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May 23, 2005

Ms. Jennifer Rand  
Town of West Tisbury  
State Road PO Box 278  
West Tisbury, MA 02575

Re: Survey Findings  
Former West Tisbury Town Hall  
RPF File 05.1624

Dear Ms. Rand:

On April 15, 2005, RPF Associates, Inc. (RPF) conducted survey at the above referenced site. The survey was performed in areas designated by you for accessible asbestos-containing building material (ACBM) and spot sampling of paint chips for lead based paint (LBP). Subsequent laboratory analysis and review was completed during the period of April 18 through May 6, 2005. The survey was conducted in accordance with current State and federal rules and regulations and our scope of work dated December 28, 2004. Below is a summary of findings, discussion of the results and methodology, and preliminary recommendations for proper management of the ACBM and LBP.

#### Summary of Findings

An RPF inspector surveyed accessible building space within the interior areas of the building in accordance with the initial asbestos inspection requirements prior to renovation or demolition work as stated in the MA Department of Labor and Workforce Development (DLWD) Regulations 453 CMR 6.00 and other applicable federal regulations. Several types of suspect ACBM were observed by RPF, including friable and nonfriable suspect material. Sampling of the suspect material observed was performed to the extent indicated herein and asbestos was detected in the following materials: window glazing, storm window caulk, and flashing compound.

Spot sampling for lead based paint (LBP) was performed for construction informational purposes. Based on the survey of accessible painted surfaces in the affected areas, lead based paint (LBP) was found to be present on interior and exterior building components. Examples of the different types of LBP covered components found garage doors and the window sills.

In addition, based on the RPF visual observations completed during the survey work, polychlorinated biphenyls (PCBs) containing light ballasts, florescent light bulbs and mercury switches are present in the building. Attachment 4 includes the inventory of PCB ballast and florescent light bulbs identified. Attachment 5 includes the inventory of mercury switches identified.

Depending on the extent of renovation and final construction plans, proper abatement and/or management of the materials may be required in accordance with applicable State and federal

regulations. Renovation and demolition plans should be reviewed by a certified industrial hygienist and a licensed project designer for possible asbestos impact issues. Based on the impact assessment and planned usage, technical specifications should be prepared for abatement, as applicable. Design work may also entail further site survey work for confirmation and to address project specifics.

#### Asbestos-Containing Building Material

Fourteen (14) homogeneous groups of accessible suspected asbestos-containing building material were identified in the areas surveyed. Suspect materials were identified based on current industry standards, EPA, and other guideline listings of potential suspect ACBM. A total of thirty-five (35) samples were extracted from the different groups of suspect material in accordance with EPA sampling protocols. Of the samples collected by RPF, asbestos was detected in three (3) groups of suspect ACBM. A list of ACBM identified in the building, EPA category listings, and asbestos content is included as Attachment 1.

A listing of the suspect materials identified that were sampled during this survey, samples extracted, and analytical results are included in Attachment 2

The ACBM identified during this survey consisted of nonfriable material. The nonfriable ACBM was observed to be in fair condition and, left undisturbed and properly managed, is unlikely to cause any major fiber release episodes.

Accessible materials are addressed and various assumptions are provided regarding possible inaccessible or hidden ACBM. It is reasonable to assume that, in buildings of this construction period and based on the findings for accessible space, some inaccessible ACBM may be present within wall, floor and ceiling space. For example, wall chase areas may have ACBM pipe insulation or various types of electric wire wrap. Further destructive testing can be performed when feasible, during specification design work, or in conjunction with demolition activity as requested by you and based on the site conditions.

Materials encountered at the site subsequent to this survey, which are not included on the enclosed listings of suspect material sampled or ACBM inventories, should be assumed to be ACBM until proper testing proves otherwise (for example prior to any disturbance due to maintenance, renovation or demolition activity). Please notify RPF in this event to arrange for proper testing and assessments.

In accordance with current regulatory requirements, ACBM that may be impacted or disturbed (such that asbestos fiber release occurs) by renovation, demolition or other such activity must be removed by qualified, licensed firms. 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. Although regulations for removal of nonfriable ACBM are somewhat less stringent than the requirements for friable ACBM, it should 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.

Please also note that prior to any interior/exterior work involving asbestos disturbance, a MA DLWD notification form must be prepared and submitted to the MA DLWD and the Department of Environmental Protection (DEP) 10-days prior to the start of interior/exterior abatement work. This form should be prepared by trained, accredited personnel and State approval of the plan is required prior to the start of work. Asbestos removal is highly regulated at the State and federal level, and in some cases, at the local level also. RPF recommends that only qualified, trained, and licensed firms, as applicable, be engaged to complete asbestos removal or other abatement activity. It is also recommended that all abatement work is designed (abatement specifications) by accredited personnel and abatement work be monitored by a qualified environmental testing and consulting firm.

All employees and contractors that may access or otherwise disturb areas with suspect ACBM present should be notified of the presence of ACBM and possible hidden ACBM, and the need to use caution when proceeding with work. Appropriate notifications and 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).

For ACBM that remains in a building, an Operations and Maintenance (O&M) Program and Management Plan should be prepared detailing the management and work practices to be implemented to safely occupy the facility with ACBM present. This document should be developed by accredited personnel and implemented in accordance with EPA guidelines and regulatory requirements. The principal objective of the O&M Program is to minimize exposures of all building occupants to asbestos fibers and the Program must be proactive and dynamic. The O&M Program should include, at a minimum, work practices to maintain ACM in good condition; to ensure proper clean-up and plans to abate any existing, damaged ACBM or contamination present; prevent further release of asbestos fibers; and monitor the condition of the ACBM. The Program should be specific to each of the areas and types of ACM present. Other issues that should be included are training requirements, delegation of authority, policy statements, permitting and notification procedures, project planning, surveillance measures, worker protection, and emergency contingency plans.

#### Lead Based Paint Summary of Findings

LBP building components were identified in the areas surveyed. Seven (7) suspect LBP lead based paint (LBP) building components were sampled throughout the building on representative surfaces. The results for the paint chip testing completed during this survey are included in Attachment 3. As you can see in the test results, LBP, as defined by the current Commonwealth of Massachusetts regulations, was identified on window sills and garage doors.

OSHA construction rules do not specify any "safe" or acceptable levels of lead within LBP for the purposes of occupational exposures. Surfaces found to contain 1.0 mg/cm<sup>2</sup> of lead or greater should be managed in accordance with current Commonwealth of Massachusetts rules and guidelines. Finally, State, EPA, and OSHA regulations also cover exposures and waste handling and there are also various guidelines established by HUD and the Center for Disease Control (CDC).

Construction work involving paint found to contain lead must be completed in accordance with U.S. Occupational Safety and Health Administration (OSHA) regulations, not limited to the lead standard, 29 CFR 1926.62. Contractors completing work in areas found to contain lead, or where it is reasonable to assume lead may be present, should be notified of the presence (and potential presence) of lead and proper work protocols should be used.

Proper waste testing (TCLP for lead) should also be completed prior to disposal of any waste generated in accordance with current EPA requirements. Often times it is recommended that pre-demolition TCLP testing be completed such that waste can be segregated as required during demolition activity. Construction/demolition waste that is found to contain greater or equal to 5.0 milligrams per liter (mg/L) by TCLP analysis must be handled and treated as hazardous waste.

#### PCB Light Ballasts and Fluorescent Lamp Inventory

Attachment 4 includes a listing of PCB or assumed PCB ballasts observed by RPF. For this survey, RPF inventoried representative fluorescent lamps and ballasts throughout the building. Visual spot checks for a "No PCBs" label were not conducted at this time as it was not feasible at the time of the survey. Therefore, the potential exists that the units not checked may have PCB ballasts.

During demolition of the lights, additional inspections should be performed as noted above. PCB and non-PCB ballasts should be segregated and packaged for waste disposal in accordance with State and federal requirements. There is a substantial cost difference for disposal of PCB ballasts versus non-PCB ballasts.

PCBs have been shown to cause chronic toxic effects and are a human carcinogen. PCBs are toxic according to the U.S. EPA and are a regulated material. The two primary federal laws that affect the handling of PCBs are the Toxic Substance Control Act and the Superfund Law (CERCLA). Other regulations include various State requirements, Department of Transportation, U.S. OSHA, and the Resource Conservation and Recovery Act. The regulations establish various requirements for the removal, handling, storage and disposal of PCBs.

With regard to light ballasts, approximately half were manufactured prior to 1979 and nearly all pre-1979 ballasts contain PCBs. Ballasts manufactured after July 1, 1978 and that do not contain PCBs are required to be clearly marked "No PCBs". For this inspection, RPF visually inspected representative ballasts throughout the designated areas of the building. Please note that it is possible that post 1979 ballasts may contain some PCBs in the capacitor oils and more information should be requested if needed for applicable State and federal agencies. PCBs may also be present in common household appliances with small capacitors and as dielectric fluids other electric equipment such as transformers, switches and voltage regulators. Documentation of current conditions and in-depth hazard assessments is beyond the scope-of-work for this initial survey.

Please also note that fluorescent and high intensity discharge lamps contain a small quantity of mercury that may pose a hazard to human health or the environment if the materials are not managed

properly. The lamps may also contain lead solder material. Florescent light bulbs were observed in light fixtures on all floors of the structure, for an approximate total of 28.

#### Visual Observations for Mercury Switches

Mercury switches and thermostats were observed in the buildings as listed in Attachment 5. It is possible that additional switches, thermostats or heat detection devices may be encountered during renovation or demolition work and care should be used to properly handle such materials. Documentation of current conditions and in-depth hazard assessments are beyond the scope-of-work for this initial survey

#### Conclusions

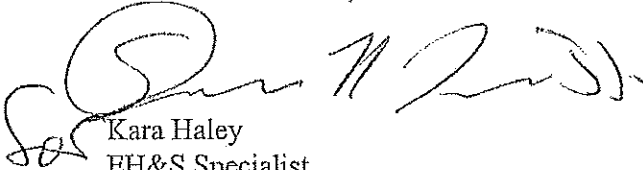
Based on the survey findings, the building was found to contain nonfriable ACBM and LBP. Abatement of the ACBM must be completed prior to renovation or demolition work in accordance with current State and federal requirements. Work impacting LBP, fluorescent light bulbs, mercury (and potential PCB ballasts) should also be performed in accordance with current State and federal standards, including but not limited safe work practices, proper waste packaging, and proper disposal.

Please note that the identified LBP observed by RPF to have damage, such as the window and door components, should be addressed prior to occupancy of the residence by children. In addition, disclosure to the tenants that LBP is present in and on the residence in accordance with the US Environmental Protection Agency (EPA) and the US Department of Housing and Urban Development (HUD) Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as Title X. The act requires that the property owner renting target housing (housing built before 1978) must disclose all known lead-based paint and lead-based hazards in the home and provide any available reports on lead in the residence prior to occupancy by new tenants or at the time of lease renewal with existing tenants. The property owner must give renters the EPA pamphlet *Protect Your Family From Lead in Your Home*. Additionally, the residential property owner must include certain warning language in the lease as well as signed statements from all parties verifying that all requirements were completed. The property owner must retain the signed acknowledgements for three (3) years, as proof of compliance.

Sufficiently in advance of the start of renovation, abatement project design should commence. As part the initial design steps, the project designer should review the planned renovation and construction activity for possible impact on ACBM. Any remaining ACBM after construction should be included in a management plan to ensure safe occupancy of the building with ACBM present. Project design should also address clearance testing that may be prudent for addressing lead.

Documentation of current ACBM conditions and in-depth hazard assessments is beyond the scope-of-work for this initial survey. If you have any questions at this time, or if you would like to discuss the project design process, please call our office.

Sincerely,  
RPF ASSOCIATES, INC.



Kara Haley  
EH&S Specialist  
MA Licensed Inspector: AI 033737

05.1624 W. Tisbury Town Hall Haz Mat Inspection 050605

- Attachment 1 Summary of ACBM Identified
- Attachment 2 ACBM Sampling Results
- Attachment 3 LBP Sampling Results
- Attachment 4 PCB Ballast and Fluorescent Lamp Inventory Listing
- Attachment 5 Mercury Switches Inventory Listing
- Attachment 6 General Information
- Attachment 7 Summary of Methodology and Limitations

## ATTACHMENT 1

# Attachment 1

## Town of West Tisbury

### SUMMARY OF ACCESSIBLE ACBM IDENTIFIED

Building Material	Location	Approximate Quantity	EPA Category	Asbestos Results
Window Glaze	Exterior, Mechanical Room	12 linear feet	Category II Nonfriable	2% Chrysotile
Storm Window Caulk	Exterior, Windows	160 linear feet	Category II Nonfriable	2% Chrysotile
Flashing Compound	Exterior, along chimney, roof	20-25 linear feet (limited access)	Category I Nonfriable	10% Chrysotile

#### Table Notes:

- Attachment 6 of the report contains further information on the EPA category listings. Please note that Category 1 and Category 2 nonfriable ACM are recategorized as friable and/or RACM under certain conditions. Current State asbestos regulations are more strict and comprehensive than the EPA NESHAPs requirements.
- All quantities are approximate only and should be confirmed during abatement project design and abatement bidding.
- Materials listed as assumed ACBM should be properly testing by an accredited inspector prior to disturbance and when such materials become accessible, or shall be handled as ACBM.
- It is likely that some inaccessible ACBM is present. Care should be used when renovating/demolishing inaccessible building space. Further explorative survey work may be necessary during abatement design and in conjunction with demolition.
- Please reference full text of the report for details on the scope of the inspection and limitations.



**ATTACHMENT 2**

**TOWN OF WEST TISBURY**  
**West Tisbury Town Hall**

**SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS**  
**Polarized Light Microscopy – EPA 600/R-93/116 Method**

**Samples Collected: April 15, 2005**

Sample ID	Sample Description	Asbestos Content	Other Content
041505-HG1	Plaster, gray, 1 <sup>st</sup> floor, garage, east wall	No Asbestos detected	3% Hair 97% Non Fibrous
041505-HG1B	Plaster, gray, 1 <sup>st</sup> floor, garage, north east wall	No Asbestos detected	2% Hair 98% Non Fibrous
041505-HG1C	Plaster, gray, 1 <sup>st</sup> floor, garage, south wall	No Asbestos detected	2% Hair 98% Non Fibrous
041505-HG1D	Plaster, gray, 1 <sup>st</sup> floor, garage, north wall	No Asbestos detected	2% Hair 98% Non Fibrous
041505-HG1E	Plaster, gray, 1 <sup>st</sup> floor, garage, west wall	No Asbestos detected	2% Hair 98% Non Fibrous
041505-HG1F	Plaster, gray, 1 <sup>st</sup> floor, stairwell	No Asbestos detected	5% Hair 95% Non Fibrous
041505-HG1G	Plaster, gray, 1 <sup>st</sup> floor, bathroom	No Asbestos detected	2% Hair 98% Non Fibrous
041505-HG2	Vermiculite blown-in insulation, multicolor, 1 <sup>st</sup> floor, garage, west wall	No Asbestos detected	Trace Mineral Wool 100% Non Fibrous
041505-HG2B	Vermiculite blown-in insulation, multicolor, 1 <sup>st</sup> floor, garage, west wall	No Asbestos detected	100% Non Fibrous
041505-HG2C	Vermiculite blown-in insulation, multicolor, 1 <sup>st</sup> floor, stairwell, east wall	No Asbestos detected	100% Non Fibrous
041505-HG3	Gypsum wallboard, white, 1 <sup>st</sup> floor, stairwell, west wall	No Asbestos detected	20% Cellulose 80% Non Fibrous
041505-HG3B	Gypsum wallboard, white, 1 <sup>st</sup> floor, stairwell, west wall	No Asbestos detected	15% Cellulose 85% Non Fibrous
041505-HG3C	Gypsum wallboard, white, 1 <sup>st</sup> floor, stairwell, west wall	No Asbestos detected	20% Cellulose 80% Non Fibrous
041505-HG4	Surface repair compound, white, 1 <sup>st</sup> floor, garage, east wall	No Asbestos detected	100% Non Fibrous

- 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.
- Recent studies have shown that PLM analysis, although the method specified in various regulations for asbestos in bulk samples, may not be sensitive enough to detect asbestos fibers in certain nonfriable material such a floor tile. For confirmation analysis of such nonfriable material found to have trace amounts or no asbestos detected, RPF recommends the use of transmission electron microscopy.
- For samples of friable material found to contain trace amount of asbestos, the EPA requires point count method analysis to confirm the quantity of asbestos detected in the sample or such material should be assumed to be asbestos-containing material. For samples of friable material found to contain 1% up to 10% asbestos the EPA also requires point count method or, as often is the case, such materials is assumed to be asbestos-containing material.

Page 1 of 3 for the above date and location

**TOWN OF WEST TISBURY**  
**West Tisbury Town Hall**

**SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS**  
**Polarized Light Microscopy – EPA 600/R-93/116 Method**

Samples Collected: April 15, 2005

Sample ID	Sample Description	Asbestos Content	Other Content
041505-HG4B	Surface repair compound, white, 1 <sup>st</sup> floor, garage, east wall	No Asbestos detected	100% Non Fibrous
041505-HG5	Fiberboard, brown, 1 <sup>st</sup> floor, stairwell, north wall	No Asbestos detected	98% Cellulose 2% Non Fibrous
041505-HG5B	Fiberboard, brown, 1 <sup>st</sup> floor, garage, north wall	No Asbestos detected	98% Cellulose 2% Non Fibrous
041505-HG6	Homosote board, gray, 2 <sup>nd</sup> floor, access door to room	No Asbestos detected	95% Cellulose 5% Non Fibrous
041505-HG6B	Homosote board, gray, 2 <sup>nd</sup> floor, access door to room	No Asbestos detected	95% Cellulose 5% Non Fibrous
041505-HG7	1x1 ceiling tiles, tan, 2 <sup>nd</sup> floor, open area room	No Asbestos detected	98% Cellulose 2% Non Fibrous
041505-HG7B	1x1 ceiling tiles, tan, 2 <sup>nd</sup> floor, open area room	No Asbestos detected	98% Cellulose 2% Non Fibrous
041505-HG8	Window glaze, gray, exterior, garage window	No Asbestos detected	100% Non Fibrous
041505-HG8B	Window glaze, gray, exterior, stairwell window	No Asbestos detected	100% Non Fibrous
041505-HG9	Window glaze, white, exterior, mechanical room	2% Chrysotile	98% Non Fibrous
041505-HG9B	Window glaze, white, exterior, mechanical room	SFP	SFP
041505-HG10	Storm window caulk, white, exterior, garage window, center	2% Chrysotile	98% Non Fibrous
041505-HG10B	Storm window caulk, white, exterior, stairwell window	SFP	SFP
041505-HG11	Asphalt shingles, black, exterior, entrance overhang	No Asbestos detected	50% Cellulose
041505-HG11B	Asphalt shingles, black, exterior, entrance overhang	No Asbestos detected	60% Cellulose 40% Non Fibrous

- 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.
- Recent studies have shown that PLM analysis, although the method specified in various regulations for asbestos in bulk samples, may not be sensitive enough to detect asbestos fibers in certain nonfriable material such a floor tile. For confirmation analysis of such nonfriable material found to have trace amounts or no asbestos detected, RPF recommends the use of transmission electron microscopy.
- For samples of friable material found to contain trace amount of asbestos, the EPA requires point count method analysis to confirm the quantity of asbestos detected in the sample or such material should be assumed to be asbestos-containing material. For samples of friable material found to contain 1% up to 10% asbestos the EPA also requires point count method or, as often is the case, such materials is assumed to be asbestos-containing material.

**TOWN OF WEST TISBURY**  
**West Tisbury Town Hall**

**SUMMARY OF BULK MATERIAL SAMPLING AND RESULTS**  
**Polarized Light Microscopy – EPA 600/R-93/116 Method**

**Samples Collected: April 15, 2005**

Sample ID	Sample Description	Asbestos Content	Other Content
041505-HG12	Flashing compound, black, exterior, along chimney, near mechanical room	10% Chrysotile	30% Cellulose 60% Non Fibrous
041505-HG12B	Flashing compound, black, exterior, along chimney, near mechanical room	SFP	SFP
041505-HG13	Wire wrap insulation, brown/ black, 1 <sup>st</sup> floor, garage	No Asbestos detected	90% Cellulose 10% Non Fibrous
041505-HG13B	Wire wrap insulation, brown/ black, 1 <sup>st</sup> floor, garage	No Asbestos detected	85% Cellulose 15% Non Fibrous
041505-HG14	Formica with yellow adhesive, white, 2 <sup>nd</sup> floor, open area room, counters	No Asbestos detected	30% Cellulose 70% Non Fibrous
041505-HG14B	Formica with yellow adhesive, white, 2 <sup>nd</sup> floor, open area room, counters	No Asbestos detected	30% Cellulose 70% Non Fibrous

05.1624 West Tisbury Bulk Tbl 041505

- 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.
- Recent studies have shown that PLM analysis, although the method specified in various regulations for asbestos in bulk samples, may not be sensitive enough to detect asbestos fibers in certain nonfriable material such a floor tile. For confirmation analysis of such nonfriable material found to have trace amounts or no asbestos detected, RPF recommends the use of transmission electron microscopy.
- For samples of friable material found to contain trace amount of asbestos, the EPA requires point count method analysis to confirm the quantity of asbestos detected in the sample or such material should be assumed to be asbestos-containing material. For samples of friable material found to contain 1% up to 10% asbestos the EPA also requires point count method or, as often is the case, such materials is assumed to be asbestos-containing material.

**ATTACHMENT 3**

**TOWN OF WEST TISBURY**  
**West Tisbury Town Hall**

**SUMMARY OF PAINT CHIP SAMPLE RESULTS**  
**Lead Paint Chip Analysis: Method SW 846-7420 AA**

**Samples Collected: April 14, 2005**

Sample ID	Description	Percent by Weight
041505-PB1	Paint chip, 1 <sup>st</sup> floor, garage, east wall	0.13
041505-PB2	Paint chip, 1 <sup>st</sup> floor, bathroom, east wall	0.19
041505-PB3	Paint chip, 1 <sup>st</sup> floor, garage, center window sill	0.05
041505-PB4	Paint chip, exterior, garage door	0.87
041505-PB5	Paint chip, exterior, stairwell window sill	2.57
041505-PB6	Paint chip, exterior, mechanical room	0.02
041505-PB7	Paint chip, 1 <sup>st</sup> floor, garage, west wall	0.11

- Note: \* Analysis conducted for lead via NIOSH method 7420, lead in paint by Flame AAS.
- Levels of lead in paint greater than 5% by weight for laboratory analysis are recognized as hazardous by State and HUD authorities for residential situations.
  - Samples analyzed by RPF's Vendor lab ProScience of Woburn, MA, which is AIHA accredited for industrial hygiene samples. Samples collected by Kara Haley, EH&S Specialist of RPF Associates, Inc.

**ATTACHMENT 4**

## ATTACHMENT 4

### Town of West Tisbury

#### SUMMARY OF PCB BALLASTS AND BULBS IDENTIFIED

Location	Approximate Quantity for PCB Ballasts	Approximate Quantity for Bulbs
1 <sup>st</sup> Floor: Main Garage Area	6	24
2 <sup>nd</sup> Floor: Open Area	2	4



**ATTACHMENT 5**

## ATTACHMENT 5

### Town of West Tisbury

#### SUMMARY OF MERCURY SWITCHES IDENTIFIED

Location	Approximate Quantity Observed
1 <sup>st</sup> Floor: Main Garage Area near shop work area	1
2 <sup>nd</sup> Floor: Open Area	1

## **ATTACHMENT 6**

(General summary information only, please reference full text of all applicable local, State and federal regulations and guidance documents)

## GENERAL ASBESTOS INFORMATION

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.

ACBM, which is in good condition, and is not damaged or otherwise disturbed, is not likely release asbestos fibers into the air if it is managed properly. When properly managed, release of asbestos fibers into the air or surrounding areas is prevented or minimized, and the risk of asbestos-related disease can be reduced to a negligible level. However, ACBM can become hazardous when, due to damage, disturbance, or deterioration over time, they release fibers into the air. In the event of fiber release without proper controls, elevated airborne concentrations of asbestos create a potential hazard for any employees and building occupants in the affected areas. All disturbances or fiber releases must be thoroughly cleaned by properly trained personnel.

ACBM is classified by the different regulatory agencies based on friability. Friable ACM, when dry, can be crumbled, pulverized, or reduces to powder by hand pressure. Considering that a primary concern when dealing with ACBM is airborne fibers or the potential for exposure to airborne fibers, friable ACBM is typically considered to present more of a health risk as compared with nonfriable ACBM. Nonfriable ACBM is further grouped by the EPA into Category I and Category II nonfriable ACBM depending on the specific type of ACM. It should be noted that nonfriable ACBM that is rendered friable, or in some cases, subjected to certain activities and forces during work (such as grinding, sanding, sawing, breaking into small pieces, drilling, etc.) are also considered to be friable ACBM or RACM and are regulated as such.

Asbestos is highly regulated at the federal, state, and local levels. To date, the two primary Federal agencies responsible for generating asbestos-related regulations are the U.S. Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). Additionally, regulations regarding asbestos vary from state-to-state and, in some cases, locally. Although several of the federal and State regulations include more stringent requirements, the U.S. Environmental Protection Agency (EPA), 40 CFR Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAPs) categorizes the different types of asbestos-containing material (ACM) for the purposes of the NESHAPs rule.

Category I nonfriable ACM means asbestos containing packings, gaskets, resilient floor covering, and asphalt roofing products containing more than 1% asbestos.

Category II nonfriable ACM means any material, excluding Category I nonfriable ACM, containing more than 1% asbestos that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.

Regulated asbestos-containing material (RACM) includes (a) friable ACM, (b) Category I nonfriable ACM that has become friable, (c) Category I nonfriable ACM that will be or has been subjected to sanding, grinding (breaking into small pieces), cutting, or abrading, or (d) Category II nonfriable ACM that has a high probability of becoming or has become friable or has (of will) become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated under the NESHAPs rule.

In summary, based on current regulatory requirements, ACBM must be identified by having qualified inspectors complete a survey. ACBM that may be impacted or disturbed (such that asbestos fiber release occurs) by renovation, demolition, or other such activity, must be removed by qualified, licensed firms. Work plans, or specifications, for abatement need to be prepared by accredited and licensed, as applicable, project designers. Abatement work must also be properly monitored, inspected, and tested by a qualified consulting/testing firm. ACBM that will not be impacted or disturbed by renovation or demolition activity may be left in place if managed properly and if the materials are maintained in good condition.

The follow is general information only and should not be considered a substitute for actual current regulations.

## **Waste Mercury-Containing Lamps: Management Requirements for Handlers and Transporters**

**Why is mercury an environmental concern?** Mercury is a heavy metal that can accumulate in living tissue and cause adverse health effects. A small amount of mercury is an essential component in fluorescent and HID lamps, but when a lamp is broken or disposed of in a solid waste landfill or incinerator, the mercury can contaminate air, soil, surface water and groundwater. In New Hampshire, mercury has been detected in freshwater fish and statewide fish consumption advisory has been issued by the NH Department of Health and Human Services. For more information on mercury in NH's environment, see DES's *New Hampshire Mercury Reduction Strategy*, published October 1998.

**Are there other contaminants in lamps we should be concerned about?** HID lamps also contain small quantities of lead. Incandescent lamps may contain lead and cadmium.

**Is fluorescent lighting still a good environmental and economic choice?** Yes. The use of energy-efficient lighting reduces electricity needed from power plants, which then reduces harmful emissions of mercury, carbon dioxide and nitrogen oxide. Also, when less energy is demanded, electric utilities need less generating capacity, resulting in more savings for customers.

**NH DES Policy for Handling Mercury Containing Lamps:** Waste mercury-containing lamps generated by businesses, industry and institutions may not be disposed of as a solid waste unless they are below the regulatory limits for mercury when subjected to a toxicity test required by the U.S. Environmental Protection Agency (EPA) and DES. If test results from the Toxicity Characteristic Procedure (TCLP) demonstrate a particular lamp is below the regulatory level of .2 mg/liter, it may legally be disposed as solid waste. However, because these lamps still contain mercury, it is strongly recommended they be recycled since they can contribute mercury to the environment.

Generators of waste are responsible for determining whether their wastes are hazardous and, if so, managing them in accordance with the requirements of the NH Hazardous Waste Rules. These requirements may include use of a hazardous waste manifest, NH registered hazardous waste transporter, and delivery to an authorized hazardous waste facility.

Alternatively, waste mercury-containing lamps may be handled under DES's universal waste policy, adopted October 14, 1998 (also adopted into Federal Universal Waste Rule; 40 CFR 273), which is further described in this fact sheet. NH DES believes that recycling is the preferred option for managing waste mercury-containing lamps and that this policy will promote the recycling and proper management of waste mercury-containing lamps. The State of NH also has various requirements for universal wastes, general status, universal waste consolidation, waste handlers, release prevention, labeling, accumulation limits, training, off-site shipments, exports, waste transportation, and other additional requirements for large quantity handlers.

## **PCBs and Fluorescent Light Ballasts**

Light ballasts are the primary electric components of fluorescent light fixtures. The ballast units are generally composed of a small capacitor, a transformer, and possibly a thermal cutoff switch and/or safety fuse, all of which are surrounded by a tar-like substance enclosed in a metal casing. Prior to 1979, the small capacitor used in light ballasts typically contained *polychlorinated biphenyls (PCBs)* in very high concentrations. Approximately 1-1.5 ounces of PCB fluid were used in the PCB small capacitor.

**What Are PCBs?** PCBs are synthetically manufactured chemicals belonging to a family of organic compounds known as chlorinated hydrocarbons. PCBs were produced in the United States from 1929 to 1977. They are very stable chemicals with a heavy oil-like consistency. Their properties include low water solubility, high boiling point, low

flammability and low electrical conductivity. Because of their chemical properties, most PCBs were used as dielectric fluids in electrical equipment such as transformers, capacitors, switches, and voltage regulators.

**Environmental and Health Effects of PCBs:** When released into the environment, PCBs do not readily biodegrade. Instead, they persist for many years and can be taken up and stored in the fatty tissue of organisms (called bioaccumulation). Further, the concentration of PCBs tends to magnify as simple organisms are consumed by progressively higher organisms up the food chain. As a result, the cumulative quantity of PCBs consumed by man, who is at the end of the food chain, can be significant.

PCBs are widespread in the environment and measurable amounts have been found in soils, water, fish, milk, and human tissue. Exposure to PCBs can be through the lungs (inhalation), the digestive system (ingestion), and the skin (adsorption). Laboratory data show that exposure to PCBs causes cancer in animals and PCBs are considered a human carcinogen. Repeated exposure to PCBs can cause adverse reproductive and developmental effects in animals and even very low levels of exposure can be toxic to fish. Other adverse health affects shown to be caused by PCBs include chloracne (a painful, disfiguring skin illness), nausea, dizziness, eye irritation, bronchitis, liver damage, and digestive problems.

**How are PCBs Regulated?** EPA regulates PCBs through rules, issued pursuant to the Toxic Substances Control Act (TSCA) of 1976. The regulations, Title 40 of the Code of Federal Regulations (CFR) Part 761, control the use, marking, storage, and disposal of PCBs with certain exemptions. Millions of pieces of equipment containing PCBs were manufactured prior to these regulations, many of which are still in service today. Non-leaking PCB small capacitors, including those in fluorescent light ballasts, are exempt from these regulations. However, EPA's PCB Spill Cleanup Policy requirements apply to leaking PCB small capacitors.

PCBs were used in light ballasts manufactured prior to July 1, 1978. Since that time, light ballasts manufactured without PCBs are required to be marked by the manufacturer with the statement "No PCBs." Light ballasts must be assumed to contain PCBs if they are not marked with the "No PCBs" statement.

**Handling and Storage of Light Ballasts:** When removing, handling, and/or storing light ballasts that may contain PCBs, care should always be taken to minimize potential exposure to PCBs. Personal protection should include the use of chemical resistant gloves.

Upon removal of the light ballast, the ballast should be checked to determine if the unit is leaking and if it contains PCBs. If there is visual evidence of tar on the exterior of the metal housing, the unit should be considered a leaker. To determine if the ballast may contain PCBs, it should be searched for the statement "No PCBs." Light ballasts manufactured after 1978 which do not contain PCBs in the capacitor are required to be labeled "No PCBs." If there is no indication of PCB content, the unit should be assumed to contain PCBs.

If non-leaking PCB light ballasts are to be stored on-site for any length of time, the ballasts should be stored in a U.S. Department of Transportation (DOT) approved container (such as an open top steel 55-gallon drum) and labeled with the PCB mark and the out-of-service date. The containers should be placed undercover and on an impervious surface (such as pavement or concrete). PCB light ballasts should be disposed of as soon as possible.

Those light ballasts that are stained or appear to be leaking (tar on the exterior of the unit) should be separated and stored in an approved DOT container with absorbent material (e.g., sawdust, kitty litter, Speedi-Dry). EPA's PCB Spill Cleanup Policy requirements must be complied with in the event of a PCB spill. Contact the State and EPA for further information on PCB spill requirements or on handling, storage, and disposal of leaking light ballasts.

**Disposal of PCB Light Ballasts:** PCB light ballasts should be disposed of at an EPA TSCA-approved incinerator or chemical waste landfill. There are facilities that recycle portions of the PCB light ballast, however, the PCB small capacitor should only be disposed of at an EPA TSCA-approved disposal facility. For each shipment of waste PCB light ballasts, the generator (originator) of the light ballasts should use a manifest, to be signed by the transporter(s) and the storage and/or disposal facility. The generator of the PCB waste should receive a certificate of disposal (destruction) from the disposal facility indicating that the PCB waste was disposed of/destroyed. This paper audit trail record should be kept on-file by the generator.

**ATTACHMENT 7**

## SUMMARY OF METHODOLOGY

### Asbestos

An EPA accredited inspector and state licensed, as applicable, surveyed all accessible building space in the designated structure. Suspect materials were inventoried and categorized into homogeneous groups of materials. To the extent indicated in the report, samples were then extracted from the different groups of homogeneous materials in accordance with applicable State and federal rules and regulations. Samples were placed into containers, labeled, and submitted for analysis to determine asbestos content. Analysis was conducted using polarized light microscopy (PLM). Sampling and analytical protocols used during the survey work were based on the requirements of 40 CFR Part 763. Analysis was completed by a NVLAP accredited and licensed laboratory, as applicable. Although 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 types of materials, such as floor tile. In the event that more definitive results are requested, RPF recommends that confirmation testing be completed using transmission electron microscopy.

Inaccessible areas, such as building space behind walls and floors were not included in the inspection and care should be used when accessing these areas during demolition. In the event that additional suspect materials are encountered, the materials should be properly tested by an accredited inspector. Please also reference the discussions and findings for additional notes on the inspection methods used during this inspection.

### Lead-Based Paint

RPF utilized a Warrington Microlead I X-Ray Fluorescence (XRF) analyzer to determine the presence of LBP. The XRF allows for non-destructive measurements of lead concentrations of in situ dry paint films. The limit of quantitation for this instrument exceeds HUD's requirements for detection of 1.0 mg/cm<sup>2</sup> of lead. Please note that the units of measurements listed on the room-by-room survey notes are in mg/cm<sup>2</sup>, and a reported result of "0" means that no lead was detected by the XRF at the specific test location.

It is recommended that surfaces found to have LBP or trace amount of lead detected with readings of less than 4 mg/cm<sup>2</sup> be confirmed using laboratory analysis, if more definitive results are required. As reviewed with you substrate corrections were conducted in accordance with the XRF manufacturer guidelines; however, 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.

Tests and inspections were not completed on every different surface in every room or area in the building. In addition, please note that dust, air and soil testing were not conducted during this preliminary inspection. In order to conduct thorough hazard assessments for lead exposures, representative surface dust testing and air monitoring throughout the building, LBP testing of all surfaces in the building, and representative soil testing in the exterior areas should be completed. This type of testing and analysis was beyond the scope of services for the initial inspection work.

Other: As discussed in the text of report, other inventories were based on visual observations of accessible, representative areas only.



## SURVEY LIMITATIONS

1. The observations and conclusions presented in the Report were based solely upon the services described herein, and not on scientific tasks or procedures beyond the scope of services as discussed in the proposal and text of the report.
2. The ACBM inspection was limited and included accessible suspect building materials in accordance with current regulatory requirements. Although some assumptions may have been stated regarding the potential presence of inaccessible or hidden ACBM, a full destructive inspection for possible inaccessible suspect ACBM was not conducted. This inspection did not include a hazard assessment survey or testing to determine current airborne or dust concentrations of asbestos in and around the building. The survey was limited to ACBM and LBP, and as indicated herein 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 initial site inspection.
3. The conclusions and recommendations contained in this Report are based on visual observations and testing, limited as indicated in the Report, and were arrived at in accordance with generally accepted standards of industrial hygiene practice and asbestos professionals.
4. Sample analyses were conducted by in-house and/or outside laboratory services, and as such, RPF has relied upon the data provided, and has not conducted an independent evaluation of the reliability of these data.
5. Observations were made of the designated 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 asbestos-containing building material in the designated areas were specifically assessed and visibility was limited, as indicated, due to the presence of solid walls and solid or suspended ceilings throughout the facility. Asbestos may have been used and may be present in areas where detection and assessment is difficult until renovation and/or demolition. Where access to portions of the surveyed area was unavailable or limited, RPF renders no opinion of the condition and assessment of these areas.
6. Interiors of mechanical equipment and other building or process equipment may also have ACBM gaskets or insulation present and were not included in this inspection.
7. 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.

**Approved 6/28/17**  
**TOWN OF WEST TISBURY**  
**SELECTMENS MEETING**  
**Wednesday, June 14, 2017 4:30 p.m. – 5:30 p.m.**

**Present:** Selectmen Skipper Manter, Cynthia Mitchell, Kent Healy, Jennifer Rand

**Also Present:** Bea Phear, Berta Geller, Kate Warner, Heather Hamacek, Joan Ames, Richard Saltzberg

**Minutes:** *C. Mitchell motioned to approve the minutes of 5/23/17 & 5/24/17. K. Healy seconded the motion. The vote on the motion was unanimous in favor for the 24<sup>th</sup> and KH abstained on a favorable vote for the 23<sup>rd</sup>.*

The Board held a moment of silence in honor of the passing of Ronnee Schultz. Skipper noted he was a founding member of the Planning Board.

**Old Courthouse Road Re-Use Committee:** Bea said the Committee had spoken with a wide variety of people and reached the conclusion that the best use for the property was to demolish the building and use the lot for affordable housing. She noted the Committee felt the wood may have some value so that should be taken into account when bidding the work. She said the property was 22,000 square feet, which would allow two bedrooms on site. Kent noted that septic credits could be used to increase the number of bedrooms. Bea said the Committee had spoken with the Dukes County Housing Authority who said it was not as easy to manage a single property versus a cluster of units in the same area but they could do it. After that conversation the Committee thought it probably made the most sense to construct a single family home and sell it with a deed restriction but they would leave that decision to the Affordable Housing Committee. Skipper asked if there was asbestos or lead paint in the building, Kent said yes. Cindy suggested that the demolition and construction be bid together. The Board agreed by consensus that affordable housing was the right decision.

**Complete Streets:** Kate said she had written a letter to the Board discussing the progress of the Complete Streets Committee and had some suggestions of improvements that could be made around town that would make it safer for cyclists and pedestrians. She also drafted a letter she hope the Board would send to MA DOT as a follow up to the request last year to add bike lanes to State Roads. Kent noted that the Complete Streets program funding is not allowed to be used on State Roads, where many of the improvements are needed. Kate said providing a list of priorities to the State may inform how they proceed when they work on their own roads. Skipper said there should be tougher laws for distracted drivers and asked that be added to the letter to MA DOT. Kent said he did not agree with the suggestion to widen the North Tisbury Bridge. He was concerned that the result would be higher speeds in that area of town. Skipper was not in favor of more signs, as suggested in the letter. Jen was asked to send the draft letter with copies to the Police Chief and Highway Superintendent.

**Municipal Hearing Officer:** *C. Mitchell motioned to appoint John Powers as Municipal Hearing Officer for a one year term. K. Healy seconded the motion. The vote on the motion was unanimous in favor.*

**Event Permit & 1 Day Beer & Wine – Moonlight at Misty:** *C. Mitchell motioned to approve the event on 6/23/17 at Misty Meadows. K. Healy seconded the motion. The vote on the motion was unanimous in favor.*

**Finance Committee Year-End Budget Wrap-Up:** Cindy said she thought the letter and accompanying information was excellent work and exactly what the Finance Committee should be doing. The Board expressed their appreciation and support for their work.

**Housing Production Plan (HPP):** *C. Mitchell motioned to approve the HPP. K. Healy seconded the motion. The vote on the motion was unanimous in favor.*

**Town Anniversary Picnic:** The Board thanked everyone, especially Deb Magnuson for making it such a special day.