

PROJECT SPECIFICATIONS

ASBESTOS ABATEMENT
REMEDIATION PROJECT

Worcester Public Schools

Millbury Head Start

389 Millbury Street, Worcester, MA

DESIGNER:

ATLAS Technical Consultants LLC
73 William Franks Drive
West Springfield, MA 01089
(413) 781-0070

November 6, 2026

SECTION 020800

ASBESTOS ABATEMENT

PART I - GENERAL

1.1 RELATED DOCUMENTS

A. The Owner shall not incur any additional costs due to negligence or regulatory requirements imposed upon this project due to the Asbestos Abatement Contractor failing to abide by the requirements of the specifications and applicable regulations.

1.2 SUMMARY

A. Provide all labor, materials, and equipment necessary to complete work of this Section, including but not limited to the following:

1. All Asbestos Abatement work referenced herein shall be performed by a Massachusetts licensed Asbestos Abatement Contractor in accordance with Massachusetts Department of Labor Standards 454 CMR 28.0 Regulations.
2. Asbestos Abatement Contractor performing the abatement work of this section ("Asbestos Abatement Contractor") shall be an Asbestos Abatement Contractor licensed to perform asbestos operations in the State of Massachusetts. Asbestos Abatement Contractor shall submit license number and proof of licensure.

1.3 DEFINITIONS

A. Site: Refers to the Millbury Head Start located at 389 Millbury Street, Worcester, Massachusetts as outlined by specifications and drawings herein.

B. Owner: Refers to the Worcester Public Schools and their designated, authorized personnel.

C. Consultant: Refers to ATLAS Technical Consultant, LLC (ATLAS), 73 William Franks Drive, West Springfield, Massachusetts and their designated, authorized personnel.

D. Asbestos Abatement Contractor: Refers to the Contractor who has been awarded the Contract for performance of asbestos abatement work as outlined by this Section.

E. Asbestos Project Designer: The MADLS certified Asbestos Project Designer for this project is Mr. Edward Kolodziej (#AD074321), ATLAS Technical Consultant, LLC.

1.4 DESCRIPTION OF WORK

A. Work: This section details all areas where asbestos abatement work is to be performed and lists areas requiring special protection during the abatement work. The Asbestos Abatement Contractor shall furnish all labor, materials, services, training, insurance, and equipment as needed to complete removal of asbestos-containing and asbestos-contaminated materials located as indicated below. The Asbestos Abatement Contractor shall follow all Federal, State and local ordinances, regulations and rules pertaining to asbestos, including its abatement, storage, transportation and disposal.

B. The Asbestos Abatement Contractor shall be responsible for verifying all quantity estimates in preparation of their bids, including the location and conditions of all asbestos-containing materials to be abated under this contract. No additional compensation and/or contract time shall be granted to the Asbestos Abatement Contractor for failure to perform this requirement and no compensation shall be granted for variations in the quantities presented herein.

C. The Asbestos Abatement Contractor shall begin work at a mutually agreed upon time. Contractor shall work in harmony with all other trades performing separate contract work in the building.

D. The following Scope of Work and Requirements shall be applicable for asbestos abatement work at the Millbury Head Start. If a specific note for an abatement procedure or requirement is not mentioned herein, the Asbestos Abatement Contractor shall perform the removal of such material in accordance with local,

state and federal regulations. The Asbestos Abatement Contractor shall also coordinate all work with the General Contractor, as applicable.

1. All Asbestos Abatement work shall take place in accordance with the provisions outlined herein as well as current local, state and federal regulations. No additional compensation shall be granted to the Asbestos Abatement Contractor for compliance with applicable laws when performing the abatement work at the site. This shall include any regulatory requirements that mandate additional or more restrictive containment and abatement procedures than what has been presented herein. It shall be the Asbestos Abatement Contractor's responsibility to comply with such regulations as well as any other additional requirements outlined by this Section.

2. Coordination shall exist between the abatement under this Section and the disconnection of existing electrical, plumbing or fire suppression equipment within the building by the Owner.

4. All removal procedures shall take place within a contained work area with a decontamination unit under negative pressure (unless otherwise approved by the Consultant).

5. The following requirements shall be applicable for asbestos abatement activities at the site:
   a. Perform abatement of asbestos containing materials in a contained work area using negative air filtration techniques, decontamination unit, critical barriers.
   b. Establish a decontamination unit in accordance with applicable regulations.
   c. Workers shall wear disposable protective suits and respiratory protection for asbestos abatement activities or disturbance of asbestos-containing materials.
   d. Decontamination/Remediation Activities:
      i. Contractor shall follow the Non-Traditional Work Plan approved by the MassDEP for this project (See Attachment B).
   e. Pipe & Fitting Insulation:
      i. Perform abatement of asbestos containing pipe & fitting insulation using negative air filtration techniques (estimated 1-NAFU), decontamination chambers, critical barriers, full 2 layer plastic containment (2-layers of 4-mil poly on walls, and 2-layer of 4-mil poly for ceilings) and the encapsulation of post removal surfaces.
      ii. Establish a decontamination unit in accordance with applicable regulations. Properly sealed (double waste-bagged, cleaned, labeled, etc.) waste materials may be transported through the 3-stage decontamination unit to the transport vehicle.
      iii. Consistently and thoroughly wet asbestos containing materials with a fine spray of amended water. Carefully remove (manual hand-methods) and immediately place asbestos in approved and properly labeled 6-mil polyethylene disposal bags or drums. Diligently scrape or brush asbestos residue materials from surfaces using wet methods. Surfaces shall be free of visible debris and surfaces shall be wet cleaned and/or HEPA vacuumed clean.
   f. Dumpster:
      i. Debris located in the on-site dumpsters shall be properly packaged in a negative pressure work area (“containment”). The containment must seal the top of each dumpster and extend beyond the rear opening allowing enough space to construct a waste load out chamber of sufficient size to accommodate the workers and disposal requirements. Asbestos waste containers shall be sealed with duct tape, properly labeled and placed into a secure secondary container for storage and transport to an EPA approved asbestos waste special waste landfill site. Once the dumpsters have been cleared of all asbestos waste and debris and decontaminated, they can be removed and the grounds underneath inspected for debris.

6. Comply with requirements for final clearance and release of a work area as described in this Section and the NTWP and as required by applicable regulations prior to tear down of polyethylene and area clean up. Perform Final Clearance Visual Inspections in accordance with the testing requirements outlined in Section 3.3.

7. Refer to Attachment A (Table 1.0) for a summary of materials that require abatement at the site. In addition, refer to the Drawings.

1.8 CODES AND STANDARDS

A. All work shall conform to the standards set by applicable Federal, State and local laws, regulations, ordinances, and guidelines in such form in which they exist at the time of the work on the contract, and as may be required by subsequent regulations. In addition to any detailed requirements of the Specification, the Asbestos Abatement Contractor shall at his own cost and expense comply with all laws, ordinances, rules and regulations of Federal, State, Regional and Local Authorities regarding handling and storing of asbestos waste material. This includes all applicable OSHA regulations.

B. All regulations and other governing agencies in their most current version are applicable throughout this project. Where there is a conflict between this Specification and the cited State, Federal, or local regulations, the more restrictive or stringent requirements shall prevail. This Section refers to many requirements found in these references, but in no way is it intended to cite or reiterate all provisions therein or elsewhere. It is the Asbestos Abatement Contractor's responsibility to know, understand, and abide by all such regulations and common practices.

1.9 FEES, PERMITS & LICENSES

A. The Asbestos Abatement Contractor shall pay all licensing fees, royalties, and other costs necessary for the use of any copyrighted or patented product, design, invention, or process in the performance of the work specified in this section. The Asbestos Abatement Contractor shall be solely responsible for costs, damages, or losses resulting from any infringement of these patent rights or copyrights. The Asbestos Abatement Contractor shall hold the Owner and Consultant harmless from any costs, damages, and losses resulting from any infringement of these patent rights or copyrights. If the Contract Specification requests the use of any product, design, invention, or process that requires a licensing, patent or royalty fee for use in the performance of the job, the Asbestos Abatement Contractor shall be responsible for the fee or royalty fee and shall disclose the existence of such rights.

B. Asbestos Abatement Contractor shall be responsible for costs for all licensing requirements, where applicable and notification requirements and all other fees related to the Asbestos Abatement Contractors' ability to perform the work in this Section.

C. Secure all necessary permits for work under this Section, including hauling, removal, and disposal, fire, and materials usage, or any other permits required to perform the specified work.

1.10 CLEANING

A. Maintain the work site in a neat and orderly manner at all times, so as not to interrupt or infringe upon the work of other trades. Perform all final cleaning of abatement work areas as required by this Section and Massachusetts Regulations to the approval of the Owner's Consultant. Upon completion of work in any given area, Asbestos Abatement Contractor shall remove all material and equipment associated with the work, not necessary to complete other phases of the work in that area.

B. At the end of each work day the Contractor shall ensure that the building is secured and all exterior areas of the building are free and clear of all work-related debris.

C. Comply with all requirements for final clearance and release of a work area as described in this Section and required by the Massachusetts Regulations prior to take down of polyethylene and area clean-up.

1.11 COORDINATION

A. Extend full cooperation to Owner in all matters involving the use of Owner's facilities. At no time shall the Asbestos Abatement Contractor cause or allow conditions to be caused, which may cause risk or hazard to the general public, or conditions that might impair safe use of the facility.

B. Complete Asbestos activities in the phases of the final schedule agreed upon by Owner.

C. The Asbestos Abatement Contractor shall be made aware that separate contracts will be engaged by the Owner for other work to be performed within the site building. The Asbestos Abatement Contractor shall be made aware that those Contracts will be on-going during the same time as the asbestos abatement work outlined herein. The work of this Contract shall proceed in "harmony" with the work of those projects, which will be subject to coordination by the Owner. No additional compensation or contract time shall be granted for failure to recognize and comply with this requirement.

1.12 SUBSTITUTION OF MATERIALS OR METHODS

A. Owner and Consultant approval is required for all modifications to methods, procedures, and design, which may be proposed by the Asbestos Abatement Contractor. It is the intent of these documents to allow the Asbestos Abatement Contractor to present alternative methods to the abatement processes herein, for review by Owner and Consultant. Any such modifications or substitutions to methods, procedures, or design shall comply with applicable regulations. Asbestos Abatement Contractor shall submit the proposed modification or substitution in accordance with the requirements of the General Conditions, and no later than fifteen (15) working days prior to planned commencement of proposed modification, for review and approval.

B. Unless requests for modification or substitution are made in accordance with the above instructions and the instruction of the General Conditions, supported by sufficient proof of equality, Asbestos Abatement Contractor shall be required to furnish the specifically named or designed items, methods or procedures designated in this Section.

C. If the modification or substitution necessitates changes or additional work, same shall be provided and the Asbestos Abatement Contractor shall assume the cost and the entire responsibility thereto unless performed under the approved Change Order Process.

D. The Owner and Consultant's permission to make such substitution shall not relieve the asbestos Abatement Contractor from full responsibility for the work.

1.13 SITE SECURITY

A. The Asbestos Abatement Contractor is responsible for performing all work under this contract without contaminating the building or environment with asbestos fibers. This includes interior areas, outside containment locations, machinery and equipment and any other release into unregulated spaces. The Asbestos Abatement Contractor is responsible for making right and clean-up of any such contamination if found to be present.

B. The Asbestos Abatement Contractor will be responsible for the security of the abatement area, allowing only authorized personnel into the area, and securing assigned entrances and exits at the end of the work day. Signs will be posted prior to asbestos removal as required in 29 CFR 1926.1101.

1.14 PROJECT MONITOR

A. The Owner has retained ATLAS, as their Consultant for technical advisement and project management during the Project. In addition, ATLAS will perform project monitoring services during abatement activities. The Asbestos Abatement Contractor shall regard ATLAS's direction, as authoritative and binding as provided herein, in matters outlined by this Section.

B. ATLAS's licensed Project Monitor, acting as the Owner's Representative, will perform monitoring of the Asbestos Abatement Contractor's work practices and performance, inspection of the worksites, and air sampling and analysis for each phase of the asbestos removal project. Quality control and testing criteria have been established in these specifications, and will be strictly enforced. ATLAS's Project Monitor will review matters relating to safety, interpretation of the specifications, and scheduling of work, and will make decisions upon consultation with the Owner.

1.15 TEMPORARY FACILITIES

A. The Asbestos Abatement Contractor shall coordinate the Owner as to the use of the existing power and water within the building.

B. All temporary hook-ups to the existing power and water within the building shall be the responsibility of the Asbestos Abatement Contractor.

C. The Asbestos Abatement Contractor shall also be responsible for providing all temporary toilets required for workers to use during the construction project.

PART 2 - PRODUCTS

2.1 MATERIALS

A. All materials and equipment proposed to be used on this project shall be subject to the acceptance of the Owner and Consultant. The Asbestos Abatement Contractor shall comply with local, state and federal regulations pertaining to the selection and use of materials and equipment on this project. The Asbestos Abatement Contractor shall provide a submittal on all materials and equipment to be used for review and approval by the Consultant prior to commencement of the work.

PART 3 - EXECUTION

3.1 WORK PROCEDURES

A. All asbestos abatement work shall take place in accordance with the provisions outlined herein as well as local, state and federal regulations. In particular, Massachusetts DLS and DEP regulations regarding asbestos removal and disposal shall be adhered to.

B. Visual Inspections: Work areas shall pass a visual inspection conducted by the Site Supervisor responsible for the project and the Owner's Project Monitor (i.e. Consultant). The criterion for this inspection will be the absence of visible debris in accordance with ASTM standard E1368-90. A certificate of visual inspection will be signed by the Project Monitor and the Site Supervisor after final inspection clearance. The Contractor will be responsible for the costs of visual inspection and testing required for any work which fails clearance air quality criteria.

3.2 DISPOSAL

A. Packaging: Prior to post-abatement inspection, asbestos- containing waste shall be packaged in sealed double containers and removed from the work area to a specified transportation vehicle or a designated holding area approved by the Owner. At the end of each work day the Asbestos Abatement Contractor shall remove the debris accumulated during that day's work activities using procedures outlined in the Specifications. The Asbestos Abatement Contractor shall provide a daily tally of all bags removed.

B. Temporary Storage of Waste: An area for temporary storage of asbestos waste must be approved by the Owner. Asbestos waste may only be stored in an **enclosed container** which is posted with asbestos warning signs and secured (locked) whenever not in use. Asbestos waste material shall be loaded into a waste transportation vehicle/dumpster and hauled away as soon as there is a sufficient quantity available for direct transportation to the approved disposal site. The storage container with ACM waste will stay on site no longer than 30 days past the end of abatement activities and successful completion of a visual inspection per 310 CMR 7.15(8).

C. OSHA/EPA labeling: Asbestos warning labels having permanent adhesive and waterproof print, or being permanently printed on the container, shall be affixed to the outside of all asbestos containers, and each inside bag, except that nonfriable asbestos-containing waste that has not been and does not have a high probability of becoming, crumbled, pulverized, or reduced to powder need not be labeled. Labels will be conspicuous and legible and shall contain the following warning:

DANGER
CONTAINS ASBESTOS FIBERS
MAY CAUSE CANCER
CAUSES DAMAGE TO LUNGS
DO NOT BREATHE DUST
AVOID CREATING DUST

The Asbestos Abatement Contractor is directed to properly label each waste bag in accordance with the latest NESHAP standard, Section 61.150, with the following information:

SITE OWNER'S NAME
SITE NAME

D. DOT labeling and marking: A DOT "class 9" shipping label and DOT mark shall be applied to or be printed on each packaging of asbestos-containing materials; except for nonfriable asbestos-containing materials that did not become crumbled, pulverized, or reduced to powder; or a limited quantity of asbestos-containing material which is not being transported by air.

E. EPA vehicle marking: Each vehicle transporting asbestos-containing waste shall be marked with asbestos danger signs during loading and unloading of the waste, in accordance with the NESHAP,40 CFR 61.150.

F. Asbestos waste shipment records: The Asbestos Abatement Contractor shall prepare the waste shipment records. Completed waste shipment record(s) signed by the Asbestos Abatement Contractor, all transporter(s), transferor(s), disposal and/or conversion facility(s), shall be provided to the Owner within 30 days of the time at which the asbestos-containing wastes are received at the disposal and/or conversion facility (ies), which shall be no longer than 40 days after the waste was accepted by the initial transporter. The Waste Shipment Record shall specify the designated number of bags or cubic yard(s) of asbestos waste.

1. The Asbestos Abatement Contractor shall email Worcester Public Schools and MassDEP copies of the incomplete Waste Shipment Records the day the waste leaves the site.

G. Depositing: Asbestos waste shall be deposited as soon as practical at a regulated waste disposal site, except for EPA "Category I" nonfriable ACM that has not become friable, nor will be or has been sanded, ground, cut, or abraded. Waste disposal sites for asbestos materials will be in accordance with 40 CFR 61.25, Waste Disposal Sites. The Contractor shall provide written evidence that the site is approved for asbestos disposal by the EPA, State and local regulatory agencies.

3.3 QUALITY CONTROL AND TESTING

A. The Asbestos Abatement Contractor shall be responsible for achieving acceptable visual inspection in all work areas for abatement areas as follows, as applicable:

1. Clearance inspection: ATLAS's Project Monitor shall inspect the work area and surrounding areas for clearance using visual and physical methods.
2. Transmission Electron Microscopy (TEM) clearance testing will be performed to confirm the completion of the abatement activities in the interior work areas except for Phase 1. Phase Contrast Microscopy (PCM) clearance testing will be performed for the clearance of Phase 1 and dumpster. All clearance testing shall be performed in accordance with State of Massachusetts and EPA "Asbestos Hazard Emergency Response Act" (AHERA) Regulations. The work areas shall be considered complete if the following criteria are met:
   i. TEM: Maximum airborne concentration of the average of the five inside the work area samples less than 70 structures per square millimeter (<70 s/mm^2).
   ii. PCM: Containment cleared and samples analyzed by Phase Contrast Microscopy (PCM): Maximum airborne fiber concentration of <0.01 fibers per cubic centimeter (minimum 5 samples).

ATTACHMENT A

TABLE 1.0

SUMMARY OF ACM TO BE ABATED

Table 1.0 Asbestos Abatement Worcester Public Schools Millbury Head Start			
LOCATION	**MATERIAL**	**AMOUNT**	**NOTES**
Throughout	Decontamination (Wet clean/HEPA)	21,600 SF	
Gymnasium	Pipe & Fitting Insulation	225 LF	
Dumpster	Debris	15 yd.	

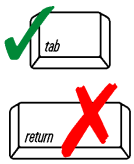
ATTACHMENT B

NON-TRADITIONAL WORK PLAN

Massachusetts Department of Environmental Protection
Bureau of Air & Waste
AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

A. Work Site Information

Important: When completing forms on a computer, use only the tab key to move your cursor - do not use the return key.



Facility

Millbury Head Start
Facility Name or Site Description

389 Millbury Street
Facility Address

Worcester | MA | 01610
City/Town | State | ZIP Code

Owner

Worcester Public Schools
Owner Name

115 Northeast Cutoff
Owner Address

Worcester | MA | 01606
City/Town | State | ZIP Code

508-799-3151 | Brittany Helgerson (helgersonb@worcesterschools.net)
Telephone Number

Applicant - ☐ Check here if same as Owner and skip to next section. Otherwise, complete fields below.

Edward Kolodziej
Applicant Name

73 William Franks Drive
Applicant Address

West Springfield | MA | 01089
City/Town | State | ZIP Code

413-781-0070 | edward.kolodziej@oneatlas.com
Telephone Number | Email Address

B. Project Information

Asbestos Project Designer & Consulting Service Provider

Edward Kolodziej
Asbestos Project Designer Name

AD074321 | 08/27/2027
DLS Project Designer License Number | Expiration Date (MM/DD/YYYY)

ATLAS Technical Consultants LLC
Consulting Service Provider Name

AF22 | 04/14/2027
DLS Consulting Service Certification Number | Expiration Date (MM/DD/YYYY)

73 William Franks Drive
Address

West Springfield | MA | 01089
City/Town | State | ZIP Code

413-781-0070 | edward.kolodziej@oneatlas.com
Telephone Number | Email Address

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Massachusetts Department of Environmental Protection
Bureau of Air & Waste
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B. Project Information (continued)

Asbestos Project Monitor & Consulting Service Provider

Edward Kolodziej
Asbestos Project Monitor Name

AM001903 | 8/27/2027
DLS Asbestos Project Monitor Certification Number | Expiration Date (MM/DD/YYYY)

ATLAS Technical Consultants, LLC
Consulting Service Provider Name

AF22 | 04/14/2027
DLS Consulting Service Certification Number | Expiration Date (MM/DD/YYYY)

73 William Franks Drive
Address

West Springfield | MA | 01089
City/Town | State | ZIP Code

413-781-0070 | edward.kolodziej@oneatlas.com
Telephone Number | Email Address

Asbestos Abatement Contractor

TBD
Contractor Name

DLS Contractor Certification Number | Expiration Date (MM/DD/YYYY)

Address

City/Town | State | ZIP Code

Telephone Number | Email Address

Demolition Contractor (If Applicable)

N/A
Contractor Name

Address

City/Town | State | ZIP Code

Telephone Number | Email Address

Circumstances – Explain why a Non-Traditional Asbestos Abatement Work Practice Approval is needed.

Note: Check all applicable boxes.

- ☐ Facility is being demolished under a state or local government order because it is structurally unsound and in danger of imminent collapse. (Please attach a copy of the order to your work plan proposal.)
- ☐ Asbestos Containing Material (ACM) or Asbestos Containing Waste Material (ACWM) was not accessible for testing, thus not discovered until after demolition began and, as a result, cannot be safely removed.
- ☐ Abatement activity is being conducted as part of an emergency renovation operation.
- ☒ Asbestos abatement activity is being conducted to clean up and decontaminate all or part of a facility where:
  - ☒ Previous asbestos abatement activities were not conducted in compliance with 310 CMR 7.15, or
  - ☐ ACM deterioration, if not immediately attended to, would present a safety or public health hazard.
- ☐ Wetting during a facility renovation would unavoidably damage equipment or present a safety hazard.
- ☐ The project requires bulk loading of ACM and/or ACWM.

Massachusetts Department of Environmental Protection
Bureau of Air & Waste
AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

B. Project Information (continued)

List the requirements of 310 CMR 7.15 that you are unable to comply with and explain why:

7.15 (7)(c)(5); 7.15 (7)(c)(6)

Other Project Details

Project Start Date: TBD (MM/DD/YYYY)

Project End Date: TBD (MM/DD/YYYY)

Types & Amounts of ACM and/or ACWM Requiring Non-Traditional Asbestos Abatement Work Practice(s):

☒ Friable 20 Quantity in Cubic Meters (Cubic Yards)

☒ Non-Friable 5 Quantity in Cubic Meters (Cubic Yards)

Location(s) of ACM in the Facility:

Dust contamination throughout; TSI in Gymnasium

C. Certification

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment. I am aware that this permit application or notification shall not be deemed valid unless payment of the applicable fee is made."

Signature

Edward Kolodziej
Printed Name

Senior Project Manager
Title

10/30/2026
Date (MM/DD/YYYY)

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Massachusetts Department of Environmental Protection
Bureau of Air & Waste
AQ 36 Application for Non-Traditional Asbestos Abatement Work Practice Approval

D. Submission of Application

Note: MassDEP review will begin only after your submissions have been received at both locations.

STEP 1: Submit Application

Send the following materials to the appropriate MassDEP Regional Office*, Attention: Asbestos Section:

☒ This original completed and signed form.

☒ A copy of the check or money order referenced in Step 2.

☒ Your proposed work plan, describing work practices, duration, and schedule. The proposal must:

- Include signature of the Asbestos Project Designer who prepared it.
- Demonstrate that the deviations from 310 CMR 7.15 and alternatives proposed will not cause any visible emissions to the outside air or pose significant risk to public health, safety or the environment.

☒ All supporting documentation.

*Find the MassDEP Regional Office for the community where this work will be done: https://www.mass.gov/service-details/massdep-regional-offices-by-community

STEP 2: Submit Fee Payment

Send the materials below to this address:

MassDEP
P.O. Box 4062
Boston, MA 02211

☒ A copy of this completed and signed form.

☐ Fee payment of $600* (check or money order payable to “Commonwealth of Massachusetts”).

*The following entities are exempt from this fee:

- Cities, towns, counties or districts of the Commonwealth
- Federally recognized Indian tribe housing authorities
- Municipal housing authorities
- The Massachusetts Bay Transportation Authority (MBTA)

Is this a fee-exempt project? ☒ Yes ☐ No

NOTE: Entities that are exempt from the fee must still submit a copy of this completed and signed form, without payment, to the P.O. box above.

November 6, 2026

Ms. Christa Cronk
Asbestos Program Section Chief
Bureau of Air and Waste
MassDEP Central Region Office
8 New Bond Street
Worcester, MA 01606

RE: Non-Traditional Asbestos Abatement Work Plan
Worcester Public Schools
Millbury Head Start

Dear Ms. Cronk:

On behalf of the City of Worcester, ATLAS Technical Consultants LLC (ATLAS) is submitting for MassDEP's review and approval of the following Non-Traditional Asbestos Abatement Work Plan (NTWP) for abatement activities at the Worcester Public Schools, Millbury Head Start.

The project involves the decontamination of asbestos from classrooms at the Millbury Head Start. A major fiber release episode (5 LF of pipe insulation) was reported in the gymnasium and MA DLS was notified. Wipe sampling was performed in the basement area in rooms adjacent to the gymnasium to determine the extent of possible asbestos contamination. Lab results indicated the presence of asbestos in the surrounding areas. Additional samples were collected on the first and second floors and results indicated the presence of asbestos on several of the wipe samples. The presence of asbestos in the dust may not be directly related to the major fiber release in the basement gymnasium. Air samples were collected to determine the airborne fiber concentrations using fans to simulate building occupancy. The air samples were analyzed by Transmission Electron Microscopy (TEM) and laboratory analysis indicated No Asbestos Detected in all the samples. Since asbestos is present in the dust the school shall be cleaned by a State of Massachusetts licensed asbestos contractor.

In order to perform the decontamination in the school we are unable to comply with the following sections of 310 CMR 7.00 regulations:

- 310 CMR 7.15 (7)(c)(5) Specific Asbestos Abatement Work Practice Standards – Work Area Preparation Requirements; Covering of Floor and Wall Surfaces
- 310 CMR 7.15 (7)(c)(6) Specific Asbestos Abatement Work Practice Standards – Work Area Preparation Requirements; Covering of Ceiling Surfaces

The contractor and consultants that are participating in this project are as follows:

NTWP Asbestos Consultant:	**Owner:**	**Contractor:**
ATLAS Technical Consultants LLC 73 William Franks Drive West Springfield, MA 01089	Worcester Public Schools 115 Northeast Cutoff Worcester, MA 01606	TBD

Under this proposed work plan, the following provisions shall be adhered to when performing the work:

1. Abatement\Decontamination Procedures

   a. All Asbestos Abatement Activities shall take place in accordance with the provisions outlined herein as well as current local, state and federal regulations.

   b. After the work area has been prepared, the Asbestos Abatement Contractor shall request a pre-abatement inspection by notifying the MassDEP Central Regional Office Inspector(s) with a minimum of 24 hours in advance.

   c. Upon completion of the work, the Asbestos Abatement Contractor shall notify the MassDEP Central Regional Office 24 hours in advance for a post abatement inspection.

   d. The asbestos abatement contractor shall contain the asbestos contaminated rooms utilizing critical barriers consisting of at a minimum of one layer of 6-mil polyethylene sheeting with a contiguous 3-Stage decontamination unit. Workers must wear respiratory protection and disposable suits during cleaning activities. Water used to decontaminate equipment and personnel shall be used as an additional wetting agent for disposal of packaged ACM.

   e. Windows shall be cleaned and sealed with one layer of 6-mil polyethylene sheeting prior to commencing with decontamination procedures in the rooms.

   f. The rooms shall be placed under negative pressure utilizing air filtration units equipped with HEPA filters. The Asbestos Abatement Contractor shall use a sufficient amount of negative air units to ensure that 4 air changes per hour with the work areas. All negative air units shall visual and operational alarms indicating the unit is operating properly.

   g. Asbestos contractor shall clean all surfaces utilizing wet methods and HEPA vacuums. Amended water (Surfactant, cleaning detergents, etc.) shall be used during the abatement activities. Non-moveable objects (bulletin boards, white boards, smart boards) shall be cleaned and sealed with 6-mil polyethylene sheeting.

   h. All electronic equipment (i.e. computers, televisions, video, printers, etc.) and non-porous items shall be decontaminated and pass a visual inspection by the asbestos site supervisor and project monitor prior to being removed from the work area. All such items shall then be transported through the decon/waste load out area and placed in an on-site storage area provided by the Owner. The storage container shall be marked “Clean Materials Only” or similar to prevent packaged ACWM from being stored in the same container.

   i. All porous materials (books, paper, cardboard, etc.) shall be disposed of as ACWM. An inventory of disposed materials shall be maintained by the asbestos abatement site supervisor. ACWM shall be placed into two 6-mil asbestos bags and labelled with asbestos warning and generator information as described in 310 CMR 7.15(15).

j. Gymnasium: Once items in the gym have been decontaminated, passed visual inspection & final air clearance criteria as described in the MassDEP and MA DLS regulations and removed from the work area the remaining asbestos pipe insulation shall be removed. Asbestos pipe insulation shall be removed according to specification in a traditional asbestos abatement containment.

k. The Asbestos Abatement Contractor is to follow procedures as described in the NTWP along with the requirements described in the project specification.

2. Final Air Clearance

a. Final asbestos air clearance testing shall be performed according to the MA DLS Regulations upon successfully passing a visual inspection performed jointly by the asbestos site supervisor and project monitor, as referenced above.

b. Phase 1 area shall be air tested using Phase Contrast Microscopy (PCM) in order to establish a clean area for the decontamination unit inside the building.

- Containment cleared and samples analyzed by Phase Contrast Microscopy (PCM): Maximum airborne fiber concentration of <0.01 fibers per cubic centimeter (minimum 5 samples).

The remaining areas contained shall be air tested utilizing Transmission Electron Microscopy (TEM) analysis and meeting the following criteria:

- Maximum airborne fiber concentration of less than or equal to 70 structures per square millimeter ($\leq$ 70 s/mm^2) for the average of the 5 inside containment samples.

3. <u>Perimeter Air Monitoring - Asbestos Project Monitor</u>

a. The APM shall perform air monitoring of the ambient air around the outside of the work area utilizing Phase Contract Microscopy (PCM) analysis. Daily air monitoring shall consist of air samples collected during asbestos activities. Monitoring is to ensure asbestos fibers are contained within the work area.

b. Air samples shall have flow rates between seven to sixteen liters per minute (7-16 lpm) with a minimum volume of air at 1,080 liters of air.

c. Analyses of the air samples shall be performed on-site immediately after collection and results reported to the asbestos supervisor and general contractor for review, so that corrections in the work practices can be made immediately.

d. If the air monitoring results reaches or exceeds one - one hundredth fiber per cubic centimeter (0.010 f/cc) of air, then all work shall stop and the MassDEP notified immediately. The work methods shall then be evaluated by the APM, the Asbestos Site Supervisor and the general contractor. Continuation of asbestos abatement activities are not to proceed until approval by the MassDEP.

e. A copy of the results for all perimeter air samples collected each day shall be kept on-site and emailed to the MADEP the same day the samples are collected and analyzed.

4. General Conditions
   a. No work pursuant to this Work Plan shall commence unless the Asbestos Project Monitor has performed a daily pre-abatement inspection of the work area and all air monitoring stations are in full operation.
   b. This Work Plan applies specifically to the asbestos abatement activity for the decontamination of rooms at the Millbury Head Start, Worcester, MA. This Work Plan does not apply to any past or future asbestos handling at the site. All other MassDEP regulations are in force for the balance of this asbestos abatement operation.
   c. The Plan does not negate the responsibility of the Site owner, the Asbestos Abatement Contractor, subcontractors and consultants from complying with all other applicable federal, state and local laws and regulations.

5. Timeframe of Approval
   a. This Work Plan is valid as stipulated by the MassDEP.
   b. If activities are to continue past the expiration date after this Plan is approved by MassDEP; the MassDEP shall be contacted to determine if a request for an extension shall be submitted or resubmittal of the NT Permit and Work Plan, with applicable fees, for their approval/renewal.

6. Changes in Conditions/Scope of Work
   a. Any variance from the proposed conditions listed above shall be evaluated by MassDEP prior to commencement of any such activities.
   b. All requests for changes to or amendments of this Work Plan shall be made to the MassDEP in writing.
   c. MassDEP shall issue a revised Approval in writing.

7. Recording Keeping
   a. All documentation regarding air monitoring collection procedures and analysis results, visual inspections and waste disposal shall be kept on site for inspection by MassDEP personnel for the duration of the removal operation.
   b. Copies of the documentation are to be supplied to MassDEP upon request and within thirty (30) days of completion of the work.

I appreciate your attention regarding this matter and look forward to hearing your response. If you have any questions, please do not hesitate to contact me at (413) 781-0070.

Sincerely,
ATLAS Technical Consultants LLC

Edward Kolodziej
Senior Project Manager (AD074321)

Brian Williams
Area Manager

EMSL Analytical, Inc.
10-39 45th Road, Long Island City, NY 11101
Phone/Fax: (212) 290-0051 / (212) 290-0058
http://www.EMSL.com manhattanlab@emsl.com

EMSL Order:	032617262
CustomerID:	ATC62
CustomerPO:	11-81-0030
ProjectID:	

Attn: **Brian Williams**
Atlas Technical
73 William Franks Drive
West Springfield, MA 01089

Phone:	(413) 781-0070
Fax:	(413) 781-3734
Received:	10/23/2026 09:54 AM
Analysis Date:	10/24/2026
Collected:	10/22/2026

Project: **183BWS2699 / Millbury Head Start / 389 Millbury St., Worcester**

Test Report:Qualitative Asbestos Analysis by Transmission Electron Microscopy (TEM) and Filtration Technique

Sample	Description	TEM Result	Notes
1 *032617262-0001*	Gym Floor - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
2 *032617262-0002*	Gym Table - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
3 *032617262-0003*	Custodial Office Floor - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
4 *032617262-0004*	Staff Room Floor - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
5 *032617262-0005*	Staff Room Table - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
6 *032617262-0006*	Corridor Book Shelf - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	
7 *032617262-0007*	Corridor by Kitchen Floor - 12"x12" (Square Foot) Wipe Sample	**Chrysotile**	

Analyst(s)

Azamat Mashukov (4)
Steven Dutter (3)

Charles Johnson, Laboratory Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Long Island City, NY

Initial report from 10/24/2026 10:45:14

032617262

Asbestos Bulk Sample Chain-of-Custody

Project Name: Millbury Head Start

Project Address: 389 Millbury St. Worcester

Project Number: 183WPS2699

Project Manager: B. Williams

Sampled By: J. Levesque

Results To: B. Williams + justin.levesque@oneatlas.com

Analysis Type: TEM Filtration Method

Turnaround Time: 24 Hour

Date: 10/22/26

Positive Stop: Yes (No)

Special Instructions or Comments:

Field ID	Sample Description	Location	Homogeneous Material
1	Wipe Sample	12"x12" Gym Floor	1
2		12"x12" Gym Table	2
3		12"x12" Custodial Office Floor	3
4		12"x12" Staff Room Floor	4
5		12"x12" Staff Room Table	5
6		12x12 Corridor Bookshelf	6
7		12x12 Corridor by Kitchen Floor	7

EMSL LONG ISLAND CITY LAB RECEIVED 2026 OCT 23 A 9:54

Page 1 Of 1

Relinquished By: _____ **Date:** 10/22/26

Relinquished By: _____ **Date:** _____

Received By: _____ **Date:** 10/23/26 9:54am

Received By: _____ **Date:** _____

FEX-792370339920

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OrderID: 032617262

EMSL Analytical, Inc.

10-39 45th Road Long Island City, NY 11101

Tel/Fax: (212) 290-0051 / (212) 290-0058

http://www.EMSL.com / manhattanlab@emsl.com

EMSL Order: 032617418
Customer ID: ATC62
Customer PO: 11-81-0030
Project ID:

Attention: Brian Williams
Atlas Technical
73 William Franks Drive
West Springfield, MA 01089

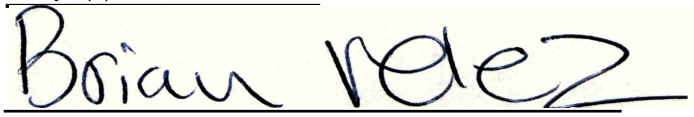
Phone: (413) 781-0070
Fax: (413) 781-3734
Received Date: 10/26/2026 20:40 PM
Analysis Date: 10/27/2026
Collected Date: 10/26/2026

Project: 183COW2601/ WPS/ Millbury Head Start/ 389 Millbury St. Worcester

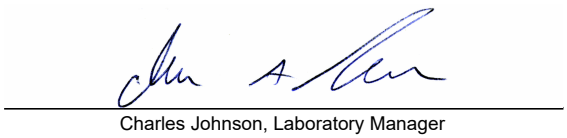
Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm²)	Non Asb	Asbestos Type(s)	#Structures ≥0.5µ < 5µ	#Structures ≥5µ	Analytical Sensitivity (S/cc)	Asbestos Concentration (S/mm²)	Asbestos Concentration (S/cc)
1	Gym	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0001										
2	Staff Room	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0002										
3	Kitchen	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0003										
4	STEAM Room	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0004										
5	Art Room	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0005										
6	1st Floor Hallway	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0006										
7	Room 3	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0007										
8	Room 2	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0008										
9	Room 4	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0009										
10	Room 1	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0010										
11	Room 5	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0011										
12	Room 6	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0012										
13	Room 7	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0013										
14	Room 8	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0014										
15	2nd Floor Hallway	1235.00	0.0630	0	None Detected	0	0	0.0049	<16.00	<0.0049
032617418-0015										

Analyst(s)



Brian Velez (15)



Charles Johnson, Laboratory Manager
or other approved signatory

Initial report from: 10/27/2026 02:21 AM

EMSL Analytical, Inc.
10-39 45th Road Long Island City, NY 11101
Tel/Fax: (212) 290-0051 / (212) 290-0058
http://www.EMSL.com / manhattanlab@emsl.com

EMSL Order: 032617418
Customer ID: ATC62
Customer PO: 11-81-0030
Project ID:

Attention: Brian Williams
Atlas Technical
73 William Franks Drive
West Springfield, MA 01089

Phone: (413) 781-0070
Fax: (413) 781-3734
Received Date: 10/26/2026 20:40 PM
Analysis Date: 10/27/2026
Collected Date: 10/26/2026

Project: 183COW2601/ WPS/ Millbury Head Start/ 389 Millbury St. Worcester

Test Report: Asbestos Fiber Analysis by Transmission Electron Microscopy (TEM) Performed by EPA 40 CFR Part 763 Appendix A to Subpart E

Sample	Location	Volume (Liters)	Area Analyzed (mm^2)	Non Asb	Asbestos Type(s)	#Structures ≥0.5μ < 5μ	#Structures ≥5μ	Analytical Sensitivity (S/cc)	Asbestos Concentration (S/mm^2)	Asbestos Concentration (S/cc)

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Samples analyzed by EMSL Analytical, Inc. Long Island City, NY NVLAP Lab Code 101048-9, AIHA LAP, LLC-IHLAP Accredited #102581, NYS ELAP 11506, NJ NY022, CT PH-0170, MA AA000170

Initial report from: 10/27/2026 02:21 AM

032617418 BV W8

ATLAS

TEM AIR SAMPLING CHAIN-OF-CUSTODY

Project Name: Millbury Head Start | Collection Date: 10/26/26 | Collected By Signature: [signature]
Project #: [redacted] 183COW2601 | Project Monitor: J. Levesque | TEM Turnaround Time: 6 Hour
Client: WPS | Project Manager: B. Williams | Send Results to: B. Williams, E. Rdodz
Location: 389 Millbury St Worcester | Rotometer #: HF-9 | justin.levesque@oneatlas.com

Sample #	Location or Worker Name/SSN/Task/PPE	Sample Type (1-10)	Time Start	Time End	Flow Rate Start	Flow Rate End	Total Time	Volume (L)
1	Gym	10	9:35	11:45	9.5	9.5	130	1235
2	Staff Room		9:36	11:46	9.5	9.5	130	1235
3	Kitchen		9:37	11:47	9.5	9.5	130	1235
4	STEAM Room		9:37	11:47	9.5	9.5	130	1235
5	Art Room		9:38	11:48	9.5	9.5	130	1235
6	1st [redacted] Flor Hallway		11:56	2:06	9.5	9.5	130	1235
7	Room 3		11:57	2:07	9.5	9.5	130	1235
8	Room 2		11:58	2:08	9.5	9.5	130	1235
9	Room 4		11:59	2:09	9.5	9.5	130	1235
10	Room 1		12:00	2:10	9.5	9.5	130	1235
11	Room 5		2:15	4:25	9.5	9.5	130	1235
12	Room 6		2:16	4:26	9.5	9.5	130	1235
13	Room 7		2:16	4:26	9.5	9.5	130	1235

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Sample Type: 1) Area Background 2) Pre-Abatement 3) During Prep Work 4) During Removal 5) During Final Clean
6) During Glovebag Removal 7) Final Air Clearance 8) Personal Air Sample 9) Associated Work 10) Hazard Assessment

Relinquished By: [signature] Date: 10/26/26 Received By: William Peña Date: 10/26/26 8:40pm
Relinquished By: Date: Received By: Date:

Brian Velez 10-27-26 2:13 AM

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OrderID: 032617418

032617418

ATLAS

TEM AIR SAMPLING CHAIN-OF-CUSTODY

Project Name: Millbury Head Start
Project #: 183C0W2601
Client: WPS
Location: 389 Millbury St. Worcester

Collection Date: 10/26/26
Project Monitor: J. Levesque
Project Manager: B. Williams
Rotometer #: HE-9

Collected By Signature: [signature]
TEM Turnaround Time: 16 Hour
Send Results to: B. Williams, E. Kolodzi
justin.levesque@oneatlas.com

Sample #	Location or Worker Name/SSN/Task/PPE	Sample Type (1-10)	Time Start	Time End	Flow Rate Start	Flow Rate End	Total Time	Volume (L)
14	Room 8	10	2:17	4:27	9.5	9.5	130	1235
15	2nd Flour Hallway	1	2:18	4:28	9.5	9.5	130	1235
16	Blank 1							
17	Blank 2							

EMSL LONG ISLAND CITY LAB RECEIVED 2026 OCT 26 P 8:40

Sample Type: 1) Area Background 2) Pre-Abatement 3) During Prep Work 4) During Removal 5) During Final Clean
6) During Glovebag Removal 7) Final Air Clearance 8) Personal Air Sample 9) Associated Work (10) Hazard Assessment

Relinquished By: [signature] Date: 10/26/26
Relinquished By: Date:

Received By: William Peña Date: 10/26/26 8:40pm
Received By: Date:

Brian Velez 10-27-26 2:13AM

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EMSL Analytical, Inc.

10-39 45th Road Long Island City, NY 11101
Tel/Fax (212) 290-0051 / (212) 290-0058
http://www.EMSL.com / manhattanlab@emsl.com

EMSL Order: 032617454
Customer ID: ATC62
Customer PO: 11-81-0030
Project ID:

Attention: Brian Williams
Atlas Technical
73 William Franks Drive
West Springfield, MA 01089

Phone:
Fax: (413) 781-3734
Received Date: 10/26/2026 8:39 PM
Analyzed Date: 10/28/2026 - 10/29/2026
Collected Date: 10/26/2026

Project: 183COW2601/ Millbury Head Start/ 389 Millbury St., Worcester

Test Report: Qualitative Asbestos Analysis by Transmission Electron Microscopy (TEM) and Filtration Technique

Sample	Description	TEM Result	Notes
1 *032617454-0001*	Room 8 Toy Storage Shelving	None Detected	
2 *032617454-0002*	Room 7 Floor	None Detected	
3 *032617454-0003*	Room 6 Floor	**Chrysotile**	<4 asbestos fibers detected
4 *032617454-0004*	Room 5 Blue Play Table	None Detected	
5 *032617454-0005*	2nd Floor Hall Office #1 Desk	None Detected	
6 *032617454-0006*	2nd Floor Hall Office #2 Floor	**Chrysotile**	<4 asbestos fibers detected
7 *032617454-0007*	2nd Floor Hall Office #3 File Cabinet and Chair Rail	None Detected	
8 *032617454-0008*	2nd Floor Kids Bath Countertop	None Detected	
9 *032617454-0009*	2nd Floor Hall Floor	None Detected	
10 *032617454-0010*	2nd Floor Main Office Floor	**Chrysotile**	<4 asbestos fibers detected
11 *032617454-0011*	Rear Stairwell Window Sills	None Detected	
12 *032617454-0012*	Front Stairwell Floor	None Detected	
13 *032617454-0013*	Room 4 Floor	None Detected	
14 *032617454-0014*	Room 3 Tabletops	None Detected	
15 *032617454-0015*	Room 2 Toy Storage Shelving	None Detected	
16 *032617454-0016*	Room 1 Floor	None Detected	
17 *032617454-0017*	1st Floor Kids Bath Floor	None Detected	
18 *032617454-0018*	1st Floor Hallway Floor	None Detected	
19 *032617454-0019*	1st Floor Yellow Bath Heater/ Sills	**Chrysotile**	
20 *032617454-0020*	1st Floor Blue Bath Floor	**Chrysotile**	<4 asbestos fibers detected
21 *032617454-0021*	Boiler Room Stored Supplies	**Chrysotile**	
22 *032617454-0022*	STEM Room Tables/ Shelves	**Chrysotile**	
23 *032617454-0023*	Art Room Floor	**Chrysotile**	

EMSL Analytical, Inc.

10-39 45th Road Long Island City, NY 11101
Tel/Fax (212) 290-0051 / (212) 290-0058
http://www.EMSL.com / manhattanlab@emsl.com

EMSL Order: 032617454
Customer ID: ATC62
Customer PO: 11-81-0030
Project ID:

Attention: Brian Williams
Atlas Technical
73 William Franks Drive
West Springfield, MA 01089

Phone:
Fax: (413) 781-3734
Received Date: 10/26/2026 8:39 PM
Analyzed Date: 10/28/2026 - 10/29/2026
Collected Date: 10/26/2026

Project: 183COW2601/ Millbury Head Start/ 389 Millbury St., Worcester

Test Report: Qualitative Asbestos Analysis by Transmission Electron Microscopy (TEM) and Filtration Technique

24 *032617454-0024*	Basement - Bathroom Floor	**Chrysotile**
25 *032617454-0025*	Kitchen Food Prep Tables	None Detected

Analyst(s)

Azamat Mashukov 13 *Charles A. Johnson 12*

Charles Johnson, Laboratory Manager
or other Approved Signatory

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Samples analyzed by EMSL Analytical, Inc. Long Island City, NY

Report Amended: 10/29/2026 03:02 PM Replaces amended report from: 10/29/2026 01:41 PM Reason Code: Data Entry-Change to Location

ATLAS

Asbestos Bulk Sample Chain-of-Custody

032617454

Project Name: Millbury Head Start

Project Address: 389 Millbury St. Worcester

Project Number: 183COW2601

Project Manager: B. Williams

Sampled By: J. Levesque

Results To: B. Williams, J. Levesque, E. Kolodziej

Analysis Type: TEM Filtration Method Qualitative

Turnaround Time: 24 Hour

Date: 10/26/26

Positive Stop: Yes (No)

Special Instructions or Comments: Sample 7 should include "file cabinet and chair rail" in the location

Field ID	Sample Description	Location	Homogeneous Material
1	Dust Wipe	Room 8 Toy Storage Shelving	1
2		Room 7 Floor	2
3		Room 6 Floor	3
4		Room 5 Blue Play Table	4
5		2nd Floor Hall Office #1 Desk	5
6		2nd Floor Hall Office #2 Floor	6
7		2nd Floor Hall Office #3 File Cabinet	7
8		2nd Floor Kids Bath Countertop	8
9		2nd Floor Hall Floor	9
10		2nd Floor Main Office Floor	10
11		Rear Stairwell Window Sills	11
12		Front Stairwell Floor	12
13		Room 4 Floor	13
14		Room 3 Tabletops	14
15		Room 2 Toy Storage Shelving	15
16		Room 1 Floor	16
17		1st Floor Kids Bath Floor	17

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Relinquished By: [signature] Date: 10/26/26

Relinquished By: _____ Date: _____

Received By: William Peña Date: 10/26/26 8:39 pm

Received By: _____ Date: _____

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413.781.0070 | oneatlas.com

OrderID: 032617454

ATLAS

Asbestos Bulk Sample Chain-of-Custody

032617454

Project Name: Millbury Head Start

Project Address: 389 Millbury St Worcester

Project Number: 183COW2601

Project Manager: B. Williams

Sampled By: J. Levesque

Results To: B. Williams, J. Levesque, E. Kolodziej

Analysis Type: TEM Filtration Method Qualitative

Turnaround Time: 24 Hour

Date: 10/26/26

Positive Stop: Yes (No)

Special Instructions or Comments:

Field ID	Sample Description	Location	Homogeneous Material
18	Dust Wipe	1st Floor Hallway Floor	18
19		1st Floor Yellow Bath Heater/Sills	19
20		1st Floor Blue Bath Floor	20
21		Boiler Room Stored Supplies	21
22		STEM Room Tables/Shelves	22
23		Art Room Floor	23
24		Bsmt Bathroom Floor	24
25		Kitchen Food Prep Tables	25

EMSL LONG ISLAND CITY LAB RECEIVED 2026 OCT 26 P 8:39

Page 2 of 2

Relinquished By: _____ Date: 10/26/26

Received By: William Peña Date: 10/26/26 8:39 pm

Relinquished By: _____ Date: _____

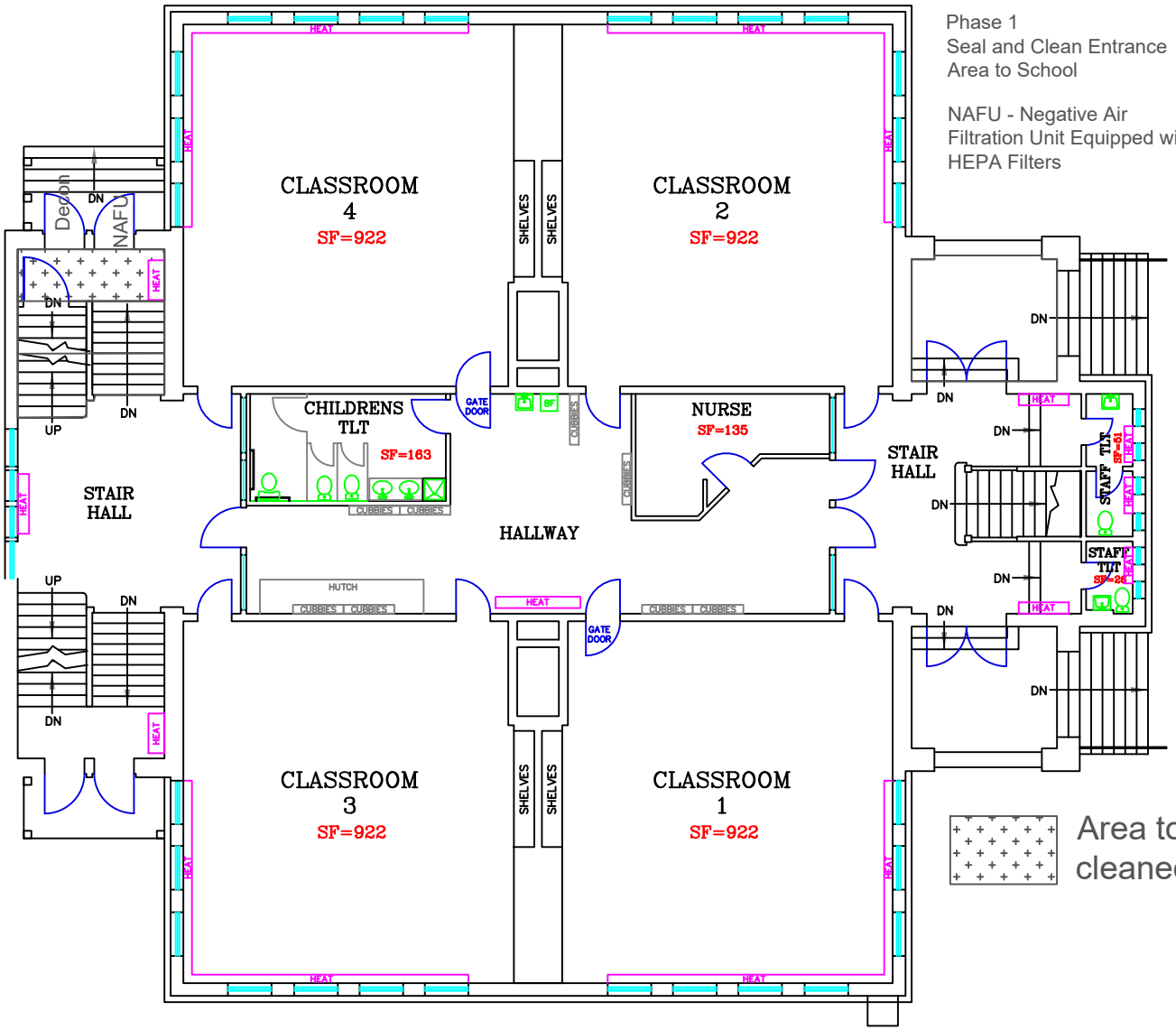
Received By: _____ Date: _____

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OrderID: 032617454

ATTACHMENT C

DIAGRAMS



ASBESTOS ABATEMENT DIAGRAM - FIRST FLOOR - PHASE I

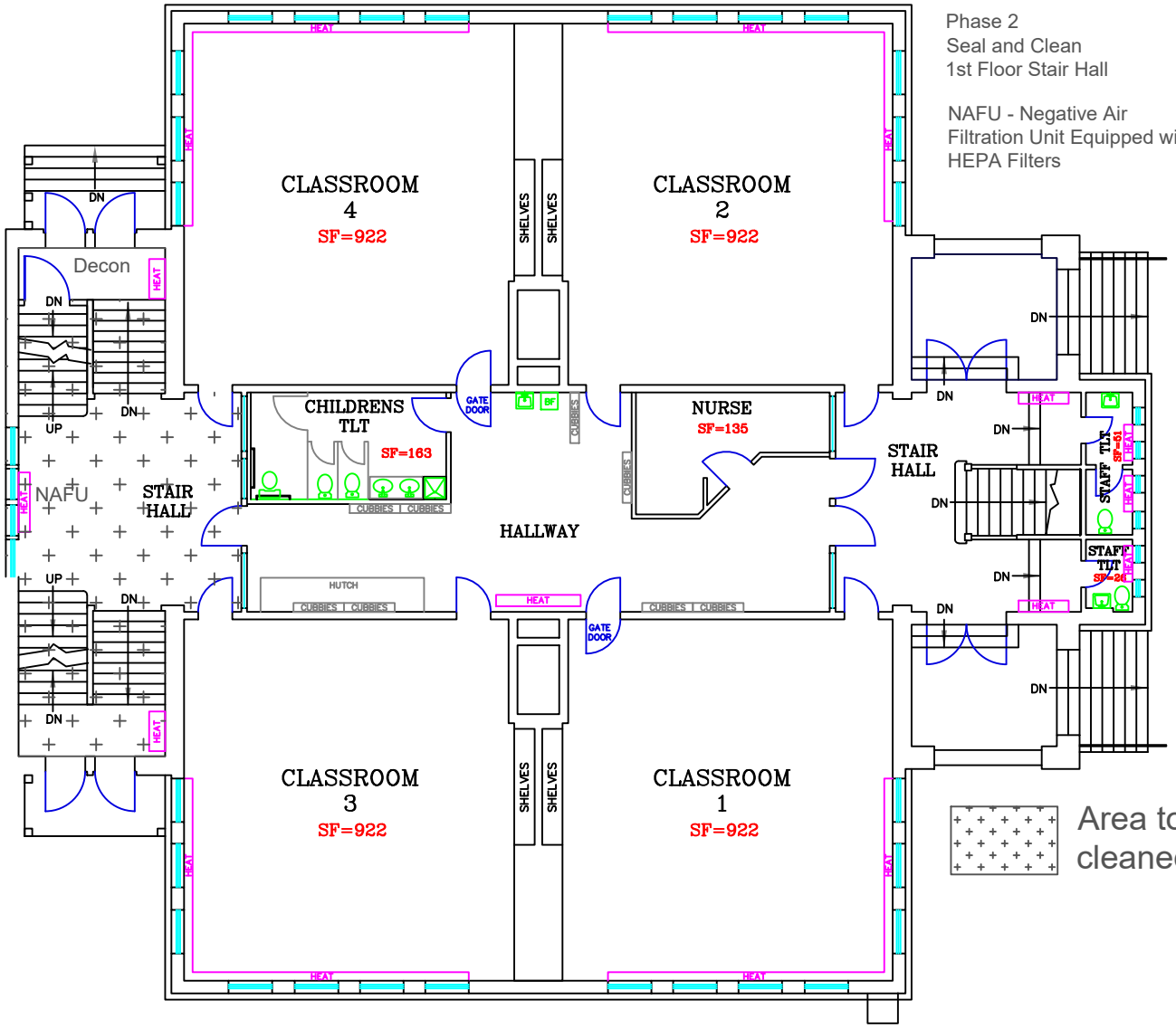
WORCESTER PUBLIC SCHOOLS
MILLBURY HEAD START
389 MILLBURY STREET
WORCESTER, MASSACHUSETTS

DRN. BY:	CKD. BY:	APP'D BY:	CKD. DATE:
EK	EK	EK	10/30/2026

PROJECT NUMBER:
DRAWING NUMBER: I
DATE: 10/30/2026
SCALE: NOT-TO-SCALE

ATLAS
ATLAS TECHNICAL CONSULTING SERVICES LLC
73 WILLIAM FRANKS DR.
W.SPRINGFIELD, MA 01089

FIGURE: 1



ASBESTOS ABATEMENT DIAGRAM - FIRST FLOOR - PHASE 2

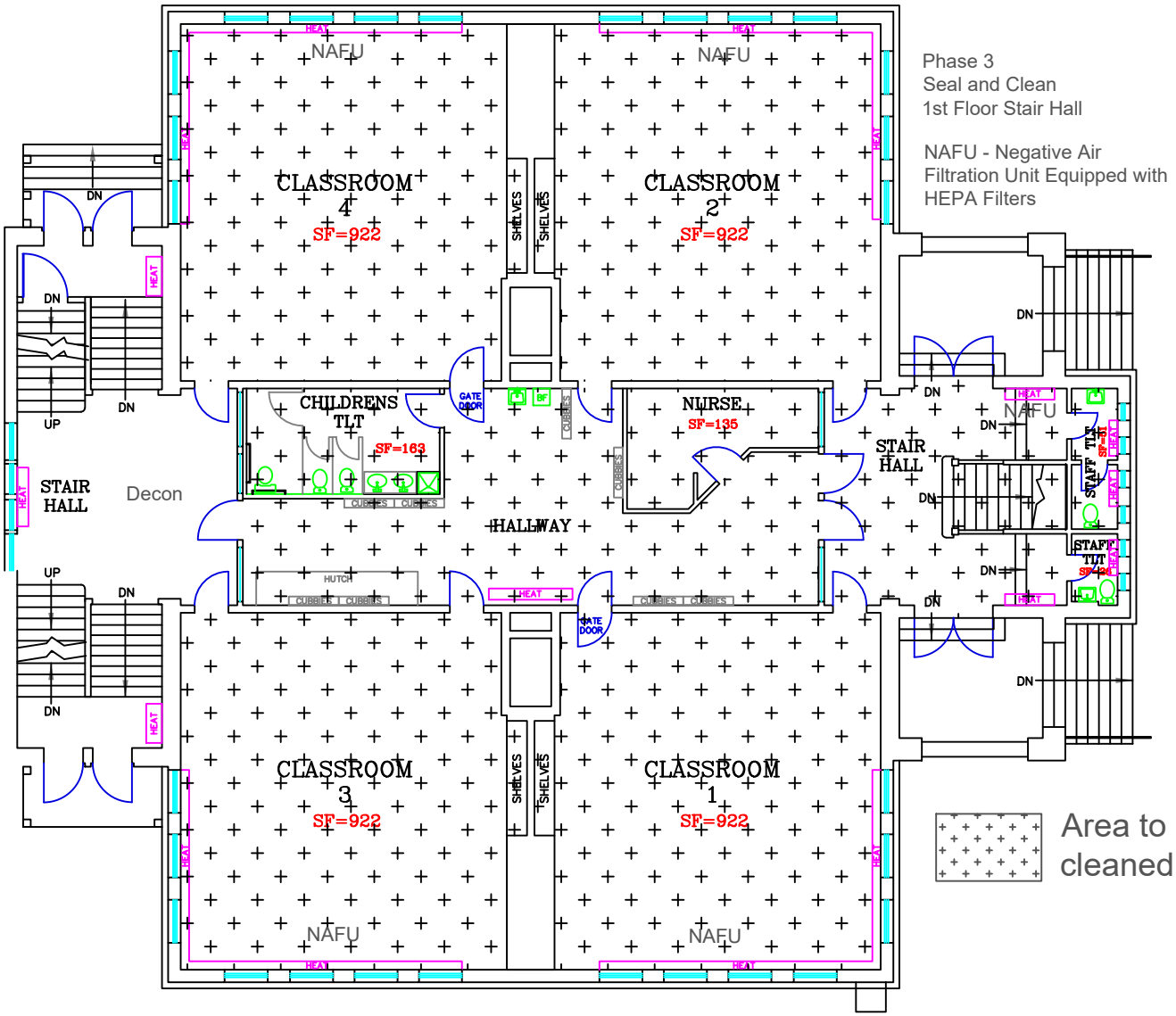
WORCESTER PUBLIC SCHOOLS
MILLBURY HEAD START
389 MILLBURY STREET
WORCESTER, MASSACHUSETTS

DRN. BY:	EK
CKD. BY:	EK
APP'D BY:	EK
CKD. DATE:	10/30/2026
PROJECT NUMBER:	
DRAWING NUMBER:	1
DATE:	10/30/2026
SCALE:	NOT-TO-SCALE

ATLAS

ATLAS TECHNICAL CONSULTING SERVICES LLC
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W.SPRINGFIELD, MA 01089

FIGURE: 2



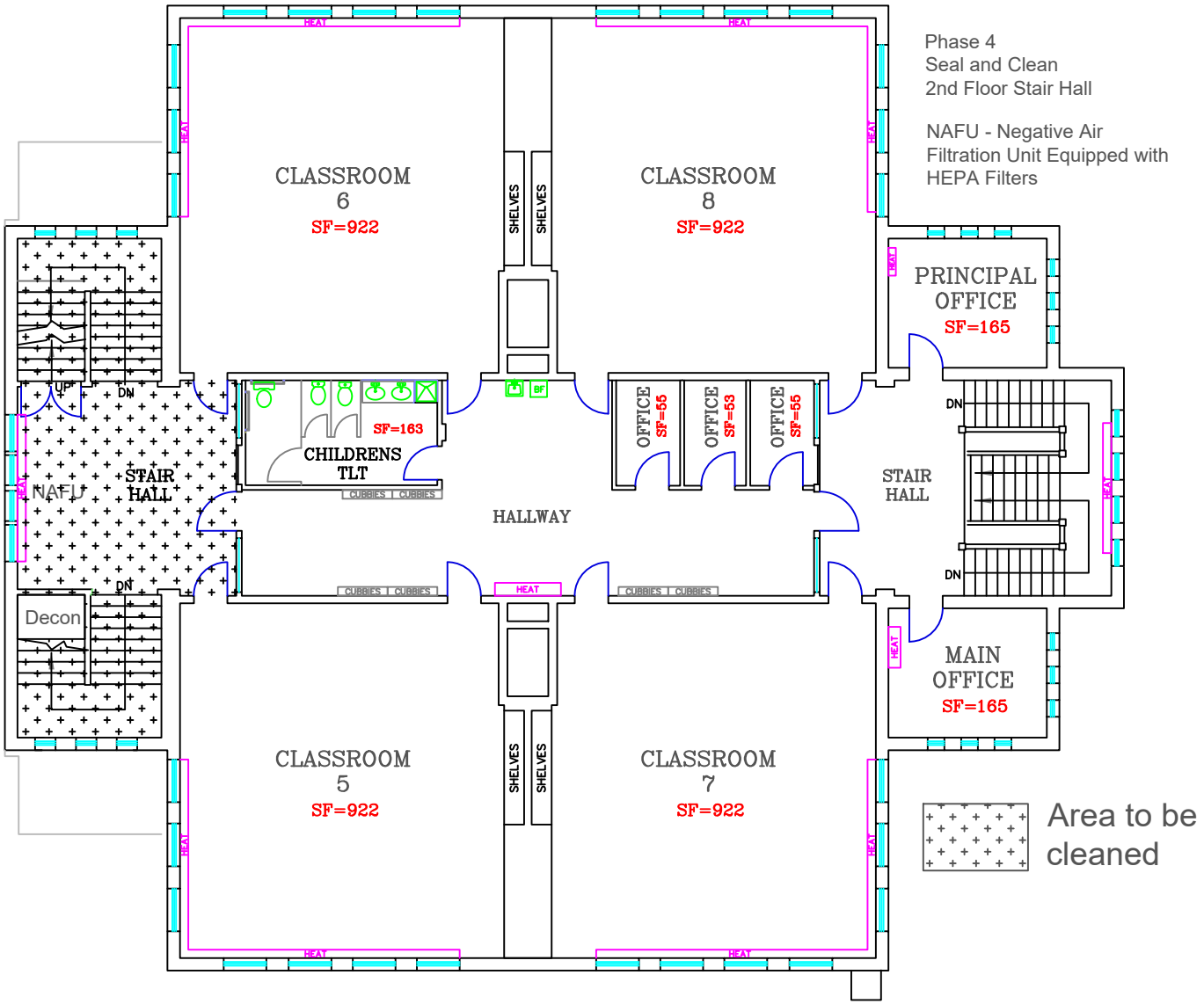
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CKD. BY:	EK
APP'D BY:	EK
CKD. DATE:	10/30/2026
PROJECT NUMBER:	
DRAWING NUMBER:	1
DATE:	10/30/2026
SCALE:	NOT-TO-SCALE

ASBESTOS ABATEMENT DIAGRAM - FIRST FLOOR - PHASE 3

WORCESTER PUBLIC SCHOOLS
MILLBURY HEAD START
389 MILLBURY STREET
WORCESTER, MASSACHUSETTS

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FIGURE: 3



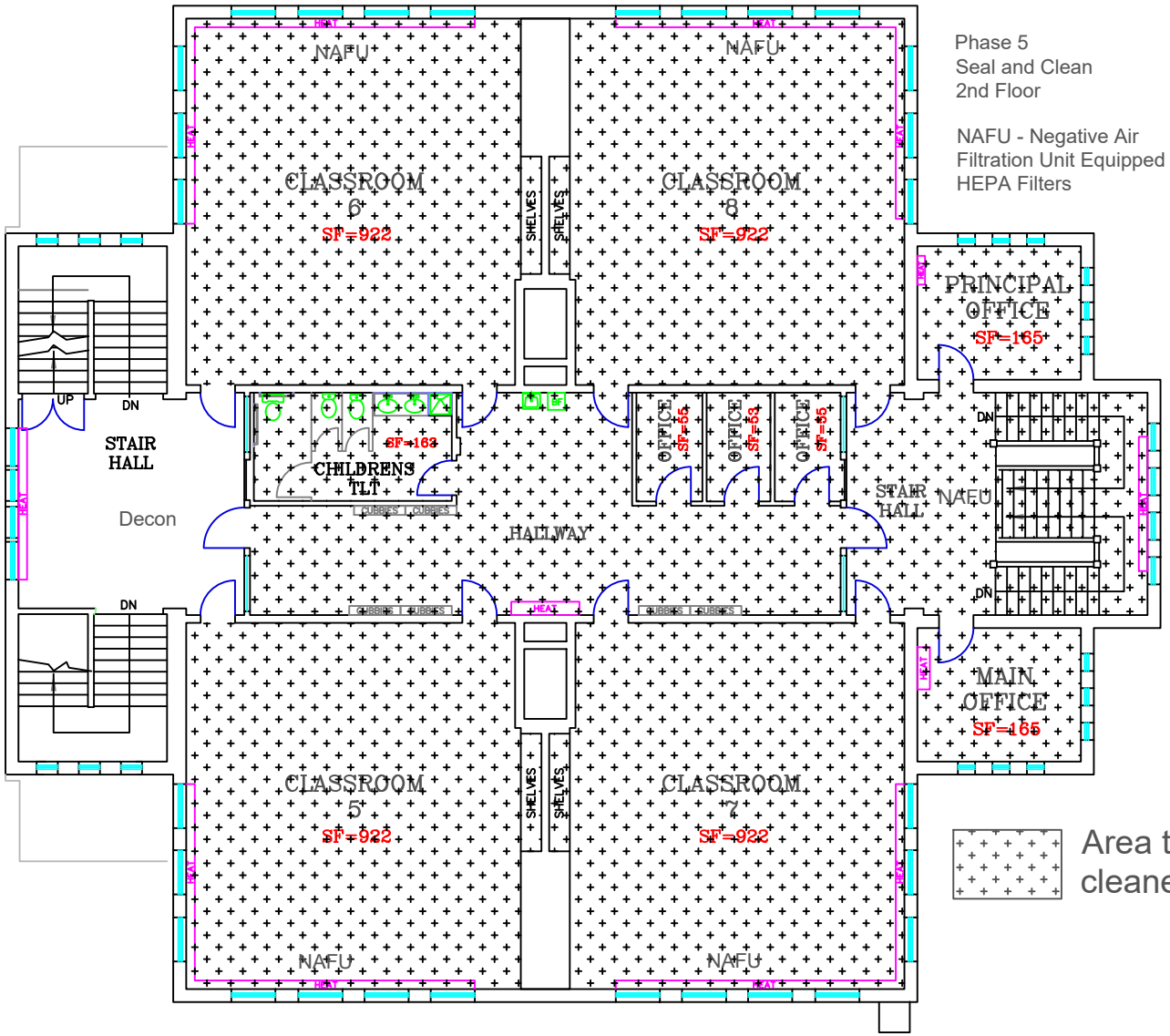
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CKD. DATE:	10/30/2026
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ASBESTOS ABATEMENT DIAGRAM - SECOND FLOOR - PHASE 4

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FIGURE: 4



Phase 5
Seal and Clean
2nd Floor

NAFU - Negative Air Filtration Unit Equipped with HEPA Filters

Area to be cleaned

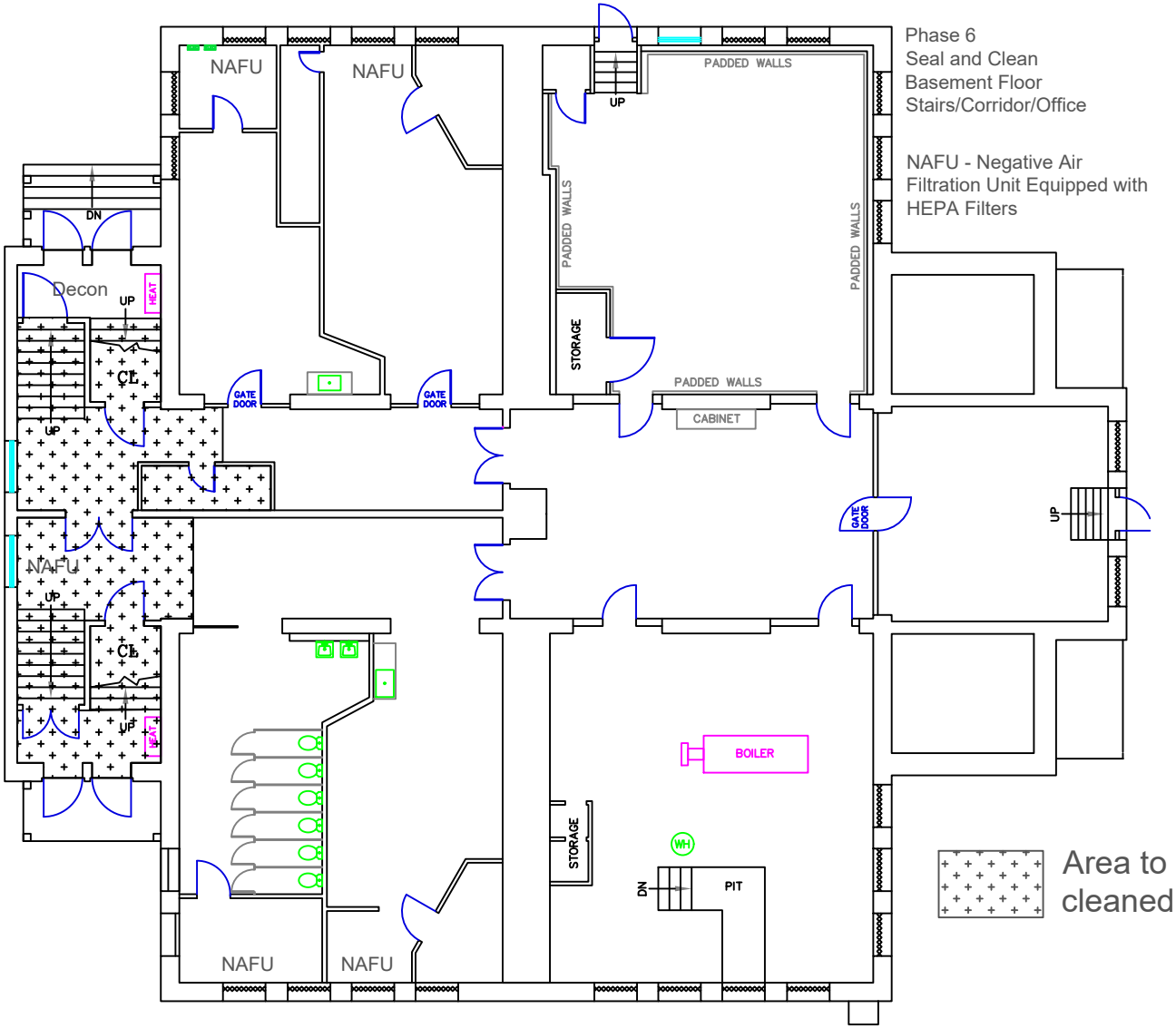
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CKD. BY:	EK
APP'D BY:	EK
CKD. DATE:	10/30/2026
PROJECT NUMBER:	
DRAWING NUMBER:	1
DATE:	10/30/2026
SCALE:	NOT-TO-SCALE

ASBESTOS ABATEMENT DIAGRAM - SECOND FLOOR - PHASE 5

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MILLBURY HEAD START
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WORCESTER, MASSACHUSETTS

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FIGURE: 5



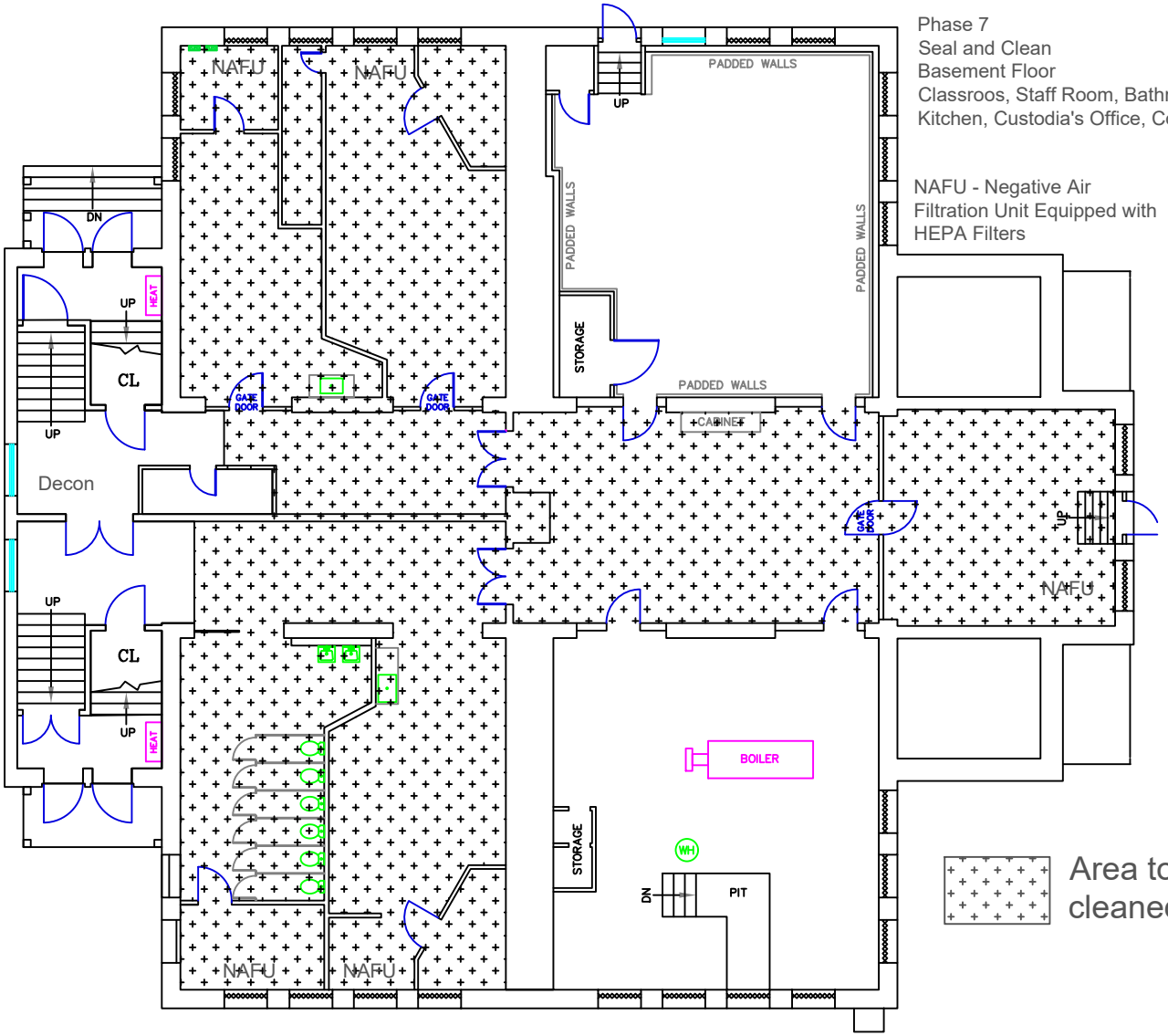
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APP'D BY:	EK
CKD. DATE:	10/30/2026
PROJECT NUMBER:	
DRAWING NUMBER:	1
DATE:	10/30/2026
SCALE:	NOT-TO-SCALE

ASBESTOS ABATEMENT DIAGRAM - BASEMENT - PHASE 6

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FIGURE: 6



Phase 7
Seal and Clean
Basement Floor
Classroos, Staff Room, Bathroom,
Kitchen, Custodia's Office, Corridors

NAFU - Negative Air
Filtration Unit Equipped with
HEPA Filters

Area to be cleaned

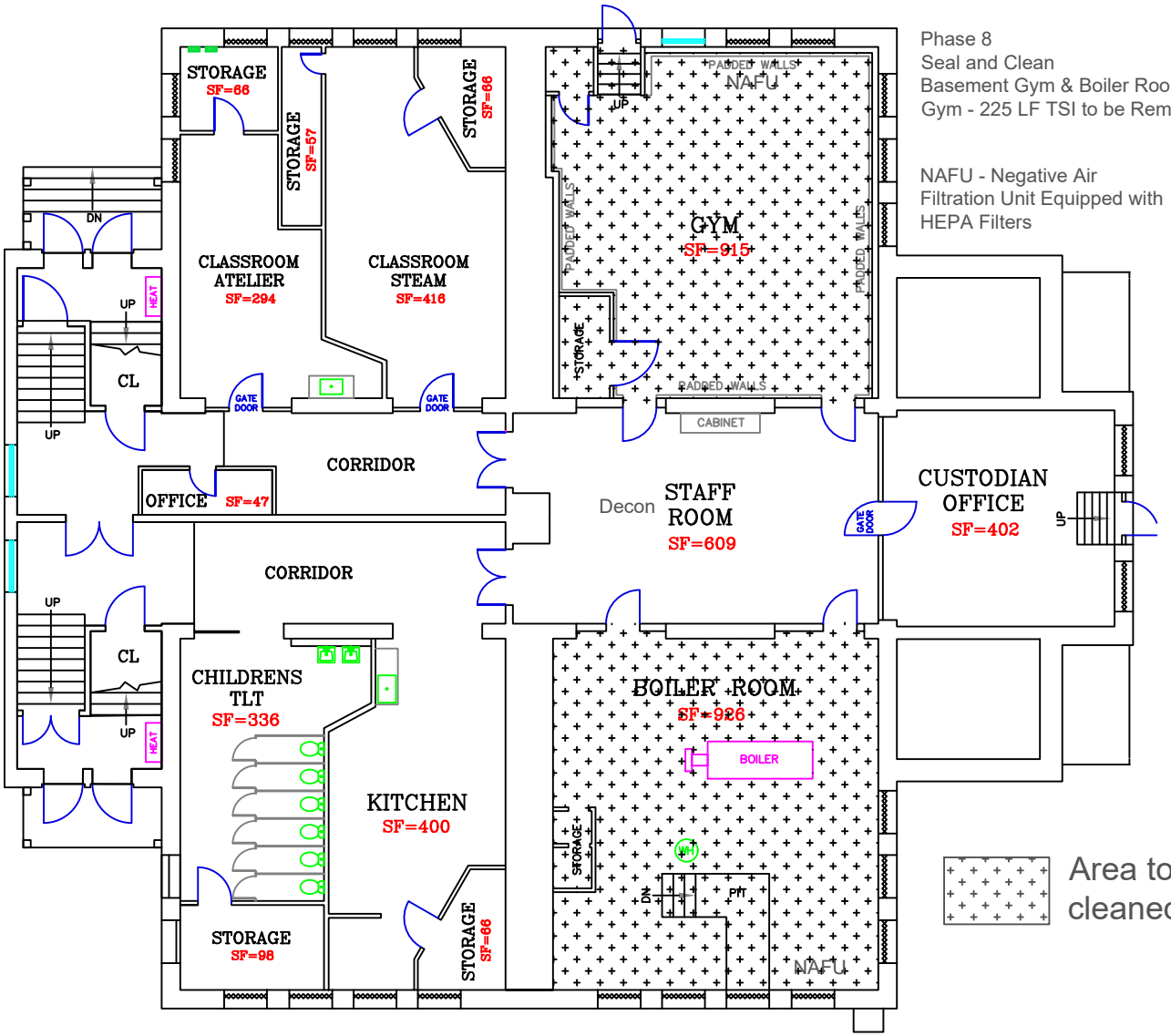
ASBESTOS ABATEMENT DIAGRAM - BASEMENT - PHASE 7

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DRAWING NUMBER:	1
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FIGURE: 7



Phase 8
Seal and Clean
Basement Gym & Boiler Room
Gym - 225 LF TSI to be Removed

NAFU - Negative Air Filtration Unit Equipped with HEPA Filters

Area to be cleaned

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DRAWING NUMBER: 1
DATE: 10/30/2026
SCALE: NOT-TO-SCALE

ASBESTOS ABATEMENT DIAGRAM - BASEMENT - PHASE 8

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FIGURE: 8