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RESURGAM. CITY OF PORTLAND, MAINE
Reviewed for Code Compliance
Inspections Division
Approved with Conditions
Date: 11/04/13

August 1, 2013

Mr. David Ingraham
9 Brookside Terrace
Veazie, ME 04401-7079

Re: Garage at 9 Ray Street
Building Survey Findings
RPF File No. 135532

Dear David:

On July 8, 2013, RPF Environmental, Inc. (RPF) conducted a survey of the garage located at 9 Ray Street in Portland, Maine. The survey was performed in as designated by you for accessible asbestos-containing building material (ACBM) as indicated herein. Below is a summary of findings and attached to this report are the survey data tables, laboratory results, survey methodologies and limitations.

Summary of Findings

The garage surveyed at 9 Ray Street in Portland, Maine consists of a single story wood structure with asphalt roofing and wood siding. The main garage is approximately 320 square feet and there is an approximately 160 square foot storage area on the rear side of the building.

The scope of the survey included accessible asbestos-containing building material in accordance with the initial asbestos inspection requirements prior to renovation or demolition work as stated in the State regulations and applicable federal regulations. Asbestos is the name for a group of naturally occurring minerals that separate into strong, very fine fibers. The adverse health effects associated with asbestos exposure have been extensively studied for many years. Results of these studies and epidemiological investigations have demonstrated that inhalation of asbestos fibers may lead to increased risk of developing one or more diseases. In all cases, extreme care must be used not to disturb asbestos-containing materials or to create fiber release episodes.

In the accessible locations surveyed, RPF identified four (4) homogeneous groups of accessible suspect asbestos-containing building material. Suspect materials were identified based on current industry standards, EPA, and other guideline listings of potential suspect ACBM. A total of ten (10) samples were extracted from the different groups of suspect material in accordance with EPA and Maine DEP sampling protocols. Based on the laboratory results and survey findings, accessible ACBM was not identified. However, care should be used during demolition to inspect for possible concealed suspect material that was not accessible at the time of this inspection. If concealed suspect material is encountered during demolition, work should cease until proper testing and inspection is performed. Stored personal belongings were not inspected.

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In accordance with current regulatory requirements, ACBM that may be impacted (such that asbestos fiber release occurs) by renovation, demolition or other such activ removed by qualified, licensed firms, as applicable. Although regulations for nonfriable ACBM are somewhat less stringent than the requirements for friable ACB be noted that nonfriable ACBM that is subjected to grinding, abrasion, and other forces, could be rendered friable. In this event, the nonfriable ACBM would be re-categorized friable ACBM. ACBM that will not be impacted by renovation or demolition activity may be left in place if managed properly and if the materials are maintained in good condition.

Appropriate notifications, labeling and other hazard communications should be completed to all employees, contractors and others in accordance with US OSHA regulations and other applicable requirements (including asbestos labeling in accordance with 29 CFR Part 1926). The scope of RPF services for this survey did not include labeling of ACBM or hazard communications to other employees, building occupants, contractors, or subcontractors.

With the exception of the specific testing and analysis detailed herein, no other samples of materials, oil, water, ground water, air, or other suspect hazardous materials were collected in the course of this inspection that supports or denies these conclusions. No additional services beyond those explicitly stated herein were performed and none should be inferred or implied. The summary and conclusions are based on reasonably ascertainable information as described in this report. RPF Environmental, Inc. makes no guarantees, warranties, or references regarding this property or the condition of the property after the period of this report.

If you have any questions at this time, or if you would like to discuss the remediation process, please call our office.

Sincerely,
RPF ENVIRONMENTAL, INC.

Roger Francoeur

Roger Francoeur
Project Manager

Enclosures:
Appendix A: Analytical Tables
Appendix B: Pictures
Appendix C: Summary of Methodology and Limitations

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DAVID INGRAHAM
9 Ray Street, Portland, ME

SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS
Polarized Light Microscopy with Gravimetric Reduction
EPA 600/R-93/116 and 600/M4-82-020 Method

Samples Collected: July 8, 2013

Sample ID	Sample Description	Organic Weight Percent	Acid Soluble Weight Percent	Other Non-Asbestos Weight Percent	Asbestos Weight Percent
070813-HG01a	Roofing, garage rear storage, north edge	59.2	0	40.8	No Asbestos Detected
070813-HG01b	Roofing, garage, rear storage, center	25.8	0	74.2	No Asbestos Detected
070813-HG01c	Roofing, garage rear storage, south edge	25.5	0	74.5	No Asbestos Detected
070813-HG02a	Roofing, garage, north edge	31.6	0	68.4	No Asbestos Detected
070813-HG02b	Roofing, garage, center	68.8	0	31.2	No Asbestos Detected
070813-HG02c	Roofing, garage, south edge	40.6	0	59.4	No Asbestos Detected
070813-HG03a	Window glaze, residual, south side peak	11.2	79.6	9.2	No Asbestos Detected
070813-HG04a	Siding felt paper, south corner	93.0	0	7.0	No Asbestos Detected
070813-HG04b	Siding felt paper, west side	95.8	0	4.2	No Asbestos Detected
070813-HG04c	Siding felt paper, front by doors	93.6	0	6.4	No Asbestos Detected

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Notes:

- Trace means less than 1%. SFP Means analysis was terminated because asbestos was detected on a previous homogenous sample during the survey work. Please reference the "HG" group number.
- Please reference the full report for discussions and additional information and limitations pertaining to these results.

APPENDIX A

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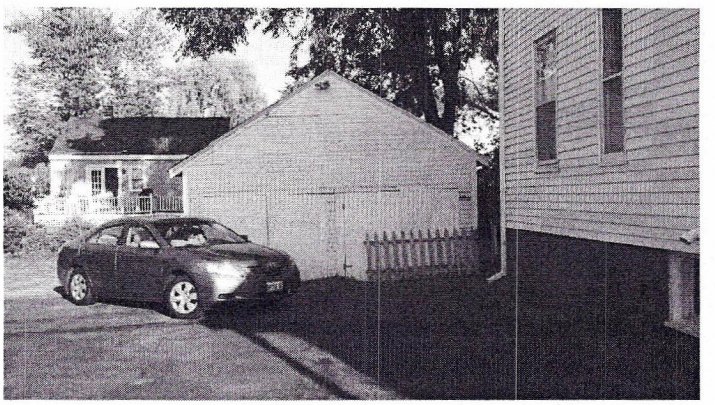
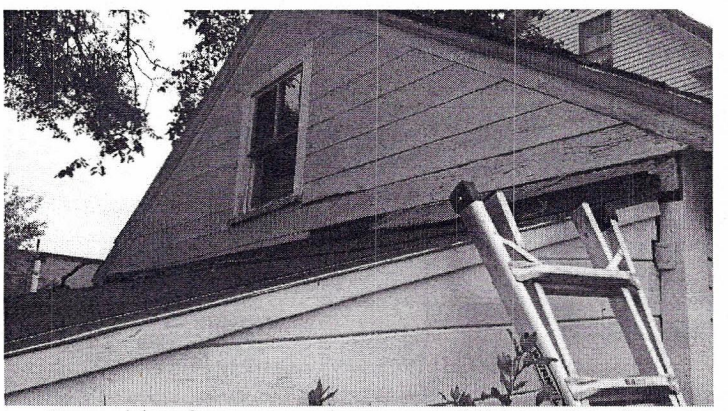
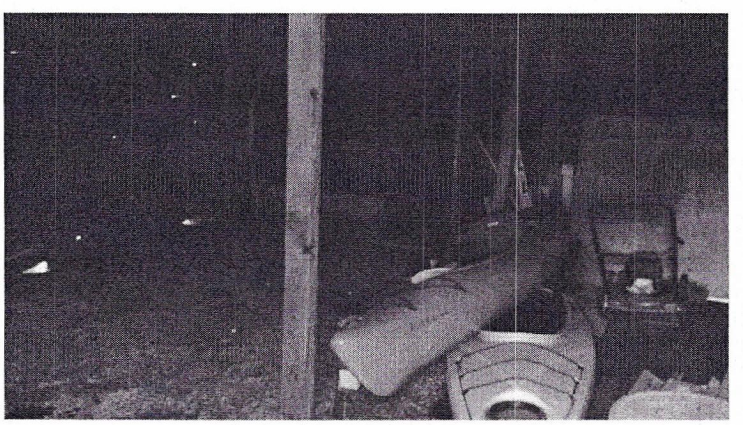


Garage at 9 Ray Street, Portland, Maine



Rear side of garage and storage addition. Roofing, window glaze and siding felt paper all found to be non-detect for asbestos.



Stored items in garage.

APPENDIX B

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Summary of Methodology: Asbestos-Containing Building Materials Survey

EPA accredited inspector(s) surveyed accessible space in the building or site areas include RPF Scope of Work (SOW) to identify suspect asbestos-containing building material (ACB ACBM was inventoried and categorized into homogeneous groups of materials. To the ext in the report, samples were then extracted from the different groups of homogeneous materials in accordance with applicable State and federal rules and regulations. For surveys in which the SOW included full inspections of the affect space, sampling methodologies were based on the requirements set forth in 40 CFR Part 763 (EPA) and 29 CFR Part 1926.1101 (OSHA). For preliminary or limited surveys, findings apply to only the affected material or space as indicated in the RPF SOW and Report and additional inspection and testing will be required to satisfy regulatory obligations associated with renovation, demolition, maintenance and other occupational safety and health requirements.

Collected samples were individually placed into sealed containers, labeled, and submitted with proper chain of custody forms to the RPF NVLAP-accredited vendor laboratory. Sample containers and tools were cleaned after each sample was collected. Samples were analyzed for asbestos content using polarized light microscopy (PLM). Although PLM is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, PLM may not be sensitive enough to detect all of the asbestos fibers in certain types of materials, such as floor tile and other nonfriable ACBM. In the event that more definitive results are requested in cases of with negative or trace results of asbestos are detected, RPF recommends that confirmation testing be completed using transmission electron microscopy.

For each homogeneous group of suspect material, a "stop at first positive" (SFP) method may have been employed during the analysis. The SFP method is based on current EPA sampling protocols and means that if one sample within a homogeneous group of suspect material is found to contain >1% asbestos, then further analysis of that specific homogenous group samples is terminated and the entire homogeneous group of material is considered to be ACBM regardless of the other sample results. This is based on the potential for inconsistent mix of asbestos in the product yielding varying findings across the different individual samples collected from the same homogeneous group. Unless otherwise noted in the report, sample groups found to have 1% to <10% asbestos content are assumed to be ACBM; to rebut this assumption further analysis with point count methods are required.

Inaccessible and hidden areas, including but not limited to wall/floor/ceiling cavity space, space with obstructed access (such as fiberglass insulation above suspended ceilings), sub floors, interiors of mechanical and process equipment, and similar spaces were not included in the inspection and care should be used when accessing these areas in the future. Unless otherwise noted in the RPF Report, destructive survey techniques were not employed during this survey.

In the event that additional suspect materials are encountered that are not addressed in this report, the materials should be properly tested by an accredited inspector. For example, during renovation and demolition it is likely that additional suspect material will be encountered and such suspect materials should be assumed to be hazardous until proper inspection and testing occurs.

RPF followed applicable industry standards; however, various assumptions and limitations of the methods can result in missed materials or misidentification of materials due several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspection, assumptions regarding the determination of homogenous groups of suspect material, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar material. Also reference the Limitations document attached to the report.

APPENDIX C

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LIMITATIONS

1. The observations and conclusions presented in the Report were based solely upon the s herein, and not on scientific tasks or procedures beyond the RPF Environmental, Inc. (SOW) as discussed in the proposal and/or agreement. The conclusions and recommen on visual observations and testing, limited as indicated in the Report, and were arrived with generally accepted standards of industrial hygiene practice and asbestos professiona this survey or monitoring service was limited as indicated herein and in the report or l Further testing, survey, and analysis is required to provide more definitive results and findings.

2. For site survey work, observations were made of the designated accessible areas of the site as indicated in the Report. While it was the intent of RPF to conduct a survey to the degree indicated, it is important to note that not all suspect ACBM material in the designated areas were specifically assessed and visibility was limited, as indicated, due to the presence of furnishings, equipment, solid walls and solid or suspended ceilings throughout the facility and/or other site conditions. Asbestos or hazardous material may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition proceeds. Access and observations relating to electrical and mechanical systems within the building were restricted or not feasible to prevent damage to the systems and minimize safety hazards to the survey team.

3. Although assumptions may have been stated regarding the potential presence of inaccessible or concealed asbestos and other hazardous material, full inspection findings for all asbestos and other hazardous material requires the use of full destructive survey methods to identify possible inaccessible suspect material and this level of survey was not included in the SOW for this project. For preliminary survey work, sampling and analysis as applicable was limited and a full survey throughout the site was not performed. Only the specific areas and /or materials indicated in the report were included in the SOW. This inspection did not include a full hazard assessment survey, full testing or bulk material, or testing to determine current dust concentrations of asbestos in and around the building. Inspection results should not be used for compliance with current EPA and State asbestos in renovation/demolition requirements unless specifically stated as intended for this use in the RPF report and considering the limitations as stated therein and within this limitations document.

4. Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas. The survey results only apply to areas specifically accessed by RPF during the survey. Interiors of mechanical equipment and other building or process equipment may also have asbestos and other hazardous material present and were not included in this inspection. For renovation and demolition work, further inspection by qualified personnel will be required during the course of construction activity to identify suspect material not previously documented at the site or in this survey report. Bordering properties were not investigated and comprehensive file review and research was not performed.

5. For lead in paint, observations were made of the designated accessible areas of the site as indicated in the Report. Limited testing may have been performed to the extent indicated in the text of the report. In order to conduct thorough hazard assessments for lead exposures, representative surface dust testing, air monitoring and other related testing throughout the building, should be completed. This type of in depth testing and analysis was beyond the scope of services for the initial inspection. For lead surveys with XRF readings, it is recommended that surfaces found to have LBP or trace amount of lead detected with readings of less than 4 mg/cm^2 be confirmed using laboratory analysis if more definitive results are required. Substrate corrections involving destructive sampling or damage to existing surfaces (to minimize XRF read-through) were not completed. In some instances, destructive testing may be required for more accurate results. In addition, depending on the specific thickness of the paint films on different areas of a building component, differing amounts of wear, and other factors, XRF readings can vary slightly, even on the same building component. Unless otherwise specifically stated in the scope of services and final report, lead testing performed is not intended to comply with other state and federal regulations pertaining to childhood lead poisoning regulations.

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6. Air testing is to be considered a "snap shot" of conditions present on the day of the understanding that conditions may differ at other times or dates or operational conditior Results are also limited based on the specific analytical methods utilized. For phase cor (PCM) total airborne fiber testing, more sensitive asbestos-specific analysis using tran: microscopy (TEM) can be performed upon request.

7. For asbestos bulk and dust testing, although polarize light microscopy (PLM) is the method currently recognized in State and federal regulations for asbestos identification in bulk samples, some industry studies have found that PLM may not be sensitive enough to detect all of the asbestos fibers in certain nonfriable material, vermiculate type insulation, soils, surface dust, and other materials requiring more sensitive analysis to identify possible asbestos fibers. In the event that more definitive results are requested, RPF recommends that confirmation testing be completed using TEM methods or other analytical methods as may be applicable to the material. Detection of possible asbestos fibers may be made more difficult by the presence of other non-asbestos fibrous components such as cellulose, fiber glass, etc., by binder/matrix materials which may mask or obscure fibrous components, and/or by exposure to conditions capable of altering or transforming asbestos. PLM can show significant bias leading to false negatives and false positives for certain types of materials. PLM is limited by the visibility of the asbestos fibers. In some samples the fibers may be reduced to a diameter so small or masked by coatings to such an extent that they cannot be reliably observed or identified using PLM.

8. For hazardous building material inspection or survey work, RPF followed applicable industry standards; however, RPF does not warrant or certify that all asbestos or other hazardous materials in or on the building has been identified and included in this report. Various assumptions and limitations of the methods can result in missed materials or misidentification of materials due to several factors including but not limited to: inaccessible space due to physical or safety constraints, space that is difficult to reach to fully inspect, assumptions regarding the determination of homogenous groups of suspect material, assumptions regarding attempts to conduct representative sampling, and potential for varying mixtures and layers of material sampled not being representative of all areas of similar material.

9. Full assessments often requires multiple rounds of sampling over a period of time for air, bulk material, surface dust and water. Such comprehensive testing was beyond the scope of RPF services. In addition clearance testing for abatement, as applicable, was based on the visual observations and limited ambient area air testing as indicated in the report and in accordance with applicable state and federal regulations. The potential exists that microscopic surface dust remains with contaminant present even in the event that the clearance testing meets the state and federal requirements. Likewise for building surveys, visual observations are not sufficient alone to detect possible contaminant in settled dust. Unless otherwise specifically indicated in the report, surface dust testing was not included in the scope of the RPF services.

10. For abatement or remediation monitoring services: RPF is not responsible for observations and test for specific periods of work that RPF did not perform full shift monitoring of construction, abatement or remediation activity. In the event that problems occurred or concerns arouse regarding contamination, safety or health hazards during periods RPF was not onsite, RPF is not responsible to provide documentation or assurances regarding conditions, safety, air testing results and other compliance issues. RPF may have provided recommendations to the Client, as needed, pertaining to the Client's Contractor compliance with the technical specifications, schedules, and other project related issues as agreed and based on results of RPF monitoring work. However, actual enforcement, or waiving of, contract provisions and requirements as well as regulatory liabilities shall be the responsibility of Client and Client's Contractor(s). Off-site abatement activities, such as waste transportation and disposal, were not monitored or inspected by RPF.

11. For services limited to clearance testing following abatement or remediation work by other parties: The testing was limited to clearance testing only and as indicated in the report and a site assessment for possible environmental health and safety hazards was not performed as part of the scope of this testing. Client, or Client's abatement contractor as applicable, was responsible for performing visual inspections

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of the work area to determine completeness of work prior to air clearance testing by RPF.

12. For site work, including but not limited to air clearance testing services, in which RPF di site safety and health oversight, abatement design, full shift monitoring of all site activit no warranties, guarantees or certifications of the abatement work conducted by the employers at the job site(s), conditions during the work, or regulatory compliance, with the specific airborne concentrations as indicated by the air clearance test performed by RPF during the conditions present for the clearance testing. Unless otherwise specifically noted in the RPF Report, visual inspections and air clearance testing results apply only to the specific work area and conditions present during the testing. RPF did not perform visual inspections of surfaces not accessible in the work area due to the presence of containment barriers or other obstructions. In these instances, some contamination may be present following RPF clearance testing and such contamination may be exposed during and after removal of the containment barriers or other obstructions following RPF testing services. Client or Client's Contractor is responsible for using appropriate care and inspection to identify potential hazards and to remediate such hazards as necessary to ensure compliance and a safe environment.

13. The survey was limited to the material and/or areas as specifically designated in the report and a site assessment for other possible environmental health and safety hazards or subsurface pollution was not performed as part of the scope of this site inspection. Typically, hazardous building materials such as asbestos, lead paint, PCBs, mercury, refrigerants, hydraulic fluids and other hazardous product and materials may be present in buildings. The survey performed by RPF only addresses the specific items as indicated in the Report.

14. For mold and moisture survey services, RPF services did not include design or remediation of moisture intrusion. Some level of mold will remain at the site regardless of RPF testing and Contractor or Client cleaning efforts. RPF testing associated with mold remediation and assessments is limited and may or may not be representative of other surfaces and locations at the site. Mold growth will occur if moisture intrusion deficiencies have not been fully remedied and if the site or work areas are not maintained in a sufficiently dry state. Porous surfaces in mold contaminated areas which are not removed and disposed of will likely result in future spore release, allergen sources, or mold contamination.

15. Existing reports, drawings, and analytical results provided by the Client to RPF, as applicable, were not verified and, as such, RPF has relied upon the data provided as indicated, and has not conducted an independent evaluation of the reliability of these data.

16. Where sample analyses were conducted by an outside laboratory, RPF has relied upon the data provided, and has not conducted an independent evaluation of the reliability of this data.

17. All hazard communication and notification requirements, as required by U.S. OSHA regulation 29 CFR Part 1926, 29 CFR Part 1910, and other applicable rules and regulations, by and between the Client, general contractors, subcontractors, building occupants, employees and other affected persons were the responsibility of the Client and are not part of the RPF SOW.

18. The applicability of the observations and recommendations presented in this report to other portions of the site was not determined. Many accidents, injuries and exposures and environmental conditions are a result of individual employee/employer actions and behaviors, which will vary from day to day, and with operations being conducted. Changes to the site and work conditions that occur subsequent to the RPF inspection may result in conditions which differ from those present during the survey and presented in the findings of the report.