

*Brunelle & Clark Consulting, LLC*

**ASBESTOS SURVEY  
& LEAD PAINT SAMPLING  
CLARK COMPLEX  
ACCESSIBILITY MODIFICATIONS  
3015 H STREET,  
EUREKA, CA**



October 22, 2022

Project # 2200204

Prepared for:  
County of Humboldt  
County Administrative Office  
ADA Compliance Team  
Attn: Mr. Travis I. Smith  
825 5th Street, Rm. 112  
Eureka, CA 95501  
(707) 476-2388

Prepared by:  
Brunelle & Clark Consulting, LLC  
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(707) 672-5345

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## **1.0 PURPOSE**

On October 1, 2022, this office conducted an asbestos survey, and paint sampling for lead, for the, Clark Complex Accessibility Modifications Project, located at 3015 “H” Street, in Eureka, 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.

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**

This report combines the findings of the current survey, with three (3) surveys of the project areas which were previously provided by this office. The previous survey reports are listed below.

- “*Asbestos Survey & Paint Sampling, Telecom Upgrade Project, Humboldt County, Clark Complex, N-W Wing, 3015 H Street, Eureka, CA,*” B&CC project #1600301, dated March 9, 2016.
- “*Second Additional Asbestos Survey, Telecom Upgrade Project, Humboldt County, Clark Complex, N-W Wing, 3015 H Street, Eureka, CA,*” B&CC project #1600312, dated July 8, 2016.

- *“Limited Asbestos Survey For Flooring Replacement, Room 130 & Adjacent Hall, Clark Complex, 3015 H Street, Eureka, CA,” B&CC project #1900309, dated January 6, 2020.*

The current survey includes representative asbestos and lead sampling of materials to be impacted by the current Accessibility Project, excluding materials sampled in the above referenced previous surveys. The survey areas are shown on Figure 1, Appendix A, and are listed below.

- Restroom 4 (all ceiling, wall & floor finish)
- Hall Restrooms (all ceiling, wall & floor finish)
- Hall Area outside the hall restrooms (wall & floor finish)
- Exterior, Front Entrance (stair landing & siding)

The survey does not include any other materials or areas not listed above as included in the survey.

### **Asbestos Survey**

During the current asbestos survey, 43 bulk samples were collected from suspect materials, and submitted for laboratory analysis of asbestos content.

**One (1) type of material was found to contain asbestos during the current survey.**

**One (1) other type of material within the project area was found to contain asbestos in a previous survey (B&CC project #1600301).**

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

### **Lead Paint Sampling**

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 33 components within the project area.

Lead Based Paint (LBP) was identified on one building component. All other sampled components were found to contain low to trace, or negative lead content.

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.

## **3.0 ASBESTOS SURVEY**

During the current survey, a total of forty-three (43) 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 2-4, 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. 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.

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 two (2) types of building materials, one from the current survey, and one from a previous survey. The asbestos containing materials identified in the project area are listed by category below.

Both materials are categorized as NESHAP Regulated ACM (RACM), and are listed below.

#### **RACM**

- **Sheet flooring**, red mosaic pattern
- **Sheet flooring**, brown mosaic pattern

The project ACM and/or 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 8 & 9, Appendix A.

**TABLE 2**  
**ASBESTOS IDENTIFICATIONS & CLASSIFICATIONS**

“ADA Modifications”  
Clark Complex  
3015 “H” St., Eureka, CA

MATERIAL	LOCATION	QUANTITY	ASBESTOS CONTENT & TYPE	OSHA CLASSIFICATION	NESHAP CATEGORY	WASTE DISPOSAL CLASSIFICATION
<b>Current Survey</b>						
<b>Sheet flooring, red mosaic &amp; tan glue</b>  <b>Note:</b> the underlying particle board is contaminated	<b>Hall Restrooms,</b> top flooring layer in the W.RR & M.RR (See Fig. 9)	Approx. 225 SF	15% CH	ACM, Class II abatement required where disturbed	“Friable”  RACM	“Friable” asbestos waste
<b>Previous Survey (Project #1600301)</b>						
<b>Sheet flooring, brown mosaic</b>  <b>Note:</b> underlying plywood substrate is contaminated	<b>Restroom 4,</b> top flooring layer (See Fig. 8)	Approx. 30 SF	15% CH	ACM, Class II abatement required where disturbed	“Friable”  RACM	“Friable” asbestos waste

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

**ACM** = Asbestos Containing Materials, containing >1% asbestos

**CH** = Chrysotile Asbestos

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

**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 was identified in two materials within the project area. All asbestos containing material must be abated prior to renovation or demolition activities that would disturb the asbestos containing materials.

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

All abatement of asbestos containing material must be done by a registered asbestos abatement contractor, using trained and certified personnel, and conducted 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.

In Humboldt, Del Norte, and Trinity counties, the NESHAP regulations concerning renovation and/or demolition work is enforced by the North Coast Unified Air Quality Management District (NCUAQMD) located in Eureka, California. When NESHAP Notifications are required, they must be submitted to the NCUAQMD, at least 10 days prior to conducting asbestos abatement and/or demolition work. A copy of the *NESHAP Notification Form* is contained in Appendix C, of this report. Contact the NCUAQMD (707-443-3093) if any questions arise.

Friable NESHAP Regulated Asbestos Containing Materials (RACM) were identified during this survey. **A NESHAP Notification for “abatement” must be filed at least 10 days prior to abatement of the regulated asbestos containing materials.**

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, a NESHAP Notification for “demolition” will need to be filed at least 10 days prior to such work.**



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.

**A temporary worksite notification to the Division of Occupational Safety and Health, must be submitted a minimum of 24-hours prior to asbestos abatement activities.**

The Department of Toxic Substance Control (DTSC) defines “friable” asbestos waste as “hazardous” waste. **A temporary hazardous waste generator number from the EPA will need to be obtained for this site if hazardous waste is to be generated at this site.** See the DTSC section below for information on obtaining a temporary hazardous waste generator number. Shipping of hazardous friable asbestos waste will require the use of a licensed “hazardous” waste hauler.

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.

**RACM Sheet Flooring:** Any abatement or disturbance of the asbestos containing sheet flooring identified in this report must be done by a licensed asbestos abatement contractor using Class II asbestos abatement methods at a minimum. It is recommended herein to augment the standard Class II abatement with negative air containment of the abatement area. 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.

## **5.0 PAINT SAMPLING/LEAD ANALYSIS**

The paint sampling for lead includes representative sampling of the building components within the project area.

### **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) building components within the project area.

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 Figures 5-7, 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<sup>2</sup>.
- **Lead Containing Surface Coatings (LCSC)** are paints with lead content that include 0.1 mg/cm<sup>2</sup> and range up to but not including 1.0 mg/cm<sup>2</sup>.
- **Undetectable for Lead** are results of less than 0.1 mg/cm<sup>2</sup> lead content, and are deemed to be essentially “lead free.”

By XRF analyses: Lead Based Paint (LBP) was identified on one sampled building component, fifteen (15) building components were found to contain low to trace lead content, and seventeen (17) were found to be “negative” for detectable lead. See Table 3, Appendix B for all sampling data.

## **6.0 CONCLUSIONS & REGULATORY REQUIREMENTS FOR LEAD**

### **Lead In Paint**

The XRF paint sampling identified **Lead Based Paint on one cast iron sink in the Women’s Restroom**. All other sampled components were found to contain low to trace, or negative lead content.

All lead related construction work requires compliance with the Cal/OSHA Lead Construction Standard, Title 8 CCR 1532.1, for worker protection; the California Code of Regulations Title 17, CCR 35000-36100; and when applicable, the EPA Lead Renovation, Repair, and Painting Rule, 40 CFR Part 745.

Any contractor conducting lead related construction work, including demolition of building components with paint containing lead, should be familiar with the applicable lead regulations, conduct the work following the applicable regulatory requirements, and when required, be certified to conduct lead related activities.

All personnel conducting lead related construction work, should be properly trained, and when required, be certified to conduct lead related activities.

Cal/OSHA requires exposure assessment personal air sampling to be conducted when LBP and/or LCSC is disturbed by Cal/OSHA defined “trigger tasks,” or any lead related construction work that may result in lead exposure to workers. Pending exposure assessment, the contractor must provide interim protective measures, including but not limited to, proper respirators, protective clothing, and training.

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.

## 7.0 ASBESTOS 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.

## **8.0 LEAD REGULATIONS**

The following regulations are some of the more pertinent Federal and California 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.

**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.

**U.S. Department of Housing and Urban Development (HUD):** the HUD Lead Safe Housing Rule, 24 CFR 35, subparts B through R applies to pre-1978 housing that is federally owned, or receiving federal assistance.

**HUD “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.

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.

## **9.0 DISCLAIMER**

The sole purpose of this investigation and of this report is to assess the site with respect to asbestos materials and/or 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.

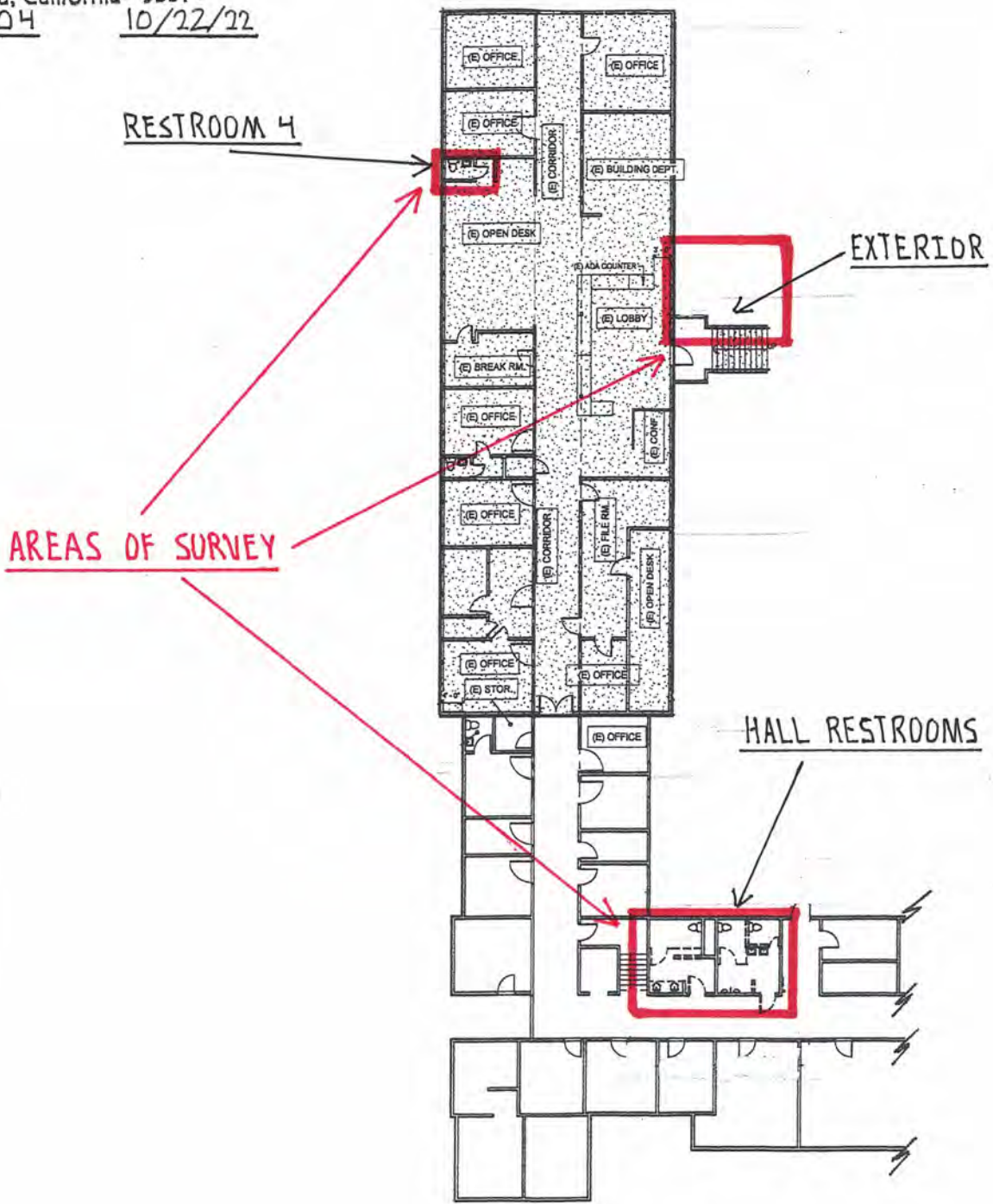
While the owner/operator was responsible for describing the extent and limits of site work, materials to be sampled were determined by the certified (asbestos) building inspector who performed this survey and was not otherwise subject to limitations by the owner/operator.

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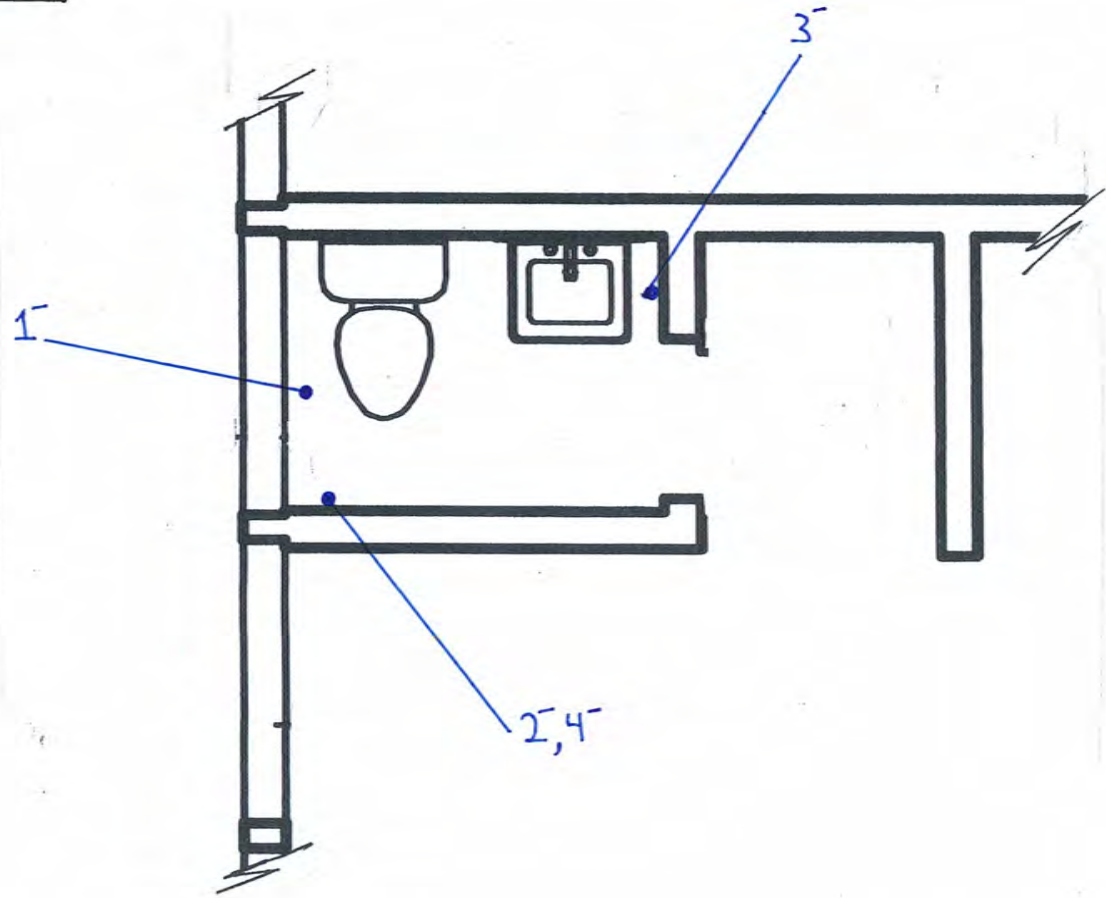


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**APPENDIX A**  
**Figures**



**Area of Survey  
ADA Modifications  
Clark Complex  
3015 "H" Street  
Eureka, CA**



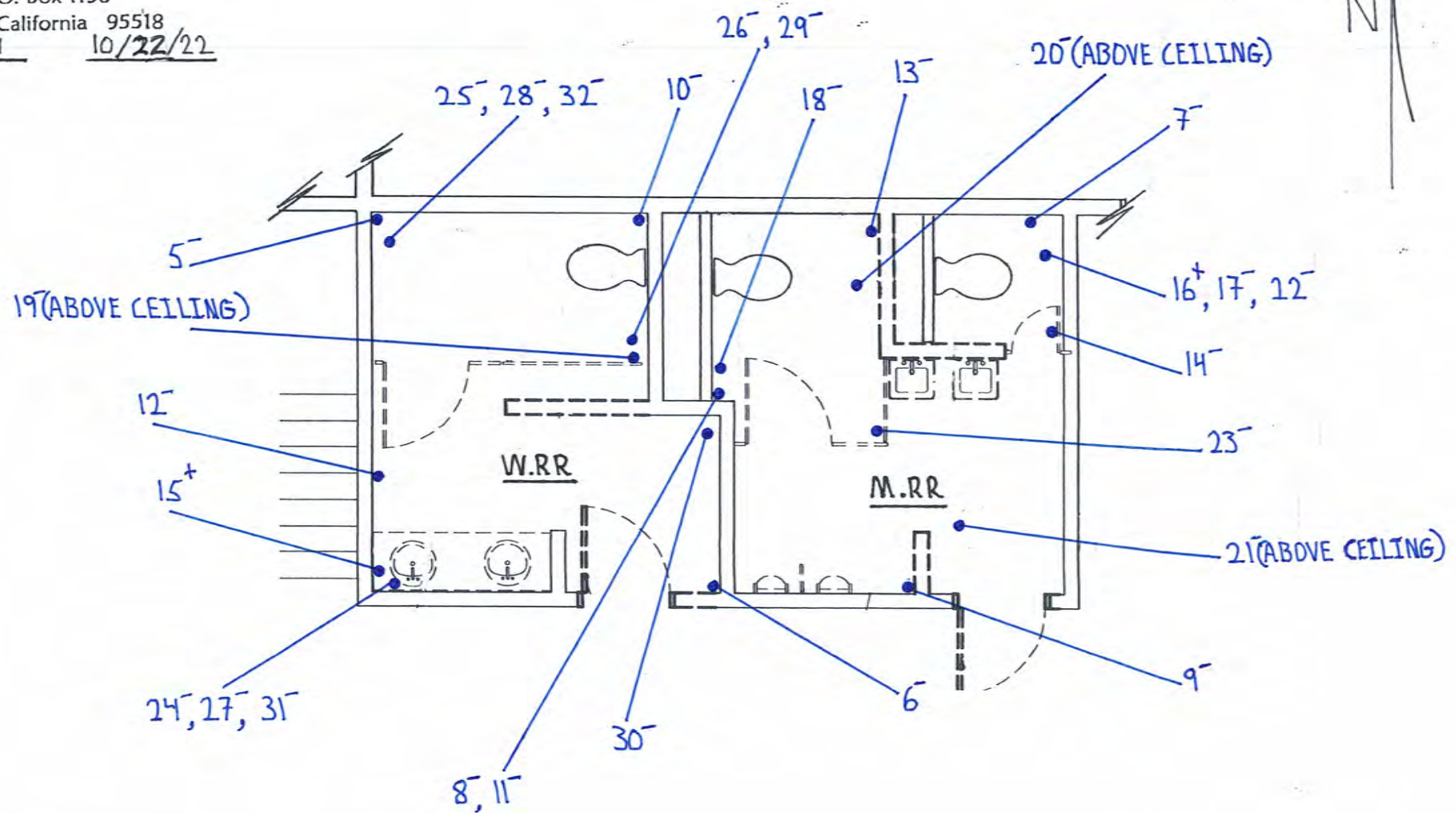
**ASBESTOS SAMPLE LOCATIONS**

(Asbestos Samples: 1-4)

- # Asbestos Sample Locations  
(Prefixed 22204 #, with + or - designation)  
(+) is positive for Asbestos, (-) is negative

**Restroom 4**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 2



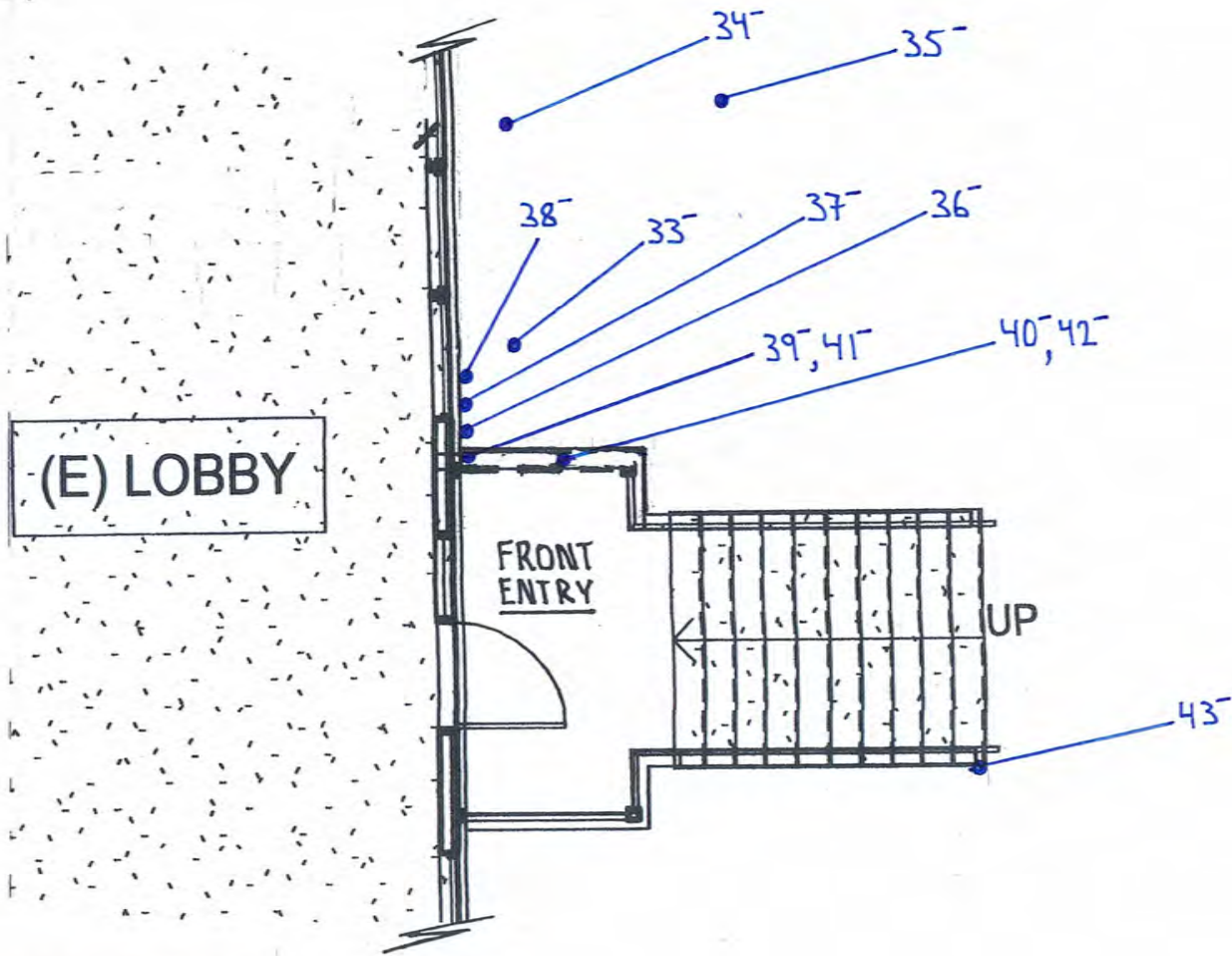
**ASBESTOS SAMPLE LOCATIONS**

(Asbestos Samples: 5-32)

- # Asbestos Sample Locations  
 (Prefixed 22204 #, with + or - designation)  
 (+) is positive for Asbestos, (-) is negative

**Hall Restrooms**  
 Clark Complex  
 3015 "H" Street  
 Eureka, CA

FIG. 3



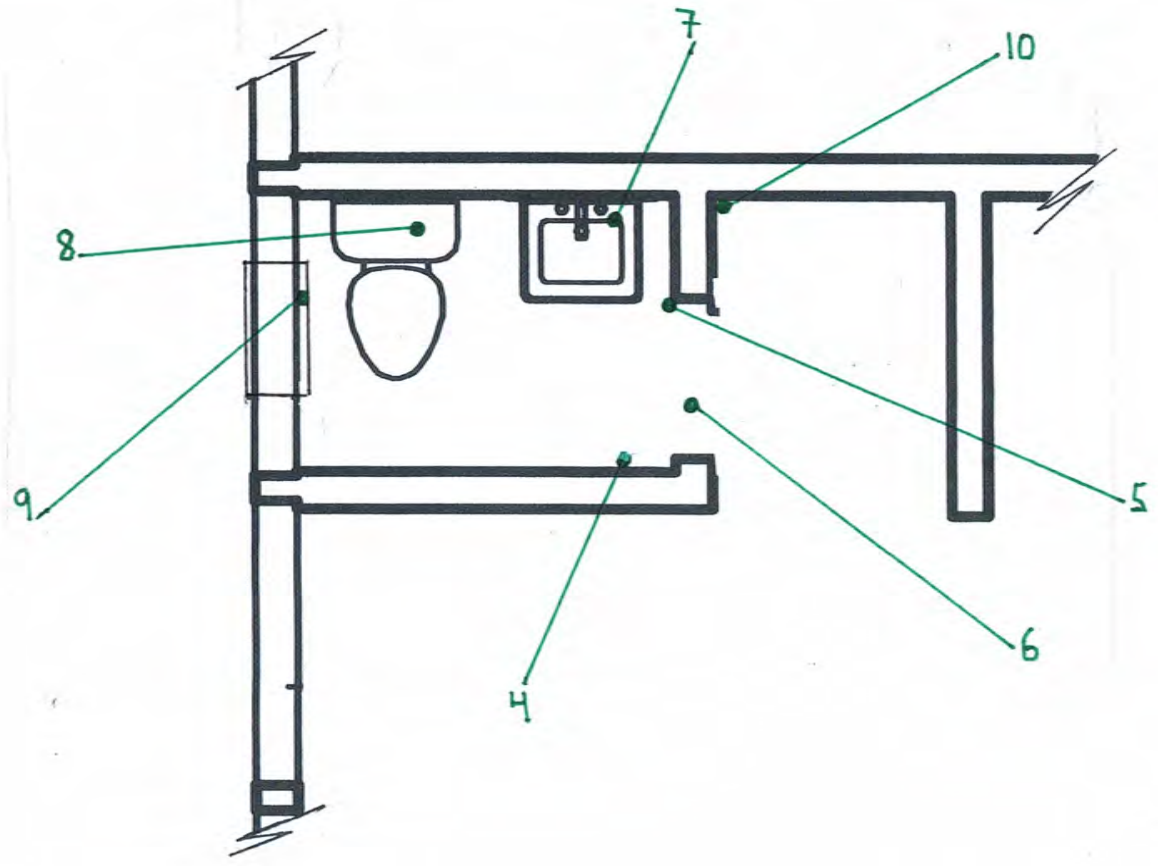
**ASBESTOS SAMPLE LOCATIONS**

(Asbestos Samples: 33-43)

- # Asbestos Sample Locations  
(Prefixed 22204 #, with + or - designation)
- (+) is positive for Asbestos, (-) is negative

**Exterior**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 4



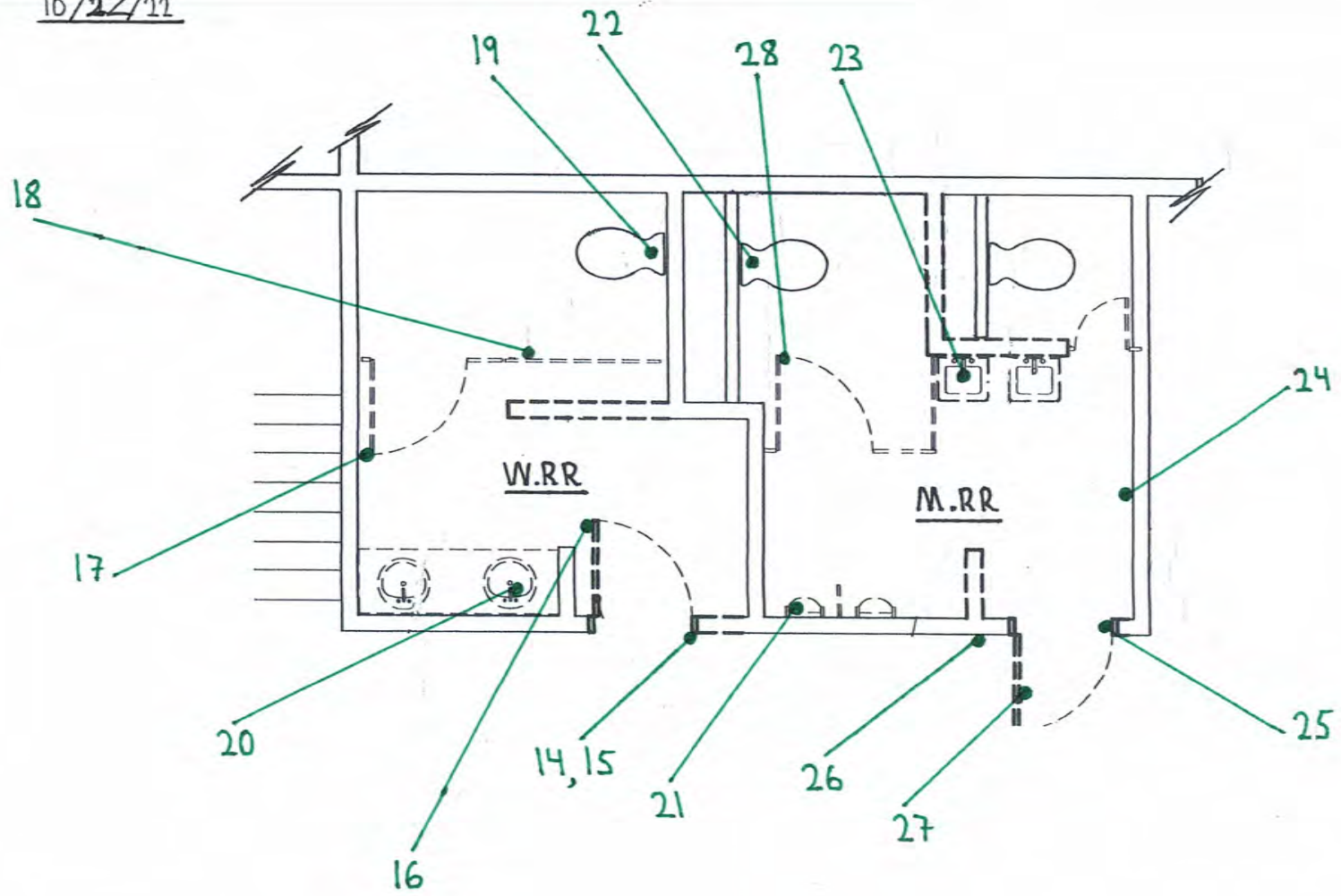
**XRF SAMPLE LOCATIONS**

(Samples: 4-10)

● # XRF Sample Location

**Restroom 4**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 5



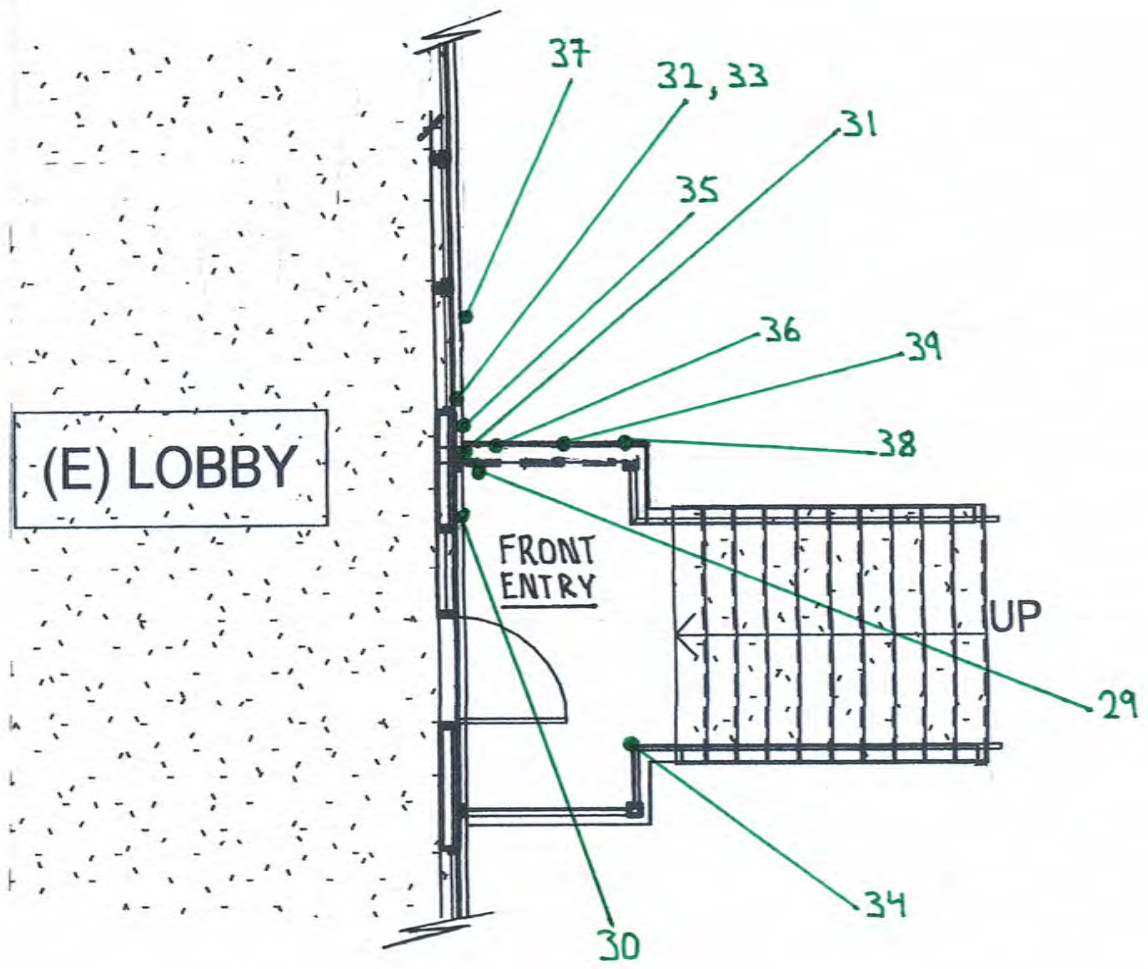
**XRF SAMPLE LOCATIONS**

(Samples: 14-28)

● # XRF Sample Location

**Hall Restrooms**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 6



**XRF SAMPLE LOCATIONS**

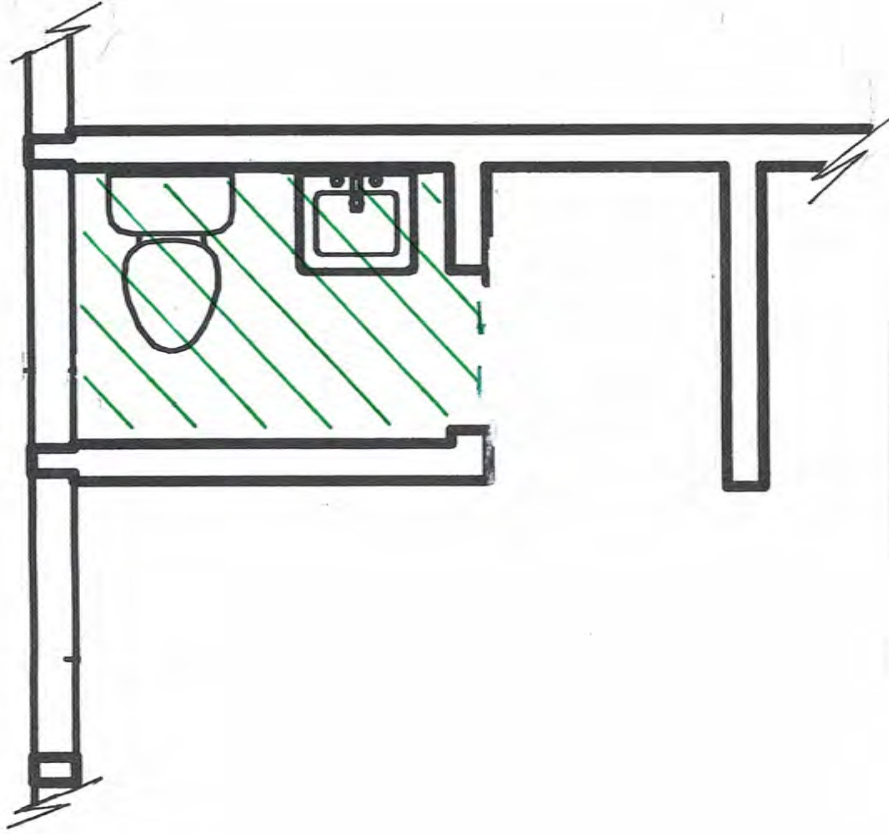
(Samples: 29-39)

● # XRF Sample Location


**Exterior**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 7





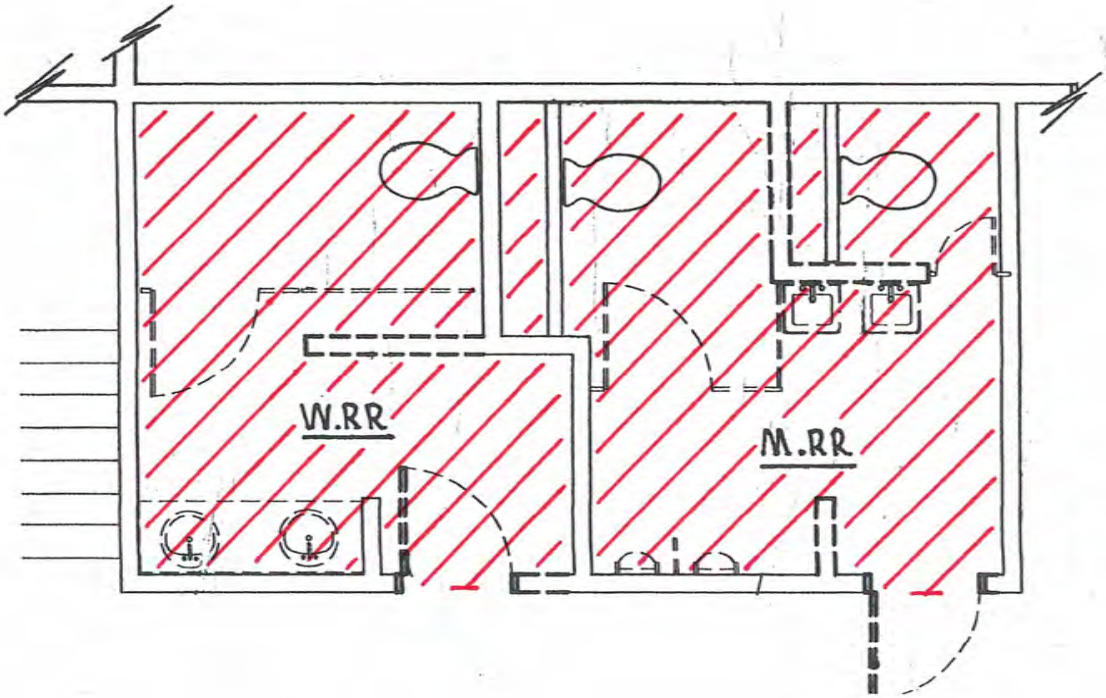
**ASBESTOS LOCATIONS**

-  RACM Sheet flooring, brown mosaic (top flooring layer)


**Note: see Table 2 for material & location details**

**Restroom 4**  
Clark Complex  
3015 "H" Street  
Eureka, CA

**FIG. 8**



**ASBESTOS LOCATIONS**

 RACM Sheet flooring, red mosaic  
(top flooring layer)

Note: see Table 2 for material & location details

**Hall Restrooms**  
Clark Complex  
3015 "H" Street  
Eureka, CA

FIG. 9

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**APPENDIX B**  
**Tables & Laboratory Reports**

**TABLE 1**  
**SUMMARY OF ASBESTOS ANALYTIC DATA**

**“ADA Modifications”**  
**Clark Complex**  
**3015 “H” Street**  
**Eureka, CA**

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
22204-1	Plaster; topcoat, white	RR4, ceiling	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, Lt. gray	“	NAD	NF	
22204-2	Plaster; topcoat, white	RR4, wall	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, Lt. gray	“	NAD	NF	
22204-3	Plaster; topcoat, white	RR4, wall	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, Lt. gray	“	NAD	NF	
22204-4	Button board, gypsum	RR4, wall	NAD	NF	
22204-5	Joint compound	W.RR, ceiling	NAD	NF	
2 <sup>nd</sup> layer	Gypsum board	“	NAD	NF	
22204-6	Joint compound	W.RR, wall	NAD	NF	
2 <sup>nd</sup> layer	Gypsum board	“	NAD	NF	
22204-7	Joint compound	M.RR, ceiling	NAD	NF	
2 <sup>nd</sup> layer	Gypsum board	“	NAD	NF	
22204-8	Joint compound	M.RR, wall	NAD	NF	
2 <sup>nd</sup> layer	Gypsum board	“	NAD	NF	
22204-9	Joint compound	M.RR, wall	NAD	NF	
2 <sup>nd</sup> layer	Gypsum board	“	NAD	NF	

**TABLE 1  
SUMMARY OF ASBESTOS ANALYTIC DATA**

**“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA**

<b>Sample Number</b>	<b>Sample Description (each layer)</b>	<b>Location</b>	<b>Asbestos % and Type</b>	<b>Friable vs. Non-Friable</b>	<b>Comments</b>
22204-10	Panel glue, yellow	W.RR, wall panel	NAD	NF	
22204-11	Panel glue, yellow	M.RR, wall panel	NAD	NF	
22204-12	Baseboard mastic, dark brown	W.RR, vinyl baseboard	NAD	NF	
22204-13	Baseboard mastic, dark brown	M.RR, vinyl baseboard	NAD	NF	
22204-14	Baseboard mastic, dark brown	M.RR, vinyl baseboard	NAD	NF	
<b>22204-15</b>	<b>Sheet flooring, red mosaic</b>	<b>W.RR, floor, top layer</b>	<b>15% CH</b>	<b>F</b>	<b>Friable due to paper backing</b>
<b>2<sup>nd</sup> layer</b>	<b>Glue, tan</b>	<b>“</b>	<b>2% CH</b>	<b>NF</b>	
<b>22204-16</b>	<b>Sheet flooring, red mosaic</b>	<b>M.RR, floor, top layer</b>	<b>PACM</b>	<b>F</b>	<b>NA/PS</b>
<b>2<sup>nd</sup> layer</b>	<b>Glue, tan</b>	<b>“</b>	<b>PACM</b>	<b>NF</b>	<b>NA/PS</b>
22204-17	Tarpaper, black	M.RR, floor, under particle board	NAD	NF	
22204-18	Tarpaper, black	M.RR, floor, under particle board	NAD	NF	
22204-19	Plaster patch, Lt. gray	Hall Restrooms, above ceiling, on original plaster ceiling	NAD	NF	
22204-20	Plaster patch, Lt. gray	Hall Restrooms, above ceiling, on original plaster ceiling	NAD	NF	

**TABLE 1**  
**SUMMARY OF ASBESTOS ANALYTIC DATA**

**“ADA Modifications”**  
**Clark Complex**  
**3015 “H” Street**  
**Eureka, CA**

Sample Number	Sample Description (each layer)	Location	Asbestos % and Type	Friable vs. Non-Friable	Comments
22204-21	Plaster patch, Lt. gray	Hall Restrooms, above ceiling, on original plaster ceiling	NAD	NF	
22204-22	Sheet flooring, tan marble	M.RR, floor, bottom layer	NAD	NF	
2 <sup>nd</sup> layer	Felt, black	“	NAD	NF	
3 <sup>rd</sup> layer	Mastic, brown	“	NAD	NF	
22204-23	Sheet flooring, tan marble	M.RR, floor, bottom layer	NAD	NF	
2 <sup>nd</sup> layer	Felt, gray	“	NAD	NF	
22204-24	Sheet flooring, green-tan marble	W.RR, floor, 2 <sup>nd</sup> layer	NAD	NF	
2 <sup>nd</sup> layer	Black Mastic	“	NAD	NF	
22204-25	Sheet flooring, green-tan marble	W.RR, floor, 2 <sup>nd</sup> layer	NAD	NF	
2 <sup>nd</sup> layer	Black Mastic	“	NAD	NF	
22204-26	Sheet flooring, tan	W.RR, floor, 2 <sup>nd</sup> layer	NAD	NF	
22204-27	Black Mastic & black tarpaper	W.RR, floor, under 2 <sup>nd</sup> layer	NAD	NF	
22204-28	Black Mastic & black tarpaper	W.RR, floor, under 2 <sup>nd</sup> layer	NAD	NF	
22204-29	Tarpaper, black	W.RR, floor, under 2 <sup>nd</sup> layer	NAD	NF	

**TABLE 1  
SUMMARY OF ASBESTOS ANALYTIC DATA**

**“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA**

<b>Sample Number</b>	<b>Sample Description (each layer)</b>	<b>Location</b>	<b>Asbestos % and Type</b>	<b>Friable vs. Non-Friable</b>	<b>Comments</b>
22204-30	Sheet flooring, tan marble	W.RR, floor, bottom layer	NAD	NF	
2 <sup>nd</sup> layer	Felt, gray	“	NAD	NF	
3 <sup>rd</sup> layer	Black mastic	“	NAD	NF	
22204-31	Sheet flooring, tan marble	W.RR, floor, bottom layer	NAD	NF	
2 <sup>nd</sup> layer	Felt, gray	“	NAD	NF	
3 <sup>rd</sup> layer	Mastic, tan	“	NAD	NF	
22204-32	Sheet flooring, brown	W.RR, floor, bottom layer	NAD	NF	
22204-33	Asphalt, black	Exterior, parking lot	NAD	NF	
22204-34	Asphalt, black	Exterior, parking lot	NAD	NF	
22204-35	Asphalt, black	Exterior, parking lot	NAD	NF	
22204-36	Stucco; topcoat, tan	Exterior, siding	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, gray	“	NAD	NF	
22204-37	Stucco; topcoat, tan	Exterior, siding	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, gray	“	NAD	NF	
22204-38	Stucco; topcoat, tan	Exterior, siding	NAD	NF	
2 <sup>nd</sup> layer	Rough coat, gray	“	NAD	NF	

**TABLE 1**  
**SUMMARY OF ASBESTOS ANALYTIC DATA**

**“ADA Modifications”**  
**Clark Complex**  
**3015 “H” Street**  
**Eureka, CA**

<b>Sample Number</b>	<b>Sample Description (each layer)</b>	<b>Location</b>	<b>Asbestos % and Type</b>	<b>Friable vs. Non-Friable</b>	<b>Comments</b>
22204-39	Cinder block, gray	Exterior, entry landing, wall	NAD	NF	
22204-40	Cinder block, gray	Exterior, entry landing, wall	NAD	NF	
22204-41	Mortar, gray	Exterior, entry landing, wall	NAD	NF	
22204-42	Mortar, gray	Exterior, entry landing, wall	NAD	NF	
22204-43	Concrete, gray	Exterior, entry landing, slab	NAD	NF	

**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 1<sup>st</sup> 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**

“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA

**XRF Lead Paint Analyzer:**

Heuresis Corp.  
Model: Pb200i  
Serial# 1566

**Calibration:**

Standard Reference Material: lead content of  $1.04 \text{ mg/cm}^2 \pm 0.0643$

Response Verification Check Range:  $0.8 \text{ mg/cm}^2$  to  $1.2 \text{ mg/cm}^2$

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 <sup>2</sup> )	Paint Classification	Surface Coating Material	Color	Substrate
1	Calibration	Standard Reference Material	1.0	--	--	--	--
2	Calibration	Standard Reference Material	1.1	--	--	--	--
3	Calibration	Standard Reference Material	1.1	--	--	--	--
4	RR4	Wall	0.2	LCSC	Paint	White	Plaster
5	RR4	Door trim	0	NEG	Paint	White	Wood

NEG = Negative (<0.1 mg/cm<sup>2</sup>)

LCSC = Lead Containing Surface Coating ( $\geq 0.1 \text{ mg/cm}^2$  &  $< 1.0 \text{ mg/cm}^2$ )

LBP=Lead Based Paint ( $\geq 1.0 \text{ mg/cm}^2$ )

**TABLE 3  
XRF PAINT SAMPLING DATA**

“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm <sup>2</sup> )	Paint Classification	Surface Coating Material	Color	Substrate
6	RR4	Door	0.1	LCSC	Paint	White	Wood
7	RR4	Sink	-0.3	NEG	Glaze	White	Ceramic
8	RR4	Toilet	0.3	LCSC	Glaze	White	Ceramic
9	RR4	Window trim	-0.1	NEG	Paint	White	Wood
10	RR4, outside restroom	Wall	0.2	LCSC	Paint	White	Plaster
11	Calibration	Standard Reference Material	1.0	--	--	--	--
12	Calibration	Standard Reference Material	1.0	--	--	--	--
13	Calibration	Standard Reference Material	1.0	--	--	--	--
14	Hall	Wall	0.3	LCSC	Paint	White	Plaster
15	W.RR	Door jamb	0.1	LCSC	Paint	Brown	Metal
16	W.RR	Door	-0.2	NEG	Paint	Brown	Wood
17	W.RR	Wall	0.1	LCSC	Paint	Yellow	Drywall

NEG = Negative (<0.1 mg/cm<sup>2</sup>)

LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm<sup>2</sup> & <1.0 mg/cm<sup>2</sup>)

LBP=Lead Based Paint (≥1.0 mg/cm<sup>2</sup>)

**TABLE 3  
XRF PAINT SAMPLING DATA**

“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm <sup>2</sup> )	Paint Classification	Surface Coating Material	Color	Substrate
18	W.RR	Toilet stall	0.1	LCSC	Paint	Blue	Metal
19	W.RR	Toilet	-0.3	NEG	Glaze	White	Ceramic
<b>20</b>	<b>W.RR</b>	<b>Sink</b>	<b>11.1</b>	<b>LBP</b>	<b>Paint</b>	<b>Tan</b>	<b>Cast iron</b>
21	M.RR	Urinal	-0.1	NEG	Glaze	White	Ceramic
22	M.RR	Toilet	-0.3	NEG	Glaze	White	Ceramic
23	M.RR	Sink	-0.2	NEG	Glaze	White	Ceramic
24	M.RR	Wall	0	NEG	Paint	Yellow	Drywall
25	M.RR	Door jamb trim	0.1	LCSC	Paint	Brown	Metal
26	Hall	Wall	0.4	LCSC	Paint	Tan	Plaster
27	M.RR	Door	-0.1	NEG	Paint	Brown	Wood
28	M.RR	Toilet stall door	0.1	LCSC	Paint	Blue	Metal
29	Exterior, front entry	Railing	0.2	LCSC	Paint	Black	Metal
30	Exterior, front entry	Wall	-0.1	NEG	Paint	Tan	Wood

NEG = Negative (<0.1 mg/cm<sup>2</sup>)

LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm<sup>2</sup> & <1.0 mg/cm<sup>2</sup>)

LBP=Lead Based Paint (≥1.0 mg/cm<sup>2</sup>)

**TABLE 3  
XRF PAINT SAMPLING DATA**

“ADA Modifications”  
Clark Complex  
3015 “H” Street  
Eureka, CA

Reading #	Sample Location	Component Description	Lead Concentration (mg/cm <sup>2</sup> )	Paint Classification	Surface Coating Material	Color	Substrate
31	Exterior, front entry	Post	-0.2	NEG	Paint	Tan	Wood
32	Exterior, front entry	Window trim	-0.2	NEG	Paint	Tan	Wood
33	Exterior, front entry	Windowsill	0.1	LCSC	Paint	Tan	Wood
34	Exterior, front entry	Post	0.2	LCSC	Paint	Tan	Metal
35	Exterior, front entry	Siding	0	NEG	Paint	Tan	Stucco
36	Exterior, front entry	Cinder block	0.4	LCSC	Paint	Tan	Concrete
37	Exterior, front entry	Siding	-0.2	NEG	Paint	Tan	Stucco
38	Exterior, front entry	Cinder block	-0.4	NEG	Paint	Tan	Concrete
39	Exterior, front entry	Cinder block	-0.3	NEG	Paint	Tan	Concrete
40	Calibration	Standard Reference Material	1.0	--	--	--	--
41	Calibration	Standard Reference Material	1.0	--	--	--	--
42	Calibration	Standard Reference Material	0.9	--	--	--	--

NEG = Negative (<0.1 mg/cm<sup>2</sup>)

LCSC = Lead Containing Surface Coating (≥ 0.1 mg/cm<sup>2</sup> & <1.0 mg/cm<sup>2</sup>)

LBP=Lead Based Paint (≥1.0 mg/cm<sup>2</sup>)



**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** 10/05/22      **AmeriSci Job #** 122101156  
**Date Examined** 10/19/22      **P.O. #**  
**Page** 1 of 12  
**RE:** 2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-1	122101156-01.1 <b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Ceiling	No	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Top Coat (Plaster) <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-1	122101156-01.2 <b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Ceiling	No	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Lt. Gray, Heterogeneous, Non-Fibrous, Cementitious, Rough Coat (Plaster) <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose Trace, Non-fibrous 95%, Perlite 5.0%			
22204-2	122101156-02.1 <b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Wall	No	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Top Coat (Plaster) <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-2	122101156-02.2 <b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Wall	No	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Lt. Gray, Heterogeneous, Non-Fibrous, Cementitious, Rough Coat (Plaster) <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 95%, Perlite 5.0%			
22204-3	122101156-03.1 <b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Wall	No	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Top Coat (Plaster) <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			

Client Name: Brunelle &amp; Clark Consulting, LLC

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-3	122101156-03.2	<b>No</b>	NAD
<b>Location:</b> Plaster; White TC/Lt Gray RC; RR4/Wall			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Lt. Gray, Heterogeneous, Non-Fibrous, Cementitious, Rough Coat (Plaster)			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 95%, Perlite 5.0%			
22204-4	122101156-04	<b>No</b>	NAD
<b>Location:</b> Button Board, Gypsum; RR4/Wall			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/Off-White, Heterogeneous, Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 7.0%, Non-fibrous 93%			
22204-5	122101156-05.1	<b>No</b>	NAD
<b>Location:</b> JC/GB; W RR/Ceiling			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Joint Compound			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-5	122101156-05.2	<b>No</b>	NAD
<b>Location:</b> JC/GB; W RR/Ceiling			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/Gray, Heterogeneous, Fibrous, Gypsum Board			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 6.0%, Fibrous glass Trace, Non-fibrous 94%			
22204-6	122101156-06.1	<b>No</b>	NAD
<b>Location:</b> JC/GB; W RR/Wall			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Joint Compound			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-6	122101156-06.2	<b>No</b>	NAD
<b>Location:</b> JC/GB; W RR/Wall			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/White, Heterogeneous, Fibrous, Gypsum Board			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 6.0%, Fibrous glass Trace, Non-fibrous 94%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

<b>Client No. / HGA</b>	<b>Lab No.</b>	<b>Asbestos Present</b>	<b>Total % Asbestos</b>
22204-7 <b>Location:</b> JC/GB; M RR/Ceiling	122101156-07.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Homogeneous, Non-Fibrous, Cementitious, Joint Compound <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-7 <b>Location:</b> JC/GB; M RR/Ceiling	122101156-07.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/Off-White, Heterogeneous, Fibrous, Gypsum Board <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 6.0%, Fibrous glass Trace, Non-fibrous 94%			
22204-8 <b>Location:</b> JC/GB; M RR/Wall	122101156-08.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Homogeneous, Non-Fibrous, Cementitious, Joint Compound <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-8 <b>Location:</b> JC/GB; M RR/Wall	122101156-08.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/White, Heterogeneous, Fibrous, Gypsum Board <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 6.0%, Fibrous glass Trace, Non-fibrous 94%			
22204-9 <b>Location:</b> JC/GB; M RR/Wall	122101156-09.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Homogeneous, Non-Fibrous, Cementitious, Joint Compound <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-9 <b>Location:</b> JC/GB; M RR/Wall	122101156-09.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/White, Heterogeneous, Fibrous, Gypsum Board <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 7.0%, Fibrous glass Trace, Non-fibrous 93%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

<b>Client No. / HGA</b>	<b>Lab No.</b>	<b>Asbestos Present</b>	<b>Total % Asbestos</b>
22204-10	122101156-10	<b>No</b>	<b>NAD</b>
<b>Location:</b> Panel Glue, Yellow; W RR/Wall Panel			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose Trace, Non-fibrous 100%			
22204-11	122101156-11	<b>No</b>	<b>NAD</b>
<b>Location:</b> Panel Glue, Yellow; M RR/Wall Panel			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose Trace, Non-fibrous 100%			
22204-12	122101156-12	<b>No</b>	<b>NAD</b>
<b>Location:</b> BBM, Dark Brown; W RR/Vinyl Baseboard			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Wollastonite Trace, Non-fibrous 100%			
22204-13	122101156-13	<b>No</b>	<b>NAD</b>
<b>Location:</b> BBM, Dark Brown; M RR/Vinyl Baseboard			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Wollastonite Trace, Non-fibrous 100%			
22204-14	122101156-14	<b>No</b>	<b>NAD</b>
<b>Location:</b> BBM, Dark Brown; M RR/Vinyl Baseboard			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Dark Brown, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Wollastonite Trace, Non-fibrous 100%			
22204-15 6	122101156-15L1	<b>Yes</b>	<b>15%</b>
<b>Location:</b> SF, Red Mosaic/Tan Glue; W RR/Floor/Top Layer			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Red, Heterogeneous, Fibrous, Sheet Flooring			
<b>Asbestos Types:</b> Chrysotile 15%			
<b>Other Material:</b> Cellulose 5.0%, Non-fibrous 80%			



**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-15 6	122101156-15L2 <b>Location:</b> SF, Red Mosaic/Tan Glue; W RR/Floor/Top Layer	<b>Yes</b>	2.0% (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Glue <b>Asbestos Types:</b> Chrysotile 2.0% <b>Other Material:</b> Cellulose 5.0%, Non-fibrous 93%			
22204-16 6	122101156-16 <b>Location:</b> SF, Red Mosaic/Tan Glue; M RR/Floor/Top Layer		NA/PS
<b>Analyst Description:</b> Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b>			
22204-17	122101156-17 <b>Location:</b> Tar Paper, Black; M RR/Floor/Under Particle Board	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
22204-18	122101156-18 <b>Location:</b> Tar Paper, Black; M RR/Floor/Under Particle Board	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
22204-19	122101156-19 <b>Location:</b> Plaster Patch, Lt Gray; Hall RR's/Above Ceiling/On Original Plaster Ceiling	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 93%, Perlite 7.0%			
22204-20	122101156-20 <b>Location:</b> Plaster Patch, Lt Gray; Hall RR's/Above Ceiling/On Original Plaster Ceiling	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 93%, Perlite 7.0%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-21	122101156-21	<b>No</b>	NAD
	<b>Location:</b> Plaster Patch, Lt Gray; Hall RR's/Above Ceiling/On Original Plaster Ceiling		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> White, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Non-fibrous 93%, Perlite 7.0%		
22204-22	122101156-22.1	<b>No</b>	NAD
9	<b>Location:</b> SF, Tan Marble With Gray Felt Back; M RR/Floor/Bottom Layer		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Sheet Flooring		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Cellulose 35%, Non-fibrous 65%		
22204-22	122101156-22.2	<b>No</b>	NAD
9	<b>Location:</b> SF, Tan Marble With Gray Felt Back; M RR/Floor/Bottom Layer		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Felt		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%		
22204-22	122101156-22.3	<b>No</b>	NAD
9	<b>Location:</b> SF, Tan Marble With Gray Felt Back; M RR/Floor/Bottom Layer		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> Brown, Heterogeneous, Non-Fibrous, Mastic		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Cellulose 3.0%, Non-fibrous 97%		
22204-23	122101156-23.1	<b>No</b>	NAD
9	<b>Location:</b> SF, Tan Marble With Gray Felt Back; M RR/Floor/Bottom Layer		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Flooring		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Cellulose 15%, Non-fibrous 85%		
22204-23	122101156-23.2	<b>No</b>	NAD
9	<b>Location:</b> SF, Tan Marble With Gray Felt Back; M RR/Floor/Bottom Layer		(by CVES) by David W. Ralbovsky on 10/19/22
	<b>Analyst Description:</b> Gray, Heterogeneous, Fibrous, Felt		
	<b>Asbestos Types:</b>		
	<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%		

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-24 10	122101156-24.1 <b>Location:</b> SF, Green-Tar Marble/Black Mastic; W RR/Floor/2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Green-Tan, Heterogeneous, Non-Fibrous, Flooring <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 35%, Non-fibrous 65%			
22204-24 10	122101156-24.2 <b>Location:</b> SF, Green-Tar Marble/Black Mastic; W RR/Floor/2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 15%, Non-fibrous 85%			
22204-25 10	122101156-25.1 <b>Location:</b> SF, Green-Tar Marble/Black Mastic; W RR/Floor/2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Green-Tan, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 35%, Non-fibrous 65%			
22204-25 10	122101156-25.2 <b>Location:</b> SF, Green-Tar Marble/Black Mastic; W RR/Floor/2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 7.0%, Non-fibrous 93%			
22204-26	122101156-26 <b>Location:</b> SF, Tan; W RR/Floor/2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 35%, Non-fibrous 65%			

Client Name: Brunelle &amp; Clark Consulting, LLC

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-27 12	122101156-27 <b>Location:</b> Black Mastic/Tar Paper, Black; W RR/Floor/Under 2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Composite			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
<b>Comment:</b> Inseparable Mastic/Felt. Analyzed as a Composite.			
22204-28 12	122101156-28 <b>Location:</b> Black Mastic/Tar Paper, Black; W RR/Floor/Under 2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Composite			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
<b>Comment:</b> Inseparable Mastic/Felt. Analyzed as a Composite.			
22204-29	122101156-29 <b>Location:</b> Tar Paper, Black; W RR/Floor/Under 2nd Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
22204-30 9	122101156-30.1 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/Floor/Bottom Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Fibrous, Felt			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
22204-30 9	122101156-30.2 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/Floor/Bottom Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Green, Heterogeneous, Non-Fibrous, Flooring			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose 15%, Non-fibrous 85%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-30 9	122101156-30.3 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/Floor/Bottom Layer	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 7.0%, Non-fibrous 93%			
22204-31 9	122101156-31.1 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Sheet Flooring <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 35%, Non-fibrous 65%			
22204-31 9	122101156-31.2 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Fibrous, Felt <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 95%, Non-fibrous 5.0%			
22204-31 9	122101156-31.3 <b>Location:</b> SF, Tan Marble With Gray Felt Back; W RR/	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Mastic <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 5.0%, Non-fibrous 95%			
22204-32 9	122101156-32 <b>Location:</b> SF, Brown; W RR/	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Brown/Black, Heterogeneous, Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose 65%, Non-fibrous 35%			
22204-33 9	122101156-33 <b>Location:</b> Asphalt, Black; Exterior/Parking Lot	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Cellulose Trace, Non-fibrous 100%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

<b>Client No. / HGA</b>	<b>Lab No.</b>	<b>Asbestos Present</b>	<b>Total % Asbestos</b>
22204-34 <b>Location:</b> Asphalt, Black; Exterior/Parking Lot	122101156-34	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-35 <b>Location:</b> Asphalt, Black; Exterior/Parking Lot	122101156-35	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Black, Heterogeneous, Non-Fibrous, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Cellulose Trace, Non-fibrous 100%			
22204-36 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-36.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Stucco			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-36 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-36.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Cementitious Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-37 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-37.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Cementitious, Stucco			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			
22204-37 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-37.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Cementitious Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			

**PLM Bulk Asbestos Report**2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

<b>Client No. / HGA</b>	<b>Lab No.</b>	<b>Asbestos Present</b>	<b>Total % Asbestos</b>
22204-38 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-38.1	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Tan, Heterogeneous, Non-Fibrous, Cementitious, Stucco <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-38 <b>Location:</b> Stucco; Tan TC/Gray RC; Exterior/Siding	122101156-38.2	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Cementitious Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-39 <b>Location:</b> Cinder Block, Gray; Exterior/Entry Landing/Wall	122101156-39	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-40 <b>Location:</b> Cinder Block, Gray; Exterior/Entry Landing/Wall	122101156-40	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-41 <b>Location:</b> Mortar, Gray; Exterior/Entry Landing/Wall	122101156-41	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			
22204-42 <b>Location:</b> Mortar, Gray; Exterior/Entry Landing/Wall	122101156-42	<b>No</b>	NAD (by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material <b>Asbestos Types:</b> <b>Other Material:</b> Non-fibrous 100%			

Client Name: Brunelle & Clark Consulting, LLC

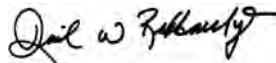
# PLM Bulk Asbestos Report

2200204; "ADA Modifications"; Clark Complex 3015 "H" St  
Eureka, CA

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
22204-43	122101156-43	No	NAD
<b>Location:</b> Concrete, Gray; Exterior/Entry Landing/Slab			(by CVES) by David W. Ralbovsky on 10/19/22
<b>Analyst Description:</b> Gray, Heterogeneous, Non-Fibrous, Cementitious, Bulk Material			
<b>Asbestos Types:</b>			
<b>Other Material:</b> Non-fibrous 100%			

**Reporting Notes:**

Analyzed by: David W. Ralbovsky  
Date: 10/19/22



Reviewed by: Glenn F. Massey



\*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 #229707, 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.



122101156

Analysis: <input checked="" type="checkbox"/> Standard PLM <input type="checkbox"/> 400 Point Count <input type="checkbox"/> 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: 10/1/22 "ADA Modifications" Site: Clark Complex 3015 "H" St. Eureka, CA Proj. # 2200204
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**BULK ASBESTOS SAMPLING**

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
22204-1	Plaster; <sup>white</sup> TC / <sup>Lt. gray</sup> RC	1	RR4 / Ceiling	SM	NF
- 2	↓ / ↓	1	↓ / wall	↓	↓
- 3	↓ / ↓	1	↓ / ↓	↓	↓
- 4	Button Board, gypsum	2	↓ / ↓	MM	↓
- 5	JC / GB	3	W.RR / Ceiling	↓	↓
- 6	↓	3	↓ / wall	↓	↓
- 7	↓	3	M.RR / Ceiling	↓	↓
- 8	↓	3	↓ / wall	↓	↓
- 9	↓	3	↓ / ↓	↓	↓
- 10	Panel glue, yellow	4	W.RR / wall panel	↓	↓
- 11	↓	4	M.RR / wall panel	↓	↓
- 12	BBM, dark brown	5	W.RR / vinyl baseboard	↓	↓
- 13	↓	5	M.RR / vinyl base-board	↓	↓
- 14	↓	5	↓ / ↓	↓	↓
* - 15	SF, red mosaic / tan glue	6	W.RR / Floor / top layer	↓	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: Kevin Brunelle Relinquished by: KMB 10/3/22 Date/Time:	Received by: <i>[Signature]</i> Signature: <i>[Signature]</i> Date/Time:
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OCT 05 2022

Received

Analysis: <input checked="" type="checkbox"/> Standard PLM <input type="checkbox"/> 400 Point Count <input type="checkbox"/> 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: 10/1/22 "ADA Modifications" Site: Clark Complex 3015 "H" St. Eureka, CA Proj. # 2200204
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**BULK ASBESTOS SAMPLING**

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
* 22204-16	SF, red mosaic / Tan glue	6	M.RR / Floor / top layer	MM	F
- 17	Tar Paper, black	7	/ / / under particle board	↓	NF
- 18	↓	7	↓ / ↓ / ↓	↓	↓
- 19	Plaster Patch, lt. gray	8	Hall RR's / above / on original Ceiling / Plaster Ceiling	SM	↓
- 20	↓	8	↓ / ↓ / ↓	↓	↓
- 21	↓	8	↓ / ↓ / ↓	↓	↓
* - 22	SF, tan marble with gray felt back	9	M.RR / Floor / bottom layer	MM	F
- 23	↓	9	↓ / ↓ / ↓	↓	↓
* - 24	SF, green-tan marble / black mastic	10	W.RR / Floor / 2nd layer	↓	↓
- 25	↓	10	↓ / ↓ / ↓	↓	↓
- 26	SF, tan	11	/ / / 2nd Layer	↓	↓
* - 27	Black mastic / Tar paper, black	12	/ / / under 2nd layer	↓	NF
- 28	↓	12	/ / / ↓	↓	↓
- 29	Tar paper, black	7	/ / / ↓	↓	↓
* - 30	SF, tan marble with gray felt back	9	↓ / ↓ / bottom layer	↓	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: Kevin Brunelle	Received by:	Received
Relinquished by: Km Bz 10/3/22	Signature:	
Date/Time:	Date/Time:	

OCT 05 2022  
 [Signature]

Analysis: <input checked="" type="checkbox"/> Standard PLM <input type="checkbox"/> 400 Point Count <input type="checkbox"/> 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: 10/1/22 "ADA Modifications" Site: Clark Complex 3015 "H" St. Eureka, CA Proj. # 2200204
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**BULK ASBESTOS SAMPLING**

Sample No.	Sample Description	Hom. Area	Location	Mat'l Type	Friability
* 22204-31	SF, tan marble with gray felt back	9	W.RR/Floor/bottom layer	MM	F
- 32	SF, brown	13	↓ / ↓ / bottom layer	↓	↓
- 33	Asphalt, black	14	Exterior/parking lot	↓	NF
- 34	↓	14	↓	↓	↓
- 35	↓	14	↓	↓	↓
- 36	Stucco; tan TC / gray RC	15	/ Siding	MM	↓
- 37	↓	15	↓	↓	↓
- 38	↓	15	↓	↓	↓
- 39	Cinder Block, gray	16	/ Entry landing / wall	MM	↓
- 40	↓	16	↓	↓	↓
- 41	Mortar, gray	17	↓	↓	↓
- 42	↓	17	↓	↓	↓
✓ - 43	concrete, gray	18	↓ / ↓ / Slab	↓	↓

**Sample Abbreviations**

Hom. Area = Homogenous Area  
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BBM = Baseboard Mastic  
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**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

Sampled by: Kevin Brunelle Relinquished by: Km Bz 10/3/22 Date/Time:	Received by: Signature: Date/Time:
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OCT 05 2022

*[Signature]*

**XRF Paint Analyzer Data Sheet**  
**ADA Modifications**  
**Clark Complex**  
**3015 H St., Eureka, CA**

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

Reading #	Concentration	Units	3 SD	Result	Action Level	NomSecs	Date	Time	User	Mode	Analytic Mode
1	1	mg/cm2	0.2	Positive	1	5	10/1/2022	11:59:40	zburnelle	Action Lev	Lead Paint
2	1.1	mg/cm2	0.2	Positive	1	5	10/1/2022	12:00:41	zburnelle	Action Lev	Lead Paint
3	1.1	mg/cm2	0.2	Positive	1	5	10/1/2022	12:01:16	zburnelle	Action Lev	Lead Paint
4	0.2	mg/cm2	0.3	Negative	1	2	10/1/2022	12:02:19	zburnelle	Action Lev	Lead Paint
5	0	mg/cm2	0.3	Negative	1	2	10/1/2022	12:02:56	zburnelle	Action Lev	Lead Paint
6	0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:03:20	zburnelle	Action Lev	Lead Paint
7	-0.3	mg/cm2	0.3	Negative	1	2	10/1/2022	12:03:46	zburnelle	Action Lev	Lead Paint
8	0.3	mg/cm2	0.3	Negative	1	2	10/1/2022	12:04:58	zburnelle	Action Lev	Lead Paint
9	-0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:05:18	zburnelle	Action Lev	Lead Paint
10	0.2	mg/cm2	0.3	Negative	1	2	10/1/2022	12:06:19	zburnelle	Action Lev	Lead Paint
11	1	mg/cm2	0.2	Positive	1	5	10/1/2022	12:34:44	zburnelle	Action Lev	Lead Paint
12	1	mg/cm2	0.2	Positive	1	5	10/1/2022	12:35:15	zburnelle	Action Lev	Lead Paint
13	1	mg/cm2	0.2	Positive	1	5	10/1/2022	12:35:58	zburnelle	Action Lev	Lead Paint
14	0.3	mg/cm2	0.3	Negative	1	2	10/1/2022	12:36:53	zburnelle	Action Lev	Lead Paint
15	0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:37:11	zburnelle	Action Lev	Lead Paint
16	-0.2	mg/cm2	0.3	Negative	1	2	10/1/2022	12:37:39	zburnelle	Action Lev	Lead Paint
17	0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:39:22	zburnelle	Action Lev	Lead Paint
18	0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:40:18	zburnelle	Action Lev	Lead Paint
19	-0.3	mg/cm2	0.3	Negative	1	2	10/1/2022	12:40:53	zburnelle	Action Lev	Lead Paint
20	11.1	mg/cm2	0.3	Positive	1	2	10/1/2022	12:44:50	zburnelle	Action Lev	Lead Paint
21	-0.1	mg/cm2	0.3	Negative	1	2	10/1/2022	12:46:06	zburnelle	Action Lev	Lead Paint
22	-0.3	mg/cm2	0.3	Negative	1	2	10/1/2022	12:46:33	zburnelle	Action Lev	Lead Paint
23	-0.2	mg/cm2	0.3	Negative	1	2	10/1/2022	12:46:56	zburnelle	Action Lev	Lead Paint

**XRF Paint Analyzer Data Sheet**  
**ADA Modifications**  
**Clark Complex**  
**3015 H St., Eureka, CA**

24	0 mg/cm2	0.3 Negative	1	2	10/1/2022	12:47:48	zburnelle	Action Lev Lead Paint
25	0.1 mg/cm2	0.3 Negative	1	2	10/1/2022	12:48:05	zburnelle	Action Lev Lead Paint
26	0.4 mg/cm2	0.3 Negative	1	2	10/1/2022	12:48:30	zburnelle	Action Lev Lead Paint
27	-0.1 mg/cm2	0.3 Negative	1	2	10/1/2022	12:49:26	zburnelle	Action Lev Lead Paint
28	0.1 mg/cm2	0.3 Negative	1	2	10/1/2022	12:50:56	zburnelle	Action Lev Lead Paint
29	0.2 mg/cm2	0.3 Negative	1	2	10/1/2022	12:55:21	zburnelle	Action Lev Lead Paint
30	-0.1 mg/cm2	0.3 Negative	1	2	10/1/2022	12:55:47	zburnelle	Action Lev Lead Paint
31	-0.2 mg/cm2	0.3 Negative	1	2	10/1/2022	12:57:11	zburnelle	Action Lev Lead Paint
32	-0.2 mg/cm2	0.3 Negative	1	2	10/1/2022	12:58:27	zburnelle	Action Lev Lead Paint
33	0.1 mg/cm2	0.4 Negative	1	1	10/1/2022	12:59:09	zburnelle	Action Lev Lead Paint
34	0.2 mg/cm2	0.3 Negative	1	2	10/1/2022	12:59:53	zburnelle	Action Lev Lead Paint
35	0 mg/cm2	0.3 Negative	1	2	10/1/2022	13:00:21	zburnelle	Action Lev Lead Paint
36	0.4 mg/cm2	0.3 Negative	1	2	10/1/2022	13:00:37	zburnelle	Action Lev Lead Paint
37	-0.2 mg/cm2	0.3 Negative	1	2	10/1/2022	13:01:12	zburnelle	Action Lev Lead Paint
38	-0.4 mg/cm2	0.3 Negative	1	2	10/1/2022	13:01:32	zburnelle	Action Lev Lead Paint
39	-0.3 mg/cm2	0.3 Negative	1	2	10/1/2022	13:02:05	zburnelle	Action Lev Lead Paint
40	1 mg/cm2	0.2 Positive	1	5	10/1/2022	13:04:50	zburnelle	Action Lev Lead Paint
41	1 mg/cm2	0.2 Positive	1	5	10/1/2022	13:05:22	zburnelle	Action Lev Lead Paint
42	0.9 mg/cm2	0.2 Negative	1	5	10/1/2022	13:05:52	zburnelle	Action Lev Lead Paint

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**APPENDIX C**  
**NESHAP Notification Form**



## **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.

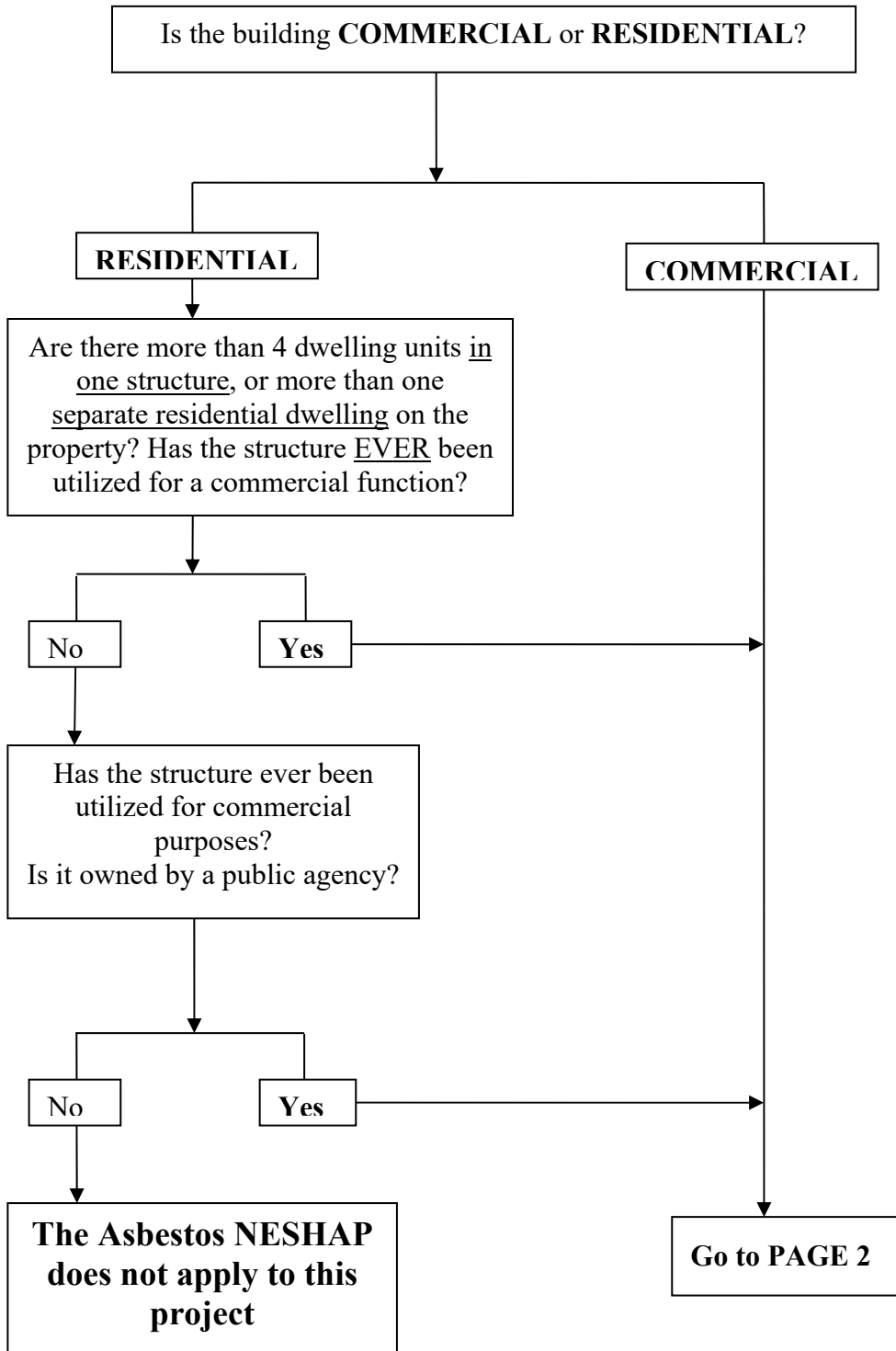
**For a demolition** - Upon completion of the asbestos survey, a demolition notification form must be submitted to the District at least 10 working days prior to the start date of the demolition. Notification of a demolition is required regardless of the amount of asbestos present. When asbestos-containing 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.*

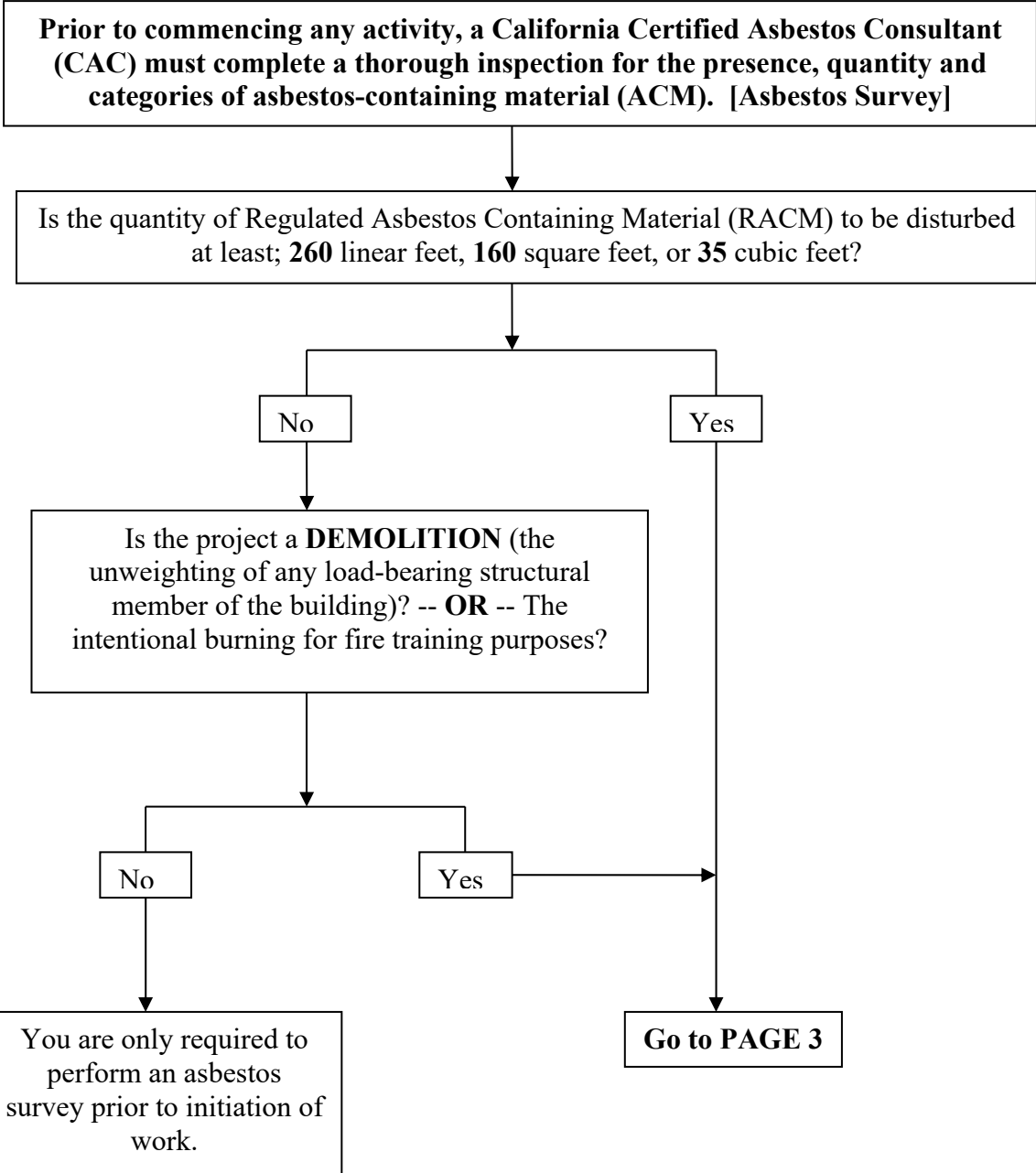
**f Violations of NESHAP regulations can be prosecuted as felony offenses carrying penalties of \$37,500 per day per offense.f**

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

# GUIDE TO ASBESTOS NESHAP QUESTIONS







## 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 **Demolition** 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 after 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.

**IN NO EVENT SHALL A PROJECT START ON A DATE OTHER THAN THE DATE CONTAINED IN THE WRITTEN NOTIFICATION.**

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

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



## 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 - <b>OR</b> - Renovation Notifications .....	<b>2 X</b>	(Regulation IV, Rule 401(B))
Asbestos Abatement ( <b>with</b> Demolition Projects) .....	<b>4 X</b>	(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 #
<b>I. TYPE OF NOTIFICATION</b> Circle One: <b>O</b> = Original <b>R</b> = Revised <b>C</b> = Canceled			
<b>II. FACILITY INFORMATION</b> ( <i>Identify owner, removal contractor and any other contractors</i> )			
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:	
<b>III. TYPE OF OPERATION</b> Circle One: <b>D</b> = Demolition <b>O</b> = Ordered Demolition <b>R</b> = Renovation <b>E</b> = Emergency Renov.			
<b>IV. IS ASBESTOS PRESENT</b> Circle One:        (Yes    No)			
<b>V. FACILITY DESCRIPTION</b> ( <i>Include building name, number and floor or room numbers</i> )			
Bldg. Name:			
Address:			
City:	State:	Zip:	County:
Site Location:			
Building Size:	# of Floors:	Age in Years:	
Present Use:		Prior Use:	
<b>VI. PROCEDURE USED TO DETECT THE PRESENCE OF ASBESTOS MATERIAL</b> {An asbestos survey performed by a California "Certified Asbestos Consultant", is required to process this notification}			
C.A.C. Certification #		Certification Expiration Date:	
<b>VII. APPROXIMATE AMOUNT OF ASBESTOS, INCLUDING:</b> 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
		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:
<b>VIII. SCHEDULED DATES ASBESTOS REMOVAL</b> (MM/DD/YY)		Start:	Complete
<b>IX. SCHEDULED DATES DEMO/RENOVATION</b> (MM/DD/YY)		Start:	Complete
<b>X. DESCRIPTION OF PLANNED DEMOLITION OR RENOVATION WORK, AND METHOD(S) TO BE USED:</b>			
<b>District Use Only</b>	Date Payment Received:	Payment Method:	Check Number:      Amount:

NOTIFICATION OF DEMOLITION OR RENOVATION (continued)

<b>XI. DESCRIPTION OF WORK PRACTICES AND ENGINEERING CONTROLS TO BE USED TO PREVENT EMISSIONS OF ASBESTOS AT THE DEMOLITION OR RENOVATION SITE (<i>attach work plan, if appropriate</i>):</b>		
<b>XII. WASTE TRANSPORTER #1</b>		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	
<b>WASTE TRANSPORTER #2</b>		
Name:		
Address:		
City:	State:	Zip:
Contact Person:	Tel:	
<b>XIII. WASTE DISPOSAL SITE</b>		
Name:		Tel:
Address:		
City:	State:	Zip:
<b>XIV. IF DEMOLITION ORDERED BY A GOVERNMENT AGENCY PLEASE IDENTIFY THE AGENCY BELOW (<i>attach copy of demolition order</i>):</b>		
Name:		Title
Authority		
Date of Order (MM/DD/YY):	Date Ordered to Begin (mm/dd/yy):	
<b>XV. FOR EMERGENCY RENOVATIONS</b>		
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:		
<b>XVI. DESCRIPTION OF PROCEDURES TO BE FOLLOWED IN THE EVENT THAT UNEXPECTED ASBESTOS IS FOUND, OR PREVIOUSLY NONFRIABLE ASBESTOS MATERIAL BECOMES FRIABLE:</b>		
<b>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.</b>		
_____		_____
(Print Name of Owner/Operator)		(Signature of Owner/Operator)
<b>XVIII. I CERTIFY THAT THE ABOVE INFORMATION IS CORRECT.</b>		
_____		_____
(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.

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**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 **10/15/23**

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.



STATE OF CALIFORNIA  
 DEPARTMENT OF PUBLIC HEALTH



**LEAD-RELATED CONSTRUCTION CERTIFICATE**

INDIVIDUAL:	CERTIFICATE TYPE:	NUMBER:	EXPIRATION DATE:
 Zindar Brunelle	Lead Inspector/Assessor	LRC-00000482	9/2/2023
	Lead Supervisor	LRC-00000481	9/2/2023

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](http://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 1011**  
 as required under Toxic Substances Control Act Title II

1/5/2022 Class Date(s)	170527 Certificate Number
David Esparza - President	1/5/2023 Expiration Date

CA-001-08  
 Cal/OSHA Number

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