

March 29, 2006

Mr. Matt Walsh, Community Development Project Manager
City of Concord
41 Green Street
Concord, New Hampshire 03301

Re: Hazardous Building Materials Inspection – Crescent and East Street Buildings
SLGL File Number 16162

Dear Mr. Walsh:

EXECUTIVE SUMMARY

On February 10, 2006, a Hazardous Building Materials Inspection was performed by *The Scott Lawson Group, Ltd. (SLGL)* at the 4 Crescent Street, 0 East Street (Meter House), Storage Shed in sub-station, and Effluent Treatment Building located next to the former Tannery in Penacook, New Hampshire. Included with this report is a summary of our findings, copies of the analytical reports and chain-of-custody documentation, cost estimates for the abatement of identified hazardous materials and our recommendations for the proper removal and disposal of hazardous building materials. *SLGL's* Scope-of-Work included a Hazardous Building Assessment of four (4) buildings and the two (2) effluent tanks. *SLGL* was not responsible for sub-surface sampling and/or the sampling of the debris pile located next to the 4 Crescent Street Building.

Based on the analytical results for the bulk samples collected and our visual observations, ACM and hazardous materials are present at/within these two (2) properties. Fluorescent light fixtures and Mercury thermometers were observed during the site inspection as well as several labeled and unlabeled chemical containers. Lead-Based Paint (LBP) was not identified from interior and exterior surfaces of both buildings. As part of the survey, *SLGL* accessed the wastewater treatment sedimentation chamber and collected representative samples of the residual material for waste characterization; the sludge material within the sedimentation chamber will require proper remediation and disposal.

ACM must be abated in accordance with State of New Hampshire and Federal requirements prior to activities such as renovation or demolition, which may directly disturb these materials. Fluorescent light tubes and any PCB-containing ballasts must be properly collected, packaged, and disposed of according to State of New Hampshire and Federal requirements. Chemical containers must be consolidated and characterized for proper disposal or recycling. Cost estimates begin on page 4, with recommendations at page 6.

DISCUSSION

Mr. Brian K. Cournoyer, CSP and Senior Project Manager and Mr. Thomas K. O'Neil, Licensed State of New Hampshire Asbestos Inspector and Health and Safety Professional conducted this survey. The survey was conducted to determine the presence of Asbestos-Containing Materials (ACM) and evaluate for the presence of potential hazardous materials as part of the proposed demolition scheduled for the 4 Crescent Street, 0 East Street (Meter House), Storage Shed in sub-station, and Effluent Treatment Building. The following sections describe in greater details the results of this survey.

Asbestos-Containing Materials:

Each room and/or area of the 4 Crescent Street, 0 East Street (Meter House), Storage Shed in sub-station, and Effluent Treatment Building was inspected for the presence of suspect ACM. (We should note that this survey was conducted while 4 Crescent Street Building was occupied - somewhat limiting access and destructive sampling to evaluate areas where materials could be behind walls; however, due to the recent date of completed renovations to the building *SLGL* feels that all ACM has been identified). The 0 East Street Building (Meter House), Storage Shed in sub-station, and Effluent Treatment Building was unoccupied and destructive sampling was conducted. A walkthrough was first conducted in each area with the suspect materials being categorized into homogeneous groups, as needed. The samples of suspect materials were collected and returned to our laboratory for analysis for possible Asbestos content utilizing the EPA Method 600/R-93/116, July 1993, which incorporates the use of Polarized Light Microscopy (PLM).

SLGL's laboratory is a National Voluntary Accreditation Program (NVLAP)-accredited laboratory (No. 101228-1), for the analysis of bulk Asbestos samples by PLM. According to Federal and State regulations, materials containing greater than one percent (> 1%) Asbestos by dry weight is considered to be Asbestos-containing. Thirty-one (31) samples were collected from the buildings during the survey; Asbestos was detected in four (4) of the fourteen (14) homogeneous groups of materials identified and sampled. **There was no ACM detected in the 0 East Street (Meter House) and Storage Shed in sub-station.**

The following table lists the location and approximate quantity of the ACM identified. Note: the quantities are estimates based on *SLGL's* observations on the day of the survey.

- The quantities will require confirmation once the 4 Crescent Street building has been vacated.

Table I Asbestos-Containing Materials

ACM Location	ACM	Approximate Quantity
4 Crescent Street Building, Main Roof	Rolled Roofing	2,000 ft ²
Effluent Treatment Building, Main Door	Caulking	20 lf
Effluent Treatment Building, Walls	Brown Glue	900 ft ²
Effluent Treatment Building, Inside Door Hatch on Roof	Black Caulking	15 lf

Note: ft²- Foot square, lf- Linear feet

Suspect Lead-Based Paint (LBP):

During the inspection, *SLGL* observed painted surfaces within the four (4) buildings. Samples collected from the exterior/interior of the buildings surveyed did not reveal the presence of LBP (i.e., Lead concentrations were below regulatory limits).

PCBs and Fluorescent Lights:

PCBs were banned in 1979 and were not to be used after 1980. No testing was performed for PCBs during the survey, however, considering the general age of the buildings, PCBs may still be found in some of the ballasts in the fluorescent light fixtures. Ballasts that are not specifically stamped "Non-PCB" must be treated as PCB-containing. The fluorescent light tubes themselves may contain small amounts of Mercury vapor or other hazardous components and should be handled or disposed of properly. The State of New Hampshire allows the recycling of unbroken tubes at permitted facilities. The following table lists the approximate number of light tubes and ballasts in each of the buildings surveyed.

Table II – Fluorescent Light Fixtures

Location	Light Ballasts	Fluorescent Light Tubes	General Size of Tubes
4 Crescent Street (Main Office Area and Garage)	18	36	4'
Effluent Treatment Building	3	6	4'
Meter House	6	6	4'

Mercury:

Two (2) Mercury-containing thermostats were observed during the survey - one (1) located in the Effluent Treatment Building and the other in the 4 Crescent Street location. These items should be collected and disposed of properly prior to demolition and renovation activities taking place. Please note that fluorescent light tubes contain small quantities of Mercury that require their proper collection, packaging, and disposal prior to renovation and demolition activities.

Miscellaneous Materials:

Evaluation of the Wastewater Effluent Treatment Building revealed the presence of nine (9) 35-gallon drums of corrosive materials, three (3) 55-gallon drums of Ferric chloride, and two (2) 55-gallon drums with unknown contents, and an approximate 10,000-gallon (approximately 45 tons) AST was observed. (The contents of the tank were observed to be a solid fill material.) Adjacent to the wastewater treatment building is the treatment building Sedimentation Chamber, that was observed to have a sludge material of approximately two feet in depth along with an approximate 1 foot of liquid on the surface. *SLGL* estimates approximately 27,000 gallons (100 tons) of material remain within the Chamber (approximately 9,000 gallons of water and 18,000 gallons of sludge/sediment material). One (1) sample was collected from of the AST contents, while two (2) samples were collected from within the Sedimentation Chamber. The three (3) samples were analyzed for Toxicity Characteristic Leachate Procedure (TCLP) metals (RCRA 8), Semi-Volatile Organics, PAHs, and analyzed to determine the presence of Chrome III (trivalent) and Chrome VI (hexavalent) fractions. In addition, the samples collected from within the Sedimentation Chamber were analyzed for the presence of Diesel and Gasoline Range Organics (TPH).

Review of the sample results did not indicate any levels of the analytes to exceed the TCLP requirements to classify the sludge/sediment material and tank contents as a hazardous waste. The samples collected from within the sedimentation chamber did however reveal concentrations of Diesel and Gasoline Range organics (TPH). In addition, miscellaneous materials such as various cleaners and paints were observed from within the 4 Crescent Street Garage that will need to be properly disposed of or recycled.