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Responsive. Reliable. Proven.

October 3, 2019

Mr. Joseph Lucido, LEA
Gloucester Public Schools
Department of Public Works
28 Poplar Street
Gloucester, MA. 01930

Re: Gloucester High School
AHERA 3-year Re-inspection
Mabbett Project No.: 2019043.000.001

Dear Mr. Lucido:

Mabbett & Associates, Inc. (Mabbett®) is pleased to submit the enclosed Asbestos Hazard Emergency Response Act (AHERA) 3-year Re-inspection report for the following school:

Gloucester High School
32 Leslie O Johnson Road
Gloucester, Massachusetts

Re-inspection reports are part of the school’s AHERA Management Plan and should be maintained on file at the School Department’s administrative offices and at the school. The recommended response actions included in the report should be reviewed by the school’s AHERA designated person and implemented as soon as feasible.

The following information is included in this report:

Table 1	Facility and Accreditation Information
Table 2	Recordkeeping Review
Table 3	Re-inspection Results and Recommended Response Actions
Table 4	Evaluation of Resources
Table 5	Summary of ACM Sampling Results
Appendix A	AHERA Schedule of Activities, 2020-2022
Appendix B	Supplemental AHERA Information
Appendix C	Designated Person’s Self Study Guide
Appendix D	6 Month Survey Form
Appendix E	Analytical Results of Bulk Samples

We have also enclosed a copy of the Designated Person’s Self-Study Guide. This guide was developed by the U.S. Environmental Protection Agency (EPA) to help staff appointed to the role of designated person to understand their responsibilities under the EPA AHERA regulations.

If you have any questions regarding this report, please call me at 781-275-6050 ext. 322.

Sincerely,

MABBETT & ASSOCIATES, INC.

BY:

A handwritten signature in black ink, appearing to read 'M. Delaney', with a long horizontal line extending to the right.

Michael F. Delaney
Director, Building Sciences Group
delaney@mabbett.com

Enclosure



AHERA 3-YEAR RE-INSPECTION REPORT

**GLOUCESTER PUBLIC SCHOOLS
GLOUCESTER HIGH SCHOOL
32 LESLIE O JOHNSON ROAD
GLOUCESTER, MASSACHUSETTS**

**Project No. 2019043.000.01
October 3, 2019**

Prepared for:

Gloucester Public Schools
Department of Public Works
28 Poplar Street
Gloucester, Massachusetts 01930

Prepared By:

Mabbett & Associates, Inc.
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Table 1
Facility and Accreditation Information
Gloucester High School, Gloucester, MA
September 3, 2019

School: Gloucester High School

32 Leslie O Johnson Road

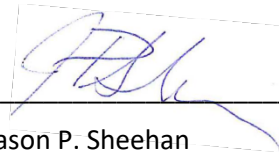
Gloucester, Massachusetts

Principal: Mr. James Cook

LEA Designated Person: Mr. Joseph Lucido

Re-inspection Date: September 3, 2019

Inspector Signature: _____



Accredited Inspector: Jason P. Sheehan

Massachusetts DOS¹ Certification: AI-900685

Certification Expiration: May 8, 2020

Management Planner Signature: _____



Accredited Management Planner: Michael F. Delaney

Massachusetts DOS¹ Certification: AP-000048

Certification Expiration: September 25, 2020

Company: Mabbett & Associates, Inc.

5 Alfred Circle

Bedford, MA 01730

(781) 275-6050

Table 2 Recordkeeping Review Gloucester High School, Gloucester, MA September 3, 2019	
<p>1. The LEA is required to perform periodic surveillance of all ACBM located within the school building(s) at least once every six months. Any changes in the condition of the ACBM must be noted. A written, dated record of the surveillance results must be maintained in the school's AHERA records.</p>	
Periodic inspection records present?	Yes
Comment:	
<p>2. The LEA is required to provide all currently employed custodial and maintenance staff with appropriate asbestos-related training. Evidence of completion of training must be maintained with the school's AHERA records.</p>	
Training records present?	Yes
Comment:	
<p>3. A copy of the school's Asbestos Management Plan must be maintained at each school and be available for inspection by interested parties.</p>	
Management Plan present?	Yes
Comment:	
<p>4. Annual written notification of the availability of the Asbestos Management Plan must be provided to parent, teacher, and employee organizations. A written, dated record of each yearly communication must be maintained with the school's AHERA records.</p>	
Annual communication records present?	Yes
Comment:	
<p>5. The LEA must maintain with the school's AHERA records detailed written records of all removal, operations-and-maintenance, response-action and cleaning activities performed on any ACBM located within the school building(s).</p>	
Abatement records present?	Yes
Comment:	
<p>6. Outside Vendor Awareness Notification</p>	
Awareness notification present?	Yes
Comment:	
<p>7. Asbestos Warn Sigs/Labels (part of O&M for boiler rooms and mechanical spaces)</p>	
Warning signs present?	No
Comment: Affix labels to suspect ACM.	
<p>8. Designated Person ID and Training – either no change or new person since last 3 years.</p>	
Training present?	Yes
Comment:	

Table 3
Re-inspection Results and Recommended Response Actions
Gloucester High School, Gloucester, MA
September 3, 2019

No.	ACBM/Assumed ACBM Description	Functional Space Location	Estimated Quantity	Friability	Assess. Category	Comments	Recommended Response Action	Recommended Completion Date
1	Fitting Insulation / Fittings	Throughout the school behind walls and above hard ceilings	Unknown	F	N/A	The condition of the pipe insulation and fittings could not be determined at this time. Mabbett recommends that all contractors should be informed before any demolition work is performed. There were 40 fittings abated in 2011. The rest of the original material was removed in 1997. There is a letter on file from the architect that all new material is asbestos free.	Inform all contractors before demolishing walls and ceilings to stop if any pipe insulation is encountered. The employer shall attach labels saying asbestos containing materials (ACM); either on the material, in the entryways, of utility areas. Labels will be placed where they will clearly be noticed by employees who are likely to be exposed working in those areas.	February 2020

Table 3
Re-inspection Results and Recommended Response Actions
Gloucester High School, Gloucester, MA
September 3, 2019

No.	ACBM/Assumed ACBM Description	Functional Space Location	Estimated Quantity	Friability	Assess. Category	Comments	Recommended Response Action	Recommended Completion Date
2	Stack/Exhaust Insulation (Added 2019) Not sampled. Assumed ACM.	Boiler Room	100 SF	F	5	Good condition.	The employer shall attach labels saying asbestos containing materials (ACM); either on the material, in the entryways, of utility areas. Labels will be placed where they will clearly be noticed by employees who are likely to be exposed working in those areas.	
3	Black Floor Mastic associated with 12"x12" Floor Tile	1 st , 2 nd , 3 rd floor classrooms and associated Hallways, Including Faculty offices/areas, storage closets and cafeteria. In the 1500s, (vocational building) tile and mastic present in the Carpentry Shop and in the Hall next to Room 1505.	Approx. 150,000 Square feet	NF	N/A	In 2017 tile and mastic was abated from room 1407. Black floor tile mastic sampled and confirmed ACM September 2019.	Maintain asbestos-containing flooring in accordance with EPA and OSHA guidelines. Use low speed buffers (<300 rpm). Maintain good wax coatings on flooring. Use low abrasion buffing pads. Do not sand, drill, cut, or otherwise disturb asbestos-containing flooring.	
4	Fire Curtain	Auditorium	NA	NF	N/A	Good Condition	Maintain intact and in undamaged condition as part of an asbestos O&M program.	February 2020

Table 3 Re-inspection Results and Recommended Response Actions Gloucester High School, Gloucester, MA September 3, 2019								
No.	ACBM/Assumed ACBM Description	Functional Space Location	Estimated Quantity	Friability	Assess. Category	Comments	Recommended Response Action	Recommended Completion Date
5	Boilers	Boiler Room	NA	NF	N/A	Good Condition	The employer shall attach labels saying asbestos containing materials (ACM); either on the material, in the entryways, of utility areas. Labels will be placed where they will clearly be noticed by employees who are likely to be exposed working in those areas.	February 2020
6	Fire Door	Boiler Room / Crawl Space	NA	NF	N/A	N/A	The employer shall attach labels saying asbestos containing materials (ACM); either on the material, in the entryways, of utility areas. Labels will be placed where they will clearly be noticed by employees who are likely to be exposed working in those areas.	February 2020

AHERA ACBM assessment categories used in Table 3:

- 1 = Damaged or significantly damaged thermal system insulation (TSI) ACBM
- 2 = Damaged friable surfacing ACBM
- 3 = Significantly damaged friable surfacing ACBM
- 4 = Damaged or significantly damaged friable miscellaneous ACBM
- 5 = ACBM with potential for damage
- 6 = ACBM with potential for significant damage
- 7 = Any remaining friable ACBM or friable suspected ACBM
- X = Not categorized (material is non-ACBM or non-friable surfacing or miscellaneous material)
- N/A = Not applicable (material removed or could not be located)
- F = Friable
- NF = Non-Friable

Table 4
Evaluation of Resources
Gloucester High School, Gloucester, MA
September 3, 2019

A. Response Action Costs:

The following are order-of-magnitude budget costs for implementation of asbestos abatement response action recommendations as a result of the 2019 Re-inspection.

Asbestos Design:	\$0
Air Monitoring	\$0
ACM Repair/Removal	\$0

B. Equipment Costs (Optional):

Equipment to perform O&M activities will only be needed if the employees have completed the 16-hour O&M training and are in the respiratory protection program. The trained employees can perform very small projects that will disturb asbestos. Specifically, O&M-trained employees can do work that involves no more than 3 linear feet or 3 square feet, and the asbestos removed must be confined to one standard asbestos waste bag. The equipment needed with estimated cost of items is as follows:

1)	HEPA filtered vacuum	\$1,000
2)	HEPA vacuum disposable bags – 5/pkg.	\$15
3)	6-mil plastic waste disposal bags – 25/cs.	\$20
4)	6-mil plastic sheeting - roll of 12' x 100'	\$35
5)	Asbestos warning sign – 20/pkg.	\$5
6)	Duct tape – 1 roll	\$10
7)	Garden spray bottle	\$30
8)	Wetting agent – 1 gallon	\$30
9)	Half-mask-dual-cartridge respirator	\$20
10)	HEPA filtered cartridges for respirators-6/pkg.	\$30
11)	Tyvek disposable suits – 25/cs.	\$100

	Total	\$1,295
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C. Asbestos Training Costs

2-hour awareness training is required for the Designated Person and all maintenance personnel. The estimated cost for course attendance per person is \$100.

The Designated Person can also receive additional training by reviewing the EPA's Designated Person Self Study Guide (a copy is enclosed).

D. Ongoing Management Costs:

The following are approximate costs for on-going management of the identified ACBM:

• Labeling	\$500
• 6-Month Surveillance	\$1,500
• 3-Year Re-inspection	\$3,000/3-Year Period

Table 5 Summary of ACM Sampling Results Gloucester High School, Gloucester, MA September 3, 2019		
Sample No.	Material Description/Location	Result
01A	12" X 12" Blue Floor Tile, Room 1409	No Asbestos Detected
01B	12" X 12" Blue Floor Tile, Room 1409	No Asbestos Detected
02A	Black Floor Tile Mastic, Room 1409	5% Chrysotile
02B	Black Floor Tile Mastic, Room 1409	NA/PS

NA/PS = Not Analyzed, Positive Stop

APPENDIX A

AHERA Schedule of Activities, 2020 - 2022

Appendix A AHERA Schedule of Activities, 2020 - 2022 Gloucester High School, Gloucester, MA	
Date (not later than)	Action
March 3, 2020	6-month periodic surveillance to be performed
September 1, 2020	Issue annual written notification of availability of the Management Plan
September 3, 2020	6-month periodic surveillance to be performed
March 3, 2021	6-month periodic surveillance to be performed
September 1, 2021	Issue annual written notification of availability of the Management Plan
September 3, 2021	6-month periodic surveillance to be performed
March 3, 2022	6-month periodic surveillance to be performed
September 1, 2022	Issue annual written notification of availability of the Management Plan
September 3, 2022	3-year Re-inspection to be performed

APPENDIX B

Supplemental AHERA Information

Appendix B.
Supplemental AHERA Information for the Education Agency

The asbestos re-inspection that was recently completed in your school building(s) by Mabbett & Associates, Inc. (Mabbett®) was performed to comply with the AHERA regulation. It will be necessary to repeat the re-inspection(s) every three years until all known asbestos has been removed from the building or until the building is no longer used as a school.

AHERA stands for the Asbestos Hazard Emergency Response Act. This Act was signed into law on October 22, 1986 by President Reagan. It established the framework for a regulation which requires, among other things, that elementary and secondary schools identify asbestos containing materials in school buildings, institute programs aimed at minimizing the risk of asbestos exposure in those buildings, and re-inspect those materials every 3 years.

Asbestos is a naturally occurring fibrous mineral used in many building materials, primarily for fireproofing, thermal system insulation, sound insulation, flooring, and decoration. Materials that contain more than one percent asbestos are referred to as asbestos containing materials (Massachusetts regulations include materials that have one percent or greater asbestos). Inhalation of airborne asbestos fibers, which can be released by damaged or deteriorated asbestos containing materials in school buildings, has been shown to pose a health risk to building occupants.

The results of the most recent 3 year re-inspection have been presented in a written report. The report contains important information on the condition of all known asbestos containing materials in the school and presents a list of recommendations, referred to as Response Actions, that the Local Education Agency should implement to ensure that asbestos containing materials do not present a health risk. A Local Education Agency is an agency at the local level that exists primarily to operate schools or to contract for educational services for elementary and secondary public and non-profit private schools.

AHERA requires each Education Agency to designate a person, referred to as the AHERA Designated Person, to ensure that the AHERA requirements are properly implemented. The Education Agency is required to provide the AHERA Designated Person with adequate training to perform the duties required by AHERA. One of the responsibilities of the AHERA Designated Person is to review the re-inspection findings and implement the Response Actions included in the findings. The name of the Designated Person is indicated in Table 1 of Mabbett's re-inspection report. Response Action recommendations and recommended completion dates are presented in Table 3 of Mabbett's re-inspection report.

During the initial AHERA inspections, many of the suspect materials in schools were assumed to be asbestos containing building materials, rather than sampling the materials to determine the asbestos content. In some instances, it may be advantageous for the Local Education Agency to sample these assumed asbestos containing to determine their asbestos content. For example, during the initial AHERA inspections, wall plaster was frequently assumed to be an asbestos containing material, even though this material often times does not contain asbestos. If wall plaster is determined to be damaged during a re-inspection, response action consisting of removal or repair must be implemented. Sampling of the material may reveal that it does not contain asbestos, significantly reducing the cost of removal or repair. Of course, if the material is determined contain asbestos then the response action must still be completed.

The AHERA Designated Person is responsible for ensuring that the various AHERA related documents or records are maintained on file as part of each school's Management Plan. A Management Plan is a document(s) that each Education Agency is required to prepare under AHERA regulations. It describes all activities planned and undertaken by a school to comply with AHERA regulations, such as building inspections to identify asbestos containing materials, response actions, and operations and maintenance programs to minimize the risk of exposure to asbestos in school buildings. In practice, each school's Management Plan should consist of various documents, reports, letters, etc. organized into files that are kept at the Local Education Agency administrative offices with duplicates kept at each school building. Mabbett inspectors perform a limited review of each school's records during each re-inspection. The results of the review are presented in Table 2 of Mabbett's re-inspection report.

The following pages of this Appendix are copied from the United States Environmental Protection Agency Document "A Guide To Performing Re-inspections Under The Asbestos Hazard Emergency Response Act (AHERA)" dated February 1992. The information reproduced and included in this Appendix includes a sample re-inspection notification letter for parents and staff, and a glossary of terms.

GLOSSARY OF TERMS

ACBM	Asbestos-containing building material. Which includes surfacing material, thermal system insulation, or miscellaneous material that is found in or on interior structural members or other parts of a building.
ACBM Condition	Good: No visible damage or deterioration, or showing only very limited damage or deterioration. Damaged: Physical injury or deterioration such that the internal structure of the material is inadequate, material which has delaminated such that its bond to the substrate is inadequate, or which lacks fiber cohesion or adhesion properties for any other reason. Thermal system insulation (TSI) is considered damaged when it is lacking part or all of its covering. Such damage may be shown by the separation of ACM into layers; flaking, blistering, or crumbling; water damage or stains; scrapes, mars or gouges; exposed TSI beneath its covering. Significantly Damaged: Damage that is extensive and severe.
Administrator (EPA)	The person appointed by the President to run the EPA.
AHERA	The Asbestos Hazard Emergency Response Act. This Act was signed into law on October 22, 1986 by President Reagan. It established the framework for a regulation which requires, among other things, that elementary and secondary schools identify asbestos-containing materials in school buildings, institute programs aimed at minimizing the risk of asbestos exposure in those buildings, and re-inspect those materials at least every 3 years.
AHERA/regulation/rule	40 CFR 763, Asbestos-Containing Materials in Schools: Final Rule and Notice, U.S. Environmental Protection Agency, February, 1987.
AHERA 1-7 Categories	Seven categories defined in the AHERA regulations, one of which must be assigned to each friable surfacing and miscellaneous ACBM and each asbestos-containing TSI during an inspection or re-inspection. <ol style="list-style-type: none">1. Damaged or significantly damaged TSI ACBM.2. Damaged friable surfacing ACBM.3. Significantly damaged friable surfacing ACBM.4. Damaged or significantly damaged friable miscellaneous ACBM.5. ACBM with potential for damage.6. ACBM with potential for significant damage.7. Any remaining friable ACBM or friable suspected ACBM.
AHERA Designated Person/Designated Person	Person designated by the Local Education Agency to ensure that the AHERA requirements are properly implemented.

Asbestos	Naturally-occurring fibrous mineral used in many building materials, primarily for fireproofing, thermal system insulation, sound insulation, and decoration.
Asbestos-containing	Any material, when referring to school buildings, which contains more than one percent asbestos.
Assessment	Evaluation of the physical condition and potential for damage of all friable ACBM and asbestos-containing thermal system insulation. AHERA requires classification of each ACBM assessed into one of seven categories based on material type and damage/potential for damage.
Assumed ACBM	Suspect building material that has not been sampled and analyzed for asbestos content and must, therefore, be treated as an ACBM by the LEA.
Bulk Sample	A small portion (usually about thumbnail size) of a suspect asbestos-containing building material collected by the inspector for laboratory analysis to determine asbestos content.
Completed Reinspection	The entire process of the visual examination and assessment of known and assumed ACBM in a school building; recommended response actions by the management planner; and submission of re-inspection findings and recommendations to the designated person. Re-inspections are required by AHERA every 3 years after management plan implementation.
Current Accreditation	Having successfully completed an EPA-approved accreditation or refresher course within 1 year of the re-inspection (for inspectors) or the management plan review (for management planners).
Encapsulation	Treatment of asbestos-containing material with a liquid that covers the surface with a protective coating or embeds fibers in an adhesive matrix to prevent the release of asbestos fibers.
Enclosure	An airtight, impermeable, permanent barrier around asbestos-containing material to prevent the release of fibers.
EPA	U.S. Environmental Protection Agency.
Evaluation Study	An EPA report entitled Evaluation of the Asbestos Hazard Emergency Response Act (AHERA).
Exclusion	One of several situations which permit the LEA to delete one or more of the items required by AHERA. For example, records of previous sample collection and analysis may be used by the accredited inspector in lieu of AHERA bulk sampling.
Exterior Areas	Subdivision of areas of a building with one or more walls open to the outside, such as covered walkways or porticos.

Form	<p>Any document the inspector uses to record information for the re-inspection, or for inspection of previously unidentified materials. Two forms were developed for this re-inspection guide:</p> <p>Sample Re-inspection Form 1. Original AHERA Inspection Information Abstracted from the Management Plan.</p> <p>Sample Re-inspection Form 2. Re-inspection of ACBM: Findings and Management Planner Recommendations.</p>
Friable	<p>When referring to a school building, material that, when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. Includes previously non-friable material after it becomes damaged to the extent that, when dry, it may be crumbled, pulverized, or reduced to powder by hand pressure.</p>
Functional Space	<p>Under AHERA, a room, group of rooms, or homogeneous area designated by a person accredited to prepare management plans, design abatement projects, or conduct response actions.</p>
HEPA	<p>High Efficiency Particulate Air. A special type of filter used in equipment for removing asbestos fibers, e.g., vacuums, air filtration devices.</p>
Homogeneous Sampling Area	<p>In accordance with AHERA definitions, an area of surfacing material, TSI, or miscellaneous material that is uniform in color and texture.</p>
HVAC	<p>Heating, Ventilation and Air-Conditioning systems in a building.</p>
Identified Material	<p>Any AHERA-defined suspect material found during the original AHERA inspection that was also recorded in the management plan for the building.</p>
Local Education Agency	<p>An educational agency at the local level that exists primarily to operate schools or to contract for educational services for elementary and secondary public and non-profit private schools. For non-profit private schools, this includes the building owner.</p>
Management Plan	<p>A document that each Local Education Agency is required to prepare under AHERA regulations. It describes all activities planned and undertaken by a school to comply with AHERA regulations, such as building inspections to identify asbestos-containing materials, response actions, and operations and maintenance programs to minimize the risk of exposure to asbestos in school buildings.</p>
Material Category	<p>Broad classification of suspect materials into TSI, surfacing material, and miscellaneous material.</p>
Miscellaneous Material	<p>Interior building material on structural components, such as floor or ceiling tiles. Does not include TSI or surfacing material.</p>

NESHAP	National Emission Standards for Hazardous Air Pollutants, EPA rules under the Clean Air Act.
Non-friable	Material that, when dry, cannot be crumbled, pulverized, or reduced to powder by hand pressure.
Operations and Maintenance Program (O&M)	Program of work practices to maintain friable ACBM in good condition, ensure cleanup of asbestos fibers previously released, and prevent future release by minimizing and controlling friable ACBM disturbance or damage.
Original AHERA Inspection/Original Inspection	Examination of school buildings arranged by Local Education Agency, pursuant to AHERA, to initially identify asbestos containing materials, evaluate the condition of those materials, and take samples of materials suspected to contain asbestos. Inspections are performed by inspectors accredited by the EPA or by EPA-approved State accreditation programs.
Periodic Surveillance	A visual examination for any change in material condition of ACBM and assumed ACBM in a school building. AHERA requires a periodic surveillance at least once every 6 months.
Previously Unidentified Material	Any AHERA-defined suspect material present in a building at the time of the original AHERA inspection that is not reported in the management plan.
Recorded Location	An area in which a suspect material was present during the inspection, and which is indicated in the management plan as having the material present.
Reinspection	The re-examination, by an accredited inspector, of a school building for which an original AHERA inspection was previously performed, including a re-evaluation and response action recommendations by an accredited management planner. Re-inspection of school buildings containing ACBM is required by AHERA regulations at least once every 3 years.
Removal	Taking out or stripping ACBM from an area, a functional space, or a homogeneous area.
Repair	Procedures used to patch or cover damaged asbestos-containing materials, other than enclosure or encapsulation. Examples include covering the damage with plastic sheeting, duct tape, or plaster.
Resilient Sheeting Flooring/Linoleum	A type of floor covering which is preformed in long sheets. Generally, the sheets are unrolled and secured to the floor with an adhesive. These commonly have a vinyl-based upper surface. The backing may contain asbestos.
Response Actions	Methods, including removal, encapsulation, enclosure, repair, and operations and maintenance, that protect human health and the environment from friable ACBM.

Room/Area	A well-defined space within a building, generally a distinct room, but also a hall, crawlspace, or other distinct space. This term may refer to the entire homogeneous sampling area or to a functional space but is generally a subset of these.
School Building	Any structure essential to the operation of a school and under the authority of the LEA, including classrooms, student housing, athletic facilities, administrative areas, garages, and maintenance areas. Several buildings may be present at one school.
Surfacing Material	Material sprayed or troweled onto structural members (beams, columns, or decking) for fire protection; or on ceilings or walls for fireproofing, acoustical or decorative purposes. Includes fireproofing, textured plaster, and other textured wall and ceiling surfaces.
Suspect Material	Building material suspected to contain asbestos because of past practices in its manufacture and use. Includes surfacing material, gypsum wallboard (also called sheetrock or drywall), floor tile, ceiling tile, thermal system insulation, and miscellaneous other materials. Suspect materials are classified as ACBM or non-ACBM by analyzing bulk samples to determine asbestos content.
Total Amount	Estimated amount (in square or linear feet) of suspect material in a building(s) at the time of the original AHERA inspection.
TSI	Thermal System Insulation. Material in a school building applied to pipes, fittings, boilers, breeching, tanks, ducts or other interior structural components to prevent heat loss or gain, or water condensation, or for other purposes.
Underestimated Quantity	The difference between the total amount of a suspect material found during the Evaluation Study and the amount of the same material recorded in the management plan, when the latter quantity is less than 80 percent of the former.
Vibration Dampening Cloth (VDC)	Cloth commonly found on ductwork where duct size changes used to reduce noise.
Wallboard	Generic term for any wall surface installed as sheets, rather than applied wet. Includes gypsum wallboard (also called sheetrock or drywall), Transite panels, etc.

APPENDIX C

Designated Person's Self Study Guide

APPENDIX D

6 Month Survey Forms

APPENDIX E

Analytical Results of Bulk Samples