Brunelle & Clark Consulting, LLC

ASBESTOS SURVEY
LEAD PAINT SAMPLING &
LEAD WASTE CHARACTERIZATION
FOR DEMOLITION OR RENOVATION OF THE
GARBERVILLE VETERANS BUILDING
483 CONGER STREET
GARBERVILLE, CA

January 8, 2021

Project # 2000311

Prepared for:
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1.0 PURPOSE

On December 20 & 22, 2020, this office conducted an asbestos survey, paint sampling for lead, and lead waste characterization sampling, for demolition or renovation of the Garberville Veterans Building located at 483 Conger Street, in Garberville, CA.

This site is subject to the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations concerning renovation and/or demolition activities (40 CFR, Part 61, Subpart M). This survey provides for compliance with NESHAP regulations.

The asbestos survey was also conducted to identify asbestos containing materials (ACM) pursuant to the requirements of the California Health & Safety Code, and for compliance with Cal/OSHA regulations (8 CCR 1529) for worker protection.

To provide for compliance with: the Cal/OSHA Lead in Construction Standard Title 8, CCR Section 1532.1; the California Code of Regulations Title 17, CCR 35000-36100; and the EPA Lead Renovation, Repair, and Painting Rule, 40 CFR Part 745; representative paint sampling was conducted using a portable X-ray fluorescence (XRF) paint analyzer.

For compliance with federal (40 CFR 260-262) and state (22 CCR 66262) hazardous waste regulations, lead waste characterization sampling/testing for the anticipated project demolition waste stream was also conducted.

The person completing this survey and report is certified through the Division of Occupational Safety & Health (DOSH) as an Asbestos Building Inspector and a Certified Asbestos Consultant (CAC), and is certified by the California Department of Public Health (CDPH) as a Lead Inspector/Assessor/Supervisor.

2.0 EXECUTIVE SUMMARY

The subject building is a large single-story wood framed structure, that sits on a perimeter foundation. The building has a flat roof with a parapet wall perimeter. The building contains six rooms, two restrooms, and a hallway. The exterior in finished with wood siding and trim, and torch down composition roofing. The interior has an open beam and fiberboard ceiling, and the walls

are finished with a combination of wood paneling and drywall. The floors are largely finished with hardwood and vinyl floor tile.

Asbestos Survey

The asbestos survey includes all suspect materials on the interior, exterior, and roof. During the asbestos survey, 82 bulk samples were collected from suspect materials, and submitted for laboratory analysis of asbestos content. Five (5) types of materials were found to contain asbestos.

The disturbance, abatement, and demolition of the materials containing asbestos will require compliance with the EPA NESHAP, and Cal/OSHA regulations regarding asbestos in construction.

Lead Paint Sampling

The paint sampling for lead includes representative sampling of interior and exterior building components. The paint sampling was conducted using a portable XRF (X-ray fluorescence) paint analyzer. The XRF paint analyzer was used to measure lead content in paint coatings of thirty-three (33) components. Most of the sampled components were found to be negative for detectable lead. Trace lead content was found on a few building components on the interior and exterior of the building, and Lead Based Paint (LBP) was identified as present in the glaze of the sinks and toilets in the restrooms.

The disturbance of any materials containing any amount of lead will require compliance with the Cal/OSHA Lead Construction Standard (Title 8 CCR 1532.1) for worker protection, and compliance with the California Code of Regulations Title 17, CCR 35000-36100.

Lead Waste Characterization

One representative sample of the "combined" anticipated demolition waste stream for the entire building to be demolished was collected, and submitted for lead waste characterization analyses.

Based on the analysis results, the anticipated demolition waste steam for the building is categorized as Non-Hazardous waste by both Federal and California criteria.

The characterized demolition waste can be disposed of as general "construction debris" at any accepting Class II or Class III landfill.

3.0 ASBESTOS SURVEY

During this survey, a total of eighty-two (82) bulk samples were collected from suspect materials and submitted for the laboratory analysis of asbestos content. A description of all samples, and sample locations are contained in Table 1, Appendix B. All sample locations are indicated on Figures 1-4, Appendix A.

The bulk samples were submitted to an NVLAP accredited laboratory, AmeriSci Richmond (Midlothian, VA) for the analysis of asbestos content by Polarized Light Microscopy (PLM) by

EPA 600/R-93/116, including requirements for EPA 600/M4-82-020 per 40 CFR 763. The sample Chain of Custody and Laboratory Report is contained in Appendix B. All the Asbestos analytic data are summarized in Table 1, Appendix B.

Five (5) types of materials tested positive for asbestos by the initial PLM analyses. Samples of one type of material were re-submitted for verification of the percent asbestos content by 400 Point Count analyses. The 400 Point Count analysis lab report is located at the end of the PLM lab report, and before the Chain of Custody form, Appendix B. The Point Count analysis data is summarized below.

400 Point Count Analyses

Sample ID#	Material	Initial PLM Result	Point Count Result
2011-8	Drywall joint compound	2% CH	0.8% CH on composite of JC/GB
2011-12	Drywall joint compound	2% CH	0.3% CH on composite of JC/GB

CH = Chrysotile Asbestos

Sample number 2011-27 (12"x12", gray vinyl floor tile) was found to be negative by PLM analysis, and was re-submitted for confirmation of the PLM results by Transmission Electron Microscopy (TEM) asbestos analysis by EPA 600/R-93/116. The sample was confirmed to be negative for asbestos. The Laboratory Reports and sample Chain of Custody form are contained in Appendix B, and the TEM lab report is located at the end of the PLM lab report, and before the Chain of Custody form.

Materials found to contain asbestos are divided into categories according to percentage and type of asbestos found in the materials, as defined below.

- ***Asbestos Containing Construction Materials (ACCM)*** contain asbestos in amounts between 0.1% and 1.0%.
- ***Asbestos Containing Materials (ACM)*** *are materials that contain >1% asbestos.*
- ***Presumed Asbestos Containing Material (PACM)*** *is material presumed to be >1% asbestos.*
- ***Regulated Asbestos Containing Materials (RACM)*** *refers to "regulated" ACM, a category of ACM that is subject to NESHAP regulation.*
- ***"Friable"*** *asbestos material is defined as: material containing >1% asbestos, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure.*

Asbestos was found present in five (5) building materials. The asbestos containing materials identified during this survey are listed by category below.

One material was found to be Asbestos Containing Construction Material (ACCM), as summarized below:

ACCM

- **Gypsum board/joint compound (drywall)**

Four surveyed materials are categorized as Asbestos Containing Material (ACM), three of which are summarized below. One material, described further below, is categorized as Regulated ACM (RACM).

ACM

- **Vinyl floor tile (VFT), 9”x9”, tan with brown splotches & associated Black Mastic (Note: all of the different color replacement VFT are also ACM)**
- **Black mastic (remnant flooring mastic)**
- **Tar roof patch (all types & colors)**

Note: ACM can become RACM if an ACM material becomes friable by damage or is rendered friable by use of certain aggressive abatement methods.

One material is further categorized as NESHAP Regulated ACM (RACM), as summarized below. The abatement and disposal of RACM is more stringently regulated.

RACM

- **Pipe insulation, 4” straits, white cardboard**

One type of material has potential to contain asbestos, but was not sampled during this survey. The following materials or areas must be presumed to contain asbestos.

PACM

- **Heat shields and internal mounting boards in electrical panels (all electrical panels)**

  Note: materials on the interior of electrical panels are not sampled due to electrical hazards.

Note: materials presumed to contain asbestos must be presumed to be RACM until sampled and/or assessed by a certified asbestos consultant, and properly classified.

The project ACM and ACCM are listed in Table 2 below, including location, asbestos content, the agency categorization, abatement requirements, and waste categorization. The locations of the project ACM/ACCM are shown on Figures 6-8, Appendix A.

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

Garberville Veterans Building
483 Conger St., Garberville, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Gypsum board/joint compound (drywall)	On the walls in the Kitchen, Women's Restroom & Men's Restroom (See Fig. 6)	Approx. 2,250 SF	2% CH in joint compound by initial PLM 0.3% to 0.8% CH on composite of joint compound/ gypsum board by 400 Point Count	ACCM, Class II abatement required where disturbed	ACCM Not RACM*	Non-Friable asbestos waste or general construction debris
Vinyl floor tile (VFT), 9"x 9", tan with brown splotches and associated black mastic, including all different color replacement tiles **Note:** the underlaying plywood is contaminated, and must be disposed of as contaminated asbestos waste	On the floor in the Kitchen, HVAC Closet, Judges Chamber, Office 1 & Office 2, on plywood (See Fig. 6)	Approx. 1,125 SF	VFT = 2-4% CH Mastic = <1% - 8% CH	ACM, Class II abatement if by "hand" methods Class I abatement if by "mechanical" means	Category I Non-Friable ACM & not RACM* if abated by "hand" methods Friable and RACM if abated by "mechanical" means"	Non-Friable asbestos waste if abated by hand methods Friable waste if abated by mechanical means
Remnant black flooring mastic **Note:** the overlaying carpet and the underlaying plywood are contaminated, and must be disposed of as contaminated asbestos waste	In the Hall, under carpet and gray floor leveling, on plywood (See Fig. 6)	Approx. 750 SF	4% CH	ACM, Class II abatement if by "hand" methods Class I abatement if by "mechanical" means	Category I Non-Friable ACM & not RACM* if abated by "hand" methods Friable and RACM if abated by "mechanical" means"	Non-Friable asbestos waste if abated by hand methods Friable waste if abated by mechanical means

TABLE 2
ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS

Garberville Veterans Building
483 Conger St., Garberville, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
Tar roof patch, gray Note: all roof patch is ACM	Roof, on exhaust vents, septic vents, drains, on the metal parapet wall cap seams, and a few patches on the main roofing membrane (See Fig. 8)	Approx. 350 SF	5% CH	ACM, Class II abatement required where disturbed	Category I Non-Friable ACM Not RACM*	Non-friable asbestos waste
Pipe insulation (TSI), 4" straits, white cardboard Note: there is potential for ACM pipe insulation to be present in inaccessible areas of the walls	In the Crawlspace, running under the Kitchen to the restrooms, and the HVAC Closet, and debris on the ground below the pipe (See Fig. 7)	Approx. 75 LF	55% CH	ACM, Class I abatement required where disturbed	"Friable" RACM	"Friable" asbestos waste
Heat shields and internal mounting boards in electrical panels (all electrical panels)	Throughout	TBD	PACM	PACM, Class II abatement required where disturbed	Category I Non-Friable PACM Not RACM*	Non-friable asbestos waste

ACM = Asbestos Containing Materials, containing >1% asbestos

ACCM = Asbestos Containing Construction Materials, asbestos content of 0.1% to 1.0%

CH = Chrysotile Asbestos

Friable = asbestos material containing >1% asbestos, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure

LF = Linear Feet

PACM = Presumed ACM

RACM = Regulated ACM under NESHAP regulations

RACM* = Not considered RACM if asbestos content is 1% or less, or if not made friable by disturbance

SF = Square Feet

4.0 CONCLUSIONS AND REGULATORY REQUIREMENTS FOR ASBESTOS

Conclusions

Asbestos containing materials were identified during this survey.

The disturbance, abatement, and demolition of the materials containing asbestos will require compliance with the EPA NESHAP, and Cal/OSHA regulations regarding asbestos in construction.

All asbestos containing material to be removed by renovation or demolition activities must be done by a registered asbestos abatement contractor, as an asbestos abatement project.

The data and conclusion contained in this report are only applicable to the sampled/surveyed spaces/materials and should not be used to assess materials elsewhere at the site. If suspect materials that were not covered by this survey are encountered by the contractor during the project, the disturbance of such materials should cease until such materials are surveyed and/or sampled for asbestos. (Note: un-sampled materials must be presumed to contain asbestos until sampled and proven otherwise).

Regulatory Requirements

The EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) requires an asbestos survey to identify the possible presence of any *Asbestos Containing Materials* (ACM) prior to any renovation and/or demolition work at "subject" sites. That requirement has been met with this report.

Friable NESHAP Regulated Asbestos Containing Material (RACM) was identified during this survey however, the identified quantity is below the quantity that requires the NESHAP notification. **A NESHAP Notification for "abatement" will not be required prior to abatement of the materials containing asbestos**. See the "EPA NESHAP" section below for detail on the NESHAP notification requirements.

NESHAP defines the removal of any "load bearing" members" in the course of renovation work as "demolition" work. **If any "load bearing members" are to be removed during the renovation project, or the building is to be demolished, a NESHAP Notification for "demolition" will need to be filed at least 10 days prior to such work**. See the EPA NESHAP section below for detail on the NESHAP notification requirements.

Cal/OSHA regulates any disturbance or abatement of any material containing any amount of asbestos. All asbestos abatement must be performed by a registered asbestos abatement contractor, using properly trained and certified asbestos abatement workers. All asbestos abatement must be conducted following Cal/OSHA defined asbestos abatement methods. See the Cal/OSHA section below for further discussion of regulatory requirements.

The ACM and ACCM identified in this survey may be properly abated at any time following the required **temporary worksite notification to the Division of Occupational Safety and Health, which must be submitted a minimum of 24-hours prior to abatement activities.**

If you are required to obtain a permit from a local or county building department you will need to file this report with them.

Project ACM & ACCM

The regulatory requirements for the abatement and disposal of project ACM and/or ACCM identified in this survey are discussed below.

ACCM Joint Compound/Drywall: The drywall joint compound on gypsum drywall identified in this survey contains asbestos. The material was found to contain <1% asbestos therefore, the material is defined as ACCM. While the ACCM designation excludes the materials from regulation under NESHAP, Cal/OSHA requires Class II methods for abatement/disturbance of the material by a registered asbestos abatement contractor. It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area.

While materials determined to be ACCM are often characterized as "general construction debris," many asbestos abatement contractors will choose to dispose of the abated ACCM as "non-friable" asbestos waste to avoid possible liabilities insofar as worker protection on the site, during transport, and disposal. If disposed of as "general construction debris," it is recommended herein that all ACCM be handled/contained at the jobsite and transported as ACM up to the point of actual disposal at an accepting waste facility. Waste facilities typically must be informed when the waste is ACCM.

ACM Vinyl Floor Tile (VFT) & ACM Black Mastic: the 9"x9" VFT and associated black mastic identified in this survey contain asbestos. Any disturbance or abatement of the ACM VFT/mastic must be done by a licensed asbestos abatement contractor. Class II asbestos abatement methods are required for abatement by "hand" methods, with disposal as "non-friable" asbestos waste.

If abated by "mechanical" means, which includes using a chipper/buffer machine for VFT/mastic removal, the VFT/mastic will be rendered "friable," and be re-classified as RACM. Class I abatement measures will be required, with disposal of the abated RACM as "friable" asbestos waste. A NESHAP Notification for RACM abatement will also be required if mechanical means are used for abatement of the VFT/mastic.

ACM Remnant Black Mastic: the remnant black flooring mastic identified in this survey contains asbestos. Any disturbance or abatement of the mastic must be done by a licensed asbestos abatement contractor. Class II asbestos abatement methods are required for abatement by "hand" methods, with disposal as "non-friable" asbestos waste.

If abated by "mechanical" means, which includes using a chipper/buffer machine for VFT/mastic removal, the VFT/mastic will be rendered "friable," and be re-classified as RACM. Class I abatement measures will be required, with disposal of the abated RACM as "friable" asbestos

waste. A NESHAP Notification for RACM abatement will also be required if mechanical means are used for abatement of the VFT/mastic.

ACM Tar Roof Patch: Any abatement or disturbance of the ACM tar roof patch identified in this report must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

RACM Pipe Insulation: Any abatement of the ACM pipe insulation (TSI) identified in this report must be done by a licensed asbestos abatement contractor as Class I work, using Class I methods. The abated waste must be disposed of as "friable" asbestos waste. This will require the use of a licensed "hazardous" waste hauler. In addition, a temporary hazardous waste generator number from the EPA will need to be obtained for the site. An abatement contractor will typically handle these issues.

PACM Electrical Panel Heat Shields/Mounting Blocks: The heat shields and interior mounting boards commonly found behind fuses and breaker switches in electrical panels/boxes often contain asbestos, and are presumed to contain asbestos herein. Any abatement or disturbance of the PACM materials must be done by a licensed asbestos abatement contractor using Class II methods, with disposal as "non-friable" asbestos waste.

5.0 ASBESTOS REGULATIONS & DEFINITIONS

Regulations

The following regulations are some of the more pertinent Federal and California asbestos regulations, and one or more of these regulations will apply to construction projects in California.

EPA Asbestos Hazard Emergency Response Act (AHERA): The Asbestos-Containing Materials in Schools Rule (40 CFR Part 763, Subpart E) regulates asbestos in schools including, but not limited to; inspections, response actions, clearances, training, and certifications.

EPA National Emissions Standard For Hazardous Air Pollutants (NESHAP): The NESHAP regulation (40 CFR, Part 61, Subpart M) applies to all commercial, public, institutional, industrial, and residential structures with more than four dwelling units, and requires an asbestos survey prior to demolition and/or renovation activities on subject properties.

Cal/OSHA Asbestos Construction Standard: The Cal/OSHA standard (8 CCR 1529) is designed to protect employees (workers) from adverse exposure to asbestos in any workplace, and in particular, regulates the asbestos abatement industry.

Department of Toxic Substance Control (DTSC): The California code of Regulations, 22 CCR 66261- 66263 apply to hazardous waste generation and disposal in California, including "friable" asbestos.

Some of the general regulatory requirements for asbestos related construction work and asbestos containing waste are discussed below. Depending on the types of asbestos containing material found at a site, some or all of these regulatory requirements will apply.

EPA NESHAP

All commercial, public, institutional, industrial, and residential structures with more than four dwelling units, are subject to the EPA NESHAP regulations concerning renovation and/or demolition work. NESHAP requires an asbestos survey to identify the possible presence of any *Asbestos Containing Materials* (ACM) prior to any renovation and/or demolition work at "subject" sites.

The NESHAP regulation requires filing a NESHAP Notification with the enforcing agency in the following two cases.

If Regulated Asbestos Containing Material (RACM) is present and is to be abated, and the amount of RACM to be abated exceed the threshold quantity of 160 square feet, 260 linear feet, or 35 cubic feet, a NESHAP Notification for the *abatement* of RACM will need to be filed with the enforcing agency, at least ten working days prior to the commencement of abatement activities. The notification includes: the NESHAP notification form; a copy of this report; and a filing fee.

If the proposed renovations will disturb any *"load bearing"* members, such work is considered "demolition" work, and a NESHAP Notification is required prior to any "demolition" work. The NESHAP Notification for *demolition* must be filed with the enforcing agency, at least ten working days prior to any "demolition" activity.

If both abatement of RACM and demolition are to be conducted, the NESHAP notification for "abatement" and "demolition" can be filed using the same form however, a filing fee is required for each notification.

The assistance of the asbestos abatement contractor will typically be needed to file the NESHAP Notification form.

Cal/OSHA

The Cal/OSHA Asbestos Standard for the Construction Industry (8 CCR 1529) regulates any disturbance or abatement of any material containing any amount of asbestos. All employees are covered by OSHA regulations, and the disturbance of ACM or ACCM is subject to Cal/OSHA worker protection regulations for asbestos related work.

The Cal/OSHA regulations require that "any activities disturbing" ACM or ACCM materials must be done by properly trained and certified asbestos abatement contractors & workers, using proper abatement methods. It is therefore necessary to identify, and properly abate ACM and ACCM from buildings prior to the disturbance of such materials by renovation or demolition activities.

An employer who conducts asbestos related work involving more than 100 square feet of material containing any amount of asbestos must be registered with the Division of Occupational Safety and Health (DOSH).

A temporary worksite notification must be filed with Division of Occupational Safety and Health (DOSH) at least 24 hours prior to asbestos abatement activities. The asbestos abatement contractor will typically submit this notification.

DTSC

The Department of Toxic Substance Control (DTSC) is the California agency responsible for enforcing the hazardous waste laws. The California code of Regulations, 22 CCR 66261.24 (a)(2) defines "friable" asbestos waste as "hazardous" waste.

A hazardous waste generator "Temporary State Hazardous Waste Id Number" must be obtained from the DTSC when friable ACM waste is generated at a site, all friable asbestos waste must be transported as hazardous waste by a licensed hazardous waste hauler, and all friable asbestos waste must be disposed of as hazardous waste, at an approved Class I waste facility. The Temporary State Id number can be obtained on the DTSC website at:

https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/

Friable asbestos waste may be temporarily stored on-site pending transport for a period of up to 90 days. While being stored pending transport, such waste must be contained in proper bags of containers, clearly and properly labeled as hazardous asbestos material, and secured in a locked storage location with proper asbestos warning signs.

The shipping of "non-friable" asbestos waste does not require a hazardous waste hauler, and can be performed by an abatement contractor or other commercial transporters however, the material must be handled and disposed of as asbestos containing material.

Definitions

The following list include some of the more common asbestos definitions, and is not intended to be a complete listing of all asbestos related definitions.

Asbestos Containing Construction Materials (ACCM): contain asbestos in amounts between 0.1% and 1.0%.

Asbestos Containing Materials (ACM): are materials that contain >1% asbestos.

Class I Abatement: For abatement of "friable" ACM as listed in Table 1, Class I abatement methods are required by Cal/OSHA, at a minimum, for the protection of workers. Class I abatement requires all Class II measures plus full negative air containment of the work area, with a three-stage decontamination unit, including a shower, or, for some applications, the use of glovebags, or other small negative pressure enclosures. All friable waste must be disposed of as very restrictive "friable" asbestos waste, using a licensed hazardous waste transporter,

and a hazardous waste manifest. An EPA waste generator ID number must be obtained for the (abatement) site.

Class II Abatement: For abatement of all ACM listed in Table 1, Class II abatement methods are required, at a minimum, by Cal/OSHA for the protection of workers. Among other measures, Class II abatement procedures requires the use of a licensed asbestos contractor, trained asbestos abatement personnel, respiratory protection, the use of "wet methods" for effective dust suppression, and the use of "critical barriers", and other measures for the effective isolation of indoor work areas. "Visible" dust emissions must not be allowed to escape the work area. Bagged ACM roofing materials must be carefully lowered to the ground and must not be thrown from roofs.

Clearances and Monitor Testing: With the exception of K-12 school sites, post-remedial "clearance" testing for air-borne asbestos in indoor work areas is not mandated by law, but is an option of the owner, as is a visual observation of post-abatement work by a third party. Post remedial air clearance testing is not applicable to exterior and roofing abatement. Post-remedial air clearance for this site is an option available to the owner to verify and document site safety prior to re-occupation.

Disturbance of Asbestos: Disrupt the matrix, crumble, or pulverize asbestos or generate visible debris.

Friable Asbestos: Asbestos Containing Materials (ACM) that can be crumbled into a powder by hand pressure. Some types of asbestos are friable by nature, such as most insulation, and some are "non-friable" types, generally tightly bound in some tar or other binding matrix, such as vinyl floor tiles, but which may become friable by deterioration or damage. Friable asbestos is more likely to allow harmful fibers to become airborne. The abatement, handling, and disposal methods for "friable" asbestos are more restrictive.

Mechanical Abatement Methods: Mechanical methods of asbestos abatement include the use of chippers for floor tile and floor buffers/solvents for mastic removal, and any other mechanical methods, as opposed to "normal" hand methods (see below). Mechanical methods typically generate more airborne asbestos fibers and thus require stricter Class I abatement measures (vs Class II), and disposal of abated ACM as more restrictive "friable" asbestos waste.

Normal (Hand) Abatement Methods: "Normal" hand methods of abatement include hand tools such as pry bars and scrapers, and using rags & mops with solvents, as opposed to "mechanical" means (see above). "Normal" methods are less aggressive, less likely to damage the asbestos, and less likely to generate airborne fibers, thus allowing the use of less restrictive Class II abatement measures/controls and less restrictive disposal as "non-friable" asbestos waste.

Post-Abatement Clearances: Pursuant to AHERA regulations, for all K-12 schools, post abatement visual inspection of all abatement work must be conducted by a Certified Asbestos Consultant. Post-abatement "clearance" testing for air-borne asbestos in all indoor work areas

is also required. Personnel that are not trained and certified for asbestos work cannot enter the abatement area until after it has passed the post-abatement "clearance" testing.

Presumed Asbestos Containing Material (PACM): is material presumed to be >1% asbestos.

Regulated Asbestos Containing materials (RACM): refers a category of ACM that is subject to EPA NESHAP regulation, includes friable ACM and ACM that has or will become friable.

6.0 PAINT SAMPLING/LEAD ANALYSIS

During this survey sampling for lead in paint was conducted on representative building components, and lead waste characterization was conducted to determine the lead hazard category of the "project" demolition waste.

XRF Paint Sampling

Sampling for lead in paint was conducted using a portable Heuresis Corporation, Pb200i XRF (X-ray fluorescence) Lead Paint Analyzer. The XRF was used to measure lead content in paint coatings of thirty-three (33) components on the interior and exterior of the building.

A description of sampled components, sample locations, and XRF data is contained in Table 3, Appendix B. The XRF Paint Analyzer Data sheet is also contained in Appendix B. All XRF sample locations are indicated on Figure 5, Appendix A.

Paint coatings on building components are placed in one of three categories, based on the lead content identified by XRF sampling. The three categories are defined by the amount of lead contained in a paint coating, and are listed below.

- **Lead Based Paint (LBP)** is defined as paint with a lead content at or above 1.0 mg/cm^2.
- **Lead Containing Surface Coatings (LCSC)** are paints with lead content that include 0.1 mg/cm^2 and range up to but not including 1.0 mg/cm^2.
- **Undetectable for Lead** are results of less than 0.1 mg/cm^2 lead content, and are deemed to be essentially "lead free."

By XRF analyses: two (2) sampled component were identified to have Lead Based Paint (LBP), eight (8) were found to have trace amounts of lead, and twenty-three (23) were found to be "negative" for detectable lead.

Lead Based Paint(LBP) was found on the following building component/fixture types:

- Ceramic sinks (RR's)
- Ceramic toilets (RR's)

See Table 3, Appendix B for all sampled components and lead content identified.

Lead Waste Characterization

One bulk sample, representing the anticipated demolition waste stream for the building to be demolished, was collected for lead waste characterization analysis. The sample excluded all asbestos containing materials as they should be abated prior to demolition, and metal components as they can be recycled.

The sample was submitted to a certified laboratory (AmeriSci Los Angeles) for lead waste characterization analysis, and was tested for toxicity by Total Threshold Limit Concentration (TTLC) analysis, and the Toxicity Characterization Leaching Procedure (TCLP) analysis. The lead waste analysis sample is listed below:

2011- LWA: anticipated demolition waste stream for the entire building.

The demolition waste is characterized based on the federal and state criteria for the required analytic methods, which are defined below:

TTLC = Total Threshold Limit Concentration, by EPA 3050B/7000B (California initial test) TTLC results of: ≥ 1,000 mg/kg lead content are considered hazardous waste by California standards (22 CCR 66261.24)

STLC = Soluble Threshold Limit Concentration (California waste "wet" test), by EPA 3010A/6010C, STLC results of: ≥ 5.0 mg/L lead content are considered hazardous waste by California standards (22 CCR 66261.24)

TCLP = Toxicity Characterization Leaching Procedure (Federal waste "wet" test), by SW-846 1311 EPA 3010A/7000B, TCLP results of: ≥ 5.0 mg/L lead content are considered hazardous waste by federal standards (40 CFR 261.24), and by California standards (22 CCR 66261.24)

The analytic result for the TTLC analysis was 11 mg/kg (milligrams per kilogram) lead content, and the analytic result for the TCLP analysis was 0.053 mg/L (milligrams per liter) lead content. **The sampled demolition waste is considered non-hazardous waste by both California and federal criteria.**

The laboratory report for the waste characterization analysis as well as a Table 4 summary of the characterization results are included in Appendix B.

7.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD

Lead In Paint

The XRF sampling of paint coatings identified the presence of LBP in the glazing of the sinks and toilets in the restrooms, and trace amounts of lead was identified on several of the interior and exterior building components.

All project demolition work that disturbs building components containing any amount of lead should be conducted as lead related demolition work.

The disturbance of any LBP and/or LCSC by Cal/OSHA defined "trigger tasks" or any lead related construction work that may result in lead exposure to workers or occupants requires compliance with the Cal/OSHA Lead Construction Standard (Title 8 CCR 1532.1) for worker protection.

Lead related construction work also require compliance with the California Code of Regulations Title 17, CCR 35000-36100.

Any contractor conducting lead related construction (demolition) work should be familiar with the applicable lead regulations, and certified to conduct lead related activities.

All personnel conducting lead related construction work should be trained and certified to conduct lead related activities (demolition).

The building can be demolished using heavy equipment however, if manual demolition is conducted an Exposure Assessment must be performed at the start of the manual demolition activity.

Exposure Assessment requires the collection of personal air samples to be submitted for laboratory analyses of lead content, to determine if the Action Level (AL) or the Permissible Exposure Limit (PEL) for airborne lead will be met or exceeded during the work. Pending that assessment, the contractor must provide interim protective measures, including but not limited to, respirators, protective clothing, and training.

Lead In Demolition Waste

Based on the lead waste characterization, the anticipated demolition waste for the building is categorized as Non-Hazardous waste by both California and federal standards, therefore the demolition waste may be transported and disposed of as "general construction debris" at any accepting Class II or Class III landfill facility.

Painted metal components may be properly disposed of through a licensed recycling facility, regardless of lead content. Recycling facilities must be notified when recycle components have surface coatings containing lead.

Note: if any painted materials are removed from the characterized demolition waste stream and disposed of separately, lead waste characterization testing of the newly separated materials must be conducted, and the separated waste must be disposed of under the new waste classification, in accordance with State and Federal regulations.

8.0 LEAD REGULATIONS & DEFINITIONS

Regulations

The following regulations are some of the more pertinent Federal and California lead regulations pertaining to lead, and some or all of these regulations will apply to construction projects in California.

Cal/OSHA Construction Safety Orders, Lead: The Cal/OSHA regulation (8 CCR 1532.1) pertains to all workers who may be exposed to lead in the work place.

Title 17, California Code of Regulations: The "Accreditation, Certification, and Work Practices For Lead-Based Paint and Lead Hazards" (17 CCR 35000-36100) regulation applies to lead related construction in California.

EPA Lead Renovation, Repair, and Painting Rule (RRP): The RRP rule (40 CFR Part 745) applies to all maintenance, renovation and other construction activities conducted in pre-1978 housing and child-occupied facilities, including residential, public, and commercial building.

U.S Department of Housing and Urban Development (HUD): The "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," second edition, 2012, is comprehensive document developed by HUD to help contractors, property owners, and other organizations identify lead-based paint, lead hazards, and control lead hazards, in an effort to reduce childhood exposure to lead. This guideline is not a regulation however it is directly incorporated into some lead regulations.

Department of Toxic Substance Control (DTSC): The California code of Regulations, 22 CCR 66261- 66263 applies to generation and disposal of waste categorized as hazardous waste by California criteria, including hazardous lead containing construction waste.

Resource Conservation and Recovery Act (RCRA): The Federal code of Regulations, 40 CFR 260-262, applies to generation and disposal of waste categorized as hazardous waste by federal criteria, including hazardous lead containing construction waste.

Some of the basic regulatory requirements for lead related construction work and lead containing waste are discussed below.

Cal/OSHA Compliance Measures for Lead Related Construction Work

The disturbance of any LBP and/or LCSC by Cal/OSHA defined "trigger tasks" " or any lead related construction work that may result in lead exposure to workers or occupants requires compliance with the Cal/OSHA Lead Construction Standard (Title 8 CCR 1532.1) for worker protection. The Cal/OSHA "trigger tasks" include various actions that would disturb LBP or LCSC paint including, but not limited to, manual demolition, scraping, sanding, cutting, sawing, and torch cutting. Some key compliance measures are summarized below (see Title 8 CCR 1532.1 for all Cal/OSHA requirements).

Any contractor performing any of the Cal/OSHA trigger tasks must comply with the provisions of the Cal/OSHA Lead Construction Standard (Title 8 CCR 1532.1). More specifically, an Exposure Assessment must be performed at the start of any trigger task activities. This assessment involves the collection of personal air samples to be submitted for the laboratory analyses of lead content to determine if the Action Level (AL) or the Permissible Exposure Limit (PEL) for airborne lead will be met or exceeded during the work. Pending that assessment, the contractor must provide interim protective measures, including but not limited to; respirators, protective clothing, and training.

If initial assessment demonstrates the possibility that the AL will be met or exceeded during the work, continued worker exposure monitoring must be conducted. If initial assessment demonstrates the possibility that the PEL will be exceeded during the work Cal/OSHA requirements include but are not limited to: establishment of regulated areas, continued use of respirators, continued personal air monitoring, protective clothing, hygiene facilities, medical surveillance, and training certified by the California Department of Public Health (CDPH).

In addition, the disturbance of Lead Based Paint in excess of 100 square feet will require a contractor to file a "Lead-Work Pre-Job Notification" with Cal/OSHA at least 24 hours prior to performing any trigger tasks.

Title 17 Compliance Measures For Lead Related Construction Work & Lead Abatement

In California, lead activities are regulated by the California Code of Regulations Title 17, CCR 35000-36100, which include, but are not limited to, requirements for lead related construction work, lead abatement, worker training, and worker certification. Title 17 regulatory requirements for worker certification, and work practices are enforced by the California Department of Public Health (CDPH).

Any contractor performing any lead activities must use "Lead-Safe Work Practices" (17 CCR 36050), which include: use of containment (17 CCR 35016), no visible dust or debris remaining at completion of work, and demonstrate compliance to the CDPH if requested.

Title 17 defines "Lead Activities" as "abatement, lead hazard evaluation, lead-related construction work, or any activity which disturbs lead-based paint, presumed lead-based paint, or creates a lead hazard (17 CCR 35032).

Title 17 defines "Lead Related Construction Work," as "any construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance of any residential or public building, including preparation and cleanup, that, by using or disturbing lead-containing material or soil, may result in significant exposure of adults or children to lead (17 CCR 35040).

Title 17 defines "Abatement" as "any set of measures designed to reduce or eliminate lead hazards or lead-based paint for public and residential buildings, but does not include containment or cleaning" (17 CCR 35001). See 17 CCR 35000-36100 for all Title 17 regulatory requirements for lead activities.

Title 17 fully incorporates work practices defined by the "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," U.S. Department of Housing and Urban Development (HUD), June 1995.

Lead Containing Waste

Both State and Federal laws regulate the disposal of lead containing materials in landfills. In California, the disposal of lead containing materials is regulated by the Department of Toxic Substance Control (DTSC). If demolition debris potentially contains lead containing material; the waste stream must be tested for lead content, and characterized for proper waste disposal.

Completion of a 'waste profile" requires that at least one representative bulk sample of the waste stream be collected and submitted for laboratory analysis of lead content for waste characterization.

The results of the lead waste characterization determine the "hazard level" of waste, which can range from unrestricted "general construction debris," California hazardous waste, and highly restrictive Resource Conservation and Recovery Act (RCRA) federal "hazardous" waste.
Generation of waste materials that meet the California hazardous waste criteria require the generator to obtain a Temporary State Hazardous Waste Id Number. Hazardous waste haulers and disposal sites are also required to have a State Id Number.
Generation of more than 100 kg (220 lbs) of waste materials that meet the federal (RCRA) waste criteria require the generator to obtain a Temporary Hazardous Waste EPA Id Number. Hazardous waste haulers and disposal sites are also required to have an EPA Id Number for RCRA waste.

The Temporary State Id Number and the Temporary EPA Id Number can be obtained on the DTSC website at:

- **https://dtsc.ca.gov/apply-for-hazardous-waste-epa-id-number/**

Painted Metal Recycling

Painted metal components may be properly disposed of through a licensed recycling facility, regardless of lead content. In that case painted metal components need not be, and were not, included in the waste stream testing for lead. Recycling facilities must be notified when recycle components have lead containing surface coatings.

Definitions

The following definitions include some of the more common lead terminology, and are taken directly from the Cal/OSHA regulation (8 CCR 1532.1), and the Title 17, California Code of Regulations (17 CCR 35000-36100).

Action level means employee exposure, without regard to the use of respirators, to an airborne concentration of lead of 30 micrograms per cubic meter of air (30 μg/m3) calculated as an 8-hour time-weighted average (TWA) [8 CCR 1532.1 (b)].

Abatement means any set of measures designed to reduce or eliminate lead hazards or lead-based paint for public and residential buildings, but does not include containment or cleaning. [17 CCR 35001].

Containment means a system, process, or barrier used to contain lead hazards inside a work area such as described in "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," U.S. Department of Housing and Urban Development, June 1995, Chapter 8, "Containment and Barrier Systems," Table 8.1, Table 8.2, and Table 8.3, or "Guide for Containing Surface Preparation Debris Generated During Paint Removal Operations," Society for Protective Coatings, Technology Guide 6, October 1, 2004 [17 CCR 35016].

Lead Activities means abatement, lead hazard evaluation, lead-related construction work, or any activity which disturbs lead-based paint, presumed lead-based paint, or creates a lead hazard [17 CCR 35032].

Lead-Based Paint means paint or other surface coatings that contain an amount of lead equal to, or in excess of: (a) one milligram per square centimeter (1.0 mg/cm2); or (b) half of one percent (0.5%) by weight [17 CCR 35033].

Lead Hazard means deteriorated lead-based paint, lead contaminated dust, lead contaminated soil, disturbing lead-based paint or presumed lead-based paint without containment, or any other nuisance which may result in persistent and quantifiable lead exposure [17 CCR 35037].

Lead-Related Construction Work means any construction, alteration, painting, demolition, salvage, renovation, repair, or maintenance of any residential or public building, including preparation and cleanup, that, by using or disturbing lead-containing material or soil, may result in significant exposure of adults or children to lead [14 CCR 35040].

Lead-Safe Work Practices [17 CCR 36050]: Any individual conducting lead activities, excluding lead hazard evaluation, shall:

(1) Use containment;

(2) Ensure that the work area has no visible dust or debris following the completion of a project;

(3) Demonstrate compliance with (a)(1) and (a)(2) to the Department or local enforcement agency, as defined in section 105251 of the Health and Safety Code, upon request.

Permissible Exposure Limit: The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 μg/m3) averaged over an 8-hour period [8 CCR 1532.1 (c) (1)].

9.0 DISCLAIMER

The sole purpose of this investigation and of this report is to assess the site with respect to asbestos materials and lead containing surface coatings as defined by the scope of work. Brunelle & Clark Consulting, LLC, is not responsible for locating asbestos containing building material in inaccessible areas such as behind walls, above hard ceilings, beneath flooring or underground. The passage of time, manifestation of latent conditions, or occurrence of future events may require further exploration at the site, analysis of data, and reevaluation of the findings, observations, conclusions, and recommendations expressed in the report. This report has been prepared on behalf of and for the exclusive use of the client, and is subject to and issued in connection with the agreement and the provisions thereof. All findings, conclusions, and analytical data presented in this report are based on the information obtained by Brunelle & Clark Consulting, LLC's survey and by the laboratory analysis.

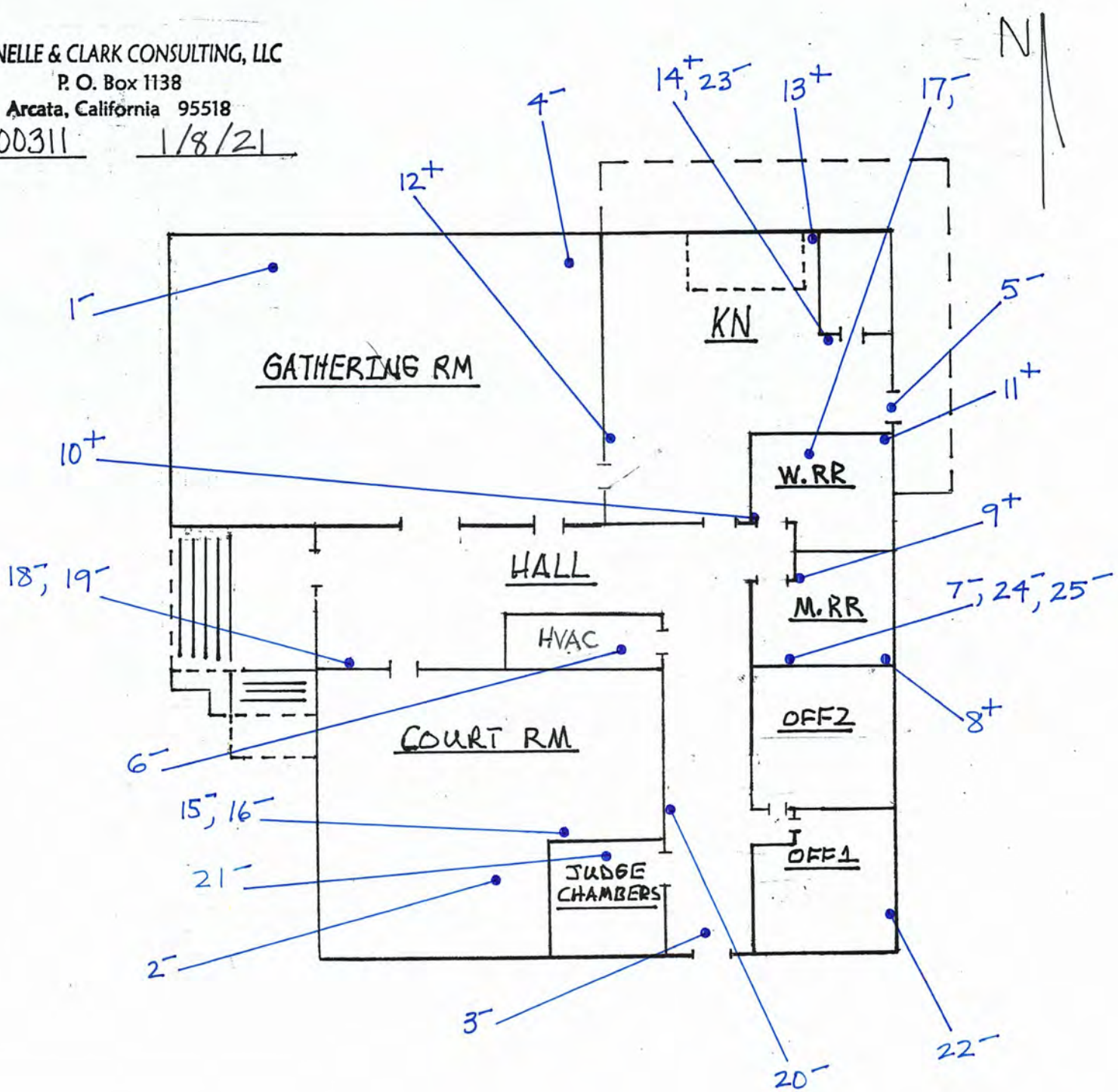
While the owner/operator was responsible for describing the extent and limits of site work, materials to be sampled were determined by the certified (asbestos) building inspector who performed this survey and was not otherwise subject to limitations by the owner/operator.

-end of text-

APPENDIX A
Figures

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2000311 1/8/21



SAMPLE LOCATIONS

(Asbestos Samples: 1-25)

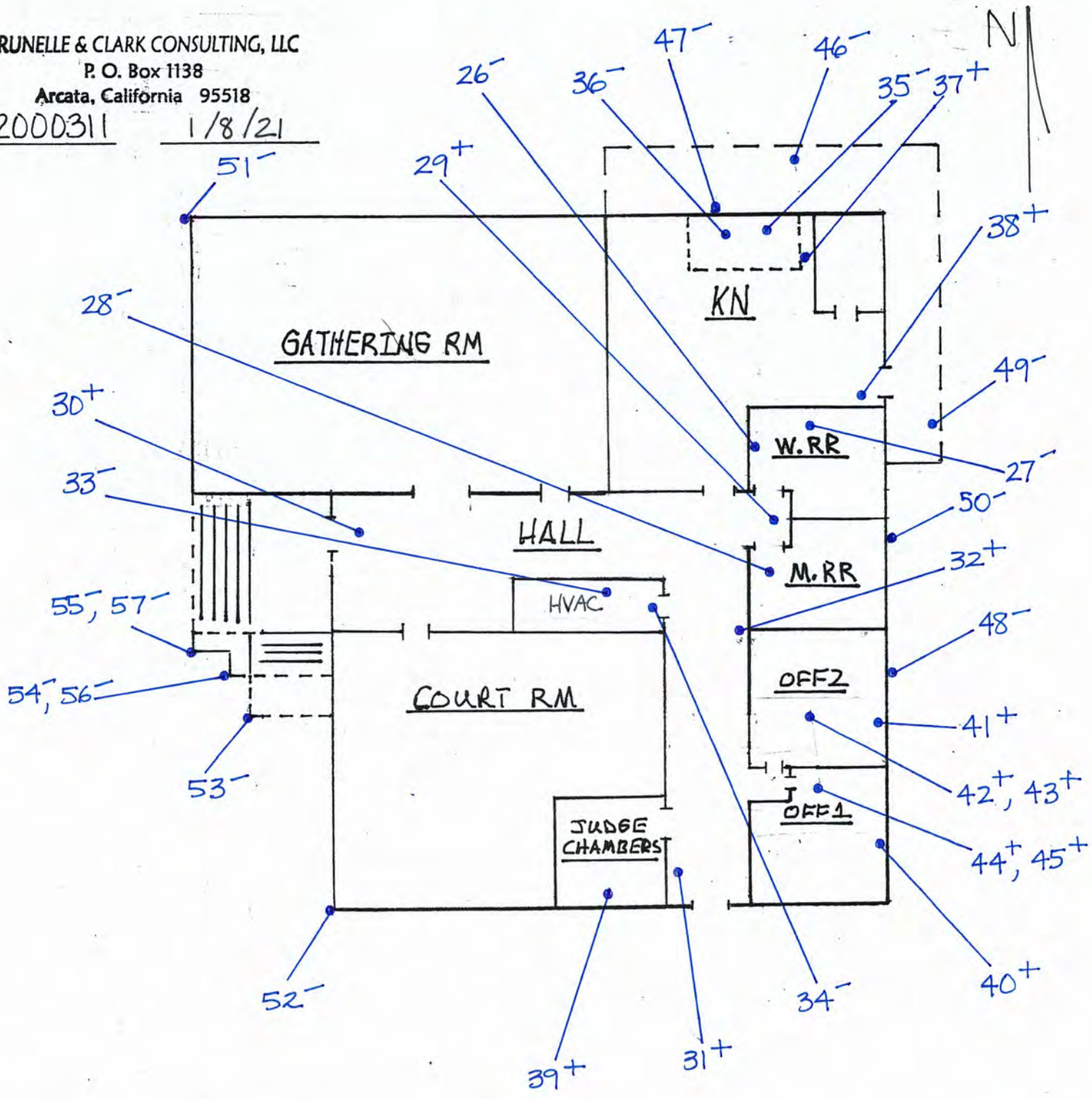
● # Asbestos Sample Locations
(Prefixed 2011- #, with + or − designation)
(+) is positive for Asbestos, (-) is negative

Interior
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 1

BRUNELLE & CLARK CONSULTING, LLC
P. O. Box 1138
Arcata, California 95518

2000311 1/8/21



SAMPLE LOCATIONS

(Asbestos Samples: 26-57)

● # Asbestos Sample Locations
(Prefixed 2011- #, with + or − designation)
(+) is positive for Asbestos, (-) is negative

Interior and Exterior
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 2

BRUNELLE & CLARK CONSULTING, LLC
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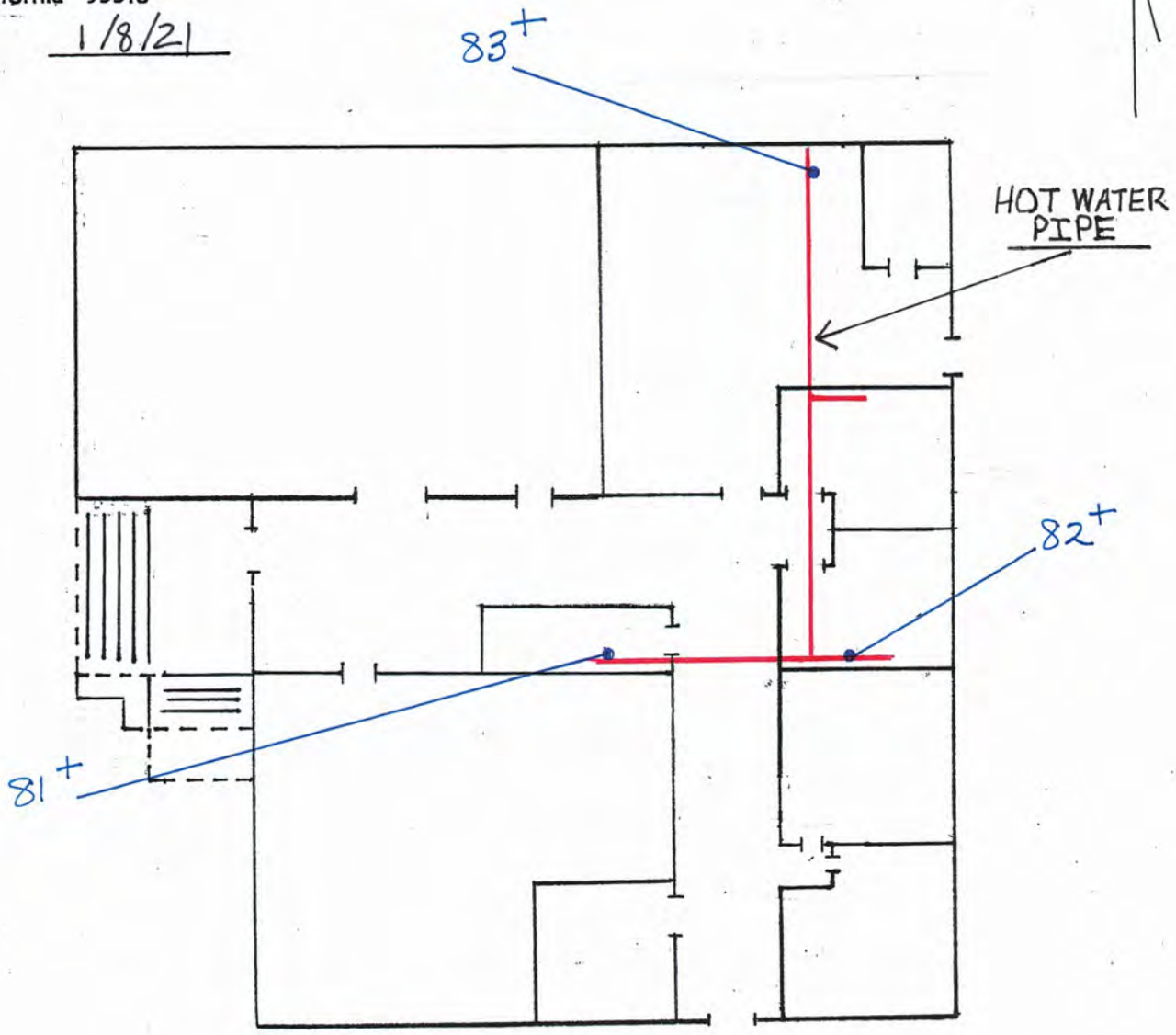

SAMPLE LOCATIONS

(Asbestos Samples: 81-83)

● # Asbestos Sample Locations
(Prefixed 2011- #, with + or − designation)
(+) is positive for Asbestos, (-) is negative

Crawlspace
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 3

BRUNELLE & CLARK CONSULTING, LLC
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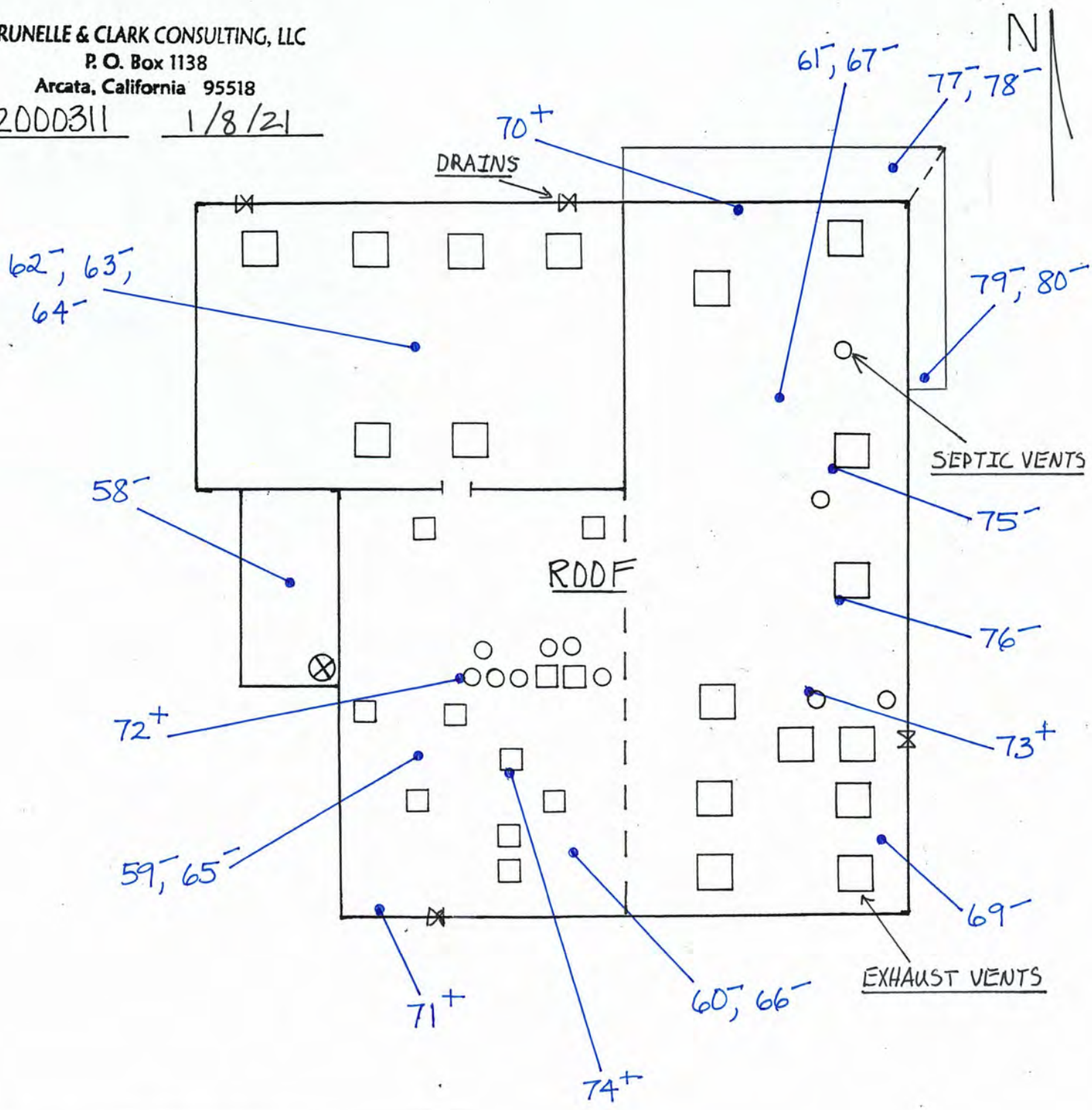

SAMPLE LOCATIONS

(Asbestos Samples: 58-67, 69-80)

—●— # Asbestos Sample Locations
(Prefixed 2011- #, with + or − designation)
(+) is positive for Asbestos, (-) is negative

Roof
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 4

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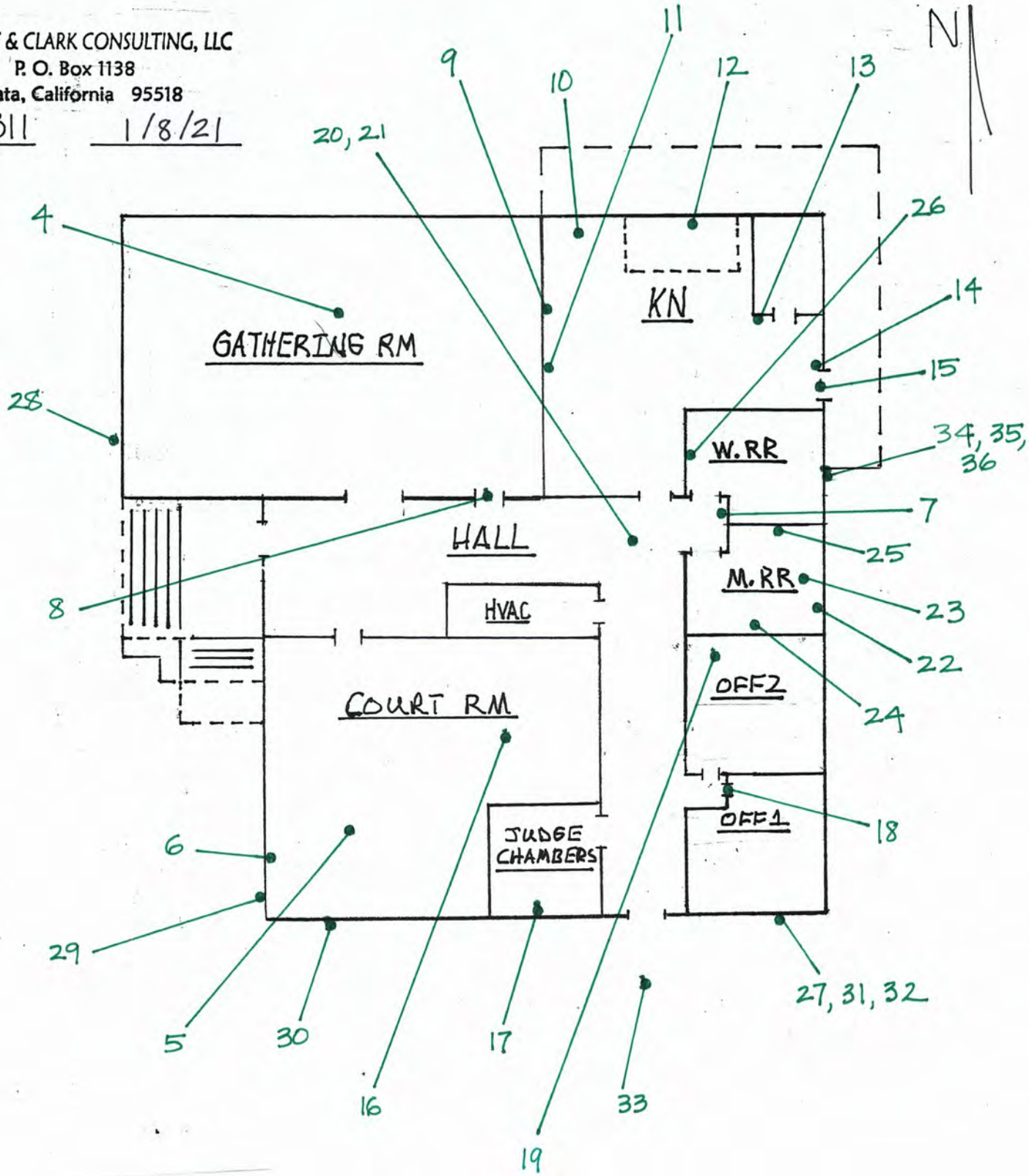

XRF SAMPLE LOCATIONS

(Samples: 4-36)

● # XRF Sample Location

Interior and Exterior
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 5

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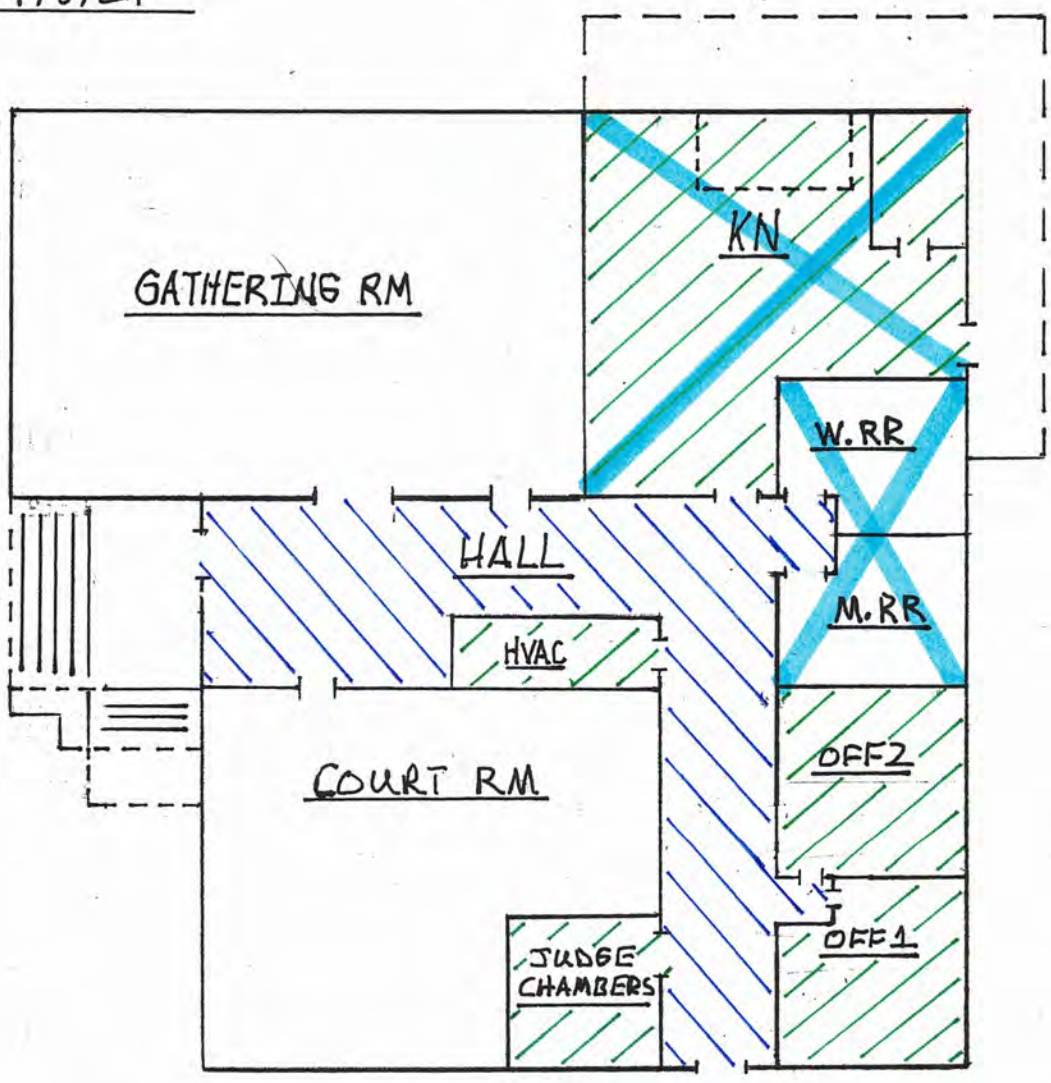

ASBESTOS LOCATIONS

- ACCM Drywall/joint compound
- ACM Black Mastic, under carpet & gray floor leveling
- ACM Vinyl floor tile (9"x9"), tan with brown splotches & associated ACM Black Mastic

Note: See Table 2 for location details

Interior and Exterior
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 6

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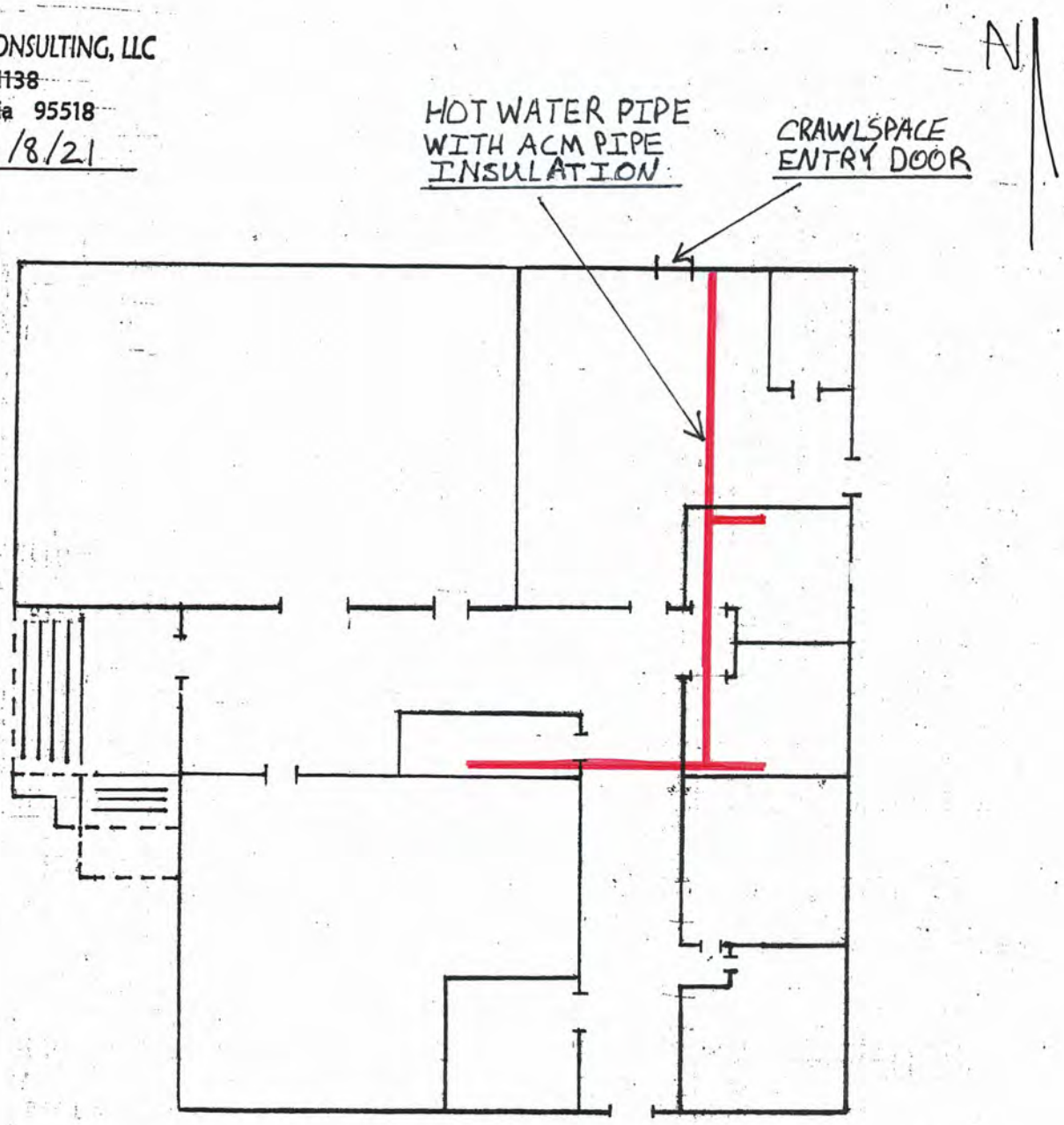

ASBESTOS LOCATIONS

ACM Pipe Insulation (4"), white cardboard (Aircel)

Note: See Table 2 for location details

Crawlspace
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 7

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Arcata, California 95518

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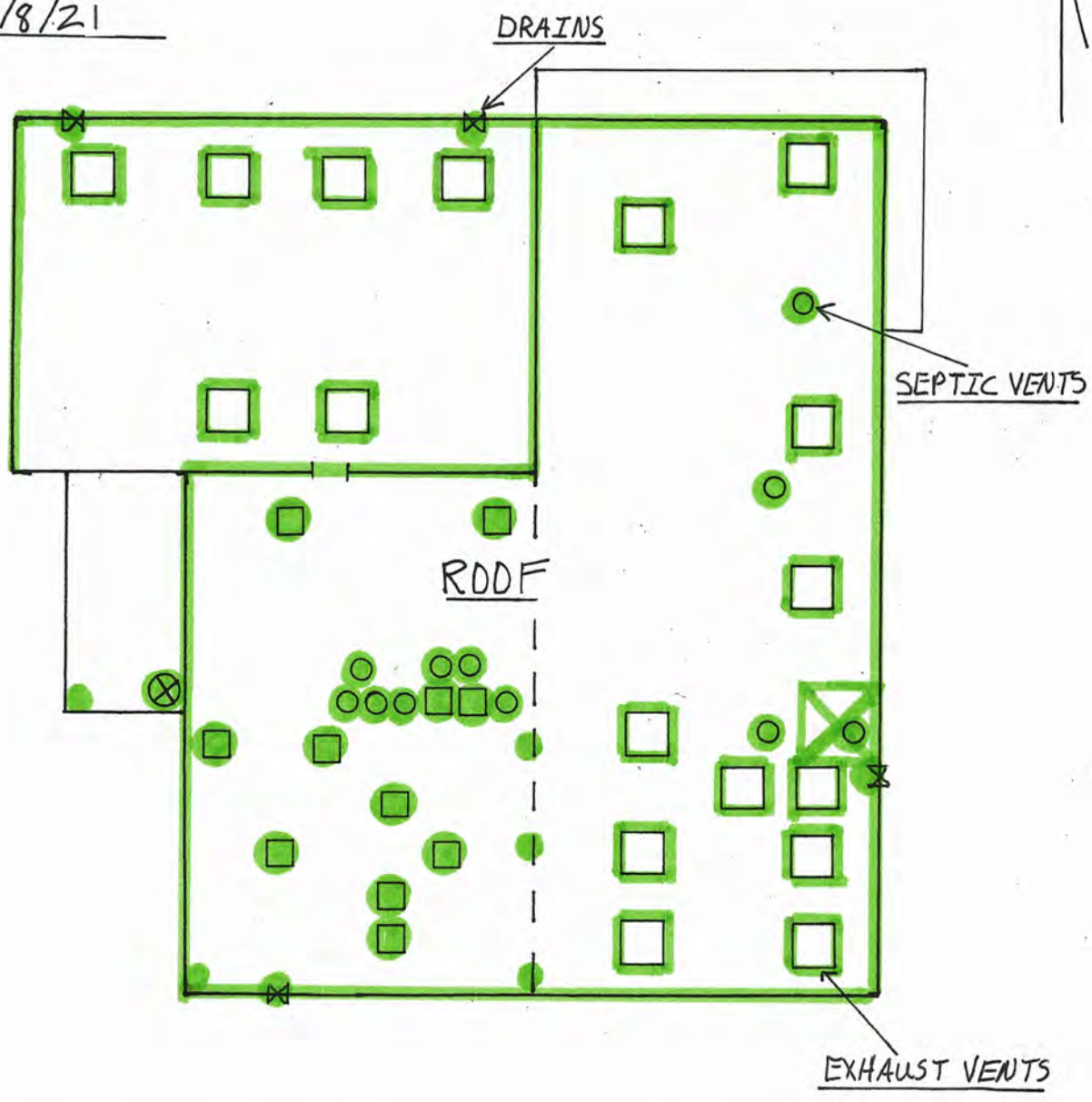

ASBESTOS LOCATIONS

ACM Tar Roof Patch, gray
Note: all roof patch is ACM

Note: See Table 2 for location details

Roof
Garberville Veterans Building
483 Conger Street
Garberville, CA

FIG. 8

APPENDIX B

Tables & Laboratory Reports

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2011-1	Ceiling panel, 2' wide, white and brown fiberboard	Gathering room, ceiling	NAD	NF	
2011-2	Ceiling panel, 2' wide, white and brown fiberboard	Court room, ceiling	NAD	NF	
2011-3	Ceiling panel, 2' wide, white and brown fiberboard	Hall, ceiling	NAD	NF	
2011-4	Tarpaper, black	Gathering room, on sub floor	NAD	NF	
2011-5	Door core, yellow foam	Kitchen, exterior door	NAD	NF	
2011-6	Caulking, white	HVAC closet, HVAC duct	NAD	NF	
2011-7	Glue, tan	Men's RR, FRP	NAD	NF	
2011-8	**Joint compound**	**Men's RR, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**"**	**NAD**	**NF**	**See joint compound above**
400 Point Count	***On composite joint compound/gypsum board sample above***	**"**	***0.8% CH***	**NF**	***By 400 Point Count analysis***
2011-9	**Joint compound**	**Men's RR, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**"**	**NAD**	**NF**	**See joint compound above**
2011-10	**Joint compound**	**Women's RR, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**"**	**NAD**	**NF**	**See joint compound above**
2011-11	**Joint compound**	**Women's RR, wall**	**2% CH**	**NF**	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2nd layer	**…gypsum board**	**‘’**	**NAD**	**NF**	**See joint compound above**
2011-12	**Joint compound**	**Kitchen, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**‘’**	**NAD**	**NF**	**See joint compound above**
400 Point Count	***On composite joint compound/gypsum board sample above***	**‘’**	***0.3% CH***	**NF**	***By 400 Point Count analysis***
2011-13	**Joint compound**	**Kitchen, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**‘’**	**NAD**	**NF**	**See joint compound above**
2011-14	**Joint compound**	**Kitchen, wall**	**2% CH**	**NF**	
2nd layer	**…gypsum board**	**‘’**	**NAD**	**NF**	**See joint compound above**
2011-15	Carpet underlay, brown fabric	Court room, floor, under carpet	NAD	NF	
2011-16	Tarpaper, black	Court room, floor, on sub floor	NAD	NF	
2011-17	Tarpaper, black	Women’s RR, floor, on sub floor	NAD	NF	
2011-18	Baseboard mastic, tan	Hall, vinyl baseboard	NAD	NF	
2011-19	Baseboard mastic, dark brown	Hall, vinyl baseboard	NAD	NF	
2011-20	Baseboard mastic, dark brown	Hall, vinyl baseboard	NAD	NF	
2011-21	Baseboard mastic, dark brown	Judge’s Chamber, vinyl baseboard	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2011-22	Baseboard mastic, dark brown	Office 1, vinyl baseboard	NAD	NF	
2011-23	Baseboard mastic, dark brown	Kitchen, vinyl baseboard	NAD	NF	
2011-24	Baseboard mastic, tan	Men's RR, vinyl baseboard	NAD	NF	
2011-25	Baseboard mastic, dark brown	Men's RR, vinyl baseboard	NAD	NF	
2011-26	Baseboard mastic, dark brown	Women's RR, vinyl baseboard	NAD	NF	
2011-27	Vinyl floor tile, 12x12, gray	Women's RR, floor	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	
TEM	*On Vinyl floor tile layer of sample above*	‘’	*NAD*	*NF*	*By CHATFIELD TEM analysis*
2011-28	Vinyl floor tile, 12x12, gray	Men's RR, floor	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	
2011-29	Floor leveling, gray	Hall, floor, under carpet	NAD	NF	
2nd layer	**Black mastic**	**‘’**	**4% CH**	**NF**	
2011-30	Floor leveling, gray	Hall, floor, under carpet	NA	--	
2nd layer	**Black mastic**	**‘’**	**PACM**	**NF**	**NA/PS**
2011-31	Floor leveling, gray	Hall, floor, under carpet	NAD	NF	
2nd layer	**Black mastic**	**‘’**	**PACM**	**NF**	**NA/PS**
2011-32	Floor leveling, gray	Hall, floor, under carpet	NAD	NF	
2nd layer	**Black mastic**	**‘’**	**PACM**	**NF**	**NA/PS**
2011-33	Sheet flooring, brown slate pattern	Mech closet, floor	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2011-34	Sheet flooring, brown slate pattern	Mech closet, floor	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	
2011-35	Sheet flooring, tan squares	Kitchen, floor, small patch	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	
2011-36	Sheet flooring, tan squares	Kitchen, floor, small patch	NAD	NF	
2nd layer	Yellow glue	‘’	NAD	NF	
2011-37	**Vinyl floor tile, 9x9, dark brown with splotches**	**Kitchen, floor, strip around sheet flooring section**	**4% CH**	**NF**	
2nd layer	Yellow mastic	‘’	NAD	NF	
2011-38	**Vinyl floor tile, 9x9, tan with brown splotches**	**Kitchen, floor, main flooring**	**3% CH**	**NF**	
2nd layer	**Black mastic**	‘’	**5% CH**	**NF**	
2011-39	**Vinyl floor tile, 9x9, tan with brown splotches**	**Judge’s Chambers, floor**	**PACM**	**NF**	**NA/PS**
2nd layer	**Black mastic**	‘’	**PACM**	**NF**	**NA/PS**
2011-40	**Vinyl floor tile, 9x9, tan with brown splotches**	**Office 1, floor**	**PACM**	**NF**	**NA/PS**
2nd layer	**Black mastic**	‘’	**PACM**	**NF**	**NA/PS**
2011-41	**Vinyl floor tile, 9x9, tan with brown splotches**	**Office 2, floor**	**PACM**	**NF**	**NA/PS**
2nd layer	**Black mastic**	‘’	**PACM**	**NF**	**NA/PS**
2011-42	**Vinyl floor tile, 9x9, light gray with gold streaks**	**Office 2, floor, patch**	**3% CH**	**NF**	
2nd layer	**Yellow glue**	‘’	**<1% CH**	**NF**	
2011-43	**Vinyl floor tile, dark gray with multicolor streaks**	**Office 2, floor, patch**	**3% CH**	**NF**	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2nd layer	Yellow glue	‘’	NAD	NF	
2011-44	**Vinyl floor tile, 9x9, brown with brown streaks**	**Office 1, floor, patch**	**2% CH**	**NF**	
2nd layer	**Black mastic**	**‘’**	**2% CH**	**NF**	
2011-45	**Vinyl floor tile, 9x9, cream with brown streaks**	**Office 1, floor, patch**	**3% CH**	**NF**	
2nd layer	**Black mastic**	**‘’**	**8% CH**	**NF**	
2011-46	Composite board, gray	Exterior, on back deck	NAD	NF	
2011-47	Fiberboard, brown with black paper	Exterior, under wood siding	NAD	NF	
2011-48	Fiberboard, brown with black paper	Exterior, under wood siding	NAD	NF	
2011-49	Concrete, gray	Exterior, back stairs/walk	NAD	NF	
2011-50	Concrete, gray	Exterior, perimeter foundation	NAD	NF	
2011-51	Concrete, gray	Exterior, perimeter foundation	NAD	NF	
2011-52	Concrete, gray	Exterior, perimeter foundation	NAD	NF	
2011-53	Concrete, gray	Exterior, front stairs/ landing	NAD	NF	
2011-54	Brick, red	Exterior, brick planter	NAD	NF	
2011-55	Brick, red	Exterior, brick planter	NAD	NF	
2011-56	Mortar, gray	Exterior, brick planter	NAD	NF	
2011-57	Mortar, gray	Exterior, brick planter	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2011-58	Roofing, gray torch down comp	Roof, entry, main membrane	NAD	NF	
2011-59	Roofing, gray torch down comp	Roof, main membrane	NAD	NF	
2011-60	Roofing, gray torch down comp	Roof, main membrane	NAD	NF	
2011-61	Roofing, gray torch down comp	Roof, main membrane	NAD	NF	
2011-62	Roofing, gray torch down comp	Roof, main membrane	NAD	NF	
2011-63	Vinyl membrane, white	Roof, main membrane	NAD	NF	
2011-64	Fiberboard, brown	Roof, main membrane	NAD	NF	
2011-65	Fiberboard, brown	Roof, main membrane	NAD	NF	
2011-66	Fiberboard, brown	Roof, main membrane	NAD	NF	
2011-67	Fiberboard, brown	Roof, main membrane	NAD	NF	
2011-68	No Sample	-	-	-	-
2011-69	Rubber, white	Roof, paint on main membrane	NAD	NF	
2011-70	**Roof patch, gray**	**Roof, parapet wall cap seam**	**5% CH**	**NF**	
2011-71	**Roof patch, gray**	**Roof, parapet wall cap seam**	**PACM**	**NF**	**NA/PS**
2011-72	**Roof patch, gray**	**Roof, septic vent**	**PACM**	**NF**	**NA/PS**
2011-73	**Roof patch, gray**	**Roof, septic vent**	**PACM**	**NF**	**NA/PS**
2011-74	**Roof patch, gray**	**Roof, exhaust vent**	**PACM**	**NF**	**NA/PS**
2011-75	Silver paint	Roof, exhaust vent	NAD	NF	
2011-76	Silver paint	Roof, exhaust vent	NAD	NF	

TABLE 1
SUMMARY OF ASBESTOS ANALYTIC DATA

Garberville Veterans Building
483 Conger St., Garberville, CA

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
2011-77	Roll roofing, brown comp	Back porch roof, main membrane	NAD	NF	
2011-78	Tarpaper, black	Back porch roof, main membrane	NAD	NF	
2011-79	Roofing, brown comp shingle	Back porch roof, main membrane	NAD	NF	
2011-80	Tarpaper, black	Back porch roof, main membrane	NAD	NF	
2011-81	**Pipe insulation, 4", white cardboard**	**Crawlspace, on hot water pipe**	**55% CH**	**F**	
2011-82	**Pipe insulation, 4", white cardboard**	**Crawlspace, on hot water pipe**	**PACM**	**F**	**NA/PS**
2011-83	**Pipe insulation, 4", white cardboard**	**Crawlspace, on hot water pipe**	**PACM**	**F**	**NA/PS**

ACCM = Asbestos Containing Construction Materials, asbestos content of 0.1% to 1.0 %

ACM = Asbestos Containing Material, materials that contain >1% asbestos

Bold Type = materials found to contain asbestos

CH = Chrysotile Asbestos

F = "Friable," asbestos material defined as: material containing >1% asbestos, that when dry, may be crumbled, pulverized, or reduced to powder by hand pressure

NAD = No Asbestos Detected

NA/PS = Not analyzed/Positive stop, stopped analysis after 1st positive test for identical material (see prev. sample)

NF = Non-friable

PACM = Presumed ACM

<1% = less than 1% asbestos content

Note: Some samples had multiple layers analyzed separately

TABLE 3
XRF PAINT SAMPLING DATA

Garberville Veterans Building
483 Conger Street
Garberville, CA

XRF Lead Paint Analyzer:

Heuresis Corp.
Model: Pb200i
Serial# 1566

Calibration:

Standard Reference Material: lead content of 1.04 mg/cm^2 ±0.0643
Response Verification Check Range: 0.8 mg/cm^2 to 1.2 mg/cm^2
Note: for Performance Characteristic Sheet (PCS) compliance, the average of three calibration readings must fall within the "Response Verification Check Range."

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm^2)	Paint Classification	Surface Coating Material	Color	Substrate
1	Calibration	Standard Reference Material	0.9	--	--	--	--
2	Calibration	Standard Reference Material	1.0	--	--	--	--
3	Calibration	Standard Reference Material	0.9	--	--	--	--
4	Gathering room	Hardwood floor	0.0	NEG	Stain	Clear	Wood
5	Court room	Hardwood floor	-0.1	NEG	Stain	Clear	Wood
6	Court room	Wall panel	-0.1	NEG	Stain	Brown	Plywood

NEG = Negative (<0.1 mg/cm^2)
LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm^2 & <1.0 mg/cm^2)
LBP=Lead Based Paint (≥1.0 mg/cm^2)

TABLE 3
XRF PAINT SAMPLING DATA

Garberville Veterans Building
483 Conger Street
Garberville, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
7	Hall	Wall panel	0.0	NEG	Stain	Brown	Plywood
8	Gathering room	Door	0.2	LCSC	Stain	Brown	Wood
9	Kitchen	Folding window shutters	0.0	NEG	Stain	Brown	Wood
10	Kitchen	Upper cabinet door	-0.1	NEG	Paint	Tan	Wood
11	Kitchen	Lower cabinet drawer	-0.1	NEG	Paint	Pink	Wood
12	Kitchen	Window trim	-0.1	NEG	Paint	Orange	Wood
13	Kitchen	Wall	0.1	LCSC	Paint	White	Drywall
14	Kitchen	Door trim	0.0	NEG	Paint	Orange	Wood
15	Kitchen	Door	0.2	LCSC	Paint	Gray	Metal
16	Court room	Ceiling beam	-0.1	NEG	Paint	Red	Wood
17	Judge's Chamber	Window trim	-0.1	NEG	Stain	Brown	Wood
18	Office 1	Door	0.0	NEG	Stain	Brown	Wood
19	Office 2	Cabinet	0.0	NEG	Paint	Brown	Wood

NEG = Negative (<0.1 mg/cm^2)
LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm^2 & <1.0 mg/cm^2)
LBP=Lead Based Paint (≥ 1.0 mg/cm^2)

TABLE 3
XRF PAINT SAMPLING DATA

Garberville Veterans Building
483 Conger Street
Garberville, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
20	Hall	Ceiling beam	-0.1	NEG	Stain	Brown	Wood
21	Hall	Ceiling panel	0.0	NEG	Paint	White	Fiberboard
22	Men's RR	Window trim	-0.1	NEG	Paint	Tan	Wood
23	Men's RR	Toilet stall	0.1	LCSC	Paint	Tan	Metal
24	Men's RR	Sink	13.3	LBP	Glazing	White	Ceramic
25	Men's RR	Toilet	16.6	LBP	Glazing	White	Ceramic
26	Women's RR	Wall	0.1	LCSC	Paint	White	Drywall
27	Exterior	Siding	0.0	NEG	Paint	Light blue	Wood
28	Exterior	Siding	-0.1	NEG	Paint	Light blue	Wood
29	Exterior	Siding	0.2	LCSC	Paint	Light blue	Wood
30	Exterior	Foundation	0.1	LCSC	Paint	Green	Concrete
31	Exterior	Windowsill	0.0	NEG	Paint	Green	Wood
32	Exterior	Window trim	0.1	LCSC	Paint	Tan	Wood
33	Exterior	Railing	0.0	NEG	Paint	Green	Metal

NEG = Negative (<0.1 mg/cm^2)
LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm^2 & <1.0 mg/cm^2)
LBP=Lead Based Paint (≥ 1.0 mg/cm^2)

TABLE 3
XRF PAINT SAMPLING DATA

Garberville Veterans Building
483 Conger Street
Garberville, CA

Reading #	Sample Location	Component Description	Lead Concentration ($mg/cm^{2)}$	Paint Classification	Surface Coating Material	Color	Substrate
34	Exterior	Siding	0.0	NEG	Paint	Light green	Wood
35	Exterior	Windowsill	-0.1	NEG	Paint	Green	Wood
36	Exterior	Window trim	-0.1	NEG	Paint	Tan	Wood
37	Calibration	Standard Reference Material	0.9	--	--	--	--
38	Calibration	Standard Reference Material	1.0	--	--	--	--
39	Calibration	Standard Reference Material	0.9	--	--	--	--

NEG = Negative (<0.1 mg/cm^2)
LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm^2 & <1.0 mg/cm^2)
LBP=Lead Based Paint (≥1.0 mg/cm^2)

TABLE 4
LEAD WASTE CHARACTERIZATION

Garberville Veterans Building
483 Conger Street
Garberville, CA

SAMPLE ID	TTLC for Lead mg/kg (ppm)	STLC for Lead mg/L	TCLP for Lead mg/L	Disposal Requirements
2011- LWA Combined anticipated demolition waste stream* for the entire Building	11 mg/kg (ppm)	Not required as TTLC was <50 mg/kg (ppm)	0.053 mg/L	Non-Hazardous Waste, dispose as "General Construction Debris" at a Class 3 landfill

* Excluding any Asbestos Containing Materials (ACM)

TTLC = Total Threshold Concentration Limit, by EPA 3050B/7000B (California initial test)
TTLC results of: ≥ 1,000 mg/kg lead content are considered hazardous waste by California standards (22 CCR 66261.24)

STLC = Soluble Threshold Limit Concentration (California waste "wet" test), by EPA 3010A/6010C
STLC results of: ≥ 5.0 mg/L lead content are considered hazardous waste by California standards (22 CCR 66261.24)

TCLP = Toxicity Characterization Leaching Procedure (Federal waste "wet" test), by SW-846 1311 EPA 3010A/7000B
TCLP results of: ≥ 5.0 mg/L lead content are considered hazardous waste by federal standards (40 CFR 261.24), and by California standards (22 CCR 66261.24)

RCRA = Resource Conservation and Recovery Act (40 CFR 239-282)

AmeriSci Richmond
13635 GENITO ROAD
MIDLOTHIAN, VIRGINIA 23112
TEL: (804) 763-1200 • FAX: (804) 763-1800

PLM Bulk Asbestos Report

Brunelle & Clark Consulting, LLC
Attn: Zindar Brunelle
PO Box 1138

Arcata, CA 95518

Date Received 12/23/20
Date Examined 12/29/20

AmeriSci Job # 120122049
P.O. #
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RE: 2000311; Garberville Veterans Bldg; 483 Conger St, Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-1	120122049-01	*No*	NAD (by CVES) by Jean L. Mayes on 12/29/20
Location: CP, 2' Wide, White & Brown Fiberboard; Gathering Room/Ceiling			
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 95 %, Non-fibrous 5 %			
2011-2	120122049-02	*No*	NAD (by CVES) by Jean L. Mayes on 12/29/20
Location: CP, 2' Wide, White & Brown Fiberboard; Court Room/Ceiling			
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 95 %, Non-fibrous 5 %			
2011-3	120122049-03	*No*	NAD (by CVES) by Jean L. Mayes on 12/29/20
Location: CP, 2' Wide, White & Brown Fiberboard; Hall/Ceiling			
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 95 %, Non-fibrous 5 %			
2011-4	120122049-04	*No*	NAD (by CVES) by Jean L. Mayes on 12/29/20
Location: Tarpaper, Black; Gathering Room/On Sub Floor			
Analyst Description: Black, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 75 %, Non-fibrous 25 %			
2011-5	120122049-05	*No*	NAD (by CVES) by Jean L. Mayes on 12/29/20
Location: Door Core, Yellow Foam; KN/Exterior Door			
Analyst Description: White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-6	120122049-06	***No***	NAD
Location: Caulking, White; HVAC Closet/HVAC Duct			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-7	120122049-07	***No***	NAD
Location: Glue, Tan; M RR/FRP			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-8	120122049-08.1	***No***	NAD
Location: JC/GB; M RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-8	120122049-08.2	***Yes***	2 %
Location: JC/GB; M RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-9	120122049-09.1	***No***	NAD
Location: JC/GB; M RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-9	120122049-09.2	***Yes***	2 %
Location: JC/GB; M RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-10	120122049-10.1	***No***	NAD
Location: JC/GB; W RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-10	120122049-10.2	***Yes***	2 %
Location: JC/GB; W RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-11	120122049-11.1	***No***	NAD
Location: JC/GB; W RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-11	120122049-11.2	***Yes***	2 %
Location: JC/GB; W RR/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-12	120122049-12.1	***No***	NAD
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-12	120122049-12.2	***Yes***	2 %
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-13	120122049-13.1	***No***	NAD
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-13	120122049-13.2	***Yes***	2 %
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-14	120122049-14.1	***No***	NAD
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: White/Brown, Heterogeneous, Non-Fibrous, Gypsum Board **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-14	120122049-14.2	***Yes***	2 %
Location: JC/GB; KN/Wall			(by CVES) by Jean L. Mayes on 12/29/20
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Joint Compound **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-15	120122049-15	***No***	NAD
Location: Carpet Underlay, Brown Fabric; Court Room/Floor/Under Carpet			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 95 %, Non-fibrous 5 %			
2011-16	120122049-16	***No***	NAD
Location: Tarpaper, Black; Court Room/Floor/On Sub Floor			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 75 %, Non-fibrous 25 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-17	120122049-17	***No***	NAD
	Location: Tarpaper, Black; W RR/Floor/On Sub Floor		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 75 %, Non-fibrous 25 %			
2011-18	120122049-18	***No***	NAD
	Location: BBM, Tan; Hall/Vinyl Baseboard		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-19	120122049-19	***No***	NAD
1	**Location:** BBM, Dark Brown; Hall/Vinyl Baseboard		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-20	120122049-20	***No***	NAD
1	**Location:** BBM, Dark Brown; Hall/Vinyl Baseboard		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-21	120122049-21	***No***	NAD
1	**Location:** BBM, Dark Brown; Judge's Chamber/Vinyl Baseboard		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-22	120122049-22	***No***	NAD
1	**Location:** BBM, Dark Brown; Off 1/Vinyl Baseboard		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-23 1	120122049-23 **Location:** BBM, Dark Brown; KN/Vinyl Baseboard	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-24	120122049-24 **Location:** BBM, Tan; M RR/Vinyl Baseboard	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-25 2	120122049-25 **Location:** BBM, Dark Brown; M RR/Vinyl Baseboard	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-26 2	120122049-26 **Location:** BBM, Dark Brown; W RR/Vinyl Baseboard	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-27 3	120122049-27L1 **Location:** VFT, 12x12, Gray/Yellow Glue; W RR/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-27 3	120122049-27L2 **Location:** VFT, 12x12, Gray/Yellow Glue; W RR/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-28	120122049-28L1	***No***	NAD
3	**Location:** VFT, 12x12, Gray/Yellow Glue; M RR/Floor		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-28	120122049-28L2	***No***	NAD
3	**Location:** VFT, 12x12, Gray/Yellow Glue; M RR/Floor		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-29	120122049-29L1	***Yes***	4 %
4	**Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile 4.0 % **Other Material:** Non-fibrous 96 %			
2011-29	120122049-29L2	***No***	NAD
4	**Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Leveling Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-30	120122049-30L1		NA/PS
4	**Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-30	120122049-30L2		NA
	Location: Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		
Analyst Description: Leveling Compound **Asbestos Types:** **Other Material:** **Comment:** Quantity Insufficient For Analysis			
2011-31 4	120122049-31L1 **Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
2011-31 4	120122049-31L2 **Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Leveling Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-32 4	120122049-32L1 **Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
2011-32 4	120122049-32L2 **Location:** Floor Leveling, Gray/Black Mastic; Hall/Floor/Under Carpet	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Leveling Compound **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-33 5	120122049-33L1 **Location:** SF, Brown Slate Pattern/Yellow Glue; Mech Closet/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-33 5	120122049-33L2 **Location:** SF, Brown Slate Pattern/Yellow Glue; Mech Closet/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-34 5	120122049-34L1 **Location:** SF, Brown Slate Pattern/Yellow Glue; Mech Closet/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 10 %, Non-fibrous 90 %			
2011-34 5	120122049-34L2 **Location:** SF, Brown Slate Pattern/Yellow Glue; Mech Closet/Floor	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-35 6	120122049-35L1 **Location:** SF, Tan Squares/Yellow Glue; KN/Floor/Small Patch	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 15 %, Non-fibrous 85 %			
2011-35 6	120122049-35L2 **Location:** SF, Tan Squares/Yellow Glue; KN/Floor/Small Patch	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St, Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-36 6	120122049-36L1	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: SF, Tan Squares/Yellow Glue; KN/Floor/Small Patch		
	Analyst Description: Tan, Heterogeneous, Non-Fibrous, Sheet Flooring **Asbestos Types:** **Other Material:** Cellulose 15 %, Non-fibrous 85 %		
2011-36 6	120122049-36L2	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: SF, Tan Squares/Yellow Glue; KN/Floor/Small Patch		
	Analyst Description: White, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %		
2011-37	120122049-37L1	***Yes***	4 % (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Dark Brown W/Splotches/Yellow Mastic; KN/Floor/Strip Around SF Section		
	Analyst Description: Brown, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 4.0 % **Other Material:** Non-fibrous 96 %		
2011-37	120122049-37L2	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Dark Brown W/Splotches/Yellow Mastic; KN/Floor/Strip Around SF Section		
	Analyst Description: Yellow, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %		
2011-38 7	120122049-38L1	***Yes***	3 % (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; KN/Floor/Main Flooring		
	Analyst Description: Tan, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 3.0 % **Other Material:** Non-fibrous 97 %		
2011-38 7	120122049-38L2	***Yes***	5 % (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; KN/Floor/Main Flooring		
	Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile 5.0 % **Other Material:** Non-fibrous 95 %		

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-39 7	120122049-39L1 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Judge's Chamber/Floor		NA/PS
Analyst Description: Floor Tile **Asbestos Types:** **Other Material:**			
2011-39 7	120122049-39L2 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Judge's Chamber/Floor		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
2011-40 7	120122049-40L1 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Office 1/Floor		NA/PS
Analyst Description: Floor Tile **Asbestos Types:** **Other Material:**			
2011-40 7	120122049-40L2 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Office 1/Floor		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			
2011-41 7	120122049-41L1 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Office 2/Floor		NA/PS
Analyst Description: Floor Tile **Asbestos Types:** **Other Material:**			
2011-41 7	120122049-41L2 **Location:** VFT, 9x9, Tan W/ Brown Splotches/Black Mastic; Office 2/Floor		NA/PS
Analyst Description: Mastic **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St, Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-42	120122049-42L1	***Yes***	3 %
7	**Location:** VFT, 9x9, Light Gray With Gold Streaks/Yellow Glue; Office 2/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 3.0 % **Other Material:** Non-fibrous 97 %			
2011-42	120122049-42L2	***Yes***	Trace (<1 %)
7	**Location:** VFT, 9x9, Light Gray With Gold Streaks/Yellow Glue; Office 2/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Yellow/Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile <1. % **Other Material:** Non-fibrous 100 %			
2011-43	120122049-43L1	***Yes***	3 %
7	**Location:** VFT, 9x9, Dark Gray With Multicolor Streaks/Yellow Glue; Office 2/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 3.0 % **Other Material:** Non-fibrous 97 %			
2011-43	120122049-43L2	***No***	NAD
7	**Location:** VFT, 9x9, Dark Gray With Multicolor Streaks/Yellow Glue; Office 2/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-44	120122049-44L1	***Yes***	2 %
7	**Location:** VFT, 9x9, Brown With Brown Streaks/Black Mastic; Office 1/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			
2011-44	120122049-44L2	***Yes***	2 %
7	**Location:** VFT, 9x9, Brown With Brown Streaks/Black Mastic; Office 1/Floor/Patch		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile 2.0 % **Other Material:** Non-fibrous 98 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St, Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-45 7	120122049-45L1	***Yes***	3 % (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Cream With Brown Streaks/Black Mastic; Office 1/Floor/Patch		
Analyst Description: Cream, Heterogeneous, Non-Fibrous, Floor Tile **Asbestos Types:** Chrysotile 3.0 % **Other Material:** Non-fibrous 97 %			
2011-45 7	120122049-45L2	***Yes***	8 % (by CVES) by Jean L. Mayes on 12/28/20
	Location: VFT, 9x9, Cream With Brown Streaks/Black Mastic; Office 1/Floor/Patch		
Analyst Description: Black, Heterogeneous, Non-Fibrous, Mastic **Asbestos Types:** Chrysotile 8.0 % **Other Material:** Non-fibrous 92 %			
2011-46	120122049-46	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: Composite Board, Gray; Ext/On Back Deck		
Analyst Description: Gray, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 60 %, Non-fibrous 40 %			
2011-47	120122049-47	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: Fiberboard, Brown/Black Tarpaper; Ext/Under Wood Siding		
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 90 %, Non-fibrous 10 %			
2011-48	120122049-48	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: Fiberboard, Brown/Black Tarpaper; Ext/Under Wood Siding		
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 90 %, Non-fibrous 10 %			
2011-49	120122049-49	***No***	NAD (by CVES) by Jean L. Mayes on 12/28/20
	Location: Concrete, Gray; Ext/Back Stairs-Walk		
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-50	120122049-50	***No***	NAD
Location: Concrete, Gray; Ext/Perimeter-Foundation			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2011-51	120122049-51	***No***	NAD
Location: Concrete, Gray; Ext/Perimeter-Foundation			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2011-52	120122049-52	***No***	NAD
Location: Concrete, Gray; Ext/Perimeter-Foundation			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2011-53	120122049-53	***No***	NAD
Location: Concrete, Gray; Ext/Front Stairs-Landing			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2011-54	120122049-54	***No***	NAD
Location: Brick, Red; Ext/Brick Planter			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Red, Heterogeneous, Non-Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			
2011-55	120122049-55	***No***	NAD
Location: Brick, Red; Ext/Brick Planter			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Red, Heterogeneous, Non-Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Non-fibrous 100 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-56	120122049-56	***No***	NAD
Location: Mortar, Grey; Ext/Brick Planter			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-57	120122049-57	***No***	NAD
Location: Mortar, Grey; Ext/Brick Planter			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-58	120122049-58	***No***	NAD
Location: Roofing, Gray Torch Down Comp; Roof/Entry/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 15 %, Non-fibrous 85 %			
2011-59	120122049-59	***No***	NAD
Location: Roofing, Gray Torch Down Comp; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 20 %, Non-fibrous 80 %			
2011-60	120122049-60	***No***	NAD
Location: Roofing, Gray Torch Down Comp; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 15 %, Non-fibrous 85 %			
2011-61	120122049-61	***No***	NAD
Location: Roofing, Gray Torch Down Comp; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 15 %, Non-fibrous 85 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-62	120122049-62	***No***	NAD
Location: Roofing, Gray Torch Down Comp; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Fibrous glass 10 %, Non-fibrous 90 %			
2011-63	120122049-63	***No***	NAD
Location: Vinyl Membrane, White; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Green, Heterogeneous, Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Synthetic fibers 90 %, Non-fibrous 10 %			
2011-64	120122049-64	***No***	NAD
Location: Fiberboard, Brown; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Cellulose 95 %, Non-fibrous 5 %			
2011-65	120122049-65	***No***	NAD
Location: Fiberboard, Brown; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Cellulose 95 %, Non-fibrous 5 %			
2011-66	120122049-66	***No***	NAD
Location: Fiberboard, Brown; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Cellulose 95 %, Non-fibrous 5 %			
2011-67	120122049-67	***No***	NAD
Location: Fiberboard, Brown; Roof/Main Membrane			(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Brown, Heterogeneous, Fibrous, Bulk Material			
Asbestos Types:			
Other Material: Cellulose 95 %, Non-fibrous 5 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-69	120122049-68	***No***	NAD
	Location: Rubber, White; Roof/Paint On Main Membrane		(by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Gray, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Non-fibrous 100 %			
2011-70 8	120122049-69 **Location:** Roof Patch, Gray; Roof/Parapet Wall Capseam	***Yes***	5 % (by CVES) by Jean L. Mayes on 12/28/20
Analyst Description: Black, Heterogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** Chrysotile 5.0 % **Other Material:** Non-fibrous 95 %			
2011-71 8	120122049-70 **Location:** Roof Patch, Gray; Roof/Parapet Wall Capseam		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			
2011-72 8	120122049-71 **Location:** Roof Patch, Gray; Roof/Septic Vent		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			
2011-73 8	120122049-72 **Location:** Roof Patch, Gray; Roof/Septic Vent		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			
2011-74 8	120122049-73 **Location:** Roof Patch, Gray; Roof/Exhaust Vent		NA/PS
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-759	120122049-74		NA
Location: Silver Paint; Roof/Exhaust Vent (Sample on report 120-12-2088)			
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			
2011-769	120122049-75		NA
Location: Silver Paint; Roof/Exhaust Vent (Sample on report 120-12-2088)			
Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**			

Reporting Notes:

Analyzed by: Jean L. Mayes
Date: 12/29/2020

Reviewed by: Jean L. Mayes

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Olympus, Model BH-2 microscope, Serial #232420, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

AmeriSci Richmond
13635 GENITO ROAD
MIDLOTHIAN, VIRGINIA 23112
TEL: (804) 763-1200 • FAX: (804) 763-1800

PLM Bulk Asbestos Report

Brunelle & Clark Consulting, LLC
Attn: Zindar Brunelle
PO Box 1138

Arcata, CA 95518

Date Received 12/28/20
Date Examined 12/28/20

AmeriSci Job # 120122088
P.O. #
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RE: 2000311; Garberville Veterans Bldg; 483 Conger St, Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-75 1	120122088-01 **Location:** Silver Paint; Roof/Exhaust Vent	***No***	NAD (by CVES) by Gordon T. Saleeby on 12/28/20
Analyst Description: Silver, Homogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 2 %, Non-fibrous 98 %			
2011-76 1	120122088-02 **Location:** Silver Paint; Roof/Exhaust Vent	***No***	NAD (by CVES) by Gordon T. Saleeby on 12/28/20
Analyst Description: Silver, Homogeneous, Non-Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 2 %, Non-fibrous 98 %			
2011-77	120122088-03 **Location:** Roll Roofing Brown Comp; Back Porch Roof/Main Membrane	***No***	NAD (by CVES) by Gordon T. Saleeby on 12/28/20
Analyst Description: Black/Brown, Homogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 7 %, Non-fibrous 93 %			
2011-78	120122088-04 **Location:** Tarpaper Black; Back Porch Roof/Main Membrane	***No***	NAD (by CVES) by Gordon T. Saleeby on 12/28/20
Analyst Description: Black, Homogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 80 %, Non-fibrous 20 %			
2011-79	120122088-05 **Location:** Roofing Brown Comp Shingle; Back Porch Roof/Main Membrane	***No***	NAD (by CVES) by Gordon T. Saleeby on 12/28/20
Analyst Description: Black/Brown, Homogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Fibrous glass 7 %, Non-fibrous 93 %			

See Reporting notes on last page

PLM Bulk Asbestos Report

2000311; Garberville Veterans Bldg; 483 Conger St,
Garberville, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-80	120122088-06	***No***	NAD
	Location: Tarpaper Black; Back Porch Roof/Main Membrane		(by CVES) by Gordon T. Saleeby on 12/28/20
	Analyst Description: Black, Homogeneous, Fibrous, Bulk Material **Asbestos Types:** **Other Material:** Cellulose 80 %, Non-fibrous 20 %		
2011-81 2	120122088-07	***Yes***	55 %
	Location: Pipe Insulation (4") White Cardboard; Crawlspace/On Hot Water Pipe		(by CVES) by Gordon T. Saleeby on 12/28/20
	Analyst Description: White/Lt. Gray, Homogeneous, Fibrous, Bulk Material **Asbestos Types:** Chrysotile 55.0 % **Other Material:** Cellulose 25 %, Non-fibrous 20 %		
2011-82 2	120122088-08		NA/PS
	Location: Pipe Insulation (4") White Cardboard; Crawlspace/On Hot Water Pipe		
	Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**		
2011-83 2	120122088-09		NA/PS
	Location: Pipe Insulation (4") White Cardboard; Crawlspace/On Hot Water Pipe		
	Analyst Description: Bulk Material **Asbestos Types:** **Other Material:**		

Reporting Notes:

Analyzed by: Gordon T. Saleeby
Date: 12/28/2020

Reviewed by: Gordon T. Saleeby

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Olympus, Model BH-2 microscope, Serial #237649, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

AmeriSci Richmond
13635 GENITO ROAD
MIDLOTHIAN, VIRGINIA 23112
TEL: (804) 763-1200 • FAX: (804) 763-1800

PLM Bulk Asbestos Report

Brunelle & Clark Consulting, LLC
Attn: Zindar Brunelle
PO Box 1138

Arcata, CA 95518

Date Received 12/30/20
Date Examined 12/30/20

AmeriSci Job # 120122138
P.O. #
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RE: 2000311; Garberville Veterans; Bldg 483 Conger St, Garberville, CA (Reference: 120-12-2049)

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
2011-8	120122138-01	***Yes***	0.8 % pc (by 400 pt ct) by Eric H. Ahles on 12/30/20
Location: JC/GB; M RR / Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Composite **Asbestos Types:** Chrysotile 0.8 % **Other Material:** , Cellulose 4 %, Non-fibrous 95.3 %			
2011-12	120122138-02	***Yes***	0.3 % pc (by 400 pt ct) by Eric H. Ahles on 12/30/20
Location: JC/GB; KN / Wall			
Analyst Description: White, Heterogeneous, Non-Fibrous, Composite **Asbestos Types:** Chrysotile 0.3 % **Other Material:** , Cellulose 4 %, Non-fibrous 95.8 %			

Reporting Notes:

Analyzed by: Eric H. Ahles
Date: 12/30/2020

Reviewed by: Eric H. Ahles

*NAD = no asbestos detected, Detection Limit <1%, Reporting Limits: CVES = 1%, 400 Pt Ct = 0.25%, 1000 Pt Ct = 0.1%; "Present" or NVA = "No Visible Asbestos" are observations made during a qualitative analysis; NA = not analyzed; NA/PS = not analyzed / positive stop; PLM Bulk Asbestos Analysis using Meiji, Model MT 6130 microscope, Serial #1410298, by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) and ELAP PLM Analysis Protocol 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NYSDOH ELAP Lab # 10984); CA ELAP Lab # 2508; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar NOB materials. NAD or Trace results by PLM are inconclusive, TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in New York State (also see EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). NIST Accreditation requirements mandate that this report must not be reproduced except in full without the approval of the laboratory. This PLM report relates ONLY to the items tested.

Client Name: Brunelle & Clark Consulting, LLC

Table I
Summary of Bulk Asbestos Analysis Results

2000311; Garberville Veterans; Bldg 483 Conger St, Garberville, CA (Reference: 120-12-2049)

AmeriSci Sample #	Client Sample#	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS	** Asbestos % by TEM
01	2011-27		0.541	17.6	63.1	19.3	NA	NAD

Location: VFT, 12x12, Gray / Yellow Glue; W RR / Floor

Analyzed by: Cory M. Parnell 

Reviewed by: Cory M. Parnell 

Date: 12/30/2020

Semi-Quantitative Analysis: NAD = no asbestos detected; NA = not analyzed; NA/PS = not analyzed due to positive stop; Trace = <1%; PLM analysis by EPA 600/R-93/116 per 40 CFR 763 (NVLAP Lab Code 101904-0) or NY ELAP 198.1 for New York friable samples which includes quantitation of any vermiculite observed (198.6 for NOB samples) or EPA 400 pt ct by EPA 600/M4-82-020 (NY ELAP Lab # 10984); TEM prep by EPA 600/R-93/116 Section 2.3 (analysis by Section 2.5, not covered by NVLAP Bulk accreditation); or NY ELAP 198.4 for New York NOB samples (NY ELAP Lab # 10984); ** Warning Notes: Consider PLM fiber diameter limitation, only TEM will resolve fibers <0.25 micrometers in diameter. TEM bulk analysis is representative of the fine grained matrix material and may not be representative of non-uniformly dispersed debris, soils or other heterogeneous materials for which a combination PLM/TEM evaluation is recommended; Quantitation for beginning weights of <0.1 grams should be considered as qualitative only.

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 12/20/20
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

120122049

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011- 1	CP, 2' wide, white & brown fiberboard	1	Gathering room / Ceiling	MM	F
- 2	↓	1	Court room / ↓	↓	↓
- 3	↓	1	Hall / ↓	↓	↓
- 4	Tarpaper, black	2	Gathering room / sub floor on	↓	NF
- 5	Door core, yellow foam	3	KN / Exterior door	TSI	F
- 6	caulking, white	4	HVAC closet / HVAC duct	MM	NF
- 7	glue, tan	5	M. RR / FRP	↓	↓
- 8	JC/GB	6	↓ / wall	↓	↓
- 9	↓	6	↓ / ↓	↓	↓
- 10	↓	6	W. RR / ↓	↓	↓
- 11	↓	6	↓ / ↓	↓	↓
- 12	↓	6	KN / ↓	↓	↓
- 13	↓	6	↓ / ↓	↓	↓
- 14	↓	6	↓ / ↓	↓	↓
- 15	Carpet underlay, brown fabric	7	court room / floor / under carpet	↓	F

Sample Abbreviations
Hom. Area = Homogenous Area
VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
BBM = Baseboard Mastic
CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

* = Stop analysis for any layer at first positive, if >1%, where indicated.

Sampled by: Zindar Brunelle	Received by:
Relinquished by: 12/21/20 Date/Time:	Signature: Date/Time:

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Analysis: X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 12/20/20 Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

120122049

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-16	Tarpaper, black	Z	court room / floor / sub on floor	MM	NF
- 17	↓	Z	W. RR / floor / ↓		
- 18	BBM, tan	8	hall / vinyl baseboard		
- 19	BBM, dark brown	9	↓		
- 20	↓	9	↓		
- 21	↓	9	Judge's Chamber /		
- 22	↓	9	Off 1 /		
- 23	↓	9	KN /		
- 24	BBM, tan	10	M. RR /		
- 25	BBM, dark brown	9	M. RR /		
- 26	↓	9	W. RR / ↓		
- 27	VFT, 12 x 12, gray / yellow glue	11	W. RR / floor		
- 28	↓ / ↓	11	M. RR / floor		
- 29	Floor leveling, gray / Black Mastic	12	hall / floor / under carpet		
- 30	↓ / ↓	12	↓ / ↓ / ↓	↓	↓

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BBM = Baseboard Mastic
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CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

Stop analysis for any layer at first positive, if <1%, where indicated.

RECEIVED
DEC 23 2020
By

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Zindar Brunelle 12/21/20 Date/Time:	Signature: Date/Time:

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 12/20/20
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

1201220 49

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-31	Floor leveling, gray / black mastic	12	Hall / floor / under carpet	MM	NF
- 32	↓ / ↓	12	↓ / ↓ / ↓		↓
- 33	SF, brown slate pattern / yellow glue	13	Mech closet / floor		F
- 34	↓ / ↓	13	↓ / ↓		
- 35	SF, tan squares / yellow glue	14	KN / floor / small patch		
- 36	↓ / ↓	14	↓ / ↓ / ↓		↓
- 37	VFT, 9x9, dark brown w/ splotches / yellow mastic	15	KN / floor / strip around SF section		NF
- 38	VFT, 9x9, tan w/ brown splotches / black mastic	16	↓ / ↓ / main flooring		
- 39	↓ / ↓	16	Judge's chamber / floor		
- 40	↓ / ↓	16	office 1 / floor		
- 41	↓ / ↓	16	office 2 / floor		
- 42	VFT, 9x9, light gray with gold streaks / yellow glue	17	↓ / floor / patch		
- 43	VFT, 9x9, dark gray with multicolor streaks / ↓	18	↓ / ↓ / ↓		
- 44	VFT, 9x9, brown with brown streaks / black mastic	19	office 1 / ↓ / ↓		
- 45	VFT, 9x9, cream with Brown streaks / Black Mastic	20	↓ / ↓ / ↓	↓	↓

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CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

* = Stop analysis for any layer at first positive if "Yes" is indicated.

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DEC 23 2020
By

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Zindar Brunelle 12/21/20 Date/Time:	Signature: Date/Time:

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 12/20/20
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

120122049

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-46	Composite board, gray	21	Ext. / on back deck	MM	NF
-47	Fiberboard, brown / black tarpaper	22	/ under wood siding		F
-48	↓ / ↓	22	/ ↓		↓
-49	Concrete, gray	23	/ back stairs-walk		NF
-50	↓	23	/ Perimeter foundation		
-51		23	/		
-52		23	/ ↓		
-53	↓	23	/ Front stairs-landing		
-54	Brick, red	24	/ Brick planter		
-55	↓	24	/		
-56	Mortar, gray	25	/		
-57	↓	25	↓ / ↓		
-58	Roofing, gray torch down Comp.	26	Roof / entry / main membrane		
-59	↓	26	/ Main membrane		
-60	↓	26	↓ / ↓	↓	↓

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SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
BBM = Baseboard Mastic
CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

* = Stop analysis for any layer at first positive, if >1%, where indicated.

Sampled by: Zindar Brunelle	Received by:
Relinquished by: Date/Time: 12/21/20	Signature: Date/Time:

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DEC 23 2020
By

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 12/20/20
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

120122049

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-61	Roofing, gray torch down Comp.	Z6	Roof / Main Membrane	MM	NF
-62	↓	Z6	/		
-63	Vinyl Membrane, white	Z7	/		↓
-64	fiberboard, brown	Z8	/		F
-65	↓	Z8	/		
-66		Z8	/		
-67	↓	Z8	↓ / ↓	↓	↓
-68	No Sample	—			
-69	Rubber, white	Z9	Roof / Paint on Main Membrane	MM	NF
-70	Roof Patch, gray	30	/ Parapet wall capseam		
-71	↓	30	/ ↓		
-72		30	/ Septic vent		
-73		30	/ ↓		
-74	↓	30	/ Exhaust vent		
-75	Silver Paint	31	↓ / ↓	↓	↓

Sample Abbreviations
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SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
BBM = Baseboard Mastic
CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

* = Stop analysis for any layer at first positive if >1%, where indicated.

Sampled by: Zindar Brunelle	Received by: RECEIVED
Relinquished by: Zindar Brunelle Date/Time: 12/21/20	Signature: Date/Time: DEC 23 2020

By

Analysis:	BRUNELLE & CLARK CONSULTING, LLC	Date: 12/20/20
X Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Site: Garberville Veterans Bldg., 483 Conger St. Garberville, CA Proj. # 2000311

3 Day

BULK ASBESTOS SAMPLING

120122049

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-76	Silver Paint	31	Roof / Exhaust vent	MM	NF

Sample Abbreviations
Hom. Area = Homogenous Area
VFT = Vinyl Floor Tile
SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
BBM = Baseboard Mastic
CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

* = Stop analysis for any layer after positive, if >1% where indicated

Sampled by: Zindar Brunelle	Received by: RECEIVED
Relinquished by: Date/Time: 12/21/20	Signature: Date/Time: DEC 23 2020

By

120122088

Analysis: ✓ Standard PLM ___ 400 Point Count ___ 1,000 Point Count Turnaround Time: Rush/1-day/2-days/3-days/5-days	BRUNELLE & CLARK CONSULTING, LLC P.O. Box 1138 Arcata, CA 95518 Ph: (707) 822-4058 Cell #: (707) 672-5345 zbconsult@outlook.com	Date: 12/22/20 Site: Garberville Veterans Bldg. 483 Conger St. Garberville, CA Proj. # 2000311

Rush

BULK ASBESTOS SAMPLING

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
2011-75	Silver Paint	31	Roof / Exhaust vent	MM	NF
-76	↓	31	↓ / ↓	↓	↓
-77	Roll Roofing, brown comp.	32	Back Porch Roof / main membrane	↓	↓
-78	Tarpaper, black	33	↓ / main membrane	↓	↓
-79	Roofing, comp. Brown shingle	34	↓ / ↓	↓	↓
-80	Tarpaper, black	35	↓ / ↓	↓	↓
-81	Pipe Insulation (4"), white cardboard	36	Crawlspace / on hot water pipe	TSI	F
-82	↓	36	↓ / ↓	↓	↓
-83	↓	36	↓ / ↓	↓	↓

Sample Abbreviations
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SF = Sheet Flooring
JC/GB = Joint Compound/Gypsum Board
BBM = Baseboard Mastic
CT = Ceiling Tile (glued or nailed)
CP = Ceiling Panel (t-grid or drop ceil.)

Material Type
Thermal System Insulation = TSI
Misc. Material = MM
Surfacing Material = SM

Composite analysis for any layer at first positive, if >1%, where indicated.

Sampled by: Zindar Brunelle	Received by: RECEIVED
Relinquished by: Date/Time: 12/28/20	Signature: Date/Time: DEC 28 2020 By ARW

AmeriSci Los Angeles
24416 S Main St., Ste. 308
Carson, CA 90745
Phone: (310) 834-4868 Fax: (310) 834-4772

Laboratory Report

Report Date: 12/23/2020
Workorder No: **420121210**

Customer: **Brunelle & Clark Consulting, LLC**
P.O. Box 1138
Arcata, CA 95518

Attention: Zindar Brunelle

Subject: **2000311; Garberville Veterans Bldg., 483 Conger St. Garberville, CA**

Sample: 1 2011-LWA Description: Demolition Waste For The Garberville Veterans Building
Collection Date: 12/20/2020 Received Date: 12/22/2020 Time: 14:00
Matrix: Solid

Parameter	Method	Results	Unit	PQL	Tech	Analysis Date	Qual
Lead, TTLC, ICP	EPA 3050B/6010B	11	mg/kg	1.0	MP	12/23/2020	
TCLP Extraction-Metals	SW-846 Method 1311				MP	12/22/2020	
Lead, TCLP, ICP	EPA 3010A/6010B	0.053	mg/L	0.050	MP	12/23/2020	

AmeriSci Reporting Limit is represented by the PQL. The analytical results within this report relate only to the specific compounds and samples investigated, and may not necessarily reflect other apparently similar material from a similar location. This report shall not be reproduced, except in full, without the written approval of AmeriSci Los Angeles. All analytical Batch data met quality control criteria unless other wise noted.

To the best of my knowledge this report is true and accurate.

Authorized by/Title: _____ Date: 12/23/2020
Minh Phung / Metal Superv

AMERI SCI

CHAIN OF CUSTODY RECORD

AMERISCI LOS ANGELES
24416 South Main St., Suite 308
888.724.5226 Toll Free
310.834.4868 Phone~310.834.4772 Fax
www.ameriscl.com

AMERISCI JOB NO: 42012120 | **PAGE** 1 OF 1

DUE DATE: ☒ 1 DAY ☐ 2 DAY ☐ 3 DAY ☐ 5 DAY ☐ 7 DAY ☐ 10 DAY | **TEMP UPON RECEIPT:**

DATA PACKAGE: | **P.O.#**

COMPANY: BRUNELLE & CLARK CONSULTING, LLC

ADDRESS: P.O. Box 1138, Arcata, CA 95518

PHONE: (707) 822-4058 | **FAX 1:** (707) 630-5033 | **Cell:** (707) 672-5345

CLIENT CONTACT: Zindar Brunelle | **EMAIL:** zbconsult@outlook.com

PROJECT NAME: Garberville Veterans Bldg. 483 Conger St., Garberville, CA | **PROJECT NUMBER:** 2000311 | **PROJECT STATE:** CA

MATRIX: **A**-WATER **S**-SOIL/SOLIDS **SL**-SLUDGE **OIL**-OIL **CH**-CHIPS **WI**-WIPES **C**-CASSETTES **W**-WASTE **O**-OTHER

CONTAINER: **P**-PLASTIC **G**-GLASS **V**-VOA

LAB ID	CLIENT SAMPLE IDENTIFICATION	MATRIX	CONTAINER SIZE	CONTAINER TYPE	CONTAINER #	SAMPLING INFORMATION DATE	SAMPLING INFORMATION TIME	SAMPLING INFORMATION TECH	GRAB (G) OR COMPOSITE (C)	PRESERVATIVES	SAMPLE PH AT LOGIN	TTLC for Lead (1 day TAT)	TCLP for Lead (1 day TAT)					Weight Notes:
2011-LWA	Demolition waste for the Garberville veterans building	W	L	P	1	12/20/20						X	X					193.7g

SAMPLED BY: (PRINT) Zindar Brunelle	DATE: 12/20/20	RECEIVED BY: (PRINT) Rajayne Garner	DATE: 12/22/20
(SIGN)	TIME:	(SIGN)	TIME: 1400
RELINQUISHED BY: (PRINT) Zindar Brunelle	DATE: 12/21/20	RECEIVED BY: (PRINT)	DATE:
(SIGN)	TIME:	(SIGN)	TIME:
RELINQUISHED BY: (PRINT)	DATE:	RECEIVED FOR LABORATORY BY:	DATE:
(SIGN)	TIME:	(SIGN)	TIME:

XRF Paint Analyzer Data Sheet

Garberville Veterans Building

483 Conger St., Garberville, CA

Company	Heuresis Corp.
Model	Pb200i
Type	XRF Lead Paint Analyzer
Serial Num	1566
App Versic	Pb200i-4.1-11

Reading #	Concentration	Units	3 SD	Result	Action Level	NomSecs	Date	Time	User	Mode	Analytic Mode
1	0.9	mg/cm2	0.3	Negative	1	5	12/22/2020	12:53:37	zburnelle	Action Level	Lead Paint
2	1	mg/cm2	0.3	Positive	1	5	12/22/2020	12:55:59	zburnelle	Action Level	Lead Paint
3	0.9	mg/cm2	0.3	Negative	1	5	12/22/2020	12:58:22	zburnelle	Action Level	Lead Paint
4	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:00:55	zburnelle	Action Level	Lead Paint
5	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:02:30	zburnelle	Action Level	Lead Paint
6	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:04:08	zburnelle	Action Level	Lead Paint
7	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:05:45	zburnelle	Action Level	Lead Paint
8	0.2	mg/cm2	0.5	Negative	1	2	12/22/2020	13:07:09	zburnelle	Action Level	Lead Paint
9	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:09:27	zburnelle	Action Level	Lead Paint
10	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:10:48	zburnelle	Action Level	Lead Paint
11	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:12:45	zburnelle	Action Level	Lead Paint
12	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:13:57	zburnelle	Action Level	Lead Paint
13	0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:15:19	zburnelle	Action Level	Lead Paint
14	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:17:38	zburnelle	Action Level	Lead Paint
15	0.2	mg/cm2	0.5	Negative	1	2	12/22/2020	13:18:43	zburnelle	Action Level	Lead Paint
16	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:21:39	zburnelle	Action Level	Lead Paint
17	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:24:30	zburnelle	Action Level	Lead Paint
18	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:26:22	zburnelle	Action Level	Lead Paint
19	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:27:42	zburnelle	Action Level	Lead Paint
20	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:29:26	zburnelle	Action Level	Lead Paint
21	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:31:24	zburnelle	Action Level	Lead Paint
22	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:35:19	zburnelle	Action Level	Lead Paint
23	0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:36:30	zburnelle	Action Level	Lead Paint
24	13.3	mg/cm2	0.5	Positive	1	2	12/22/2020	13:37:39	zburnelle	Action Level	Lead Paint
25	16.6	mg/cm2	0.5	Positive	1	2	12/22/2020	13:38:57	zburnelle	Action Level	Lead Paint

XRF Paint Analyzer Data Sheet

Garberville Veterans Building

483 Conger St., Garberville, CA

26	0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:40:31	zburnelle	Action Level Lead Paint
27	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:43:47	zburnelle	Action Level Lead Paint
28	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:45:35	zburnelle	Action Level Lead Paint
29	0.2	mg/cm2	0.5	Negative	1	2	12/22/2020	13:47:06	zburnelle	Action Level Lead Paint
30	0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:48:38	zburnelle	Action Level Lead Paint
31	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:50:12	zburnelle	Action Level Lead Paint
32	0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:51:20	zburnelle	Action Level Lead Paint
33	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:53:03	zburnelle	Action Level Lead Paint
34	0	mg/cm2	0.5	Negative	1	2	12/22/2020	13:58:18	zburnelle	Action Level Lead Paint
35	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	13:59:53	zburnelle	Action Level Lead Paint
36	-0.1	mg/cm2	0.5	Negative	1	2	12/22/2020	14:01:10	zburnelle	Action Level Lead Paint
37	0.9	mg/cm2	0.3	Negative	1	5	12/22/2020	14:04:07	zburnelle	Action Level Lead Paint
38	1	mg/cm2	0.3	Positive	1	5	12/22/2020	14:06:32	zburnelle	Action Level Lead Paint
39	0.9	mg/cm2	0.3	Negative	1	5	12/22/2020	14:08:56	zburnelle	Action Level Lead Paint

APPENDIX C
NESHAP Notification Form

North Coast Unified
Air Quality Management District
707 L Street, Eureka, CA 95501
Telephone (707) 443-3093 FAX (707) 443-3099
http://www.ncuaqmd.org

COMPLIANCE ADVISORY
ASBESTOS NESHAP APPLICABILITY
TO DEMOLITION AND RENOVATION PROJECTS

In order to reduce the public's potential exposure to airborne asbestos, the Environmental Protection Agency (EPA) established the asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation. The asbestos NESHAP regulates the demolition and renovation of buildings containing asbestos materials including, but not limited to fireproofing and insulating materials, paints, cements, joint compounds, and floor tiles. The regulation applies to commercial structures, industrial structures, and housing units having greater than four dwelling units. Single family dwellings are *generally* exempt. The following is a summary of some of the important NESHAP requirements. Other regulations may apply. For example, CAL/OSHA requires that the asbestos survey be completed by a Certified Asbestos Consultant (CAC) or by a Site Surveillance Technician, under the supervision of a CAC.

Definitions

Demolition – the wrecking or removal of any load supporting structural member of a building. Moving a structure from one location to another and the burning of a structure are also considered demolitions.

Regulated Asbestos Containing Material – (a) friable asbestos material; (b) Category I non-friable material that has become friable; (c) Category I material that has or will be subjected to grinding, sanding, cutting, or abrading; (d) Category II non-friable material that has a high probability of becoming crumbled, pulverized, or reduced to powder by forces expected to act upon the material in the course of demolition or renovation operations.

Renovation – altering a facility or one or more facility components in any way; this includes and is not limited to the stripping or removal or Regulated Asbestos Containing Material (RACM) from a facility component. Also included are projects on the exterior of a structure, such as façade enhancements or remodels.

Prior to beginning any demolition or renovation activity, the structure must be thoroughly surveyed for the presence of asbestos containing material. Survey must be conducted by an AHERA-accredited Building Inspector (40 CFR 763, Subpart E, App. C).

For a renovation - Upon completion of the asbestos survey, determine if the combined amount of RACM to be stripped, removed, dislodged, cut, drilled or similarly disturbed during a renovation is at least 260 linear feet (on pipes), 160 square feet (i.e. flooring, drywall), or 35 cubic feet in volume whichever is least. If the amount of RACM is at least the threshold amounts, District notification prior to the removal is required.

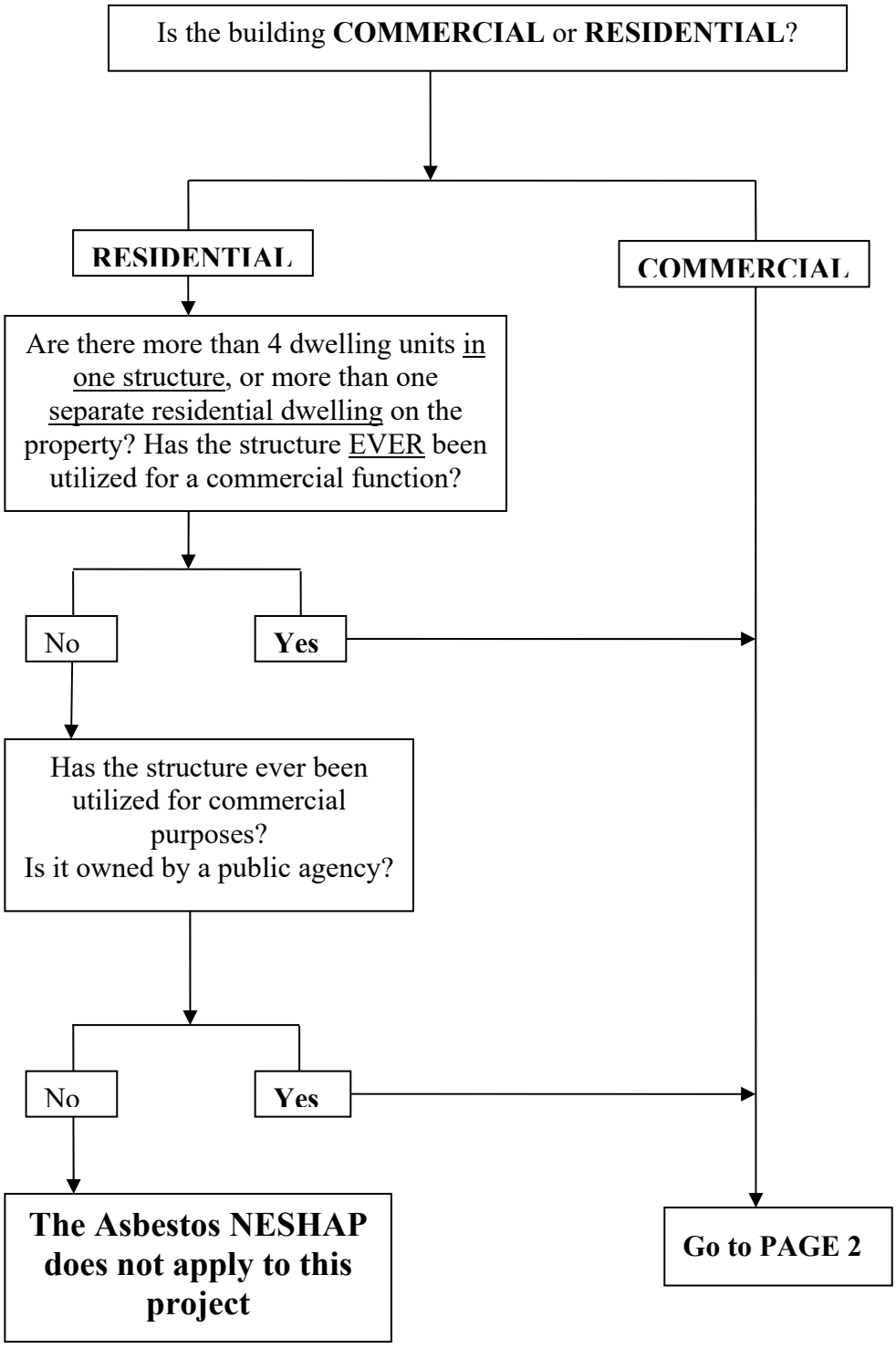
For a demolition - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing material of a quantity greater than or equal to the threshold amounts above will be removed prior to demolition, a separate notification is required.

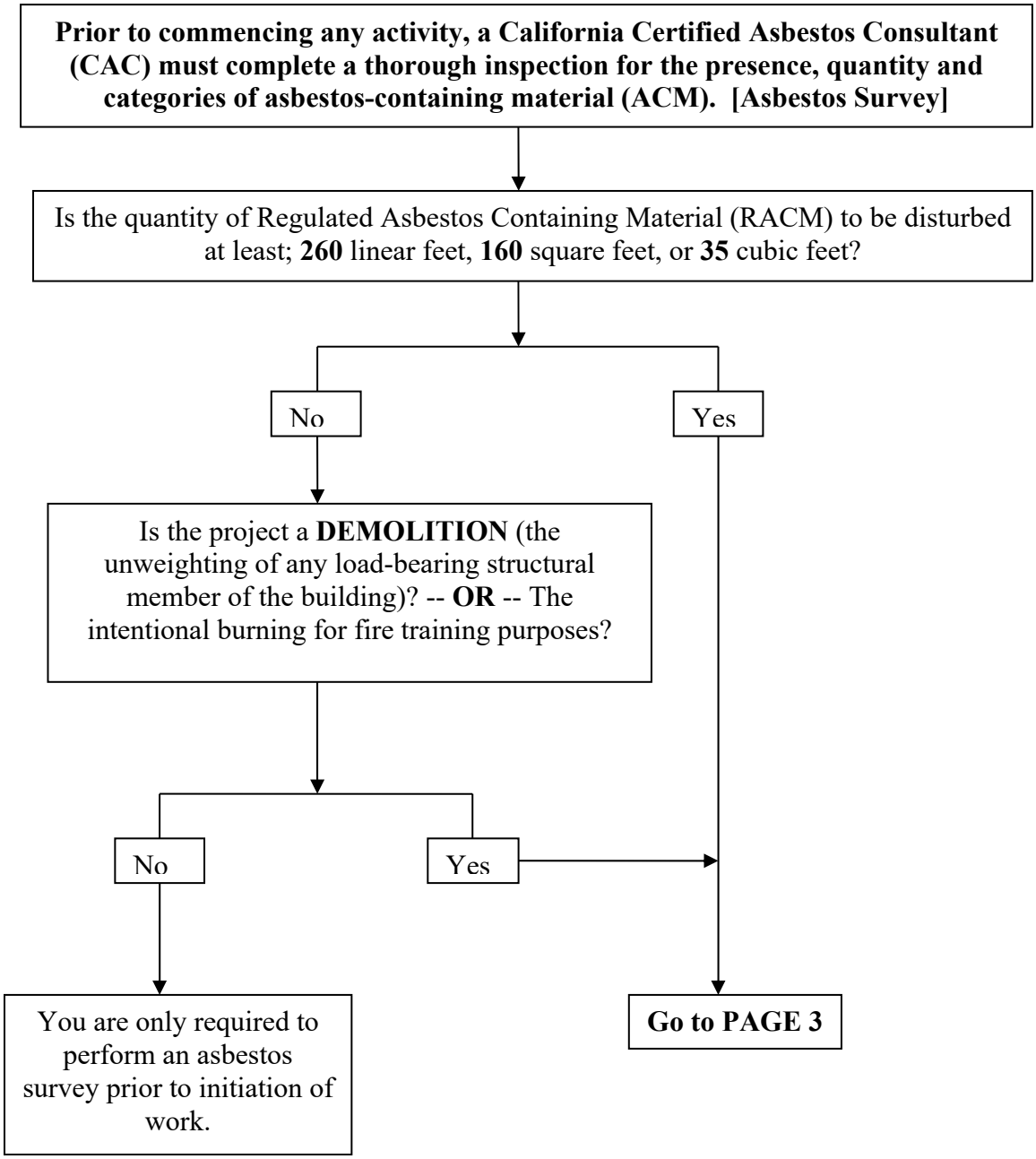
Other Training Requirements – *When removing or disturbing RACM, an AHERA-accredited Contractor/Supervisor must be present and all workers must be AHERA-accredited Workers (40 CFR 763, Subpart E, App. C). All training must be current.*

f Violations of NESHAP regulations can be prosecuted as felony offenses carrying penalties of $37,500 per day per offense.f

For further clarification or additional guidance, contact the NCUAQMD office at (707) 443-3093.

GUIDE TO ASBESTOS NESHAP QUESTIONS




Prior to commencing any activity, a California Certified Asbestos Consultant (CAC) must complete a thorough inspection for the presence, quantity and categories of asbestos-containing material (ACM). [Asbestos Survey]
Is the quantity of Regulated Asbestos Containing Material (RACM) to be disturbed at least; 260 linear feet, 160 square feet, or 35 cubic feet?
No
Yes
Is the project a DEMOLITION (the unweighting of any load-bearing structural member of the building)? -- OR -- The intentional burning for fire training purposes?
No
Yes
You are only required to perform an asbestos survey prior to initiation of work.
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REGULATED RENOVATIONS AND DEMOLITIONS

1) You must submit an Asbestos Survey and completed Notification Form at least 10 working days prior to initiating work on the project.
2) Demolitions:
   a) Requires a 2-**X** notification fee (unless the building is donated to a fire department for training purposes).
   b) (Regulation IV, Rule 401, §1.1.2) An additional 2-**X*** fee is added if Asbestos Abatement is required **for a <u>Demolition</u>** Project.
3) Renovations require only a 2-**X*** notification fee.
4) IF, after notification has been submitted, the quantity of asbestos containing material (ACM) changes by at least 20%, then update the notification.
5) IF, after notification has been submitted, the start date changes to a date <u>after</u> the original start date, then notify by phone as soon as possible AND provide written notice as soon as possible AND no later than original start date.
6) IF, after notification has been submitted, start date changes to a date earlier than the original start date, then provide written notice at least 10 days prior to the new start date.

<u>IN NO EVENT SHALL A PROJECT START ON A DATE OTHER THAN THE DATE CONTAINED IN THE WRITTEN NOTIFICATION.</u>

(40 CFR 61.145 (b) (iv) (C))

***** The **X** value changes annually.
Call to get current value: 707-443-3093

North Coast Unified
Air Quality Management District
707 L Street, Eureka, CA 95501
Telephone (707) 443-3093 FAX (707) 443-3099
http://www.ncuaqmd.org

ASBESTOS DEMOLITION AND RENOVATION NOTIFICATION FORM
GENERAL INFORMATION

The Asbestos NESHAP, 40 CFR Part 61, Subpart M, requires written notification of demolition or renovation operations under Section 61.145. This form may be used to fulfill this requirement. Only complete notification forms are acceptable. Incomplete notification may result in enforcement action.

This notification should be typewritten and postmarked or delivered no later than ten days prior to the beginning of the asbestos removal activity (dates specified in Section VIII) or demolition (dates specified in Section IX). Please submit the form, along with the appropriate fee, to: **NORTH COAST UNIFIED AQMD**
707 L STREET, EUREKA, CA 95501

INSTRUCTIONS:

I. Type of Notification: Enter "O" if the notification is a first time or original notification, "R" if the notification is a revision of a prior notification, or "C" if the activity has been cancelled.

II. Facility Information: Enter the names, addresses, contact persons and telephone numbers of the following:
Owner: Legal owner of the site at which asbestos is being removed or demolition planned
Asbestos Removal Contractor: Certified asbestos contractor hired to remove asbestos (include DOSH registration #)
Other Demolition or Renovation Operator: Demolition contractor, general contractor, or other person who leases, operates, controls, or supervises the site (fire dept if training burn).

III. Type of Operation: Enter "D" for facility demolition, "R" for facility renovation, "O" for ordered demolition, or "E" for emergency renovation. Fire training burns are considered facility demolitions ("D").

IV. Is Asbestos Present?: Answer "yes" or "no" regardless of the amount of asbestos present.

V. Facility Description: Provide detailed information on the areas being renovated or demolished. If applicable, provide the floor numbers and room numbers where renovations are to be conducted.
Site Location: Provide information needed to locate site in event that the address alone is inadequate.
Building Size: Provide in square meters or square feet.
No. of Floors: Enter the number of floors including basement or ground floors.
Age in Years: Enter approximate age of the facility.
Present Use / Prior Use: Describe the primary use of the facility or enter the following codes: H - hospital; S - school; P - public building; O - office; I - industrial; U - university or college; B - ship; C - commercial; or R - residential.

VI. Asbestos Detection Procedure: Describe methods and procedures used to determine whether asbestos is present at the site, including a description of the analytical methods employed. **Building inspections must be performed by an AHERA-accredited Building Inspector** (40 CFR 763, Subpart E, App. C). Include copy of current accreditation. If an inspection report has been prepared by a consultant for the facility please include a copy with the notification.

VII. Approximate Amount of Asbestos, Including: (1) Regulated asbestos containing material (RACM) to be removed (including nonfriable ACM to be sanded, ground, or abraded); (2) Category I ACM not removed ; and (3) Category II ACM not removed. For both removals and demolition, enter the amount of RACM to be removed by entering a number in the appropriate box and an "X" for the unit. For demolition only, enter the amount of Category I and II nonfriable asbestos not to be removed in the appropriate boxes. Category I nonfriable material includes packing, gasket, resilient floor covering, and asphalt roofing materials containing more than one percent asbestos. Category II nonfriable material includes any material, excluding Category I products, containing more than one percent asbestos, that when dry, cannot be crumbled, pulverized, or reduced to powder. Facilities to be used for fire training purposes must have all materials containing more than one percent asbestos removed.

VIII. Scheduled Dates of Asbestos Removal: Enter scheduled dates (month/day/year) for asbestos removal work. Asbestos removal work includes any activity, including site preparation, which may break up, dislodge, or disturb asbestos material. **These dates must be accurate.** Asbestos removal work occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

IX. Scheduled Dates of Demo/Renovation: Enter scheduled dates (month/day/year) for beginning and ending of the planned demolition or renovation. For fire training burns this is the time period when the actual fire training burn will take place. **These dates must be accurate.** Demolition or renovation activity occurring prior to the start date or after the end date is a violation and could result in substantial enforcement action. If these dates change, notify the District immediately, by submitting a revision request form.

X. Description of Planned Demolition or Renovation Work, and Method(s) to be Used: Include here a description of the overall work being done and the techniques being used. A work plan can be attached to address this item.

XI. Description of Engineering Controls and Work Practices to be Used to Control Emissions of Asbestos at the Demolition or Renovation Site: Describe the work practices and engineering controls selected to ensure compliance with the requirements of the regulation, including removal and waste handling emission control procedures. A work plan can be attached to address this item.

XII. Waste Transporter(s): Enter the name, addresses, contact persons and telephone numbers of the persons or companies responsible for transporting ACM from the removal site to the waste disposal site. If the removal contractor or owner is the waste transporter, state "same as owner" or "same as removal contractor".

XIII. Waste Disposal Site: Identify the waste disposal site, including the complete name, location, and telephone number of the facility. If ACM is to be disposed of at more than one site, provide complete information on an additional sheet submitted with the form.

XIV. If Demolition Ordered by a Government Agency: Provide the name of the responsible official, title and agency, authority under which the order was issued, the dates of the order and the dates of the ordered demolition. Include a copy of the order with the notification.

XV. Emergency Renovation Information: Provide the date and time of the emergency, a description of the event and a description of unsafe conditions, equipment damage or financial burden resulting from the event. The information should be detailed enough to evaluate whether a renovation falls within the emergency exception.

XVI. Description of Procedures to be Followed in the Event that Unexpected Asbestos is Found or Previously Nonfriable Asbestos Material Becomes Crumbled, Pulverized, or Reduced to Powder: Provide adequate information to demonstrate that appropriate actions have been considered and can be implemented to control asbestos emissions adequately, including at a minimum, conformance with applicable work practice standards. Typically these will include a work stoppage, wetting of material, and notification to the District.

XVII. Certification of Presence of Trained Supervisor: Certify that a person trained in asbestos removal procedures and the provisions of this regulation will be on-site and supervise the demolition or renovation. **When handling RACM, the supervisor must be a current AHERA-accredited contractor/supervisor, and the workers must be AHERA-accredited workers** (40 CFR 763 Subpart E App. C). The supervisor is responsible for the activity on-site. Evidence that the training has been completed by the supervisor must be available for inspection during normal business hours.

XVIII. Verification: Please certify the accuracy and completeness of the information provided by signing and dating the notification form.

FEES AND OTHER REQUIREMENTS:

Demolition - **OR** - Renovation Notifications …….. **2 X** (Regulation IV, Rule 401(B))
Asbestos Abatement (**with** Demolition Projects) ……..…….. **4 X** (Regulation IV, Rule 401(B))

- All fees must accompany the notification form.
- Notification forms must be mailed or hand delivered to the District office; faxes are acceptable, if followed by the original within three (3) days.
- Notifications must be received or post-marked at least 10 business days prior to the start of demolition or renovation.
- Incomplete forms will be returned for correction. The 10 day clock does not start until a correctly completed notification is received by the District office.
- If a person cancels a notification, they may request a fee refund provided:
    1. the fee has been paid,
    2. the District has not performed an inspection,
    3. the request is in writing,
    4. and the request is made within ten days following cancellation.
- When a Fire Department receives a fee or donation from the property owner of a structure that is to be used for fire training purposes, the notification/inspection fee noted above shall be paid. Coordinated Burn Authorization Permits are required for Fire Department training burns; however they are exempt from the permit fees (Regulation II, Rule 408(C)(4)).
- **Rule 401 (B) -** Where a demolition project includes the removal of Regulated Asbestos Containing Material from a facility prior to the wrecking of the structure, the *removal is treated as a separate renovation project for the purposes of fees*, although they may be included in a single notification. This requires a **second 2 X fee**.
- Any demolition or renovation project that requires physical barriers for the purpose of controlling asbestos emissions (containment) shall install transparent viewing ports which allow observation, to the extent possible, of all stripping and removal of regulated asbestos containing material from outside the containment area.

Questions on completing the asbestos demolition / notification form, or on the NESHAP regulations covering asbestos, can be directed to District staff at (707) 443-3093.

NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

NOTIFICATION OF DEMOLITION OR RENOVATION SUBJECT TO ABESTOS NESHAP's (40 CFR PART 61.145)

***IMPORTANT*: Notifications must be signed in ink. All numbered items must be addressed, regardless of applicability – e.g., enter N/A where numbered items don't apply to your project. Only originals accepted.**

Operator Project #	Postmark	Date Received	Notification #

I. TYPE OF NOTIFICATION Circle One: **O** = Original **R** = Revised **C** = Canceled

II. FACILITY INFORMATION (*Identify owner, removal contractor and any other contractors*)

OWNER NAME:		
Address:		
City:	State:	Zip:
Contact:	Tel:	
ASBESTOS REMOVAL CONTRACTOR:		DOSH Reg #
Address:		
City:	State:	Zip:
Contact:	Tel:	
OTHER DEMOLITION OR RENOVATION OPERATOR:		
Address:		
City:	State:	Zip:
Contact:	Tel:	

III. TYPE OF OPERATION Circle One: **D** = Demolition **O** = Ordered Demolition **R** = Renovation **E** = Emergency Renov.

IV. IS ASBESTOS PRESENT Circle One: (**Y**es **N**o)

V. FACILITY DESCRIPTION (*Include building name, number and floor or room numbers*)

Bldg. Name:			
Address:			
City:	State:	Zip:	County:
Site Location:			
Building Size:	# of Floors:	Age in Years:	
Present Use:	Prior Use:		

VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}

C.A.C. Certification #	**Certification Experation Date:**

VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING: 1. Regulated ACM to be Removed 2. Category I ACM to be Removed 3. Category II ACM to be Removed	RACM To Be Removed		Nonfriable Asbestos Material To Be Removed		Indicate Unit of Measurement Below	
			Category I	Category II	Units	
Pipes					Ln Ft:	Ln m:
Surface Area					Sq Ft:	Sq m:
Vol. RACM Off Facility Component					Cu Ft:	Cu m:

VIII. SCHEDULED DATES ASBESTOS REMOVAL (*MM/DD/YY*)	**Start:**	**Complete**

IX. SCHEDULED DATES DEMO/RENOVATION (*MM/DD/YY*)	**Start:**	**Complete**

X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:

District Use Only	**Date Payment Received:**	**Payment Method:**	**Check Number:**	**Amount:**

XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT TH DEMOLITION OR RENOVATION SITE (*attach work plan, if appropriate*):

XII. WASTE TRANSPORTER #1

Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	

WASTE TRANSPORTER #2

Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	

XIII. WASTE DISPOSAL SITE

Name:	Tel:	
Address:		
City:	State:	Zip:

XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY PLEASE IDENTIFY THE AGENCY BELOW (*attach copy of demolition order*):

Name:	Title
Authority	
Date of Order (*MM/DD/YY*):	Date Ordered to Begin (mm/dd/yy):

XV. FOR EMERGENCY RENOVATIONS

Date and Hour of Emergency (*mm/dd/yy*):

Description of the Sudden, Unexpected Event:

Explanation of how the event caused unsafe conditions or would cause equipment damage or an unreasonable financial burden:

XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR PREVIOUSL NONFRIABLE ASBESTOS MATERIAL BECOMES FRIABLE:

XVII. I CERTIFY THAT AN INDIVIDUAL TRAINED IN THE PROVISIONS OF THIS REGULATION (40 CFR PART 61, SUBPART M) WILL BE ON-SITE DURING ALL ASBESTOS ABATEMENT, AND EVIDENCE THAT THE REQUIRED CERTIFICATION ACCOMPLISHED BY THIS PERSON WILL BE AVAILABLE FOR INSPECTION BY REGULATING AUTHORITIES DURING NORMAL BUSINESS HOURS.

(Print Name of Owner/Operator) (Signature of Owner/Operator)

XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.

(Print Name of Owner/Operator) (Signature of Owner/Operator)

Any owner or operator of a demolition or renovation project which is subject to 40 CFR-61, Subpart M (NESHAPS) for asbestos and is required to submit a written notification of the demolition/renovation to the District shall submit with the notification form the following fee:

SINGLE DEMOLITION – OR – RENOVATION PROJECTS . . . . . 2 X

ASBESTOS ABATEMENT accompanying a demolition (Regulation IV, Rule 401, §1.1.2) . . . . . 4 X

Fire Department training burns shall be exempted from the fees noted above.

APPENDIX D
Consultant Certifications

State of California
Division of Occupational Safety and Health
Certified Asbestos Consultant

Zindar Brunelle
Name

Certification No. **14-5295**

Expires on **10/15/21**

This certification was issued by the Division of Occupational Safety and Health as authorized by Sections 7180 et seq. of the Business and Professions Code.

California Department of PublicHealth

STATE OF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH

LEAD-RELATED CONSTRUCTION CERTIFICATE

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
	Lead Inspector/Assessor	LRC-00000482	9/2/2021
	Lead Supervisor	LRC-00000481	9/2/2021

Zindar Brunelle

Disclaimer: This document alone should not be relied upon to confirm certification status. Compare the individual's photo and name to another valid form of government issued photo identification. Verify the individual's certification status by searching for Lead-Related Construction Professionals at www.cdph.ca.gov/programs/clppb or calling (800) 597-LEAD.

CALINC TRAINING LLC

This is to certify that

Zindar Brunelle

has successfully completed an A.H.E.R.A course approved by the Department of Industrial Relations Division of Occupational Safety and Health of the State of California entitled

Asbestos Building Inspector Refresher

as required under Toxic Substances Control Act Title II

1/21/2020		161512
Class Date(s)		Certificate Number
David Esparza - President	CA-001-06 Cal/OSHA Number	1/21/2021 Expiration Date

2040 Peabody Road Vacaville, CA 95687 Phone (800) 359-4467 Fax (707) 446-9072