

DATE: February 6, 2014

TO: Lana Fisher, Principal

SUBJECT: Bluebonnet ES - IAQ - Initial Contact report - Rooms 203 & 204

This is a follow-up to our conversation this morning 2/5. I received a phone call from Rick Wiley, about the teacher's concern over the leak in room 202. I inspected both rooms 202 & 203. There was not any other water intrusion, then the leak under the sink. After the repairs are made, I will have both rooms Air Tested. The Air Test will be done when the outside temperature is above 60 degrees, and there is no rain. I will have the Air Test results back to you within 48 hours after the tests. If you have any questions, please contact me.

Thanks,

Paul

Paul Siddall
Maintenance Energy Auditor (IAQ)
Facility Services
Lewisville ISD
469-446-8882

DATE: February 24, 2014

TO: Lana Fisher, Principal

SUBJECT: Bluebonnet ES - IAQ - Air Test Results - Room 202 & 203

On Wednesday 2/19, SWG Air tested the Rooms 202 & 203. It is typically assumed that indoor spore levels in an area with filtered or air conditioned air, and activity levels associated with schools average 10% to 40% of the outdoor levels. Data from the airborne fungi sampling indicated that the total indoor concentration of mold/fungi in the Room 202, was **49.1%** and Room 203, was **38.2%** of the outdoor levels. Utilizing this theory, the indoor concentrations are within the acceptable guidelines for Room 203, but not Room 202, for areas with filtered air or air conditioning. **Room 203 had 2 spores of Stachybotrys and Room 202 was above our acceptable levels. I am requesting Custodial to Steam Clean both of those rooms, on Friday night 2/28. We will retest those rooms next week, pending acceptable weather.** If you have any questions, please call me.

Thanks,
Paul

Paul Siddall
Maintenance Energy Auditor (IAQ)
Facility Services
Lewisville ISD
469-446-8882

Southwest GEOSCIENCE

2351 W. Northwest Hwy., Suite 3321
Dallas, Texas 75220
Ph: (214) 350-5469
Fax: (214) 350-2914

March 4, 2014

Lewisville Independent School District
340 Lake Haven
Lewisville, Texas 75057
Attn: Mr. Paul Siddall

Re: Limited Mold Assessment Services
Bluebonnet Elementary School
Rooms 202 and 203
200 Spinks Road
Flower Mound, Texas
SWG Project No. 0113H221A
LISD PO# P259674

Introduction

Southwest Geoscience (SWG) conducted limited mold assessment activities for the Lewisville Independent School District (Lewisville I.S.D.) within Bluebonnet Elementary School located at 200 Spinks Road in Flower Mound, Texas (hereinafter referred to as the "Site"). The investigation was limited to areas of the Site identified by Lewisville I.S.D. as described below. The assessment was performed by Mr. Clinton S. Jech, a State of Texas licensed Mold Assessment Consultant (License #MAT1075), on February 19, 2014. SWG's mold services definitions and limitations are included as an attachment to this report.

Investigation Areas

Lewisville I.S.D. identified the following physical portions of the Site as the target investigation areas ("Investigation Areas") for mold assessment: readily accessible areas within Rooms 202, and 203. SWG's mold assessment services were limited to the Investigation Area(s) identified by Lewisville, I.S.D. Additional areas or portions of the Site were out-of-scope and not included in SWG's mold assessment or this report at this time.

Scope of Work

As set forth in SWG's Mold Assessment Proposal No. P0114H070 dated February 10, 2014. SWG's scope-of-work was to provide visual and/or analytical mold assessment and related services in the Investigation Areas which included:

Visual Reconnaissance: SWG performed a visual reconnaissance of the Investigation Areas for visible indications of moisture intrusion (as indicated by staining or visible moisture) and/or suspect mold growth. SWG's visual reconnaissance only included readily accessible or visible portions of the Investigation Areas.

Suspect Mold Growth Sampling and Analysis: SWG collected limited ambient air samples for nonviable mold spores utilizing Air-O-Cell cassettes. "Air-O-Cell" refers to slit impaction air sampling cassettes manufactured by Zefon Analytical Accessories, St. Petersburg, Florida.

Site Reconnaissance Observations/Findings and Recommendations

SWG's Mold Assessment Site reconnaissance was performed on February 19, 2014 by Mr. Clinton S. Jech. SWG's visual reconnaissance of the Investigation areas revealed the following:

Temperature and Relative Humidity

Temperature readings collected inside the investigation areas ranged from 76.1 to 79.5 degrees Fahrenheit while relative humidity ranged from 41.6 to 45.6 percent. Temperature readings

collected outside the building ranged from 67.2 to 69.0 degrees Fahrenheit while outside relative humidity ranged from 66.0 to 69.2 percent.

Relative humidity is a measure of the moisture content of air and is closely tied to the comfort of the office/workplace temperature. As with temperature, there are no regulations governing acceptable office/workplace humidity ranges. Humidity levels in the office/work place are not only related to health effects, but also have operational impacts on modern office equipment.

Workplace/office temperatures have historically been considered a subjective factor because the perception of uncomfortable temperature levels is specific to each individual. There are no regulations governing acceptable office/workplace temperature ranges, but significant research has been conducted which indicates that there are temperature ranges that are not only comfortable but also result in optimum performance. ASHRAE (American Society of Heating, Refrigerating & Air Conditioning Engineers) has published guidelines describing thermal environmental conditions that at least 80% of the persons who occupy that environment will find acceptable or “comfortable.” Table I below explains the applicable limits and guidelines.

Relative Humidity	Winter Temperatures	Summer Temperatures
30%	68.5 to 76°F	74 to 80°F
40%	68.5 to 75.5°F	73 to 79.5°F
50%	68.5 to 74.5°F	73 to 79°F
60%	68 to 74°F	72.5 to 78°F

SWG utilized a Protimeter Moisture Measurement System (MMS) instrument (Model No. BLD2000) to measure and diagnose dampness in the drywall within random areas. The MMS is a battery powered handheld unit that is equipped with hydrostick probes to measure moisture content in wood, drywall and other and non-conductive materials. The device measures electrical conductivity of building materials and compares the conductivity readings to an internal, electronic standard reading for normal or “dry” materials.

Moisture content readings were obtained by pushing the moisture probe pins into surfaces. The measured values were then displayed on a colored scale depicting if the materials measured were normal (dry), higher than normal but not critical (at risk) or contained excessive moisture levels (wet). Based on the manufacturer’s guidelines, the instrument measurement values are described below:

< 5%	Out of Range
> 5% but < 16%	Normal
> 17% but < 20%	Higher than Normal but Not Critical
> 20%	Excessive Moisture Levels

Moisture meter readings taken from the walls within the investigations areas were reported as 9-15% which is considered normal by the manufacturer.

Air Monitoring Results

SWG collected four (4) samples from the interior of the building and two (2) samples from the exterior of the building. The microbial samples were analyzed by Steve Moody Micro Services, Inc. (SMMS) in Farmers Branch, Texas; SMMS is a State of Texas licensed mold analysis laboratory and accredited under the AIHA Laboratory Quality Assurance Program for Environmental Microbiology.

Room 202

Air testing performed using spore traps found that airborne mold spores in the room were considerably lower and were qualitatively similar to those measured outside of the building at the time the sampling was performed. Total fungal spore concentration within the investigation area was reported as 3,888 counts/m³, while the exterior level ranged from 7,346 to 7,917 counts/m³. However, the indoor spore levels exceeded 40% of the outdoor levels.

Four (4) types of mold were identified at a higher concentration within the investigation area as compared to the samples collected from the exterior of the building. Air sample(s) collected within the room reported *Alternaria* as 140 counts/m³ while exterior levels were reported as 67 counts/m³. *Curvularia* was reported as 40 and *Drechslera/Bipolaris* group was reported as 33 counts/m³ while no exterior levels were reported. *Myxomycete/Periconia/Rust/Smut* was reported as 233 counts/m³ while exterior levels were reported as 200 counts/m³.

Room 203

Air testing performed using spore traps found that airborne mold spores in the room were considerably lower and were qualitatively similar to those measured outside of the building at the time the sampling was performed. Total fungal spore concentration within the investigation area was reported as 3,021 counts/m³, while the exterior level ranged from 7,346 to 7,917 counts/m³.

Four (4) types of mold were identified at a higher concentration within the investigation area as compared to the samples collected from the exterior of the building. Air sample(s) collected within the room reported *Chaetomium* as 33 counts/m³ while exterior levels were reported as 27 counts/m³. *Epicoccum* and *Trichothecium* was reported as 13 counts/m³ while no exterior levels were reported. *Stachybotrys* was reported as 40 counts/m³ while exterior levels were reported as 13 counts/m³.

The American Conference of Governmental Industrial Hygienists (ACGIH) sets forth assessment criteria related to the “indoor/outdoor” relationship where the indoor air quality should be at or below that of outdoor air quality with regard to fungal spores (see ACGIH Bioaerosols, Assessment and Controls publication, 1999).

Suspect Mold

No visible mold was observed during the assessment. No odors or excessive dust were noted.

Conclusions and Recommendations

SWG recommends that the areas be cleaned and further testing/investigation be performed. If you have any questions regarding this report or if we can assist you with any other matter, please contact the undersigned at (214) 350-5469.

Sincerely,
Southwest Geoscience



Darren G. Bowden
Corporate Director
Industrial Hygiene Services
Texas Mold Assessment Consultant
Lic. No. MAC0321

Attachments: Analytical Results/Chain of Custody
Mold Services Definitions & Limitations/Standard of Care and Reliance

Analytical Results/Chain of Custody

IAQ Mold Report

Steve Moody Micro Services, LLC
 2051 Valley View Lane
 Farmers Branch, TX 75234 Phone: (972) 241-8460

Summary

DSHS License No.: LAB0117
 AIHA EMPAT ID: 102577

Client : Southwest Geoscience - Dallas, TX **Lab Job No.** 14F-02006
Project : Bluebonnet ES Rooms 202 and 203 **Report Date** 02/21/2014 2:29 PM
Project # : 0113H221A **Sample Date :** 02/19/2014
Sample Type: Spore Trap, Non-cultured **Spore Trap Type:** Zefon - Air-O-Cell
Test Method: Mold: ASTM D7391-09 - Standard Profile Page 1 of 2

On 2/19/2014, four (4) samples were submitted by Clint Jech of Southwest Geoscience - Dallas, TX (located at 2351 W NW Hwy #3321, Dallas, TX 75220) for Spore Trap, Non-cultured mold analysis. This report consists of three sections; a summary section, a data detail section, and an analytical notes section.

Sample Number	Volume (liters)	Sample Description	Identification	Concentration spores/cubic meter
1	75	Exterior, Southeast	Agaricus / Agrocybe Alternaria Ascospores Aspergillus / Penicillium Basidiospores Cladosporium Coprinus Hyphal / Spore Fragments Myxomycete / Periconia / Rust / Smut Stachybotrys <div style="text-align: right;">Total:</div>	280 53 453 1586 2519 2293 53 547 120 13 7917
2	75	Exterior, Southwest	Agaricus / Agrocybe Alternaria Ascospores Aspergillus / Penicillium Basidiospores Chaetomium Cladosporium Coprinus Hyphal / Spore Fragments Myxomycete / Periconia / Rust / Smut <div style="text-align: right;">Total:</div>	253 67 67 1226 1160 27 3666 120 560 200 7346

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Sample Number	Volume (liters)	Sample Description	Identification	Concentration spores/cubic meter
3	150	Room 202 * See Analytical Notes report for further details	Alternaria	140
			Ascospores	120
			Aspergillus / Penicillium	1000
			Basidiospores	374
			Cladosporium	1768
			Curvularia	40
			Drechslera / Bipolaris group	33
			Hyphal / Spore Fragments	180
			Myxomycete / Periconia / Rust / Smut	233
4	150	Room 203 * See Analytical Notes report for further details	Ascospores	60
			Aspergillus / Penicillium	507
			Basidiospores	1214
			Chaetomium	33
			Cladosporium	834
			Epicoccum	13
			Hyphal / Spore Fragments	280
			Myxomycete / Periconia / Rust / Smut	27
			Stachybotrys	40
			Trichothecium	13
			Total:	3021

Results may not be reported except in full. Data contained in this test report relates only to the samples tested. This report does not express or imply interpretation of the results contained herein. Interpretation should be made by a qualified professional.

Steve Moody Micro Services assumes no responsibility for the manner in which these samples were collected or handled prior to being received at this laboratory. SMMS assumes no responsibility for the qualifications of personnel performing sampling and/or interpretations of this data.

Analyst(s): Rob Greene

Lab Director: Bruce Crabb

Approved Signatory :



Thank you for choosing Steve Moody Micro Services

IAQ Mold Report

Steve Moody Micro Services, LLC
 2051 Valley View Lane
 Farmers Branch, TX 75234 Phone: (972) 241-8460

Data Detail

DSHS License No.: LAB0117
 AIHA EMPAT ID: 102577

Client : Southwest Geoscience - Dallas, TX **Lab Job No. :** 14F-02006
Project : Bluebonnet ES Rooms 202 and 203 **Report Date :** 02/21/2014 2:29 PM
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This report consists of three sections; a summary section, a data detail section, and an analytical notes section. Results may not be reported except in full.

Sample ID:	1			2			3			4		
Location:	Exterior, Southeast			Exterior, Southwest			Room 202			Room 203		
Debris Rating:	3			3			5			5		
Media Expires On:	Sep 2014			Sep 2014			Sep 2014			Sep 2014		
Notes Included?:												
Volume:	75			75			150			150		
	raw ct.	MDL	spores/m ³	raw ct.	MDL	spores/m ³	raw ct.	MDL	spores/m ³	raw ct.	MDL	spores/m ³
Agaricus / Agrocybe	21	13.33	280	19	13.33	253						
Alternaria	4	13.33	53	5	13.33	67	21	6.67	140			
Ascospores	34	13.33	453	5	13.33	67	18	6.67	120	9	6.67	60
Aspergillus / Penicillium	119	13.33	1586	92	13.33	1226	150	6.67	1000	76	6.67	507
Basidiospores	189	13.33	2519	87	13.33	1160	56	6.67	374	182	6.67	1214
Chaetomium				2	13.33	27				5	6.67	33
Cladosporium	172	13.33	2293	275	13.33	3666	265	6.67	1768	125	6.67	834
Coprinus	4	13.33	53	9	13.33	120						
Curvularia							6	6.67	40			
Drechslera / Bipolaris group							5	6.67	33			
Epicoccum										2	6.67	13
Hyphal / Spore Fragments	41	13.33	547	42	13.33	560	27	6.67	180	42	6.67	280
Memnoniella												
Myxomycete / Periconia / Rust / Smut	9	13.33	120	15	13.33	200	35	6.67	233	4	6.67	27
Stachybotrys	1	13.33	13							6	6.67	40
Trichothecium										2	6.67	13
TOTALS	594		7917	551		7346	583		3888	453		3021
Analyst	Rob Greene			Rob Greene			Rob Greene			Rob Greene		
Analysis Date	2/21/2014			2/21/2014			2/21/2014			2/21/2014		

Debris Rating Key:

- 0 - No debris detected.
- 1 - Trace debris.
- 2 - Light debris.
- 3 - Moderate debris.
- 4 - Substantial debris.
- 5 - Extensive debris.
- 6 - Field blank.

NOTE: Debris defined as skin, fibers, pollen grains, insect parts, and/or other non-fungal particles.

IAQ Mold Report

Steve Moody Micro Services, LLC
2051 Valley View Lane
Farmers Branch, TX 75234 Phone: (972) 241-8460

Analytical Notes

DSHS License No.: LAB0117
AIHA EMPAT ID: 102577

Client : Southwest Geoscience - Dallas, TX

Lab Job No. : 14F-02006

Project : Bluebonnet ES Rooms 202 and 203

Report Date : 02/21/2014 2:29 PM

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Test Method: Mold: ASTM D7391-09 - Standard Profile

Page 1 of 1

This report consists of three sections; a summary section, a data detail section, and an analytical notes section. Results may not be reported except in full.

Samples Analyzed

Sample No: 3 : Room 202

Notes: 75% Occluded.

Sample No: 4 : Room 203

Notes: 65% Occluded.

Field Blanks

No discernable field blanks were submitted with this set of samples.

NOTE: All remaining samples suitable for analysis.

Methods

Method: ASTM D7391-09: Categorization and Quantification of Airborne Fungal Structures in an Inertial Impaction Sample by Optical Microscopy.

Calculation: Spores/cubic meter = (Raw spore count)*(MDL)

Note: MDL (Minimum Detection Limit) is calculated based upon 1 raw spore count.

Steve Moody Micro Services recommends two significant figures for calculated values based on ASTM D7391-09.

This report must not be used by the customer to claim product certification, approval, or endorsement by AIHA, ISO, or any agency of the Federal Government.



LAB # 102577

Chain of Custody

Page 1 of 1



Lab Job # 14F-02006 ADC:4
 Lab Job # _____
 Lab Job # _____

Please call in advance for immediate, after-hour, & weekend pricing & availability.
 Turnaround of Culture Samples subject to Culture Growth

ASBESTOS PLM

Bulk 1 day 2 day 3 day 5 day Immediate
 Analyze All Positive Stop

PCM Air (7400) 1 day 2 day 3 day 5 day Immediate
TOTAL DUST (0500/0600) 1 day 2 day

MOLD

Non-culture (Tape / Bulk / Air) 1 day 2 day Immediate
 Air Standard Profile Air Expanded Profile
 Analyze Blanks Yes No
 Culture (Swab / Bulk / Plate) 7-14 day

OTHER: _____

ASBESTOS TEM

Air AHERA Method 6 hr 12hr 24 hr
 Air 7402 (Modified) 1 day 2 day 3 day
 Bulk/Wipe/Micro Vac 1 day 2 day 3 day
 Water 1 day 2 day 3 day
 Analyze Blanks Yes No

BACTERIA

Heterotrophic Plate Count (HPC) 3 day
 HPC + Gram Stain 3 day 5 day
 HPC + 3 Gram Neg ID 6-8 day
 HPC + 5 Gram Neg ID 6-8 day
 Fecal Coliform (MPN) 3 day
 Total Coliform & E Coli (P/A) 2-3 day

Billing Company / City: SWG Dallas # of Samples: 4
 Submitter's Company: _____ Sample Date: 2/19/2014
 Submitter's Name: Clinton S. Jech Project #: 0113H221A
 Project: Bluebonnet ES Rooms 202 & 203 Phone #: _____
 Contact Information: Name: Clinton S. Jech Mobile #: (972) 989-1631
 E-mail Results to: Clint/Darren/Veronica Fax #: _____
 Invoice Address: Veronica P.O. #: _____

— Please review paperwork and samples before submitting to Lab. Unsealed / improperly packaged / damaged / expired samples or excessive administrative requests may incur additional fees—

Notes: _____

Sample #	Sample Description	Vol. / Area if applicable	Location / Notes
1	Exterior, Southeast	75	T = 69.0° H = 66.0%
2	Exterior, Southwest	75	T = 67.2° H = 69.2%
3	Room 202	150	T = 76.1° H = 45.6% M = 9-15 % Ceilings = Ceiling Tile Walls = Drywall Floors = Carpet / Floor Tile
4	Room 203	150	T = 79.5° H = 41.6% M = 10-12% Ceilings = Ceiling Tile Walls = Carpet / Drywall Floors = Carpet / Floor Tile

Released By: <u>[Signature]</u>	Date / Time: <u>2/19/2014 1711</u>	Received By: <u>JC</u>	Date / Time: <u>2-19-14 5:11pm</u>
Released By: _____	Date / Time: _____	Received By: _____	Date / Time: _____

Mold Services Definitions & Limitations/
Standard of Care and Reliance

Mold Services Definitions & Limitations

"Mold" defined. Mold is a general term used to describe various types of single-celled naturally occurring biological organisms occurring worldwide. For purposes of this report (and the Texas Mold Assessment & Remediation Rules), the term "mold" is broadly defined to include any living or dead fungi or related products or parts, including spores, hyphae, and mycotoxins.

Limited Scope of Mold Assessment. The scope of SWG's mold assessment services as reflected in the Proposal and this report are limited in that (i) they were physically limited to certain portions of the building structure (e.g., the Client identified Investigation Areas); and (ii) limited by accessibility to building materials or components within the Investigation Area(s). In contrast to a Limited Assessment" is a comprehensive assessment, which involves destructive sampling methods and the scope of the assessment typically extending to the entire building structure.

Time sensitive. Mold assessments are essentially a "snap shot in time," and the results are only relevant at the time of site reconnaissance. Because mold, when biologically active, is a living organism, its presence is influenced and controlled by environmental conditions. Mold assessments, therefore, are "time sensitive" in that the presence and concentration of mold and similar organisms in building structures or in the air is directly influenced by environmental conditions (such as humidity, moisture, nutrients and substrates), whether natural or caused by man, which conditions may vary significantly over relatively short periods of time.

Methodologies. Currently, mold assessment methodologies and protocols in Texas are governed by persuasive guidelines (rather than promulgated federal/state or local regulations). Presently, there is no data that supports a threshold limit or dose-response relationship for exposure to mold aeroallergens, individual pathogens, opportunistic pathogens and/or mycotoxins. The Occupational Safety and Health Administration (OSHA), the National Institute of Occupational Safety and Health (NIOSH) and other non-governmental associations, have not yet established permissible exposure limits (PELs), recommended exposure limits (RELs), or other limit values for aeroallergens. Because no limit values presently exist, SWG will not and cannot represent that the site contains no harmful microbes, mold, fungi, or their metabolites, or other latent conditions beyond those identified by the limited scope of this mold assessment.

Findings limited. Findings from a limited mold assessment are limited because of the nature of the information obtained (e.g., visual reconnaissance of readily accessible areas of building structures, interview information, anecdotal information, and limited sampling data derived from one or more specific sampling events). SWG cannot warrant the accuracy of prior or subsequent information/data, reports and services performed by other firms at the Site. SWG assumes no responsibility or liability for errors in information or data provided by or through the client or third party sources. SWG's services are not to be construed as legal or medical interpretation or advice.

Moisture Intrusion Limitation. SWG performs mold assessment services and is not a moisture intrusion, HVAC, roofing, plumbing or building envelope specialist. However, during the course of conducting its mold assessment services, SWG will report observed areas of apparent moisture intrusion. SWG does not and will not investigate the cause or causes of such observed moisture intrusion. In the event apparent moisture intrusion is observed, SWG will recommend that the client contact a specialist (i.e., plumbing contractor, building envelope specialist, HVAC contractor, water intrusion specialist, etc.) to assist the client in determining the specific cause or causes of the moisture intrusion and remedial options.

Texas Licensing Requirements. SWG (and/or its personnel) will render the services set forth in this proposal in the capacity of a Texas licensed Mold Assessor. SWG is not licensed as a Mold Remediation Contractor and does not perform mold remediation. As of January 1, 2005, Texas law has required that Mold Assessors and Mold Remediation Contractors be licensed.

Mold Remediation Certificate. For mold remediation projects (above certain size thresholds), applicable Texas law (i.e., Texas Occupation Code Section 1958.54 and T.A.C. Section 295.397 (the Texas Mold Assessment and Remediation Rules), requires that a "Certificate of Mold Remediation" be issued by the Mold Remediation Contractor upon successful completion of the project. This certificate must be provided to property owners no later than the 10th day after the date on which the mold remediation is completed at a property. The Mold Remediation Certificate issued by the Mold Remediation Contractor must include a certification by the Mold Assessor that the mold remediation project has been successfully completed in accordance with the mold remediation protocol.

Be advised that SWG's issuance of a Mold Remediation Certificate upon successful completion of a Mold Remediation project does not mean, warrant or otherwise guarantee that mold will not be subsequently found in any portion of the Investigation Area or the Site. In the event that SWG is engaged to render services in connection with a mold remediation project, SWG will require *Client to provide to SWG a signed certificate prepared by Client's moisture intrusion specialist or appropriate contractor stating that all sources of moisture which resulted in the presence of mold in the Investigation Area have been fully remediated and corrected.*

Standard of Care

SWG performed its Services in accordance with generally accepted practices of the profession undertaken in similar services at the same time and in the same geographical area. No other warranties, expressed or implied, apply to the Services hereunder or this report.

Reliance

SWG's proposal for this project, services and this report have been prepared on behalf of and for the exclusive use of Lewisville Independent School District solely for their use and reliance in assessing the presence of mold in the Investigation Areas of the site. Lewisville Independent School District is the only party to which SWG explained the risks and limitations of the services and was solely involved in shaping the scope of services. Accordingly, reliance on this report by any other party may involve assumptions leading to an unintended interpretation of findings and opinions. With the consent of the client, SWG may offer reliance to third parties

or contract with other parties to develop findings and opinions related to such party's unique risk management concerns. Notwithstanding the foregoing, reliance by any and all third parties upon the proposal, the Services or this report shall be limited in the aggregate to all relying parties to the fair market value of the Services provided by SWG.
