

Blackstone Environmental Solutions, LLC

Environmental Consulting and Licensed Site Professional Services

Andrew Danikas
Bureau of Air and Waste Division
MassDEP Northeast Regional Office
150 Presidential Way
Woburn, MA 01801

December 14, 2023
Project #1843

RE: Asbestos Testing Results

Vacant Parcels
12 Cedar Road, 14 Cedar Road, 14 Barnes Road, and 16 Barnes Road
Salem, MA 01970
RTN 3-38210

Dear Mr. Danikas:

Blackstone Environmental Solutions LLC (BES) on behalf of JL Realty Trust, JMI Realty Trust, and Barnes Road Trust (i.e., the “Trusts”) is providing the attached Asbestos Testing Results submittal associated with soil and debris samples collected from the above referenced properties. These properties are part of a Massachusetts Department of Environmental Protection (MassDEP) Disposal Site reported under Release Tracking Number 3-38210, and include portions of the properties at 9 Cedar Road, 12 Cedar Road, 14 Cedar Road, 15 Cedar Road, 16 Cedar Road, 14 Barnes Road, and 16 Barnes Road. This report has been prepared in response to a directive issued to the Trusts on October 13, 2023 by the MassDEP Bureau of Waste Site Cleanup (BWSC) and Bureau of Air and Waste (BAW) divisions to perform an asbestos assessment at the Disposal Site. MassDEP identified historic use of the Disposal Site as a dumping/landfill area for solid waste, neighboring asbestos cleanup properties, as well as a positive detection of asbestos containing material (ACM) in a floor tile debris sample collected by the MassDEP at 16 Barnes Road on August 28, 2023 as technical justification for issuing this asbestos assessment directive.

On behalf of the Trusts, Axiom Partners, Inc. of Lynnfield, MA (Axiom) has prepared the attached Asbestos Testing Results for areas of the Disposal Site where potential ACM debris material was visually observed and/or previously confirmed by laboratory analytical results. The debris material and soil sampling activities were performed by Axiom on November 13 and 14, 2023. A summary of findings outlined in the Asbestos Testing Results are noted below:

- No evidence of friable asbestos-containing materials was observed by Axiom’s state-certified licensed asbestos inspector at the Disposal Site;
- The floor tile debris pile sample at 16 Barnes Road was confirmed via laboratory analysis to contain non-friable asbestos. None of the other 6 analyzed debris material samples collected at the Disposal Site tested positive for asbestos; and
- Asbestos was detected in 4 of the 12 analyzed soil samples collected from within the Disposal Site.

Blackstone Environmental Solutions, LLC
76 Bay View Drive Shrewsbury MA 01545
(508) 612-4738 · www.bes-env.com

Axiom is recommending further assessment of soil and potential asbestos containing material be performed at this time in order to define the full extent of impact at the Disposal Site. It should be noted that the Trusts' have no immediate plans to generate any remediation waste at the Disposal Site.

This report is also being electronically filed with the MassDEP- BWSC Program under BWSC 126 Transmittal form for RTN 3-38210. If you have any questions regarding this submittal, please feel free to contact the undersigned.

Sincerely,
Blackstone Environmental Solutions, LLC



Michael C. Bricher, LSP, P.G.
Principal

CC: Kathleen Ingemi, 381 Highland Avenue, Salem, MA 01970
Jamy Buchanan Madeja, Esq., Buchanan & Associates
Board of Health, City of Salem, Public Health Agent, Mr. David Greenbaum, RS.
dgreenbaum@Salem.com
City Solicitor, Elizabeth Rennard, City Hall, 93 Washington Street, Salem, MA 01970
brennard@salem.com

**MAIN OFFICE:**

50 Salem Street, Suite 103B
Lynnfield, MA 01940
(781) 213-9198

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46 Watergate Lane
W Barnstable, MA 02668
(508) 746-5218

10 Diamond Drive
Derry, NH 03038
(603) 434-5245

www.axiomenv.com

December 8, 2023

Kathleen Ingemi
JMI Realty Trust, JL Realty Trust, Barnes Road Trust
381 Highland Avenue
Salem, MA 01970

VIA EMAIL

AXIOM Project # 01137.247

RE: Asbestos Testing, Ingemi Property, 12 Cedar Road, 14 Cedar Road, 14 Barnes Road and 16 Barnes Road, Salem, Massachusetts

Dear Ms. Ingemi,

At your request, Axiom Partners, Inc., (AXIOM) performed bulk sampling of suspect asbestos-containing materials (ACM) at the above-referenced property. AXIOM also collected samples of soil adjacent to locations of suspect ACM observed throughout the site. Sampling of suspect ACM and soil was performed on November 13 and 14, 2023, by Massachusetts-licensed Asbestos Inspector David Rooney (License #AI 061851). Asbestos was detected in one bulk sample and four soil samples collected at the site.

Bulk and soil samples were collected using hand tools and immediately placed in labeled containers (e.g., Whirlpak™ sample bags) which were assigned a unique sample number and sealed for submission to the laboratory for analysis. The samples were hand-delivered to Massachusetts-licensed laboratory EMSL Analytical, Inc. (EMSL) located in Woburn, Massachusetts (License #AA000188). Results are as follows, and the laboratory reports can be found as attachments.

Table 1
Suspect Building Debris

Material	Location(s)	Sample No. Reference	Analytical Results ¹
Epoxy Coating Debris	Between Stakes #16 and #17	111322-22-01A	1 @ NAD
Terracotta Masonry Unit Debris	By Stake #16 & #4	111322-22-03A&B	2 @ NAD
Paper Debris	By Stake #19	111322-22-04A	1 @ NAD
Mortar on Red Brick Debris	By Stake #10 & #3	111322-22-05A&B	2 @ NAD

¹NAD = No Asbestos Detected; CHR = Chrysotile Asbestos; SNA = Sample Not Analyzed

Material	Location(s)	Sample No. Reference	Analytical Results ¹
Suspect Debris	By Stake #14 & #13	111322-22-06A&B	2 @ NAD
Black Mastic on Concrete & Tile	16 Barnes Rd 01	111322-22-07A&B	2 @ NAD
White Floor Tile w/ Blue Flecks	16 Barnes Rd 01	111322-22-08A	1 @ 8% CHR

State and Federal regulations define an asbestos-containing material (ACM) as any material which contains greater than or equal to 1% asbestos. Based on this testing, the sample of white floor tile w/blue flecks is a regulated ACM. Observations by the onsite asbestos inspector classified the floor tile as a non-friable material. No evidence of friable asbestos-containing materials was observed at the site.

Table 2
Soil Adjacent to Building Debris

Material	Location(s)	Sample No. Reference	Analytical Results ²
Soil at 1" Deep / Epoxy Coating Debris	Between Stakes #16 and #17	111322-22-02A	Asbestos Detected
Soil at 1" Deep / Terracotta Masonry Unit Debris	By Stake #16	111322-22-02B	Asbestos Detected
Soil at 1" Deep / Paper Debris	By Stake #19	111322-22-02C	No Asbestos Detected
Soil at 1" Deep / Mortar on Red Brick Debris	By Stake #10	111322-22-02D	No Asbestos Detected
Soil at 1" Deep / Red Brick Debris	By Stake #11	111322-22-02E	No Asbestos Detected
Soil at 1" Deep / Suspect Debris	By Stake #14	111322-22-02F	Asbestos Detected
Soil at 1" Deep / Suspect Debris	By Stake #13	111322-22-02G	No Asbestos Detected
Soil at 1" Deep / Black Mastic on Concrete & Tile	16 Barnes Rd 01	111322-22-02H	No Asbestos Detected
Soil at 1" Deep / Mortar on Red Brick Debris	By Stake #3	111322-22-02J	No Asbestos Detected
Soil at 1" Deep / Terracotta Masonry Unit Debris	By Stake #4	111322-22-02K	No Asbestos Detected
Soil at 1" Deep / CMU Debris	By Stake #8	111322-22-02L	Asbestos Detected
Soil at 1" Deep / Red Brick Debris	By Stake #28	111322-22-02M	No Asbestos Detected

²NAD = No Asbestos Detected; CHR = Chrysotile Asbestos; SNA = Sample Not Analyzed

Ms. Kathy Ingemi
December 8, 2023
Page 3

12 & 14 Cedar Road, 14 & 16 Barnes Road
Salem, Massachusetts
Axiom Project # 01137.247

Based on this testing, the soil samples collected at Stakes #8, 14, 16 & 17 contain asbestos. AXIOM recommends additional assessment in the locations of positive asbestos soil sample locations to further delineate the asbestos contaminated soil. AXIOM also recommends that a copy of this report be forwarded to the Massachusetts Department of Environmental Protection (MADEP) – Bureau of Air and Waste for their review and comment.

Please call us if you have any questions or require additional assistance.



Christopher M. LaPorte
Project Manager



Stephen E. Minassian
Principal

Appendix A Asbestos Bulk Sample Results
Appendix B Sample Location Drawing

APPENDIX A
Asbestos Bulk Sample Results



EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

Tel/Fax: (781) 933-8411 / (781) 933-8412

<http://www.EMSL.com> / bostonlab@emsl.com

EMSL Order: 132307411

Customer ID: AXIO80

Customer PO:

Project ID:

Attention: David A. Rooney

Axiom Partners, Inc.

50B Salem Street, Suite 103

Lynnfield, MA 01940

Phone: (603) 505-5877

Fax: (781) 213-6992

Received Date: 11/14/2023 4:10 PM

Analysis Date: 11/20/2023

Collected Date: 11/13/2023

Project: 01137.247 - Ingemi Site Assessment; 16 Barnes Road; Salem, MA

Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos % Type
			% Fibrous	% Non-Fibrous	
111323-22-01A <small>132307411-0001</small>	Between Stakes #16 and #17 - Epoxy Coating Debris	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-03A <small>132307411-0002</small>	by Stakes #16 - Terracotta Masonry Unit Debris	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-03B <small>132307411-0003</small>	by Stakes #4 - Terracotta Masonry Unit Debris	Red Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-04A <small>132307411-0004</small>	by Stakes #19 - Paper Debris	Brown/Black Fibrous Homogeneous	90% Cellulose	10% Non-fibrous (Other)	None Detected
111323-22-05A <small>132307411-0005</small>	by Stakes #10 - Mortar on Red Brick Debris	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-05B <small>132307411-0006</small>	by Stakes #3 - Mortar on Red Brick Debris	Gray Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-06A <small>132307411-0007</small>	by Stakes #14 - Suspect Debris	Brown/Gray/Black Fibrous Homogeneous	18% Cellulose	82% Non-fibrous (Other)	None Detected
111323-22-06B <small>132307411-0008</small>	by Stakes #13 - Suspect Debris	Brown/Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-07A <small>132307411-0009</small>	16 Barnes Road 01 - Mastic assoc. w. 08A	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-07B <small>132307411-0010</small>	16 Barnes Road 01 - Mastic on Concrete Debris	Black Non-Fibrous Homogeneous		100% Non-fibrous (Other)	None Detected
111323-22-08A <small>132307411-0011</small>	16 Barnes Road 01 - Floor Tile - White w. Blue Flecks	Gray Fibrous Homogeneous		92% Non-fibrous (Other)	8% Chrysotile



EMSL Analytical, Inc.

5 Constitution Way, Unit A Woburn, MA 01801

Tel/Fax: (781) 933-8411 / (781) 933-8412

<http://www.EMSL.com> / bostonlab@emsl.com

EMSL Order: 132307411

Customer ID: AXIO80

Customer PO:

Project ID:

Analyst(s)

Ramon Buenaventura (11)

Steve Grise, Laboratory Manager
or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and met method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 600/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1993 ("final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

Samples analyzed by EMSL Analytical, Inc. Woburn, MA NVLAP Lab Code 101147-0, CT PH-0315, MA AA000188, RI AAL-139, VT AL998919, ME LB-0039

Initial report from: 11/20/2023 08:33:30

[illegible]

Time:

Page 1 Of 1

**EMSL Analytical, Inc.**

5 Constitution Way, Unit A, Woburn, MA 01801

Phone/Fax: (781) 933-8411 / (781) 933-8412

<http://www.EMSL.com>bostonlab@emsl.com

EMSL Order: 132307392

CustomerID: AXIO80

CustomerPO:

ProjectID:

Attn: **Geoff Gerace**
Axiom Partners, Inc.
50B Salem Street, Suite 103
Lynnfield, MA 01940

Phone: (781) 213-9198
Fax: (781) 213-6992
Received: 11/14/2023 04:10 PM
Analysis Date: 11/21/2023
Collected: 9/22/2023

Project: 01137.247 - Ingemi Site Assessment; 16 Barnes Road; Salem, MA

Test Report: Qualitative Asbestos Analysis of Soils via AHERA Method 40CFR 763 Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy

Sample	Description	Appearance	Result	Notes
111323-22-02A 132307392-0001	Between Stakes #16 and #17 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	Chrysotile	
111323-22-02B 132307392-0002	by Stake #16 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	Chrysotile	
111323-22-02C 132307392-0003	by Stake #19 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	
111323-22-02D 132307392-0004	by Stake #10 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	
111323-22-02E 132307392-0005	by Stake #11 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	
111323-22-02F 132307392-0006	by Stake #14 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	Chrysotile	
111323-22-02G 132307392-0007	by Stake #13 - Soil at 1" Deep		Not Submitted	
111323-22-02H 132307392-0008	16 Barnes Road 01 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	

Analyst(s)

Kevin McKenzie (11)


Steve Grise, Laboratory Manager
or other approved signatory

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Samples analyzed by EMSL Analytical, Inc. Woburn, MA

Initial report from 11/21/2023 15:19:58

**EMSL Analytical, Inc.**

5 Constitution Way, Unit A, Woburn, MA 01801

Phone/Fax: (781) 933-8411 / (781) 933-8412

<http://www.EMSL.com>bostonlab@emsl.com

EMSL Order: 132307392

CustomerID: AXIO80

CustomerPO:

ProjectID:

Attn: **Geoff Gerace**
Axiom Partners, Inc.
50B Salem Street, Suite 103
Lynnfield, MA 01940

Phone: (781) 213-9198
Fax: (781) 213-6992
Received: 11/14/2023 04:10 PM
Analysis Date: 11/21/2023
Collected: 9/22/2023

Project: 01137.247 - Ingemi Site Assessment; 16 Barnes Road; Salem, MA

Test Report: Qualitative Asbestos Analysis of Soils via AHERA Method 40CFR 763
Subpart E Appendix E supplemented with EPA 600/R-93/116 using Polarized Light
Microscopy

Sample	Description	Appearance	Result	Notes
111323-22-02J 132307392-0009	by Stake #3 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	
111323-22-02K 132307392-0010	by Stake #4 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	
111323-22-02L 132307392-0011	by Stake #8 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	Chrysotile	
111323-22-02M 132307392-0012	by Stake #28 - Soil at 1" Deep	Brown Non-Fibrous Homogeneous	None Detected	

Analyst(s)

Kevin McKenzie (11)

Steve Grise, Laboratory Manager
or other approved signatory


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Samples analyzed by EMSL Analytical, Inc. Woburn, MA

Initial report from 11/21/2023 15:19:58

Asbestos Bulk Sample - Chain of Custody Form

132307392

	AXIOM PARTNERS 50 SALEM ST., SUITE 103B LYNNFIELD, MA 01940 PHONE: 781.213.9198	Project Number: <u>01137.247</u>	
		Turnaround Time: <input type="checkbox"/> Same Day <input type="checkbox"/> 24 hrs <input type="checkbox"/> 48 hrs <input checked="" type="checkbox"/> 5-Day <input type="checkbox"/> Other _____	
Sampled by:	David A. Rooney (AI061851)	Date Collected:	09/22/23
Project Name:	Ingemi Site Assessment	Project Site:	16 Barnes Rd Salem MA
Special Lab Instructions:	<input type="checkbox"/> Positive Stop <input type="checkbox"/> DNA = Do Not Analyze <input type="checkbox"/> Other _____		
Type of Asbestos Analysis Requested:	<input type="checkbox"/> PLM/EPA 600/R-93/116 <input type="checkbox"/> PLM Point Count <input type="checkbox"/> PLM/NOB <input type="checkbox"/> TEM/NOB <input checked="" type="checkbox"/> PLM/SOIL Qualitative		
Email Results To:	ggerace@axiomenv.com , gdole@axiomenv.com		

SAMPLE NO.	SAMPLE DESCRIPTION	SAMPLE LOCATION	COMMENTS
111323-22-02A	Soil at 1" Deep	Between Stakes #16 and #17	
111323-22-02B	Soil at 1" Deep	By Stake #16	
111323-22-02C	Soil at 1" Deep	By Stake #19	
111323-22-02D	Soil at 1" Deep	By Stake #10	
111323-22-02E	Soil at 1" Deep	By Stake #11	
111323-22-02F	Soil at 1" Deep	By Stake #14	
111323-22-02G	Soil at 1" Deep	By Stake #13	
111323-22-02H	Soil at 1" Deep	16 Barnes Rd 01	
111323-22-02J	Soil at 1" Deep	By Stake #3	
111323-22-02K	Soil at 1" Deep	By Stake #4	
111323-22-02L	Soil at 1" Deep	By Stake #8	
111323-22-02M	Soil at 1" Deep	By Stake #28	

Relinquished:



Date:

11.14.23

Time:

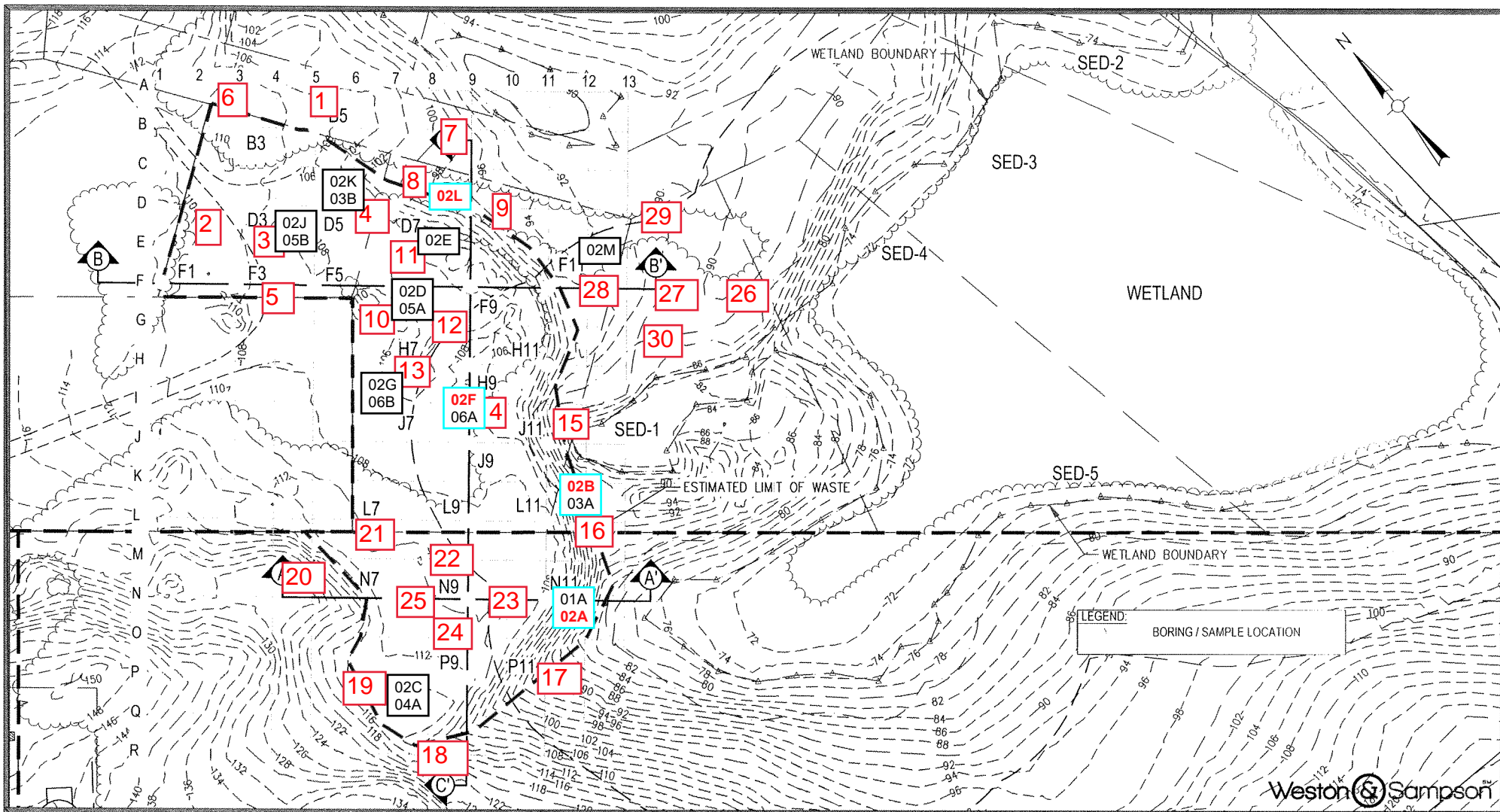
Received:

REC'D
EMSL-BOSTON
NOV 14 2023
wain in

Date:

Time:

APPENDIX B
Sample Location Drawing

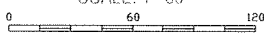


Weston & Sampson

- Proposed Surficial Soil
Sampling Location

02H
07A & B
08A
@ 16 Barnes Rd

FIGURE 1
OVERLOOK ACRES
SALEM, MA
SITE PLAN
SCALE: 1"=60'



DRAFT