

**INSPECTION REPORT FOR
Asbestos-Containing Building Materials, Lead-Based Paint,
Polychlorinated Biphenyls, and Mercury Containing
Components**

**Former Wayland Highway Department Garage
195 Main Street
Wayland, Massachusetts**

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Project 16487

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INTRODUCTION

The Town of Wayland retained Smith & Wessel Associates, Inc. (SWA) to conduct inspections for asbestos-containing building materials (ACBM), lead-based paint (LBP), polychlorinated biphenyls (PCBs) and mercury containing components at the former Highway Department building and adjacent wooden garage located at 195 Main Street in Wayland, Massachusetts. SWA inspected the spaces on November 22 and 28, 2016 in anticipation of the structures being demolished.

Asbestos

The purposes of the inspection were to evaluate the types, locations, and extent of suspect ACBM and to provide appropriate recommendations for its abatement or management. SWA's inspection addressed both friable materials (materials that can be easily crumbled, crushed, or pulverized by hand pressure) and non-friable suspect materials. SWA performed the inspection in accordance with the EPA's National Emissions Standards for Hazardous Air Pollutants (NESHAP), Title 40 CFR Part 61, for suspect asbestos-containing building materials (ACBM) as practical. SWA identified several suspect materials at the site that were sampled and analyzed for asbestos content. However, if any suspect materials are identified at later dates that are not addressed in this report, they must be assumed to be ACBM unless appropriate sampling and analysis demonstrate otherwise.

SWA identified both friable and non-friable ACBM at the site in the form of the following materials:

- Flooring/leveler
- Pipe insulation debris
- Roofing
- Chimney flashing

Lead-Based Paint

The purposes of the lead paint inspection were to evaluate the types, locations, and extent of suspect LBP in the building, to evaluate potential hazards associated with LBP, and to provide appropriate recommendations for its abatement and management.

The United States Department of Housing and Urban Development (HUD) has established a standard for lead-based paint, as tested using an X-ray Fluorescence Analyzer (XRFA), of 1.0 milligram per square centimeter (mg/cm^2). Although this standard only applies to housing funded by the federal government, it is a useful reference concentration for assessing hazards associated with lead in paint in other settings. Thus, when paint contains greater than $1.0 \text{ mg}/\text{cm}^2$, special care should be taken when conducting activities that impact these paints.

The lead content of paints surveyed at the site ranged from less than 0.1 mg/cm² to 10.9 mg/cm² as measured with an X-ray Fluorescence Analyzer (XRFA). If LBP are impacted by demolition in a manner that may generate dust or fumes, compliance with Occupational Safety and Health Administration (OSHA) regulations regarding worker exposure to lead may be necessary. Additionally, United States Environmental Protection Agency (US EPA) and Massachusetts Department of Environmental (MA DEP) regulations relative to waste disposal may apply.

PCBs

SWA's investigation for PCBs in light fixture ballasts was visual only. Typically, ballasts installed after 1978 do not contain PCBs and are marked as such. Ballasts that do not have the "No PCBs" wording on the label are assumed to contain PCBs. SWA inspected the labels on representative ballasts throughout the spaces. Ballasts representative of the large majority of light fixtures contained the "No PCBs" wording on the affixed labels and therefore are assumed to not contain PCBs in their capacitor oils. However, all individual ballasts must be inspected for the "No PCB" wording on affixed labels to determine proper disposal/recycling requirements.

SWA also collected samples of window caulking and window glazing compound for laboratory analysis to determine the concentration of PCBs. Sample collection occurred in locations that appeared to be representative of those materials throughout the buildings. A minimum five gram piece of material was taken from the substrate, placed into labeled individual sealed containers, and delivered to the laboratory via proper chain-of-custody.

The sample was labeled and the sample number and description were recorded on a field data sheet and delivered using appropriate chain-of-custody to NetLab of West Warwick, Rhode Island, for analysis. NetLab employed EPA method SW846 utilizing sample extraction method 8081 and analytical method 8028, gas chromatography, to analyze the samples (see Appendix C of this report).

Analytical results indicate that the concentration of PCBs in the materials tested is below the EPA standard of 50 ppm that determines whether the material is a hazard, thus no special handling or disposal measures are required.

Mercury Filled Fluorescent Light Fixtures

SWA observed fluorescent light bulbs that if impacted by renovations must be collected and recycled in accordance with the "Universal Waste" regulatory requirements. The fluorescent bulbs are located throughout the spaces.

SWA estimates that there are 200 (4') and 5 (8') fluorescent bulbs that would require recycling. Four heat regulating thermostats with a total of seven associated mercury tubes were observed in the space.

Exclusions

While SWA endeavored to conduct a thorough, comprehensive inspection, some

exclusions are warranted. Because our inspection addressed a limited number of areas, it is possible that the locations that we inspected were not fully representative of materials found in other areas. Our inspection included building areas only; no assessment of soil, debris, or subterranean areas was conducted. Additional limitations may have impacted our ability to inspect all locations such as poor lighting, height constraints, unusual building features, occupancy, and stored materials that block access to suspect materials. Stored goods, debris, and building materials that were removed and were either stored or loose were not inspected, but if observed were assessed and quantified.

SWA does not guarantee that all suspect roof materials were identified. Typically, roofs were applied in multiple layers and were repaired over the years. The extent of suspect roof materials will not be known until the entire roof systems are removed.

While SWA followed industry standards during the inspection, we do not warrant that all suspect hazardous building materials were identified in or on the building and shall not be held liable related to future abatement costs related to hazardous materials that are either not discovered or not appropriately characterized. This is due in part to inherent problems with every building inspection, such as, but not limited to:

- Seemingly homogeneous materials that are not in fact homogeneous;
- Seemingly representative locations that are not in fact representative;
- Layered materials that are not uniformly present or are isolated;
- Materials that are present and accessible but were not considered to be hazardous,
- Materials that are present in an isolated and limited quantity; and
- Material that is present in locations that are unsafe or otherwise difficult to access.

Client acknowledges that SWA's inspection is inherently limited and all hazardous materials may only become apparent during the course of future renovation or demolition. During the course of future renovation/demolition work, it is likely that additional hazardous materials or materials suspected of being hazardous will be identified. Such materials should be assumed to be hazardous unless appropriate evaluation or sampling and analysis demonstrate otherwise. Contracts, specifications and plans should advise contractors to conduct controlled demolition work and stop immediately should any hazardous building materials be encountered during the course of their work.

1.0 ASBESTOS CONTAINING BUILDING MATERIALS

1.1 Scope of Work

SWA's Massachusetts certified Asbestos Inspector, Eric Hanson (Cert. # AI-000220), performed the asbestos inspection of readily accessible and observable areas throughout the interior and exterior of the building. SWA inspected for the following types of suspect ACBM:

- Thermal system insulation (TSI), such as insulation on pipes, boilers, tanks and related equipment;
- Surfacing material, acoustical and decorative plasters, fireproofing and other sprayed or trowel applications; and
- Miscellaneous materials, such as window caulking, wallboard, floor tile, adhesives, and other building materials that are not TSI or surfacing materials.

To determine the asbestos content of suspect ACBM, SWA collected and analyzed representative bulk samples by extracting a small but representative portion of suspect material from the substrate. The samples, typically measuring one cubic centimeter, were collected using a variety of methods. The extracted samples were then placed into labeled, individual sealed plastic bags for transport to the laboratory.

EMSL Analytical, Inc. (EMSL) of Depew, New York, a fully accredited asbestos analytical laboratory, analyzed the bulk samples utilizing Polarized Light Microscopy (PLM) in accordance with the requirements of 40 CFR Part 763, Subpart F, Appendix A (see Appendix A of this report). Because PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials, when a negative result is obtained by PLM (less than one percent asbestos), the laboratory was instructed to analyze the sample by Transmission Electron Microscopy (TEM) to confirm the results.

For each homogeneous sampling group, the laboratory analyzed samples until a positive result was obtained (i.e. equal to or greater than one percent asbestos) or until all samples were analyzed. If one sample indicates an asbestos content equal to or greater than one percent, the entire homogenous area must be considered to be an ACBM even if one or more samples in the group indicates an asbestos content of less than one percent.

1.2 Regulatory Guidance

The EPA, OSHA, Massachusetts Department of Labor Standards (MA DLS) and MA DEP are responsible for regulating the release of asbestos into the environment and protecting workers from exposure to airborne asbestos fibers.

OSHA and MA DLS are responsible for the health and safety of workers who may be exposed in connection with their jobs including custodial activities, renovation work, and asbestos abatement. These agencies specify requirements for the work practices and engineering controls that must be utilized during asbestos abatement projects. They also require that ACM be repaired, removed, or otherwise appropriately abated before maintenance, renovation, or demolition work disturbs them. Thermal system insulation, surfacing materials, and floor tile installed before 1980 must be presumed to be ACM unless appropriate inspection and sampling analysis prove otherwise.

The EPA and MA DEP are responsible for developing and enforcing regulations necessary to protect the general public from airborne contaminants that are known to be hazardous to human health. They regulate ACM associated with renovation, demolition, and asbestos abatement projects via the NESHAP Title 40 CFR Part 61 regulation and MA DEP 310 CMR 7.15. These regulations require that buildings be inspected for ACM prior to renovation/demolition projects. They stipulate that all friable ACM as well as non-friable ACM that are in poor condition or will be made friable by renovation or demolition activity be removed or otherwise appropriately abated before they are disturbed.

1.3 Findings

SWA identified the following friable and non-friable *suspect* ACM:

• Floor tile	• Floor tile mastic adhesive
• Flooring/leveler	• Baseboard mastic adhesive
• Pipe insulation debris	• Textured ceiling material
• Gypsum board	• Joint compound
• Window caulking	• Window glazing compound
• Three tab roof shingles	• Roof tar flashing
• Rolled roofing	• Roofing felts
• Chimney flashing	• Door caulking

SWA collected a total of 48 representative bulk samples of the above materials to determine asbestos content, of which 44 were analyzed using PLM. Four of the samples did not require analysis as the first sample in the homogeneous sampling group tested positive for asbestos (i.e. contain greater than or equal to one percent asbestos). In addition, two of the samples were further analyzed using the TEM method.

SWA has listed in **Table 1**, the location and estimated quantity, by square foot (sf), linear foot (lf), or other appropriate unit, of each type of ACBM identified at the site.

Table 1 • List of Materials Testing Positive for Asbestos			
Type of Material	Location	Quantity	Sample number
Brown flooring/leveler and associated mastic on concrete	1 st floor front office underneath red carpeting	150 sf	03A
Gray pipe insulation debris	2 nd floor storage above reception area. In wall at floor level below shelves	1 lf	06A
Black rolled roofing and associated roofing felt	Main upper roof; including original building	8,500 sf	19B
Black chimney flashing	Original roof	15 sf	20A

In **Table 2**, SWA has listed all materials that tested negative for asbestos, including the locations where these materials were observed and the corresponding bulk sample reference number(s). The sample #'s marked in *italics* were further analyzed using the TEM method.

Table 2 • List of Materials Testing Negative for Asbestos		
Type of Material	Location	Sample No.
Blue 12" x 12" floor tile and associated yellow and black mastic adhesive	1 st floor reception and front middle office	01A, 01B, 02A, 02B
Black mastic adhesive associated with brown flooring/leveler	1 st floor front office	04A, 04B
Yellow baseboard mastic adhesive	1 st floor reception and front middle office	05A, 05B
Gray 9" x 9" floor tile and associated yellow mastic adhesive	1 st floor ladies room	<i>07A</i> , 07B, 08A, 08B
White textured ceiling material	1 st floor ladies room	09A, 09B
White gypsum board	1 st floor reception/office area behind paneling, ladies room, south office, original garage storage room, break room and various other locations	10A, 10B, 10C
White joint compound	Associated with gypsum board walls	11A, 11B, 11C
White interior window caulking	Main garage north side	12A, 12B
Tan interior window glazing compound	Main garage east end	<i>13A</i> , 13B

Table 2 • List of Materials Testing Negative for Asbestos		
Type of Material	Location	Sample No.
Tan 12" x 12" floor tile and associated yellow mastic adhesive	2 nd floor garage office	14A, 14B, 15A, 15B
Black three tab roof shingle	Shed roof	16A, 16B
Black tar flashing	Main roof and southwest flat roof, perimeter, penetrations and patches	17A, 17B
Black rolled roofing and associated roofing felt	Southwest flat roof	18A, 18B
Black rolled roofing	Wooden garage	21A, 21B
Gray exterior door caulking	Side entry, boiler room entry, main garage east end on blue metal doors	22A, 22B

1.4 Conclusions and Recommendations

On the basis of our findings, SWA offers the following conclusions and recommendations:

1. Both friable and non-friable ACM were identified at the site. ACM that will be impacted by renovation or demolition work must be removed, by qualified asbestos abatement personnel, before they are disturbed. SWA recommends that this work be conducted in accordance with a project design as prepared by a licensed Asbestos Abatement Project Designer. *This report is not intended for use as an abatement design.*
2. During the course of renovation or demolition work, it is possible that additional suspect ACM will be encountered. Contractors should be apprised to conduct any such work in a controlled manner. If suspect materials that have not been sampled are encountered, they should be assumed to contain asbestos, unless appropriate sampling and analysis indicates otherwise.
3. Asbestos-containing asphalt roof materials may be removed by professional Roof Contractors who are trained to handle Category 1 non-friable asbestos-containing roof materials. All work must be conducted in accordance with the requirements of MA DEP 310 CMR 7.15(10). However, the Contractor must submit a notification to the MA DEP 10 business days prior to starting the work. This notification form BWP AQ-04 may be obtained on the MA DEP web site and submitted electronically. Asbestos-containing roof materials may be disposed of in a solid waste landfill as permitted by the MA DEP.

1.5 Cost Estimates

In **Table 3**, SWA has provided estimates of abatement costs associated with all identified ACBM in the inspected areas. These estimates are based on current industry standards that may fluctuate rapidly based on a variety of factors: the prevailing economic climate, seasonal differences, union labor considerations, scale of the abatement, occupancy of the building, and so on. SWA recommends that qualified abatement contractors be solicited to determine actual pricing involved. In addition to pricing for abatement, SWA has considered anticipated industrial hygiene costs associated with abatement, including air monitoring and oversight of the abatement.

Table 3 • Estimated Costs for Removal of ACBM		
Type of Material	Quantity/Unit cost (\$)	Total Cost (\$)
Brown flooring/leveler	150 sf @ 10/sf	1,500.
Gray pipe insulation debris	1 lf @ 50/lf	50.
Black rolled roofing and roofing felt	8,500 sf @ 3/sf	25,500.
Black chimney flashing	15 sf @ 20/sf	300.
Total Abatement Cost		\$ 27,350.
Total Industrial Hygiene Fee		7,500.
Total Fee		\$ 31,750.

2.0 LEAD-BASED PAINTS

2.1 Scope of Work

SWA's accredited lead paint inspector tested representative painted surfaces throughout the building. SWA analyzed paints for lead content using the NITON XLS-303-A, X-ray fluorescence analyzer (XRFA) following the manufacturer's instructions for initial calibration and operation. The XRFA uses a radioactive source to excite the electrons of lead atoms (if present) in paint. As the lead atom electrons return to their normal state, they emit x-rays that are measured by the XRFA, then processed and the results converted to milligrams of lead per square centimeter of sampled surface area. On most substrates, the XRFA is precise to +0.1 mg/cm².

Surfaces tested included, but were not limited to walls, ceilings, columns, doors, casings/jambes, shelves, and other miscellaneous surfaces.

2.2 Regulatory Guidance

In all areas where LBP is disturbed by renovation work and where components covered by LBP are disposed of, applicable OSHA and EPA regulations apply.

OSHA

Renovation or demolition activities that disturb surfaces that contain lead must be conducted in accordance with the OSHA regulation 29 CFR 1926.62 "Lead Exposure in Construction: Interim Final Rule." This regulation requires that a site-specific health and safety plan be prepared before conducting activities that create airborne lead emissions. Such a plan should include the identification of lead components, an exposure assessment, and, if applicable, the required work procedures and personnel protection to be used.

An exposure assessment in the form of personal air monitoring must be performed if there is the potential for employees to be exposed to lead due to the renovation or demolition activity. If demolition is being conducted that will disturb lead-based paints, the employer must assume that employee exposure is in excess of the Permissible Exposure Limit (PEL) of 50 micrograms per cubic meter of air ($\mu\text{g}/\text{m}^3$) until the exposure assessment is completed. If the PEL is exceeded, employees are required to use half-face mask respirators with HEPA filter cartridges. Furthermore, a written respirator program is required per 29 CFR 1910.134. The lead standard also requires the following protective measures be taken until the exposure assessment is completed:

- Isolation of the work area;
- appropriate personal protective clothing and equipment;
- change areas and hand washing facilities;
- biological monitoring; and

- training

The results of the initial exposure assessment will determine the protective measures that must be followed for the remainder of the project. OSHA may allow air-monitoring data from previous projects conducted under conditions closely resembling the present project to be used for the exposure assessment. If the exposure assessment indicates that exposure levels are below the Action Level of $30 \mu/m^3$, there are no additional requirements under the standard if the conditions remain the same.

EPA

In addition to the worker protection requirements stipulated by OSHA, MA DLS and the EPA regulate the disposal of wastes that are potentially hazardous. Such wastes may include paint chips and residue generated during abatement or repainting work, or whole components, such as wood windows, doors, and trim that are coated with LBP and that are disposed of as the result of renovation or demolition work. Metal components are not regulated if they will be recycled and not disposed of in a landfill.

To determine the required method for disposing of permeable items coated with LBP, the MA DEP and the EPA require representative sampling of the debris to determine the quantity of lead that would be expected to leach into the environment if the debris were disposed of in a landfill. The representative sample(s) must be analyzed by the Toxicity Characteristic Leaching Process (TCLP). If the result of this procedure indicates that the sample leaches a lead concentration below five parts per million (ppm), the debris is not regulated and can be disposed of in a traditional construction landfill. However, the debris must be disposed of as hazardous waste if the TCLP result exceeds 5 ppm. To minimize the total volume of hazardous waste, segregating hazardous from nonhazardous waste is advisable.

HUD

The United States Department of Housing and Urban Development (HUD) has established a standard for lead-based paint, as tested using an XRF analyzer, of 1.0 mg/cm^2 . Although this standard only applies to housing funded by the federal government, it is a useful reference concentration for assessing hazards associated with lead in paint in other settings. Thus, when paint contains greater than 1.0 mg/cm^2 , special care should be taken when conducting activities that impact these paints. When conducting abrasive blasting, torch burning, or similar activities that generate significant dust or fume, hazards can be caused even at concentrations below the HUD standard.

2.3 Findings

Analysis of painted surfaces throughout the site indicate that lead levels range from $<0.1 \text{ mg/cm}^2$ to 10.9 mg/cm^2 . A summary of paints with elevated concentrations of lead (greater than 1.0 mg/cm^2) is presented in **Table 2**, and the results of all testing are presented in Appendix B.

Table 4 • Summary of Surfaces Coated With LBP				
Location	Substrate	Color	Component	Approx. Quantity
1st floor				
Hall at Main Entry	Metal	Beige	Vertical beam	1 beam
	Metal	Yellow	Stair system	1 system
Boiler Room	Concrete	White	Wall/ceiling	1,500 sf
Men's Room	Cinder Block	White	Wall	250 sf
Main Garage	Metal	Yellow	Safety posts	18 posts
2nd Floor				
Storage Above Break Room	Wood	Gray	Ceiling	250 sf
Exterior				
Southwest Garage, Rear	Cinder Block	White	Wall	300 sf

2.4 Conclusions and Recommendations

Based on our findings, SWA offers the following conclusions and recommendations:

1. Limited lead containing materials were identified at the site. Handling or impacting materials that are covered by LBP may require compliance with the OSHA lead standard. To minimize exposure to airborne dust or fumes, torch burning, cutting, grinding, or similar high impact work on materials covered by LBP should be avoided. Such work would need to be conducted by properly trained workers using appropriate worker protection and engineering controls.
2. For work activities that may generate airborne lead, the contractor(s) should perform an initial exposure assessment (personal air monitoring) for each individual task (e.g. demolition, abrasive blasting, and painting) that has the potential for causing worker exposure to be at or above the OSHA Action Level. In lieu of monitoring, historical data from similar operations may be used to comply with OSHA requirements.
3. In order to determine proper disposal requirements, samples of the building materials that will best represent the waste stream must be collected for TCLP testing to determine the level of lead that will leach into the landfill soil. Based on SWA's XRF test results, it is likely that all waste can be disposed as general construction debris.

2.5 Cost Estimates

SWA estimates that costs associated with OSHA and EPA compliance relative to lead paint to be approximately **\$1,500** for this site. If all LBP components were to be deleaded or if TCLP testing fails, the costs could be increased significantly.

3.0 POLYCHLORINATED BIPHENYLS (PCBs)

3.1 Scope of Work

Typically, the words “No PCBs” are imprinted on affixed labels on the housing of ballasts if it does not contain PCBs. To determine if light ballasts contained PCBs, SWA inspected representative ballasts associated with each type of fluorescent light fixture identified at the site.

SWA also collected samples of window caulking and window glazing compound for laboratory analysis to determine for concentrations of PCBs. Sample collection occurred in locations that appeared to be representative of those materials throughout the building. A minimum five gram piece of material was taken from the substrate, placed into labeled individual sealed containers. The samples were labeled and descriptions were recorded on a field data sheet and delivered using appropriate chain-of-custody to NetLab of West Warwick, Rhode Island, for analysis. NetLab employed EPA method SW846 utilizing sample extraction method 8081 and analytical method 8028, gas chromatography, to analyze the samples (see Appendix C of this report).

3.2 Background/Regulatory Guidance

According to the EPA, PCBs are toxic and persistent chemicals that were used primarily as insulating fluid in heavy-duty electrical equipment. They were also utilized in a wide variety of products including paints, caulks, light fixture ballast, oils, plastics, adhesives, tapes, carbonless copy paper, floor finishes and related products. Because PCBs are suspected carcinogens and may cause other adverse health effects, the EPA banned their manufacture and installation starting in 1979.

Any materials containing PCBs equal to or greater than 50 parts per million (ppm) are regulated under the Toxic Substance Control Act and the PCB regulation found at 40 CFR Part 761. Further, EPA policy, as described in “Current Best Practices for PCBs in Caulk Fact Sheet” updated in September, 2009, is that PCBs at concentrations greater than 50 ppm are not authorized for use and must be removed and properly disposed of.

Additionally, where <50 ppm caulk or PCB remediation waste is present, it may be regulated for removal and/or cleanup unless the <50 ppm PCB caulk meets the definition of an Excluded PCB Product as defined under 40 CFR Part 761.3. Excluded products would include those legally installed before October 1, 1984 and the resulting PCBs concentration is not the result of dilution or leaks or spills from other products. Thus, if a formerly installed PCB caulk containing greater than 50 ppm had been removed and replaced by a non-PCB caulk, the non-PCB caulk could be contaminated from the residue of the former caulk. In this instance, if the non-PCB caulk tested at a concentration above one ppm, it would be regulated as PCB containing.

Further, because PCBs may have leached into surrounding substrates, such as brick, CMU, and cement, or may have degraded and contaminated adjacent soil, assessment of masonry and soils is necessary on instances where PCBs are present in caulk or other building materials. Where analysis indicates contaminant concentrations above one ppm in masonry or soils, remedial actions are required.

3.3 Findings

Ballasts representative of the large majority of light fixtures contained the "No PCBs" wording on the affixed labels and therefore are assumed to not contain PCBs in their capacitor oils. However, all individual ballasts must be inspected for the "No PCB" wording on affixed labels to determine proper disposal/recycling requirements.

Analytical results indicate that the concentration of PCBs in the window caulking and window glazing compound tested below the detection limit of the analytical laboratory, 0.1 ppm. This is below the EPA regulated standard for PCBs of 50 ppm.

Table 5 • Results of PCB Sampling		
Material sampled	Location	Result (ppm)
White window caulking	Main garage, north side	None Detected
Tan window glazing compound	Main garage, east end	None Detected

3.3 Conclusions and Recommendations

Based on our observations, we conclude the following:

1. Prior to renovation or demolition all ballasts should be inspected for the "No PCB" wording on the label to determine appropriate segregation and recycling requirements. The ballasts that do not contain the "No PCBs" wording on the affixed label are assumed to contain PCB oils and must be segregated for proper disposal/recycling.
2. Of those materials sampled and analyzed none were determined to contain PCBs. Therefore, there are no special handling and or disposal requirements relative to PCBs in building materials at this site..

3.4 Cost Estimates

SWA estimates that the cost to inspect and remove individual ballasts and other components at the site should not exceed **\$1,500**.

4.0 MERCURY COMPONENTS

4.1 Scope of Work

SWA's inspector observed fluorescent light bulbs suspected of containing mercury in the building. Typically when fluorescent light fixtures, thermostats, or switches will be removed and disposed of, SWA makes a conservative assumption that they contain mercury and should be handled as a regulated waste. These materials are classified as "Universal Wastes" and must be appropriately handled and packaged for disposal or recycling.

4.2 Findings

SWA observed fluorescent light bulbs that if impacted by renovations must be collected and recycled in accordance with the "Universal Waste" regulatory requirements. The fluorescent bulbs are located throughout the spaces.

SWA estimates that there are 200 (4') and 5 (8') fluorescent bulbs that would require recycling. Four heat regulating thermostats with a total of seven associated mercury tubes were observed in the space.

4.3 Conclusions and Recommendations

Based on our observations, SWA offers the following conclusions and recommendations.

1. Prior to being impacted, all fluorescent light bulbs and any heat regulating thermostats with associated mercury tubes must be collected and properly packaged for disposal or recycling in a facility permitted to accept mercury containing waste.

4.4 Cost Estimates

The cost to collect and dispose/recycle the fluorescent light bulbs and thermostats at this site is not expected to exceed **\$1,000**.

APPENDIX A

Certificates of Asbestos Bulk Sample Analysis (PLM & TEM)



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Customer ID: SMIT50B

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Received Date: 11/25/2016 9:54 AM

Analysis Date: 11/25/2016

Collected Date: 11/22/2016

Project: 16487 / 195 Main Street, Wayland MA

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
01A 141604955-0001	1st floor reception - blue 12"x12" floor tile	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
01B 141604955-0002	1st floor front middle office - blue 12"x12" floor tile	Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
02A 141604955-0003	1st floor reception - black & yellow mastic on 01	Black/Yellow Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
02B 141604955-0004	front middle office - black & yellow mastic on 01	Black/Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
03A 141604955-0005	1st floor front office - tan flooring	Brown Fibrous Homogeneous		98% Non-fibrous (Other)	2% Chrysotile
03B 141604955-0006	1st floor front office - tan flooring				Positive Stop (Not Analyzed)
04A 141604955-0007	1st floor front office - black mastic on 03	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
04B 141604955-0008	1st floor front office - black mastic on 03	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
05A 141604955-0009	1st floor office area - yellow baseboard mastic	Tan Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
05B 141604955-0010	1st floor reception - yellow baseboard mastic	Brown/Tan Non-Fibrous Heterogeneous		100% Non-fibrous (Other)	None Detected
06A 141604955-0011	2nd floor storage above reception - gray pipe insulation air cell	Gray Fibrous Homogeneous	50% Cellulose		50% Chrysotile
06B 141604955-0012	2nd floor storage above reception - gray pipe insulation air cell				Positive Stop (Not Analyzed)
06C 141604955-0013	2nd floor storage above reception - gray pipe insulation air cell				Positive Stop (Not Analyzed)
07A 141604955-0014	1st floor ladies room - gray 9"x9" floor tile	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
07B 141604955-0015	1st floor ladies room - gray 9"x9" floor tile	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 11/25/2016 15:32:54



EMSL Analytical, Inc.

490 Rowley Road Depew, NY 14043

Tel/Fax: (716) 651-0030 / (716) 651-0394

<http://www.EMSL.com> / buffalolab@emsl.com

EMSL Order: 141604955
Customer ID: SMIT50B
Customer PO:
Project ID:

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
08A 141604955-0016	1st floor ladies room - yellow mastic on 07	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
08B 141604955-0017	1st floor ladies room - yellow mastic on 07	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09A 141604955-0018	1st floor ladies room - white textured ceiling	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09B 141604955-0019	1st floor ladies room - white textured ceiling	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
09C 141604955-0020	1st floor ladies room - white textured ceiling	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
10A 141604955-0021	1st floor reception - white gypsum board	Gray Fibrous Homogeneous	1% Cellulose 2% Glass	97% Non-fibrous (Other)	None Detected
10B 141604955-0022	1st floor ladies room - white gypsum board	Gray Fibrous Homogeneous	4% Cellulose 3% Glass	93% Non-fibrous (Other)	None Detected
10C 141604955-0023	2nd floor garage offices - white gypsum board	Gray Fibrous Homogeneous	3% Cellulose	97% Non-fibrous (Other)	None Detected
11A 141604955-0024	1st floor ladies room - white jt. compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
11B 141604955-0025	1st floor ladies room - white jt. compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
11C 141604955-0026	2nd floor garage offices - white jt. compound	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
12A 141604955-0027	1st floor main garage north - white interior window caulking	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
12B 141604955-0028	1st floor main garage north - white interior window caulking	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13A 141604955-0029	1st floor main garage east - tan interior window glazing	Gray/White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
13B 141604955-0030	1st floor main garage east - tan interior window glazing	White Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14A 141604955-0031	2nd floor garage office - tan 12"x12" floor tile	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
14B 141604955-0032	2nd floor garage office - tan 12"x12" floor tile	Brown Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15A 141604955-0033	2nd floor garage office - yellow mastic on 14	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
15B 141604955-0034	2nd floor garage office - yellow mastic on 14	Yellow Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Initial report from: 11/25/2016 15:32:54



EMSL Analytical, Inc.

490 Rowley Road Depew, NY 14043

Tel/Fax: (716) 651-0030 / (716) 651-0394

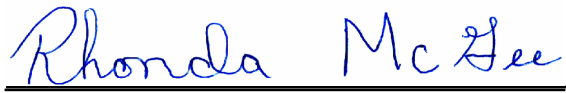
<http://www.EMSL.com> / buffalolab@emsl.com

EMSL Order: 141604955
Customer ID: SMIT50B
Customer PO:
Project ID:

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

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
16A <small>141604955-0035</small>	shed roof south side - black three tab shingle	Black Fibrous Homogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
16B <small>141604955-0036</small>	shed roof south side - black three tab shingle	Black Fibrous Homogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
17A <small>141604955-0037</small>	southwest flat roof - black tar flashing	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
17B <small>141604955-0038</small>	main roof north drip edge - black tar flashing	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
18A <small>141604955-0039</small>	southwest flat roof - black roofing felts and rooed roofing	Black Fibrous Homogeneous	20% Glass	80% Non-fibrous (Other)	None Detected
18B <small>141604955-0040</small>	southwest flat roof - black roofing felts and rooed roofing	Black Fibrous Homogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
19A <small>141604955-0041</small>	main roof south - black roofing felts and rooed roofing	Brown/Black Fibrous Heterogeneous	8% Glass	92% Non-fibrous (Other)	None Detected
19B <small>141604955-0042</small>	main roof north - black roofing felts and rooed roofing	Brown/Black Fibrous Heterogeneous		95% Non-fibrous (Other)	5% Chrysotile
20A <small>141604955-0043</small>	original roof - black chimney tar flashing	Black Fibrous Homogeneous		96% Non-fibrous (Other)	4% Chrysotile
20B <small>141604955-0044</small>	original roof - black chimney tar flashing				Positive Stop (Not Analyzed)
21A <small>141604955-0045</small>	wooden garage - black rolled roofing	Gray/Black Fibrous Homogeneous	20% Glass	80% Non-fibrous (Other)	None Detected
21B <small>141604955-0046</small>	wooden garage - black rolled roofing	Gray/Black Fibrous Homogeneous	5% Glass	95% Non-fibrous (Other)	None Detected
22A <small>141604955-0047</small>	main garage east - gray exterior door caulking	Gray/Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
22B <small>141604955-0048</small>	main garage east - gray exterior door caulking	Gray/Blue Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected

Analyst(s) _____
 Shauna Strnad (44)


 Rhonda McGee, Laboratory Manager
 or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%

Samples analyzed by EMSL Analytical, Inc. Depew, NY NVLAP Lab Code 200056-0

Initial report from: 11/25/2016 15:32:54

APPENDIX B

Results of Testing for Lead Based Paint (LBP)

Lead Based Paint Testing Results 195 Main Street Wayland, MA				
Location	Substrate	Color	Component	Result mg/cm ²
1st Floor				
Main Office Area	Wood	White	Wall paneling	<0.1
	Metal	Brown	Door	<0.1
	Metal	Black	Circular stairs	<0.1
Hall at Main Entry	Cinder Block	White	Wall	<0.1
	Concrete	Black	Floor	<0.1
	Wood	White	Ceiling	<0.1
	Metal	Beige	I-beam	<0.1
	Metal	Beige	Vertical beam	3.8 – 6.6
	Metal	Yellow	Stair system	4.5 – 5.5
Boiler Room	Concrete	White	Wall/ceiling	3.3
Men's Room	Cinder Block	White	Wall	1.8
TV Room	Cinder Block	White	Wall	<0.1
Ladies Room	Sheet Rock	White	Wall	<0.1
Main Garage	Cinder Block	Beige	Wall	<0.1
	Metal	Yellow	Safety posts	10.9
Original Garage	Metal	Orange	Door system	<0.1
	Cinder Block	White/Blue	Wall	<0.1
	Sheet Rock	White	Wall	<0.1
Bathroom at Break Room	Ceramic Tile	White	Wall	<0.1
Southwest Garage	Cinder Block	Gray	Wall	<0.1
Southwest Office	Cinder Block	Brown	Wall	<0.1
2nd Floor				
Garage Office	Metal	Yellow	Stair system	<0.1 – 0.3
	Sheet Rock	White	Wall	<0.1
Storage Above Break Room	Cinder Block	Blue	Wall	<0.1
	Wood	Gray	Ceiling	4.0
Exterior				
Main Garage	Cinder Block	Beige	Wall	0.3

Lead Based Paint Testing Results 195 Main Street Wayland, MA				
Location	Substrate	Color	Component	Result mg/cm ²
	Metal	Beige	Garage door edge	<0.1
	Metal	Yellow	Safety posts	<0.1
Southwest Garage, Rear	Cinder Block	White	Wall	2.4 – 3.8
	Concrete	Tan	Foundation	<0.1
Southwest Garage, Front	Cinder Block	White	Wall	0.3 – 0.5
Original Garage	Concrete	White	Column	<0.1
West Entry	Brick	White	Wall	<0.1
Original North Entry	Brick	White	Wall	<0.1
	Metal	Blue	Railing	0.1
Wooden Garage	Wood	Gray	Siding	<0.1

Note: All testing was conducted using a NITON XLS-303A. Limit of detection = 0.1 mg/cm².

APPENDIX C

Certificates of Analysis **(PCBs)**



REPORT OF ANALYTICAL RESULTS

NETLAB Case Number C1123-06

Prepared for:

Smith & Wessel Associates
188 Greenville Street
Spencer, MA 01562

Report Date: November 30, 2016

Director
New England Testing Laboratory, Inc.
Lab # RI010

NEW ENGLAND TESTING LABORATORY, INC.

59 Greenhill Street, West Warwick, RI 02893

(401) 353-3420

MassDEP Analytical Protocol Certification Form

Laboratory Name: New England Testing Laboratory, Inc.

Project #: 16487

Project Location: 195 Main Street, Wayland, MA

RTN:

This Form provides certifications for the following data set: list Laboratory Sample ID Number(s):
C1123-06

Matrices: Groundwater/Surface Water Soil/Sediment Drinking Water Air x Other: Glaze, Caulk

CAM Protocol (check all that apply below):

8260 VOC CAM II A	7470/7471 Hg CAM III B	MassDEP VPH CAM IV A	8081 Pesticides CAM V B	7196 Hex Cr CAM VI B	MassDEP APH CAM IX A
8270 SVOC CAM II B	7010 Metals CAM III C	MassDEP EPH CAM IV B	8151 Herbicides CAM V C	8330 Explosives CAM VIII A	TO-15 VOC CAM IX B
6010 Metals CAM III A	6020 Metals CAM III D	8082 PCB CAM V A x	9014 Total Cyanide/PAC CAM VI A	6860 Perchlorate CAM VIII B	

Affirmative Responses to Questions A through F are required for "Presumptive Certainty" status

A	Were all samples received in a condition consistent with those described on the Chain-of-Custody, properly preserved (including temperature) in the field or laboratory, and prepared/analyzed within method holding times?	x Yes	No
B	Were the analytical method(s) and all associated QC requirements specified in the selected CAM protocol(s) followed?	x Yes	No
C	Were all required corrective actions and analytical response actions specified in the selected CAM protocol(s) implemented for all identified performance standard non-conformances?	x Yes	No
D	Does the laboratory report comply with all the reporting requirements specified in CAM VII A, "Quality Assurance and Quality Control Guidelines for the Acquisition and Reporting of Analytical Data"?	x Yes	No
E	VPH, EPH, APH, and TO-15 only: a. VPH, EPH, and APH Methods only: Was each method conducted without significant modification(s)? (Refer to the individual method(s) for a list of significant modifications). b. APH and TO-15 Methods only: Was the complete analyte list reported for each method?	Yes	No
F	Were all applicable CAM protocol QC and performance standard non-conformances identified and evaluated in a laboratory narrative (including all "No" responses to Questions A through E)?	x Yes	No

Responses to Questions G, H and I below are required for "Presumptive Certainty" status

G	Were the reporting limits at or below all CAM reporting limits specified in the selected CAM protocol(s)?	x Yes	No ¹
----------	---	-------	-----------------

Data User Note: Data that achieve "Presumptive Certainty" status may not necessarily meet the data usability and representativeness requirements described in 310 CMR 40. 1056 (2)(k) and WSC-07-350.

H	Were all QC performance standards specified in the CAM protocol(s) achieved?	x Yes	No ¹
I	Were results reported for the complete analyte list specified in the selected CAM protocol(s)?	x Yes	No ¹

¹All negative responses must be addressed in an attached laboratory narrative.

I, the undersigned, attest under the pains and penalties of perjury that, based upon my personal inquiry of those responsible for obtaining the information, the material contained in this analytical report is, to the best of my knowledge and belief, accurate and complete.

Signature: 

Position: Laboratory Director

Printed Name: Richard Warila

Date: 11/30/2016

SAMPLES SUBMITTED and REQUEST FOR ANALYSIS:

The samples listed in Table I were submitted to New England Testing Laboratory on November 23, 2016. The group of samples appearing in this report was assigned an internal identification number (case number) for laboratory information management purposes. The client’s designations for the individual samples, along with our case numbers, are used to identify the samples in this report. This report of analytical results pertains only to the sample(s) provided to us by the client which are indicated on the custody record. The case number for this sample submission is C1123-06.

Custody records are included in this report.

Site: 16487 – 195 Main Street, Wayland, MA

TABLE I, Samples Submitted

Sample ID	Date Sampled	Matrix	Analysis Requested
PCB-01	11/22/2016	Caulk	Table II
PCB-02	11/22/2016	Glaze	Table II

TABLE II, Analysis and Methods

ANALYSIS	PREPARATION METHOD	DETERMINATIVE METHOD
PCB’s	3540C	8082A

These methods are documented in:

Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, USEPA/OSW.

CASE NARRATIVE:

Sample Receipt

The samples were all appropriately cooled and preserved upon receipt. The samples were received in the appropriate containers. The chain of custody was adequately completed and corresponded to the samples submitted.

PCBs

All samples were extracted and analyzed within method specified holding times and according to NETLAB's documented standard operating procedures. The results for the associated calibration, method blank and laboratory control sample (LCS) were within method specified quality control criteria.

RESULTS: PCBs

The presence of the NETLAB LOGO in the top right corner of each page in this section indicates:

The Technical Manager of the Organics Analysis Department certifies that the samples included in this section have been prepared and analyzed using the procedures cited and that the results have been reviewed and approved. Any exceptions or qualifications of substance have been reported in the case narrative.

Sample: PCB-01		Analyst's Initials: BJ
Case No.: C1123-06		
Date Collected: 11/22/2016		
Sample Matrix: Solid		
Subject: PCBs	Date Extracted	Date Analyzed
Prep Method: EPA 3540C	11/28/16	11/30/16
Analytical Method: EPA 8082A		
Compound	Concentration ug/kg (ppb)	Reporting Limit ug/kg (ppb)
Aroclor-1016	N.D.	200
Aroclor-1221	N.D.	200
Aroclor-1232	N.D.	200
Aroclor-1242	N.D.	200
Aroclor-1248	N.D.	200
Aroclor-1254	N.D.	200
Aroclor-1260	N.D.	200
Aroclor-1262	N.D.	200
Aroclor-1268	N.D.	200
Surrogates:		
Compound	% Recovery	Limits
TCMX	100	30-129
DCBP	88	37-126

N.D. = Not Detected

Sample: PCB-02		Analyst's Initials: BJ
Case No.: C1123-06		
Date Collected: 11/22/2016		
Sample Matrix: Solid		
Subject: PCBs	Date Extracted	Date Analyzed
Prep Method: EPA 3540C	11/28/16	11/30/16
Analytical Method: EPA 8082A		
Compound	Concentration ug/kg (ppb)	Reporting Limit ug/kg (ppb)
Aroclor-1016	N.D.	200
Aroclor-1221	N.D.	200
Aroclor-1232	N.D.	200
Aroclor-1242	N.D.	200
Aroclor-1248	N.D.	200
Aroclor-1254	N.D.	200
Aroclor-1260	N.D.	200
Aroclor-1262	N.D.	200
Aroclor-1268	N.D.	200
Surrogates:		
Compound	% Recovery	Limits
TCMX	71	30-129
DCBP	82	37-126

N.D. = Not Detected

Sample: Method Blank		Analyst's Initials: BJ
Case No.: C1123-06		
Date Collected: NA		
Sample Matrix: Solid		
Subject: PCBs	Date Extracted	Date Analyzed
Prep Method: EPA 3540C	11/28/16	11/30/16
Analytical Method: EPA 8082A		
Compound	Concentration ug/kg (ppb)	Reporting Limit ug/kg (ppb)
Aroclor-1016	N.D.	200
Aroclor-1221	N.D.	200
Aroclor-1232	N.D.	200
Aroclor-1242	N.D.	200
Aroclor-1248	N.D.	200
Aroclor-1254	N.D.	200
Aroclor-1260	N.D.	200
Aroclor-1262	N.D.	200
Aroclor-1268	N.D.	200
Surrogates:		
Compound	% Recovery	Limits
TCMX	80	30-129
DCBP	91	37-126

N.D. = Not Detected

PCB Laboratory Control Spike

Subject: PCB	Date Extracted			Date Analyzed
Prep Method: EPA 3540C	11/28/16			11/30/16
Analytical Method: EPA 8082A				
Compound	Amount Spiked mg/kg	Result mg/kg	Recovery %	Recovery Limits
Aroclor 1016	0.500	0.441	88	72-118
Aroclor 1260	0.500	0.487	97	73-131
Surrogates:				
Compound	% Recovery	Limits		
TCMX	82	30-129		
DCBP	95	37-126		

C1123-06

NEW ENGLAND TESTING LABORATORY, INC.
 1254 Douglas Avenue
 North Providence, RI 02904
 1-888-863-8522

CHAIN OF CUSTODY RECORD

PROJ. NO.	PROJECT NAME/LOCATION	DATE	TIME	C O M P	G R A B	SAMPLE I.D.	A C C E S S	S O L	O T H E R	N O. OF CONTAINERS	PRESERVATIVE	REMARKS
											TESTS	
10487	195 Main Street, Wayland, MA	11-22-16	11:10	✓	✓	PCB-01		✓		1	none	White window glazing main garage
	CLIENT: Smith & Wessel Associates	"	11:30	✓	✓	PCB-02		✓		1	none	White window glazing north side
	Sampled by: (Signature) <i>Erik Carlson</i>	Date/Time 11-22 11:16	Date/Time 11-22 12:30	Received by: (Signature)	Received by: (Signature)	Received by: (Signature)	Received for Laboratory by: (Signature)	Date/Time 11/23/16	Date/Time 12:30	Date/Time 11/23/16	12:30	Turnaround (Business Days) 5 days

**Netlab subcontractor the following tests: Radiologicals, Radon, Asbestos, UCMRs, Perchlorate, Bromate, Bromide, Sieve, Salmonella, Carbamates

APPENDIX D

Photographs

Photo Documentation – Wayland Highway Garage, Wayland, MA



Side entrance



Original building



Asbestos-containing flooring/leveler under carpet



Mercury thermostat



Non-PCB ballast



No suspect materials above ceilings

Photo Documentation - Wayland Highway Garage, Wayland, MA



Asbestos-containing pipe insulation debris



Fiberglass insulation in boiler room



Lead paint on safety posts



Asbestos-containing roofing on main roof



Asbestos-containing tar flashing on chimney



No waterproofing observed on foundation