design shall be submitted as a written request for information (RFI). The latest written ETCS clarification or revised drawing supersedes earlier project notes where a direct conflict exists.

18. Project Closeout Documentation

At completion, ServiceMaster 1st Choice/abatement contractor shall provide the LEA and ETCS, as applicable, a complete closeout package including:

- L&I and ORCAA notifications and all amendments;
- Contractor/supervisor/worker certification records;
- Daily competent-person logs, NPE pressure logs, and smoke-test/containment inspection records;
- Employee exposure-monitoring and contractor area/clearance PCM results;
- Waste shipment records/manifests and disposal-site documentation;
- Final visual inspection documentation and AHERA TEM laboratory report/chain of custody;
- Dates of work, contractor names/addresses, accreditation/certification information, and description/location of ACM removed;
- Written identification of any ACM remaining in or adjacent to the former regulated area.

The LEA shall retain and incorporate the required response-action and clearance records into the school's AHERA management plan in accordance with 40 CFR 763.93 and 763.94.

19. Project Designer Statement

This Project Design was prepared for the specific scope and conditions described herein and shown on Appendix A. It establishes minimum asbestos controls and does not replace the abatement contractor's obligation to comply with all applicable federal, state, and local requirements or to protect its employees. If site conditions, materials, work limits, or regulatory status differ from those described, ETCS shall be contacted before affected work proceeds. Project Designer: Gary A. Randall, AHERA Project Designer Accreditation No. PDR-20251106-01, expiration November 6, 2026.

Prepared by:	Gary A. Randall
Title:	AHERA Accredited Asbestos Project Designer
Accreditation No.:	PDR-20251106-01
Certificate Expiration:	November 6, 2026

Company: EnviroTech Consulting Services, LLC

Date: September 15, 2026

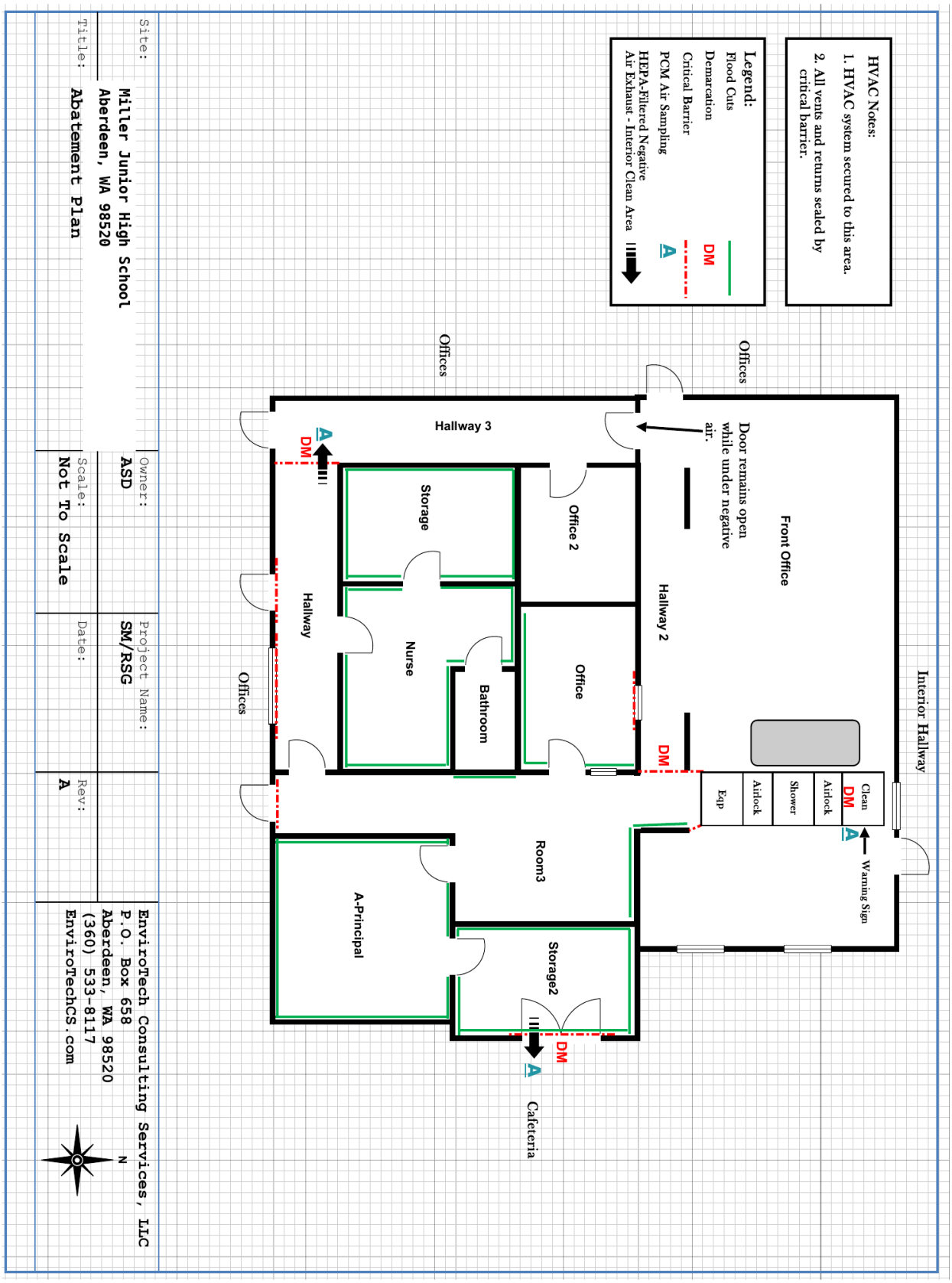
Project Designer Signature: _____

Appendix B - Regulatory References

Citation	Subject
40 CFR 763.83	AHERA definitions, including ACM, ACBM, functional space, surfacing ACM, and response action.
40 CFR 763.90	AHERA response actions, accredited design/conduct requirements, final visual inspection, and clearance.
40 CFR Part 763, Subpart E, Appendix A	Mandatory TEM sampling/analysis procedures, minimum 13 samples per testing site, independence, aggressive sampling, and clearance interpretation.
40 CFR 763.93 and 763.94	AHERA management plan updating and response-action recordkeeping.
WAC 296-62-07703	Washington definitions, including ACM, Class I, Class II, competent person, critical barrier, and NPE terms.
WAC 296-62-07709	Exposure assessment, employee monitoring, HEPA exhaust/decon area monitoring, pre-abatement monitoring, and contractor clearance monitoring.
WAC 296-62-07712	Engineering/work practice controls, Class I critical barriers/HVAC isolation, NPE minimum 4 ACH and -0.02 in. w.c., wet methods, cleanup, and encapsulant.
WAC 296-62-07719	Worker hygiene, shower, and decontamination facilities.
WAC 296-62-07721	Hazard communication and asbestos warning signs.
WAC 296-62-07728	Certified asbestos supervisor/competent person duties and inspections.
WAC 296-65-020	Washington asbestos project notification requirements.
ORCAA Regulation 6.3	Asbestos survey/notification, controlled area, HEPA exhaust, wet removal, waste handling, and disposal requirements.
40 CFR Part 61, Subpart M	Federal asbestos NESHAP requirements where applicable.

Official sources consulted for this revision: Washington State Legislature/WAC, U.S. EPA/e-CFR AHERA provisions, and Olympic Region Clean Air Agency current asbestos notification/regulation materials.

Appendix A - Project Abatement Map



Appendix C - ServiceMaster 1st Choice Bulk Asbestos Analytical Report

Washington Asbestos Testing LLC, Batch WATT2606238, issued September 1, 2026. This is the only asbestos analytical documentation supplied to ETCS for this Project Design. The following pages reproduce the original chain of custody and laboratory analytical results.

Batch# : WATT2606238

11200 Kirkland Way #340A
Kirkland, WA 98033
(425) 658-7286
WATestingLLC.com

BULK ASBESTOS TEST X **POINT COUNT (400/600/1000)** _____ **TAPE** _____ **LEAD** _____ **MOLD** _____

Client Name: ServiceMaster 1st Choice

Address: P.O. Box 676 **City:** Aberdeen **ST:** WA ZIP: 98520

Phone #: (360) 537-9800

Project Manager: Hunter Randall | NES-BIR-20241001-02 **Email:** accounting@servicemaster1stchoice.com

Project Location/Job Name: Miller Jr. High

Address: 100 East Lindstrom City: Aberdeen ST: WA Zip: 98520

SAMPLES: Turn Around Time: 1hr **Number of samples:** 4

Condition: Good _____ Damaged x Severe Damage _____

SEQ#	Sample Location	Sample Description	SEQ#	Sample Location	Sample Description
1	Nurse Room Wall	Drywall w/ Joint Compound & Texture	16		
2	Nurse Room Wall	Drywall w/ Joint Compound & Texture	17		
3	Nurse Room Wall	Drywall w/ Joint Compound & Texture	18		
4	Boys Bathroom Ceiling	Acoustic Ceiling Tile & Mastic	19		
5			20		
6			21		
7			22		
8			23		
9			24		
10			25		
11			26		
12			27		
13			28		
14			29		
15			30		

	Print Name	Signature	Company Name	Date	Time
Sampled	Hunter Randall	*Hunter Randall*	SM	08/31/2026	
Relinquished	Hunter Randall	*Hunter Randall*	SM	08/31/2026	
Delivered			USPS		
Received			WAT	9/1/26	4:51
Analyzed	Zoe M		WAT	9/1/26	8:54
Reported	Zoe M		WAT	9/1/26	8:54

How would you like to be notified? **Email** X **Phone** _____

Washington Asbestos Testing LLC guarantees the test results provided are of a precision normal with the type of methods recognized in asbestos analysis. Washington Asbestos Testing LLC accepts no legal responsibility for the purpose for which the client uses the test results. By signing on this Chain of Custody form the client agrees to relieve Washington Asbestos Testing LLC of any and all liability that may arise from the test results.

Appendix C-1. Chain of Custody - Washington Asbestos Testing LLC Batch WATT2606238

Washington Asbestos Testing LLC
15 S Oregon Ave Ste. 204, Tacoma, WA 98409
(253) 301-1852
watestingllc.com

Batch #: WATT2606238

Asbestos Analysis of Bulk Materials by App. E to Sub. E of 40 CFR Part 763 and EPA 600/R-93/116 Methods Using Polarized Light Microscopy

Attn: **Hunter Randall**
ServiceMaster 1st Choice
PO BOX 676, Aberdeen WA 98520

Project: **Miller Jr High**
100 East Lindstrom, Aberdeen, WA 98520

Date Received: 9/1/2026
Date Analyzed: 9/1/2026
Date Issued: 9/1/2026
Samples Received: 4
Samples Analyzed: 4

Analyzed By Zoe Manuel

Approved By _____ Approved Signatory (If Necessary)

SEQ#	SAMPLE ID	LAYER	DESCRIPTION	%	NON-ASBESTOS FIBERS	%	NON-FIBROUS MATERIALS	%	ASBESTOS TYPE
1	Nurse Room Wall	1	Tan compact powdery texture with paint	3%	Cellulose	95%	Carbonate/Binder, Paint	2%	Chrysotile
		2	Tan compact powdery joint compound with paper	35%	Cellulose	63%	Carbonate/Binder	2%	Chrysotile
		3	White chalky material with paper	20%	Cellulose	80%	Gypsum, Binder/Filler		None Detected
2	Nurse Room Wall	1	Tan compact powdery texture with paint	3%	Cellulose	95%	Carbonate/Binder, Paint	2%	Chrysotile
		2	Tan compact powdery joint compound with paper	35%	Cellulose	63%	Carbonate/Binder	2%	Chrysotile
		3	White chalky material with paper	20%	Cellulose	80%	Gypsum, Binder/Filler		None Detected
3	Nurse Room Wall	1	Tan compact powdery texture with paint	3%	Cellulose	95%	Carbonate/Binder, Paint	2%	Chrysotile
		2	Tan compact powdery joint compound with paper	35%	Cellulose	63%	Carbonate/Binder	2%	Chrysotile
		3	White chalky material with paper	20%	Cellulose	80%	Gypsum, Binder/Filler		None Detected
4	Boys Bathroom Ceiling	1	Beige vinyl	2%	Cellulose	98%	Vinyl/Binder		None Detected
		2	Green fibrous material	70%	Cellulose	30%	Asphalt/Binder		None Detected
		3	Brown mastic	2%	Cellulose	98%	Binder/Filler		None Detected
		4	Brown wood debris		None Detected	100%	Wood		None Detected

The results given relate only to the items tested. The results apply to the sample(s) as received.
Reports must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST, or any agency of the Federal Government.

Page 1 of 1

Appendix C-2. Laboratory Analytical Results - Washington Asbestos Testing LLC Batch WATT2606238

Appendix D - AHERA Project Designer Certificate

Gary A. Randall - AHERA Project Designer Accreditation No. PDR-20251106-01; certificate expiration: November 6, 2026.

CERTIFICATE OF COMPLETION

AHERA PROJECT DESIGNER

This is to certify that

Gary A. Randall

has attended and satisfactorily completed the refresher course requirements to be accredited as an Asbestos Abatement Project Designer in accordance with the Toxic Substance Control Act Title (Section 206) and 40 CFR 763.

Accreditation Number: **PDR-20251106-01**

Course Date November 6, 2025

Certification Expiration November 6, 2026

NOW ENVIRONMENTAL SERVICES INC.
CONSULTING & COMPLIANCE

Now Environmental Services, Inc
34004 - 9th Avenue South, Ste A5
Federal Way, WA 98003
253.927.5233

Mike Lawrence

CERTIFICATE OF COMPLETION

ASBESTOS SUPERVISOR REFRESHER COURSE

This is to certify that

Alfredo Acevedo

has attended and satisfactorily completed all requirements of 8-hour asbestos Supervisor Training course.
This training has been successfully completed in compliance with WAC 296-65-012.

Accreditation Number:**NES-ASR-20260312-11**

Course Date March 12, 2026

Certification Expiration March 12, 2027

NOW
ENVIRONMENTAL SERVICES INC.
CONSULTING & COMPLIANCE

Now Environmental Services, Inc
34004 - 9th Avenue South, Ste A5
Federal Way, WA 98003
253.927.5233

Rick Cole